



NATIONAL PAR MONITOR

SERBIA

2021/2022



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As in the case of the first two National PAR Monitor reports published for the period 2017/2018 and 2019/2020, special acknowledgements also go to civil servants, civil society representatives, members of the WeBER Platform and the National Working Group in Serbia, and other stakeholders in Serbia that shared their experiences through focus groups, surveys, and interviews, who immensely contributed to the content of this report and its quality, and who will not be identified due to the respect of the principle of anonymity.

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ABOUT WEBER 2.0

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:



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



Who do we cooperate with?

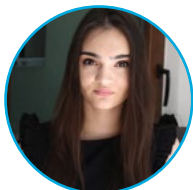
Building upon the foundations of the original project, WeBER 2.0 has fostered and sustained successful collaborations with key regional and national stakeholders, ensuring the long-term viability of PAR in the Western Balkans. In each of the countries in the region, our project partners have maintained 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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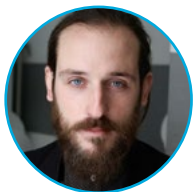
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EXECUTIVE SUMMARY

WHY IS PAR MONITORING BY THE CIVIL SOCIETY STILL RELEVANT?

Public administration reform (PAR), as an integral part of the first cluster, is one of the fundamental conditions on the way to the EU membership. In the Western Balkans region, this reform has been assessed for years through the lenses of the SIGMA Principles of Public Administration, developed by OECD/SIGMA and endorsed by the EU. These Principles define what makes a well-functioning administration in terms of its ability to deliver transparent, efficient and effective services to citizens and to support socio-economic development. In the context of high external pressure for tangible developments in PAR, homegrown demand for better administration becomes even more important to keep pressuring the government to pursue reforms once the external conditionality dissipates as a result of a completed EU accession process. Civil society actors, with local knowledge of the administration's functioning, can lead such domestic advocacy efforts aimed at better administration. Independent PAR monitoring and evidence-based dialogue with the government represent a good approach to achieving this goal.

WEBER MONITORING APPROACH – FOCUS ON THE NEEDS OF CIVIL SOCIETY AND THE PUBLIC

Based on such a rationale, the WeBER project has completed the third PAR monitoring cycle for 2021/2022. The structured, evidence-based approach, as in the previous two monitoring cycles, particularly focuses on PAR aspects with the highest relevance to civil society and to the public.

WeBER PAR monitoring strongly relies on the strengths, skills, and local knowledge of the civil society in the Western Balkans. It builds on SIGMA's Principles of Public Administration as a cornerstone of PAR, while assessing them from the standpoint of an independently produced PAR Monitor methodology. Overall, the methodology, slightly revised using the lessons learned in the first monitoring cycle, is based on the selection of 22 SIGMA principles within six key PAR areas, monitored and reported through 23 compound indicators. The third monitoring cycle also represents the last edition of the PAR Monitor in accordance with the existing framework of the SIGMA Principles from 2014, modified in 2017, since the process of revision of the Principles is ongoing. Therefore, the next, fourth monitoring cycle will be based on the modified PAR Monitor methodology, aligned with the new SIGMA framework, given that it represents the basis of the WeBER approach to PAR monitoring in the Western Balkans region.

The design of all WeBER indicators enables comparisons between the administrations in the Western Balkans and allows for regional comparability of results. In addition to the methodology, the PAR Monitor package comprises a comparative monitoring report for the entire WB region as well as six reports which elaborate on detailed findings for each administration. This report provides the results of the third monitoring cycle for Serbia, including a set of actionable recommendations.

OVERVIEW OF WEBER MONITORING RESULTS FOR SERBIA 2021/2022

Strategic framework for PAR: Improved participation in the development of key strategic documents

The practice of involving CSOs in developing strategic documents for PAR shows an improvement compared to previous cycles. Civil society in Serbia was consulted in the early stages of preparation of the four analysed PAR strategic documents, primarily through the membership in the Special Working Group for the preparation of the Public Administration Reform Strategy for 2021-2030, while invitations for the participation of CSOs were

open and transparent. Despite this, a low level of proactivity of responsible PAR institutions was recorded in this cycle in terms of inviting a wider range of stakeholders (such as trade unions or organisations dealing with gender equality and disability issues). Also, the practices in the consultation process were not uniform - CSOs did not receive complete information in order to prepare for the consultation process on two strategic documents, while there is evidence that responsible institutions considered the comments and suggestions received in the consultation process in the other two cases. Additionally, feedback on the treatment of comments received was publicly available only for one analysed document. When it comes to additional dialogue on contested or unresolved issues, the Ministry of Finance held additional policy dialogue on the Public Finance Management Reform Programme, but only in the final consultation stage, during public debate. In addition, the Ministry of Public Administration and Local Self-Government proactively included the Ministry of Finance in the dialogue with CSOs regarding additional issues that have arisen in the development of the Programme for the Reform of the Local Self-Government System. In the case of the PAR Strategy, there were no disputed issues and no evidence that such dialogues were organised for the Programme for the Improvement of Public Policy Management and Regulatory Reform. Finally, the involvement of the general public in these processes was ensured by organising public debates for all four strategic documents, with clearly indicated channels for submitting comments and suggestions.

Regarding the participation of civil society in the structures for PAR monitoring and coordination, no progress was recorded compared to the previous monitoring cycles. CSOs are not included in the work of the PAR Council. At the same time, a novelty is involvement of a representative of the Standing Conference of Towns and Municipalities, the association of towns and municipalities in Serbia, as a full member of the Council. On the other hand, CSOs are full-right members of the Interministerial Project Group, whose representatives were elected based on an open call. However, IMPG members from civil society still have objections to the work of this body, emphasising their inability to substantially influence decision-making process, that final treatment of their comments and suggestions is unclear, and that they were not consulted regarding on measures for financing the reform. Additionally, the meetings of this IMPG and the PAR Council are held irregularly.

Policy Development and Coordination: Lasting dissatisfaction of civil society, the Government has made insufficient progress

UIn the area of policy development and coordination, a certain, albeit limited, progress was recorded. This was achieved primarily thanks to the higher inclusiveness and openness of policy development and a somewhat greater public availability of information on the Government's performance. On other issues, Serbia mostly stagnated or recorded a minor decline.

Regarding the availability of information on the Government's performance, two consecutive annual reports on the Government's work were publicly available at the time of monitoring, which was not the case in previous cycles. Nevertheless, the reports still do not meet the criteria in terms of citizen-friendliness, availability of information from the reports in open data format or existence of gender-classified data. Also, the persisting problem of the Government's reports is that they do not inform on performance of the Government as a collective body but represent the sum of the reports of individual administrative bodies.

The perception of civil society about various aspects of government planning and reporting remained very negative in this cycle. Most CSOs do not recognise the direct connection between the Government's work plans and actual events in policy areas, nor do they believe that the activities of the Government or ministries are affected by the adopted strategies. Also, when it comes to the transparency of the Government's decision-making, the situation is completely unchanged compared to the previous two cycles - the Government still does not publish agenda and minutes of its sessions, while certain adopted acts are often unpublished too.

Similarly, the situation is almost unchanged in terms of using evidence-based findings of civil society when developing public policies. Namely, there is still a relatively stable practice of referring to CSO research in policy

documents, such as strategies or programmes, with few very positive examples. On the other hand, findings of civil society or other non-state actors are rarely used in ex-ante or ex-post analysis.

The most pronounced, although certainly limited, shift was recorded in terms of the openness and inclusiveness of policy development. A larger share of adopted policy documents and law proposals was the subject of consultations or public debates, and a greater number of reports on the conducted consultative processes met the minimum quality standards. The impact of the analysed consultations and public debates on policy development increased to a certain extent. Additionally, the functions of the new eConsultation portal satisfy all the basic and most of the advanced criteria. Nevertheless, the practice of conducting consultations and public debates remains highly uneven within the administration, and there is insufficient proactivity in involving stakeholders in the early stages of these processes. The perception of civil society of consultation practices remains extremely negative.

Public service and human resource management: *Non-transparency, lack of information, and endless acting status of senior civil servants* The findings indicate that official data on the civil service system, such as the total number of civil servants and the number of civil servants per administrative body, are still unavailable. The authorities responsible for preparing reports on various aspects of civil service do not regularly publish them on their websites. On the other hand, the National Academy for Public Administration, and the Human Resource Management Service of the Government, continue promoting data from their jurisdiction online, such as data on professional development of civil servants and vacancy announcements.

Also, no progress has been recorded when it comes to the most important aspects of temporary employment (fixed-term employment, service contracts, etc.). Procedures for such types of engagements are insufficiently transparent, while there are no clearly defined limits on the contract duration for all forms of temporary engagements. The results of a survey of civil servants indicate that they still believe that temporary employment in the civil service is a rule, not an exception.

Regarding public competitions for jobs in the state administration, a step forward was noted in terms of advertising the vacancy announcements, and there is a possibility for candidates to receive clarifications during the public competition procedures via the "Candidates' Corner", which is managed by the Human Resource Management Service. However, although the administrative burden on candidates has been reduced, the obligation to take a state exam for senior civil servants' positions still represents an obstacle for new candidates. Finally, there is no possibility of supplementing incomplete documentation during the process, and information about annulled competitions is unavailable to the general public.

Protection of senior civil servants from unwanted political influence remains very low. Clear criteria are prescribed for their dismissal, and there is an obligation to appoint only fully employed civil servants as acting senior civil servants. However, the problem of excessive appointments of acting senior civil servants persists, as well as the continuous violation of the legal provisions limiting the maximum duration of acting status. In addition, less than a third of civil servants believe that their colleagues in senior positions could refuse illegal orders from their superiors without endangering their careers.

The transparency of the salary system is still not at a satisfactory level, with a lower result compared to the previous monitoring cycle. In particular, the problem is reflected in the lack of publicly available information on the salaries of civil servants, apart from basic information found in the Law on Salaries of Civil Servants and General Employees and annual budget laws. Finally, the legal framework defines measures to improve integrity and fight against corruption in the civil service system, but the problem remains adequate implementation. In addition, there are still differences in the perception of CSO representatives and civil servants regarding the effectiveness and impartiality of measures for improving integrity and the fight against corruption, with CSOs expressing complete mistrust in the effects of prescribed measures. Notably, although a third of civil servants consider these measures effective and impartial, a large percentage would not feel protected as whistleblowers.

Accountability: Insufficient proactive informing of administrative bodies and enduring concern of CSOs regarding the protection of freedom of information

In the area of accountability, the perception of CSOs in Serbia regarding the implementation of free access to information right has not changed significantly compared to the previous monitoring cycle. As many as 45% of the respondents believe that the authorities do not meet the prerequisite for free access to information of public importance, that is, they do not consistently record all the information generated in their work. Nevertheless, most of the surveyed CSOs confirm that the requested information is provided free of charge, in the requested format, and within the legally prescribed deadline. In addition, although more than half confirm that they are not required to provide reasons for submitting requests, as many as 41% confirmed that this still happens. As in previous monitoring cycles, the findings additionally suggest that civil society actors in Serbia have little experience with requesting information containing confidential or personal data.

When it comes to the perception of the work of the Commissioner for Information of Public Importance and Personal Data Protection, slightly more than a quarter of respondents consider the Commissioner's soft measures effective in protecting the freedom of information right. Additionally, only 15% of CSOs believe that sanctions imposed by the Commissioner for violating this right produce sufficiently grave consequences for responsible persons in institutions that deny citizens this right.

Practices of proactive informing the public via websites of public authorities did not improve, and there are still large disparities among them. Open data policy is not implemented adequately, and there is still insufficient effort to make available information more accessible and citizen-friendly. Overall, the results in this area are somewhat worse compared to PAR Monitor 2019/2020, the main shortcoming being non-transparent work of authorities, reflected above all in the lack of annual work reports and budget documents online. In addition, few authorities publish all the necessary data about their scope of work, organisational structure, and cooperation with civil society online, and the available data are not updated regularly.

Service delivery: Dissatisfaction of vulnerable groups in the shadow of highly positive public opinion

The results of the public perception survey showed that citizens' satisfaction with state administration services is high. Communication with the administration in the past two years has been perceived as mostly positive, i.e., it has become easier, and the time required to obtain services has shortened. On the other hand, approximately a quarter of citizens do not recognise these improvements. Also, the Government's efforts to simplify administrative procedures are largely visible to citizens, and among those who confirm this, 90% believe that such efforts are yielding results. When it comes to e-services, the vast majority of citizens consider they are easy to use. Progress in this field is shown by more than half of citizens who used e-service and who claim they completed the entire service online, from start to finish, each time they opted for this way of accessing administrative services. Additionally, the majority of citizens believe that there is an opportunity to provide feedback on the quality of administrative services (63%), and two-thirds of them consider feedback mechanisms easy to use. On the other hand, service providers do not proactively publish data on received feedback online.

However, for the third cycle of monitoring in a row, CSOs in Serbia expressed dissatisfaction regarding the accessibility of administrative services. They continue to point to the inadequate territorial distribution of providers and the insufficient accessibility of administrative services to vulnerable groups, primarily due to inadequate training of civil servants to work with these categories of the population.

Finally, public availability of information on obtaining administrative services online remains at a satisfactory level, although practices still vary depending on type of information and service provider. On the one hand, users of the analysed services can easily find details on whom to contact, what documentation needs to be submitted and what the administrative fees are. Additionally, all analysed authorities publish online information on the rights and obligations of users, including information on which data service providers obtain *ex officio*.

On the other hand, availability of complete and up-to-date procedural information on how to obtain service can still be higher. Also, citizen-friendly guidelines are not available for the entire sample, and, despite individual improvements, not all services are digitised yet.

Public financial management: Insufficient budget transparency and continuity in communicating external audit findings to citizens

Budget transparency has not improved compared to previous monitoring cycles. The level of transparency of budget documents remained low, primarily because mid-year reports on budget execution are still unavailable to the public and due to the irregular publication of monthly reports on budget execution. On the other hand, the annual reports on budget execution provide non-financial information about the performance-based budgeting expressed by policy sectors, users and programmes. Additionally, the practice of publishing citizens' guides through the budget continued; however, data on the state budget is not available on the Open Data Portal.

Limited progress was noted regarding public availability of information on public internal financial control. Consolidated annual reports are regularly prepared and published on the website of the Ministry of Finance. Additionally, the practice of ministries in publishing information on financial management and control has somewhat improved. On the other hand, the Central Harmonisation Unit does not regularly inform the public about its work, while the regularity of publishing reports on internal audit quality reviews remained partial. Parliament does not deliberate on consolidated annual reports prepared by the Ministry.

Public availability of information on public procurement has also improved. Ministries regularly published public procurement plans in this monitoring cycle, while the Public Procurement Office continued with regular publishing annual reports on implemented public procurements in Serbia. Also, the Public Procurement Portal has been rated as user-friendly and it allows data to be downloaded in an open format. Additionally, during 2021, only slightly more than 1% of public procurements were not conducted based on an open procedure. On the other hand, ministries still do not regularly disclose reports on implemented public procurements, and the same is observed for the Republic Commission for Protection of Rights in Public Procurement Procedures, as it irregularly publishes annual work reports.

The State Audit Institution continued with the good practice of communication with stakeholders, and significant progress was achieved by adopting the communication strategy. In addition, there is a dedicated job post for proactive communication and providing feedback to the public, while the practice of publishing citizen-friendly summaries of audit reports was continued. On the other hand, a slightly lower score was recorded regarding the number of used means for external communication. The State Audit Institution did not introduce an official channel for submitting complaints or initiatives by stakeholders online, and it has not developed practice of consulting CSOs when identifying risks in the public sector.

To address the identified weaknesses, this report provides actionable recommendations. As in the previous edition, a detailed list of recommendations is provided at the end of each chapter on individual PAR areas, based on findings from this monitoring cycle. Since most of the recommendations from the PAR Monitor 2019/2020, as well as from the initial 2017/2018 cycle, proved to be still highly relevant, a great number of them are repeated, and some are slightly modified for additional clarification.

LIST OF ABBREVIATIONS AND ACRONYMS

ACC	Accountability
AJARB	Administration for Joint Affairs of the Republic Bodies
ALB	Albania
AP	Action Plan
BIH	Bosnia and Herzegovina
BRA	Business Registers Agency
CHU	Central Harmonisation Unit
CPR	Central Personnel Registry
CSL	Law on Civil Servants
CSO	Civil society organisation
EC	European Commission
FMC	Financial Management and Control
FOI	Freedom of information request
GAWP	Government Annual Work Plan
GDP	Gross domestic product
GTMI	GovTech Maturity Index
HRM	Human Resource Management
HRMS	Human Resource Management Service
IA	Internal Audit
IMPG	Interministerial Project Group
KOS	Kosovo
LSGU	Local Self-Government Unit
MCI	Ministry of Culture and Information
MFA	Ministry of Foreign Affairs
MKD	North Macedonia
MNE	Montenegro
MoF	Ministry of Finance
Moi	Ministry of the Interior
MPALSG	Ministry of Public Administration and Local Self-Government
NAPA	National Academy for Public Administration
NES	National Employment Service
NPAA	National Programme for the Adoption of the Acquis
PAR	Public Administration Reform
PDC	Policy Development and Coordination
PFM	Public Financial Management

PFM RP	Public Financial Management Reform Programme
PIFC	Public Internal Financial Control
PPM and RR	Public Policy Management and Regulatory Reform
PPO	Public Procurement Office
PPS	Public Policy Secretariat
PWD	Persons with Disabilities
RGA	Republic Geodetic Authority
RSL	Republic Secretariat for Legislation
SAI	State Audit Institution
SCS	Senior Civil Servant
SCTM	Standing Conference of Towns and Municipalities
SD	Service Delivery
SIGMA	Support for Improvement in Governance and Management
SOE	State-Owned Enterprises
SRB	Serbia
SWG	Special Working Group
VAT	Value Added Tax
WB	Western Balkans
WeBER	Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform
WeBER 2.0	Western Balkan Civil Society Empowerment for a Reformed Public Administration

I. Introduction



I.1 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.

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

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.sigmaxweb.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>.

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, WeBER⁵ 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.

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 con-

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/>.

ducted 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.

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 financial management. Each chapter follows an identical structure.

In each chapter introduction, the reader is briefly introduced to the WeBER indicators used in the observed PAR area and their values for Serbia, on a scale from 0 to 5. Immediately after, a brief state of play in Serbia is given to contextualize the analysis for the observed area, based on existing secondary sources. The state of play sections largely rely on the latest European Commission report for 2022 and the SIGMA assessment from 2021, but also refer to other relevant sources. State of play is followed by the WeBER monitoring focus, describing the methodological steps in more detail, illustrating the structure of each principle and indicator, including data collection and analysis methods.

The key section of each chapter is the presentation of WeBER monitoring results, stemming from thorough and methodologically robust research conducted in Serbia. For each PAR area, indicator values, and scores of their elements, are presented for all completed WeBER monitoring cycles to date allowing easy insight and comparison of monitoring results for the three PAR monitoring exercises. A summary of results that follows for each area presents key, succinct one-page findings and trends.

Finally, section on recommendations consists of implementation status of recommendations proposed in PAR Monitors 2019/2020 and 2017/2018. For each recommendation colour codes are assigned, and explanations given as to why recommendation was assessed in certain way (e.g., fully, or partially implemented, initiated, or no action taken). Secondly, based on the detailed elaboration of findings for Serbia in this monitoring cycle, the report either repeats past recommendations that were assessed as not implemented or proposes new ones for the responsible government authorities. As certain recommendations from the previous PAR Monitors are still relevant, a few of them is repeated and some slightly modified.

II. STRATEGIC FRAMEWORK FOR PAR



II.1 WeBER indicators used in Strategic Framework for PAR and country values for Serbia

SFPAR_P1_I1: Use of participatory approaches in the development of key strategic PAR documents



SFPAR_P2&4_I1: Civil society involvement in the PAR monitoring and coordination structures



II.2 State of play in Strategic Framework for PAR and main developments since 2020

Since 2020, the further development and implementation of strategic documents dedicated to public administration reform has continued. As stated in the previous PAR Monitor, in April 2021, the Government adopted the PAR Strategy for 2021-2030, along with the Action Plan for 2021-2025, aiming to provide quality services to citizens and the economy.⁸ The Action Plan covers the areas of human resource management, service delivery, accountability and transparency. In addition, three five-year programmes for 2021-2025 were adopted, which are hierarchically subordinated to the Strategy, and refer to the areas of policy development and coordination, public financial management, and reform of the local self-government system. According to SIGMA, the Strategy was developed in cooperation with representatives of civil society organisations (CSOs), selected through a public call for a membership in the Special Working Group that was in charge of developing the Strategy.⁹

In March 2022, the Ministry of Public Administration and Local Self-Government (MPALSG) published the Annual Report for 2021 on the implementation of the PAR Strategy. As stated in the document, 82% of the results and 70% of the planned activities were achieved, while the implementation of 22% of the activities was still ongoing.¹⁰ As in the previous period, MPALSG consulted civil society when preparing this annual report. During the second meeting of the Interministerial Project Group (IMPG), held on May 24 and 25, 2022, the Draft Annual Report was discussed, and comments were made by representatives of civil society organisations that are members of the IMPG, as well as representatives of the WeBER National working group for Serbia.¹¹ As a result, a new chapter called “CSO Perception” has been added to the report, which lists the most important comments of CSOs on the results achieved and suggestions on areas that need to be improved.¹²

In June 2021, the Government adopted the new Public Financial Management Reform Programme (PFM RP) for 2021–2025, with an Action Plan for the entire implementation period. The Programme’s overall goal is to achieve a sustainable budget with a stable ratio of public debt to GDP, through better financial management and control, auditing and integration of budget planning with Government priorities and policy documents.¹³ During the public debate on the Programme, held in March and April 2021, the Ministry of Finance (MoF), which was in charge of drafting this document, received extensive comments from SIGMA and the European Commission, as well as from the World Bank, the Standing Conference of Towns and Municipalities and the European Policy Centre. Most of them are included in the text of the Programme.¹⁴ The report on the implementation of the PFM RP for 2021 indicates that eleven of the twelve activities foreseen in the Action Plan

8 Public administration reform strategy for the period from 2021 to 2030, Official Gazette no. 42/2021, available at: <https://bit.ly/3gh8HTI> (accessed 9 March 2023)

9 SIGMA, *Monitoring Report for Serbia*, 2021, page 18. Available at: <http://bitly.ws/zxEK> (accessed 9 March 2023)

10 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the Public Administration Reform Strategy for the Period 2021-2030*, page 4, available at: <http://bitly.ws/B77R> (accessed 9 March 2023)

11 Ibid, page 9.

12 This section of the report can be found on pages 72 and 73.

13 Public financial management reform programme for the period from 2021 to 2025, Official Gazette no. 70/2021. Available at: <http://bitly.ws/BoS6> (accessed 9 March 2023)

14 Ministry of Finance, *Report on the Public Debate on the Proposal of the Public Financial Management Reform Programme 2021 - 2025, with the accompanying Action Plan for the period 2021 - 2025*, page 2 - 3. Available at: <http://bitly.ws/zrF> (accessed 9 March 2023)

for 2021 were successfully implemented and that the target values for the indicators at the level of the general objective of the Programme were exceeded.¹⁵

Additionally, in July 2021, the Government adopted the Programme for the Reform of the Local Self-Government System in the Republic of Serbia from 2021 to 2025, with an Action Plan for the first three years of implementation. The Programme's main goal is to establish a system of local self-government that enables the effective exercise of citizens' rights to local self-government.¹⁶ Previously, from March 1st to March 22nd, 2021, a public debate was held on the Proposal of the Programme. Over 200 participants attended the debate, mostly representatives of local self-government units, followed by representatives of CSOs and other interested parties.¹⁷

Finally, in the field of policy development and coordination, in November 2021, the Government adopted the Programme for the Improvement of Public Policy Management and Regulatory Reform (Programme for the Improvement of PPM and RR) for the period from 2021 to 2025 with an Action Plan, which completed new strategic framework for PAR. The Programme's main goal is to improve the quality of public policy documents and regulations.¹⁸ Before the adoption of the Programme, a public debate was organised from August 27th to September 15th, 2021, and several state bodies, CSOs and the Standing Conference of Towns and Municipalities submitted comments on the Proposal of the Programme. All of the comments made by the authorities and most of those made by other interested parties were taken into account, and the explanations on the treatment of each comment are listed individually in the Report on the public debate.¹⁹ In April 2022, the Report on the implementation of the Programme for 2021 was published, but it only covers two months of implementation, as the Programme was adopted in November 2021.²⁰

The area of service provision is additionally regulated by the Programme for Simplification of Administrative Procedures and Regulations "e-Paper" for 2019-2021, which helped simplify 330 administrative procedures and establish a single register of administrative procedures.²¹ The register, which started operating in June 2021, represents a unique electronic database of all administrative procedures carried out by the state administration, with more than 2,600 procedures related to businesses available on the portal.²² In addition, from March 2023, information on state administration services related to citizens became available on the Portal.²³ Public debate on the Proposal for the Programme for Simplification of Administrative Procedures and Regulations "e-Paper" for the period 2022-2025, with an Action Plan as an integral part, was held in the period from November 24th to December 13th, 2022, via the eConsultation portal.²⁴ The report on the public debate stated that no comments were submitted by the interested parties on the Proposal.²⁵

In addition to the "e-Paper" Programme, the eGovernment Development Programme from 2020 to 2022 was implemented in the area of service delivery, which aimed to develop efficient and user-oriented administration in a digital environment. According to the Annual Report on the Implementation of the Programme for 2021, there was an increase in the number of active users of the eGovernment portal to 1,150,576 (320,000 in 2020), the number of e-services to 196 (140 in 2020), as well as the number of services performed annually on the eGovernment portal to 2,253,547 (1,100,000 in 2020).²⁶ After the *ex-post* analysis of the Programme, MPALSG prepared a Proposal for the eGovernment Development Programme from 2023 to 2025 with an Action Plan.

15 Ministry of Finance, *Report on the Implementation of the Public Financial Management Reform Programme 2021 - 2025 for the year 2021*, page 6. Available at: <http://bitly.ws/zrF> (accessed 9 March 2023)

16 Ministry of Public Administration and Local Self-Government, *Programme for the Reform of the Local Self-Government System in the Republic of Serbia for the Period from 2021 to 2025*, page 7. Available at: <http://bitly.ws/zrPw> (accessed 9 March 2023)

17 Ministry of Public Administration and Local Self-Government, *Report on the Public Debate on the Proposal of the Programme for the Reform of the Local Self-Government System in the Republic of Serbia and the Action Plan for the Period 2021-2023*. Available at: <http://bitly.ws/zrS4> (accessed 9 March 2023)

18 Programme for the Improvement of Public Policy Management and Regulatory Reform for the period 2021 - 2025, Official Gazette no. 113/21. Available at: <http://bitly.ws/zrGv> (accessed 9 March 2023)

19 The report is available at: <http://bitly.ws/zrN> (accessed 9 March 2023)

20 The report is available on the website of the Public Policy Secretariat: <http://bitly.ws/zrJ> (accessed 9 March 2023)

21 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the Public Administration Reform Strategy for the Period 2021-2030*, page 45

22 The portal is available at: <https://rap.euprava.gov.rs/privreda/home> (accessed 9 March 2023)

23 See more at: <http://bitly.ws/Hp35> (accessed 25 March 2023)

24 The Official Proposal is available at: <http://bitly.ws/Ab2A> (accessed 9 March 2023)

25 Public Policy Secretariat, *Report on the public debate on the Programme for Simplification of Administrative Procedures and Regulation "e-Paper" for the period 2022-2025*. Available at: <http://bitly.ws/Ab2A> (accessed 10 March 2023)

26 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the Public Administration Reform Strategy for the Period 2021 - 2030*, page 42, and Mysun Ann Natour, Aleksandar Stojanović, Goran Pastrović, *Ex-post Analysis of the eGovernment Development Programme in the Republic of Serbia for the period 2020 to 2022*, page 24. Available at: <http://bitly.ws/zrxx> (accessed 10 March 2023)

The public debate on the draft Programme was held from December 23rd, 2022, to January 11th, 2023, but no comments on the draft were submitted during that period.²⁷

Regarding monitoring and coordination structures, the PAR Strategy has maintained a three-tiered structure with MPALSG at the first, the Interministerial Project Group (IMPG) at the second, administrative level, and the PAR Council at the highest political level of coordination.²⁸ In addition, the practice of including CSOs in the work of IMPG continued, and the decision on establishing the group confirmed the full membership of six CSOs. From October 2021 to December 2022, four IMPG meetings were held. The previous PAR Council was formed in June 2021 and the members were relevant ministers and heads of responsible state administration bodies.²⁹ In 2021, two sessions of the Council were held.³⁰ Given that the new Government was formed in October 2022, the Government's decision on forming a new Council has not been adopted at the time of writing this report.

Finally, the online platform for monitoring PAR in Serbia (*Online Monitoring Tool*) was not regularly updated in the previous period. For example, the section on coordination structures for monitoring PAR does not contain information on all held meetings and meeting minutes from the PAR Council and IMPG sessions.³¹

II.3 What does WeBER monitor and how?

The monitoring of the Strategic Framework of 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, and 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 civil society and the public involvement in the processes of developing PAR strategic documents and participation in the monitoring and coordination structures that should ensure their purposeful implementation. A focus on inclusivity 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.

Two WeBER indicators were developed for this purpose. 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 by

27 Ministry of Public Administration and Local Self-Government, *Report on the Public Debate on the eGovernment Development Programme for the Period 2023 to 2025 with Action Plan*, page 1. Available at: <http://bitly.ws/zru5> (accessed 10 March 2023)

28 PAR Strategy for the period from 2021 to 2030, Official Gazette no. 42/2021, page 262.

29 Decision on the establishment of the PAR Council, Official Gazette no. 56/2021.

30 European Commission, *Serbia 2022 Report*, page 15. Available at: <http://bitly.ws/zxzQ> (accessed 10 March 2023)

31 The platform is available at: <http://bitly.ws/B77R> (accessed 10 March 2023)

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). During this research cycle, the new strategic framework for PAR, i.e., documents adopted in 2021, was analysed. Therefore, the analysis of this indicator for Serbia includes:

- Public administration reform strategy for the period 2021–2030 (PAR Strategy),
- Programme for the Improvement of Public Policy Management and Regulatory Reform for the period 2021–2025 (Programme for the Improvement of PPM and RR),
- Public Financial Management Reform Programme for the period 2021–2025 (PFM RP),
- Programme for the Reform of the Local Self-Government System for 2021-2025.

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 the 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.4 WeBER monitoring results

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

Table 1: Use of participatory approaches in developing key strategic PAR documents.

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. Consultations with civil society are conducted when the documents are developed	4/4	2/4	2/4
E2. Consultations with civil society are conducted in an early phase of the development of the documents	4/4	2/4	2/4
E3. Invitations to civil society to participate in the consultation are open	4/4	2/4	2/4
E4. Responsible government bodies are proactive in ensuring that a wide range of external stakeholders become involved in the process	0/2	0/2	0/2
E5. Civil society is provided complete information for preparation for consultations	2/4	2/4	2/4
E6. Comments and inputs received in the consultation process are considered by the responsible government bodies in charge of developing key PAR strategic documents	2/4	0/4	0/4
E7. Responsible government bodies publicly provide feedback on the treatment of received comments	0/2	0/2	0/2
E8. Responsible government bodies engage in open dialogue with civil society on contested questions	1/2	1/2	1/2
E9. Consultations in the development of strategic PAR documents are open to the public	4/4	2/4	2/4
Total score	21/30	11/30	11/30
Indicator value (scale 0-5)³²	4	2	2

32 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.

In this cycle, the practice of organising consultations during the development of the new strategic framework for PAR in Serbia was analysed. This analysis included the PAR Strategy, the Programme for the Improvement of PPM and RR, the PFM RP, and the Programme for the Reform of the Local Self-Government System. The results show that the practice of organising and carrying out consultations on the strategic framework has improved compared to PAR Monitor 2019/2020.

All analysed documents were adopted after extensive consultations that began in the early stages of their drafting. The participation of CSOs in the early phase was ensured by their inclusion in the work of the umbrella Special Working Group (SWG) for the development of the PAR Strategy, whose working method involved meeting in subgroups focused on individual areas of the reform. Invitations to CSOs to participate in the work of the umbrella SWG were published on the MPALSG website, on the former Office for Cooperation with Civil Society website, and on the old eGovernment portal, which is no longer in function.³³ Given that CSOs participated in the work of subgroups for areas that were further developed in the process of designing three programmes, complementary to the Strategy, the invitation to participate in the umbrella SWG was also assessed as an invitation to participate in the early phase of consultations for the development of these programmes. Special objectives and main reform directions were defined within the umbrella SWG for the three areas covered by the programmes, after which the consultations proceeded completely separately. For these purposes, the SWG for the Programme for the Reform of the Local Self-Government System was established, i.e., the Working Group for the Drafting of the Proposal for the Programme for the Improvement of the PPM and RR and the Working Group for Drafting, Monitoring and Reporting on the Implementation of the PFM RP. CSOs participated only in the work of the SWG for the Programme for the Reform of the Local Self-Government System. The text of the Programme for the Improvement of the PPM and RR states that the members were, among others, representatives of the civil sector, but there is no publicly available evidence that would support this.³⁴

Despite this, the participation of wider stakeholder groups (such as trade unions, organisations dealing with issues of gender equality or representing the interests of persons with disabilities) was not ensured, and no progress was recorded in this field compared to the previous monitoring cycle. In this cycle, the Serbian Chamber of Commerce represents an exception since its representatives took part in the SWG for the development of the PAR Strategy. Also, representatives of business organisations took part in the Working Group for the development of the Proposal for the Program for the Improvement of PPM and RR. CSOs that participated in the focus group suggested that the responsible institutions do not recognise the lack of participation of different stakeholders as an issue, so it is necessary to ensure the existence of mechanisms of positive discrimination in order to ensure their participation.³⁵

Additionally, CSOs did not receive complete information for the preparation of the consultations in each specific case. This was the case during the preparation of the PFM RP and the Programme for the Reform of the Local Self-Government System, given that CSOs did not receive draft documents and were not informed about the planned duration of the consultations. On the other hand, in the case of the PAR Strategy and the Programme for the Improvement of PPM and RR, CSOs had all the necessary information in advance.³⁶

In addition, only in the case of the PAR Strategy and the Programme for the Improvement of PPM and RR is there written proof that the responsible institutions have considered the comments and suggestions received during the consultations.³⁷ Feedback on the treatment of received comments was made public only for the Programme for the Improvement of the PPM and RR. Comments and suggestions that were accepted or remained unresolved can be found in the text of the Programme, but there is no information about those that were not accepted. For each comment, there is an explanation of how it was treated, and it is clearly stated which organisation or institution submitted it.³⁸

Additional dialogue with CSOs was held in several cases, not necessarily on disputed issues, but rather for the purposes of presenting draft documents before adoption. For example, *the PFM Policy Dialogue*, an event that the

33 Given that the Office for Cooperation with Civil Society was abolished in 2020, when its jurisdiction was taken over by the Ministry for Human and Minority Rights and Social Dialogue, the Office's website, where the invitations were located, was not available at the time of writing this report. The call is available on the MPALSG website: <http://bitly.ws/BqNJ> (accessed 10 March 2023)

34 See at: <http://bitly.ws/JnFN> (accessed 10 March 2023)

35 The focus group was held with civil society organizations on July 13th, 2022.

36 The documents were submitted together with invitations to participate in the consultations. More at: <http://bitly.ws/BqNC> and <http://bitly.ws/BqNJ> (accessed 10 March 2023)

37 This was also confirmed by civil society organizations that participated in the focus group on July 13th, 2022.

38 During the focus group it was confirmed that no CSO had comments on the Programme proposal. Comments can be found on pages 44, 45 and 46 and the Programme is available at: <http://bitly.ws/BqVe> (accessed 10 March 2023)

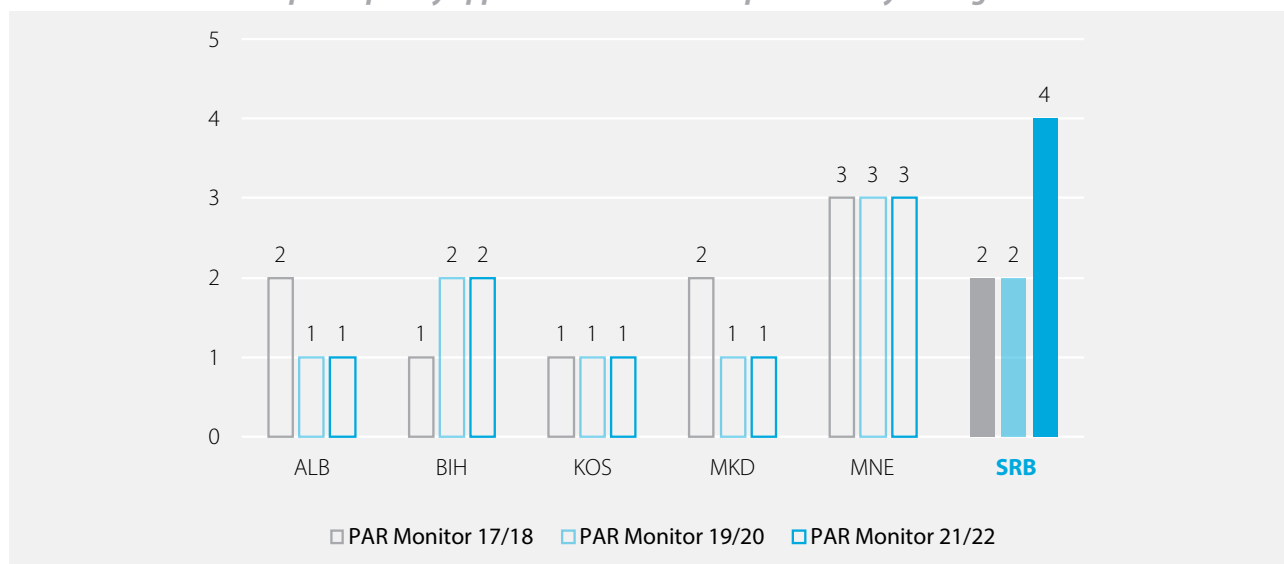
MoF has been organising for several years, was held on the last day of the public debate on the PFM RP after the final draft of the Programme had already been prepared. The dialogue was held online, and representatives of state institutions, international organisations and CSOs participated. On the other hand, MPALSG, the institution responsible for drafting the Programme for the Reform of the Local Self-Government System, initiated the involvement of the Ministry of Finance in a dialogue on certain issues related to the financing of measures from this Programme. This was done at the request of CSOs in order to resolve dilemmas that civil society representatives had. During the development of the PAR Strategy, there were no disputed issues or needs for additional dialogue. There is no evidence of additional dialogue during the consultations on the Programme for the Improvement of PPM and RR.³⁹

Finally, public debates were organised for all analysed strategic documents. Invitations to participate were posted online along with the draft documents, while communication channels for submitting comments and suggestions were clearly stated. All information about the public debates for the PAR Strategy and the Programme for the Improvement of the PPM and RR was published on the websites of the MPALSG and the PPS.⁴⁰ Information about participation in public debates on PFM RP and the Programme for the Reform of the Local Self-Government System was published on the websites of the Ministry of Finance and the MPALSG, as well as on the eGovernment Portal, and in both cases, specific e-mail addresses were provided as designated channels for submitting comments and suggestions.⁴¹

The results of the assessment of consultations carried out during the development of the new PAR strategic framework led to an increase in the final score of the indicator in this cycle. Consultations with civil society began at an early stage of drafting, while the invitations to participate in consultations were open to interested parties, as well as invitations to participate in public debates. However, there is still no initiative by relevant institutions to involve the wider groups of stakeholders in the consultations, such as trade unions or organisations dealing with issues of gender equality or disabilities. Additionally, as in previous cycles, relevant institutions do not always make feedback on the treatment of received comments public. Nevertheless, significant progress was recorded compared to the previous monitoring cycle, so the indicator's value for Serbia in this cycle is 4.

■ How does Serbia do in regional terms?

Chart 1: Use of participatory approaches in the development of key strategic PAR documents



The regional PAR Monitor report with results for all WB administrations is available at: www.par-monitor.org

³⁹ In the case of the PAR Strategy, this was confirmed by the CSOs that participated in the focus group. On the other hand, representatives of the Public Policy Secretariat were not available for interviews, and CSOs that participated in the focus group did not have information about potential disputed issues.

⁴⁰ Calls for participation in the consultations for the drafting of these two documents are available at: <http://bitly.ws/Brhp> and <http://bitly.ws/Brhw> (accessed 10 March 2023)

⁴¹ The public debate notice for the Public Financial Management Reform Programme is available at: <http://bitly.ws/Briu> and <http://bitly.ws/Brj3>. The notice of public debate for the Programme for the Reform of the Local Government System is available at: <http://bitly.ws/Brjm> and <http://bitly.ws/Brjt> (accessed 10 March 2023)

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 co-ordination structures at both the political and administrative levels to steer the reform design and implementation process

Table 2: Civil society involvement in the PAR monitoring and coordination structures

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. Administrative structures for PAR coordination and monitoring foresee an involvement of CSOs	2/2	2/2	2/2
E2. Political level structures for PAR coordination foresee an involvement of CSOs	0/2	0/2	0/2
E3. Format of CSO involvement in administrative structures for PAR coordination and monitoring	4/4	4/4	4/4
E4. Format of CSO involvement in political structures for PAR coordination and monitoring	0/4	0/4	0/4
E5. Involvement of CSOs is achieved based on an open competitive process	2/4	2/4	0/4
E6. Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	0/4	0/4	0/4
E7. The format of meetings allows for discussion, contribution, and feedback from CSOs	2/4	2/4	2/4
E8. CSOs get consulted on the specific measures of PAR financing	0/2	0/2	0/2
Total score	10/26	10/26	8/26
Indicator value (scale 0-5)⁴²	2	2	1

The participation of CSOs in the PAR coordination and monitoring structures is foreseen in the PAR Strategy. The MPALSG is responsible for the first level of coordination (expert and operational tasks), while the Interministerial Project Group (IMPG) is responsible for the second, administrative level of coordination. PAR Council is on the third, political level.⁴³ The Strategy envisages the participation of CSOs in the work of IMPG, and the decision on the establishment of the group lists six member CSOs: the European Policy Centre, the Belgrade Open School, the National Coalition for Decentralisation, the Centre for Local Democracy, the Centre for Research in Politics “Argument” and the Association of Citizens for Democracy and Civic Education “Citizens Initiative”. In addition, the Standing Conference of Towns and Municipalities (SCTM) became a member of IMPG.⁴⁴ A review of the publicly available minutes from the first two meetings confirmed the involvement of CSOs in the work of the IMPG.⁴⁵

On the other hand, the Strategy does not envisage the participation of CSOs at the political level of coordination and monitoring, that is, in the work of the PAR Council. Nevertheless, it should be emphasised that a representative of SCTM is a full-rights member of the Council, which is a novelty compared to previous monitoring cycles. However, given that SCTM is an association of towns and municipalities in the Republic of Serbia, whose members are representatives of local self-governments, and whose interests it represents, no progress was recorded in this area compared to PAR Monitor 2019/2020. However, the Strategy envisages the possibility that the PAR Council invites representatives of CSOs who are IMPG members to participate in

42 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.

43 Public administration reform strategy for the period from 2021 to 2030, Official Gazette no. 42/2021, page 259.

44 The decision establishing the IMPG is available at: <http://bitly.ws/Abpq> (accessed 13 March 2023)

45 The minutes are available at: <http://bitly.ws/Abpq> (accessed 13 March 2023)

the Council's meetings once a year.⁴⁶ During the time of writing this report, there was no evidence that this possibility was utilised.

The participation of CSOs in the work of the IMPG was ensured on the basis of an open call, initially organised to select CSOs for participation in the SWG for the development of the PAR Strategy.⁴⁷ Based on the invitation, the six CSOs mentioned above were selected and became members of the umbrella SWG. MPALSG sent an invitation to the same organisations to express interest in the IMPG membership, with the idea that the organisations that participated in the development of the Strategy should participate in monitoring its implementation. Given that the call set only basic criteria for CSO application (such as areas of expertise, experience in projects, etc.), the openness of the selection process was assessed as satisfactory, even though the public call for membership in the IMPG was not repeated.

Regarding the regularity of the meetings of the structures for coordination and monitoring, no progress was recorded compared to the previous two cycles of the PAR Monitor. In the observed period, the IMPG met on October 8th, 2021, and then on May 25th, 2022.⁴⁸ Similarly, the meetings of the PAR Council were held on June 10th and December 23rd, 2021. Since more than six months passed between the two meetings, the work of the IMPG, a body in which representatives of CSOs participate as full members, was once again assessed as irregular.

In addition, the Rules of Procedure of IMPG allow all members, CSOs included, to propose the agenda of the meetings or its items.⁴⁹ However, CSOs which are members of the IMPG, and which participated in the focus group, expressed several objections to the IMPG's working methods. Criticisms included that it is unknown what the final treatment of their comments and suggestions is and that they do not trust they have essential influence on decision-making within the IMPG, i.e., that decisions are made at higher levels, while their participation in the work of the IMPG is just a formality. It was also suggested that the IMPG work format could be modified to enable working in smaller groups that will be more thematically focused, as opposed to working in a plenum.⁵⁰ Therefore, although the Rules of Procedure formally enable the full participation of CSOs, progress has yet to be recorded in this field in comparison to the previous cycles of monitoring.

Finally, CSOs were not consulted on the financing measures of PAR through their participation in the IMPG. The available minutes from IMPG sessions suggest that such issues were mostly not on the agenda, meaning, CSOs did not have the opportunity to discuss them. Representatives of CSOs who participated in the focus group confirmed that this issue was not discussed at the meetings. IMPG members received basic information about PAR financing without influencing the decisions in this domain.⁵¹

Overall, no progress was recorded in the assessment of CSO participation in the PAR monitoring and coordination structures in relation to the previous two monitoring cycles, and the value of this indicator remained 2. CSOs are still represented only in the IMPG, while only representatives of the state authorities and a representative of the SCTM are included in the PAR Council. Nevertheless, full-right membership of CSOs in IMPG and the open call for their participation were assessed positively. Still, the meetings remain irregular, and there has been no progress when it comes to the practice of consulting CSOs on PAR financing measures.

46 Public administration reform strategy for the period from 2021 to 2030, Official Gazette no. 42/2021, page 261.

47 The public call for CSOs is available at: <http://bitly.ws/BqNJ> (accessed 13 March 2023)

48 Minutes from the first two meetings are available at: <http://bitly.ws/Abpq>. After the monitoring period, two more IMPG meetings were held, and news about them are available at: <http://bitly.ws/zs2g> and <http://bitly.ws/zs2A> (accessed 14 March 2023)

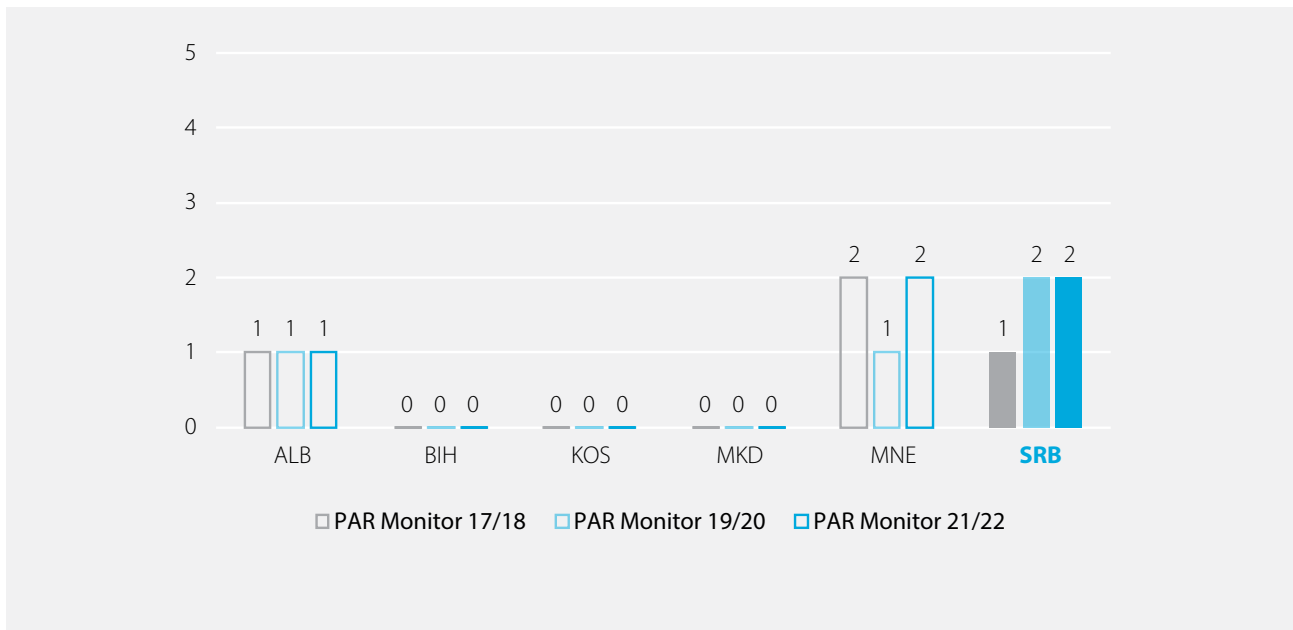
49 Rules of Procedure of the Interministerial Project Group, Article 7. Available at: <http://bitly.ws/Abpq> (accessed 14 March 2023)

50 Focus group with civil society organisations was held on July 13th, 2022.

51 Ibid.

■ How does Serbia do in regional terms?

Chart 2: Civil society involvement in the PAR monitoring and coordination structures



The regional PAR Monitor report with results for all WB administrations is available at: www.par-monitor.org

II.5 Summary results for the Strategic Framework for PAR area

The practice of involving CSOs in the development of strategic documents on PAR has been improved compared to previous monitoring cycles. Civil society was consulted on all four analysed strategic documents in the early stages of their preparation. The invitations for the participation of CSOs were open, but this cycle also recorded a low level of proactivity of the relevant institutions in terms of inviting a wider range of interested parties, such as trade unions or organisations that deal with issues of gender equality and issues of importance for people with disabilities. Additionally, the practice of the relevant institutions in the consultation process was not uniform for all four strategic documents. CSOs did not receive complete information which was necessary for them to prepare for the consultations on the PFM RP as well as on the Programme for the Reform of the Local Self-Government System, while only in the cases of the PAR Strategy and the Programme for the Improvement of PPM and RR is there evidence that the institutions considered the comments and suggestions received during consultations. However, there is no public feedback on the treatment of comments received, except for the Programme for the Improvement of the PPM and RR, where comments and suggestions can be found in the text of the Programme. Additional dialogue was held on the PFM RP, but only at the later stage during public debate, while MPALSG proactively included the MoF in a dialogue with CSOs regarding additional questions that civil society representatives raised during the drafting of the Program for the Reform of the Local Self-Government System. In the case of the PAR Strategy, there were no disputed issues, and there is no evidence that such dialogues were organised for the Programme for the Improvement of the PPM and RR. The involvement of the general public in these processes was ensured by organising public debates for all four strategic documents, with clearly indicated channels for submitting comments and suggestions.

Regarding the participation of civil society in the PAR coordination and monitoring structures, no progress was recorded compared to the previous cycles. CSOs are not involved in the work of the PAR Council. On the other hand, CSOs are full-right members of the Interministerial Project Group, whose representatives were elected based on an open call. However, CSO representatives who are members of the IMPG presented their objections to the work of IMPG; that is, they point out that they do not have a substantial influence on decision-making within this body, that the final treatment of their comments and suggestions remains unexplained, as well as that they were not consulted on measures for financing the reform. In addition, the IMPG and the PAR Council meetings are held irregularly.

II.6 Recommendations for Strategic Framework for PAR

Tracking recommendations from PAR Monitor 2019/2020

Colour coding scheme for tracking recommendation

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Recommendation	Status	Comment
1. Institutions responsible for PAR strategic framework should organise consultations with CSOs as early as possible in the development process of strategic documents to gather substantive inputs before the final drafts are produced, i.e., before the main policy directions are decided upon.	Fully implemented	The early involvement of CSOs in the process of drafting the PAR Strategy, the Programme for the Improvement of the PPM and RR, the PFM RP and the Programme for the Reform of the Local Self-Government System was ensured by participation in the Special Working Group for the Development of the PAR Strategy.
2. Institutions responsible for PAR strategic framework should broadly advertise consultations with announcements posted at least on 1) one's own website, 2) the eGovernment portal, 3) website of the institution responsible for cooperation with civil society, and 4) through available social media channels.	No action taken	None of the strategic documents analysed in this chapter met all four criteria; that is, all four communication channels were not used when publishing the call for consultations.
3. Institutions responsible for PAR strategic framework need to publicly release reports on every consultation round (early, or late), clearly addressing all received inputs individually, and explaining the reasons behind acceptance or rejection.	Partially implemented	Reports on the early stages of consultation are only available for some analysed strategic documents. In the case of the PAR Strategy, comments can be found in the meeting minutes, while in the case of the Programme for the Improvement of the PPM and RR, they are listed in the text of the Programme. On the other hand, reports on the conducted public debates are available on the official websites of the institutions responsible for the development of PAR strategic documents, along with the reasons for accepting or rejecting comments and suggestions. ⁵²
4. Institutions responsible for PAR strategic framework should proactively and regularly involve a diverse group of stakeholders representing various interests relevant to the PAR policy.	No action taken	During the monitoring cycle, it was determined that a wider range of interested parties, i.e., representatives of civil society representing different interests, was not included in the process of drafting the four strategic documents for PAR.

⁵² Reports on the conducted public debates are available on the official websites of the MPALSG, the Ministry of Finance and the Public Policy Secretariat <http://bitly.ws/AaZS>, <http://bitly.ws/zrRF>, <http://bitly.ws/zrRN>, <http://bitly.ws/Ab2A>, <http://bitly.ws/zru5>, <http://bitly.ws/zrS4> (accessed 14 March 2023)

<p>5. To ensure that CSO views are meaningfully considered at both levels of the PAR monitoring and coordination structure, MPALSG should, in the mid-term, consider the formal membership of at least one CSO in the PAR Council.</p>	<p>No action taken</p>	<p>CSOs have representatives in the IMPG, the administrative level of reform management. The members of the PAR Council are mainly public officials and other representatives of administrative bodies. However, it should be emphasised that the PAR Strategy foresees the membership of SCTM in the PAR Council, in addition to representatives of state institutions. Besides that, the Strategy envisages the possibility that the PAR Council could, once a year, invite CSO representatives from the IMPG to participate in the work of the Council.⁵³</p>
<p>6. MPALSG should place greater focus on the concrete issues and problems deriving from the current PAR AP implementation when defining IMPG sessions' agenda, especially on the most pressing issues related to citizen-facing aspects of administration: openness, transparency, responsiveness of administration and external accountability.</p>	<p>No action taken</p>	<p>Minutes from the analysed sessions of the IMPG, which are available online, indicate that none of these issues were given special attention, nor were the members of the IMPG discussing them.⁵⁴</p>
<p>7. MPALSG should ensure consistency of the IMPG calendar, with at least one session every six months and, ideally, a session every three months.</p>	<p>No action taken</p>	<p>The first meeting was held in October 2021, the second in May 2022, and the third and fourth in December 2022, just a few days apart, which indicates irregularity in holding meetings.</p>
<p>8. MPALSG should ensure that issues of concern for CSOs are integrated into IMPG sessions' agenda as much as possible by asking in advance CSO members of this body to candidate agenda items.</p>	<p>Partially implemented</p>	<p>The Rules of Procedure of IMPG stipulate that each member can propose the agenda of the session or some of its points.⁵⁵ On the other hand, there is no evidence that CSOs proposed agenda items because they are only listed in the minutes, without details on who proposed them.</p>
<p>9. Format and procedures of the new IMPG, under the PAR Strategy 2021-2030, should ensure more substantive, in-depth discussions on PAR areas or topics. This can be done, for instance, by introducing a possibility in the rules of procedures to convene in smaller groups and on specific topics, and if necessary, or requested by CSOs, to hold IMPG sessions more frequently.</p>	<p>Fully implemented</p>	<p>The Rules of Procedure of the IMPG allow gathering in smaller groups to discuss specific topics. This was the format of the third IMPG meeting, where human resources management topics were mainly discussed.</p>

53 AR Strategy for the period 2021–2030, p. 265, available at: <https://bit.ly/2RvxuuW> (accessed 14 March 2023).

54 IMPG meeting minutes, available at: <http://bitly.ws/Abpq>, <http://bitly.ws/zs2g>, <http://bitly.ws/zs2A> (accessed 14 March 2023)

55 The Rules of Procedure of the IMPG are available at: <http://bitly.ws/Abpq> (accessed 15 March 2023)

PAR Monitor 2021/2022 recommendations

Two PAR Monitor 2019/2020 recommendations were evaluated as fully implemented (1 and 9). Other recommendations, including those marked as partially implemented, were repeated and modified in order to clarify or specify them. In this report, three new recommendations were made to the relevant authorities.

Repeated and modified recommendations from PAR Monitor 2019/2020

1. Institutions responsible for PAR strategic framework should broadly advertise consultations with announcements posted at least on 1) one's own website, 2) the eGovernment portal, 3) website of the institution responsible for cooperation with civil society, and 4) through available social media channels.
2. Institutions responsible for PAR strategic framework need to publicly release reports on every consultation round (early, or late), clearly addressing all received inputs individually, and explaining the reasons behind acceptance or rejection.
3. Institutions responsible for PAR strategic framework should proactively and regularly involve a diverse group of stakeholders representing various interests relevant to the PAR policy. In particular, mechanisms of positive discrimination should be ensured to enable the participation of a wider range of actors (unions, organisations dealing with issues of gender equality and issues of importance for persons with disabilities) in the process of drafting strategic documents.
4. To ensure that CSO views are meaningfully considered at both levels of the PAR monitoring and coordination structure, MPALSG should, in the mid-term, consider the formal membership of at least one CSO in the PAR Council.
5. MPALSG should place greater focus on the concrete issues and problems deriving from the current PAR AP implementation when defining IMPG sessions' agenda, especially on the most pressing issues related to citizen-facing aspects of administration: openness, transparency, responsiveness of administration and external accountability.
6. MPALSG should ensure consistency of the IMPG calendar, with at least one session every six months and, ideally, a session every three months.
7. MPALSG should ensure that issues of concern for CSOs are integrated into IMPG sessions' agenda as much as possible by asking in advance CSO members of this body to candidate agenda items. In such cases, the meeting minutes should highlight which agenda items were proposed by CSOs.

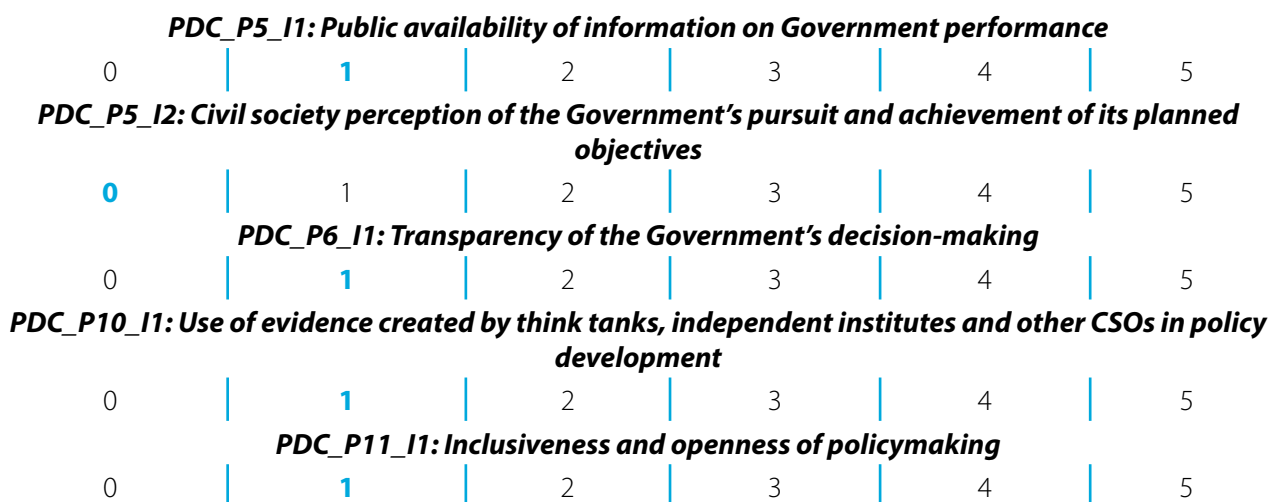
New recommendations 2021/2022

8. Inclusion of a wider group of stakeholders representing different interests relevant to the PAR policy (recommendation number 1) MPALSG can carry out as necessary, i.e., during the process of developing strategic documents, in the stage of drafting the impact assessments, outside the formal framework of membership in working groups. Modalities of involvement can be focus groups, consultative meetings, surveys and such.
9. The Ministry of Finance should organise consultations with interested parties during the preparation of the PFM RP, both in the early stages of preparation and during the process of defining and elaborating measures and activities of the Programme. Although commendable, the long-standing practice of holding the PFM Policy Dialogue usually comes at a stage when the text of the PFM RP Proposal has already been drafted, which limits the effect and purpose of such additional consultations.
10. Since the PAR Strategy is an umbrella reform document, the responsible authorities should ensure that the members of the umbrella working group for the development of the PAR Strategy are also invited to become members of the working groups formed for the purpose of drafting public policy documents arising from the Strategy (programmes). In this way, continuity is achieved in the development of the strategic framework. At the same time, civil society organisations that are members of the umbrella working group can thus be involved in the further development of the strategic framework in the areas in which they have interests and knowledge.

III. POLICY DEVELOPMENT AND COORDINATION



III.1 WeBER indicators used in Policy Development and Coordination and country values for Serbia



III.2 State of play in Policy Development and Coordination and main developments since 2020

The main development is the adoption of the Programme for the Improvement of Public Policy Management and Regulatory Reform (Programme for the Improvement of PPM and RR) for 2021-2025 with an Action Plan.⁵⁶ This strategic document was adopted in November 2021 and is hierarchically subordinated to the PAR Strategy. The Programme's main goal is to improve citizens' quality of life and facilitate business operations by improving the quality of public policies. In April 2022, the Government also adopted the first Report on the implementation of the Programme for 2021, which refers to the first two months of the implementation.⁵⁷

The report states that the implementation of the current Regulation on the methodology of public policy management, impact assessment of public policies and regulations and the content of individual public policy documents resulted in an optimised planning framework in three planning areas - public informing, public administration, and education, leading to a reduction in the number of public policy documents and the establishment of a clear hierarchy.⁵⁸ In addition, the share of adopted laws that contain a complete impact assessment in the total number of adopted laws has increased, from 30.4% in 2020 to 47.4% in 2021, as well as the share of decrees that contain a complete impact assessment, from 58.3% in 2020 to 65.1% in 2021.⁵⁹ On the other hand, a setback was observed regarding public policy documents - only 47% of them contained a complete impact assessment in 2021, which is three percentage points lower than in 2020.⁶⁰ In this regard, the EC once again emphasised that the methodology for impact assessments of policies should be consistently applied, as well as that the practice of the Public Policy Secretariat (PPS) of accepting "partial compliance" with the methodology "limits the degree of alignment with legal requirements and improvement in the overall quality of the impact assessments".⁶¹

When it comes to the public scrutiny of the Government's work, despite the publication of the annual Report on the Implementation of the Programme for the Improvement of PPM and RR, the Government's website does not allow direct access to reports monitoring the implementation of other key planning documents of the Government. The EC states that authorities are increasingly submitting public policy documents through

⁵⁶ Programme for the improvement of public policy management and regulatory reform for 2021-2025 with an Action Plan, Official Gazette no. 113/21. Available at: <http://bitly.ws/zrrG> (accessed 19 April 2023)

⁵⁷ Public Policy Secretariat, *Report for 2021 on the implementation of the Programme for the Improvement of Public Policy Management and Regulatory Reform for 2021-2025 with the Action Plan*, p. 12. Available at: <http://bitly.ws/zrrJ> (accessed 19 April 2023)

⁵⁸ Ibid.

⁵⁹ Ibid, p. 1.

⁶⁰ Ministry of Public Administration and Local Self-Government, *Annual Report for the year 2021 on the implementation of the Strategy of the Regional Government 2021 - 2030*, p. 23. Available at: <http://bitly.ws/B77R> (accessed 20 April 2023)

⁶¹ European Commission, *Serbia 2022 Report*, p. 15. Available at: <http://bitly.ws/zxzQ> (accessed 19 April 2023)

the Unified Information System, but that the number of published implementation reports remains limited.⁶² Similarly, SIGMA points out that the Government's decision-making remained insufficiently transparent in 2021 since the agendas of the Government sessions are not published, nor are all adopted decisions.⁶³

The EC believes that evidence-based policy development still needs to be strengthened, given that the collection of administrative data and its systematic use must be improved in practice.⁶⁴ Deficiencies from previous years are still present when it comes to the systematic implementation of the Law on the Planning System, and there are still no mechanisms to ensure that the comments of the PPS are considered when drafting public policy documents.⁶⁵

In June 2022, the PPS announced the beginning of the drafting of proposals for two regulations – one for the methodology of public policy management, and another for the impact assessment of regulations, which will repeal the current Regulation on the Methodology of Public Policy Management, the Impact Assessment of Public Policies and Regulations, and the Content of Individual Public Policy Documents. Based on the study conducted by the PPS, two separate regulations are necessary in order to ensure a better understanding and implementation of the legal framework on the planning system.⁶⁶ The PPS has also prepared a Test of Impact on Gender Equality with the accompanying Implementation Guidelines. It assesses whether a proposed law or other regulation will affect women and men differently and whether it will affect gender equality.⁶⁷

One of the main novelties regarding the inclusiveness and openness of policymaking is the eConsultation portal, which began operating in December 2021. This was preceded by the Government's decision on the establishment of the Portal from June 2021, which prescribed the obligation for all state administration bodies to publish all relevant information on consultation processes and public debates within their jurisdiction on the Portal.⁶⁸ It allows citizens to be informed of consultations for all regulations and public policy documents from the beginning of their drafting in one place. By May 2022, 14 administrative bodies have initiated 20 consultations on the Portal, six of which have been completed, with 105 users registered.⁶⁹ According to the data from the Annual Report on the implementation of the PAR Strategy, in 2021, there was an increase in the number of consultations conducted for adopted laws, decrees, and public policy documents.⁷⁰ Consultations were conducted for 44% of adopted laws (35% in 2020), 21% of decrees (11% in 2020) and 96% of public policy documents.⁷¹

reater involvement of the civil sector in the decision-making process at all levels of government.⁷² Acknowledging that the Strategy was adopted, and expressing satisfaction with the strategic framework for cooperation between the government and CSOs, the EC states that it is necessary to improve its implementation.⁷³ Finally, following the adoption of the Guidelines for the Inclusion of Civil Society Organisations in Working Groups for the Preparation of Draft Policy Documents and Regulations in February 2022, there has been an increase in the number of public calls to CSOs for membership in working groups, according to the Strategy, from 3 in 2020 to 11 in 2021.⁷⁴ Nevertheless, the EC states that CSOs maintain that the time provided for consultations is short and that their comments on the draft regulations are not given enough attention.⁷⁵

62 Ibid.

63 SIGMA, *Monitoring Report for Serbia*, 2021, p. 29. Available at: <http://bitly.ws/zxEK> (accessed 19 April 2023)

64 European Commission, *Serbia 2022 Report*, p. 15.

65 Ibid.

66 An additional explanation on the reasoning behind this decision, as well as the starting point for the preparation of these documents, are available on the PPS website: <http://bitly.ws/Dhtl> (accessed April 20, 2023)

67 PPS prepared this Test and accompanying Guidelines in cooperation with Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and UN Women. The final versions of the Test and Guidelines are available at: <http://bitly.ws/z9Ci> (accessed 20 April 2023)

68 Decision on the establishment of the eConsultation Portal, Official Gazette no. 62/2021-49. Available at: <http://bitly.ws/Dhvq> The portal is available at: <https://ekonsultacije.gov.rs/> (accessed 20 April 2023).

69 Government of the Republic of Serbia, *Report on the results of the implementation of the Action Plan for the implementation of the Government Program 2020-2022*, p. 7. Available at: <http://bitly.ws/Dhwr> (accessed 20 April 2023)

70 Ministry of Public Administration and Local Self-Government, *Annual Report for the year 2021 on the implementation of the PAR Strategy for 2021 - 2030*, p. 22

71 European Commission, *Serbia 2022 Report*, p. 14.

72 Strategy for creating an enabling environment for the development of civil society for 2022-2030, Official Gazette no. 23/2022. Available at: <http://bitly.ws/Dh14> (accessed 20 April 2023)

73 European Commission, *Serbia 2022 Report*, p. 14.

74 Strategy for creating an enabling environment for the development of civil society for 2022-2030, Official Gazette no. 23/2022. The data refer only to public calls published through the Ministry for Human and Minority Rights and Social Dialogue and the Office for Cooperation with Civil Society (which no longer exists since the Ministry took over its jurisdiction), and not to the total number of public calls for which there is no data.

75 European Commission, *Serbia 2022 Report*, p. 14.

III.3 What does WeBER monitor and how?

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. The first indicator measures the extent of openness and availability of information about the 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 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 between the end of March to the beginning of September 2022, using an online surveying platform.⁷⁶ 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 as representative as possible, additional boosting was done where needed to increase overall responses.

The third indicator measures the transparency of decision-making by the government, 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 - from August 1st, 2021, to February 1st, 2022 - while the timeliness of the publication of materials was observed was in the period of three months from the start of monitoring, ending on May 1st, 2022.

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 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, *ex-ante* and *ex-post* policy analyses, and impact assessments in a sample of three policy areas.

⁷⁶ The survey of CSOs was administered through an anonymous, online questionnaire. The data collection method was CASI (computer-assisted self-interviewing).

Finally, the fifth indicator, focusing on the quality of involvement of the public in policymaking through public consultations, was modified in this monitoring cycle. It includes not only perceptions of CSOs collected by online surveys, but also additional qualitative data gathered through the analysis of a sample of public consultations and assessments of online governmental portals used for public consultations. Qualitative analysis in this cycle observes the scope and impact of public consultations on policy documents and legislation adopted in the second half of 2021, the availability and quality of reporting on public consultations, functionalities of the public consultation portals, and proactiveness of information provision by the responsible institutions.

III.4 WeBER monitoring results

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

Table 3: Public availability of information on Government performance

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. The government regularly publishes written information about its activities	4/4	0/4	0/4
E2. The information issued by the government on its activities is written in an understandable way	0/2	0/2	0/2
E3. The information issued by the Government is sufficiently detailed, including both quantitative data and qualitative information and assessments	2/4	0/4	0/4
E4. The information issued by the Government includes assessments of the achievement of concrete results	0/4	0/4	0/4
E5. The information issued by the Government about its activities and results is available in open data format(s)	0/2	0/2	0/2
E6. The information issued by the Government about its activities and results contains gender segregated data	0/2	0/2	0/2
E7. Share of reports on Government strategies and plans which are available online	1/2	2/2	0/2
Total score	7/20	2/20	0/20
Indicator value (scale 0-5)⁷⁷	1	0	0

The Government of Serbia has made certain, albeit limited, progress regarding the public availability of information on its performance. Unlike in the previous monitoring cycle, when the annual reports on implementation of the Government's Annual Work Plan were not published, reports for 2019 and 2020 were publicly available in this cycle at the time of monitoring (January 2022).⁷⁸ However, unlike the Report for 2020, which is easily accessible on the Government's website in the section "Documents on the Government's performance" with just a few clicks from the home page, the report for 2019 was published together with a large number of other documents in a separate section which is not easily accessible. Additionally, as in previous cycles, the Government regularly published press releases during 2020 and 2021.

Although information about the Government's activities is available, it is often not presented as citizen friendly. Press releases are generally written concisely, in plain language and without unnecessary bureaucratic terminology, which is not the case with reports on the Government's performance. Namely, the reports are entirely written in technocratic language and do not contain summaries of the Government's activities written in a manner suitable for the general public. Moreover, instead of presenting the activities of the Government

⁷⁷ 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.

⁷⁸ Given that the legal deadline for the publication of the Report on the Government's performance for 2021 was on May 1st, 2022, at the time of monitoring, this report was not taken into consideration, although it was not publicly available yet.

as a collective body, the reports were compiled as a collection of reports of individual administrative bodies. It is interesting that the part of the report that refers to the General Secretariat of the Government, unlike those that refer to other bodies, is the only one that does not contain a summarised description of activities, which is expected to contain activities of the Government. When it comes to the activities of other bodies, despite the existence of such summaries, they are not citizen friendly as well.

A review of the annual reports on Governments' work shows that they are still extensive, detailed, and contain a lot of qualitative and quantitative data. The reports provide information on legislative activities, programmes and projects implemented by individual ministries, special organisations and government services. Regarding the Government's activities, only the legal acts adopted by the Government or submitted to the National Assembly for adoption are shown. At the same time, the reports contain almost no qualitative information. The same can be stated regarding the reporting on the achieved results. While the annual reports contain information on the results of programme budget implementation by individual administrative bodies,⁷⁹ there are almost no references to the performance of the Government as a whole. Finally, another shortcoming persisting across monitoring cycles is the absence of any information on the Government's activities and results in open data format.

Also, annual reports contain almost no gender-segregated data, with only few exceptions. For example, in the 2019 report, the Ministry of Labor, Employment, Veterans and Social Affairs segregates data based on gender for a single project, while the Ministry of Health does it in several places in both analysed reports. As for the 2020 report, in addition to the Ministry of Health, the Ministry of Economy provided gender-specific data into the description of an entrepreneurship support project, while the Ministry of Public Administration and Local Self-Government also provided such information for a single activity. However, these exceptions refer exclusively to individual ministries and do not change the general conclusion that information on government activities and results is not classified based on gender, as in the previous two monitoring cycles.

Finally, the public availability of reports on other planning documents of the Government decreased compared to the PAR Monitor 2019/2020. While in the previous cycle, it was not possible to find a publicly available report for only one out of five observed planning documents, this time it was not possible with two.⁸⁰ In addition to the Report on the Action Plan for the Implementation of the Government Programme, which was also unavailable in the previous cycle,⁸¹ the reports on the implementation of the National Programme for the Adoption of the EU Acquis (NPAA) were not published regularly as well. The last available report during the monitoring referred to July - September 2019.⁸² As a result, the availability of reports on planning documents is partial, and therefore insufficient for complete and timely informing of the public.

Despite the increase in the indicator's value from 0 to 1, there are no essential changes compared to the previous two monitoring cycles. The slight progress is solely the result of published reports on the Governments' performance for two consecutive years, but the shortcomings of these reports have remained unchanged. The reports are the sums of individual administrative bodies' reports, not the results of the Government as a collective body. They are almost entirely written in bureaucratic language, and no citizen-friendly parts summarise the Government's activities and results. Additionally, the information from these reports is not available in an open format or classified based on gender. Finally, fewer reports on the implementation of other government planning documents were publicly available in this cycle.

79 Among the administrative bodies, examples of good practice are the Ministry of Environmental Protection, Republic Hydrometeorological Service and a few other bodies that present implemented programmes and projects in tabular form, with a very detailed description of the achieved results.

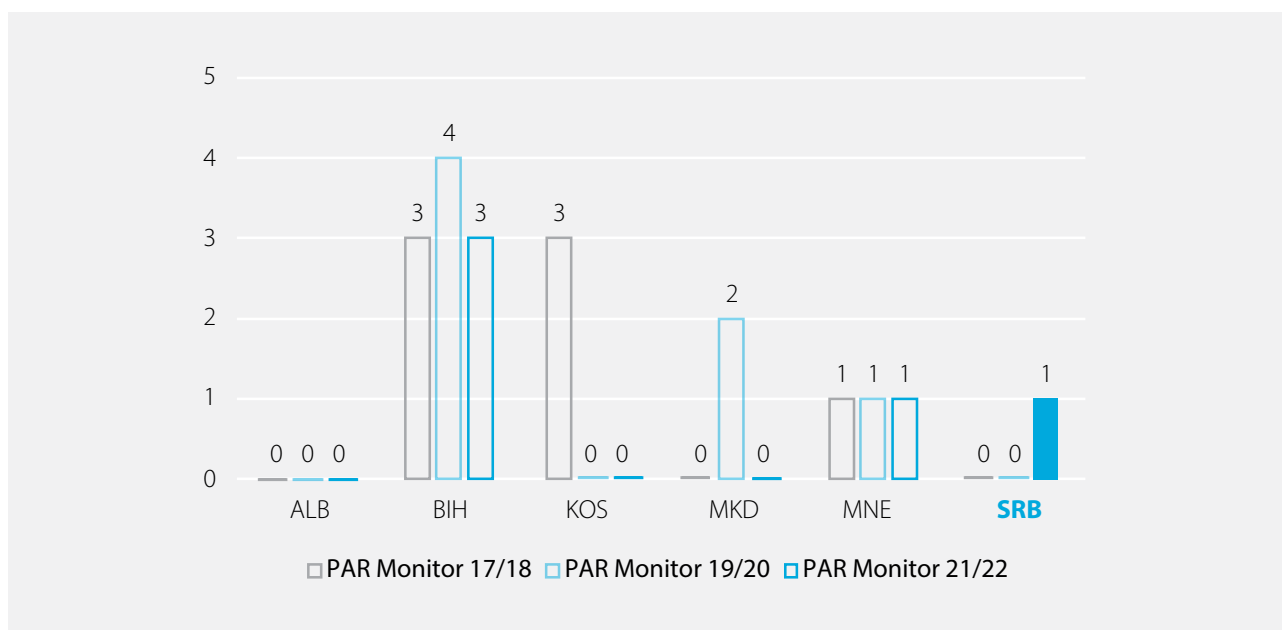
80 The sample includes, in addition to the Government Annual Work Plan, the Government Programme with an Action Plan, the Economic Reforms Programme, the National Programme for the Adoption of EU Acquis, as well as the Fiscal Strategy.

81 The Report on the results of the implementation of the Action Plan for the Implementation of the Government Programme for 2020 - 2022 was adopted at the Government session held on June 30th, 2022.

82 It is important to emphasise that after the formation of the new Government in October 2022, the Report on the Implementation of the National Program for the Adoption of the EU Acquis for the third and fourth quarters of 2022 was published.

How does Serbia do in regional terms?

Chart 3: Public availability of information on Government performance



The regional PAR Monitor report, with results for all WB administrations, is available at: www.par-monitor.org

Table 4: Civil society perception of the Government's pursuit and achievement of its planned objectives

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. CSOs consider government's formal planning documents as relevant for the actual developments in the individual policy areas	0/2	0/2	0/2
E2. CSOs consider that the Government regularly reports to the public on progress against the set objectives	0/4	0/4	0/4
E3. CSOs consider that official strategies determine governments' or ministries' action in specific policy areas	0/2	0/2	0/2
E4. CSOs consider that the ministries regularly publish monitoring reports on their sectoral strategies	0/4	0/4	0/4
E5. CSOs consider that the EU accession priorities are adequately integrated into the government's planning documents	0/2	0/2	0/2
E6. CSOs consider that the Government's reports incorporate adequate updates on the progress against the set EU accession priorities	0/2	0/2	0/2
Total score	0/16	0/16	0/16
Indicator value (scale 0-5)⁸³	0	0	0

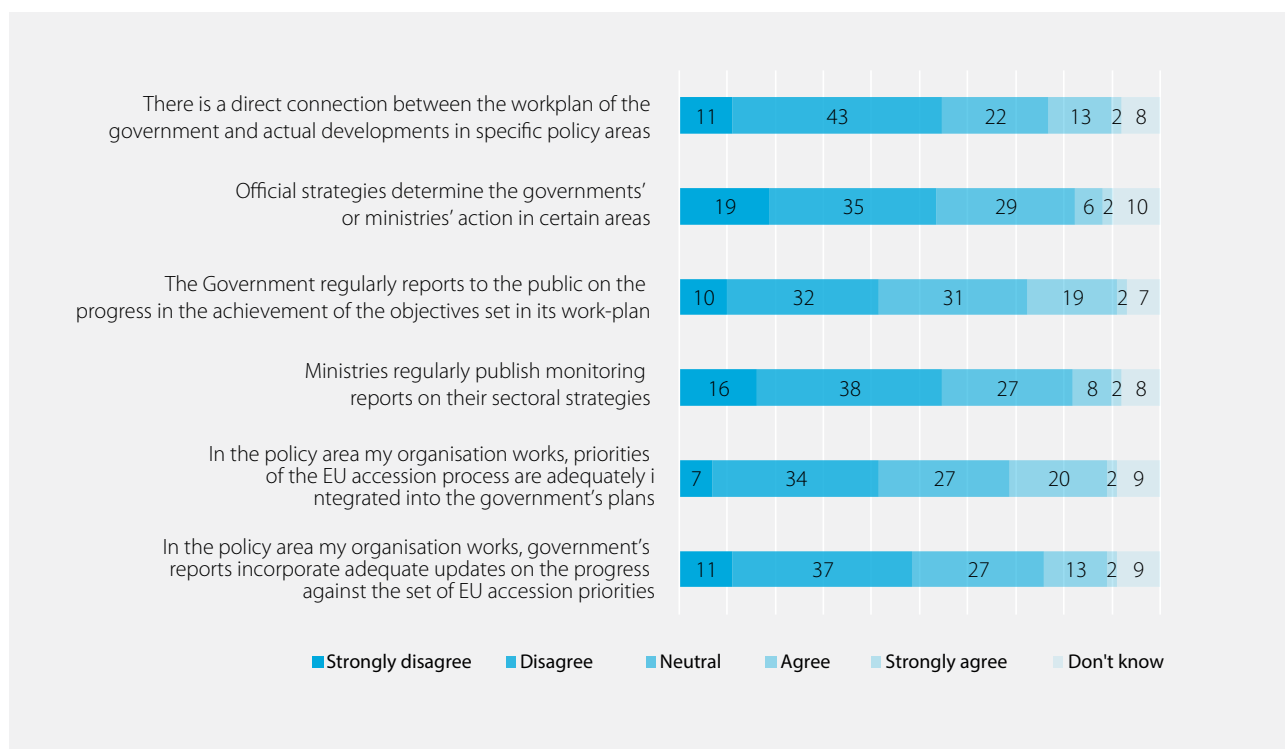
The CSOs perception of the Government's efforts to achieve the planned goals did not change in this monitoring cycle and it remains dominantly negative, as in the previous two cycles. More than half of the surveyed CSOs disagree that there is a direct connection between the Government's planning documents and what is implemented in various policy areas, while only 18% see a direct connection. Compared to the previous cycle, only a slightly higher percentage of CSOs, 21%, agreed that the adopted strategies determine the Government's or ministries' activities in certain areas. However, a significantly smaller share of respondents (8%) confirmed that the Government regularly reports to the public on progress in achieving the set goals, while as many as 54% believe this is not the case. The perception is equally negative regarding reporting practices of ministries

⁸³ Conversion of points : 0–3 points =0; 4–5 points =1; 6–7 points =2; 8–10 points =3; 11–13 points =4; 14–16 points =5.

on the implementation of sectoral strategies - only 10% agree reporting is regular, and 54% disagree. In other words, CSOs in Serbia continuously express a highly critical attitude on the relevance of planning and strategic documents in general, as well as the public availability of the results of their implementation.

In response to questions related to the inclusion of priorities from the EU accession process in the Government's plans and reports, civil society representatives were also highly critical. Namely, only 22% of respondents believe that the priorities of European integration process are adequately integrated into the Government's planning documents, while almost twice as many (41%) have the opposite opinion. The perception is even more negative of whether the Government's reports include information on progress in accordance with such priorities. Only 15% of respondents recognise that reports contain this information, while almost half of respondents (48%) disagree. It is noteworthy that as many as 27% of surveyed CSOs remained neutral in answering both questions, while 9% did not have an answer. A large share of neutral answers to all questions under this indicator (22-31%) suggests that there is no high interest or activity within civil society in monitoring the Government's planning or whether it achieves the planned goals.

Chart 4: Civil society perception on planning and reporting by the Government and ministries (%)

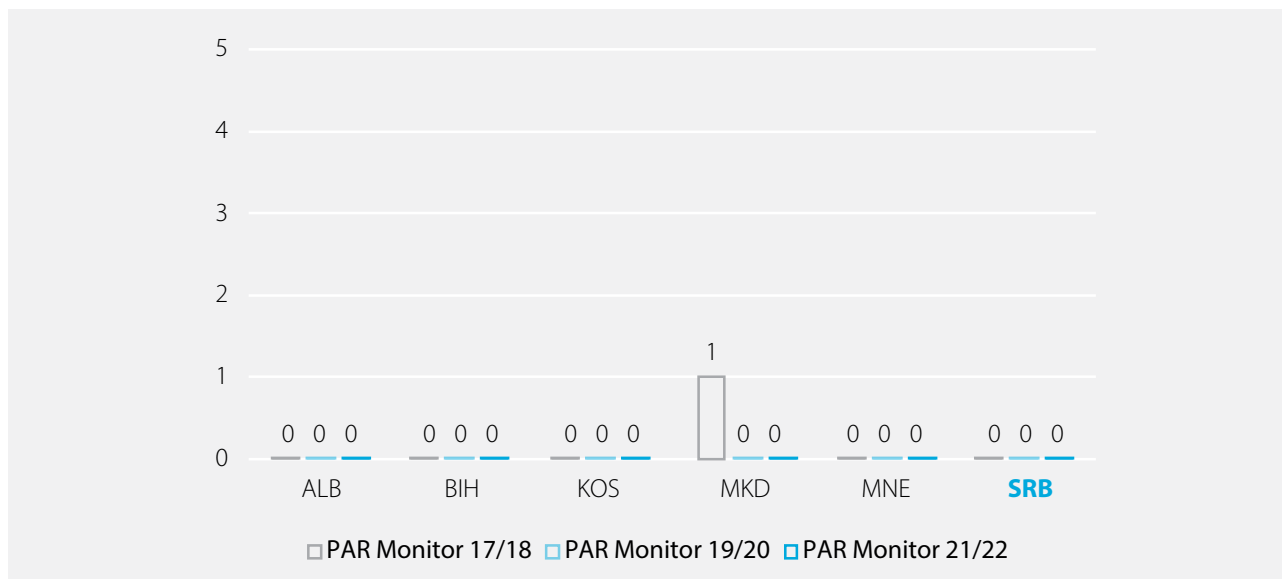


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, n=123.

Overall, a strongly negative perception of civil society on various aspects of governmental planning and reporting repeats in all three monitoring cycles. Most of the surveyed CSOs do not think that the Government's plans and strategies, as well as sectoral strategies, reflect the actual events in policy areas. Also, most respondents stated that neither the Government nor the ministries regularly publish reports that monitor progress in the implementation of plans and strategies. The perception is somewhat less negative when the Government's planning and reporting are linked to the process of European integration. Nevertheless, over 40% of respondents do not believe that the priorities of the EU accession process are adequately integrated into the planning documents, and almost half believe that reporting covers information on the progress in achieving these priorities.

■ How does Serbia do in regional terms?

Chart 5: Civil society perception of the Government's pursuit and achievement of its planned objectives



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Principle 6: Government decisions are prepared in a transparent manner and based on the administrations' professional judgement; legal conformity of the decisions is ensured;

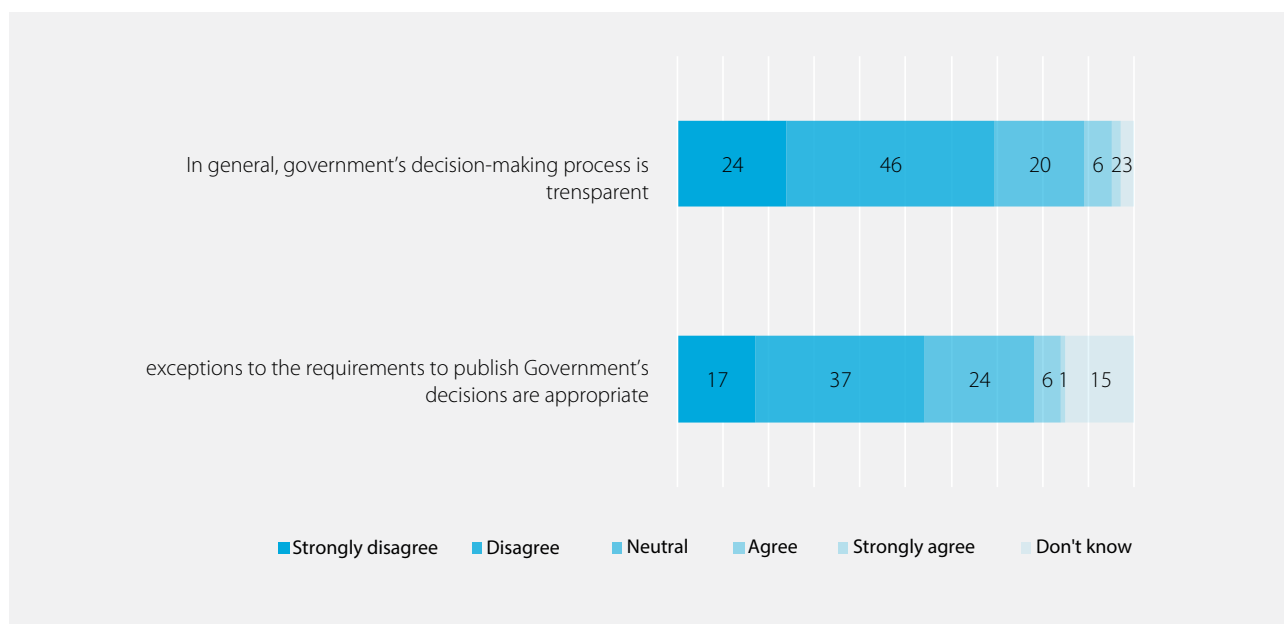
Table 5: Transparency of Government's decision-making

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. CSOs consider government decision-making to be generally transparent	0/2	0/2	0/2
E2. CSOs consider the exceptions to the rules of publishing Government's decisions to be appropriate	0/2	0/2	0/2
E3. The Government makes publicly available the documents from its sessions	0/4	0/4	0/4
E4. The Government communicates its decisions in a citizen-friendly manner	2/4	2/4	2/4
E5. The Government publishes adopted documents in a timely manner	2/4	2/4	2/4
Total score	4/16	4/16	4/16
Indicator value (scale 0-5)⁸⁴	1	1	1

The Government's decision-making is still non-transparent, corresponding to the perception of CSOs of this process, which remains highly negative from one cycle to another. Civil society's perception is even more critical compared to the previous cycles. Only 8% of the respondents believe that, generally speaking, the Government's decision-making is transparent, while as much as 70% disagree. Also, only 7% of them see exceptions to the rule of publication of the Government's decisions as appropriate, while 54% believe the opposite. It is also interesting that almost 40% of respondents chose the "don't know" option or were neutral on the issue of such exceptions. Similar to the case of the Government's planning and reporting activities, this can indicate still insufficient knowledge, or even indifference, within civil society in Serbia towards the official decision-making mechanisms.

⁸⁴ 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 6: CSOs' perception of the transparency of Government's work



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, n=150.

The transparency of decision-making was also evaluated by checking the regularity of publication of materials from the Government's sessions, from August 1st, 2021, to February 1st, 2022, i.e., agenda, meeting minutes, adopted acts, and press releases. Out of 41 observed sessions in this period, as many as nine of them were held in complete secrecy, without any publicly available record of the dates or proceedings from these sessions. The conclusion that these sessions actually took place was based on the numbering of transparently presented sessions at the official website of the Government. For example, after the 71st session held on August 5th, 2021, for which a press release and adopted acts were published, the next on the list is the 74th session, held on August 26th. This led to the conclusion that at least two more were held in the meantime, however without publicly available information.

As in the previous two cycles, agenda and minutes are not available for any session of the Government, representing a chronic lack of decision-making transparency. On the other hand, apart from the mentioned nine sessions for which the public was deprived of any information, at least some adopted acts were published online for the remaining ones. However, without meeting minutes, it is still impossible to fully determine whether all decisions adopted by the Government at any given sessions were made public. In some cases, press releases indicate that the Government has adopted an act, which cannot be easily found on the Government's website or in the Official Gazette. As in the previous period, this mostly refers to the Government's conclusions, for which the Law on the Government did not foresee an explicit obligation to be published. Still, it leaves the possibility for their publication to be regulated by law or other regulation, as well as for the Government to decide *ad hoc* on their publication.⁸⁵ Since the Government's conclusions, among other things, are used by the Government to approve its intentions related to public spending and borrowing,⁸⁶ the non-publication of these legal acts means not only a lack of transparency of the Government's decision-making but also no possibility for public oversight over the spending of public funds.

Finally, press releases are generally published regularly. Out of 32 transparently listed sessions online, a press release was published for 28, informing the public in a largely citizen friendly manner on the most important

⁸⁵ Law on Government, Article 46, Official Gazette of RS, no. 55/2005, 71/2005 - corrected, 101/2007, 65/2008, 16/2011, 68/2012 - CC decision, 72/2012, 7/2014 - CC decision, 44/2014 and 30/2018 – other the law.

⁸⁶ Sava Mitrovic and Milena Lazarevic, Transparency across public administration reform in Serbia: An Underachieved Priority, WeBER 2.0 Brief, Think for Europe Network, July 2022, Available at: <https://cep.org.rs/publikacije/transparentnost-reforme-javne-administrations-in-serbia/> (Accessed 1 July, 2023).

information and the decisions made. Also, press releases can be easily accessed from the website's homepage, supporting the conclusion that informing citizens about adopted decisions through using press releases is done in a accessible way. However, since a considerable number of sessions were held completely away from the public eye, as well as that on several occasions, the Government failed to publish a press release afterwards, the criterion of citizen-friendly communication of government decisions is assessed as partially met.

Table 6: Availability of materials from Government meetings in the period from August 1st, 2021 to February 1st, 2022

Session	Date	Agenda	Minutes	Documents	Press releases
71	August 5, 2021	x	x	✓	✓
72	There is no information	There is no information	There is no information	There is no information	There is no information
73	There is no information	There is no information	There is no information	There is no information	There is no information
74	August 26, 2021	x	x	✓	✓
75	There is no information	There is no information	There is no information	There is no information	There is no information
76	September 2, 2021	x	x	✓	✓
77	There is no information	There is no information	There is no information	There is no information	There is no information
78	September 9, 2021	x	x	✓	✓
79	There is no information	There is no information	There is no information	There is no information	There is no information
80	September 16, 2021	x	x	✓	✓
81	There is no information	There is no information	There is no information	There is no information	There is no information
82	There is no information	There is no information	There is no information	There is no information	There is no information
83	September 30, 2021	x	x	✓	✓
84	October 7, 2021	x	x	✓	✓
85	October 14, 2021	x	x	✓	✓
86	October 21, 2021	x	x	✓	✓
87	October 27, 2021	x	x	✓	✓
88	November 3, 2021	x	x	✓	✓
89	November 8, 2021	x	x	✓	✓
90	November 9, 2021.	x	x	✓	✓
91	November 10, 2021	x	x	✓	✓
92	November 15, 2021	x	x	✓	x
93	November 18, 2021	x	x	✓	✓
94	November 25, 2021	x	x	✓	✓
95	November 30, 2021	x	x	✓	✓
96	December 2, 2021	x	x	✓	✓
97	There is no information	There is no information	There is no information	There is no information	There is no information
98	December 8, 2021	x	x	✓	✓
99	December 9, 2021	x	x	✓	✓

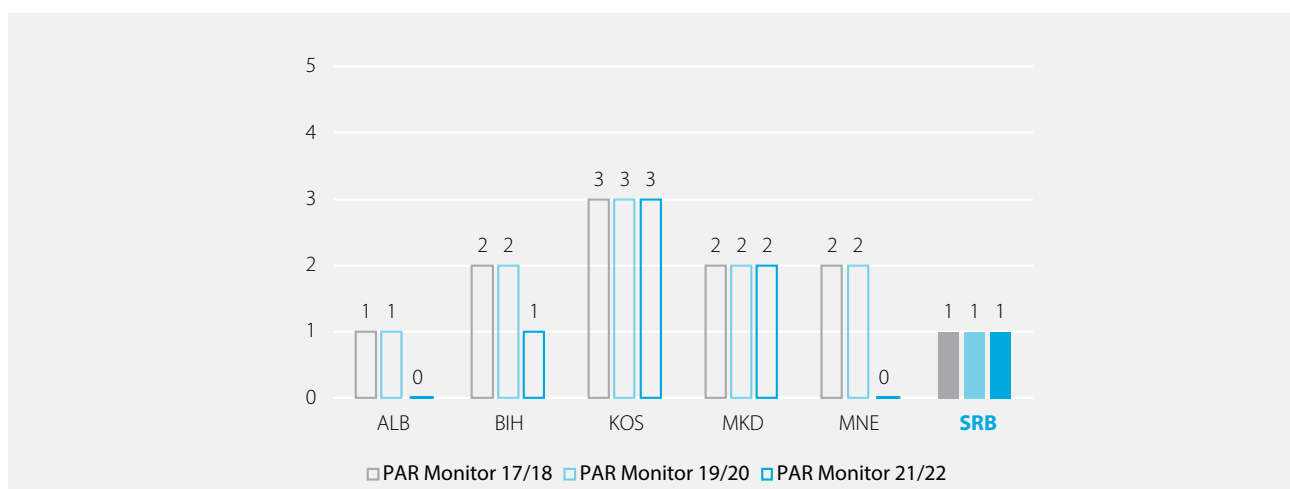
100	December 13, 2021	x	x	✓	✓
101	December 16, 2021	x	x	x	x
102	There is no information	There is no information	There is no information	There is no information	There is no information
103	December 23, 2021	x	x	✓	✓
104	December 27, 2021	x	x	✓	x
105	December 29, 2021	x	x	✓	✓
106	January 10, 2022	x	x	✓	✓
107	January 13, 2022	x	x	✓	✓
108	January 17, 2022	x	x	✓	✓
109	January 20, 2022	x	x	✓	x
110	January 26, 2022	x	x	✓	x
111	January 28, 2022	x	x	✓	✓
In total	41	0	0	32	28

Finally, the up-to-date publication of materials from Government sessions remains partial, as in previous monitoring cycles. 21 sessions were held from February 1st until May 1st, 2022, and the Government published either a press release or at least one of the adopted acts for 19 of them, soon after the session. On the other hand, the phenomenon of sessions with no publicly available records was present in this period as well, together with the practice of not publishing agenda and minutes. In this sense, the importance of the timely publication of materials is diminished due to the general non-transparency of the decision-making process.

Compared to the previous two cycles, the indicator's value remained unchanged. Civil society persists in the extremely negative perception of the Government's decision-making. No progress has been recorded with regard to publishing materials from Government's sessions, and it is still impossible to access publicly available agendas and minutes from any held session. The Government published the adopted acts after most of them, although not all, while press releases are published regularly for the most part and in a timely manner.

■ How does Serbia do in regional terms?

Chart 7: Transparency of Government's decision-making



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

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

Table 7: Use of evidence created by think tanks, independent institutes and other CSOs in policy development

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. Frequency of referencing of evidence-based findings produced by CSOs in the adopted government policy documents	4/4	4/4	4/4
E2. Frequency of referencing of evidence-based findings produced by CSOs in policy papers and ex ante impact assessments	2/4	2/4	2/4
E3. Share of evidence-based findings produced by wide range of CSOs referenced in ex post policy analyses and assessments of government institutions	0/2	2/2	0/2
E4. Relevant ministries or other government institutions invite or commission a wide range of CSOs, to prepare policy studies, papers or impact assessments for specific policy problems or proposals	1/2	0/2	1/2
E5. Representatives of relevant ministries participate in policy dialogue pertaining to specific policy research products	1/2	1/2	0/2
E6. Representatives of wide range of CSOs 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	0/4	0/4	0/4
E7. Relevant ministries in general provide feedback on the evidence-based proposals and recommendations of the wide range of CSOs which have been accepted or rejected, justifying either action	0/2	0/2	0/2
E8. Ministries accept CSOs' policy proposals in the work of working groups for developing policies and legislation	0/4	0/4	0/4
Total score	8/24	9/24	7/24
Indicator value (scale 0-5)⁸⁷	1	2	1

When it comes to the use of evidence-based findings of civil society in policy developing, the third monitoring cycle brought the same results as the previous two.⁸⁸ In the three public policy areas in which civil society organisations are most active (anti-discrimination policy, environmental policy, and culture and media policy), two-thirds of adopted public policy documents use studies and analysis produced by CSOs as a source (14 of 21 analysed documents, see Table 8).

It should be noted that due to the multi-year period of their validity, the largest number of policy documents were analysed in the previous PAR Monitor, and these findings were taken over in this monitoring cycle. In this cycle, the sample included six new policy documents, and four contained references to CSO's work. Thus, the share of adopted policy documents that contain references to CSO findings is at the same level when the calculation is made for all policy documents in the sample, and for the newly adopted ones - 67%. Also, it is important to emphasise that far more frequent references to studies and analyses of civil society have been observed in the newly adopted policy documents. For example, in the Strategy for Prevention and Protection Against Discrimination, the findings of CSOs are cited in as many as 84 places, while in the new Gender Equality Strategy, there are 60 references. These two important strategic documents, prepared consulting a large number of findings resulting from civil society research, are an indicator of good practice that should serve as guidelines for the preparation of other policy documents in the future.

⁸⁷ 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.

⁸⁸ The analysed documents include strategies, plans, programmes or other documents that are formally adopted, which are implemented at the time of monitoring, and which may provide references to external sources and information.

Table 8: Frequency of references to CSOs' findings in public policy documents

Area	Document	Number of references
The fight against discrimination	Strategy for prevention and protection against discrimination for the period from 2022 to 2030 (NEW)	84
	Gender equality strategy for the period from 2021 to 2030 (NEW)	60
	Strategy for social inclusion of Roma in the Republic of Serbia for the period 2022-2030 (NEW)	5
	Strategy for improving the position of persons with disabilities in the Republic of Serbia for the period from 2020 to 2024	14
	Strategy for the prevention and control of HIV infection and AIDS in the Republic of Serbia for the period 2018–2025	12
	Mental health protection programme in the Republic of Serbia for the period 2019–2026	0
Environmental Protection	Water management strategy	1
	Strategy for implementing the Aarhus Convention	1
	National strategy for sustainable use of natural resources and goods	0
	National strategy for approximation in the area of environment for the Republic of Serbia	0
	Status and plans of transposition and implementation of the EU acquis for chapter 27	1
	National programme on environmental protection	0
	National plan to reduce major pollutants from old large combustion plants	0
	Mineral resources management strategy of the Republic of Serbia until 2030	1
	National strategy for incorporation of the Republic of Serbia into clean development mechanism	3
	Programme for the improvement of the management of animal by-products for the period from 2020 to 2024	4
	Waste Management Programme in the Republic of Serbia for the period 2022-2031 (NEW)	0
Strategic framework for communication in the field of environmental protection (NEW)	3	
Culture and information	Strategy for the development of the public communication systems in the Republic of Serbia for the period 2020-2025	26
	Strategy for the development of culture from 2020 to 2029, with the Action Plan for 2020–2022	3
	Strategic priorities for the development of culture in the Republic of Serbia from 2021 to 2025 (NEW)	0

When it comes to *ex-ante* documents that do not go through formal adoption procedures, i.e., regulatory impact assessments, the frequency of references to CSO findings in the same three areas is much lower (6%).⁸⁹ Only 1 out of 16 analysed documents includes references to external sources. A somewhat positive but rare example is the Law on Prohibition of Discrimination, whose regulatory impact assessment consulted and cited in several places the Study on the Application of the Prohibition of Discrimination Law, prepared by the Committee of Lawyers for Human Rights.

Finally, there is a general lack of policy evaluations or any other document of an *ex-post* nature, which makes it difficult to assess whether the findings of CSOs were consulted in the preparation of these documents. To obtain *ex-post* documents, researchers have sent six requests for free access to information of public importance to four different ministries. The Ministry of Environmental Protection is the only one which did not respond to the request. Although other ministries responded, only the Ministry for Human and Minority Rights and Social Dialogue submitted the requested document, i.e., the Evaluation of the Gender Equality Strategy for the period 2016 to 2020. Given that there was no reference to any findings of CSOs, it was assessed that there was

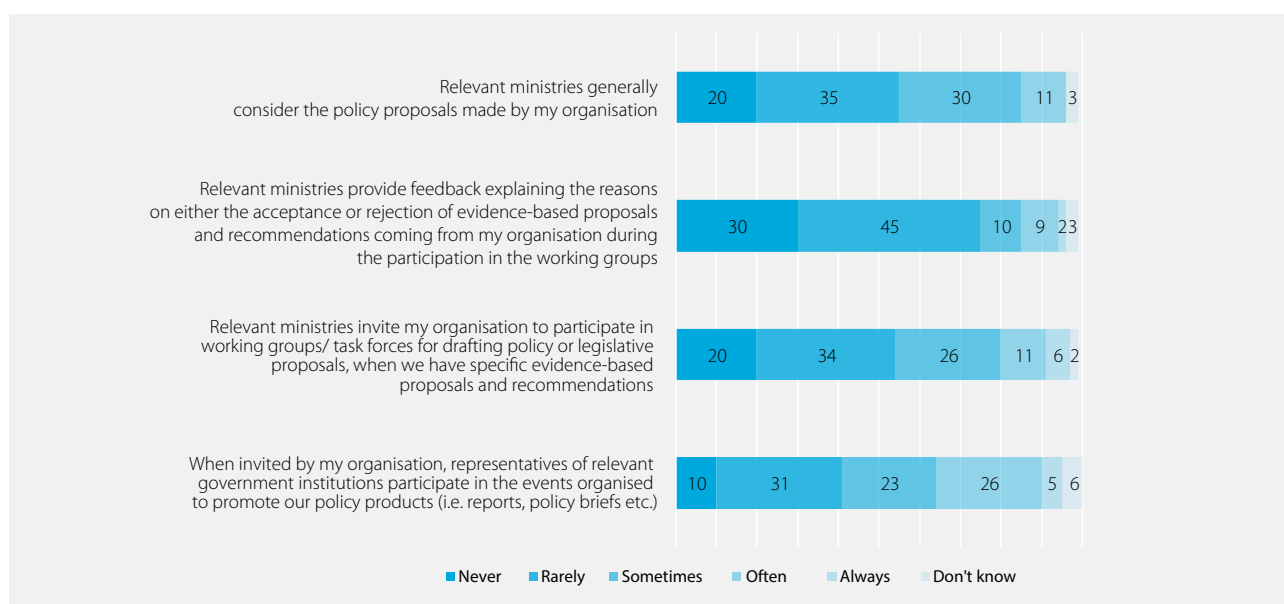
⁸⁹ The analysis includes ex-ante analysis of the effects of regulations, other types of ex-ante impact assessments, public policy concepts and analysis, as well as explanations of laws.

backsliding compared to the previous monitoring cycle, when two-thirds of the analysed ex-post documents included such references.

The remaining elements of this indicator are based on CSOs' perception of the use of findings of the civil sector in policy development. In this regard, almost a third of respondents (31%) confirm that representatives of responsible authorities accept their invitations to participate in events to promote the results of their research and analysis. This represents some, albeit minimal, progress compared to the previous cycle, when less than a quarter of respondents believed this to be the case. On the other hand, around 40% state that this happens rarely or never. The results are also somewhat more positive regarding inviting CSOs to participate in the development of policy papers, studies or impact assessments – compared to 24% in the previous PAR Monitor, 31% of respondents in this cycle confirmed that authorities extend such invitations. However, even in this case, almost 40% of CSO respondents say this rarely or never happens.

When it comes to participation in working groups for policy development, more than half of the surveyed CSOs claim that relevant authorities do not invite them to participate and contribute to their work. These results show a positive shift compared to the previous cycle when over 60% of respondents claimed their organisations were not invited. Also, the number of surveyed CSOs who expressed that they were invited to participate in working groups increased by five percentage points, from a modest 12% in the previous cycle, to 17% in this cycle. Additionally, more than half of the respondents (56%) claim that the ministries rarely or never consider their proposals from the working groups. Finally, the majority of respondents in this cycle (75%) also claim that they rarely or never receive an explanation for the acceptance or rejection of their proposals when they contribute to the work of working groups (2 percentage points more than in the previous, and 7 more than in the initial PAR Monitor 2017/2018).

Chart 8: CSOs' perception of the use of evidence-based findings of think tank organisations, independent institutes and other organisations when developing public policies (%)

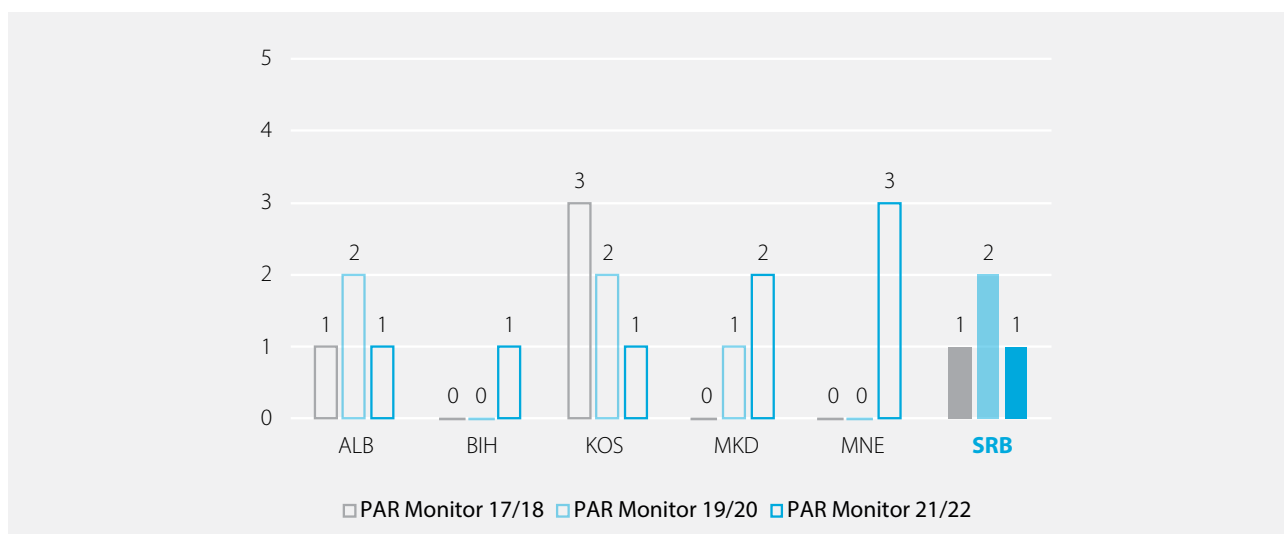


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, n=88.

The results in this monitoring cycle are similar to those of the previous and baseline reports. There is a relatively high frequency of using CSO findings in policy documents, a less frequent use of these findings in *ex-ante* impact assessments of regulations and the absence of references to civil society findings in *ex-post* documents. Regarding the perception of civil society, CSOs believe that responsible ministries more often invite them to prepare studies or analysis for policy proposals. On the other hand, CSOs still feel that they are insufficiently involved in working groups for drafting policy documents and legal proposals, and even when they think they are, the prevailing perception is that they rarely receive feedback, and often fail to influence the outcome of policy development.

■ How does Serbia do in regional terms?

Chart 9: Use of evidence created by think tanks, independent institutes and other CSOs in policy development



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Principle 11: Policies and legislation are designed in an inclusive manner that enables the active participation of society

*Table 9: Inclusiveness and openness of the policymaking**

Indicator elements	Scores 2021 /2022	Scores 2019/2020	Scores 2017/2018
E1. Scope of public consultations on policy documents in central administration	2/4	2/4	n/a
E2. Scope of public consultations on legislation in central administration	2/4	0/4	n/a
E3. Availability of reporting on public consultations on policy documents by central administration	2/4	2/4	n/a
E4. Availability of reporting on public consultations on legislation by central administration	2/4	2/4	n/a
E5. Basic functionality of a national public consultation portal	4/4	0/4	n/a
E6. Advanced functionality of a national public consultation portal	1/2	0/2	n/a
E7. Proactiveness of informing on public consultations	0/4	0/4	n/a
E8. Embeddedness of early public consultations in practice	0/4	0/2	n/a
E9. Quality of reporting on public consultations	1/2	0/2	n/a
E10. Impact of public consultation results on policy making	1/2	0/2	n/a
E11. CSOs consider formal consultation procedures create preconditions for effective inclusion of the public in the policy-making process	0/2	0/2	0/4
E12. CSOs consider formal consultation procedures are applied consistently	0/2	0/2	0/4

E13. CSOs consider that they are consulted at the early phases of the policy process	0/2	0/2	0/4
E14. CSOs consider consultees are timely provided with information on the content of legislative or policy proposals	0/2	0/2	0/2
E15. CSOs consider consultees are provided with adequate information on the content of legislative or policy proposals	0/2	0/2	0/2
E16. CSOs consider sponsoring ministries take actions to ensure that diversity of interests is represented in the consultation processes	0/2	0/2	0/2
E17. CSOs consider ministries (sponsors of policy and legislative proposals) provide written feedback on consultees' inputs/comments	0/2	0/2	0/4
E18. CSOs consider ministries accept consultees' inputs/comments	0/2	0/2	0/4
E19. CSOs consider ministries hold constructive discussions on how the consultees' views have shaped and influenced policy and final decision of government	0/2	0/2	0/2
Total score	15/50	6/50	0/30
Indicator value (scale 0–5)⁹⁰	1	0	0

***Note:** values for the first and the following two monitoring cycles are not directly comparable due to the change in the monitoring methodology.

The results of this monitoring cycle show that the inclusiveness of the policymaking process has increased compared to the PAR Monitor 2019/2020. For this indicator, the inclusiveness of policy making is assessed through analysing the practice of responsible authorities of conducting consultations, or public debates when developing policy documents and regulations.

In this cycle, the monitoring covered consultation practices for policy documents and law proposals adopted by the Government in the second half of 2021. A sample of 15 strategies, action plans and programmes were analysed as policy documents. Public debates were held for 11 (Table 10), and in the case of the Gender Equality Strategy, stakeholder consultations were held as well during the development process. Additionally, for 9 out of 11 documents, reports on public debates are available, and in the case of the aforementioned Strategy, a separate report on the consultation process.

Table 10: Conducted public debates for public policy documents and availability of reports

Documents	Public debate	Availability of reports on public debate
Programme for the reform of the local self-government system 2021–2025	✓	✓
Strategy against the proliferation of weapons of mass destruction 2021–2025	x	
Action plan for the implementation of the Water Management Strategy 2021–2023	✓	✓
Strategy for the development of information society and information security 2021–2026	✓	✓
Action plan for the implementation of the Strategy for economic migration 2021–2023	✓	✓
Operational plan for prevention of corruption in areas of special risk	x	
National war crimes prosecution strategy 2021–2026	✓	✓
Capital market development strategy 2021–2026	✓	✓

90 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.

Strategic for fighting against fraud and irregularity management of European Union funds 2021–2023	✓	x
Revised fiscal strategy for 2022 with projections for 2023 and 2024	x	
Programme for the improvement of public policy management and regulatory reform with an Action plan 2021-2025	✓	✓
Strategy for the development of startup ecosystem 2021–2025 ⁹¹	✓	✓
Strategy of human resources in the judiciary 2022 - 2026	✓	x

Regarding the inclusiveness of the process of developing legal acts, the results also indicate some improvement. An analysis of the drafting process for 59 draft laws, which the Government adopted in the second half of 2021,⁹² revealed that consultations with stakeholders or public debates were held for 33 of them, i.e., approximately for 56%. This is an improvement compared to the 2019/ 2020 cycle, when consultations or public debates were held for 35% acts. On the other hand, in this cycle, reports on held consultations or public debates are available for 25 out of 33 acts.

Additionally, progress has been noted when it comes to the functionalities of the public consultations portal, mostly due to the new eConsultation portal, that became operational during the monitoring cycle. The new portal fulfilled the basic criteria defined by the methodology, allowing users to search through the archive of consultations and public debates for several years back, to search by key parameters (year, type of document, etc.), and make available reports on completed consultations and public debates.⁹³ Progress was also noted regarding the more advanced functions of the portal. In this cycle, four out of five methodological criteria were met: registered users can receive notifications about upcoming consultation processes; they can enter comments directly into the text of a proposed act, available on the portal; responses of responsible authorities to the submitted comments are publicly visible, and it is also possible to see comments submitted by other users, in the text of the document, and in the comment section.⁹⁴

On the other hand, authorities still do not proactively provide information on the beginning of consultation processes, as they do not use all channels available to disseminate information.⁹⁵ Out of 12 active consultation processes during the monitoring, four channels were used only for the draft laws on environmental impact assessment, strategic environmental impact assessment, and audiovisual and film heritage. Notice on the beginning of the development of the National Program for Agriculture for 2022-2024 was disseminated through three different channels, while two channels of information were used for nine consultation processes. Finally, the Proposal of the Strategy for the Development of the System for the Execution of Criminal Sanctions for the Period 2022-2027 was available only on the website of the Ministry of Justice.⁹⁶

Similarly, the practice of organising consultations in the early stages of development has remained the same as before. Out of 45 policy documents and draft laws, for which some type of consultation was carried out in the monitoring period,⁹⁷ the process only started at an early stage for a third of them (for nine public policy documents, and six draft laws).⁹⁸ This indicates that the consultations in the initial stages of development, during

91 The Action plan for the period until December 31, 2022 for the implementation of the Strategy was adopted only a few days after the adoption of the strategy, in December 2021. Given that it was adopted separately, the Action Plan was also taken into account in the sample of documents for the assessment of this element.

92 The sample of analysed acts did not include laws related to the ratification of international agreements.

93 Since the number of public consultations conducted on the new portal was insufficient to evaluate the last criterion observed within this element, the regularity of publishing reports on public debates and consultations on the old portal was taken into account.

94 See at: <http://bitly.ws/GF4b> (accessed 2 June 2023). The only criterion that the portal did not meet during the monitoring period was the comprehensiveness of the documentation available for each consultation process.

95 For all ongoing public consultations in the measurement period, it was monitored whether the following means of information were used: 1. the website of the authority conducting the consultation; 2. websites of relevant Government offices (for example, for cooperation with civil society); 3. social media of government institutions; 4. e-consultation portals; and 5. media. Given that the Office for Cooperation with Civil Society ceased to exist in the meantime and that its competences were transferred to the Ministry for Human and Minority Rights and Social Dialogue, it was not possible to fulfill all 5 required criteria.

96 The assessment of the fulfillment of the criteria for evaluating proactiveness in information was carried out in February 2022.

97 Total number of public policy documents and legislative acts, from the sample for elements 1 and 2 within this indicator, for which consultations or public debates were conducted.

98 For the purposes of evaluating this element, the membership of CSOs in working groups for the drafting of public policy documents and laws was taken into account as inclusion in the early stage of the process.

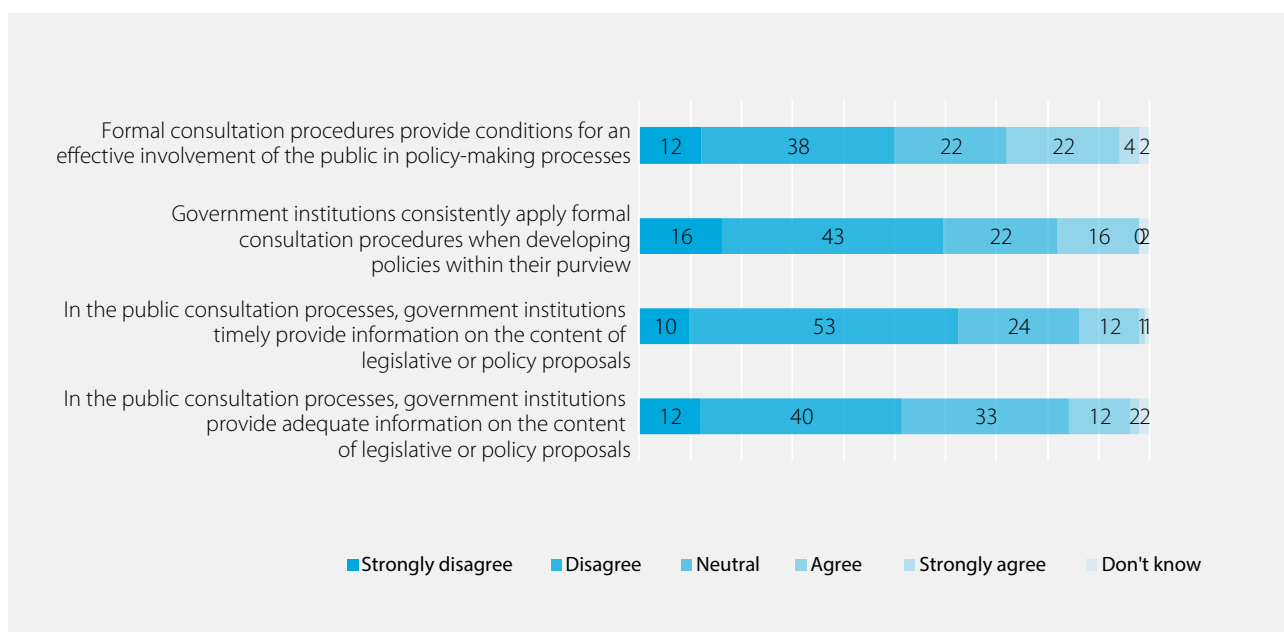
which the impact assessments on society as a whole or individual societal groups are carried out, are still not sufficiently recognised as an indispensable part of the entire policy development process.

Nevertheless, slight progress was noted in the quality of reports on conducted consultations and public debates. Out of a total of 35 observed reports, 12 met all three quality criteria, while six of them met two.⁹⁹ These findings suggest that there is still no uniform, standardised approach toward the production of these reports, despite a slight improvement compared to the previous monitoring period. This is primarily reflected in the lack of feedback on received comments. The public often lacks insight into whether comments were adopted, the reasons for non-adoption, or if they were even considered at all by the relevant authorities.

Additionally, a positive shift was noted in terms of the impact of consultative processes on policymaking, measured by the percentage of rejected comments submitted by interested parties. Although still high, the percentage of rejected comments is lower in this cycle (62%) than in the previous one (78%). Despite such a percentage change, this finding still indicates that the effects of consultative processes remain relatively low.

When it comes to the perception of CSOs on the inclusiveness and openness of policymaking, there was no improvement compared to the PAR Monitor 2019/2020, and the perception on certain issues is even more unfavourable than before. For example, half of the respondents disagree that formal procedures for consultations and public debates provide conditions for effective public participation in the policymaking process, similar to the previous monitoring cycle (48%). On the other hand, the share of those who disagree that relevant authorities consistently conduct consultations and public debates during the development of policy documents and legal acts has increased to 60% of respondents (51% in the previous cycle). Additionally, a larger share of respondents disagreed with the statement that relevant authorities provide timely information on the content of draft legal acts or policy documents (63%, compared to 50% in the previous cycle), as well as with the statement that institutions provide adequate information on the content of these drafts (50%, compared to 41% in the previous cycle). In other words, although this monitoring cycle shows that the practice of organising consultative processes has been somewhat improved, a significant percentage of civil society still believes that the implementation of regulations is insufficient and that authorities are inefficient in informing the public.

Chart 10a: CSO perception on consultations organised during the policymaking process (%)



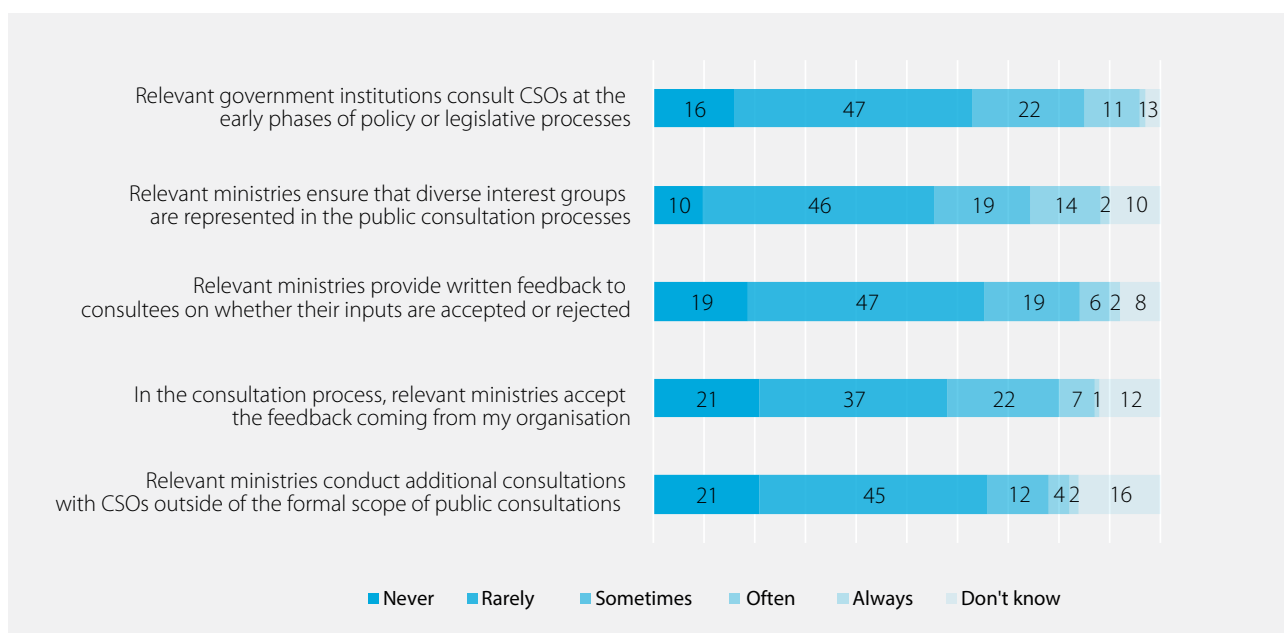
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, n = 129.

⁹⁹ The criteria refer to whether the reports include all comments and suggestions received during the consultation process, whether the report includes information on the treatment of comments and suggestions, and whether the explanations for rejection, i.e., partial acceptance and rejection of comments and suggestions are provided.

The second group of questions focused on the frequency of certain practices regarding consultations and public debates. In this case, no progress was recorded either. Approximately 12% of CSOs believe that relevant authorities always or often consult them in the early stages of developing legislation or policy documents. In comparison, 63% of respondents believe this happens rarely or never. CSOs perceptions are also extremely negative regarding the inclusion of various interest groups in the consultative processes carried out by the relevant ministries. As many as 56% of respondents believe that ministries rarely or never ensure that various interests are represented, while 15.5% believe this happens always or often. Additionally, the majority of CSOs point out that they had no insight into how their comments and suggestions, submitted during the consultation processes, were treated by the ministries - as many as 65% of respondents believe that the ministries rarely or never submit written explanations on the reasons for accepting or rejecting their comments. Similarly, 58% of CSOs who had the opportunity to submit their comments during a consultative process, say that relevant institutions rarely or never accept them. Overall, the analysis of the conducted consultative processes, and the perception of CSOs, unequivocally point to the weak influence of civil society on public policy development.

Finally, it is worth emphasising that CSOs in Serbia assert that relevant authorities rarely organise additional consultations outside the formal framework. Namely, 66% of respondents believe they rarely or never do this, while only slightly more than 5% believe such additional consultations happen always or often. Such perception indicates that consultative processes have not become more transparent and inclusive, despite the fact that, in practice, there has been a moderate improvement when it comes to the scope of organised public debates and consultations compared to the previous cycle.

Chart 10b: CSO perception on consultation in the policymaking process (%)

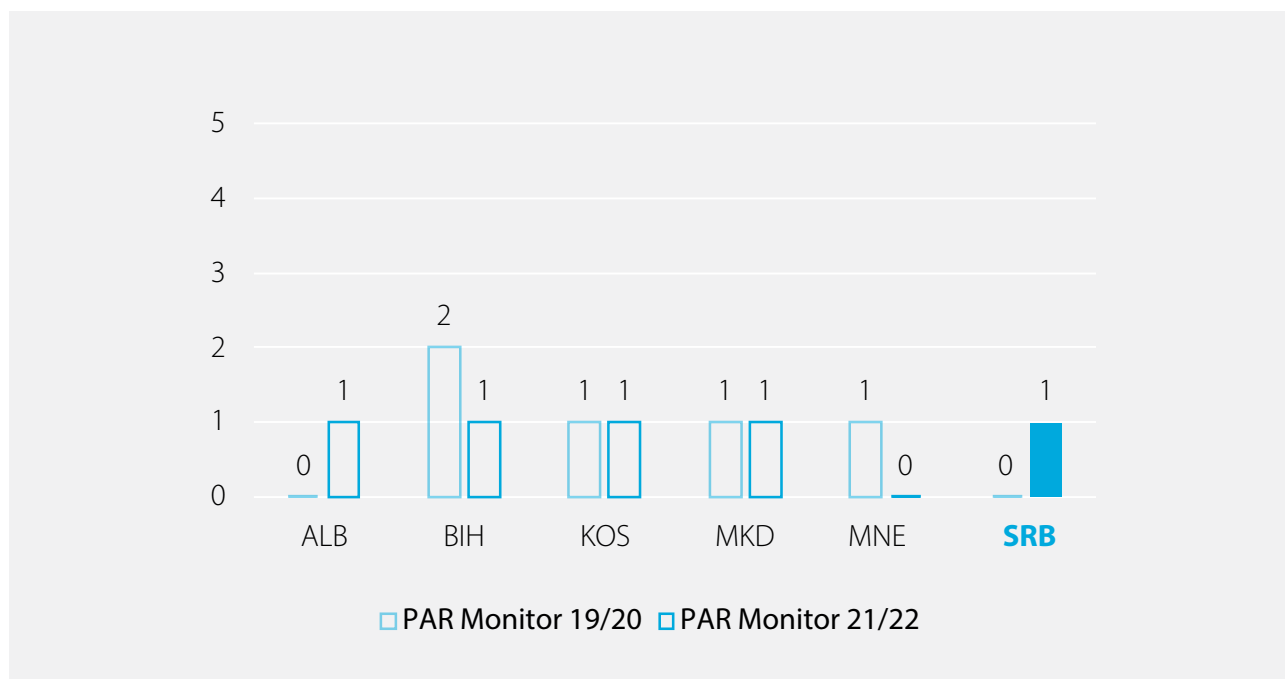
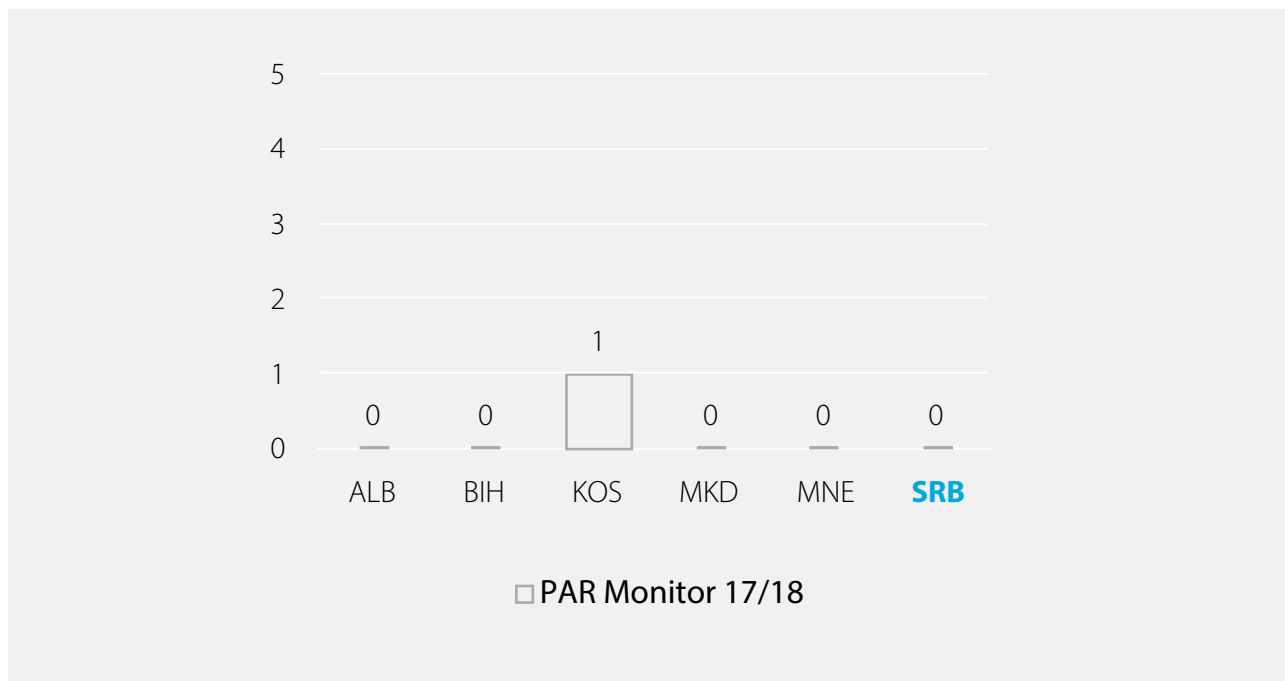


Note: All results are rounded to the nearest whole number. Due to rounding, percentages may not always add up to 100%. Sample N=129.

Overall, slight progress was noted regarding the openness and inclusiveness of the policymaking process, so the indicator value increased to 1. However, the practice of conducting consultations and public debates during policy development is still uneven, just like reporting on the progress and outcomes of these processes. In this cycle, as in the previous ones, the authorities that organised consultations did not proactively inform or involve interested parties in the early stages of consultation processes, while the share of rejected comments on proposals remains extremely high. Accordingly, the survey of CSOs has once again shown that representatives of civil society organisations do not consider consultation practices of policy making authorities as sufficiently inclusive and open.

■ How does Serbia do in regional terms?

Chart 11: Inclusiveness and openness of policymaking



* The values of the first monitoring cycle are not directly comparable with the following two cycles due to a change in methodology.

The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org.

III. 5 Summary of results in the Policy Development and Coordination area

In the area of policy development and coordination, certain, albeit limited, progress was recorded. Progress was achieved mostly due to a higher level of inclusivity and openness of the policymaking process but also due to a slightly increased public availability of information on Government's performance. In other issues, Serbia mostly stagnated or recorded a minimal decline.

Regarding the availability of information on Government's performance, both annual reports of the Government from the sample were publicly available during the monitoring, which was not the case in previous cycles. Nevertheless, the reports still do not meet the criteria for being citizen-friendly, and gender-segregated or open data on the Government's performance is still unavailable. Another problem is that the Government's reports do not represent data on the performance of the Government as a collective body, but rather only a sum of the reports of individual state administration bodies.

Civil society's traditionally negative perception of various aspects of government planning and reporting remained unchanged in this monitoring cycle. Most surveyed CSOs do not recognise the direct connection between the Government's work plans and actual developments in specific policy areas, nor do they believe that adopted strategies determine the Government's or ministries' activities. Further, only 21% of the respondents believe that the Government regularly publishes progress reports, while half as much believe that the ministries do this regularly. The perception is only slightly more favourable regarding integrating priorities from the EU accession process into government plans, and reports.

When it comes to the transparency of the Government's decision-making, the situation remained the same compared to the previous two cycles. A sample of 41 sessions confirmed that the Government still does not publish agenda and meeting minutes and that some adopted acts are not available online. This is also recognised by CSOs, most of whom believe that exemptions from the obligation for publishing Government acts are not appropriate. Although press releases are published regularly and promptly, 70% of CSOs continue to disagree that decision making process is transparent, showing that this was not enough to convince civil society that the Government decides transparently.

The situation is also almost unchanged regarding the use of evidence-based findings of civil society during policy development. While there is a relatively frequent practice of referencing CSO research in policy documents, with a couple of positive examples, there is also a very rare use of civil society findings in ex-ante or ex-post analyses. The perception of civil society in this domain is also low, as a minimal improvement was recorded of CSOs believing that relevant authorities invite them more regularly to participate in working groups for the drafting of regulations or policy documents.

The most pronounced, although certainly limited, change was recorded in terms of the openness and inclusiveness of the policymaking process. A larger share of adopted policy and law proposals were subject to consultations or public debates, a greater number of reports on the conducted consultative processes met the minimum quality standards, and the impact of consultations and public debates on policy development increased to an extent. Additionally, functions of the new eConsultation portal satisfy all the basic and most of the advanced criteria. Nevertheless, the practice of holding consultations and public debates remains very uneven within the administration, there is not enough proactivity in involving stakeholders in the early stages of policy development, and the perception of civil society remains extremely negative.

III.6 Recommendations for Policy Development and Coordination

Tracking recommendations from PAR Monitor 2019/2020

Colour coding scheme for tracking recommendations

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Recommendation	Status	Comment
1. GAWP annual implementation reports should be regularly published at the official Governments' website, or General Secretariats, visible and accessible from the homepages.	Initiated	GAWP annual implementation reports for 2020 and 2021 are available on the Government's website but cannot be accessed from the home page. The report for 2021 is not available on the website of the General Secretariat of the Government. ¹⁰⁰
2. GAWP annual reporting should include citizen-friendly descriptions of achievements by the Government as whole, in addition to or instead of the reporting as per existing GAWP structure.	No action taken	The reports of individual state administration bodies, which are an integral part of the annual reports on Government's work, contain a narrative part summarising their activities, but they are not written in a citizen-friendly manner. The achievements of the Government as a collective body are not available in these reports.
3. GAWP annual reporting should be improved to include visible results achieved in different policy areas in the reporting period including relevant information on horizontal policy dimensions such as but not limited to gender mainstreaming, environment, sustainable development.	No action taken	In the annual reports of the Government, there is practically no data related to gender mainstreaming. They can only be found in a few places in the reports, but they refer to certain state administration bodies. The same applies to the areas of environment and sustainable development, which indicates a lack of information on horizontal policies.
4. The Government should start regularly publishing agenda items and meeting minutes for each session. Whereas it is preferable to publish an agenda in advance of individual session, minutes should be published timely, a week after the session at latest.	No action taken	The agenda and minutes from the Government sessions are still not published. ¹⁰¹
5. Press releases should be published or linked together with other materials, so all the information from individual session can be found and accessed at the single website location.	No action taken	Press releases are not posted in the same location as other materials from sessions.

¹⁰⁰ The reports are available at: <http://bitly.ws/Dumm> (accessed 25 April 2023).

¹⁰¹ Materials from the Government sessions, available at: <http://bitly.ws/Durm> (accessed 25 April 2023).

<p>6. Structure and appearance of information on sessions should be revamped for easier access. Although this information is available via homepage banner, visibility should be improved and the download of documents in zipped format avoided.</p>	<p>No action taken</p>	<p>Materials from the Government's sessions in the current mandate are available from the home page. On the other hand, information on sessions from the previous mandates is archived. Also, session materials are published in zipped format, with no search options.</p>
<p>7. Ministries, and other public authorities organising public consultations (and public debates), should pursue timeliness and proactiveness in announcing them. That is, enough time should be dedicated for preparations of civil society and other interested stakeholders, and all the available channels should be used to announce consultations - including websites of responsible body, eGovernment portal, ministry/body in charge for cooperation with civil society, social media of all the involved institutions, at least.</p>	<p>Partially implemented</p>	<p>Ministries, as a rule, announce consultations on their websites. Some ministries also announce them on the eConsultation portal, but not all of them. The results of this monitoring cycle indicate that two communication channels or fewer were used in 58% of the analysed consultation processes.</p>
<p>8. In this regard, keeping and updating the record of civil society organisations and individuals who previously participated in consultations and public debates should be practiced, ensuring continuity of inviting already engaged and interested organisation and individuals.</p>	<p>No action taken</p>	<p>Review of websites indicated that none of the 25 ministries keeps comprehensive records of CSOs and individuals who participated in public debates or consultations.</p>
<p>9. When organising consultations, inputs and comments from the civil society and the public should be sought as early as possible in the process, and preferably in the policy formulation phase.</p>	<p>Initiated</p>	<p>With the entry into force of the Law on the Planning System, consultations at the beginning of the drafting process became an obligation. The Law on State Administration (Article 77) obliges authorities to announce the start of work and ensure public participation in drafting regulations and other documents. However, this practice is still not applied consistently. During the monitoring cycle, it was established that consultations in the early phase were held only for nine policy documents and six legal acts. In addition, quality control of the consultation process has not been established.¹⁰²</p>
<p>10. Moreover, authorities should without exception inform the participants on consultation proceedings, be it public debate on draft documents or earlier held consultations. In other words, irrespective of types of consultation (online, face-to-face) consultation reports should be published in each case, addressing each input, and providing explanation for acceptance or dismissal, so the entire process is easily traceable from start to finish, transparent, and unambiguous.</p>	<p>Partially implemented</p>	<p>Of the 45 policy documents and legislation acts, for which consultations with stakeholders or public debates were held in this cycle, reports are available for 35. However, only 12 out of 35 reports met all three quality criteria, indicating that reports do not always contain complete information on stakeholder's comments and their treatment.</p>
<p>11. Additional consultation should be considered in each case when consultation process returned unresolved, contested, or especially important issues for civil society and the public. Such practice can increase trust in the process, and quality of adopted solutions eventually.</p>	<p>N/A</p>	<p>There is no publicly available information to assess the implementation.</p>

102 Law on Planning System, available at: <https://bit.ly/3xmkBTB> , Law on State Administration, available at: <https://bit.ly/3AxCNf1> (accessed 25 April 2023).

<p>12. Introduce an obligation to publish the Government's conclusions as a particular type of act that the Government of Serbia uses to endorse numerous and diverse decisions, often with important fiscal, social, or environmental impact. Exceptions from the publication of these acts should strictly follow the regulations on the classification of data secrecy, meaning that they should only be exempt from publication if they are formally classified as confidential.</p>	<p>No action taken</p>	<p>During this monitoring cycle, it was established that the Government's conclusions are often mentioned in press releases but are not publicly available, neither on the Government's website nor in the Official Gazette. Also, the Law on Government does not foresee an explicit obligation to publish them.¹⁰³</p>
<p>13. The relevant government institutions (mostly the General Secretariat of the Government, the Ministry for Human Rights and Social Dialogue – Sector for CSO cooperation, and the Public Policy Secretariat) should organise online and face-to-face meetings and workshops with civil society organisations across Serbia, to disseminate information about opportunities for contributing/participating to the policy and legislative processes at the national level. Particularly in light of the eParticipation portal, which is currently in the launching process, a wide engagement with CSOs would help clarify expectations of the public regarding consultations and public debates as well as raise the interest and number of civil society actors who actively contribute to public consultations.</p>	<p>Partially implemented</p>	<p>The PPS and the Ministry of Human and Minority Rights and Social Dialogue held several workshops and meetings with CSOs during 2022, which aimed to improve cooperation between state institutions and the civil sector. During March and April 2022, the Ministry held two two-day workshops on "Cooperation of state administration bodies with civil society organisations in the decision-making process" with over 40 representatives of CSOs and state administration bodies. Also, in November 2022, the Ministry organised the conference "Dialogue of change: the possibilities and obstacles of cooperation between civil society organisations and public authorities" with over a hundred representatives of public administration, civil society organisations, the EU Delegation and other participants. In December, a two-day training was held for employees of state administration bodies and representatives of civil society organisations on the topic "Partnership in decision making – between good framework and practice". Additionally, in May 2022, the PPS held a two-day training for citizens and CSOs on how to use the eConsultation portal.</p>
<p>14. The Government should introduce a legal obligation for a relevant state administration body to assure the quality of the procedures relating to public participation in the development of both policy documents and legislation.</p>	<p>No action taken</p>	<p>There were no amendments to the Law on the Planning System, nor are there any by-laws that regulate this issue.</p>

103 Law on Government, available at: <http://bitly.ws/Aene> (accessed 25 April 2023).

Recommendations from PAR Monitor 2021/2022

Most of the recommendations from PAR Monitor 2019/2020 are still relevant, and a large number of them has been repeated in this cycle. Certain repeated recommendations were modified for their clarification and concretisation.

Repeated and modified recommendations from PAR Monitor 2019/2020

1. GAWP annual implementation reports should be regularly published at the official Governments', or General Secretariats' website, visible and accessible from the homepages.
2. GAWP annual reporting should include citizen-friendly descriptions of achievements by the Government as whole, in addition to or instead of the reporting as per existing GAWP structure.
3. GAWP annual reporting should be improved to include visible results achieved in different policy areas in the reporting period including relevant information on horizontal policy dimensions such as but not limited to gender mainstreaming, environment, sustainable development.
4. The Government should start regularly publishing agenda items and meeting minutes for each session. Whereas it is preferable to publish an agenda in advance of individual session, minutes should be published timely, a week after the session at latest.
5. Press releases should be published or linked together with other materials, so all the information from individual session can be found and accessed at the single website location.
6. Structure and appearance of information on sessions should be revamped for easier access. Although this information is available via homepage banner, visibility should be improved and the download of documents in zipped format avoided.
7. Ministries, and other public authorities organising public consultations (and public debates), should pursue timeliness and proactiveness in announcing them. That is, enough time should be dedicated for preparations of civil society and other interested stakeholders, and all the available channels should be used to announce consultations - including websites of responsible body, eGovernment portal, ministry/body in charge for cooperation with civil society, social media of all the involved institutions, at least.
8. In this regard, keeping and updating the record of civil society organisations and individuals who previously participated in consultations and public debates should be practiced, ensuring continuity of inviting already engaged and interested organisation and individuals.
9. When organising consultations, inputs and comments from the civil society and the public should be sought as early as possible in the process, and preferably in the policy formulation phase.
10. Moreover, authorities should without exception inform the participants on consultation proceedings, be it public debate on draft documents or earlier held consultations. In other words, irrespective of types of consultation (online, face-to-face) consultation reports should be published in each case, addressing each input, and providing explanation for acceptance or dismissal, so the entire process is easily traceable from start to finish, transparent, and unambiguous.
11. Introduce an obligation to publish the Government's conclusions as a particular type of act that the Government of Serbia uses to endorse numerous and diverse decisions, often with important fiscal, social, or environmental impact. Exceptions from the publication of these acts should strictly follow the regulations on the classification of data secrecy, meaning that they should only be exempt from publication if they are formally classified as confidential.
12. The relevant government institutions (mostly the General Secretariat of the Government, the Ministry for Human Rights and Social Dialogue – Sector for CSO cooperation, and the Public Policy Secretariat) should organise online and face-to-face meetings and workshops with civil society organisations across Serbia, to disseminate information about opportunities for contributing/participating to the policy and legislative processes at the national level. Particularly in light of the eConsultation portal, which is currently in the launching process, a wide engagement with CSOs would help clarify expectations of the public regarding consultations and public debates as well as raise the interest and number of civil society actors who actively contribute to public consultations.
13. The Government should introduce a legal obligation for a relevant state administration body to assure the quality of the procedures relating to public participation in the development of both policy documents and legislation.

IV.

PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT



IV.1 WeBER indicators used in Public Service and Human Resource Management and country values for Serbia

PSHRM_P2_I1: Public availability of statistics and reports about the civil service and employees in central state administration



PSHRM_P2_I2: Performance of tasks characteristic for civil service outside of the civil service merit-based regime



PSHRM_P3_I1: Openness, transparency, and fairness of recruitment into the civil service



PSHRM_P4_I1: Effective protection of senior civil servants' position from unwanted political interference



PSHRM_P5_I1: Transparency, clarity, and public availability of information on the civil service remuneration system



PSHRM_P7_I1: Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service



IV.2 State of play in Public Service and Human Resource Management and main developments since 2020

Civil service information system

The development of the information system for HRM is still ongoing. The new civil service database was originally planned to become operational in the first half of 2021, but in the Action Plan of the PAR Strategy, the development of the information system has been postponed from the second quarter of 2021 to the end of 2025.¹⁰⁴ The delay is mentioned both in the reports of the European Commission for 2021 and 2022, as well as in the Annual Report for 2021 on the implementation of the PAR Strategy, which states that the system has not been fully operational because failures in functioning were observed during software testing. The new information system is still in the testing phase.¹⁰⁵

Temporary employment in the civil service

The implementation of the adopted amendments to the Law on Civil Servants, which regulate fixed-term employment, i.e., prescribe the obligation to conduct a competition procedure for temporary employment in case of increased workload, was initially postponed to 2021, but was then put on hold until 2023.¹⁰⁶ With the latest amendments to the Law from December 2022, the implementation of these amendments has been postponed yet again, this time until 2025, meaning that the competition procedures for hiring fixed-term employees are still not carried out. This issue is especially important considering that the policy of controlled employment has been in force since 2019 and that a significant number of persons are employed based on

¹⁰⁴ Action plan for the period from 2021 to 2025 for the implementation of the PAR Strategy for 2021 to 2030, page 12. Available at: <http://bitly.ws/AeUD> (accessed 15 March 2023)

¹⁰⁵ European Commission, *Serbia 2021 Report*, page 15, available at: <http://bitly.ws/B78d> (accessed 15 March 2023), European Commission, *Serbia 2022 Report*, page 17, available at: <http://bitly.ws/zxzQ> (accessed 15 March 2023) and Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the PAR Strategy for 2021-2030*, page 3, available at: <http://bitly.ws/B77R> (accessed 15 March 2023)

¹⁰⁶ European Commission, *Serbia 2022 Report*, page 16, available at: <http://bitly.ws/zxzQ> (accessed 15 March 2023)

fixed-term contracts without undergoing a selection process.¹⁰⁷

The Budget System Law stipulates that, as of January 1st, 2021, the total number of temporary employees (except interns) cannot exceed 10% of the total number of permanent employees. Exceptionally, this limit can be exceeded on the proposal of an authority with the consent of the Government.¹⁰⁸ However, the data shows that in 2021, over 10% of positions in the civil service were filled “on a temporary basis without competition”, however, criteria such as the retention rate of newly hired civil servants and the efficiency of the recruitment process have improved, according to SIGMA.¹⁰⁹ Since 2020, there has been no improvement regarding the ability to convert certain categories of fixed-term contracts into permanent contracts. The European Commission (EC) continues to highlight this as an issue that should be carefully monitored in order to prevent potential abuses.¹¹⁰

■ Civil service employment and meritocracy

Since the last monitoring cycle, Serbia has fully implemented the competency model in the civil service system, i.e., in the recruitment procedures. Although this can be considered an achievement, there is still room for improvement, considering that, as stated by SIGMA, the degree of fulfilment of the criteria in the competition procedure is very high and further work is needed to assess its adequacy.¹¹¹ The EC states that the legislative framework foresees merit-based employment, but the discretionary power given to heads of institutions in setting up selection committees is seen as a problem that needs to be solved.¹¹² The Annual Report for 2021 on the Implementation of the PAR Strategy shows that an extremely low level of employment based on the stated personnel needs of the administrative bodies was recorded - 14%, while the goal was 20 to 25%.¹¹³ The untimely adoption of the personnel plan of ministries, special organisations, government services, and expert services of administrative districts for 2021 was cited as the reason behind this. On the other hand, in the Report, the normative introduction of the competency model for administrative bodies of the autonomous provinces and local self-government units (LSGUs) is highlighted as one of the achievements, through the adoption of the amendments to the Law on Employees in Autonomous Provinces and Local Self-Government Units.

It should be pointed out that there is still a certain type of restriction on employment in the state administration, even though the regulation on the prohibition of employment in the public sector has not been in force since 2020. Namely, Article 27k of the Budget System Law, which refers to the employment of persons in all budget beneficiaries, prescribes that the institutions can hire new employees in the current calendar year for an indefinite period, or temporarily as trainees, but only up to 70% of the total number of permanent employees whose employment was terminated on any basis in the previous calendar year.¹¹⁴ The Government decides on the admission of persons above that percentage upon the proposal of the relevant authority; however, there are no available criteria based on which the Government makes decisions in these cases.

■ Senior civil service professionalism

According to SIGMA, the Law on Civil Servants enables the merit-based employment of civil servants. Such an assessment stems from the fact that the High Civil Service Council decides on the composition of the competition commissions for senior civil service positions appointed by the Government, which ensures that they are professional.¹¹⁵ On the other hand, the data on the number of appointments of acting senior civil servants show that the employment system established by the law is not applied in practice and that there is a

107 Public administration reform strategy for the period 2021 - 2030, page 112 - 113. Official Gazette no. 42/2021 and 9/2022

108 Article 27k, Budget System Law, Official Gazette no. 54/2009-3, 73/2010-3, 101/2010-239, 101/2011-260, 93/2012-175, 62/2013-3, 63/2013-3 (correction), 108/2013-3, 142/2014-190, 68/2015-22 (other law), 103/2015-151, 99/2016-160, 113/2017-3, 95/2018-223, 31/2019-5, 72/2019-185, 149/2020-278, 118/2021-3, 118/2021-12 (other law), 138/2022-207.

109 SIGMA, *Monitoring Report for Serbia*, 2021, page 65. Available at: <http://bitly.ws/zxEK> (accessed March 16, 2023)

110 European Commission, *Serbia 2021 Report*, page 15.

111 SIGMA, *Monitoring Report for Serbia*, 2021, page 62.

112 European Commission, *Serbia 2021 Report*, page 15 and European Commission, *Serbia 2022 Report*, page 16.

113 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the PAR Strategy for 2021-2030*, page 31.

114 Minus the number of new permanent employees and fixed-term trainees in that calendar year.

115 SIGMA, *Monitoring Report for Serbia*, 2021, page 76.

lack of political will for respecting it, leading to the bypass of competition procedures.¹¹⁶ Although the issue of acting senior civil servants is recognised as a high-priority issue in the PAR Strategy, the European Commission states that this area still causes concern. Data from the European Commission show that, until June 2021, 62% of filled senior positions were held on an acting basis.¹¹⁷ By the middle of 2022, some progress was recorded, but acting senior civil servants still occupied the majority of senior positions (51%).¹¹⁸ Similarly, in the Annual Report for 2021 on the implementation of the PAR Strategy, MPALSG states that 42% of the total number of filled positions were filled after the competition, which exceeded the target value of 40% for 2021 and also showed an increase compared to 2020 (34%).¹¹⁹

■ Remuneration system and integrity of civil service

The Law on the Remuneration System of Public Sector Employees provides the legal framework for the reform of the salary system at both the central and local level, but the start of implementation is constantly postponed, the last time until January 1st, 2025.¹²⁰ The reform envisaged by this law introduces the principle of equal pay for equal work for all employees in the public sector and the constant postponement is one of the reasons why the EC has stated that there was no progress in improving the salary system of civil servants.¹²¹

SIGMA states that the current legal framework lays the foundation for an adequate reward system based on job classification. However, several problems still arise, one of them being that there is no option for bonus payments based on performance, but only the possibility of a permanent salary increase by moving to a higher salary grade based on performance evaluation.¹²² This aspect is particularly important, bearing in mind that the PAR Strategy recognises that salaries of civil servants are not competitive with salaries in the private sector and that improvement is necessary.¹²³ Another major problem of the salary system is the lack of transparency. Information on salaries in the state administration is not available to the general public, it is not included in advertisements for vacant positions, and there is no official statistical data which separates civil servants from other employees in the public sector.¹²⁴

When it comes to the integrity of the civil service, the EC states that there have been no visible improvements in the implementation of existing integrity plans.¹²⁵ On the other hand, according to the data in the Annual Report on the Implementation of the PAR Strategy for 2021, activities related to employee training and development of integrity plans have been intensified.¹²⁶ The number of public authorities that have adopted plans is constantly increasing, but difficulties occur when delegating tasks related to integrity. Integrity related tasks are usually performed by one or more civil servants for whom the jobs are not originally in the job descriptions, while human resource management units are not always involved.¹²⁷

Finally, in the available Report on Compliance with the Code of Conduct of Civil servants for 2022, the High Civil Service Council states that the degree of compliance with the Code is satisfactory, given that a small number of citizen complaints were registered, i.e., a small number of disciplinary procedures were initiated in relation to the number of employees. However, it is also stated that it is still necessary to work on informing citizens about the possibilities of submitting complaints on the work of state administration bodies and officials, and an uneven practice among the administration bodies regarding the publication of the Code on websites was noted.¹²⁸

116 Ibid, page 63.

117 European Commission, *Serbia 2021 Report*, page 15.

118 European Commission, *Serbia 2022 Report*, page 16.

119 Ibid.

120 Law on the remuneration system of employees in the public sector, Official Gazette no. 18/2016, 108/2016, 113/2017, 95/2018, 86/2019, 157/2020 and 123/2021.

121 European Commission, *Serbia 2021 Report*, page 16.

122 SIGMA, *Monitoring Report for Serbia*, 2021, page 79.

123 Public administration reform strategy for the period 2021 – 2030, page 129. Official Gazette no. 42/2021 and 9/2022.

124 SIGMA, *Monitoring Report for Serbia*, 2021, page 79.

125 European Commission, *Serbia 2022 Report*, page 17.

126 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the Implementation of the PAR Strategy for 2021-2030*, page 52.

127 Ibid, page 85.

128 The report is available on the Human Resource Management Service's website: <http://bitly.ws/Jbpm> (accessed May 1, 2023).

IV.3 What does WeBER monitor and how?

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, monitoring encompasses the civil service of the central government, as defined by the relevant legislation (primarily the Civil Service Law). The selected principles are those that focus on the quality and practical implementation of the civil service legal and policy frameworks, on measures related to merit-based recruitment, use of temporary engagements, transparency of the remuneration system, integrity and anti-corruption in the civil service. The WeBER approach was based on elements which SIGMA does not strongly focus on in its monitoring, but which are significant to the civil society from the perspective of transparency of the civil service system and government openness, or 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 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 the findings of SIGMA's assessment within specific sub-indicators. In addition, monitoring is based on WeBER's expert review of legislation, documents and websites, including collection and analysis of government administrative data, reports and other documents searched for online or requested through freedom of information (FOI) requests. To create a more balanced qualitative and quantitative approach, research included the measuring of perceptions of civil servants, CSOs and the wider public by employing 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 of governmental institutions in charge of the human resource management policy.

The survey of civil servants and CSOs in six administrations of the Western Balkans was conducted with the help of an online survey tool, between March and June 2022.¹²⁹ The civil servants' survey was, in most administrations, disseminated through a single contact point originating from national institutions responsible for the overall civil service system.¹³⁰ The CSO survey was distributed through existing networks and platforms of civil society organisations with large contact databases, but also through centralised points of contact such as governmental offices in charge of cooperation with civil society.¹³¹ To ensure that the CSO survey targeted as many organisations as possible in terms of their type, geographical distribution, and activity areas, and hence

¹²⁹ Surveys were administered through an anonymous, online questionnaire. The data collection method included CASI (computer-assisted self-interviewing). In Serbia, the survey of civil servants was conducted from May 9th to June 20th, 2022, and the CSO survey was conducted from March 23rd to June 28th, 2022.

¹³⁰ For Serbia, the sample for the survey was N=1344. The number of respondents in the questions for Principle 2 was n=1255, for Principle 3 n=1344 respondents, for Principle 4 n=1183 respondents, for Principle 5 n=1171 respondents, and for Principle 7 n=1156 respondents.

¹³¹ For Serbia, the sample of respondents for the survey was N=150. The sub-sample for the PSHRM area was n=121 respondents.

contributed to its representativeness as much as possible, 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, from May 4th to May 31st, 2022.¹³² In all three surveys, WeBER applied 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 the civil service and employees in the central state administration. In the second indicator, monitoring includes the extent to which widely applied temporary engagement procedures undermine the merit-based regime. Openness, transparency, and fairness of recruitment into the civil service, as a particularly critical aspect of HRM in the public administration due to its public facing character, is examined within the third indicator. The fourth indicator places focus on the prevention of direct and indirect political influence on senior managerial positions in the public service, while the fifth indicator analyses whether information on the civil service remuneration is transparent, clear, and publicly available. Finally, in the sixth indicator, WeBER examines the promotion of integrity and prevention of corruption in the civil service.

IV.4 WeBER monitoring results

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

Table 11: Public availability of statistics and reports about the civil service and employees in central state administration.

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. The Government keeps reliable data pertaining to the public service	0/4	0/4	0/4
E2. The Government regularly publishes basic official data pertaining to the public service	0/4	0/4	0/4
E3. Published official data includes data on employees other than full-time civil servants in the central state administration	0/4	0/4	0/4
E4. Published official data on public service is segregated based on gender and ethnic structure	0/2	0/2	0/2
E5. Published official data is available in open data format(s)	0/1	0/1	0/1
E6. The government comprehensively reports on the public service policy	2/4	2/4	2/4
E7. The government regularly reports on the public service policy	1/2	1/2	1/2
E8. Reports on the public service include substantiated information concerning the quality and/or outcomes of the public service work	1/2	1/2	1/2
E9. Data and information about the public service are actively promoted to the public	2/2	2/2	0/2
Total score	6/25	6/25	4/25
Indicator value (scale 0-5)¹³³	1	1	0

¹³² Perceptions are explored using a survey targeting the public (aged 18 and older) in the Western Balkans. The public perception survey employed a multi-stage probability sampling and was administered combining computer-assisted web and telephone interviewing (CAWI, and CATI), using a standardized questionnaire through omnibus surveys in Western Balkans in the period from May 4th to May 31st, 2022. For Serbia, the margin of error for the total sample of 1005 citizens it is $\pm 3.14\%$.

¹³³ Conversion of points: 0–5 points=0; 6–9 points=1; 10–13 points =2; 14–17 points =3; 18–21 points =4; 22–25 points =5.

The practice of publishing relevant data on the civil service system has not improved compared to the previous monitoring cycle. Available data and reports are not published regularly and do not contain all the information that could provide a comprehensive overview of the various aspects of the civil service system. However, it should be emphasised that the publicly available reports have been actively promoted to the public by the relevant authorities.

The score for the first element of this indicator relied on the SIGMA assessment. The findings show that the centralised information system for HRM is still not operational, which makes it impossible to analyse the state of the civil service system. The current database - Central Personnel Register - does not contain all relevant data, such as the total number of employed civil servants, the number of employees per administrative body, etc. Additionally, there is no publicly available data on the number of civil servants on the website of the Government, the Human Resource Management Service (HRMS), or the Ministry of Public Administration and Local Self-Government (MPALSG).

Certain pieces of data can be found in the publicly available Report on compliance with the Code of Conduct of Civil Servants for 2021, such as the number of civil servants employed in the administrative authorities that submitted data to the High Civil Service Council for the purposes of compiling this Report. However, the data is not broken down by ranks of civil service or authorities, and not all of them submitted necessary data for reporting purposes.¹³⁴ Therefore, there is no publicly available information about fixed-term employees, the gender structure of employees, or open-format data.

Reporting on the civil service system on an annual level was assessed as moderately comprehensive, as in previous monitoring cycles.¹³⁵ Reports on the professional development of employees are publicly available,¹³⁶ as well as the aforementioned Report on compliance with the Code of conduct of civil servants, which contains information on disciplinary procedures and measures to strengthen integrity, i.e., citizen complaints on the work of public authorities and procedures in cases of violations of the Code by civil servants.¹³⁷ Both types of reports contain general analysis of outcomes and quality of these segments of the civil service system. Additionally, the HRMS produces reports on recruitments, performance appraisals, and career development, but none of them are available to the public, nor is the information on the salary system, which is under the jurisdiction of MPALSG.¹³⁸ Similarly, the reporting is assessed as moderately regular. Namely, only reports on professional development of civil servants have been published regularly since 2018, while the Report on Compliance with the Code of Conduct of Civil Servants was available for 2021 but not for the previous year during the monitoring cycle.

On the other hand, the active promotion of publicly available information about the civil service continued on relevant authorities' official websites and social networks. The National Academy for Public Administration (NAPA) continued to use its website as the main channel for reporting on activities under its jurisdiction, and most of the posts refer to information on trainings for civil servants. The HRMS stands out by utilising social networks (Facebook and Viber group) to promote information about currently announced competitions and competency checks and provides an opportunity for those interested to ask questions within the competence of the HRMS.

134 Human Resource Management Service, Report on Compliance with the Code of Conduct for Civil Servants for 2021, available at: <http://bitly.ws/BKEi> (accessed 17 March 2023)

135 Comprehensiveness implies the availability of reports on various key aspects of the civil service system, namely: 1) planning and recruitment, 2) performance appraisals, 3) career development, 4) training, 5) salaries, 6) disciplinary procedures and 7) integrity measures.

136 On the official website of the National Academy for Public Administration, annual reports on evaluations of implemented training programs for civil servants are available since 2018. In addition, a report on the assessment of the need for organising trainings for employees in the civil service for the year 2022 was prepared. Available at: <https://bit.ly/2EOS7vD> and <http://bitly.ws/BKHc> (accessed 17 March 2023)

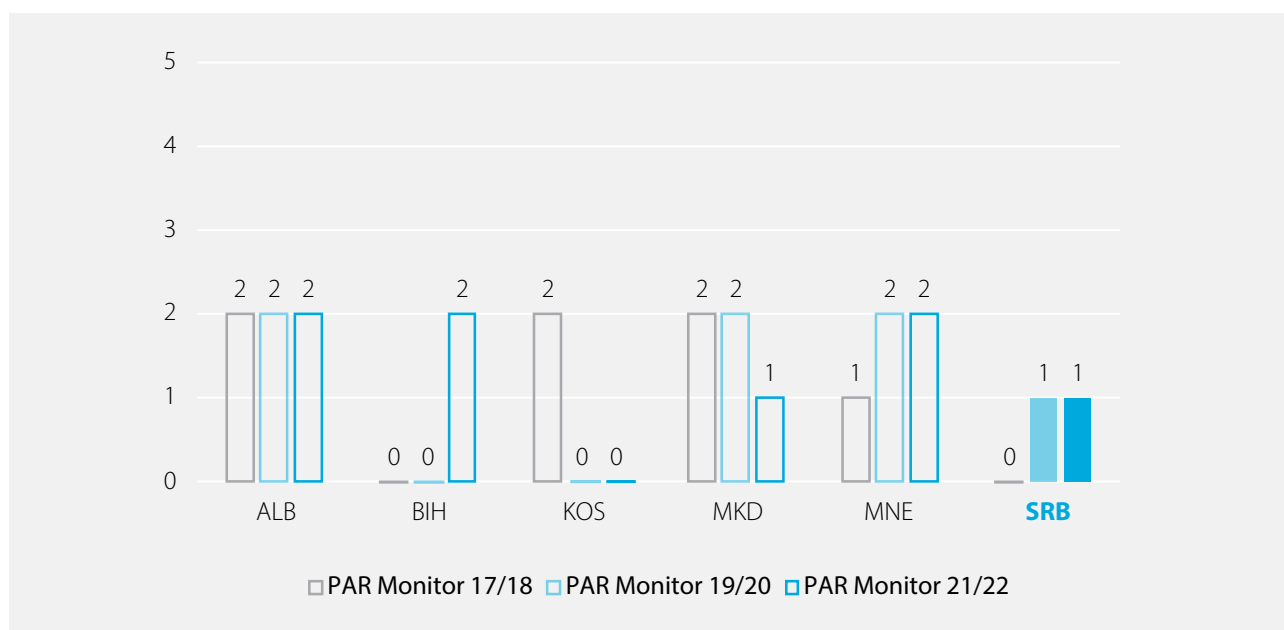
137 The Report on compliance with the Code of Conduct for Civil Servants for 2021 is available on the official website of the Human Resource Management Service. Available at: <http://bitly.ws/BKEi> (accessed 17 March 2023)

138 The request for access to information of public importance was sent to the Human Resource Management Service on June 2nd, 2022, and the answer was received on June 14th, 2022.

During this monitoring cycle, no progress was recorded compared to PAR Monitor 2019/2020. There is still no progress regarding the publication of official data on the civil service system. The regularity of reporting and the comprehensiveness of available reports on the civil service system are moderate. On the other hand, certain authorities, such as NAPA and HRMS, actively promoted online information within their jurisdiction. Given that no significant changes were recorded compared to the previous cycle, the value of this indicator remained at 1.

■ How does Serbia do in regional terms?

Chart 12: Public availability of statistics and reports about the civil service and employees in central state administration



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

Table 12: Performance of tasks characteristic for civil service outside of the civil service merit-based regime

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. The number of temporary engagements for performance of tasks characteristic of civil service in the central state administration is limited by law	4/4	4/4	4/4
E2. There are specific criteria determined for the selection of individuals for temporary engagements in the state administration	0/4	0/4	0/4
E3. The hiring procedure for individuals engaged on temporary contracts is open and transparent	0/4	0/4	0/4
E4. Duration of temporary engagement contracts is limited	0/4	0/4	0/4
E5. Civil servants perceive that temporary engagements in the administration are an exception	0/2	0/2	0/2
E6. Civil servants perceive that performance of tasks characteristic of civil service by individuals hired on a temporary basis is an exception	0/2	0/2	0/2
E7. Civil servants perceive that appointments on a temporary basis in the administration are merit-based	1/2	1/2	1/2

E8. Civil servants perceive that the formal rules for appointments on a temporary basis are applied in practice	1/2	1/2	1/2
E9. Civil servants perceive that individuals hired on a temporary basis go on to become civil servants after their contracts end	0/2	0/2	0/2
E10. Civil servants perceive that contracts for temporary engagements are extended to more than one year	0/2	0/2	0/2
Total score	6/28	6/28	6/28
Indicator value (scale 0-5)¹³⁹	1	1	1

No improvement was recorded regarding the temporary engagements in the civil service, i.e., criteria and procedures regulating them. Also, civil servants' perception of these issues remains unchanged from cycle to cycle, which suggests that problems related to temporary engagement continue.

Limits on the number of temporarily engaged individuals can be found in Article 27k of the Budget System Law, which mandates that the total number of fixed-term employees (except for interns), persons engaged under a service contract, or other forms of temporary engagement, cannot exceed 10% of the total number of permanent employees of budget beneficiaries.¹⁴⁰ This article also prescribes an exception to this rule - in the case of an increased workload, the number of temporarily engaged individuals may exceed 10% of the total number of permanent employees, with the consent of the Government and at the proposal of the relevant authority, with the prior opinion of the Ministry.

However, the criteria for the selection of fixed-term employees are still not clearly defined, neither in the Labor Law nor in the Law on Civil Servants, for all the bases of such work engagements. As an exception, such conditions are defined in the case of temporary engagement due to temporarily increased workload and for internships. Namely, Article 63 of the Law on Civil Servants prescribes that in these cases, there is an obligation to conduct a public competition based on which the person will be hired. Exceptionally, the Law stipulates that in the case of hiring due to increased workload, there will be no obligation to conduct a competition if the person has participated in a public competition conducted by a state authority in the previous four years and has met selection criteria for a workplace.¹⁴¹ However, given that this is just one possible case for temporary engagement, engagement procedures remain largely non-transparent.

Additionally, there are no clearly defined duration limits for temporary engagement contracts. According to the Labor Law, temporary engagement contracts cannot be concluded for activities that last longer than 120 days within a calendar year, while no maximum duration is prescribed for service contracts. The Law on Civil Servants clearly defines limitation only for the duration of temporary engagement due to increased workload (6 months) and internships (6 to 9 months).¹⁴² Given that there are no explicit time limits for the duration of all types of contracts, this element, as in previous cycles, was given the lowest score.

Results of the survey of civil servants show little progress compared to the previous cycle. Only 20% of surveyed civil servants believe that temporary engagement in the state administration is an exception, which represents a drop of 7 percentage points compared to the previous cycle, while approximately half of the respondents disagree that this practice is an exception. Additionally, approximately 44% of them believe temporarily engaged persons often or always perform tasks characteristic of civil servants, and 23% think this rarely or never happens. Moreover, in the previous cycle, 40% of respondents expressed the opinion that temporary engagements are always or often based on merit, while in this cycle, 33.5% of them share that opinion, and almost a quarter of

139 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

140 Budget System Law, Article 27k, Official Gazette of the Republic of Serbia no. 54/2009, 73/2010, 101/2010, 101/2011, 93/2012, 62/2013, 63/2013 - corrected, 108/2013, 142/2014, 68/2015 - other law, 103/2015, 99/2016, 113/2017, 95/2018, 31/2019, 72/2019, 149/2020, 118/2021, 138/2022 and 118/2021 - other law, available at: <http://bitly.ws/BQig> (accessed 20 March 2023)

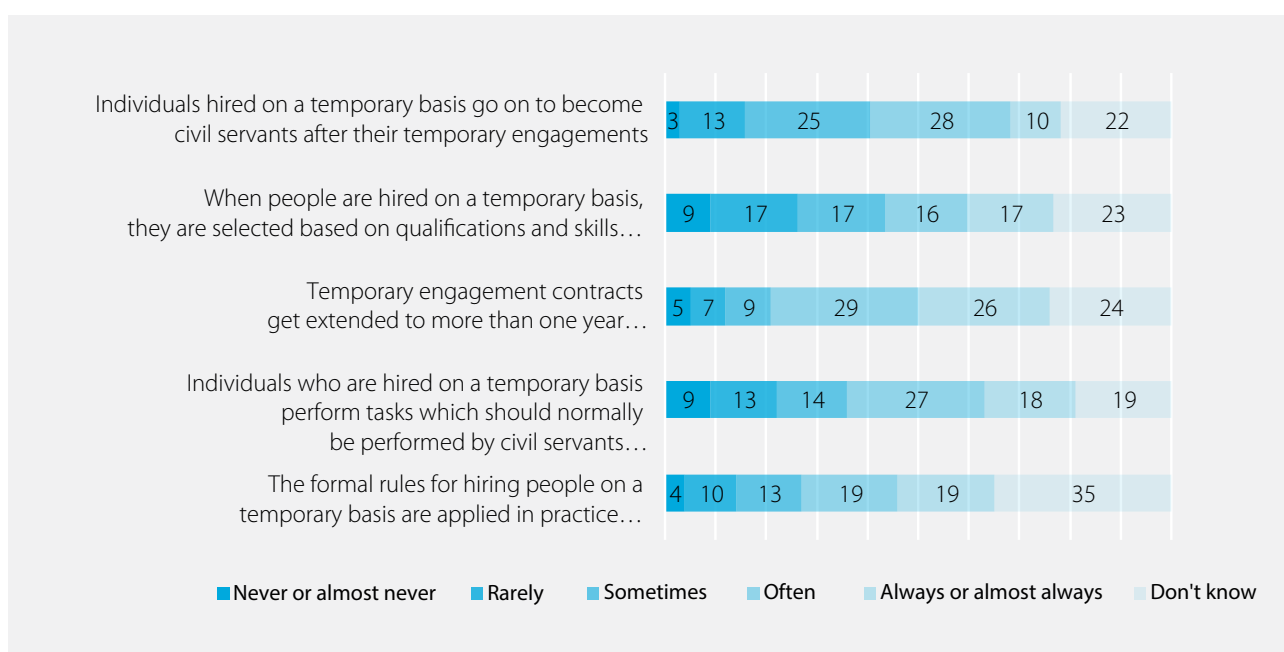
141 Law on Civil Servants, Article 63, Official Gazette of the Republic of Serbia no. 79/2005, 81/2005 - corrected, 83/2005 - corrected, 64/2007, 67/2007 - corrected, 116/2008, 104/2009, 99/2014, 94/2017, 95/2018, 157 /2020 and 142/2022, available at: <http://bitly.ws/Afdq> (accessed 20 March 2023)

142 Provisions regulating these issues can be found in Articles 63, 103 and 104 of the Law on Civil Servants, i.e., in Articles 197 and 199 of the Labor Law.

respondents chose the option “I don’t know” (23%). Such results suggest that civil servants remain convinced that the principles of meritocracy are generally not applied in practice.

Similarly, a slight drop in perception was noted when it came to applying the regulations for temporary engagement in practice. In the previous cycle, 41.5% of civil servants pointed out that the regulations are always or often applied, while according to the last survey, around 38% of them believe that this is the case, and more than a third of them chose the option “I don’t know” (35%). Additionally, 37% of respondents believe that persons who are temporarily engaged often or always become civil servants after their temporary engagements, with a significantly smaller share (16%) of those who believe that this happens rarely or never. When it came to the duration of temporary engagement contracts, as many as 55% of them pointed out that, in practice, such contracts are often or always extended for more than a year, while 12% of respondents believed that this happens rarely or never. Overall, a slight drop in perception was recorded, indicating the long-standing, firm position of civil servants that it is necessary to direct more attention to improving the legal framework and consistency of application.

Chart 13: Perception of civil servants on temporary engagement in the civil service (%)

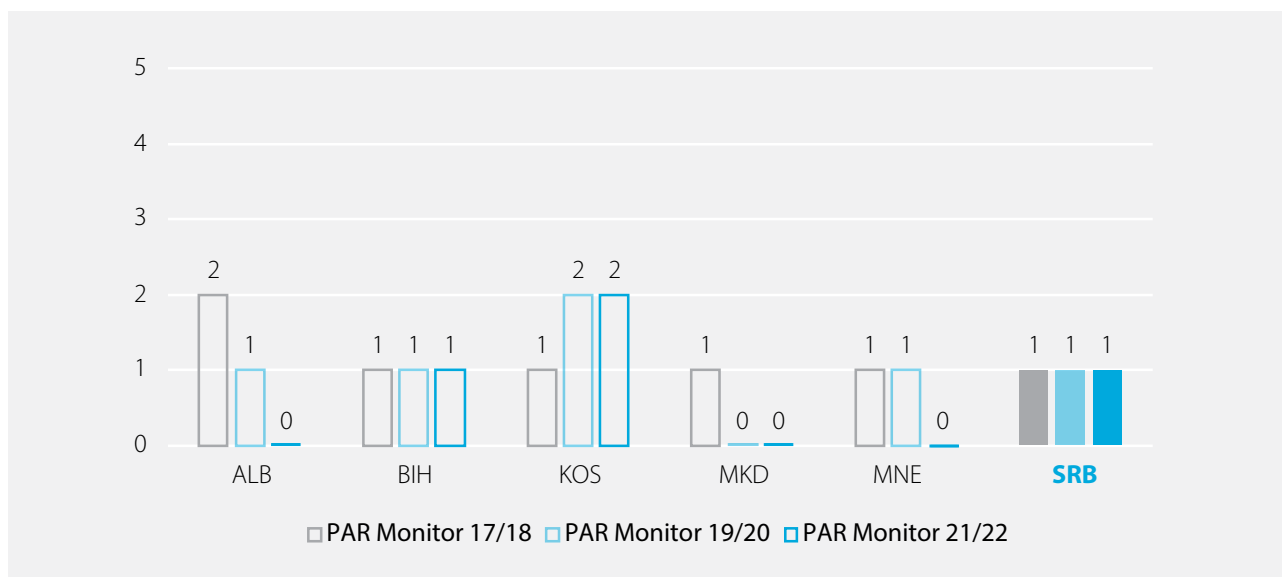


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1255.

There were no changes compared to the previous PAR Monitor, and the value of this indicator remains 1. In particular, no progress was recorded regarding the clarity of the criteria for the selection of temporarily engaged personnel in the civil service, the precise limitations of temporary engagement contracts, as well as the transparency and openness of hiring procedure. The perception of civil servants on issues related to temporary engagements remained unchanged, with smaller percentage differences compared to the previous monitoring cycle, which had no impact on the final assessment.

■ How does Serbia do in regional terms?

Chart 14: Performance of tasks characteristic for civil service outside of the civil service merit-based regime central state administration



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

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

Table 13: Openness, transparency and fairness of recruitment into the civil service

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Information about public competitions is made broadly publicly available	4/4	2/4	4/4
E2. Public competition announcements are written in a simple, clear, and understandable language	0/4	0/4	0/4
E3. During the public competition procedure, interested candidates can request and obtain clarifications, which are made publicly available	4/4	2/4	2/4
E4. There are no unreasonable barriers for external candidates which make public competitions more easily accessible to internal candidates	0/2	0/2	0/2
E5. The application procedure imposes minimum administrative and paperwork burden on candidates	4/4	4/4	0/4
E6. Candidates are allowed and invited to supplement missing documentation within a reasonable timeframe	0/4	0/4	0/4
E7. Decisions and reasoning of the selection panels are made publicly available, with due respect to the protection of personal information	2/4	2/4	0/4
E8. Information about annulled announcements is made publicly available, with reasoning provided	0/4	0/4	0/4
E9. Civil servants perceive the recruitments into the civil service as based on merit	1/2	1/2	0/2
E10. Civil servants perceive the recruitment procedure to ensure equal opportunity	2/2	2/2	1/2

E11. The public perceives the recruitments done through the public competition process as based on merit	1/2	1/2	0/2
Total score	18/36	14/36	7/36
Indicator value (scale 0-5)¹⁴³	2	2	1

Slight progress was noted in terms of the availability of information about competitions and the possibility of candidates to obtain clarifications related to the competition procedure, which are available at the “Candidates corner” on the HRMS website. Other aspects remained unchanged compared to the PAR Monitor 2019/2020.

Analysis of five public competitions conducted during 2021 indicated that progress has been made on the availability of information on public competitions compared to the previous monitoring cycle. Announcements of the competitions conducted by the authorities in the sample - the Ministry of Foreign Affairs (MFA), the Ministry of Finance (MoF), the Ministry of Culture and Information (MCI), the Administration for Joint Affairs of the Republic Bodies (AJARB) and the General Secretariat of the Government - mostly met the criteria related to the number and type of channels used to advertise vacancies (table 14). Additionally, all competitions were advertised on the official Facebook page of the HRMS, except for competitions conducted by the MCI and MoF. However, the eGovernment Portal, prescribed by law as the point for publishing competition announcements, does not contain individual announcements but only leads to the websites of the HRMS and NES, where all current competitions are listed.¹⁴⁴

Table 14: Overview of online channels used to advertise jobs in the state administration

	Website of the institution	HRMS website	eGovernment portal	National Employment Service
Ministry of Foreign Affairs	✓	✓	✓	✓
Ministry of Culture and Information	✓	✓	✓	✓
Ministry of Finance	✓	✓	✓	✓
Administration for Joint Affairs of the Republic Bodies	✓	✓	✓	✓
General Secretariat of the Government	X	✓	✓	✓

On the other hand, no progress has been recorded in terms of adapting the texts of public competitions to potential candidates. The authorities still use bureaucratic language, which cannot be assessed as easily understandable to candidates with no prior experience working in the state administration. At the same time, the texts are still very extensive, which makes it more difficult to fully comprehend the conditions. However, it should be emphasised that the HRMS continuously makes efforts to make the competition procedures easier for potential candidates and prepares summaries of each announcement that contain the most important information. Representatives of the HRMS suggested that changes to the legislative framework would improve this area because they foresee a certain form of competition announcements that does not leave much room for creativity.¹⁴⁵ Additionally, the HRMS regularly uses YouTube, Facebook, Viber group, and the Candidates’ Corner on its website to communicate with interested parties in a simple and understandable way.¹⁴⁶ This section provides information on current competitions, materials for the preparation for selection process, guides, a survey on the level of satisfaction with the quality of the competition procedure, and other useful information.

143 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

144 Certain information on the ways of announcing the competitions was obtained based on the request for access to information of public importance sent to AJARB. A request was sent to AJARB on July 12th, 2022. The section of the eGovernment portal, which is dedicated to job vacancies, is available at: <http://bitly.ws/BR5a> (accessed 20 March 2023)

145 The interview with HRMS representatives was held on September 7th, 2022.

146 The candidates’ corner is available on the HRMS website: <https://kutak.suk.gov.rs/> (accessed 21 March 2023)

The analysis of the sample of competitions showed progress regarding the possibility of candidates to receive the necessary clarifications during the competition procedure. In accordance with the Article 55 of the Law on Civil Servants, the name and contact of the person in charge of providing information regarding the competition is listed in the text of each announcement.¹⁴⁷ A step forward compared to the previous cycle, and a good-practice example, is the section with the most frequent questions and answers on the HRMS website, which was created based on the questions that the candidates asked in the past competition procedures.¹⁴⁸ The questions and answers are divided into sections according to the stages of the competition procedure, which makes it even easier for candidates. Four out of five institutions that announced the competitions pointed out that the candidates did not express the need for additional clarifications.¹⁴⁹ The Ministry of Finance confirmed that they received in-person requests for clarifications that were addressed in the same way, so there is no written trail.

However, as in the two previous monitoring cycles, the obligation to take a state exam for senior civil servants represents an obstacle for candidates with no prior experience working in the civil service. Given that the deadline for submitting evidence of passing the state exam remains 20 days from the deadline for applying for the competition, no improvement was recorded in this domain.¹⁵⁰ On the other hand, the amendments to the Law on General Administrative Procedure from 2018 helped reduce the administrative and paperwork burden for candidates, primarily thanks to the obligation of administrative bodies to obtain data from civil registries themselves instead of requesting it from candidates. In addition, the Law on Civil Servants stipulates that candidates submit only the application form in the initial phase of the competition, as well as evidence of the fulfilment of competencies in accordance with the requirements of the position if the candidate states that they possess such competencies. Although only the application form is necessary for the initial phase, the potential burden lies in the obligation to submit original documents confirming the possession of competencies, i.e., their certified copies. This is not only an administrative but also a financial burden on the candidate, considering that copies of documents must be certified by public notaries with appropriate financial compensation. On the other hand, it should be noted that the certification of documents is free for unemployed persons.

No change was recorded since the previous PAR Monitor regarding the possibility of supplementing documentation during the competition procedure. Candidates are not granted such an opportunity, while the state administration authorities pointed out that there were no such requests within the analysed sample of competitions.¹⁵¹ Similarly, no progress has been recorded regarding the transparency of the competition outcomes. Publicly available data on the selected candidates exist for three of the five analysed competitions (listed in accordance with the rules for personal data protection), while the reasoning behind the decisions of selection panels has not been made public in any of these cases.

Additionally, when it comes to annulled competitions, the Law on Civil Servants prescribes the obligation that all participants should be personally informed if the competition is unsuccessful. However, it does not emphasise whether it is necessary to make that information publicly available or whether information about unsuccessful competitions due to no applications submitted should be made public.¹⁵² No publicly available explanations for the annulment of competitions in the sample were found, but such information was provided in response to the request for free access to information.

The perception of civil servants remained unchanged compared to the previous cycle. According to the survey data, 43% of respondents agree or completely agree that civil servants are employed based on qualifications and skills. In comparison, 27% do not believe this is the case. Additionally, 36% of respondents believe that candidates need to have connections in order to get a job in their institutions, while 29% of them disagreed

147 Law on Civil Servants, Article 55.

148 Available at: <http://bitly.ws/BTbn> (accessed 21 March 2023)

149 Requests for access to information were sent on July 12th, 2022.

150 Regulation on internal and public competition for filling vacancies in state bodies, Article 11. Available at: <http://bitly.ws/BTp7> (accessed 21 March 2023)

151 Requests for access to information of public importance were sent on July 12th, 2022.

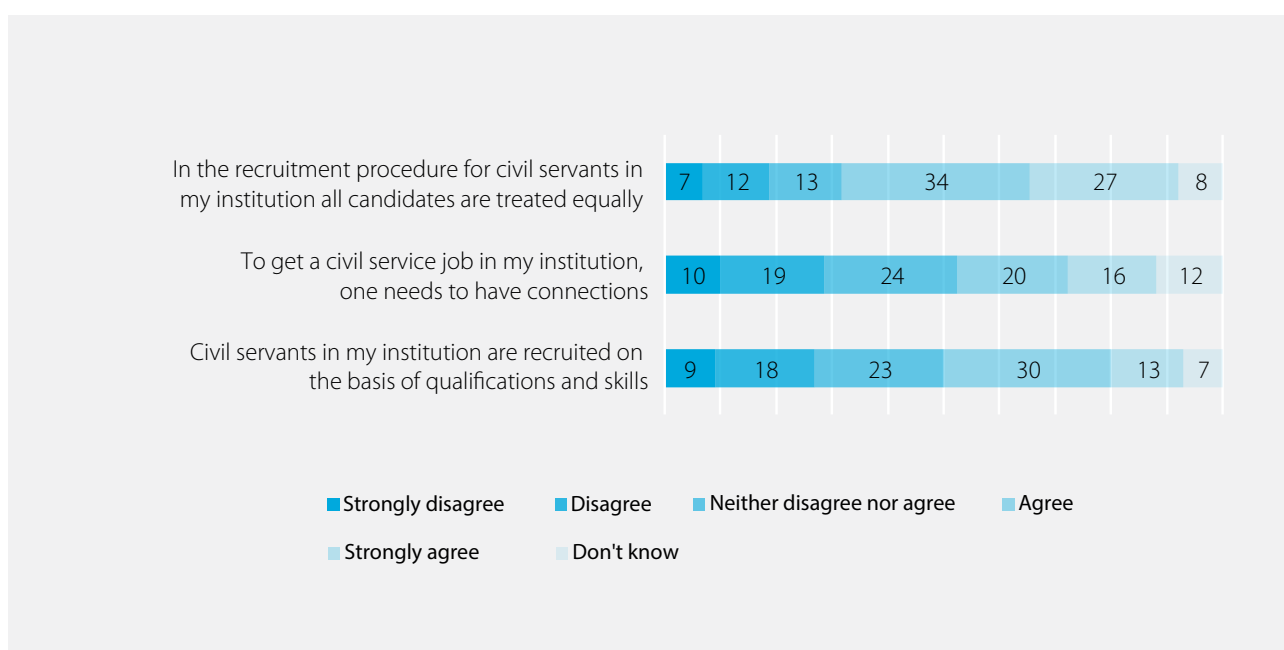
152 Law on Civil Servants, Article 60.

with this statement. For both questions, a significant share of respondents remained neutral (23-24%), which may suggest that a large number of civil servants does not want to express a firm position on these sensitive issues.

On the other hand, the perception is mostly positive when it comes to equal opportunities for all candidates. Specifically, 61% of them agree or completely agree that, in the recruitment procedures, all candidates are treated equally, regardless of gender, ethnicity or any other personal characteristic. Civil servants in Serbia have expressed the most positive perception on this issue since the initial PAR Monitor 2017/2018.

Public perception remains largely unchanged. More than a third of citizens agree that civil servants are hired on merit-based public competitions (37%), while the majority's opinion is the opposite (55% think this is not the case). Considering all the survey cycles so far, public perception clearly indicates a lack of trust in the integrity of recruitment procedures in the state administration.

Chart 15: Civil servants' perception of merit-based recruitment in the civil service (%)

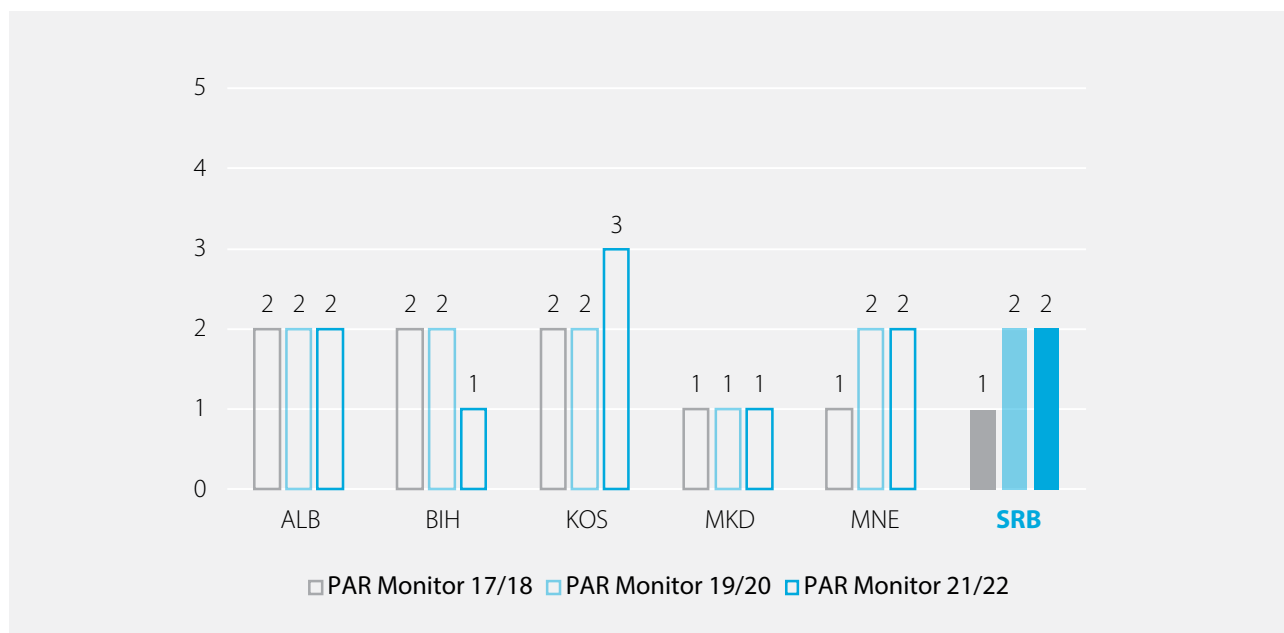


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1344.

Compared to the previous monitoring cycle, the availability of information on public competitions has somewhat improved, as well as the possibility for candidates to obtain clarifications. In addition, the changes in the legislative framework led to a reduction of the administrative burden for candidates in the initial stage of competition procedures since they only submit an application form. On the other hand, there were no significant developments when it comes to simplifying texts of announcements for potential candidates outside the state administration, while the obligation for candidates for senior civil service positions to pass state exam still represents a significant obstacle. Additionally, candidates are not allowed to supplement incomplete documentation, and information about annulled competitions remains publicly unavailable. The moderately positive perception of recruitment process among civil servants has not changed significantly in the two-year period, nor has the majorly negative perception of the public.

■ How does Serbia do in regional terms?

Chart 16: Openness, transparency and fairness of recruitment into the civil service



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

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

Table 15: Effective protection of senior civil servants' positions from unwanted political interference

Indicator element	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. The Law prescribes competitive, merit-based procedures for the selection of senior managers in the civil service	1/2	1/2	2/2
E2. The law prescribes objective criteria for the termination of employment of senior civil servants	2/2	0/2	0/2
E3. The merit-based recruitment of senior civil servants is efficiently applied in practice	2/4	0/4	0/4
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	2/4	0/4	0/4
E5. Ratio of eligible candidates per senior-level vacancy	0/4	0/4	4/4
E6. Civil servants consider that the procedures for appointing senior civil servants ensure that the best candidates get the jobs	0/2	1/2	0/2
E7. CSOs perceive that the procedures for appointing senior civil servants ensure the best candidates get the jobs	0/2	0/2	0/2
E8. Civil servants perceive that senior civil servants are appointed based on political support	0/2	0/2	0/2
E9. Existence of vetting or deliberation procedures on appointments of senior civil servants outside of the scope of the civil service legislation	0/2	0/2	0/2
E10. Civil servants consider that senior civil servants would not implement and can effectively reject illegal orders of political superiors	0/2	1/2	0/2

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	0/2	0/2	0/2
E12. Civil servants perceive that senior civil servants are not dismissed for political motives	0/2	1/2	0/2
E13. Civil servants consider the criteria for dismissal of senior public servants to be properly applied in practice	0/2	0/2	0/2
E14. CSOs consider senior managerial civil servants to be professionalised in practice	0/2	0/2	0/2
E15. Civil servants perceive that senior civil servants do not participate in electoral campaigns of political parties	0/2	0/2	0/2
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	0/4	0/4	0/4
Total score	7/40	4/40	6/40
Indicator value (scale 0-5)¹⁵³	0	0	0

In order to measure the effectiveness of the protection of senior civil servants from political influence, the PAR Monitor uses the scores from the SIGMA assessment for elements 1, 2, 3 and 5. According to the latest SIGMA report for Serbia, the meritocracy of the procedure for selecting candidates for senior civil servants' positions is only partially prescribed, and the application of this principle in practice is also partial. On the other hand, SIGMA states that the legally prescribed criteria for the dismissal of senior civil servants are objective.¹⁵⁴ Additionally, it is pointed out that the ratio of the number of candidates to the number of advertised vacancies for these positions is still not satisfactory due to the practice of appointing acting senior civil servants without competition.¹⁵⁵ It should be noted that when it comes to elements 2 and 3, which rely on the SIGMA score, there was an increase in the scores compared to the previous monitoring cycle.

On the other hand, the Law on Civil Servants stipulates that acting senior civil servants are appointed for a period of six months, with the possibility of an extension for another three, in case internal or public competition announced for filling the position is unsuccessful.¹⁵⁶ However, as in the previous period, the data unequivocally point not only to a large number of acting senior civil servants in practice but also to the fact that the legal provisions are consciously and continuously violated - time limits are not respected, and certain persons remain in the acting status for several years.¹⁵⁷ Furthermore, data on whether acting senior civil servants are appointed from among the existing civil servants is not systematically collected. In this cycle, in the period from January 1st to December 31st, 2021, the Government passed a total of 741 acts on appointment, of which as many as 696, or 94%, were appointments of acting civil servants, and only in 45 cases individuals were appointed based on a competition procedure for a period of 5 years.¹⁵⁸ This aspect of the civil service system remains a long-standing issue that represents the key source of politicisation in the state administration of Serbia.

In this regard, decision-making procedures on the appointment of senior civil servants outside the scope of the Law on Civil Servants are still in force. Namely, as pointed out in the previous editions of this report, the Rules of Procedure of the Government envisage the authority of its Personnel Commission to propose appointments and dismissals of senior civil servants to the Government.¹⁵⁹ Given that the members of this Commission are

153 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

154 Law on Civil Servants, Articles 76-78.

155 SIGMA, *Monitoring Report for Serbia*, 2021, page 75.

156 Law on Civil Servants, Article 67a.

157 The findings were confirmed by an acting senior civil servant who has been in the acting status for eight years. The interview was held on August 6th, 2022.

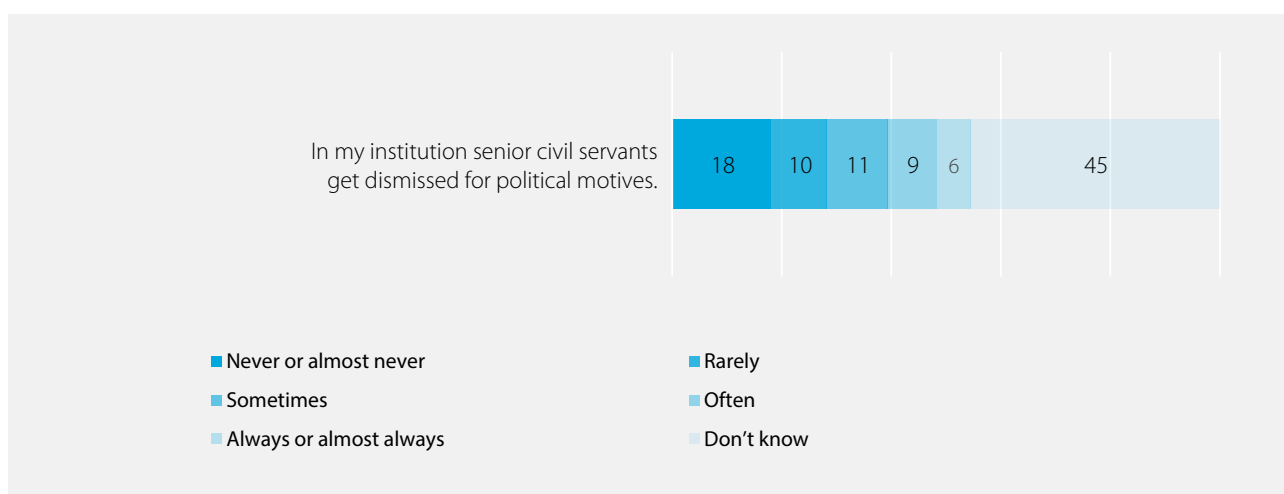
158 The analysis was carried out based on a review of the minutes from each individual session of the Government in 2021, in the part related to personnel decisions. The minutes are available at: <https://www.srbija.gov.rs/prikaz/514434> (accessed 23 March 2023)

159 Rules of Procedure of the Government, Article 31, Official Gazette of the Republic of Serbia no. 61/2006-3 (refined text), 69/2008-3, 88/2009-72, 33/2010-6, 69/2010-3, 20/2011-10, 37/2011-3, 30/2013- 4, 76/2014-3, 8/2019-79 (other regulation). Available at: <http://bitly.ws/A5cj> (accessed 22 March 2023)

also public officials, such actions represent additional political interference during the selection of candidates for senior civil servants that will be proposed to the Government for appointment.

Regarding the perception of civil servants on various aspects of appointment and dismissal procedures, a lower score was recorded in three elements compared to the previous cycle. Namely, 27% of civil servants believe that the appointment procedures ensure the selection of the best candidates for senior civil servants' positions, which represents a drop of 5 percentage points compared to the previous cycle, while 29% of them disagreed with the statement. Additionally, only 28% of the respondents consider that in their institutions, they are rarely or never dismissed due to political motives (a drop of 3 percentage points), while 45% chose „don't know“ answer. Similarly, only 27% of respondents agree that senior civil servants can refuse illegal orders from their superiors without jeopardising their careers. In comparison, 20% disagreed, and more than a third of respondents (36%) did not know.

Chart 17: Perception of civil servants on the dismissal of senior civil servants (%)

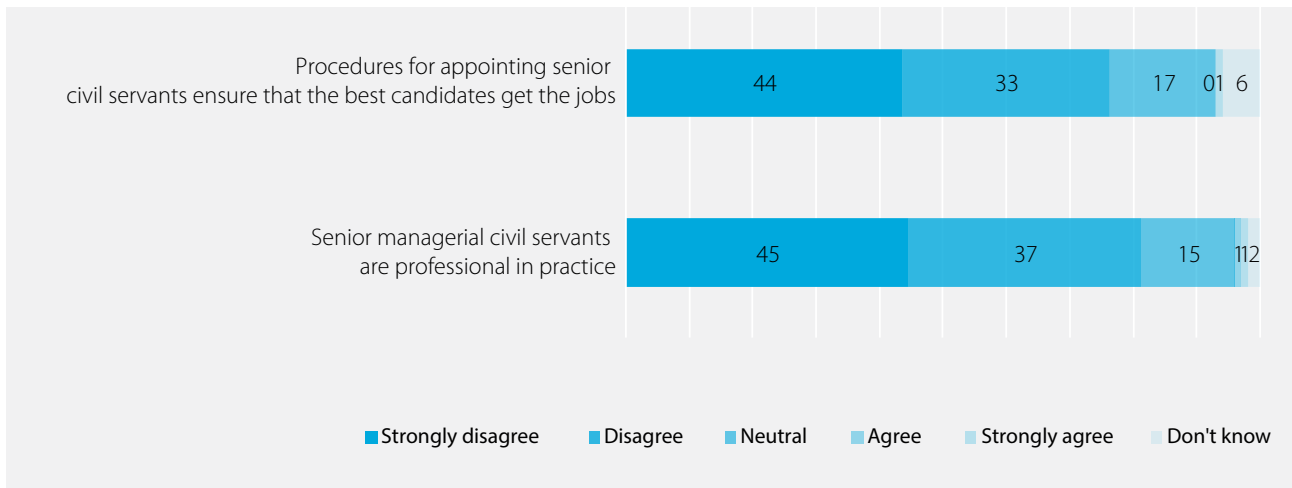


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1183.

In other aspects of the survey, there was no change in the perception of civil servants, and the scores remained low. The percentage of respondents who believe that senior civil servants are appointed partly thanks to political support is as high as 43%, while 14% believe this is not the case. Accordingly, 37% of them agree that senior civil service positions are subject to political agreements and the “division of the cake” between the ruling political parties, while approximately one-third of respondents did not know or want to answer. When it came to the participation of senior civil servants in electoral campaigns of political parties, 41% of respondents chose the option “I don't know / I don't want to answer” as well, while 21% believe that they never participate in these activities. The fact that a large number of respondents, for the third cycle in a row, did not express clear opinions when answering questions in this domain strongly suggests that they refuse to take a firm stand when it comes to the most politically sensitive aspect of the civil service system.

On the other hand, CSOs remained very sceptical about the procedure for appointing senior civil servants, just like in the previous monitoring cycles. A significant majority of respondents do not agree with the statement that the procedures for appointing senior civil servants ensure that the best candidates are appointed (77% disagreement) or that senior civil servants are professionals in practice (82%). Such results prove that CSOs remain very critical towards the integrity of the highest positions within the civil service despite minor changes in percentage points compared to previous cycles.

Chart 18: CSOs' perception of the professionalism of the senior civil service

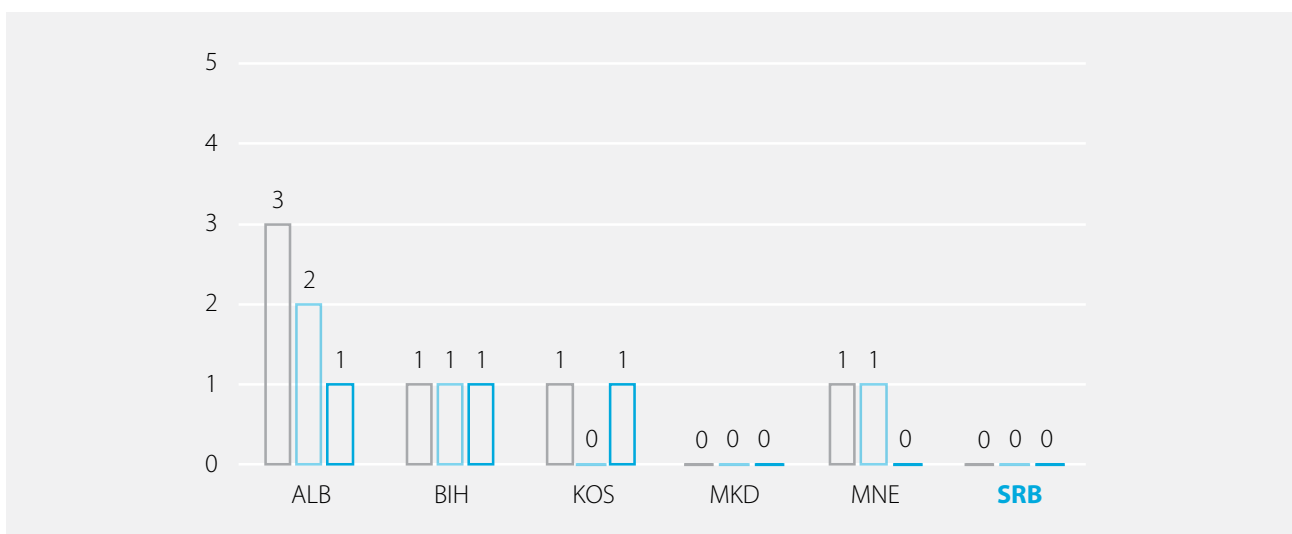


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=121.

According to SIGMA's assessment, the criteria for the selection of senior civil servants are not fully adequate, unlike the criteria for their dismissal. However, the legal framework also stipulates that only currently employed civil servants can be appointed as acting senior civil servants, but data on whether this is followed through is not collected. Additionally, the prescribed maximum duration of acting statuses is still continuously violated, and senior civil servants remain in this status for several years. When it comes to the perception of civil servants, the percentage of those who believe that the appointment procedures ensure the selection of the best candidates has decreased. On the same note, a smaller share of respondents believes that senior civil servants would not implement and would not be able to refuse illegal orders from their superiors. The score of the other elements of this indicator, which refer to the perception of civil servants and CSOs, remained mostly unchanged. Despite the slight score change, the indicator's value did not change.

How does Serbia do in regional terms?

Chart 19: Effective protection of senior civil servants' positions from unwanted political inference



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

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

Table 16: Transparency, clarity and public availability of information on the civil service remuneration system

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. E.1 The civil service remuneration system is simply structured	2/4	2/4	2/4
E2. E.2 The civil service salary/remuneration system foresees limited and clearly defined options for salary supplements additional to the basic salary	4/4	4/4	4/4
E3. E.3 Information on civil service remuneration system is available online	0/6	2/6	2/6
E4. E.4 Citizen friendly explanations or presentations of the remuneration information are available online	0/2	0/2	0/2
E5. E.5 Discretionary supplements are limited by legislation and cannot comprise a major part of a civil servant's salary/remuneration	4/4	4/4	2/4
E6. E.6 Civil servants consider the discretionary supplements to be used for stimulating and rewarding performance	1/2	1/2	0/2
Total score	11/22	13/22	10/22
Indicator value (scale 0-5)¹⁶⁰	2	3	2

The remuneration system in the state administration is regulated by the Law on Salaries of Civil Servants and General Employees, which defines the coefficients for each pay group based on which the salary is calculated.¹⁶¹ However, the salary system remains only partially simple and clear, as in previous cycles, given that several by-laws contribute to the system's fragmentation and introduce special salary regimes for certain positions. For example, the Regulation on salaries and other incomes of employees in the Ministry of Finance-Tax Administration, defines different coefficients for determining salaries and other benefits for their employees.¹⁶² Additionally, a special regime is introduced for employees of the Directorate for Execution of Criminal Sanctions, based on the regulation on coefficients for calculation and payment of salaries,¹⁶³ as well as for employees of the Prosecutor's Office for War Crimes based on the separate regulation.¹⁶⁴ The Regulation on Salaries for Individuals Working in Special Organisational Units of State Institutions Responsible for Combating Organised Crime is also in force. Therefore, the salary system remains largely fragmented due to the large number of by-laws that introduce special regimes.

However, when it comes to salary supplements, it was determined that there are clearly prescribed limitations and options for supplements, as in previous monitoring cycles. The Law on Salaries of Civil Servants and General Employees, in Articles 23-38, defines the conditions under which salary supplements are approved, limits the amount of supplements, as well as the relationships between different types.¹⁶⁵

160 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.

161 Law on Salaries of Civil Servants and General Employees, Official Gazette no. 62/2006-12, 63/2006-20 (correction), 115/2006-149 (correction), 101/2007-4, 99/2010-3, 108/2013-11, 99/2014-10, 95/ 2018-377 and 14/2022-51. Available at: <http://bitly.ws/C4ya> (accessed 24 March 2023)

162 Regulation on salaries and other incomes of employees in the Ministry of Finance - Tax Administration, articles 5 and 7, Official Gazette no. 43/2019-3 and 78/2020-22. Available at: <http://bitly.ws/CadH> (accessed 24 March 2023)

163 Regulation on coefficients for calculation and payment of salaries of employees in the Directorate for Execution of Criminal Sanctions, Official Gazette no. 16/2007-4, 21/2009-17, 1/2011-21, 83/2011-5 and 102/2011-82. Available at: <http://bitly.ws/Cagp> (accessed 27 March 2023)

164 Regulation on salaries for individuals performing the function and performing tasks in the War Crimes Prosecutor's and special organisational units of state institutions in war crimes proceedings, Official Gazette no. 97/2003-1 and 67/2005-3. Available at: <http://bitly.ws/Caik> (accessed 27 March 2023)

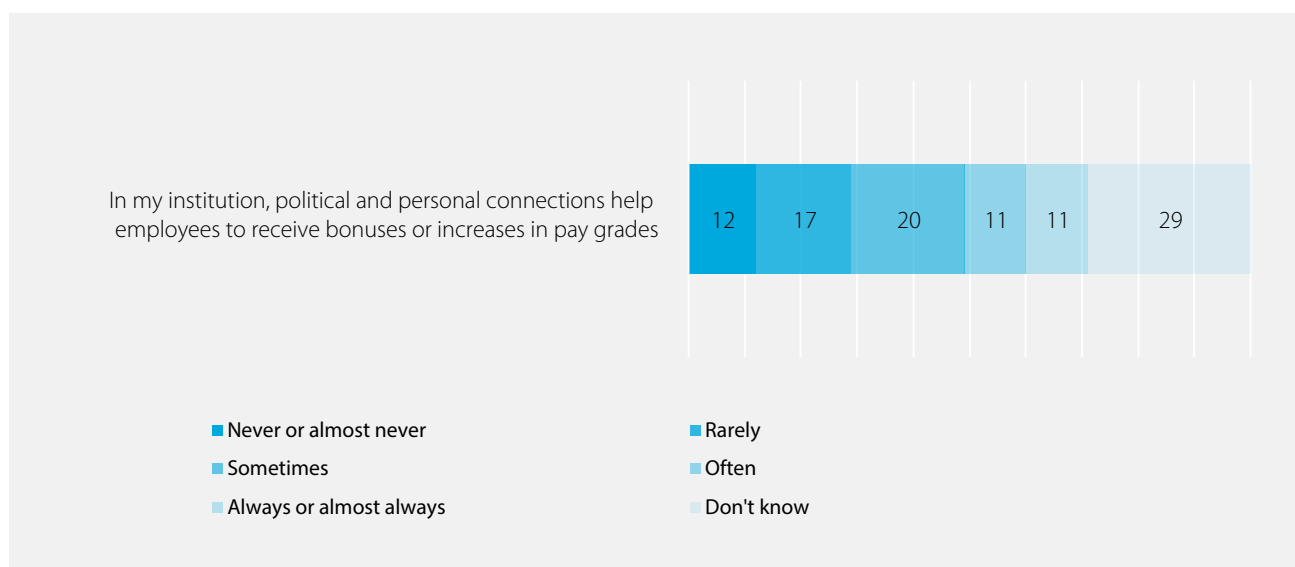
165 Law on Salaries of Civil Servants and General Employees, Articles 23-38.

The PAR Monitor uses the SIGMA score for elements 3 and 5. First, when it comes to the availability of information on the remuneration system in the civil service, a setback was recorded compared to the previous cycle. SIGMA estimates that the salary system is non-transparent, given that the only publicly available information can be found in the Law on Salaries of Civil Servants and General Employees and in the budget laws for each fiscal year. Additionally, the objections refer to the fact that statistical data on salaries exist only for all employees in the public sector, without classifying civil servants and other categories, as well as that job vacancies in the state administration do not contain salary data for announced positions.¹⁶⁶ On the other hand, SIGMA confirms that the criteria related to the legal limitation of discretionary supplements have been met and they do not constitute a major part of the civil servant's salary, i.e., that there is no possibility of receiving a salary bonus in the case of Serbia, but there is possibility of advancement in salary groups based on performance appraisal.¹⁶⁷

There is still no initiative to make information about the salary system citizen friendly. In all monitoring cycles so far, there were no customised explanations or presentations that would make it simple for the interested public to understand the details related to salaries in the Serbian state administration. In this way, salaries in the state administration remain one of the least transparent aspects of the civil service system, with the least information available to the public.

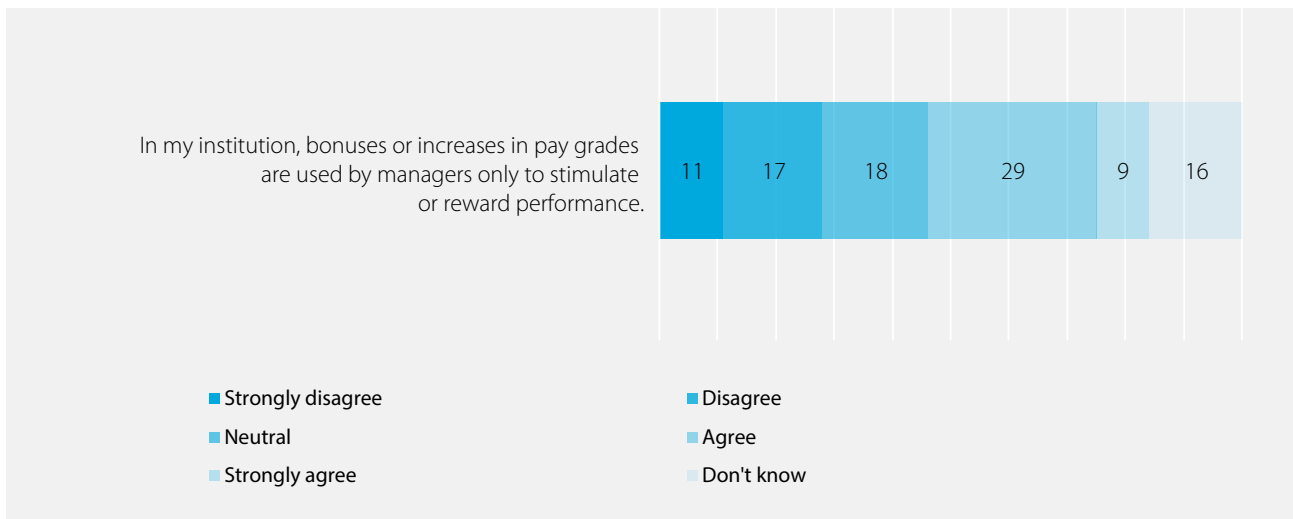
The perception of civil servants on the fairness of the salary system, which remained essentially unchanged compared to the previous monitoring cycle, is assessed based on responses to two statements: (1) "In my institution, bonuses or increases in pay grades are used by managers only to stimulate or reward performance" and (2) "In my institution, political and personal connections help employees to receive bonuses or increases in pay grades" (chart 20 & 21). Slightly over 37% of the respondents agree with the first statement. In comparison, approximately 32% believe that decisions on awarding bonuses or an increase are not made based on political and private connections. However, the percentage of respondents who opted for "don't know" option for the second statement remains high - 29% in this and 30% in the previous cycle, which leads to the conclusion that, even among civil servants, there is still no consensus regarding whether such bonuses exist, and how they are distributed.

Chart 20 & 21: Perception of civil servants on the use of bonuses and relevance of personal and political connections (%)



¹⁶⁶ SIGMA, *Monitoring Report for Serbia*, 2021, page 79.

¹⁶⁷ *Ibid*, pages 78–79.

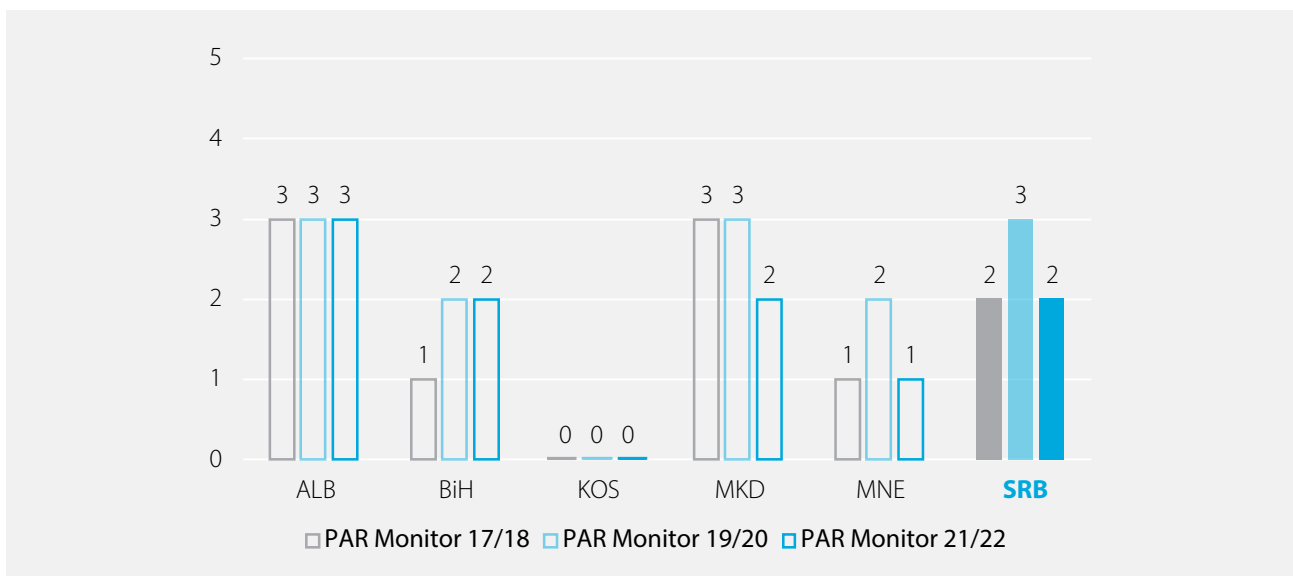


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1171.

Overall, the value of the indicator dropped from 3 to 2. Information on the salaries of civil servants is not publicly available, apart from the general information that can be found in the Law on Salaries of Civil Servants and General Employees, and in the laws on the budget of the Republic of Serbia for each fiscal year. No significant changes were recorded regarding other aspects of the salary system nor in the perception of civil servants regarding awarding bonuses and advancement to higher pay grades.

How does Serbia do in regional terms?

Chart 22: Transparency, clarity, and public availability of information on the civil service remuneration system



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

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

Table 17: Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service

Indicator element	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Integrity and anti-corruption measures for the civil service are formally established in the central administration	4/4	2/4	4/4
E2. Integrity and anti-corruption measures for the civil service are implemented in central administration	2/4	2/4	2/4
E3. Civil servants consider the integrity and anti-corruption measures as effective	1/2	1/2	1/2
E4. CSOs consider the integrity and anti-corruption measures as effective	0/2	0/2	0/2
E5. Civil servants consider that the integrity and anti-corruption measures are impartial	1/2	1/2	1/2
E6. CSOs consider that the integrity and anti-corruption measures in state administration are impartial	0/2	0/2	0/2
E7. Civil servants feel they would be protected as whistle blowers	0/2	0/2	0/2
Total score	8/18	6/18	8/18
Indicator value (scale 0-5)¹⁶⁸	2	1	2

The first two elements rely on SIGMA score from the 2021 report. SIGMA evaluates the measures for improving integrity and fighting corruption within the civil service as adequate. In other words, various aspects of integrity are contained in the Law on Civil Servants and the Law on Prevention of Corruption, while SIGMA also considers the work of the Agency for the Prevention of Corruption as important, particularly activities regarding prevention of conflicts of interest, declaration of assets of officials and keeping a register of gifts.¹⁶⁹ Despite this, there has been no improvement in implementing these measures. SIGMA emphasises that the Law on the Prevention of Corruption expanded the competencies of the Agency when it comes to monitoring the implementation of anti-corruption policies, but without effects, since no strategy for the fight against corruption has been adopted since 2018.¹⁷⁰

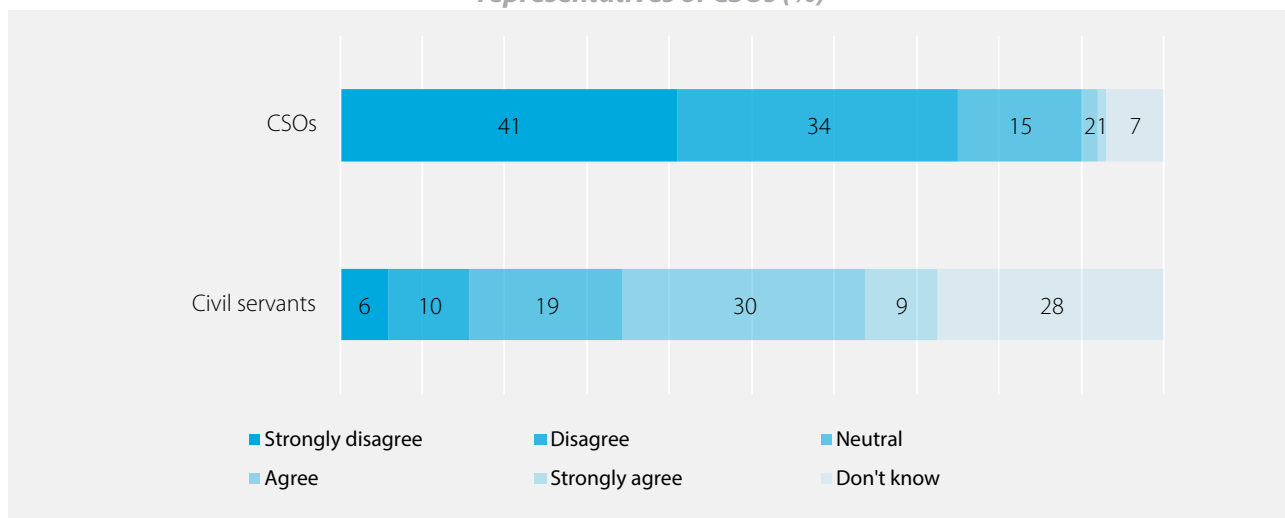
The perception of civil servants and CSOs remained largely unchanged compared to the PAR Monitor 2019/2020, and large differences in the perception of these two groups of respondents are still noticeable. When it comes to established measures for promotion of integrity and fight against corruption, approximately 39% of the surveyed civil servants believe that they are effective, and only 3% of surveyed CSO representatives. Similarly, around 39% of civil servants consider these measures to be impartial, with 2% of CSO representatives confirming so. Nevertheless, despite the fact that slightly more than a third of the surveyed civil servants see these measures as effective and impartial, very few of them would feel protected if they become whistleblowers (14%).

¹⁶⁸ 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.

¹⁶⁹ SIGMA, *Monitoring Report for Serbia*, 2021, page 84.

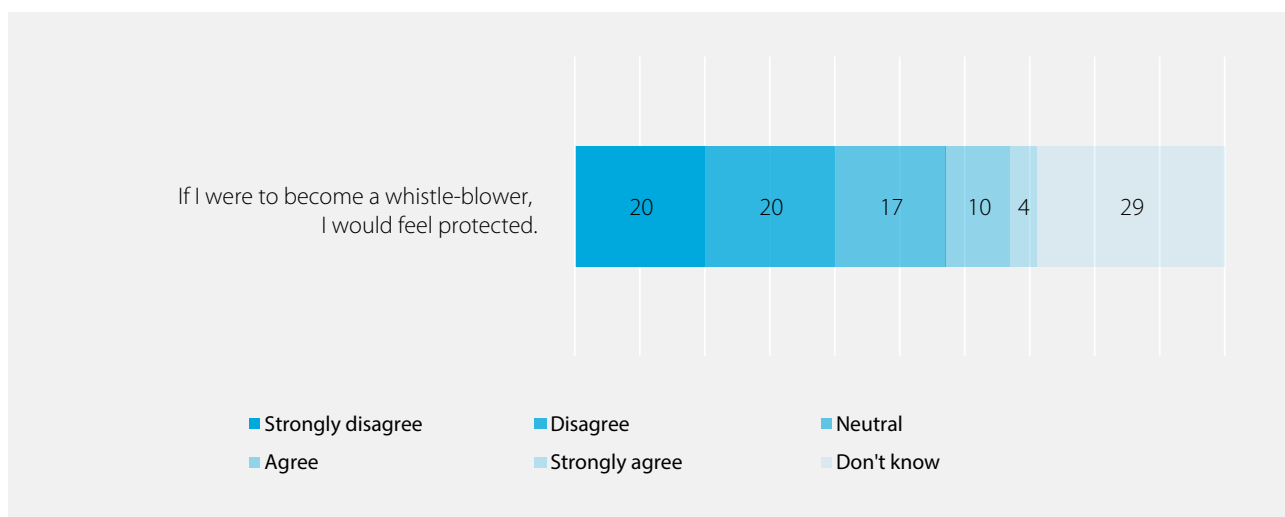
¹⁷⁰ Ibid.

Chart 23: Measures for the protection of integrity and prevention of corruption implemented in my institution/in state administration are effective: comparison of the perception of civil servants and representatives of CSOs (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1156 for civil servants and n=121 for CSOs.

Chart 24: Perception of civil servants on whistleblower protection (%)

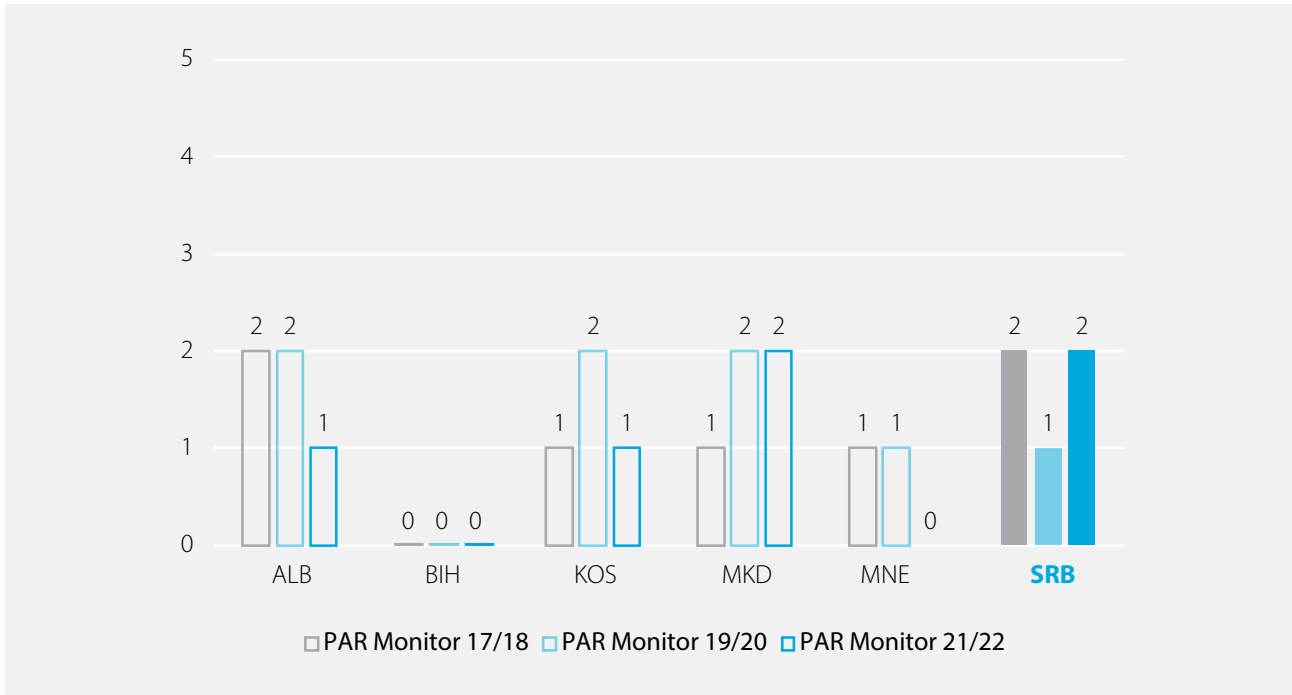


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1156.

The value of the indicator increased from 1 to 2; however, there were no significant changes when it comes to the implementation of measures to improve integrity and the fight against corruption within the civil service system. There are still large differences in perception between CSO representatives and civil servants regarding the effectiveness and impartiality of these measures. Additionally, it is notable that although a third of civil servants see these measures as effective and impartial, a large proportion believe they would not be protected as whistleblowers.

■ How does Serbia do in regional terms?

Chart 25: Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service



The regional PAR Monitor report, with results for all WB administrations is available at: www.par-monitor.org

IV.5 Summary results for the Public Service and Human Resource Management area

The findings indicate that official data on the civil service system, such as the total number of civil servants and the number of civil servants per administrative body, are still unavailable. Authorities responsible for preparing reports on various aspects of the civil service do not regularly publish them on their websites. On the other hand, the National Academy for Public Administration and the HRMS actively promote data from their jurisdiction online, that is, on professional development of civil servants and current job vacancies.

Also, no progress has been recorded regarding the most important aspects of temporary employment (fixed-term employment, service contracts, etc.). Procedures for such types of engagements are insufficiently transparent, and there are no clearly defined limits of contract duration for all forms of temporary engagements. The results of the survey of civil servants indicate that they still believe that temporary employment in the civil service is a rule, not an exception.

Regarding public competitions for jobs in the civil service, progress was made in terms of public announcements of competitions, as well as the possibility for candidates to receive additional clarifications during the application process through the "Candidates' Corner", which is managed by the HRMS. Although the administrative burden has been reduced, the obligation to pass a state exam for candidates applying to senior civil servant positions still represents an obstacle for new candidates. Finally, there is no possibility to supplement incomplete documentation, and information about unsuccessful competitions is unavailable to the general public.

Protection of senior civil servants from unwanted political influence remains very low. Clear criteria are prescribed for the dismissal of senior civil servants and there is a legal obligation to appoint acting senior civil servants from within the civil service. However, the practice of excessive appointment of acting senior civil servants remains the issue, along with the continuous violation of the provisions limiting the maximum period during for being in such status. Additionally, less than a third of civil servants believe their colleagues in senior positions could refuse illegal orders from their superiors without jeopardising their careers.

The remuneration system is mostly simply structured and clearly defines the options for supplements to the basic salary. However, transparency is still not at a satisfactory level. In particular, the problem is reflected in the lack of publicly available information on the salaries of civil servants, apart from basic information contained in the Law on Salaries of Civil Servants and General Employees and annual budget laws.

Finally, the legal framework defines measures to improve integrity and fight against corruption in the civil service system, but their inadequate implementation remains the issue. Additionally, there are still large differences in perception between representatives of CSOs and civil servants on the effectiveness and impartiality of these measures, with CSOs expressing complete mistrust in the prescribed measures. Besides, it is notable that although a third of civil servants consider these measures effective and impartial, a large percentage of them think they would not be protected as whistleblowers.

IV.6 Recommendations for Public Service and Human Resource Management

Tracking recommendations from PAR Monitor 2019/2020

Colour coding scheme for tracking recommendations

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Recommendations	Status	Comment
1. The Government should ensure full interoperability of the HRM information system (the Central Personnel Registry - CPR) with other relevant systems, such as the payroll system, thus ensuring full reliability of the data contained therein. Failure to input the data into the CPR can result in automatic failure to disburse the salary/remuneration to individuals, which would create internal pressure in the system to keep the data updated.	Initiated	In the Report on the Implementation of the PAR Strategy for 2021, it is stated that the full operability of this system has not yet been established due to the errors observed in its functioning. ¹⁷¹
2. The Government should enact a special Regulation on the CPR. The Regulation should explicitly prescribe the contents of the Registry, frequency, and methods of updating it, its management and monitoring, as well as methods to verify accuracy of data and measures for bodies that do not comply with the CSL and the Regulation (who do not provide the data in the registry).	No action taken	Although the Law on Civil Servants stipulates the obligation to adopt the Regulation on CPR, such regulation has not been adopted at the time of writing this report.
3. The MPALSG and the HRMS should regularly publish statistical data on the civil service and make it available in open data format. The data on the number of civil servants should at least be broken down by basic ranks/functions and by institutions. Such datasets should also be published at the central Open Data Portal, available for download and reuse free of charge.	No action taken	MPALSG does not publish relevant statistical data through the open data portal, nor does the HRMS. None of these institutions have a section on their website or a separate report with relevant statistical data.

¹⁷¹ Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the PAR Strategy for 2021-2030, p. 31.

<p>4. The HRMS, NAPA and the Ministry of Finance should produce and publish comprehensive annual reports on the civil service from areas within their competence that are currently either not being produced or not being published. Those include planning and recruitment, performance appraisal, career development, and remuneration policy. In addition to quantitative elements, the reports should contain outcome-oriented components that would address the quality of work of the civil service and assessments of its professionalisation and depoliticisation.</p>	<p>Partially implemented</p>	<p>During the monitoring cycle, it was established that there are publicly available reports on compliance with the Code of conduct of civil servants and on civil servants' professional development. Still, these reports only include general assessments of the quality and outcomes of these measures and trainings. Reports on other key aspects of the civil service system are not publicly available.</p>
<p>5. The Government, HRMS and MPALSG should intensify activity on promoting reports and data on civil service through the most popular nation-wide means, including webpages, social media, press releases and media statements. Such promotion can contribute to an improved public image of the state administration, increased transparency, and trust, as well as increased attraction of potential high-quality candidates for work in the state administration.</p>	<p>Partially implemented</p>	<p>MPALSG and NAPA use their websites as the main means of communication. On the other hand, the HRMS often uses social media and the Viber group, where a large amount of data is promoted daily.</p>
<p>6. The Government should make the duration limits for temporary engagements more explicit and clearer and prescribe unambiguous criteria for the selection of temporary staff in the state administration. Duration of all forms of temporary engagement contracts (a fixed-term contract under the CSL, temporary and service contracts under the Labour Law) should be legally limited to up to one year and there should be clear and transparent criteria for possible renewal of such contacts after the expiry of the one-year period. Criteria for temporary employment should contain requirements and/or competences which are equal or similar to those required for civil servants performing tasks (jobs) of similar complexity.</p>	<p>Partially implemented</p>	<p>Neither the Law on Civil Servants nor the Labor Law specified the criteria for all temporary engagements. Regarding the limitation of fixed-term employment, the Labor Law states that temporary employment contracts are not concluded for activities that last longer than 120 working days in a calendar year. However, other temporary engagement contracts, such as service contracts, do not have a legal duration limit. The Law on Civil Servants sets limits for certain fixed-term contracts, but those limits are not defined for all types of temporary engagements.¹⁷²</p>
<p>7. State administration bodies should be obliged to conduct public competitions for all types and grounds of temporary engagement in the civil service. Competencies of candidates should be examined based on clearly set criteria for temporary engagement.</p>	<p>Initiated</p>	<p>There is no obligation to conduct an internal or public competition in the case of replacing an absent civil servant, those appointed as acting civil servants, a civil servant with inactive employment status due to an internship, and for positions in the cabinet. Public competitions for temporary employment are announced in two cases - due to temporarily increased workload and for internships. The implementation of the mandatory competition procedure for hiring fixed-term employees in cases of increased workload was initially postponed from 2021 to 2023 and then until 2025, with amendments to the Law on Civil Servants from December 2022.</p>

172 Law on Civil Servants, available at: <http://bitly.ws/Afdq> and Labor Law, available at: <http://bitly.ws/B5Xo> (accessed 3 March 2023).

<p>8. State administration bodies advertising vacancies should translate the bureaucratic language of public competitions into a simpler and clearer language, include visual elements such as infographics or videos explaining the steps in the recruitment process, as well as publish a FAQ sheet clarifying the most challenging questions based on the previous practice. All subsequent questions for clarification should be made public with a corresponding answer.</p>	<p>No action taken</p>	<p>During the monitoring cycle, it was established that public competition announcements contain all the necessary information. Still, they are written in bureaucratic language with very long text. However, it should be emphasised that the HRMS creates summaries of each announcement that contains the most important information.</p>
<p>9. A passed professional state exam should not be a prerequisite but a long-term requirement for employment in the senior civil service. Alternatively, and as a minimum, taking the exam should be made free of charge, the timeframe for taking the exam should be prolonged and candidates should be offered free access to courses and tutorials to help them prepare for the exam. This would create equal conditions for external candidates and candidates applying from within the administration.</p>	<p>No action taken</p>	<p>Article 11 of the Regulation on internal and public competition for filling positions in state institutions states that passing the state exam is not a requirement for employment. However, this article further states that persons participating in competitions for civil servants must submit proof of passing the exam no later than 20 days after the deadline for applying for the competition. This essentially means that they must have already passed the exam when applying, although there is no formal obligation to do so.¹⁷³</p>
<p>10. The decisions and reasoning of the ranking and selection of all participating candidates in all recruitment phases, as well as on the annulment of public competitions, should be made publicly available, with due respect for the protection of personal information, thus allowing for increased external scrutiny and creating added pressure for merit-based selection.</p>	<p>Partially implemented</p>	<p>While the Law on Civil Servants mandates that the name and surname of the selected candidate, together with the list of other candidates who applied (under their codes), should be publicly available, there is no obligation to publicly announce the explanation of decisions of selection committees. During the monitoring cycle, it was observed that institutions do not publish all relevant information for each competition procedure. When it comes to unsuccessful competitions, information and explanations of why they were unsuccessful are not published.</p>
<p>11. The Government should urgently cease the practice of appointing and reappointing acting managers and start making appointments of senior civil servants in accordance with the legal provisions.</p>	<p>No action taken</p>	<p>Personnel decisions of the Government, available online, indicate that the practice of appointing and re-appointing acting senior civil servants for a period longer than allowed by law is still common.</p>
<p>12. Appointments of senior civil servants should be exempt from the competence of the Government Personnel Commission. Appointment proposals by heads of administrative bodies for filling in the SCS vacancy should be directly forwarded for approval at the Government's sessions.</p>	<p>No action taken</p>	<p>The Rules of Procedure of the Government still allow the Personnel Commission to interfere the process of proposing appointments and dismissals within the competence of the Government.¹⁷⁴</p>

¹⁷³ Regulation on internal and public competition for filling positions in state institutions, Article 11. Available at: <http://bitly.ws/Av7l> (accessed 3 March, 2023).

¹⁷⁴ Rules of Procedure of the Government, available at: <http://bitly.ws/B65h> (accessed 3 March 2023).

<p>13. Information on the offered salary for jobs in the civil service should be part of public competition announcements that are advertised through nation-wide channels. The webpages of the MPALSG and HRMS should contain information on average total salaries per different categories of civil servants. This information should be accessible in no more than three clicks from the homepages.</p>	<p>No action taken</p>	<p>Public competition announcements still do not contain information on salaries for advertised job positions. Also, there is no information on the average total salaries for different categories of civil servants on the websites of MPALSG and HRMS.</p>
<p>14. Both websites should provide citizen-friendly explanations or visual presentations of the remuneration information. These illustrations should be easy to understand and written in non-bureaucratic language, as well as contained within three clicks from the homepages.</p>	<p>No action taken</p>	<p>Information on salaries of civil servants is not citizen friendly, i.e., it does not exist on websites of competent authorities.</p>
<p>15. Central state administration bodies should continuously promote the whistle blower protection system to their employees. This can be done through in-house awareness raising workshops across the administration, reader-friendly brochures and counselling about the possibilities given to whistle blowers, including real-life cases and examples.</p>	<p>Initiated</p>	<p>The general training programme for civil servants implemented by NAPA for 2021 and 2022 included training on the protection of whistleblowers as part of corruption prevention thematic area. However, the Training Programme for 2021 states that the planned number of participants was between 10 and 35, which is a very modest number of civil servants. The exact number of participants cannot be determined since the NAPA's annual report on the evaluation of the training programmes for 2022 did not provide the number of participants for the whistleblower protection training, but only general data for the thematic area of prevention of corruption.¹⁷⁵</p>
<p>16. In addition to enabled interoperability, the new central personnel registry should allow for generating quick reports on the relevant HRM issues, such as the annual turnover for the different staff categories/administrative bodies or division of data on civil servants by categories and administrative bodies.</p>	<p>Initiated</p>	<p>At the time of writing this report, the new Central Personnel Register was still under construction. Additionally, the Government did not adopt the regulation on CPR, and the mandatory data to be entered in the Register is prescribed only by Article 160 of the Law on Civil Servants. It should be mentioned that the HRMS manages Internal Labour Market register, which provides data on vacancies and personnel needs for state administration bodies. Employees who seek a permanent or temporary transfer can also be registered there.¹⁷⁶</p>
<p>17. In addition, the HRMS should publicly disclose any reports on the state of play and proposed measures regarding the outflow of staff, which are drafted in line with the article 7 of the Instruction on the methodology for monitoring and analysing the situation related to the outflow of staff and its impact on the work of the state administration.</p>	<p>No action taken</p>	<p>HRMS submits a report to the Government on the outflow of personnel, which contains proposals for measures that would contribute to mitigating or eliminating the consequences caused by the outflow of staff. However, these reports are not published on the HRMS website.</p>

175 NAPA, *Training Programme Evaluation Reports for 2021 and 2022*, available at: <http://bitly.ws/B67T> (accessed 3 March 2023)

176 Internal labour market, available at: <http://bitly.ws/B69S> (accessed 3 March 2023).

<p>18. State administration bodies should intensify advertising vacancies through social media channels and invest efforts in making the advertised content visually attractive and reader friendly.</p>	<p>Initiated</p>	<p>Vacancies are rarely advertised through social networks. The exception is HRMS, which regularly announces vacancies in various state administration bodies on its official Instagram and Facebook profiles and in dedicated Viber group. Also, an example of this practice can be found in the Ministry of Finance, which published in 2022 information on 16 vacant positions reserved for the best students and graduates of the Faculty of Economics. Additionally, MPALSG has announced calls for an internship program for students of universities of Novi Sad, Nis, Belgrade, Novi Pazar and Kragujevac in 2021 and 2022.</p>
<p>19. The institutions advertising vacancies should introduce search engines on their respective webpages for filtering vacancy announcements according to multiple criteria.</p>	<p>Initiated</p>	<p>Authorities generally do not have such search options on their websites. The exception is HRMS, whose page provides a search function that allows filtering vacancies by date and name of authority.</p>
<p>20. The Office for IT and eGovernment should designate a special section on the eGovernment Portal dedicated to public competitions for civil service positions. Institutions advertising public competitions should use the eGovernment Portal, in line with article 54 of the CSL. With the increased visibility of the portal in the recent year, this can improve the promotion of vacancies and contribute to higher ratio of eligible candidates.</p>	<p>Partially implemented</p>	<p>The first part of the recommendation related to the Office for IT and eGovernment has been fulfilled. A special section on the eGovernment portal is dedicated to public competitions for public sector vacancies, including state administration bodies. However, individual administration bodies did not fulfil the second part of the recommendation, which refers to advertising individual vacancies on the portal, because this section only refers to HRMS and the National Employment Service websites.¹⁷⁷</p>
<p>21. It is necessary to announce vacancies for all the positions currently in acting status. Moreover, the Government needs to complete all current competition procedures conducted by the High Civil Service Council by selecting a candidate for appointment.</p>	<p>No action taken</p>	<p>During the monitoring cycle, it was established that the Government does not implement the necessary competition procedures in order to solve the problem of excessive acting senior civil servants.</p>

¹⁷⁷ Available at: <http://bitly.ws/AATB> (accessed 3 March 2023).

PAR Monitor 2021/2022 recommendations

The PAR Monitor 2019/2020 recommendations are still relevant, so they have been repeated in this edition as well. Accordingly, no new recommendations have been defined for this monitoring cycle. Certain recommendations have been modified to a lesser extent to harmonise with the legal framework changes or for their clarification.

Repeated and modified recommendations from PAR Monitor 2019/2020

1. The Government should ensure full interoperability of the HRM information system (the Central Personnel Registry - CPR) with other relevant systems, such as the payroll system.
2. In addition to enabled interoperability, the new central personnel registry should allow for generating quick reports on the relevant HRM issues, such as the annual turnover for the different staff categories/administrative bodies or division of data on civil servants by categories and administrative bodies.
3. The Government should enact a special regulation on the CPR. The regulation should explicitly prescribe the contents of the Registry, frequency, and methods of updating it, its management and monitoring, as well as methods to verify accuracy of data and measures for bodies that do not comply with the CSL and the regulation (who do not provide the data in the registry).
4. The MPALSG and the HRMS should regularly publish statistical data on the civil service and make it available in open data format. The data on the number of civil servants should at least be broken down by basic ranks/functions and by institutions. Such datasets should also be published at the central Open Data Portal, available for download and reuse free of charge.
5. The HRMS, NAPA and the Ministry of Finance should produce and publish comprehensive annual reports on the civil service from areas within their competence that are currently either not being produced or not being published. Those include planning and recruitment, performance appraisal, career development, and remuneration policy. In addition to quantitative elements, the reports should contain outcome-oriented components that would address the quality of work of the civil service and assessments of its professionalisation and depoliticisation.
6. The Government, HRMS and MPALSG should intensify activity on promoting reports and data on civil service through the most popular nation-wide means, including webpages, social media, press releases and media statements. Such promotion can contribute to an improved public image of the state administration, increased transparency, and trust, as well as increased attraction of potential high-quality candidates for work in the state administration.
7. The Government should make the duration limits for temporary engagements more explicit and clearer and prescribe unambiguous criteria for the selection of temporary staff in the state administration. The duration of all forms of temporary engagement contracts (a fixed-term contract under the CSL, temporary and service contracts under the Labour Law) should be legally limited to up to one year and there should be clear and transparent criteria for possible renewal of such contacts after the expiry of the one-year period. Criteria for temporary employment should contain requirements and/or competences which are equal or similar to those required for civil servants performing tasks (jobs) of similar complexity.
8. State administration bodies should be obliged to conduct public competitions for all types and grounds of temporary engagement in the civil service. Competencies of candidates should be examined based on clearly set criteria for temporary engagement.
9. State administration bodies advertising vacancies should translate the bureaucratic language of public competitions into a simpler and clearer language, include visual elements such as infographics or videos explaining the steps in the recruitment process, as well as publish a FAQ sheet clarifying the most challenging questions based on the previous practice. All subsequent questions for clarification should be made public with a corresponding answer.

10. The institutions advertising vacancies should introduce search engines on their respective webpages for filtering vacancy announcements according to multiple criteria.
11. State administration bodies should intensify advertising vacancies through social media channels and invest efforts in making the advertised content visually attractive and reader friendly.
12. Institutions advertising public competitions should use the eGovernment Portal, in line with article 54 of the CSL. With the increased visibility of the portal in the recent year, this can improve the promotion of vacancies and contribute to higher ratio of eligible candidates.
13. A passed professional state exam should not be a prerequisite but a long-term requirement for employment in the senior civil service. Alternatively, and as a minimum, taking the exam should be made free of charge, the timeframe for taking the exam should be prolonged and candidates should be offered free access to courses and tutorials to help them prepare for the exam. This would create equal conditions for external candidates and candidates applying from within the administration.
14. The decisions and reasoning of the ranking and selection of all participating candidates in all recruitment phases, as well as on the annulment of public competitions, should be made publicly available, with due respect for the protection of personal information, thus allowing for increased external scrutiny and creating added pressure for merit-based selection.
15. The Government should urgently cease the practice of appointing and reappointing acting managers and start making appointments of senior civil servants in accordance with the legal provisions.
16. It is necessary to announce vacancies for all the positions currently in acting status. Moreover, the Government needs to complete all current competition procedures conducted by the High Civil Service Council by selecting a candidate for appointment.
17. Appointments of senior civil servants should be exempt from the competence of the Government Personnel Commission. Appointment proposals by heads of administrative bodies for filling in the SCS vacancy should be directly forwarded for approval at the Government's sessions.
18. Information on the offered salary for jobs in the civil service should be part of public competition announcements that are advertised through nation-wide channels.
19. The webpages of the MPALSG and HRMS should contain information on average total salaries per different categories of civil servants. Both websites should provide citizen-friendly explanations or visual presentations of salary information.
20. In addition, the HRMS should publicly disclose any reports on the state of play and proposed measures regarding the outflow of staff, which are drafted in line with the article 7 of the Instruction on the methodology for monitoring and analysing the situation related to the outflow of staff and its impact on the work of the state administration.
21. Central state administration bodies should continuously promote the whistle blower protection system to their employees. This can be done through in-house awareness raising workshops across the administration, reader-friendly brochures and counselling about the possibilities given to whistle blowers, including real-life cases and examples.

V. ACCOUNTABILITY



V.1 WeBER indicators used in Accountability and country values for Serbia

ACC_P2_I1: Civil society perception of the quality of legislation and practice of access to public information



ACC_P2_I2: Proactive informing of the public, by public authorities



V.2 State of play in Accountability and main developments since 2020

The main changes in this area relate to the amendments to the Law on Free Access to Information of Public Importance, which were adopted in November 2021 and entered into force in February 2022.¹⁷⁸ The adoption of these amendments has been continuously delayed since 2016, when the first initiative to amend the law was launched by the Ministry of Public Administration and Local Self-Government.¹⁷⁹ The European Commission stated that adopting the amendments led to further harmonisation of the domestic legal framework in this area with international standards.¹⁸⁰ When it comes to the global positioning of Serbia in the area of the right to access information of public importance, the *Global Right to Information Rating* places Serbia in third place out of 135 countries in 2022, with a score of 135 out of 150, which is the same positioning as in 2020 and 2021.¹⁸¹

Amendments to the Law expanded and further specified the list of public authorities obliged to provide free access to information of public importance from their work.¹⁸² On the other hand, the list of institutions whose decisions cannot be appealed has been expanded to include the National Bank of Serbia.¹⁸³ The text of the Proposal of the Law amendments explains that this decision is in accordance with the standards of independence of central banks established by the regulations of the European Union, especially functional independence, which implies that only independent judicial bodies can review the decisions of the central bank.¹⁸⁴ In addition, the abuse of freedom of information rights will no longer be provided as a basis for refusing to act upon a request, as this provision of the previous version of the Law has frequently been used in the past as an excuse not to provide the requested information.¹⁸⁵ A novelty has also been introduced in the procedure for the selection of the Commissioner for Information of Public Importance and Personal Data Protection (hereinafter: the Commissioner), which now requires the President of the National Assembly to announce a public competition.¹⁸⁶ It is important to point out that the Law expanded the jurisdiction of the Commissioner, authorising him to impose fines, which can be imposed several times and are enforced through the courts. In addition, the Commissioner is empowered to submit a request to initiate misdemeanour proceedings for the misdemeanours provided for in this Law.¹⁸⁷

178 Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021. Available at: <http://bitly.ws/AC7A> (accessed 20 April 2023)

179 The first initiative to amend the Law was launched in 2016 without results and was renewed in 2018. Finally, the changes were adopted in 2021.

180 European Commission, Serbia 2022 Report, p. 33. Available at: <http://bitly.ws/zxzQ> (accessed 20 April 2023)

181 The global rating does not include an assessment of the amended Law on Free Access to Information of Public Importance, the assessment was based on the text of the previously valid law. Available at: <http://bitly.ws/DhPL> (accessed 20 April 2023)

182 Article 3, Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021.

183 Ibid, Article 22.

184 Law on Amendments to the Law on Free Access to Information of Public Importance, p. 23. Available at: <http://bitly.ws/DhRt> (accessed 20 April 2023)

185 Ibid, p. 20.

186 Ibid, p. 7.

187 Article 28a and 28b, Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021.

On the other hand, in the Annual Report for 2021 on the implementation of the PAR Strategy, the lack of mechanisms for implementing sanctions in cases of non-compliance with the Commissioner's decisions is cited as an issue that has yet to be resolved.¹⁸⁸ The administrative inspection also "did not submit any request to the misdemeanour courts to initiate proceedings for non-execution of the Commissioner's decision".¹⁸⁹ In 2021, the rate of execution of the Commissioner's decisions was 75%, which, compared to 2020, when it was 74%, does not show progress on this matter, but the amendments to the Law had not yet entered into force in this period.¹⁹⁰ However, according to the EC's assessment, visible progress has been made regarding public authorities' obligation to submit reports to the Commissioner. In 2021, the number of reports submitted by authorities at the national level increased by 34%, and those at the local level increased by 21,6%.¹⁹¹

In addition, Article 39 of the Law stipulates the obligation of public authorities to prepare an Information booklet and specifies the information it must contain.¹⁹² Compared to the previous legal requirements, the amended legal framework requires some additional information, such as data on services provided by authorities to the public, public procurement, a list of strategies, programmes, plans and reports adopted by authorities and those in the drafting process, data on performed inspections and audits of the organisation's operations, financial data, etc.¹⁹³ If an authority does not prepare and update the Information Booklet, the Commissioner is, in accordance with the Law amendments, authorised to submit a request for initiation of misdemeanour proceedings.¹⁹⁴ In February 2022, the Office of the Commissioner introduced the Unified Information System of Information Booklets of public authorities, which enables easier search and processing of information, analysis and comparison.¹⁹⁵ Public authorities were obliged to publish their information booklets through the system by November 17, 2022.¹⁹⁶ More than 5,000 authorities fulfilled their obligations within the specified period, while for others, the publication process was ongoing.¹⁹⁷

In its latest report, SIGMA assessed that there is a lack of proactive publication of information of public importance and that it is necessary to develop a culture of transparency in individual institutions, but that the level of transparency of government bodies as a whole is satisfactory.¹⁹⁸ After SIGMA's report was released, the Unified Information System of Information Booklets of public authorities began operating, and the amount of data published through the Open Data Portal has also increased. The number of state administration bodies and other public authorities that share/publish open data on the Portal increased from 45 in 2019 to 83 in 2021, and 1,568 data sets were published, i.e., four times more than in 2020.¹⁹⁹ Still, during the monitoring period, no amendments regarding closer conditions for the creation and maintenance of authorities web presentation were adopted to the Regulation, which could be significant for proactive public informing.

188 Ministry of Public Administration and Local Self-Government, *Annual Report for the year 2021 on the implementation of the PAR Strategy for 2021 - 2030*, p. 53. Available at: <http://bitly.ws/B77R> (accessed 20 April 2023)

189 European Commission, *Serbia 2022 Report*, p. 30.

190 European Commission, *Serbia 2021 Report*, p. 38, available at: <http://bitly.ws/B78d> (accessed 21 April 2023) and European Commission, *Serbia 2022 Report*, p. 30.

191 European Commission, *Serbia 2022 Report*, p. 30.

192 Article 39, Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021.

193 Instructions for the preparation and publication of Information Booklets of public authorities, Official Gazette no. 10/2022. Available at: <http://bitly.ws/DkXQ> (accessed 21 April 2023)

194 Article 39, Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021.

195 Ministry of Public Administration and Local Self-Government, *Annual Report for the year 2021 on the implementation of the PAR Strategy 2021 - 2030*, p. 50. The Booklets are available at: <http://bitly.ws/B78M> (accessed 21 April 2023)

196 Article 31, Instructions for the preparation and publication of Information Booklets of public authorities, Official Gazette no. 10/2022.

197 See more at: <http://bitly.ws/HJJB> (accessed 21 April 2023)

198 SIGMA, *Monitoring Report for Serbia*, 2021, p. 98. Available at: <http://bitly.ws/zxEK> (accessed 21 April 2023)

199 Ministry of Public Administration and Local Self-Government, *Annual Report for the year 2021 on the implementation of the PAR Strategy 2021 - 2030*, p. 51. The open data portal is available at: <https://data.gov.rs/sr/> (accessed April 21, 2023)

V.3 What does WeBER monitor and how?

The SIGMA principle covering the right to access public information is the only principle presently monitored in the area of accountability. 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 is consistently applied in practice.

This Principle bears utmost significance in increasing the transparency of administrations and holding them accountable by civil society and citizens, as well as in safeguarding the right-to-know by the general public. 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 administrative bodies. On one hand, monitoring approach considers the experience of members of civil society with enforcement of the legislation on access to public information is observed, and on the other, it is based on the direct analysis of the websites of administration bodies.

WeBER's 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 civil society organisations in the Western Balkans was implemented using an online surveying platform from the end of March to the end of June 2022.²⁰⁰ The 28-question questionnaire was used to assess all Western Balkans 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 encompassed as wide a range of organisations as possible in terms of types, geographical distributions, and activity areas, thereby contributing 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 the proactive informing of the public by administrative 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.²⁰¹ 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.

²⁰⁰ The survey of CSOs was administered through an anonymous, online questionnaire. The data collection method included CASI (computer-assisted self-interviewing). In Serbia, the survey was conducted in the period from March 28th to June 23rd, 2022. The data collection method included CASI (computer-assisted self-interviewing). The survey sample was N=150.

²⁰¹ 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.4 WeBER monitoring results

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

Table 18: Civil society perception of the quality of legislation and practice of access to public information

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
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	0/4	0/4	0/4
E2. CSOs consider exceptions to the presumption of public character of information to be adequately defined	0/2	0/2	0/2
E3. CSOs consider exceptions to the presumption of public character of information to be adequately applied	0/4	0/4	0/4
E4. CSOs confirm that information is provided in the requested format	1/2	1/2	1/2
E5. CSOs confirm that information is provided within prescribed deadlines	1/2	1/2	1/2
E6. CSOs confirm that information is provided free of charge	2/2	2/2	2/2
E7. CSOs confirm that the person requesting access is not obliged to provide reasons for requests for public information	1/2	1/2	1/2
E8. CSOs confirm that in practice the non-classified portions of otherwise classified materials are released	0/4	0/4	0/4
E9. CSOs consider that requested information is released without portions containing personal data	1/2	1/2	1/2
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	0/2	0/2	0/2
E11. CSOs consider that the designated supervisory body has through its practice, set sufficiently high standards of the right to access public information	2/4	2/4	4/4
E12. CSOs consider the soft measures issued by the supervisory authority to public authorities to be effective	0/2	0/2	1/2
E13. CSOs consider that the supervisory authority's power to impose sanctions leads to sufficiently grave consequences for the responsible persons in the noncompliant authority	0/2	0/2	0/2
Total score	8/34	8/34	11/34
Indicator value (scale 0-5)²⁰²	1	1	1

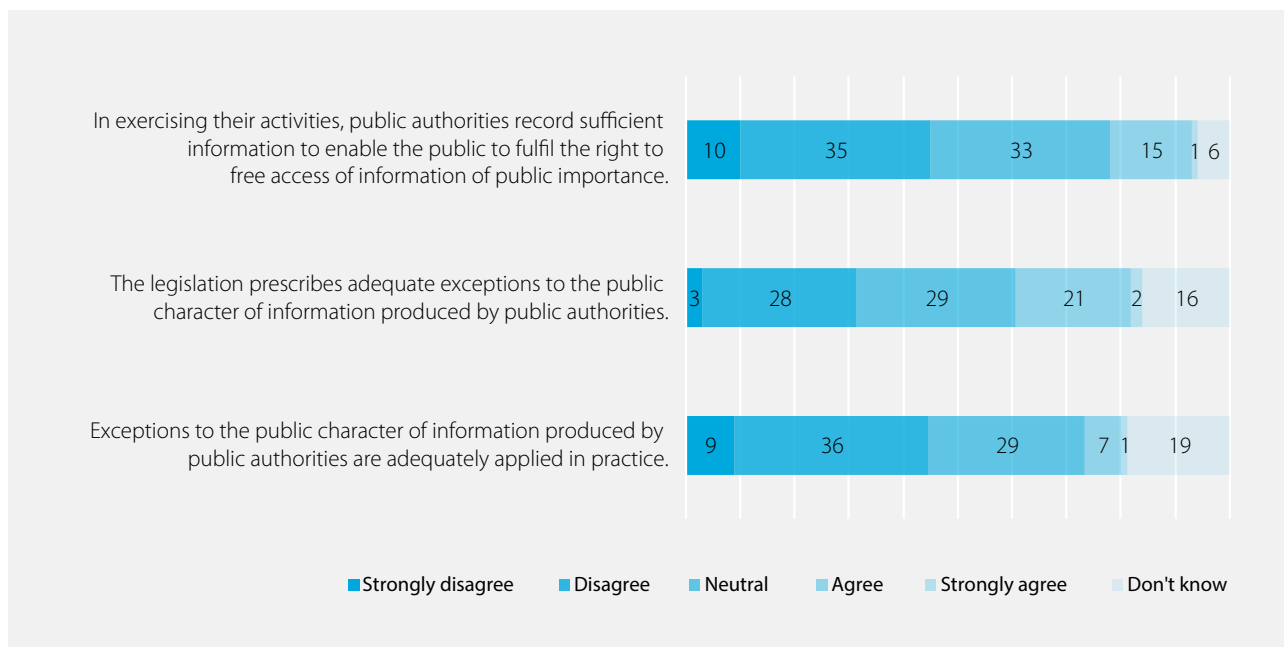
The CSO perception survey results show no progress compared to the previous monitoring cycle regarding the quality of legislation and access to information of public importance. It should be emphasised that the survey of CSOs was conducted from March to June 2022, just a few months after the amended Law on Free Access to Information of Public Importance, adopted in December 2021, came into force and whose most important changes were analysed in the first part of this chapter. Accordingly, an assessment of the new legislative framework, and its impact on improving the practice is expected in the near future.

Civil society representatives are still sceptical about whether public authorities record sufficient information about their work necessary to exercise the right to access information, with as many as 45% of respondents

²⁰² 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.

believing that this prerequisite is not met. Additionally, only 23% of respondents believe that exceptions to the assumption of the public character of information are adequately defined. Approximately 8% believe such exceptions are adequately applied in practice.

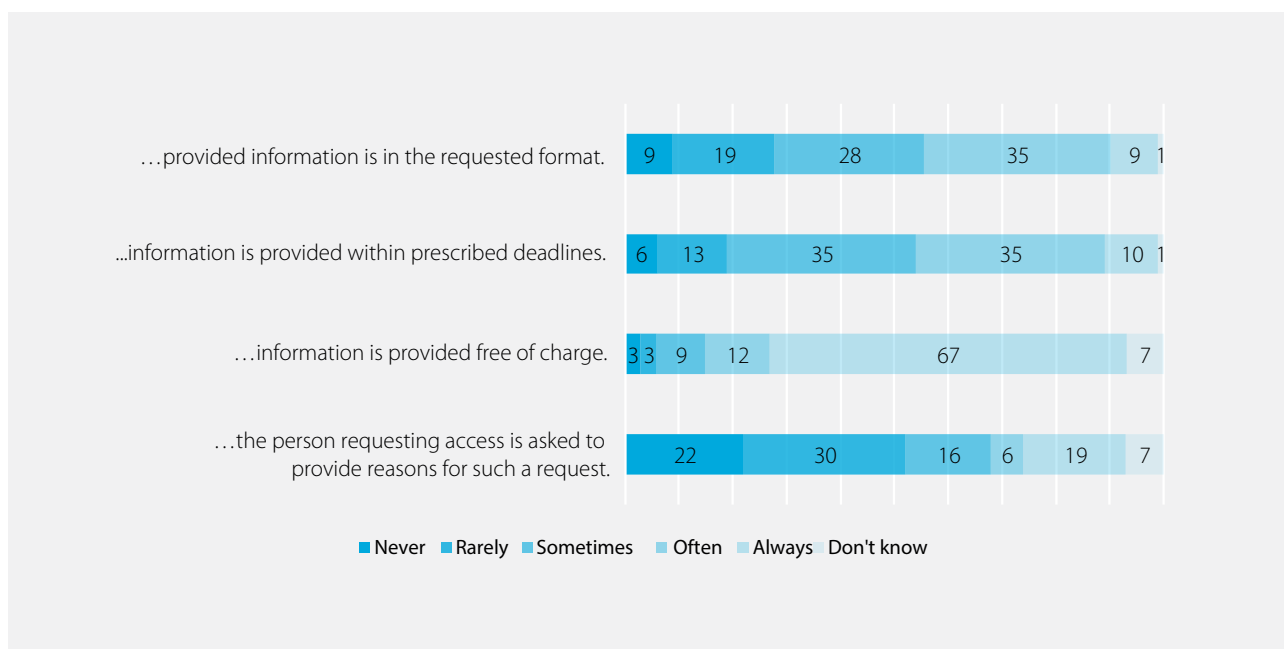
Chart 26: Based on your organisation's experience with exercising the right to free access to information, indicate the level of agreement to the following statements (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=129 respondents.

The perception is somewhat better regarding the actual delivery of information. Namely, 44% of the CSOs that have sent requests for access to information of public importance in the previous two years confirm that the information was always or often delivered to them in the requested format, and 45% confirm that it was delivered within the legally prescribed deadline. In addition, 78% of respondents claim that the requested information is often or always provided free of charge. On the other hand, despite the majority of respondents confirming that they are not required to provide reasons for submitting requests for access to information, as many as 41% of them confirmed that this still happens (sometimes, often or always). Given that both the previous and amended legal framework governing the right to access information stipulated that the information seeker does not have to explain the reasons for seeking information, the high percentage of respondents confirming that this practice still exists causes concern. In addition, a high share of CSO representatives (45%) confirmed in the previous monitoring cycle that the authorities require explanations for access to information, which signifies a continuous problem in practice.

Chart 27: When my organisation requests free access to information... (%)



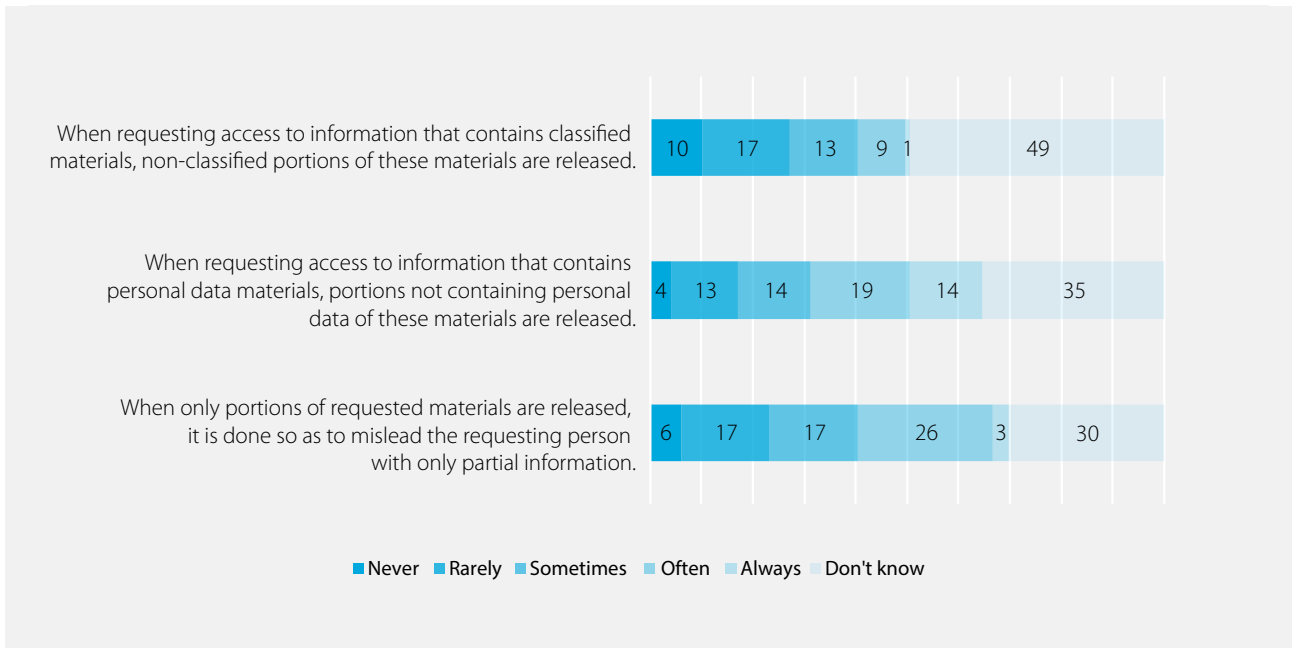
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

Regarding information of public importance that contains data labelled as confidential, only 10% of the interviewed CSO representatives confirmed that, in practice, parts of confidential materials that are not labelled as confidential are delivered. Although Article 12 of the Law obliges authorities to provide information seekers with access to the part of the document that contains non-classified information and inform them that the rest is unavailable, the survey results suggest that this is not the case in practice.²⁰³ The perception is somewhat more positive when it comes to the protection of personal data, where a third of respondents confirmed that the requested information is delivered to them without parts containing such data. When parts of the material are omitted due to confidentiality marks, 29% of respondents believe that this is done in order to mislead information seekers by providing partial information, while 23% of them believe that this never or rarely happens. Interestingly, for all three mentioned questions, a high share of respondents chose the option “don't know” (30 - 49%), which indicates, as in previous monitoring cycles, a lack of experience among the respondents on these matters.²⁰⁴

²⁰³ Article 12, Law on Free Access to Information of Public Importance, Official Gazette no. 120/2004, 54/2007, 104/2009, 36/2010, 105/2021.

²⁰⁴ The answers to these questions were given by CSO representatives who confirmed in the previous question that in the previous two years they had sent a request for access to information of public importance.

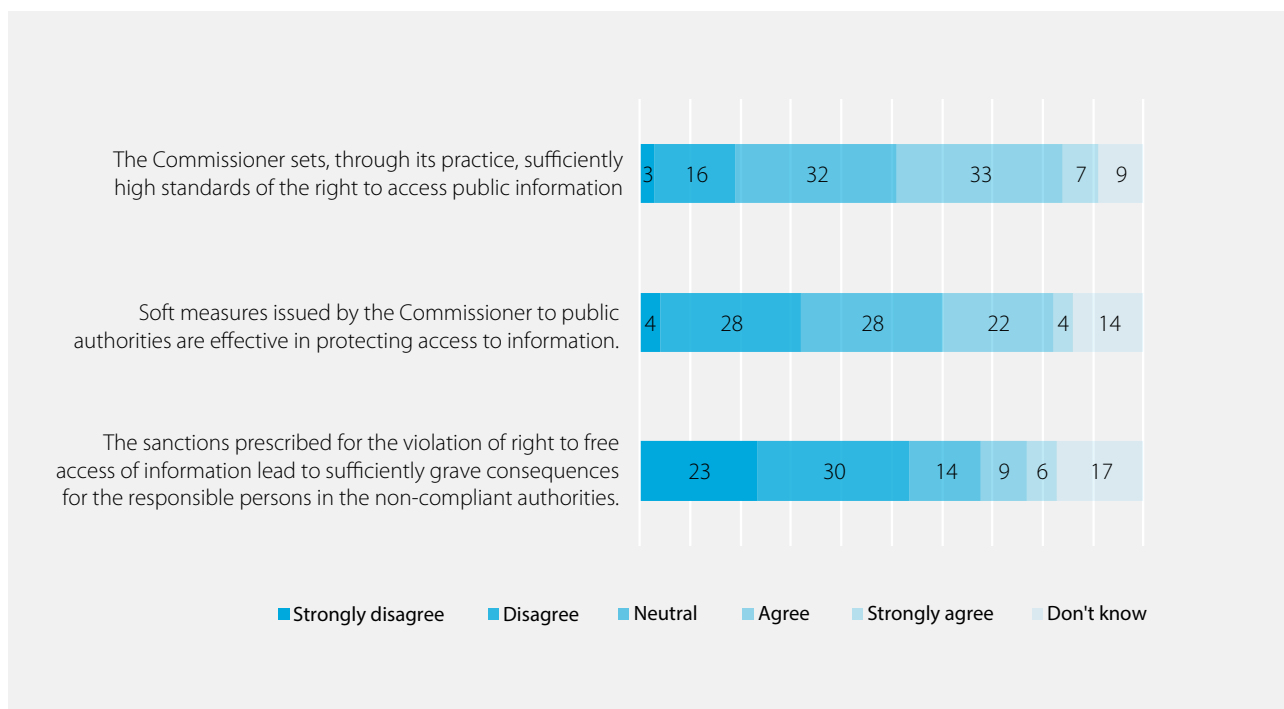
Chart 28: Perception of civil society on access to information containing confidential or personal data (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

Finally, regarding CSOs’ perception of various aspects of the Commissioner’s work, approximately 41% of them agree or strongly agree that the standards set by the Commissioner are high enough to protect free access to information, which represents a drop of four percentage points compared to the previous monitoring cycle. On the other hand, the perception of the effectiveness of measures that the Commissioner has at his disposition in protecting free access to information remained unchanged compared to the PAR Monitor 2019/2020, meaning slightly more than a quarter of the respondents consider these measures to be effective (26%). Overall dissatisfaction with the ability of the Commissioner to consistently exercise his duties is also reflected in the low percentage of those who agreed that the prescribed sanctions for violating the right to access information lead to sufficiently grave consequences for responsible individuals in institutions that deny citizens this right. Only 15% of respondents agree or strongly agree with this statement, compared to 16% of respondents in the previous cycle. This result suggests that there was no progress compared to the previous monitoring cycle, considering that the percentage of those who agree or strongly agree with the statement remained almost unchanged.

Chart 29: Perception of civil society on the effectiveness of the supervisory role of the Commissioner (%)

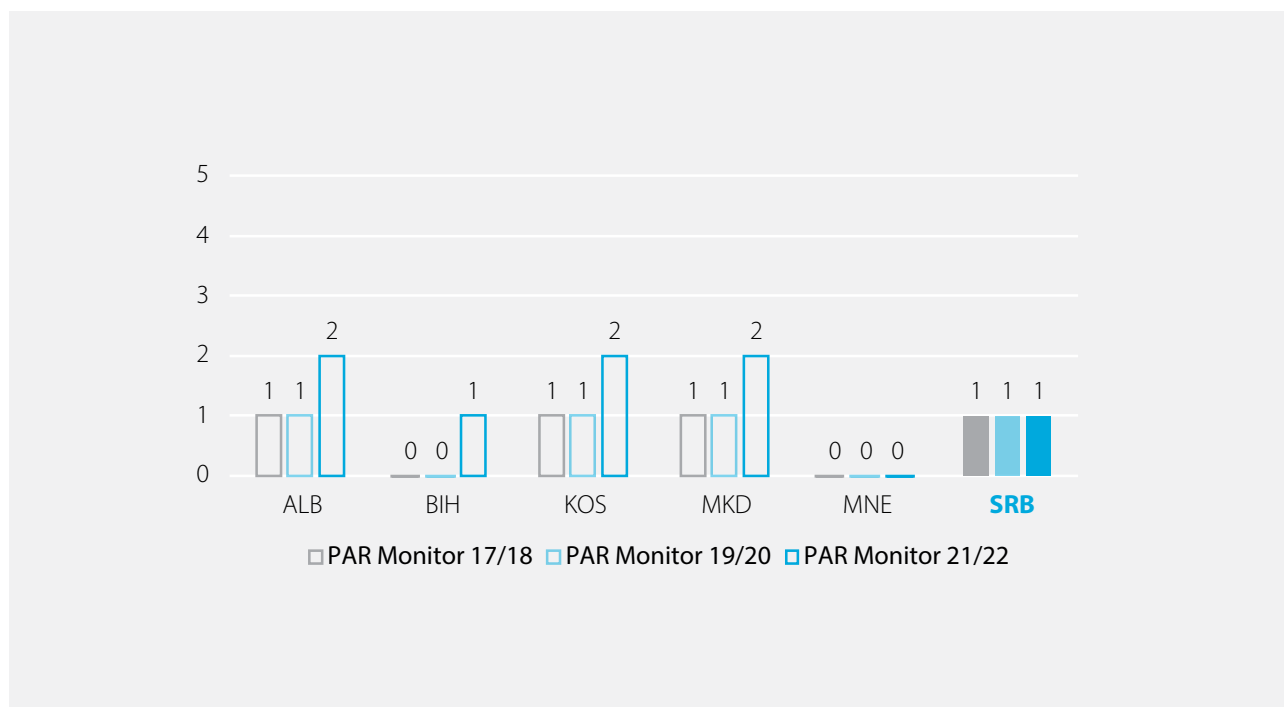


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

Civil society's perception of the quality of legislation and the practice of access to information of public importance remained mostly unchanged compared to the findings of the PAR Monitor 2019/2020, so the value of this indicator is still 1. Although the amendments to the Law on Free Access to Information of Public Importance were adopted in December 2021, CSOs' perception suggests that the amended framework did not contribute to the improvement of practice in the first months of implementation. CSOs are still extremely sceptical about the ability of the Commissioner to implement his competencies in practice, that is, to ensure high standards of protection of the right to free access to information. Only 15% of respondents believe that the punitive measures that the Commissioner can prescribe are effective.

■ How does Serbia do in regional terms?

Chart 30: Civil society perception of the quality of legislation and practice of access to public information



Regional PAR Monitor report with results for all WB administrations is available at: www.par-monitor.org

Table 19: Proactive informing of the public, by public authorities

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Websites of public authorities contain complete and up to date information on scope of work	2/4	4/4	4/4
E2. Websites of public authorities contain easily accessible and citizen-friendly information on scope of work	1/2	0/2	1/2
E3. Websites of public authorities contain complete and up to date information on accountability (who they are responsible to)	2/4	4/4	4/4
E4. Websites of public authorities contain complete and up to date information on relevant policy documents and legal acts	4/4	0/4	4/4
E5. Websites of public authorities contain accessible and citizen friendly information on relevant policy documents and legal acts	0/2	0/2	1/2
E6. Websites of public authorities contain complete and up to date information on policy papers, studies and analyses relevant to policies under competence	2/4	0/4	2/4
E7. Websites of public authorities contain accessible and citizen-friendly information on policy papers, studies and analyses relevant to policies under competence	0/2	0/2	0/2
E8. Websites of public authorities contain complete and up to date annual reports	0/4	0/4	0/4
E9. Websites of public authorities contain accessible and citizen-friendly annual reports	0/2	0/2	0/2
E10. Websites of public authorities contain complete and up to date information on the institution's budget	0/4	2/4	4/4

E11. Websites of public authorities contain accessible and citizen-friendly information on the institution's budget	0/2	0/2	0/2
E12. Websites of public authorities contain complete and up to date contact information	2/4	2/4	4/4
E13. Websites of public authorities contain accessible and citizen-friendly contact information	2/2	2/2	2/2
E14. Websites of public authorities contain complete and up to date organisational charts which include entire organisational structure	2/4	2/4	4/4
E15. Websites of public authorities contain accessible and citizen-friendly organisational charts which include entire organisational structure	1/2	2/2	2/2
E16. 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	0/4	2/4	0/4
E17. 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	0/2	1/2	0/2
E18. Public authorities proactively pursue open data policy	0/4	0/4	0/4
Total score	18/56	23/56	32/56
Indicator value (scale 0-5)²⁰⁵	1	2	3

The findings reflect the situation in January 2022, when the analysis of authorities' websites was carried out in this monitoring cycle. The analysis includes a sample of seven state administration bodies (Table X), and all elements of this indicator, except for elements 3 and 18, are evaluated based on four criteria – whether the information is complete, up-to-date, accessible (measured by the number of clicks required for access) and citizen-friendly.

Table 20: Sample of public authorities in Serbia for the 2021/2022 monitoring cycle

Line Ministry (large)	Line Ministry (medium)	Line Ministry (small)	Ministry (horizontal)	Body of the centre of the Government	Subordinate body	Service delivery body
Ministry of Economy	Ministry of Human and Minority Rights and Social Dialogue	Ministry of Family Care and Demography	Ministry of Finance	Republic Secretariat for Legislation	Directorate for Agrarian Payments	National Employment Service

Compared to PAR Monitor 2019/2020, the sample of selected public authorities in this monitoring cycle received an overall lower result when it comes to the proactive informing of the public. The Ministry of Family Care and Demography was the least proactive institution in the selected sample.

205 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.

Two of the seven observed authorities - the Ministry of Economy and the Ministry of Family Care and Demography - did not disclose online complete and updated information about their scope of work, which led to a decrease in the score of this element. In addition, lower results compared to the previous cycle were recorded regarding information on lines of responsibility (who the authorities are responsible to). The reason for this is the non-disclosure of this piece of information by the Ministry of Family Care and Demography. On the other hand, the provision of information on the scope of work has been improved by other criteria. In the case of all analysed authorities, except for the Ministry of Family Care and Demography, this information was accessible. For four of them, it was adapted to citizens - the Ministry of Economy, Ministry of Human and Minority Rights and Social Dialogue, Directorate for Agrarian Payments and the National Employment Service (NES).

A significant improvement was also noted when it comes to making public policy documents and regulations publicly available. The presentation of these acts was marked as complete in the entire sample, and their updated versions were also published, except in the case of the Republic Secretariat for Legislation (RSL). Additionally, five of seven authorities have complete and updated information on studies and analysis relevant to public policies within their jurisdiction, the exceptions being the Ministry of Family Care and Demography and the RSL. Information on relevant public policy documents and regulations, as well as studies and analysis, are not citizen-friendly but are made easily accessible by all authorities except, once again, the Ministry of Family Care and Demography and RSL.

No progress was recorded regarding the publication of annual work reports, budget plans, and reports. The NES is the only institution that publishes complete and updated annual reports on its website, which are available for the previous 12 years and are easily accessible. In addition, a slightly lower score compared to the previous cycle was recorded regarding the transparency of the institutions' budget. Of the seven observed authorities, only three of them - the Ministry of Human and Minority Rights and Social Dialogue, the MoF, and the NES - disclose complete and updated information about budgets, which can also be easily accessed on their websites. However, only in the case of the NES is this information citizen-friendly.²⁰⁶ The decline in the element's score related to providing complete and up-to-date budget documents has been constant since the initial PAR Monitor report 2017/2018, which speaks of essential non-transparency of public authorities, especially considering the almost non-existent practice of publishing annual reports. The unavailability of such documents makes it impossible to have consistent insight into how public authorities operate and spend public funds, thus significantly reducing the possibility of holding them accountable for their work.

Except for the Ministry of Family Care and Demography, all authorities from the sample maintain complete contact information and meet other requirements on their websites. This contact information was not updated in the case of the Ministry of Finance.²⁰⁷ The organisational structure was also unavailable for the Ministry of Family Care and Demography, while for the MoF, it was not possible to determine whether it was updated.²⁰⁸ Nevertheless, organisational structures available on the websites of sampled public authorities during the monitoring were assessed as accessible and citizen-friendly.

When it came to contact points for cooperation with civil society, analysis of the sample from this cycle produced a lower result than the one from the previous report. Namely, only three institutions (Ministry of Economy, Ministry of Finance, and Ministry of Human and Minority Rights and Social Dialogue) had complete and updated contact points on their websites.²⁰⁹ Available information on cooperation with civil society was only assessed as accessible and citizen-friendly on the websites of the NES, MoF and the Ministry of Human and Minority Rights and Social Dialogue, which was also a lower result compared to the previous period.

206 Budget information can be accessed at: <http://bitly.ws/EnVC> and <http://bitly.ws/B75u> (accessed 11 May 2023)

207 The up-to-dateness of the information was assessed by contacting the institutions via email addresses or phone numbers that were available in the contact section of their website.

208 The up-to-dateness of organisational structures was checked with the help of requests for free access to information of public importance, which were sent to institutions in January 2022. Representatives of the Ministry of Finance did not respond to the sent request.

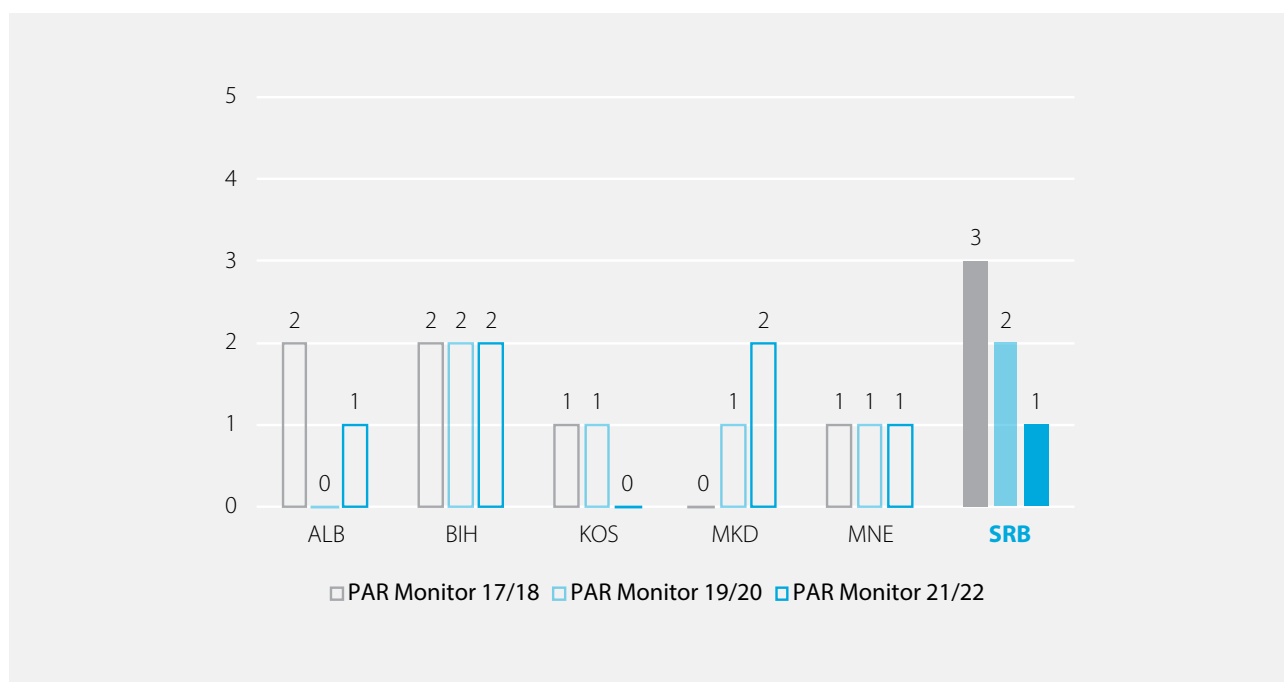
209 The up-to-dateness of the information was assessed by contacting the institutions via e-mail addresses or phone numbers that were available in the given section of their website.

Finally, the open data policy has not improved since the PAR Monitor 2019/2020.²¹⁰ Only the Ministry of Economy keeps data on the number of employed persons in an open format, while the Directorate for Agrarian Payments refers to the Open Data Portal on its website, where data on agricultural holdings can be found.

Compared to the PAR Monitor 2019/2020, the final value of the indicator reflecting proactive informing of the public has dropped to 1. However, improvements were recorded in certain aspects, such as the accessibility of information about the authorities' scope of work and their citizen-friendliness. Additionally, the websites of most sampled authorities include complete and updated information on relevant public policy documents and regulations, as well as policy studies and analysis within their jurisdiction. On the other hand, a smaller share of public authorities observed in this cycle publish budget reports, and only one has complete and updated annual reports, suggesting that their work is largely non-transparent and does not allow the public to gain essential insight into their operation. Overall, the findings indicate that the practice of proactive informing remains highly uneven in terms of type of information published and their presentation. The observed sample of public authorities also showed that there is still insufficient effort to make available information accessible and citizen-friendly.

■ How does Serbia do in regional terms?

Chart 31: Proactive informing of the public, by public authorities



The regional PAR Monitor report with results for all WB administrations is available at: www.par-monitor.org

²¹⁰ This element is evaluated based on two aspects: the availability of at least one set of open data within the jurisdiction of the authority and the availability of one set of data relevant from the aspect of free access to information (such as lists of employees and officials and data on their salaries, regulations on internal organisation, public procurement plan, financial plan, etc). If data sets are published on the Open Data Portal, the methodology also requires a reference or link to the Portal on the authority's website.

V.5 Summary of results in the Accountability area

In the area of accountability, the perception of CSOs in Serbia regarding the implementation of the free access to information right has not changed significantly compared to the previous monitoring cycle. As many as 45% of the respondents believe that the authorities do not meet the prerequisite for free access to information of public importance; that is, they do not consistently document all the information generated in their work. Nevertheless, most of the surveyed CSOs confirm that the requested information is provided free of charge, in the appropriate format and within the legally prescribed time limit.

Additionally, although more than half of the respondents confirm that they are not required to provide reasons for submitting requests for access to information of public importance, as many as 41% of them confirmed that this still happens. As in the previous monitoring cycles, the impression is that civil society in Serbia has little experience with requesting access to information containing confidential or personal data, given that, on average, one-third of the respondents chose the option "I don't know" when answering questions related to requesting information with these types of data.

Finally, when it comes to the perception of the Commissioner's work, the findings show that slightly more than a quarter of respondents consider the Commissioner's measures to be effective in protecting the right to access information of public importance. Additionally, only 15% of CSOs believe that sanctions imposed by the Commissioner for violating the right to access information of public importance produce serious consequences for responsible individuals in institutions that deny citizens this right.

When it comes to proactive informing of the public by the public authorities, the sample of institutions on which monitoring was conducted indicates that there has been no progress and that there are still large disparities. Open data policy is not implemented to an adequate extent, and practice shows that there is still scarce effort to make the available information sufficiently accessible and citizen friendly. Overall, the results in this area have decreased compared to PAR Monitor 2019/2020, and the main shortcomings relate to the non-transparent work of the authorities, which is reflected in the frequent lack of annual work reports and budget documents. Additionally, a small number of institutions publish all the data on their scope of work, organisational structure and cooperation with civil society, and available data is not updated regularly. On the other hand, slightly better results were recorded on the availability of complete and updated information on public policy documents and regulations, as well as policy studies and analysis within the authorities' jurisdiction.

V.6 Recommendations for Accountability

Tracking recommendations from PAR Monitor 2019/2020

Colour coding scheme for tracking recommendations

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Preporuka	Status	Komentar
1. Public authorities at the state administration level should inform by using simple, citizen-oriented language on their websites, focusing on ease of access and better user experience. This should ideally be done by adopting, in the long term, a whole-of-government approach instead of the current approach in which each institution possesses its own website.	Initiated	This monitoring cycle showed that the practice of public authorities remains uneven, although certain posts and documents were assessed as citizen-friendly. Several authorities' websites are aligned with the Government's website in terms of design and structure, but there are still big differences between them.
2. When publishing documents (policy and legal documents, reports, etc.), public authorities should briefly introduce or explain their content and purpose without bureaucratic terminology, focusing on the most important aspects and how they affect the everyday life of citizens, associations, businesses, minority groups, or other groups in society.	No action taken	Based on a sample of public authorities, it was determined that legal and policy documents and reports on the implementation of public policies are not published in a citizen-friendly manner.
3. When providing information on organisational purpose and purview, describing policy areas, and offered services, or similar administrative information (either in the Information Booklets or otherwise online), public authorities should strictly avoid the copy-paste of texts from statutory acts, but rather tailor information to an average citizen.	Partially implemented	This monitoring cycle showed that the practice of public authorities remains uneven. For example, the Ministry of Economy provides information on the competencies of individual sectors but not on the ministry as a whole. The Directorate for Agrarian Payments, the National Employment Service and the Ministry of Human and Minority Rights and Social Dialogue publish citizen-friendly information about their scope of work and competencies.
4. Public authorities at the state administration level should proactively publish their annual work reports online.	No action taken	A review of authorities' websites indicated that only the NES regularly publishes its annual reports, but not in a citizen-friendly way, and that the MoF has an annual report for 2021, but not in the same section where previous reports can be found. ²¹¹

²¹¹ The annual report of the Ministry of Finance is available at: <http://bitly.ws/B74M> and the annual report of the NES is available at: <http://bitly.ws/B74V> (accessed 24 April 2023)

5. Public authorities at the state administration level should start producing and publishing citizen-friendly versions of their annual budgets (financial plans).	No action taken	The practice of publishing citizen-friendly budgets is still uncommon among public authorities. The exception is the NES, which publishes a citizen-friendly annual budget in this way. ²¹²
6. Public authorities at the state administration level should start publishing at least one dataset pertaining to their scope of work in line with the open data standards.	Partially implemented	Publishing datasets in accordance with open data standards is not yet a standardised practice. Out of the 7 authorities mentioned above, only the Ministry of Finance and the Directorate for Agrarian Payments have at least one open dataset related to the scope of work on their websites or a link to the national Open Data Portal where such data can be found. ²¹³ Additionally, the Portal contains datasets submitted by 113 different institutions.
7. Public authorities at the state administration level should clearly display information on cooperation with civil society, and external stakeholders in general, preferably through an easily accessible website section at the homepage.	No action taken	Information on cooperation with civil society and other external actors is rarely published. The Ministry of Human and Minority Rights and Social Dialogue has a section dedicated to civil society that can be accessed from the main page. The Ministry of Finance provides data on cooperation with civil society in the form of reports on conducted public debates and consultations, but this data is not accessible from the home page. ²¹⁴
8. Public authorities at the state administration level should dedicate a separate website section for public consultations and public debates on policy documents and legislation. Alternatively, the authorities can provide a clearly visible link to a new eParticipation portal, as soon as it is made operational, where all public debates and consultations are supposed to be published.	Partially implemented	During the monitoring cycle, it was established that the websites of public authorities usually do not have a separate section dedicated to public consultations and debates. However, invitations to public debates are most often published in the “news” section and contain links to the eConsultation portal. Public authorities that publish data in this way are the Ministry of Economy, NES, MoF and the Ministry of Human and Minority Rights and Social Dialogue.
9. To fully protect the FOI rights, changes to the FOI legislation in Serbia should ensure effective practical implementation of sanctions for all non-compliant authorities, and that the Commissioner’s measures are adequately enforced.	Initiated	The Amendments to the Law on Free Access to Information of Public Importance introduced Articles 28a and 28b, which enable the Commissioner to impose fines, which can be imposed multiple times and are executed by the court, and to submit a request for initiation of misdemeanour proceedings for misdemeanours provided for in this Law. ²¹⁵
		On the other hand, in the Annual Report on the Implementation of the PAR Strategy for 2021, the lack of mechanisms for enforcing the Commissioner’s authority and sanctions in cases of non-compliance with its decisions is cited as an issue that has yet to be resolved.

212 Available at: <http://bitly.ws/B75u> (accessed 24 April 2023).

213 Examples are available at: <http://bitly.ws/B764> and <http://bitly.ws/B76d> (accessed 24 April 2023).

214 Information can be found on the websites of the ministries: <http://bitly.ws/B76C> and <http://bitly.ws/B76F> (accessed 24 April 2023).

215 Law on Free Access to Information of Public Importance: <http://bitly.ws/AC7A> (accessed 24 April 2023).

<p>10. Regulation on closer conditions for creation and maintenance of web presentation of authorities from 2018 should be amended to include provisions defining the use of citizen-friendly language when communicating and releasing information through webpages.</p>	<p>No action taken</p>	<p>No amendments to the Regulation have been adopted since 2018.</p>
<p>11. Responsible authority, currently the Ministry for Human and Minority Rights and Social Dialogue, should update and promote database of contact points for cooperation with civil society, initiated by the Office for Cooperation with Civil Society in 2019.</p>	<p>Fully implemented</p>	<p>The contact database is up-to-date and available on the Ministry's website.²¹⁶ The researchers verified that database is up to date by directly contacting designated contact point.</p>
<p>12. Public authorities at the state administration level that have appointed a contact person for cooperation with civil society, should clearly communicate this on their webpages – either by linking to existing database of contact points, or by providing information on contact person at a clearly visible online location.</p>	<p>Partially implemented</p>	<p>Four of the seven observed authorities had online contact information for cooperation with civil society – the Ministry of Economy, Ministry of Human and Minority Rights, MoF and NES. Except for the Ministry of Economy, this information is assessed as accessible, i.e., available less than three clicks from the home page.</p>
<p>13. Public authorities at the state administration level should adequately record and document all information and data resulting from their work to enable free access to information in full.</p>	<p>N/A</p>	<p>The unified information system of Information booklets of public authorities, which enables easier search, analysis and comparison of information proactively published by public authorities, started operating in February 2022. Public authorities were obliged to publish their Information Booklets in the system by November 17th, 2022.²¹⁷ However, given the large number of authorities that are obliged to publish them, it is not possible to determine whether all information is adequately documented.</p>
<p>14. A legally binding rule should be introduced for proactive and accessible publishing of all or most of the documents, data and information created in the work of public authorities, with limited, clear, and justified exceptions (open by default), including their publication in machine-readable format.</p>	<p>Partially implemented</p>	<p>Article 39 of the Law stipulates the obligation of public authorities to prepare an Information Booklet and specifies the information it must contain. In the event that the authority does not prepare and update the Booklet, the Commissioner is, according to the amendments to the Law from 2021, authorised to submit a request for initiation of misdemeanour proceedings.²¹⁸ However, during the monitoring cycle, it was determined that only two of the seven authorities analysed in this chapter had published data in a machine-readable format (MoF and the Directorate for Agrarian Payments).</p>

216 Available at: <http://bitly.ws/B78y> (accessed 24 April 2023).

217 The Infomator system is available at: <http://bitly.ws/B78M> (accessed 25 April 2023).

218 Law on Free Access to Information of Public Importance: <http://bitly.ws/AC7A> (accessed 25 April 2023).

PAR Monitor 2021/2022 recommendations

Most of the recommendations from PAR Monitor 2019/2020 are still relevant, hence, a large number of them have been repeated. Accordingly, no new recommendations have been defined for this monitoring cycle. Certain repeated recommendations have been modified to a lesser extent for harmonising with legal or strategic framework changes or for their clarification and concretisation.

Repeated and modified recommendations from PAR Monitor 2019/2020

1. Public authorities at the state administration level should inform by using simple, citizen-oriented language on their websites, focusing on ease of access and better user experience. This should ideally be done by adopting, in the long term, a whole-of-government approach instead of the current approach in which each institution possesses its own website.
2. When publishing documents (policy and legal documents, reports, etc.), public authorities should briefly introduce or explain their content and purpose without bureaucratic terminology, focusing on the most important aspects and how they affect the everyday life of citizens, associations, businesses, minority groups, or other groups in society.
3. When providing information on organisational purpose and purview, describing policy areas, and offered services, or similar administrative information (either in the Information Booklets or otherwise online), public authorities should strictly avoid the copy-paste of texts from statutory acts, but tailor information to an average citizen.
4. Public authorities at the state administration level should proactively publish their annual work reports online.
5. Public authorities at the state administration level should start producing and publishing citizen-friendly versions of their annual budgets (financial plans).
6. Public authorities at the state administration level should start publishing at least one dataset pertaining to their scope of work in line with the open data standards.
7. Public authorities at the state administration level should clearly display information on cooperation with civil society, and external stakeholders in general, preferably through an easily accessible section on the website's homepage.
8. Public authorities at the state administration level should dedicate a separate website section for public consultations and public debates on policy documents and legislation. Alternatively, the authorities can provide a clearly visible link to a new eConsultation portal, as soon as it is made operational, where all public debates and consultations are supposed to be published.
9. To fully protect the FOI rights, changes to the FOI legislation in Serbia should ensure effective practical implementation of sanctions for all non-compliant authorities, and that the Commissioner's measures are adequately enforced.
10. Regulation on closer conditions for creation and maintenance of web presentation of authorities from 2018 should be amended to include provisions defining the use of citizen-friendly language when communicating and releasing information through webpages.
11. Public authorities at the state administration level that have appointed a contact person for cooperation with civil society, should clearly communicate this on their webpages – either by linking to existing database of contact points, or by providing information on contact person at a clearly visible online location.
12. A legally binding rule should be introduced for proactive and accessible publishing of all or most of the documents, data and information created in the work of public authorities, with limited, clear, and justified exceptions (open by default), including their publication in machine-readable format.

VI.

SERVICE DELIVERY



VI. 1 WeBER indicators used in Service Delivery and country values for Serbia



SD_P3_I1: Public perception and availability of information on citizen feedback regarding the quality of administrative services



SD_P4_I2: Availability of information regarding the provision of administrative services on the websites of service providers



VI.2 State of play in Service Delivery and main developments since 2020

Strategies, legislative and institutional framework

Clear mechanisms of coordination in the field of service provision, which is covered by a set of strategic documents, from the PAR Strategy, eGovernment Development Programme, to the Programme for Simplification of Administrative Procedures and Regulations – ePAPER, are still missing. In the Annual Report on the Implementation of the PAR Strategy for 2021, the lack of regulation and uniform standards for the entire service provision policy is highlighted.²¹⁹

In addition to the PAR Strategy, the strategic framework in this area is governed by the eGovernment Development Program for the period from 2020 to 2022. After its expiration, the MPALSG prepared the Proposal for the same program for the period from 2023 to 2025 with an accompanying Action Plan. The public hearing on the draft Program was held from December 23rd, 2022, to January 11th, 2023, and the Program was adopted in the same year in April.²²⁰ The text of the document states that the general goal of the new program is “the development of efficient and user-oriented administration in a digital environment.”²²¹

Additionally, two Programmes for the Simplification of Administrative Procedures and Regulations – “e-Paper” were adopted in the previous period. The first one was in effect from 2019 to 2021, and a public hearing on the Proposal of the Programme “e-Paper” 2022 – 2025, with an accompanying Action Plan, was held in November and December 2022. The new Programme’s intention is to further simplify and digitize administrative procedures, and to improve the content of the Register of Administrative Procedures, among other things.²²² During the public hearing, stakeholders did not submit any comments on the proposal.

219 Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the PAR Strategy 2021-2030, p. 34. Available at: <http://bitly.ws/B77R> (accessed 20 April 2023)

220 A report on the public hearing, available at: <http://bitly.ws/zru5> (accessed 24 April 2023)

221 Ministry of Public Administration and Local Self-Government, Proposal for the eGovernment Development Program 2023-2035. with accompanying Action Plan, p. 23. Available at: <http://bitly.ws/DqqL> (accessed 24 April 2023)

222 The report on the conducted public discussion is available at: <http://bitly.ws/Ab2A> (accessed 24 April 2023)

Apart from the new strategic framework adopted in the previous two years, previous editions of PAR Monitor pointed out that the Law on General Administrative Procedure introduced the “once only” principle, in which citizens and business entities can be asked to provide necessary data from official records, such as the facts contained in the civil registers, only once for the purpose of decision-making in the administrative procedure, after which the authorities exchange information internally, with due respect for the protection of personal data. In addition, the Law on Electronic Administration, adopted in 2018, enabled the functioning of electronic administration, and its implementation led to the interoperability of databases between state authorities as well as the electronic exchange of data.²²³ Important aspects of the e-service provision are also regulated by the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business²²⁴, such as the use of electronic signatures and seals, issuance of qualified certificates for electronic signatures, authentication of internet sites, and others.

■ Digital transformation and provision of electronic services

The MPALSG estimates that the eGovernment Development Program of 2020-2022 led to improvements in the field of providing electronic services, but also in other segments of public administration work, by increasing efficiency, transparency, and accountability.²²⁵ The number of active users of the eGovernment portal increased from 320,000 in 2020 to 1,150,576 in 2021, with an increase in the number of available e-services to 196 in the same year (140 in 2020).²²⁶ In addition, an increase in the total number of access to services by citizens on the eGovernment Portal was recorded, from 1,100,000 in 2020 to 2,253,547 in 2021.²²⁷ All services related to the COVID-19 pandemic are digitized and available on a special section of the eGovernment Portal.²²⁸ Also, the use of electronic services for tax payments saw a 15 times increase in 2021.²²⁹

According to the Report on the Implementation of the PAR Strategy for 2021, the “e-Paper” Programme for 2019-2021 led to significant improvements in the provision of e-services and contributed to the simplification of 330 administrative procedures.²³⁰ With the implementation of the Programme, and based on the adopted Law on the Register of Administrative Procedures, the Register of Administrative Procedures was established, representing a unique electronic database of all procedures carried out by public administration bodies.²³¹ The portal started operating in June 2021, with more than 2,600 procedures available.²³² Previously, the PPS and the Office for Information Technologies and eGovernment had started the process of inventorying administrative procedures in March 2021, in order to establish a single place with all the necessary information about public administration procedures for the economy and citizens.²³³ At the Open Government Partnership Impact Awards global competition in December 2021, the “e-Paper” Program won second place for the reform with the greatest impact on citizens and the economy, against 18 European countries.²³⁴

In addition, the eCitizen concept was developed in the previous period. An eCitizen is any person who has a user account on the Electronic Identification Portal - eID, i.e., any citizen of the Republic of Serbia, as well as a

223 Law on electronic administration Official Gazette no. 27/2018. The PAR Strategy 2021-2023 states that at the time of adoption, 23 sets of data from eight institutions and the 321st government body were interoperable and that over 1.4 million data exchanges were registered as of January 2017. with the expected integration of other important registers.

224 Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, Official Gazette no. 94/2017-9, 52/2021-22. Available at: <http://bitly.ws/KCCp> (accessed 24 April 2023)

225 Ministry of Public Administration and Local Self-Government, Proposal for the Program for the Development of Electronic Administration in the Republic of Serbia 2023-2035, with the Action Plan for its implementation, p. 10.

226 Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the RJU Strategy 2021-2030, p. 42. New e-services that were introduced in the observed period are a renewal of driver's licenses, an electronic banking service that allows citizens to access their data online, as well as an online service for submitting requests for parking tickets and places for people with disabilities.

227 Mysun En Natour, Aleksandar Stojanovic, Goran Pastrovic, Ex-post analysis of the Electronic Government Development Program in the Republic of Serbia 2020 2022, p. 24. Available at: <http://bitly.ws/zrx> (accessed 24 April 2023)

228 Available at: <http://bitly.ws/Dqr5> (accessed 21 April 2023)

229 Mysun En Natour, Aleksandar Stojanovic, Goran Pastrovic, Ex-post analysis of the Electronic Government Development Program in the Republic of Serbia 2020 2022, p. 24. Available at: <http://bitly.ws/zrx> (accessed 24 April 2023)

230 Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the PAR Strategy 2021-2030, p. 45.

231 The portal is available at: <http://bitly.ws/DrPq> (accessed 24 April 2023)

232 More on: <http://bitly.ws/DrPM> (accessed 24 April 2023)

233 More on: <http://bitly.ws/DrQq> (accessed 24 April 2023)

234 Available at: <http://bitly.ws/DrRj> (accessed 24 April 2023)

foreign citizen with or without residence.²³⁵ From February 1st 2023, diplomatic and consular missions began to issue parameters for electronic identification, which enables Serbian citizens in the diaspora to access all eGovernment services.²³⁶

Serbia is generally globally well positioned in the area of e-government according to international indexes. The United Nations eGovernment Development Index places Serbia in 40th place out of 193 countries in 2022 (50th in 2020), with an index of 0.82 (out of a maximum of 1).²³⁷ Within the sub-index of e-Participation, Serbia ranks 15th out of 193 countries (ranked 41st in 2020), with an index of 0.80.²³⁸ Similarly, the World Bank's GovTech Maturity Index (GTMI) for 2022, which measures digital transformation in the public sector of 198 countries, places Serbia in the group of leaders in this field with a very high GTMI, along with 62 other countries.²³⁹ However, in the eGovernment Benchmark of the European Commission, which compares how governments across Europe provide digital public services, Serbia ranks 31st among 35 countries with an average score of 49%. Although 3 out of 4 dimensions of this index were rated well, Serbia's low average rating was mostly influenced by the dimension related to cross-border services, which is still insufficiently developed.²⁴⁰

■ Accessibility of services

Since the last PAR Monitor, the number of open one-stop shops for the facilitated provision of services to citizens has increased to 25 by March 2022, while 17 new ones were expected to open by the end of 2022.²⁴¹ The most common services provided in one-stop shops are those in the field of social insurance, property relations, and local utility services.²⁴² This area remains unregulated because the process of adopting the regulation on one-stop shops has not been completed yet.²⁴³ In its 2021 report for Serbia, SIGMA estimated that the perception of accessibility to public services has improved, but that further improvements are still needed, since the options for easier use of websites of administrative bodies, such as magnified, automatic text reading, adaptation contrast and similar, often do not work.²⁴⁴ Accessibility of services is an aspect that is regulated by the Strategy for Improving the Position of Individuals with Disabilities for the period 2020-2024, which aims, among other things, to remove obstacles in the area of accessibility²⁴⁵; however, according to SIGMA, there is little information in the Strategy on the situation in practice when it comes to accessibility.²⁴⁶

VI.3 What does WeBER monitor and how?

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.

235 Additional clarifications, along with access to the Portal, are available at: <http://bitly.ws/DrK6> (accessed 24 April 2023)

236 Available at: <http://bitly.ws/DrKg> (accessed 24 April 2023)

237 United Nations, *E-Government Development Index*, Available at: <http://bitly.ws/DrVN> (accessed 24 April 2023)

238 Ibid.

239 World Bank, GovTech maturity index 2022 update: trends in public sector digital transformation, p. 37. Available at: <http://bitly.ws/DrWn> (accessed 24 April 2023)

240 Electronic services are evaluated based on four dimensions: user centricity, transparency, key enablers, and cross-border services.

241 Available at: <http://bitly.ws/Dqgc> (accessed 24 April 2023)

242 Mysun En Natour, Aleksandar Stojanovic, Goran Pastrovic, Ex-post analysis of the Electronic Government Development Program in the Republic of Serbia 2020-2022, p. 24. Available at: <http://bitly.ws/zrx> (accessed 24 April 2023) Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the PAR Strategy 2021-2030, p. 26.

243 Ministry of Public Administration and Local Self-Government, Annual Report for 2021 on the Implementation of the RJU Strategy 2021-2030, p.37.

244 SIGMA, *Monitoring Report for Serbia*, 2021, str. 109. Available at: <http://bitly.ws/zxEK> (accessed 21 April 2023)

245 The Strategy for Improving the Position of Individuals with Disabilities 2020-2024, Official Gazette no. 44/2020-176. Available at: <http://bitly.ws/KCQD> (accessed 21 April 2023)

246 SIGMA, *Monitoring Report for Serbia*, 2021, p. 109.

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 the quality of everyday life of citizens.

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

Four indicators were used: two fully measured with perception data (perceptions from civil society and the public) and two by using a combination of perception and publicly available data. The public perception survey employed three-stage probability sampling targeting the public. It focused on citizen-oriented service delivery in practice, covering various aspects of awareness, efficiency, digitalization, and feedback mechanisms. Since a public perception survey was implemented during the COVID-19 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.²⁴⁷

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,²⁴⁸ 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.²⁴⁹ Finally, the websites of providers of the same sampled services were analysed to collect information on their accessibility and prices.

VI.4 WeBER monitoring results

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

Table 21: Public perception of the citizen orientation of public administration

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Citizens are aware of government administrative simplification initiatives or projects	2/2	2/2	1/2
E2. Citizens confirm that administrative simplification initiatives or projects of the government have improved service delivery	4/4	4/4	4/4
E3. Citizens confirm that dealing with the administration has become easier	4/4	4/4	2/4
E4. Citizens confirm that time needed to obtain administrative services has decreased	4/4	4/4	2/4
E5. Citizens consider that administration is moving towards digital government	2/2	2/2	2/2
E6. Citizens are aware about the availability of e-services	2/2	2/2	1/2

²⁴⁷ Perception is analysed by surveying public opinion (persons over 18 years old) in the Western Balkans. A three-stage, representative sample was used for the public opinion survey, and the survey was conducted by combining online and computer-assisted telephone surveys (CAWI - Computer Assisted Web Interviewing, and CATI - Computer Assisted Telephone Interviewing), using a standardized questionnaire for omnibus surveys.

²⁴⁸ The survey of CSOs was administered through an anonymous, online questionnaire. In Serbia, the survey was conducted in the period from 23 June to 24 July 2020. The data collection method included CASI (computer-assisted self-interviewing). The survey sample was N=184.

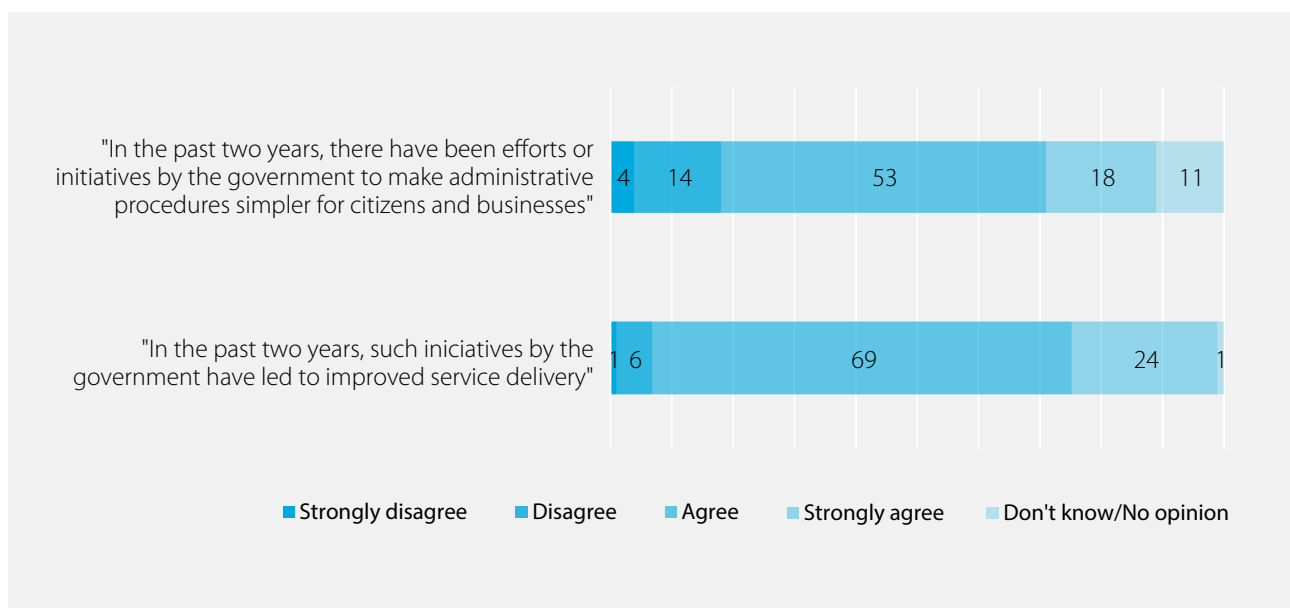
²⁴⁹ The five services included were: 1) property registration, 2) company (business) registration 3) vehicle registration 4) the issuing of personal documents: passports and ID cards and 5) value added tax (VAT) declaration and payment for companies.

E7. Citizens are knowledgeable about ways on how to use e-services	2/2	2/2	2/2
E8. Citizens use e-services	4/4	2/4	2/4
E9. Citizens consider e-services to be user-friendly	2/2	2/2	2/2
E10. Citizens confirm that the administration seeks feedback from them on how administrative services can be improved	1/2	1/2	1/2
E11. Citizens confirm that the administration uses their feedback on how administrative services can be improved	4/4	4/4	4/4
Total score	31/32	29/32	23/32
Indicator value (scale 0 – 5)²⁵⁰	5	5	4

Citizens of Serbia perceive the provision of services by state administration bodies as mostly directed towards citizens, given that the public opinion survey once again resulted in a positive perception. The indicator, therefore, maintained its maximum value, as well as an overall increase in points compared to the 2019/2020 monitoring cycle. The increase in points is the result of a higher number of citizens who declared that they used e-services in the previous two years. That e-services are on the rise is also indicated by the fact that over half of those who used them (57%) received the complete service online, from request to receipt, every time they requested service in this way, while only 1% of citizens never managed to finalize services when receiving them online.

The findings of the survey show the same results as in the previous survey regarding the visibility of efforts to simplify administrative procedures. Namely, 71% of citizens are aware of the Government's efforts in this area. This is the same result as in the previous cycle but also represents a significant difference of 15 percentage points compared to the baseline PAR Monitor 2017/2018. Among citizens who are aware of such efforts by the Government, there is significant agreement (over 90%) that such efforts have actually led to improved service delivery. The high degree of satisfaction with the initiatives for simplifying procedures and their results, which has remained at a high level or has been increasing over the years, points to the continuous action of decision-makers in this direction.

Chart 32: Public perception on simplification of administrative services (%)

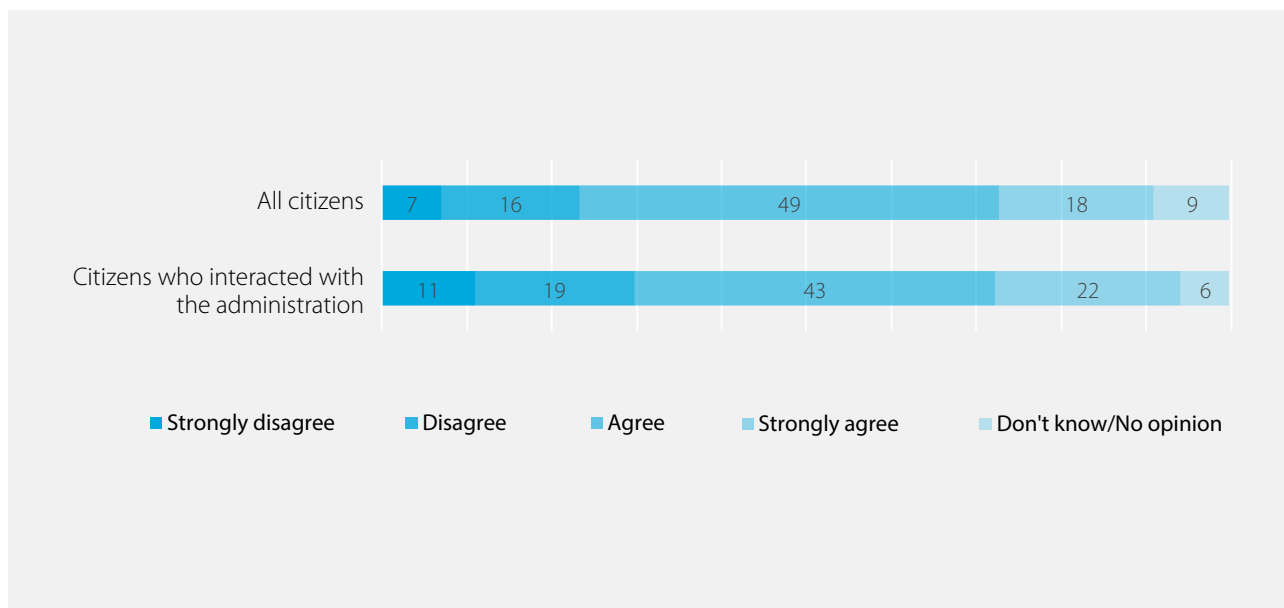


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1005 for the first statement; n = 708 for the second statement.

250 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

Citizens' perception of other aspects of interaction with the administration is at a high level for the second monitoring cycle in a row. The majority of citizens believe that contact with the administration has become easier in the last two years (69%) and that it takes less time to obtain administrative services (67%). It is important to point out that the results are similar by region (between 63% and 72%)²⁵¹, as well as among citizens living in urban and rural areas (for both statements, an average agreement is around 68%). Overall, the findings show a continuation of positive perception on both statements compared to the previous measurement, which is almost 30 percentage points higher compared to the baseline PAR Monitor 2017/2018, when an agreement was around 40%. Still, approximately a quarter of citizens do not recognize improvements in communication with the administration and shortening of the time needed to obtain services, which shows that it is necessary to continue deepening the reforms in matters of ease and efficiency of contact with the administration.

Chart 33: In the past two years, the time needed to obtain administrative services has decreased (%)



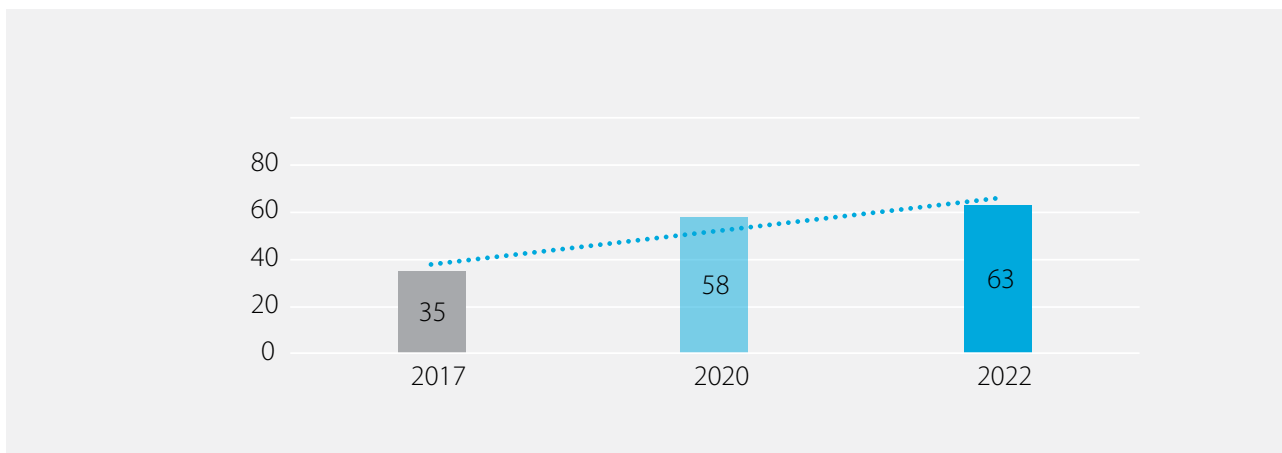
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1005; N = 536.

A significant majority of citizens generally recognize the Government's efforts in the development of digital government. As many as 85% notice the Government's efforts in the direction of digitization, which is also a slight increase in percentage points compared to the survey from the previous cycle. On the other hand, in terms of citizens' awareness of the existence of e-services, there has been no progress - 65% of respondents are aware that they exist, compared to 64% from 2019/2020, while more than a third (34%) still have no knowledge about their existence. Likewise, there was no change when it came to those unfamiliar with e-services, and most people over 60 years did not know about digital channels (60%). Overall, a third of the population between 45 and 60, as well as more than 16% of the population in the 30 and 44 age group, were not familiar with e-services. Nevertheless, there is a noticeable continuity in the citizens' perception of their awareness of how to use e-services, given that over 90% of respondents declared that they were completely or mostly familiar with how to use them.

Among citizens who have been in contact with the administration in the past two years, and who believe that they are at least somewhat informed about e-services, 37% of them have rarely or never used them, compared to over 40% of respondents in the cycle 2019/2020, representing a step forward in this domain. Additionally, almost 90% of those who used e-services received the complete service electronically always or often, and 85% of them rated the use of e-services as easy. Such findings confirm that the number of users of eGovernment in Serbia increases over time and that those with experience in using digital services are mostly satisfied with the way they are provided.

251 Vojvodina, Belgrade, Šumadija and West Serbia, South and East Serbia

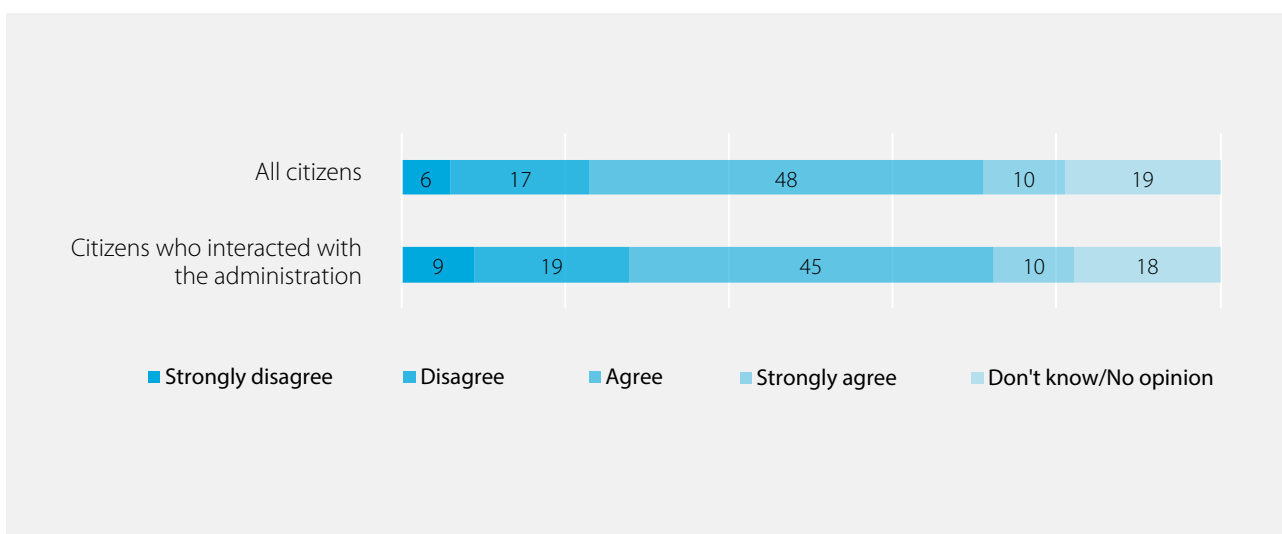
Chart 34: Thinking about the past two years, how often have you used the e-services of the administration? (% of answers "sometimes" and "often")



Note: base n=409 (2017), n=611 (2020), n=643 (2022).

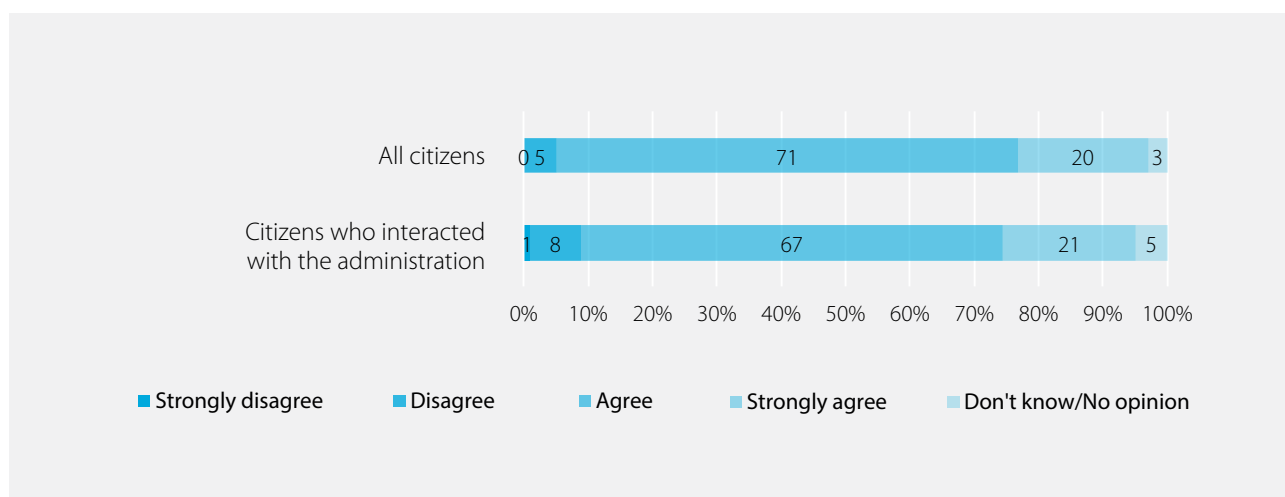
Finally, the citizens of Serbia believe that the administration is asking for suggestions on how to improve the provision of administrative services. Namely, almost 60% of them agree that they were invited to submit proposals, with less than a quarter of the population thinking the opposite (23%). Among those who feel that they are involved in this way, over 90% also believe that the administration uses their feedback for improvement.

Chart 35: In the past two years, the administration has asked for citizens' proposals on how to improve administrative services (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1005; n = 536.

Chart 36: In the past two years, the government has used such proposals from citizens, to improve administrative services (%)

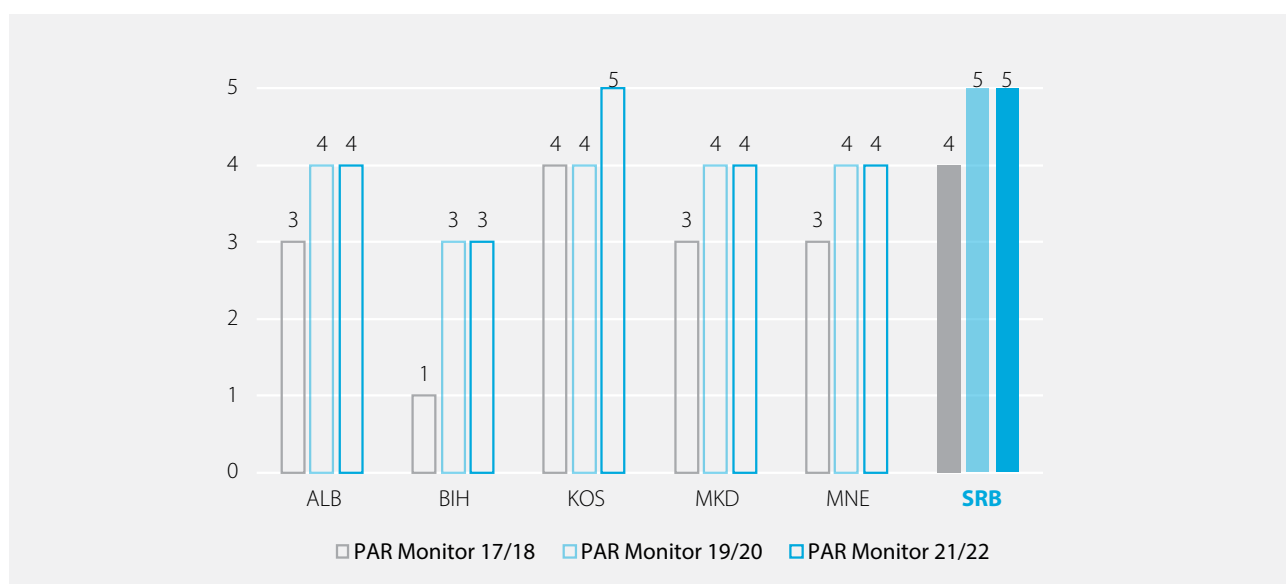


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N=579, N=290.

With 3 points more than in the 2019/2020 monitoring cycle, the indicator has kept the highest value. The better overall result was due to the increased use of e-services - 63% of Serbian citizens said that they had used these services in the previous two years, and among users, 85% emphasized they are easy to use. Also, in 2022, citizens generally believed that the provision of services is moving towards digitization (85% of respondents). Additionally, about 70% of citizens were aware of the government's efforts towards administrative simplification, and a large share of those aware (93%) agreed that such initiatives in the last two years have led to improvements in service delivery in practice. Moreover, most citizens believe that working with the administration has become easier and that the time needed to obtain administrative services has decreased (67-68%).

How does Serbia do in regional terms?

Chart 37: Public perception of state administration's citizen orientation



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org.

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

Table 22: Public perception and availability of information on citizen feedback regarding the quality of administrative services

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Citizens consider they have the possibility to provide feedback on the quality of administrative services	2/2	2/2	1/2
E2. Citizens perceive feedback mechanisms as easy to use	4/4	2/4	4/4
E3. Citizens perceive themselves or civil society as involved in monitoring and assessment of administrative services	2/4	2/4	0/4
E4. Citizens perceive that administrative services are improved as a result of monitoring and assessment by citizens	4/4	4/4	4/4
E5. Basic information regarding citizens' feedback on administrative services is publicly available	0/4	0/4	2/4
E6. Advanced information regarding citizens' feedback on administrative services is publicly available	0/2	0/2	0/2
Total score	12/20	10/20	11/20
Indicator value (scale 0 – 5)²⁵²	3	2	2

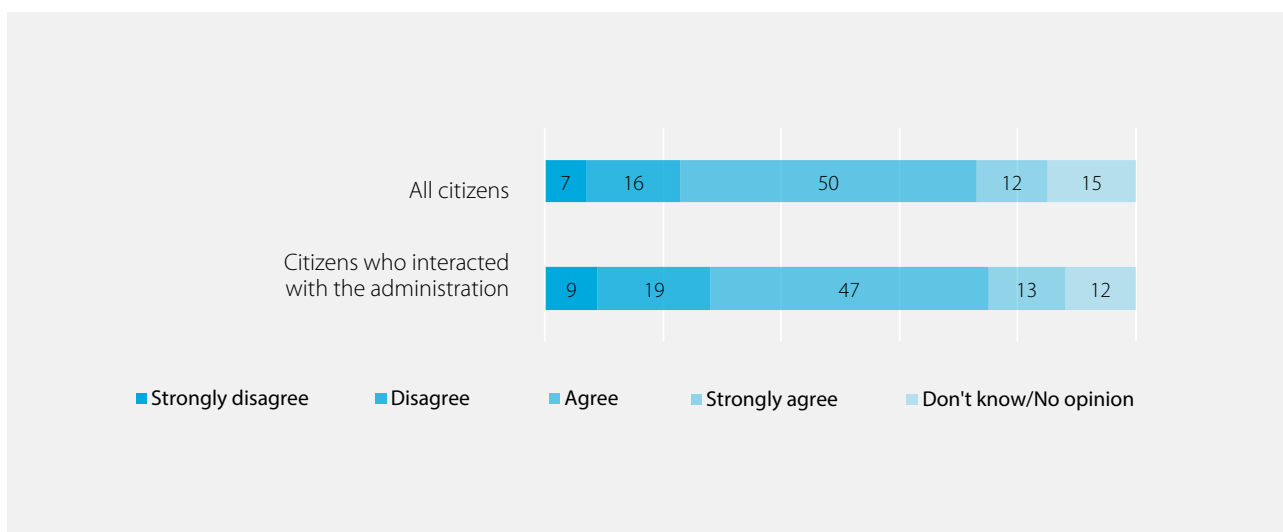
The previous indicator analysed whether the administration proactively seeks suggestions from citizens on how to improve the provision of services in general among other things. This indicator takes a narrower perspective and analyses whether citizens, as users of public services, can directly provide feedback on the quality of specific services they receive. The findings show that public opinion is generally positive when it comes to such a possibility. On the other hand, an analysis of the websites of administrative service providers reveals that they rarely publish data on received user feedback.

As in the previous monitoring cycle, 60% of citizens believe that they can provide feedback on the quality of individual services they receive. On the other hand, 23% of them do not believe that such a possibility exists, and 15% do not have a clear opinion. However, during the monitoring period, and at the time of writing this report, there was no possibility to leave comments on individual services on the eGovernment portal. These findings suggest that citizens used other channels to provide feedback, i.e., that the feedback given did not necessarily refer to the quality of services available on the portal.

Among citizens who believe they have the opportunity to provide feedback, two-thirds of them rate the channels for providing feedback as easy to use. This indicates a positive shift compared to the previous cycle when 38% of respondents thought they were simple. However, the percentage of those who consider such channels difficult to use remains unchanged and accounts for about a quarter of those who believe they have the opportunity to send feedback (24%). Also, it is important to point out that the number of those who do not know how to use these channels decreased from 37% in the previous research cycle to 9% in the last survey from 2022. Despite the increase in the number of those who know how to use the existing channels for providing feedback, the fact that still a large number of citizens think that there is no opportunity to share experiences and opinions about the quality of services or do not have a clear opinion (about 40%), points to the necessity of establishing and promoting additional options for that purpose.

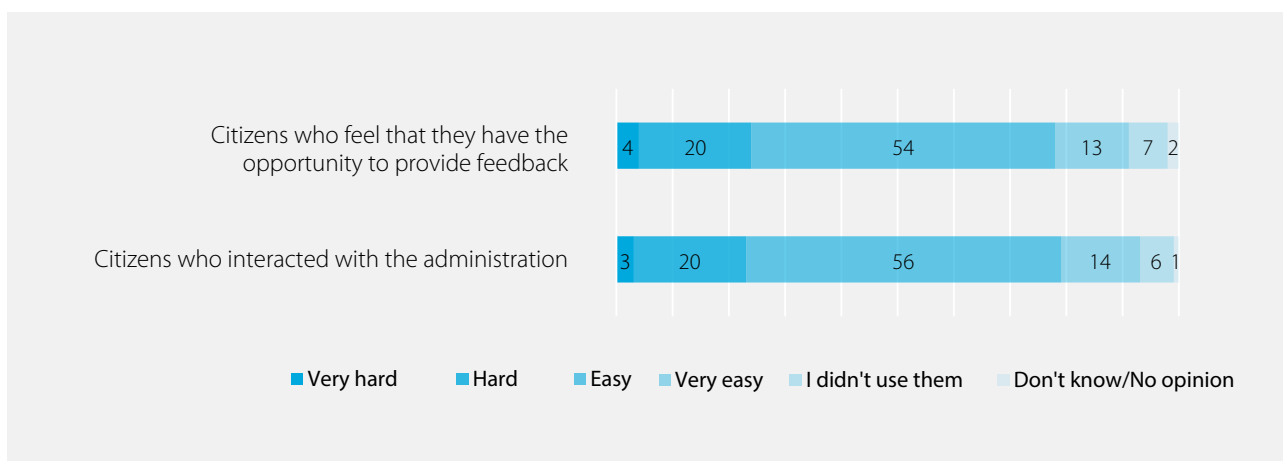
²⁵² Conversion of points: 0-4 points = 0; 5-8 points = 1; 9-11 points = 2; 12-14 points = 3; 15-17 points = 4; 18-20 points = 5

Chart 38: As a user of administrative services, I have possibilities to give my opinion on the quality of the individual services that I receive (obtain)? (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1005; n = 536.

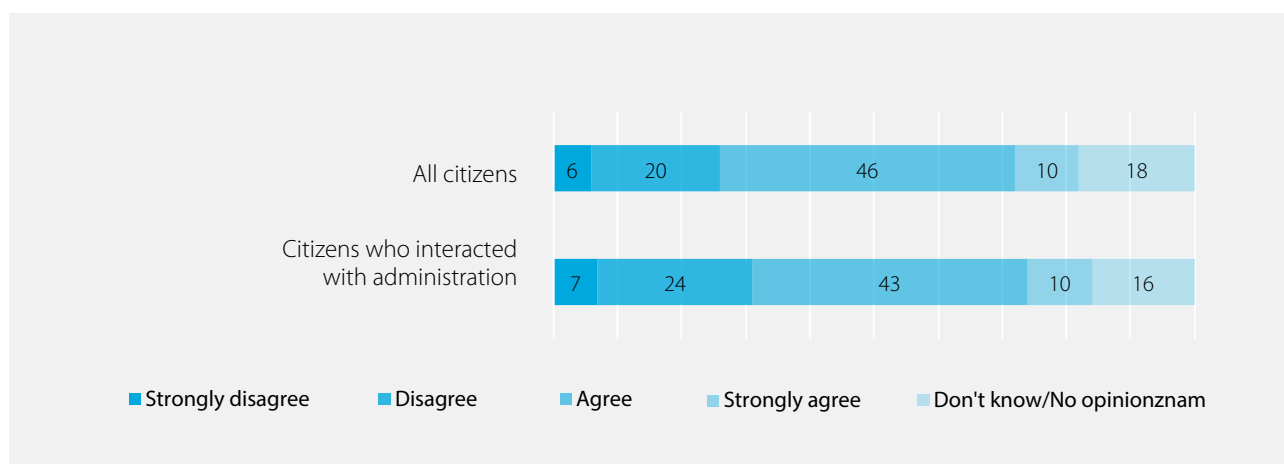
Chart 39: In your experience, how easy or difficult to use are the channels for citizens to provide their opinion on the quality of administrative services?



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 626, n = 321.

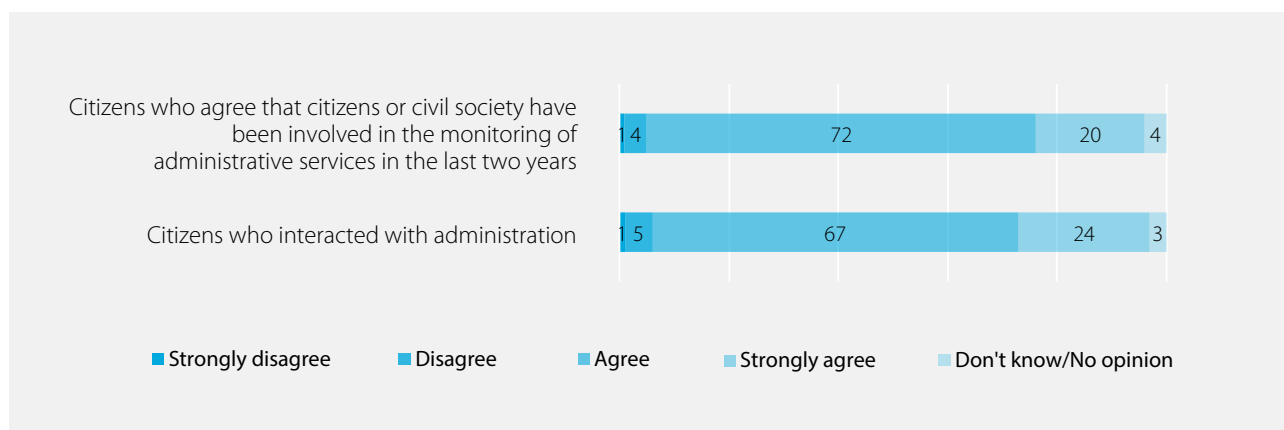
Public opinion about the involvement of citizens and CSOs in monitoring the provision of administrative services remains unchanged. Slightly more than half of the population (56%) believes that civil society or citizens were involved in such monitoring in the previous two years. On the other hand, out of the total number of respondents, 26% believe that there was no involvement. What is encouraging is that among those who recognize such monitoring activities, over 90% of them believe that citizen participation has led to improved service delivery.

Chart 40: In the past two years, citizens or civil society have been involved in the monitoring of administrative services (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was $N = 1005$, $n = 536$.

Chart 41. 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%. The base for these questions was $N=563$, $n = 285$.

Finally, as in previous editions of the PAR Monitor, it was analysed to what extent data on feedback (basic²⁵³ or advanced²⁵⁴) provided by citizens is made publicly available. A review of the websites of five administrative service providers resulted in a general lack of transparency, for the third cycle in a row.²⁵⁵ None of the analysed service providers disclosed such information, including the Business Registers Agency (BRA), which in this cycle was the only one to have some information on its website, as general statistics on received complaints were published in the annual reports. Therefore, the proactive, public presentation of data on user satisfaction with administrative services in Serbia is still at an extremely low level, which represents a serious deficiency when it comes to the transparency of service provision, but also the responsibility of service providers toward citizens.

253 Basic information refers to data from at least one source, be it administrative data, survey data, civil society monitoring data, or another credible source.

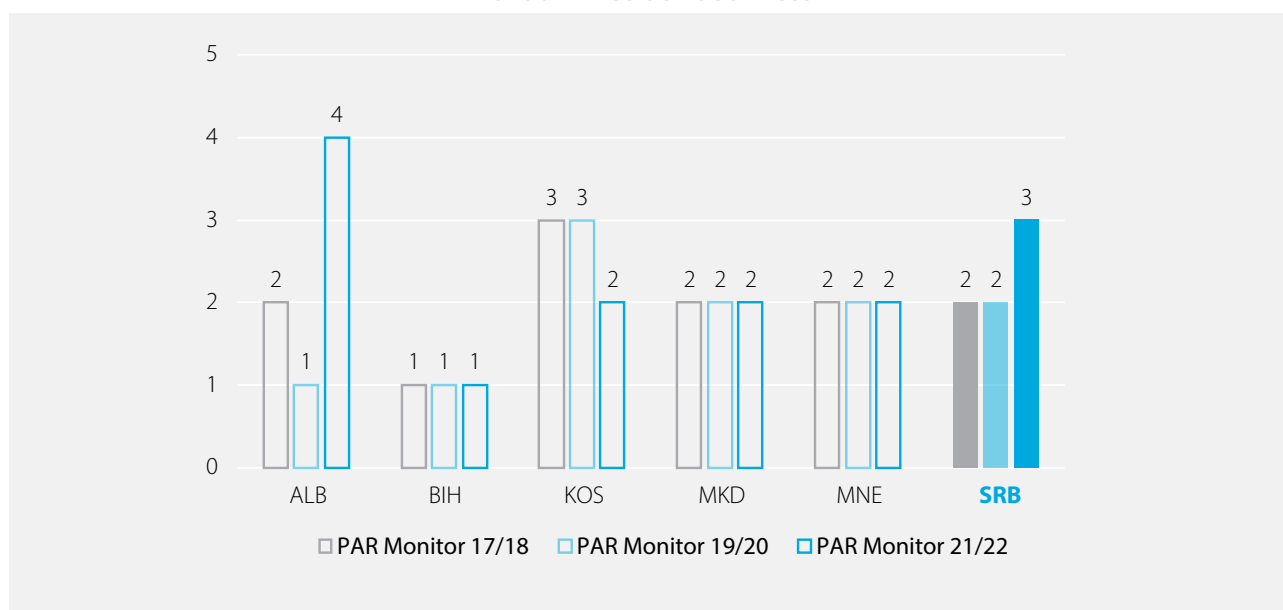
254 Advanced information refers to any of the three following cases: 1) Data/information on citizens' feedback includes information from at least two different credible sources; 2) Data is segregated based on gender, disabilities, or other relevant issues (such as ethnicity in countries where this relevant, 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).

255 The indicator included the following services: property registration, company (business) registration, vehicle registration, the issuing of passports and ID cards, and value-added tax (VAT) declarations and payments for companies.

Compared to the previous two PAR Monitors, the increased value of the indicator in this cycle is the result of positive public perception. Most citizens (63%) believe that there is an opportunity to provide feedback on the quality of administrative services, and two-thirds of them believe that the mechanisms for providing feedback are easy to use. Also, a little more than half of the population (56%) believes that civil society and citizens were involved in the monitoring of administrative services in the last two years, which is almost the same response as in the 2019/2020 cycle; among them, 92% of them believe this has led to improved service delivery in practice. On the other hand, service providers do not proactively publish data on citizens' feedback on their websites.

■ How does Serbia do in regional terms?

Chart 42: Public perception and availability of information on citizen feedback regarding the quality of administrative services



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org

Principle 4: Mechanisms for ensuring the quality of public services are in place

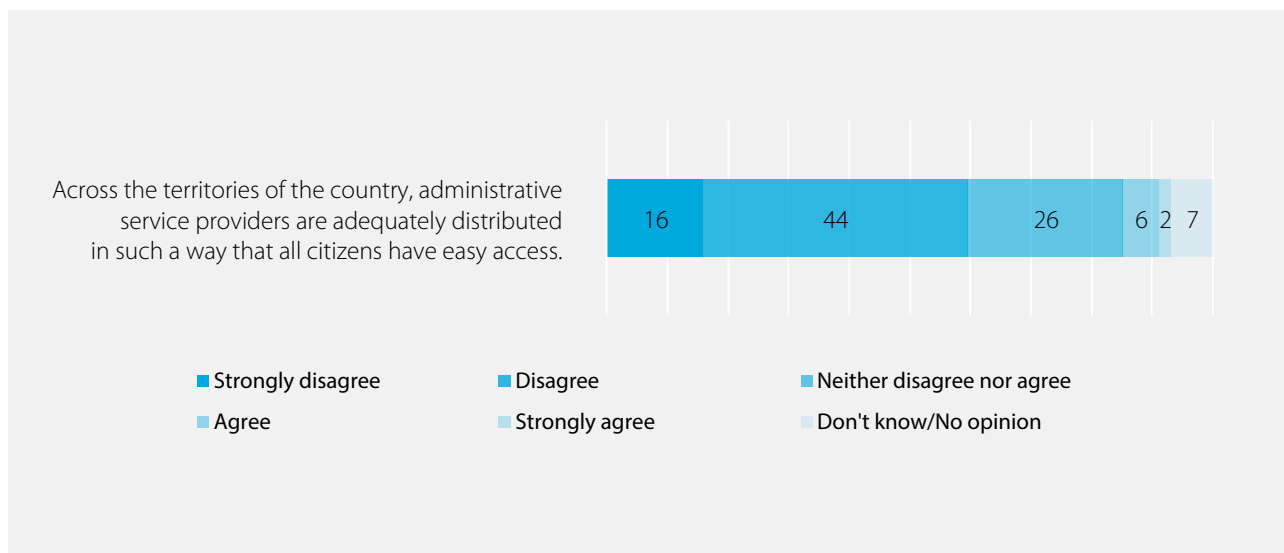
Table 23: CSOs' perception of accessibility of administrative services

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. CSOs confirm the adequacy of territorial network for access to administrative services	0/4	0/4	0/4
E2. CSOs confirm that one-stop-shops are made accessible to all	0/4	0/4	0/4
E3. CSOs consider administrative services to be provided in a manner that meets the individual needs of vulnerable groups	0/4	0/4	0/4
E4. CSOs confirm that administrative service providers are trained on how to treat vulnerable groups	0/2	0/2	0/2
E5. CSOs confirm that the administration provides different channels of choice for obtaining administrative services	1/2	1/2	0/2
E6. CSOs confirm that e-channels are easily accessible for persons with disabilities	0/2	0/2	0/2
Total score	1/18	1/18	0/18
Indicator value (scale 0 – 5)²⁵⁶	0	0	0

256 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

Since the beginning of the implementation of the PAR Monitor, CSOs in Serbia have expressed strong dissatisfaction when it comes to the accessibility of administrative services. Namely, only 7.5% of the surveyed CSO representatives believe that the institutions that provide them are adequately spread across the territory. Also, most of the interviewed civil society representatives evaluate one-stop shops in Serbia as not accessible to everyone (53%). Overall, the physical availability of services remains predominantly negatively perceived, despite the recent increase in the number of established one-stop shops.

Chart 43: CSO perception on adequacy of the territorial distribution of administrative services (%)



Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for this question was N=120.

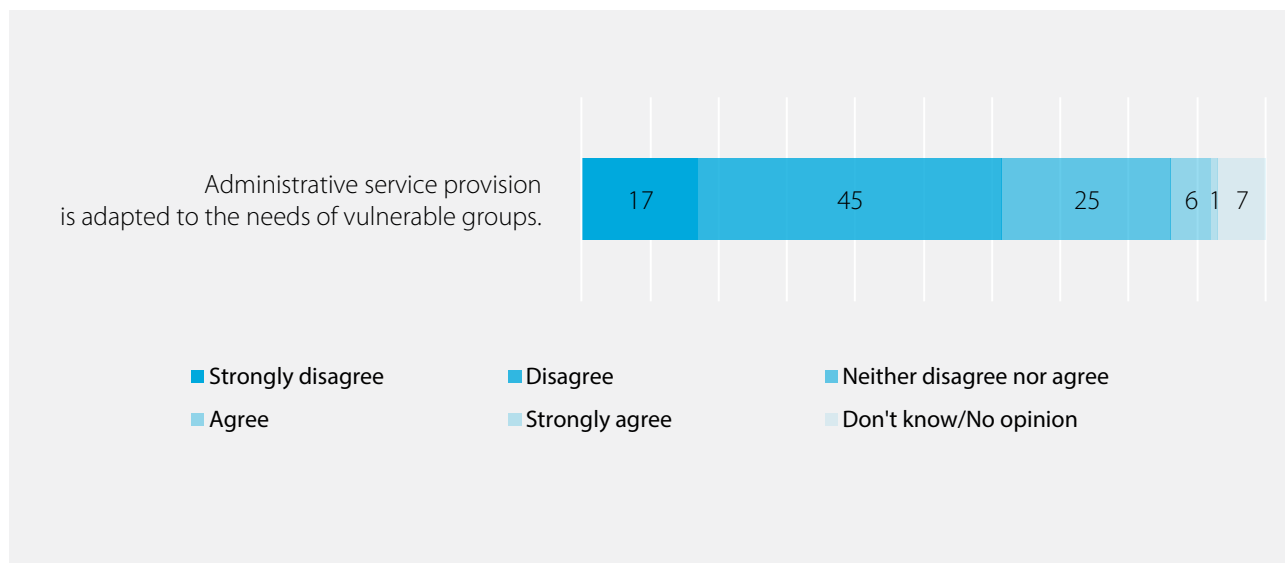
The position of CSOs is similar when it comes to the adaptability of the provision of services to vulnerable groups. 62% of respondents do not think that services are adapted to the needs of the vulnerable, while 31% do not have an opinion on this issue. In addition, the interviewed civil society representatives who deal with the problems of vulnerable groups²⁵⁷, point out that before reaching the area where the service is provided, it is necessary to overcome architectural barriers, both at the entrance to the building and in the interior of the building, because the height of the counters, elevators, and toilets are not accessible. They also point out that even when there are ramps, elevators, and platforms in the facilities, they are intended only for wheelchair users, not for people with walking difficulties. However, according to their testimony, these aids are often not functional, or the administrative staff is not trained in their use. Additionally, difficulties may arise when leaving biometric signatures and fingerprints, as these are not always adapted to those with physical disabilities. In addition to physical inaccessibility, further problems include the lack of positive discrimination when waiting in queues, as well as the lack of information on how and where to get the service. According to the interviewed CSOs, some bodies have information boards, which they see as a positive practice that needs to be more widely present. Nevertheless, both perception and experience from practice still largely suggest a lack of adaptation and accessibility for vulnerable groups.

The survey results further suggest that administrative staff need training on how to provide services to vulnerable people. 63% of CSO representatives believe that civil servants are inadequately trained, which represents an increase of 4 percentage points compared to the 2019/2020 cycle. Consequently, only 2.5% think the opposite (half that of in PAR Monitor 2019/2020), and more than a third of respondents are neutral or cannot answer (34%). Although CSO representatives generally believe that civil servants do not lack sensitivity, but rather that the system needs to be adapted to the needs of different groups, the interviewees still pointed out examples of inconveniences in communication with civil servants, who often turn to speak with personal

²⁵⁷ Interviews with CSO representatives were held on April 27, 28, and May 4, 2023.

assistants or escorts, and not directly to persons with disabilities as beneficiaries.²⁵⁸ Interviewees also held that civil servants lack knowledge on communication with people with visual and hearing impairments.²⁵⁹ To avoid such inconveniences, it is proposed to intensify training for civil servants in the field of service provision.

Chart 44: CSO perception on administrative service provision and 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%. The base for this question was: N =120

Finally, representatives of CSOs show divided attitudes regarding the possibility of choosing a channel for accessing administrative services (in person or electronically). Namely, about a third of those surveyed believe that the administration does not provide such a choice (35%) and that different modes of access are provided (32%). However, when it comes to electronic services, half of the respondents believe that electronic channels are not adapted to vulnerable groups, while 43% do not have a clear position on this issue, answering “neither agree nor disagree” and “I don’t know”.²⁶⁰ Interview participants agree that eGovernment has made it easier to get services for those who are digitally literate but emphasize that this does not cover a large part of vulnerable population.²⁶¹ Nevertheless, they evaluate the eGovernment portal, which has a “read me” option, as accessible, and they commend the introduction of digital signature, the parking sticker service for people with disabilities as a procedure that is available from start to finish on the eGovernment portal, as well as the possibility of electronic scheduling of appointments for getting certain services. However, unclear user tutorials and incomplete information about the required documents on the websites of some service providers, and on the eGovernment portal, are cited as problems that negatively affect e-accessibility.

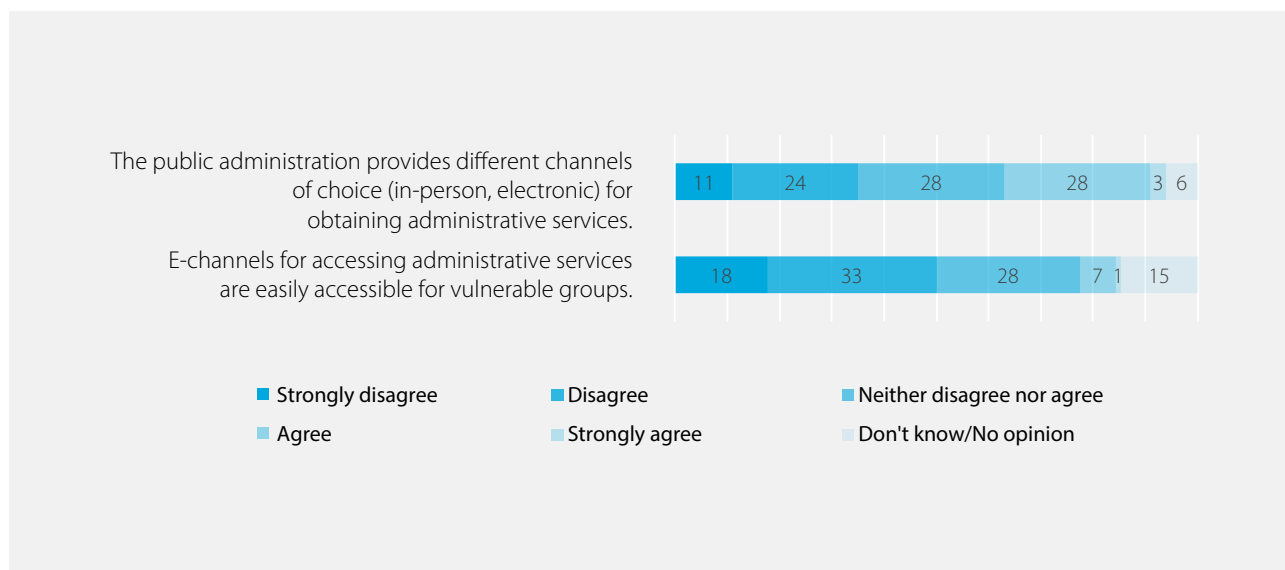
258 Interviews with CSO representatives were held on April 27, 28, and May 4, 2023.

259 Interviews with CSO representatives were held on April 27, 28, and May 4, 2023.

260 A good example of online accessibility customization is the MPALSG website, which contains tools for adjusting font sizes, contrast, brightness, and the like. This tool is available on the home page, see at <https://mduls.gov.rs/> (accessed 24 June 2023).

261 Interviews with CSO representatives were held on April 27, 28, and May 4, 2023.

Chart 45: CSO perception on channels of choice and accessibility of e-services (%)

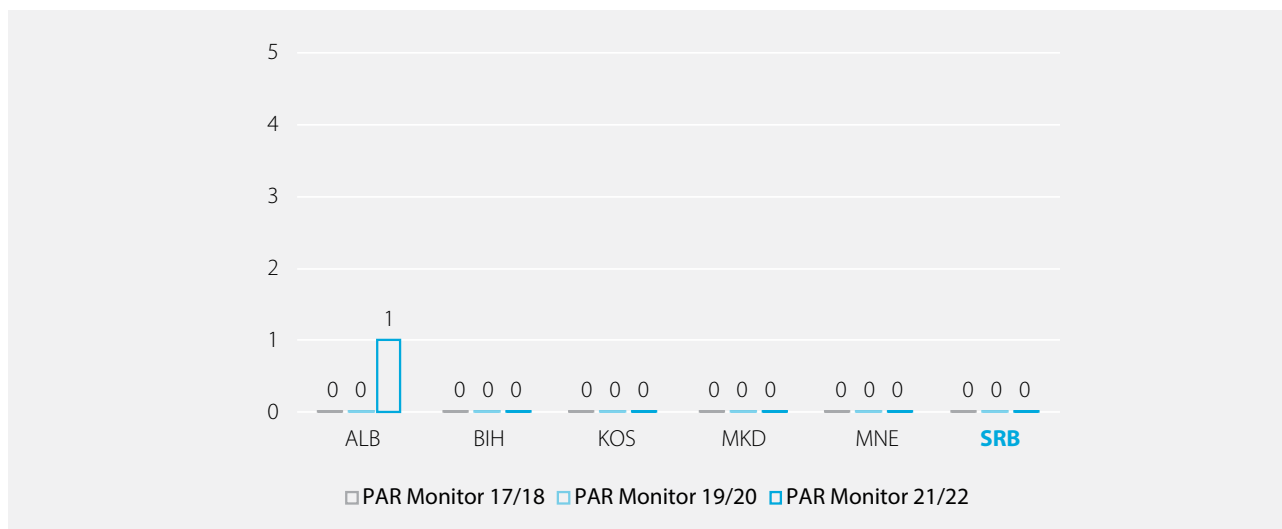


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for this question was N = 120.

In general, a small number of CSO respondents (7.5% or less) have a positive opinion about various aspects of the availability of administrative services for vulnerable groups, and the value of the indicator remains unchanged. In other words, CSOs in Serbia that deal with vulnerable groups do not believe that administrative service providers are adequately territorially distributed and state that administrative services are not provided in accordance with their needs. Moreover, they largely believe that civil servants are not adequately trained to work with vulnerable categories of the population and that the facilities are often unsuitable for people with disabilities. On the other hand, a third of the respondents (32%) confirmed that the administration offers different channels of service provision (e.g., personal, electronic), which is the only exception to the predominantly negative responses.

■ How does Serbia do in regional terms?

Chart 46: Public perception of state administration's citizen orientation



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org.

Table 24: Availability of information regarding the provision of administrative services on the websites of service providers

Indicator elements	Scores 2021/2022	Scores 2019/2020	Scores 2017/2018
E1. Websites of administrative service providers include contact information for the provision of services	4/4	4/4	4/4
E2. Websites of administrative service providers include basic procedural information on how to access administrative services	4/4	4/4	2/4
E3. Websites of administrative service providers include citizen-friendly guidance on accessing administrative services	1/2	1/2	1/2
E4. Websites of administrative service providers include information on the rights and obligations of users	2/2	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
E6. The information on the prices of administrative services differentiates between e-services and in-person services	1/2	1/2	0/2
E7. Information on administrative services is available in open data formats	0/2	0/2	0/2
Total score	16/20	16/20	13/20
Indicator value (scale 0 – 5)²⁶²	4	4	3

The second indicator on accessibility is based on a review of the websites of the five service providers that were analysed in the previous indicators. During the measurement period, in March 2022, the practices of service providers differed depending on the type of information observed, and on the specific provider. Generally speaking, there was no change compared to the previous PAR Monitor 2019/2020, and the high value of the indicator was maintained. Information that is often not readily available online concerns citizen-friendly instructions and guidelines on obtaining services, as well as information on prices and fees.

262 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

Namely, the users of the analysed services can easily find contact details on whom they can turn to for questions. For all five services, providers offer basic contact information (phone and email) and most of them have “information centres”, through which they publish clear descriptions of the type of information these centres can provide, along with opening hours. Contact details for branches or offices throughout Serbia are also usually listed. As in the previous editions of the PAR Monitor, the Business Registers Agency (BRA) continued the good practice of providing contact information for internal organisational units in charge of various issues, while the Ministry of Interior (MoI) has continued to provide contact information for police stations, classified by a municipality, including information on which number to call depending on the service requested.

Not all analysed providers publish basic procedural information, such as a description of services, where and how to get them, and necessary fill-out forms. Thus, citizens who use the services of the MoI (issuance of identity cards and passports, and vehicle registration) cannot find guidelines that can help them during the procedure, while for property registration (registration in the real estate cadastre), company registration, and declaration and payment of VAT, there are such user guidelines. Additionally, the MoI remains an authority that lacks a user-centered approach, while the remaining three authorities (BRA, Republic Geodetic Authority - RGA, and Tax Administration) continue the positive practice of using audio-visual materials that explain the steps necessary to obtain services they offer. For example, on the Tax Administration’s website, one can find user instructions for creating and submitting a VAT return with an overview of the VAT calculation, for displaying data in the calculation overview, and instructions regarding deletion from the records of VAT payers²⁶³. Meanwhile, the YouTube channel of this authority contains video material adapted to citizens for submitting tax returns, but also for other services not covered in this monitoring.²⁶⁴

The review of the internet pages further included whether users could find information about their rights and obligations in relation to the documents and information they need to submit. In other words, whether service providers indicated which specific data or documents the administration should provide *ex officio*, and which citizens would need to obtain and submit themselves. Providers of all five services in the sample report the mentioned information. For example, the BRA provides information and necessary forms for the registration of companies on its website and informs users about the documentation and information that BRA obtains in its official capacity.²⁶⁵ Although the MoI provides similar information for obtaining an identity card and passport online, there is no such information on the eGovernment portal (the portal redirects the user to the page of the Ministry of Interior).

Also, citizens can easily find information on the amount of different fees for services, which is also the last criterion that was found to be fulfilled in the entire sample. On the other hand, pricing information is rarely disaggregated between in-person services and e-services. Only for company registration, and VAT declaration and payment, is this information separated completely, from request to receipt. That is, VAT declarations and payments are made exclusively through the “ePorezi” online application and are free of charge, and for the purposes of registering companies, the BRA clearly compares fees for using the electronic and in-person option. Other services have not been digitized, and therefore the price information is not differentiated, although appointments can be made electronically for obtaining cadastre services and getting passports and identity cards. Also, the RGA states on its website that all documentation in the process of registration in the real estate cadastre is submitted in the form of an electronic document, through the e-counter, except for appeals that are submitted “in paper form”.²⁶⁶ A new development is that, instead of going to four authorities, it is now enough to visit a public notary, who registers a property in the cadastre in the name of the owner.

263 Available at: <https://www.purs.gov.rs/pravna-lica/pdv/uputstvo-za-primenu-pdv.html> (accessed: 20 June 2023).

264 Available at: <https://www.youtube.com/@poreskauprava659> (accessed: 20 June 2023).

265 From May 2023, applications for the establishment of business companies are submitted exclusively electronically, see at: <https://apr.gov.rs/> (accessed: 20 June 2023).

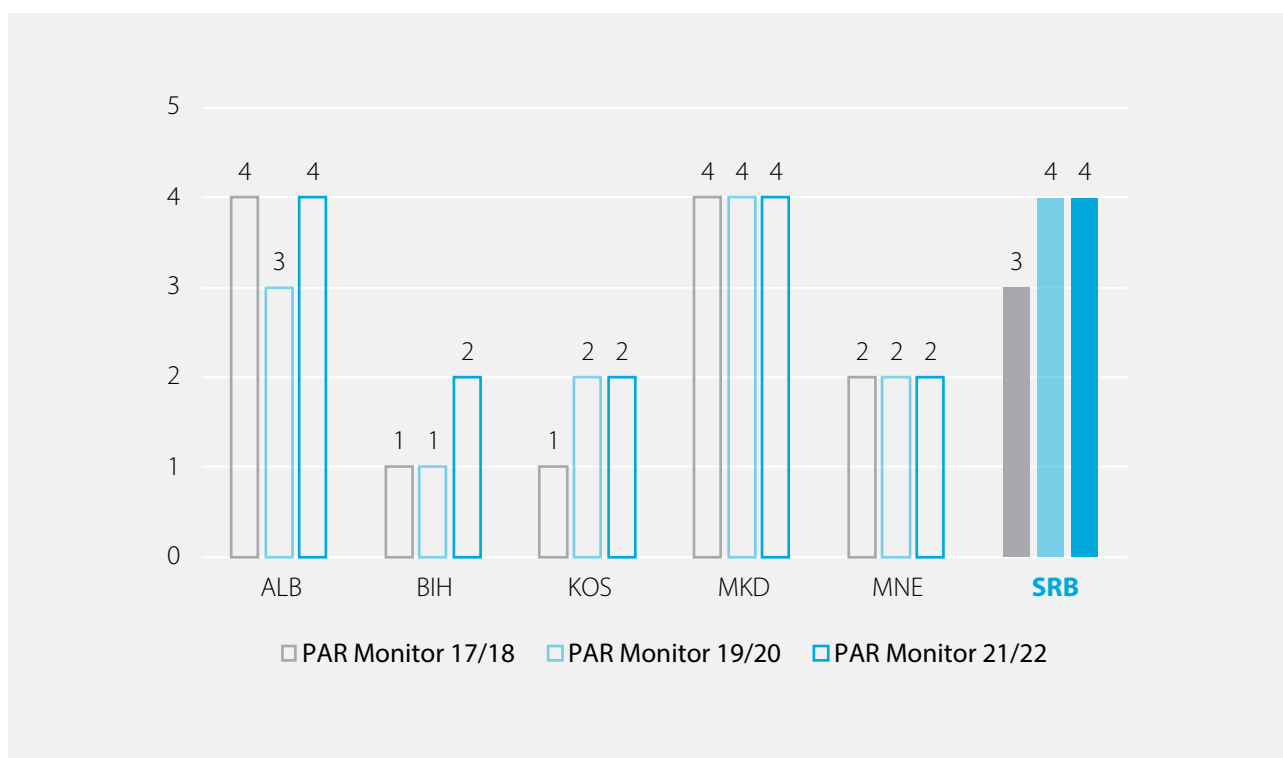
266 Available at: <http://test.upisnepokretnosti.rs/vodic-105> (accessed: 20 April 2023)

Finally, the last element of this indicator analysed whether service providers publish information in a machine-readable format. Despite the legal requirements for the publication of open data, no such practice was identified in this PAR Monitor, either on the websites of the providers of five analysed services or on the open data portal.

As in the previous cycle, the availability of service information online was positively evaluated, and the value of the indicator remains 4. For all five analysed services, providers publish complete information on contacts, location, description of services, fee amounts, as well as on the rights and obligations of users in terms of documentation that needs to be delivered. On the other hand, basic procedural information is not available in all observed cases; for example, the necessary forms are not available for download for the vehicle registration service. Citizen-friendly guidelines, which offer audio-visual content that makes it easier for potential users to access services step by step, were found for three services: property registration, business registration, and VAT declaration and payment. It is important to note that the Ministry of Interior, as the authority responsible for vehicle registration and issuing passports and ID cards, lacks a more user-oriented approach.

■ How does Serbia do in regional terms?

Chart 47: Availability of information regarding the provision of administrative services on the websites of service providers



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org

VI.5 Summary results in the Service Delivery area

The results of the public perception survey showed that citizens' satisfaction with state administration services is high. The findings do not indicate significant differences in relation to regions and the rural-urban distinction. Communication with the administration in the past two years is mostly positively evaluated by citizens - around 68% of them assess that contact with the administration has become easier and that the time needed to obtain services has been shortened. On the other hand, approximately a quarter of citizens do not recognize these improvements, which indicates significant space for improvement. Also, the Government's efforts to simplify administrative procedures are largely visible to citizens (70%), and 90% of them estimate that these efforts are yielding results.

When it comes to e-services, most citizens rate them as easy to use, and progress in this field is shown by almost two-thirds of citizens who claim that they completed the entire service online, from request to receipt, every time they access administrative services electronically. Still, a high percentage of people over 60 years are not informed about digital channels (60%), while a third of the population between 45 and 60 years are not familiar with them. Moreover, less than 60% of respondents are of the opinion that the administration asks them for feedback on how administrative services can be improved, and over 90% of those who believe so claim that the government used their input.

On the other hand, for the third monitoring cycle in a row, CSOs in Serbia express dissatisfaction when it comes to the accessibility of administrative services. They continue to point to the inadequate territorial distribution of providers, but also to the insufficient accessibility of administrative services to vulnerable groups, primarily due to inadequate training of civil servants to work with these categories of the population. When it comes to the choice of channels for access, the opinions are divided. A third of the respondents (32%) believe that the public administration offers users the possibility of choosing different channels, slightly more than a third (35%) that such a possibility is absent, and 28% of respondents do not have an opinion. Regarding the adaptation of electronic channels to vulnerable groups, half of the CSOs (50%) point out these are not adapted, and 43% of them do not have an opinion on this aspect of service provision.

Finally, the public availability of information on obtaining administrative services online remains at a satisfactory level, although practices still vary by type of information and provider. Users of the analysed services can easily find details about whom to contact, what documentation needs to be submitted, and what the fee amounts are. In addition, all of the authorities publish on their websites data on the rights and obligations of users regarding the documents and information that must be submitted, as well as which information/data the authorities obtain themselves. On the other hand, the availability of complete and up-to-date procedural information on how to obtain services can still be improved. Also, citizen-friendly guidelines are not available for the entire sample, and not all services are digitized despite individual improvements, such as in the case of real estate registration and VAT registration - RGA through the e-counter allows users to submit a request and communicate electronically, while the "ePorezi" portal enables submission of electronically signed tax declaration forms, monitoring the status of sent returns, insight into the taxpayer's accounts, etc. For certain services, the eGovernment portal still offers only the option to schedule appointments for getting them at the authorities' premises.

VI.6 Recommendations for Service Delivery

Tracking recommendations from PAR Monitor 2019/2020

Colour coding scheme for tracking recommendations

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Recommendation	Status	Comment
1. One-stop shops, existing ones or new, should also incorporate direct user feedback on the quality of the service.	No action taken	The Government still has not adopted the decree on one-stop shops, so there is no obligation to incorporate direct user feedback on the quality of the service. Also, there is no evidence that any of the currently operational one-stop shops are doing so.
2. Service providers' websites and the eGovernment portal should ensure feedback channels for users by default. Users should have an opportunity to elaborate on their experience, what aspects they were satisfied or dissatisfied with, through more developed yet citizen-friendly options.	No action taken	The eGovernment portal does not provide the possibility to provide feedback on services. Some institutions, such as the Tax Administration, survey users through their web pages, but this is not a standard practice. ²⁶⁷
3. Public administration service providers should proactively publish feedback results and data (either raw or processed and analysed) to the public, at least on an annual basis, and easily accessible through their websites. Public availability of feedback will in turn serve to increase the accountability for and transparency of service provision.	No action taken	The practice is not uniform across the administration, and it relies on proactivity and transparency of individual institutions. Tax Administration does not provide results of its surveys.
4. In addition to publishing feedback results, service providers should make it clear how this data was used for adjustments and for curbing or eliminating causes of dissatisfaction.	N/A	Since there is no evidence that service providers publish feedback results, there is no available information on whether such feedback was used and how.

²⁶⁷ Available at: <http://bitly.ws/B7ao> and <http://bitly.ws/B7aq> (last accessed 3 March 2023).

<p>5. Service providers should invite and encourage users to send improvement proposals themselves. Collected either online, or at the premises of service providers (or both), the results of these proposals need to be reported to the public to secure credibility of such initiatives and maintain public trust in the service-orientation of the government. The channels for submitting such proposals should be distinct from the general commenting/complaint sections of the websites.</p>	<p>No action taken</p>	<p>A review of the websites of selected state administration bodies found that service providers do to encourage users to send their proposals for improvement services. The Republic Geodetic Authority has a section on the website which allows citizens to leave their remarks on its work, but its main purpose is not gathering feedback which would help improve the quality of services.²⁶⁸</p>
<p>6. The decree regulating webpages of public authorities should prescribe an obligation to incorporate user feedback channels within the "Services" section of webpages and promote such channels on the homepage banners.</p>	<p>No action taken</p>	<p>The Regulation on Closer Conditions for Creation and Maintenance of Web Presentation of Authorities does not prescribe any obligation for public authorities to incorporate user feedback channels within the "Services" section of webpages or to promote such channels on the homepage banners. During the time of writing this report, no amendments to the Regulation were adopted, which would prescribe such an obligation.</p>
<p>7. Independent agency for monitoring, control and management of service quality, planned under the PAR Strategy Action Plan 2021-2025, should have the central authority for the entire service delivery policy, with clearly defined responsibilities and methods of coordination and cooperation with individual service providers. The agency should take the overall responsibility for setting standards in service delivery and monitoring compliance.</p>	<p>Initiated</p>	<p>According to the PAR Strategy AP 2021-2025, the agency for monitoring, control and management of service quality is supposed to be established in 2025.²⁶⁹</p>
<p>8. NAPA trainings for employees who are in direct contact with service users (with special focus on users with special needs), planned under the PAR action plan 2021-2025, should be fully implemented to cover all the staff communicating with service users.</p>	<p>N/A</p>	<p>According to NAPA's yearly evaluations of training programmes in 2021 and 2022, a number of trainings were held on service delivery, but mostly related to e-services. In 2021, there were 9 training programmes, but there was a significant increase in 2022 when 135 training programmes were organised. Still, based on the evaluations alone it is not possible to determine whether there were trainings which focused on contact with persons with disabilities.²⁷⁰</p>
<p>9. The government should develop and implement a general methodology for measuring satisfaction of service users at a systemic level and in a standardized way, so that all institutions providing services, as well as the eGovernment Portal, establish and widely promote advanced feedback channels, easily accessible, and easy to use.</p>	<p>No action taken</p>	<p>There are no documents available on the websites of the Government, MPALSG or the Office for IT and eGovernment, which would indicate that there is a general methodology for measuring satisfaction of service users.</p>

268 Available at: <http://bitly.ws/B7aV> (last accessed 3 March 2023).

269 PAR Strategy Action Plan 2021-2925, available at: <http://bitly.ws/B7b9> (last accessed 3 March 2023).

270 Available at: <http://bitly.ws/B67T> (last accessed 3 March 2023).

<p>10. Based on the implementation of the methodologies for measuring performance of service providers and satisfaction of users (foreseen by the PAR Action Plan 2021-2025), the Government should develop and publish an online performance dashboard on the overall public service provision in Serbia. The dashboard could include parameters such as service completion rates, digital take-up rates, and information on user satisfaction.</p>	<p>Initiated</p>	<p>There is no online performance dashboard available on the Government's website. However, the recommendation states that such a tool should be developed based on the implementation of the methodologies for measuring the performance of service providers and satisfaction of users foreseen by the PAR Action Plan 2021-2025. The methodologies were supposed to be developed by the end of 2022 by the Ministry of Public Administration and Local Self-Government, but there is no draft nor a final version of these documents available online.</p>
<p>11. The government should adopt and apply clear criteria for the establishment of one-stop-shops, paying particular attention to accessibility standards in their functioning.</p>	<p>No action taken</p>	<p>The Government did not adopt a regulation regarding the criteria for establishing one-stop shops. Although Article 42 of the Law on General Administrative Procedure does describe the jurisdiction of one-stop shops when it comes to service provision, it also foresees that the Government is in charge for setting the conditions for establishing them.²⁷¹</p>
<p>12. The Office for IT and eGovernment should proactively seek user feedback on the redesigned portal, report on the results of such feedback and actions taken based on it.</p>	<p>No action taken</p>	<p>There is no evidence available that the Office for IT and eGovernment seeks feedback from citizens on the redesigned eGovernment portal. Also, there is no section on the eGovernment portal that allows citizens to provide feedback.</p>
<p>13. For better user experience, the eGovernment Portal should include more visual guidance through specific services and maps of the entire user journey through the service.</p>	<p>Partially implemented</p>	<p>The eGovernment portal provides video instruction on obtaining certain services, such as parking spaces for persons with disabilities. There are also step-by-step infographics for services such as the issuance of a qualified electronic certificate in the cloud and biomedical aided fertilisation. Still, these types of instructions are not available for every service on the Portal.</p>
<p>14. The Office for IT and eGovernment should fulfil the requirement stipulated in article 13 paragraph 3 of the decree regulating development and maintenance of websites of public authorities, and regularly publish the report on the compliance of public authorities with the decree.</p>	<p>No action taken</p>	<p>Such reports are not available on the website of the Office.</p>
<p>15. The government should develop a rulebook on using plain language in written and verbal communication with users of public services, with clear rules on clarity, simplicity, and user-friendly content.</p>	<p>No action taken</p>	<p>There is no rulebook on this matter developed by the Government.</p>

271 Law on Administrative Procedure, available at: <http://bitly.ws/B7bF> (last accessed 3 March 2023).

PAR Monitor 2021/2022 recommendations

A certain number of the recommendations from the 2019/2020 PAR Monitor, still relevant in this monitoring cycle, are repeated and some of them have been slightly modified, either to make them more relevant to the somewhat changed legal framework or simply to make them clearer and more specific.

Repeated and modified recommendations from PAR Monitor 2019/2020

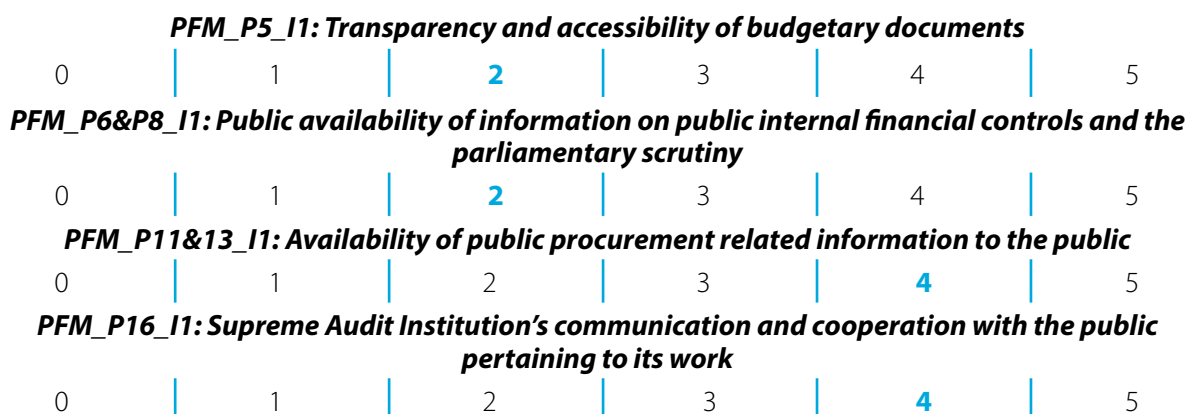
1. One-stop shops, existing ones or new ones, should also incorporate direct user feedback on the quality of the service.
2. Service providers' websites and the eGovernment portal should ensure feedback channels for users by default. Users should have an opportunity to elaborate on their experience, and what aspects they were satisfied or dissatisfied with, through more developed yet citizen-friendly options.
3. Public administration service providers should proactively publish feedback results and data (either raw or processed and analyzed) to the public, at least on an annual basis, and easily accessible through their websites. Public availability of feedback will in turn serve to increase the accountability for and transparency of service provision.
4. In addition to publishing feedback results, service providers should make it clear how this data was used for adjustments and for curbing or eliminating causes of dissatisfaction.
5. Service providers should invite and encourage users to send improvement proposals themselves. Collected either online, or at the premises of service providers (or both), the results of these proposals need to be reported to the public to secure the credibility of such initiatives and maintain public trust in the service orientation of the government. The channels for submitting such proposals should be distinct from the general commenting/complaint sections of the websites.
6. The decree regulating webpages of public authorities should prescribe an obligation to incorporate user feedback channels within the "Services" section of webpages and promote such channels on the homepage banners.
7. NAPA training for employees who are in direct contact with service users (with a special focus on users with special needs) should be conducted to include all employees who communicate with service users.
8. The government should develop and implement a general methodology for measuring the satisfaction of service users at a systemic level and in a standardized way, so that all institutions providing services, as well as the eGovernment Portal, establish and widely promote advanced feedback channels, easily accessible, and easy to use.
9. Based on the implementation of the methodologies for measuring the performance of service providers and satisfaction of users (foreseen by the PAR Action Plan 2021-2025), the Government should develop and publish an online performance dashboard on the overall public service provision in Serbia. The dashboard could include parameters such as service completion rates, digital take-up rates, and information on user satisfaction.
10. The government should adopt and apply clear criteria for the establishment of one-stop shops, paying particular attention to accessibility standards in their functioning.
11. The Office for IT and eGovernment should proactively seek user feedback on the redesigned portal, and report on the results of such feedback and actions taken based on it.
12. For a better user experience, the eGovernment Portal should include more visual guidance through specific services and maps of the entire user journey through the service.
13. The Office for IT and eGovernment should fulfill the requirement stipulated in Article 13 paragraph 3 of the decree regulating the development and maintenance of websites of public authorities and regularly publish the report on the compliance of public authorities with the decree.
14. The government should develop a rulebook on using plain language in written and verbal communication with users of public services, with clear rules on clarity, simplicity, and user-friendly content.

VII.

PUBLIC FINANCIAL MANAGEMENT



VII.1 WeBER indicators used in public financial management and country values for Serbia



VII.2 State of play in Public Financial Management and main developments since 2020

■ Budget transparency

In the 2021 Report on the Implementation of the Public Finance Management Reform Programme for 2021-2025, the Ministry of Finance reflects on the insufficient budget transparency and recognises the need for timely publishing budget execution report, along with the need to further improve the efficiency and effectiveness of reporting in accordance with the best international practice.²⁷² Even though one of the Programme's specific objectives is to improve budget discipline and enable more transparent use of public funds, the Report does not contain any specific indicators on budget transparency, meaning that developments in this area are vaguely described with no specific data.

The European Commission noted that Serbia has not progressed in improving budget transparency as the transparency roadmap, pre-budget statement, and mid-year report have not yet been produced or published.²⁷³ The EC stated that the 2022 budget had a very limited qualitative assessment and debate among the stakeholders, and emphasised that public participation in the budget process and legislative oversight must be improved.²⁷⁴

The Open Budget Survey ranks Serbia 59th out of 120 countries in 2021 regarding budget transparency. In 2021, Serbia had a budget transparency score of 46 out of 100, an improvement compared to 2019, when the score was 40. The increase in score can be attributed to the fact that the year-end report was published online.²⁷⁵

■ Public internal financial control (PIFC)

The reporting rate for financial management and control (FMC) has increased compared to the previous practice. According to the Consolidated Annual Report on PIFC of the Central Harmonisation Unit (CHU) for 2021, almost 100% of the total revenues of state-owned enterprises (SOE) came from SOEs at the central level of government, and they all submitted their reports on FMC system.²⁷⁶ The cities that submitted the FMC report manage 97% of the total expenditures of the city budgets, while the municipalities that submitted the report manage 83%

272 Ministry of Finance, Report on the implementation of the Public Finance Management Reform Programme 2021-2025 for the year 2021, p. 84. Available at: https://www.mfin.gov.rs/upload/media/iSlSql_62612e2c1ea88.pdf (accessed 4 April 2023)

273 European Commission, Serbia 2022 Report, p.16. Available at: <http://bitly.ws/zxzQ> (accessed 4 April 2023)

274 Ibid.

275 Open Budget Survey Serbia 2021, available at: <http://bitly.ws/zAFq> (accessed 4 April 2023)

276 Consolidated Annual Report for 2021 on the state of Public Internal Financial Control in the Public Sector, p.5. Available at: https://www.mfin.gov.rs/upload/media/6jh9Z7_6336a07d4be6f.pdf (accessed 4 April 2023)

of the total expenditures of the municipal budgets.²⁷⁷ The report states that over 83% of budget users from the central government level, social security organisations, the autonomous province of Vojvodina, cities, and SOEs have a functional internal audit in place, but also recognises the problem of insufficient personnel qualified to perform an internal audit.²⁷⁸

Similarly, the EC states that internal control and internal audit procedures are broadly in line with international standards. However, internal audit recommendations need to be implemented in a timely manner, and not all institutions that are required to establish an internal audit unit have done so.²⁷⁹ The capacities to implement internal control standards, including risk management, “must be further enhanced at both central and local government and better accepted in the administrative culture of the public sector”.²⁸⁰ It is worth noting that after more than ten years of implementation of the PIFC legislation, an analysis of the adequacy of the PIFC arrangement is envisaged under the new PFM Reform Programme.²⁸¹

■ Public procurement transparency

As mentioned in the previous PAR Monitor, major changes in the public procurement policy came in 2019 with the adoption of the new Law on Public Procurement and the Public Procurement Development Programme for 2019-2023 with a two-year action plan. In the 2021 Annual Report on the Implementation of the Programme, the Public Procurement Office (PPO) reflected that all of the bids submitted in 2021 were submitted on the Portal, which amounted to over 89,000 bids (27,000 in 2020).²⁸² On the other hand, the European Commission pointed out that the proportion of negotiated procedures without prior publication stood at 7.7 % of the total value of contracts concluded in 2021.²⁸³ The average number of bids for each public procurement procedure decreased from 2,6 in 2020 to 2,5 in 2021, but the PPO stated that this is a consequence of the frequent participation of groups of bidders in public procurement procedures.²⁸⁴

Despite this, the transparency of public procurement is still undermined by the law on special procedures for linear infrastructure projects, which allows the government to exempt linear infrastructure projects of ‘special importance for the Republic of Serbia’ from the application of public procurement rules, leading to a lack of clear selection procedures and transparency. The EC stated that the exemptions from applying the public procurement law accounted for 67% of the cumulative value of all public procurement contracts concluded in 2021.²⁸⁵ The most frequently used legal basis for exemption were intergovernmental agreements which accounted for 22.7 % of the total value of exemptions in 2021.²⁸⁶

■ External communication of the external audit

As stated in the previous PAR Monitor, the State Audit Institution (SAI) prioritises external communication in its Strategic Plan for 2019-2023. SAI has continued publishing annual activity reports and an annual registry of recommendations. It has also continued to increase the impact of its audit work by improving the monitoring of the implementation of its recommendations, cooperation with stakeholders, overall transparency of its work, and increasing its communication with the media.²⁸⁷ In 2021, the National Assembly once again reviewed SAI’s annual activity reports, after which it adopted a Conclusion recommending that the Government acts within its competencies in order to ensure that the SAI’s recommendations are implemented.²⁸⁸ According to SIGMA,

277 Ibid.

278 Ibid, p. 6-7.

279 European Commission, Serbia 2022 Report, p.84.

280 Ibid.

281 Ibid, p. 83.

282 Report on the implementation of the Action Plan for the implementation of the Public Procurement Development Programme for the year 2021, p. 8, 12. Available at: <https://www.ujn.gov.rs/strategija/izvestaj-2021/> (accessed 4 April 2023)

283 European Commission, Serbia 2022 Report, p. 79.

284 Report on the implementation of the Action Plan for the implementation of the Public Procurement Development Programme for the year 2021, p. 12.

285 European Commission, Serbia 2022 Report, p. 79.

286 Ibid, p. 80.

287 European Commission, Serbia 2022 Report, p. 84.

288 Ministry of Public Administration and Local Self-Government, *Annual Report for 2021 on the implementation of the Public Administration Reform Strategy for 2021-2030*, p.58. Available at: <http://bitly.ws/zrC> (accessed 4 April 2023)

the increased transparency of the SAI's work through its website and engagement with civil society has also contributed to improving its impact.²⁸⁹

Furthermore, the Open Budget Survey for 2021 rated the audit oversight over budget as adequate, scoring 83 out of 100, the same as in 2019.²⁹⁰ On the other hand, when it comes to the perception of the public, according to Balkan Barometer Survey for 2022, around 52% of citizens in Serbia totally disagree or tend to disagree with the statement that the SAI is independent of political influence. Meanwhile, opinions are divided on the matter of SAI's possibility to effectively scrutinise the government and make it accountable to citizens, as around 43% of citizens totally agree or tend to agree with this statement, while around 45% of them disagree.²⁹¹

VII.3 What does WeBER monitor and how?

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 these principles are thoroughly assessed by SIGMA, WeBER focuses and enhances elements of the transparency and accessibility of information, external communication, as well as proactive and citizen-friendly approaches to informing citizens.

As an additional development since the baseline monitoring, a new indicator was developed to cover the public procurement sub-area of PFM (SIGMA Principles 11 and 13), which was not monitored in the first cycle. As a result, four indicators were measured in this PAR Monitor edition. With this addition, WeBER researchers monitored public procurement policy for the first time, along with annual budget policy, PIFC, and external audits. As it was measured for the first time, the indicator on public procurement in this PAR monitor edition sets baseline values in this area.

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, as well as 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, as well as official government portals and open data portals.

²⁸⁹ SIGMA, *Monitoring Report for Serbia*, 2021p. 174, available at: <https://www.sigmaxweb.org/publications/Monitoring-Report-2021-Serbia.pdf> (accessed 4 April 2023)

²⁹⁰ Open Budget Survey Serbia 2021.

²⁹¹ Balkan Barometer 2022 – Public opinion, p. 125-127. Available at: <https://www.rcc.int/balkanbarometer/publications> (accessed 4 April 2023)

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, while official parliamentary documentation is used 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 the existence of strategic approaches, means of communication used, citizen-friendliness of audit reporting, the existence of 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 with 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 authorities and key contracting authorities publish annual plans and reports, as well as 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 as well as the percentage of public procurement processes done in open procedures. This indicator is entirely based on review of official documentation on public procurement policy.

VII.4 WeBER monitoring results

Principle 5: Transparent budget reporting and scrutiny are ensured

Table 25: Transparency and accessibility of budgetary documents

Indicator elements	Score 2021/2022	Score 2019/2020	Score 2017/2018
E1. Enacted annual budget is easily accessible online	2/4	4/4	4/4
E2. In-year budget execution reports are easily accessible online	2/4	2/4	2/4
E3. Mid-year budget execution reports are easily accessible online	0/4	0/4	0/4
E4. Budget execution reports (in-year, mid-year, year-end) contain data on budget spending in terms of functional, organisational, and economic classification	0/4	0/4	0/4
E5. Annual year-end report contains non-financial information about the performance of the Government	2/2	0/2	0/2
E6. Official reader-friendly presentation of the annual budget (Citizen Budget) is regularly published online	4/4	4/4	4/4
E7. Budgetary data is published in open data format	2/2	2/2	2/2
Total score	12/24	12/24	12/24
Indicator value (scale 0 – 5)²⁹²	2	2	2

292 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.

When it comes to budget transparency, the general situation in this area remained unchanged compared to the previous cycle, despite changes in certain aspects of monitoring the application of this principle. The ease of access to the adopted annual budget was rated as partial in this cycle, given that at the time of monitoring, only the current Law on the Budget for 2022 was available three clicks from the home page of the Ministry of Finance (MoF) website (which is defined as “easily accessible”), this was not the case with the budget for 2021, which was available in the archive. In addition, the MoF has stopped the practice of making the current budget available already on the home page and is currently located in the section dedicated to regulations.²⁹³

Reports on the execution of the budget during the year are available on a monthly basis, as in the previous period, in the form of the Public Finance Bulletin, which also contains information on macroeconomic and fiscal parameters. Despite the fact that the bulletins are available less than three clicks from the homepage of the MoF website, during the monitoring cycle it was determined that they are not published regularly and timely, which affected the assessment of this element.²⁹⁴ On the other hand, mid-year reports on budget execution have not been publicly available since the beginning of the implementation of PAR Monitor, which represents one of the biggest shortcomings in this area.

Regarding the type of data that is disclosed in the publicly available reports on budget execution, the data contained in the Public Finance Bulletins is classified only by economic categories, i.e., the type of expenditure. Meanwhile for the mid-year reports, data breakdown was impossible to determine due to unavailability. On the other hand, the annual reports on the execution of the budget, as part of the final account, last available during the monitoring cycle for 2020, contain fully classified data, i.e., by economic, organizational, and functional classification.²⁹⁵

The annual report also contains non-financial information on the Government’s performance, which represents a significant improvement in the transparency of public finances compared to previous monitoring cycles. It reveals performance data based on programme budget elements expressed by policy sectors, beneficiaries, and programmes. Such data can be found for all 24 sectors, as well as non-financial information on performance for most state administration bodies at the central level of government. In this field, the biggest step forward was made in this edition of PAR Monitor.

The good practice from previous years was continued in terms of adapting and publicising budget data to citizens. The citizen guides through the budget are available on the Ministry’s website for several fiscal years. However, it should be emphasized that similar to the case of the Budget Law, the Citizen Budget for 2022 is available in one section of the MoF website, while the ones for 2021 and 2019 are in the archive, and there was a break in 2020 since the similar guide was not published.²⁹⁶ In general, despite the use of different online locations and sporadic interruptions in publication, citizen guides have been published continuously since the beginning of the implementation of PAR Monitor.

Finally, it should be noted that investing additional efforts toward the implementation of the open data policy is still necessary. Despite publishing data in open formats and the maximum points on this issue, the Ministry does not share open budget data on the Open Data Portal, nor does it mark and standardise the data available on its website as open. On the other hand, the Portal does contain information on revenues and expenditures of local governments, which is an example of good practice that should be followed for the central-level budget too.²⁹⁷

293 The 2022 Budget Law is available at: <http://bitly.ws/Cvvaq> The 2021 Budget Law is available at: <http://bitly.ws/Cvaw> (accessed April 3, 2023)

294 Under regularity, in the case of monthly reports, it was observed whether they were available for the previous 6 months in relation to the measurement period (August 2022). Bulletins are available at: <http://bitly.ws/B7d7> (accessed April 4, 2023)

295 The 2020 Budget Final Account Law is available at: <http://bitly.ws/Cy76> (accessed 4 April 2023)

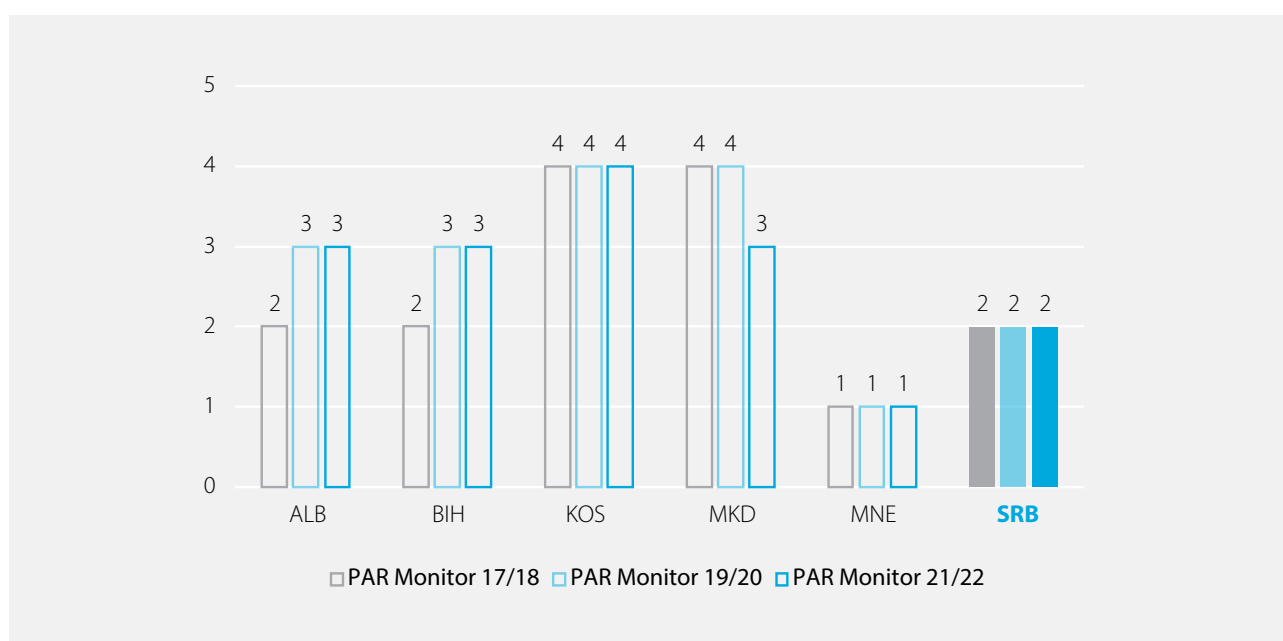
296 The 2022 Civic Budget is available at: <http://bitly.ws/CynZ>. Previous versions of this guide are available at: <http://bitly.ws/B7dx> (accessed 4 April 2023)

297 Data available at: <http://bitly.ws/CDKd> (accessed 6 April 2023)

The results of this monitoring cycle show that despite changes in certain elements, the final value of the indicator remained the same as in previous editions. The level of transparency of budget documents remained relatively low, primarily due to the nontransparency of mid-year reports on budget execution, as well as the fact that the most common type of data that is publicly available is related to the economic classification of expenditures, and rarely by budget users and functions of the Government. On the other hand, progress has been noted when it comes to the data contained in the annual budget execution reports, as they now provide non-financial information on the Government's performance. However, with a change in the online accessibility of the budget laws, the overall score remained unchanged. Finally, although a large amount of data is available on its website, the Ministry of Finance should follow the examples of local governments that publish data on their budgets on the Open Data Portal and do the same for state-level finances.

■ How does Serbia do in regional terms?

Chart 48: Transparency and accessibility of budgetary documents



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org.

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

Table 26: Public availability of information on public internal financial controls and the parliamentary scrutiny

Indicator elements	Score 2021/2022	Score 2019/2020	Score 2017/2018
E1. Consolidated annual report on PIFC is regularly produced and published online	4/4	2/4	2/4
E2. Quality reviews of internal audit reports are regularly produced and published online	1/2	1/2	2/2

E3. Ministries publish information related to financial management and control	1/2	0/2	0/2
E4. CHU proactively engages with the public	0/2	0/2	0/2
E5. The Parliament regularly deliberates on/reviews the consolidated report on PIFC	0/2	0/2	0/2
Total score	6/12	3/12	4/12
Indicator value (scale 0 – 5)²⁹⁸	2	1	1

Compared to the previous monitoring cycle, progress was noted when it comes to the timely publication of consolidated annual reports on PIFC and information on financial management and control (FMC) carried out by ministries. Consequently, the value of the indicator increased for the first time in this area.

Namely, consolidated annual reports on PIFC are regularly prepared and published on the website of the Ministry of Finance in the section dedicated to the Central Harmonization Unit (CHU), where reports from 2009 to 2021 are available.²⁹⁹ Considering that the reports for the previous two calendar years at the time of monitoring (2020 and 2021) were available, this element was assessed with the maximum number of points. However, the CHU continues the practice of publishing these reports mostly at the end of the current year for the previous one. As there is no legally prescribed deadline within which these reports must be published, it is estimated that reporting is done regularly.

In addition, ministries' practice of publishing information on FMC has somewhat improved. In this cycle, eight of the 21 ministries of the Government convocation from October 2020 to October 2022, made publicly available at least one of the three observed sets of data related to the FMC: information on risk registers, book of procedure (map of business processes), and on designated persons responsible for the FMC.³⁰⁰ However, none of the eight ministries published all three pieces of information.

Regarding internal audit quality reviews, there was no progress regarding the regularity of their preparation and publication. The CHU started publishing these reports in 2016; however, the one for 2021 had not been published at the of monitoring, and the last one available was for 2020.³⁰¹ The structure of the report is identical to the first report published on this topic, following a strictly bureaucratic style of presenting the results of quality reviews.³⁰² Additionally, the CHU representatives rarely used different channels to communicate developments and results in PIFC to the public. During 2022, the only public information tool that was used were media appearances, which were mainly devoted to the lack of human resources for the implementation of internal audit, and FMC trainings.³⁰³

Finally, when it comes to parliamentary consideration of consolidated reports on PIFC, the assessment remained unchanged compared to previous cycles. Although there is no formal obligation to submit these reports to the National Assembly for consideration, there is no evidence that anything similar took place in practice within the available documents and minutes, including the sessions of the Committee for finance, the republic budget, and the control of the spending of public funds, during 2021 or 2022.

298 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.

299 The reports are available at: <http://bitly.ws/CFCK> (accessed April 7, 2023)

300 The information was published by the following ministries: Ministry of Construction, Transport and Infrastructure, Ministry of Economy, Ministry of Agriculture, Forestry and Water Economy, Ministry of Public Administration and Local Self-Government, Ministry of Education, Science and Technological Development, Ministry of Labour, Employment, Veterans and Social Affairs, Ministry of Culture and Information and Ministry of Rural Welfare. Two cabinets of ministers without portfolios were excluded from the research.

301 CHU, in the meantime, also published the report for 2021 and it is available on the MoF website.

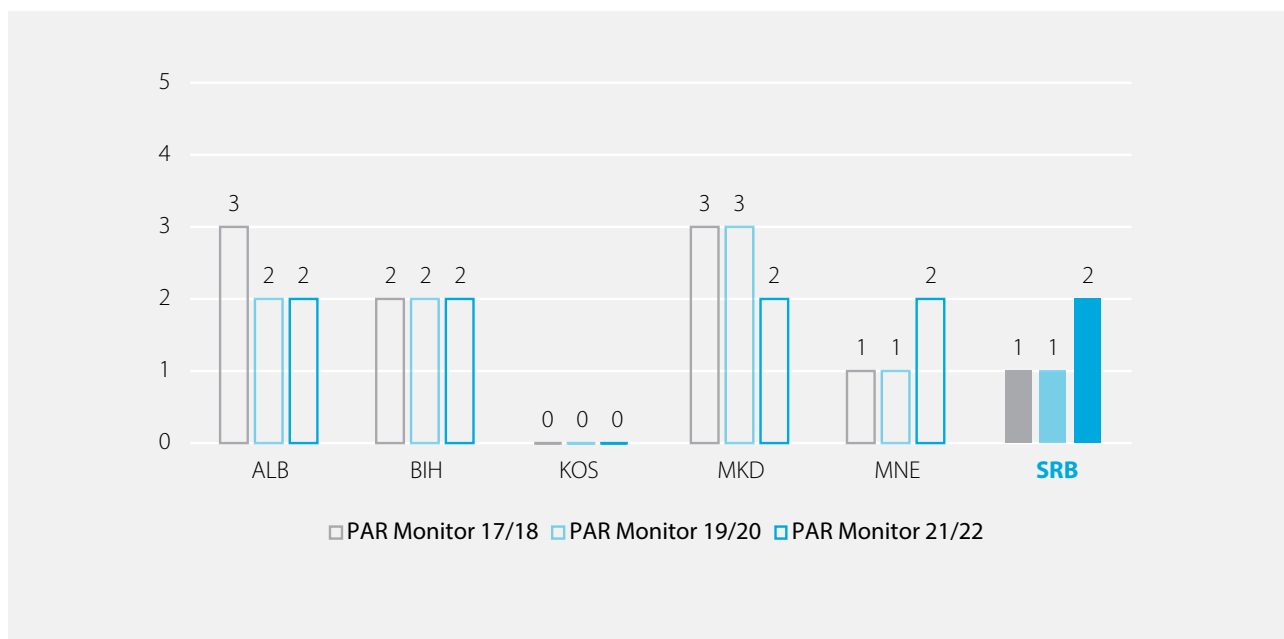
302 The reports are available at: <http://bitly.ws/CG2K> (accessed 7 April 2023)

303 See more at: <http://bitly.ws/CGd8> and <http://bitly.ws/CGdd> (accessed 7 April 2023)

Some progress in this area is due to the regular publication of consolidated annual reports on the PIFC, and information on the FMC by ministries, resulting in an increase of the indicator value from 1 to 2. On the other hand, the regularity of the publication of reports on the internal audit quality reviews is partial, while practices of public informing on the state of the PIFC is still insignificant. The National Assembly does not consider consolidated reports on the PIFC, either at the plenary or during the competent committee sessions.

■ How does Serbia do in regional terms?

Chart 49: Public availability of information on public internal financial controls and the parliamentary scrutiny



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org.

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

Table 27: Availability of public procurement related information to the public

Indicator elements	Score 2021/2022	Score 2019/2020
E1. Central procurement authority regularly reports to the public on the implementation of overall public procurement policy	4/4	4/4
E2. Central review body regularly reports to the public on procedures for the protection of rights of bidders in public procurement	2/4	2/4
E3. Reporting on public procurement by the central procurement is citizen-friendly and accessible	1/2	1/2
E4. Public procurement portal is user-friendly	2/2	2/2

E5. Central-level contracting authorities regularly publish annual procurement plans	4/4	0/4
E6. Central-level contracting authorities regularly publish annual procurement reports	0/4	0/4
E7. Central procurement authority publishes open procurement data	2/2	2/2
E8. Open and competitive procedures are the main method of public procurement	4/4	2/4
Ukupno bodova	19/26	13/26
Indicator value (scale 0 – 5)³⁰⁴	4	2

Significant progress was noted in the availability of information on public procurement in this monitoring cycle. The Public Procurement Office (PPO), as the institution responsible for monitoring this area, continued to regularly publish annual reports on public procurement. The reports prepared until 2019 are available on the PPO website, while the reports for 2020 and 2021 are available on the Public Procurement Portal.³⁰⁵ In addition, annual reports of the individual contracting authorities are available on the Portal as well.³⁰⁶ The Republic Commission for the Protection of Rights of Bidders in Public Procurement Procedures publishes annual reports on its work from 2012 to 2020; however, the report for 2021 was not available during the monitoring period, so this element, as in the 2019/2020 cycle, was assessed as partially met.³⁰⁷

The PPO's reporting method can still be assessed as only partially accessible and adapted to citizens, given that the annual reports do not contain simply written summaries of the main outcomes achieved during the reporting period. On the other hand, all reports contain visual presentations of the key performance indicators of public procurement and are easily accessible from the homepage of the Portal. In this regard, the approach to reporting to the public remains unchanged, except for the fact that due to the new legal framework in 2019, the structure of the annual reports has been modified to present the performance of implemented procedures carried out under the old and new framework.

The Portal was assessed as user-friendly. As in the previous cycle, it was determined that the Portal enables five out of six analysed functions: it does not require user registration in order to access documentation on procedures; access to documentation is free; a guide for using the Portal is provided; there is a separate section on frequently asked questions and answers; a free search is enabled, as well as a search on the basis of contracting authorities, procurement subject, time period, and the like. On the other hand, the glossary of public procurement, available on the PPO website³⁰⁸, has not been published on the Portal. In addition, open data on public procurement, are available on the Portal in various formats.³⁰⁹ In other words, almost every single section of the Portal allows the download of data in an open, machine-readable format.

The improvement compared to the previous PAR Monitor concerns the publishing of public procurement plans by ministries for the last two calendar years at the time of monitoring.³¹⁰ All ministries, and the two cabinets of ministers without portfolios, published annual public procurement plans for 2021 and 2022 on the Portal. This element received the maximum score in accordance with the methodology. Additionally, 15 ministries, and the Cabinet of the Minister without portfolio in charge of improving the development of underdeveloped municipalities, published both plans on their websites, while the Ministry of Health, the Ministry of Defence, and the Cabinet of the Minister without portfolio in charge of innovation and technological development did not publish any. Meanwhile, the Ministry of Finance, the Ministry of Environmental Protection, and the Ministry of

304 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.

305 The reports are available at: <http://bitly.ws/CGiD> and <http://bitly.ws/CGiE> (accessed 7 April 2023)

306 Available at: <http://bitly.ws/CGiY> (accessed 7 April 2023)

307 The reports are available at: <http://bitly.ws/CLFf> (accessed 10 April 2023)

308 An FAQ section is available at: <http://bitly.ws/CLNS> while video instructions are available at: <http://bitly.ws/CLNY> (accessed 10 April 2023)

309 At the time of writing this report, this section of the Portal was not operational. Available at: <http://bitly.ws/CLXD> (accessed 14 June 2023)

310 For the purposes of the elements from this indicator, the practice of 22 ministries and two cabinets of ministers without portfolios in the Government was analyzed in the period from October 2020 to October 2022.

Family Welfare and Demography have only announced plans for 2022, while the Ministry of Rural Welfare has only announced plans for 2021.

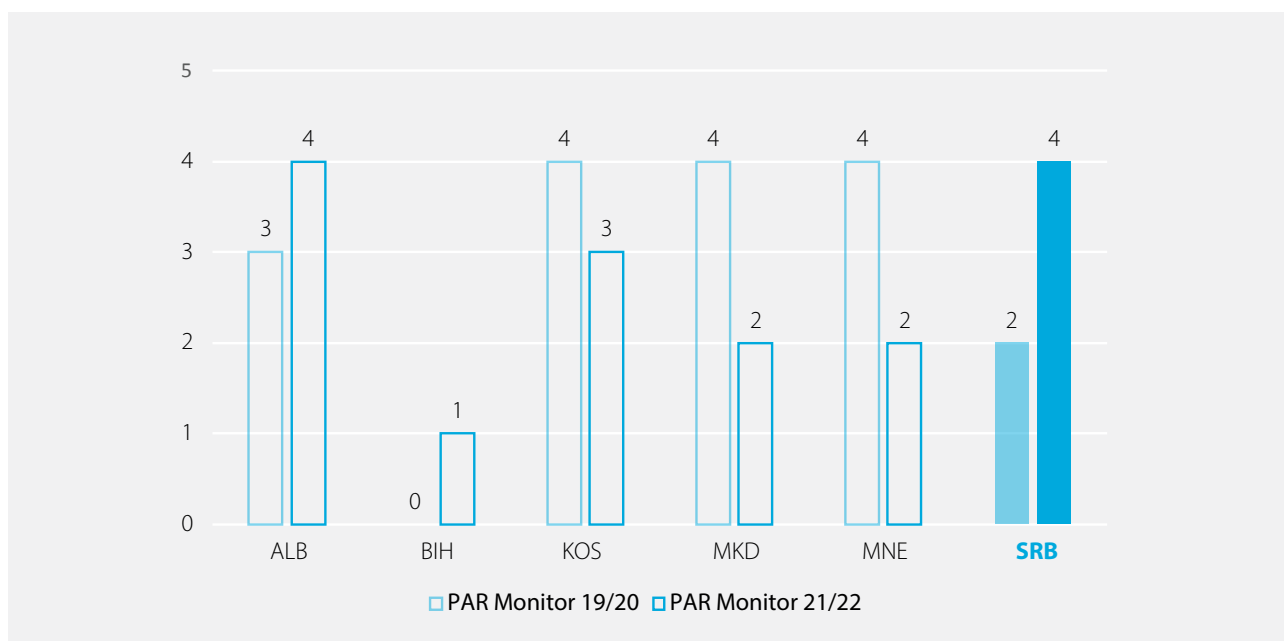
However, the practice of regular publication of annual reports on public procurement is still underdeveloped, looking at the last two calendar years at the time of monitoring (2020 and 2021). The reports for 2020 have not been published either on the Portal or websites by the Ministry of Agriculture, Forestry and Water Economy, the Ministry of Family Welfare and Demography, as well as the two Cabinets of Ministers without portfolios. As for the 2021 reports, they were available for 23 ministries, but not for the Cabinet of the Minister without Portfolio in charge of Innovation and Technological Development. Considering the existence of such exceptions, reporting on the implemented public procurement procedures of ministries on an annual basis was assessed as non-transparent.

Finally, compared to the previous cycle, progress was also noted when it comes to the share of open and competitive procedures in the total number of implemented public procurement procedures. Namely, according to the Annual Report of the PPO for 2021, approximately 99% of the total number of procedures were conducted based on an open and competitive methods, while only slightly more than 1% were conducted based on others.³¹¹

Overall, the public availability of information on public procurement improved compared to the previous PAR Monitor, so the value of the indicator increased from 2 to 4. This was primarily influenced by the fact that all ministries regularly published public procurement plans on the Public Procurement Portal, while most of them also did so on their websites. In addition, during 2021, a very small number of procedures were conducted based on methods other than open and competitive ones, which also affected the higher score compared to the previous cycle. On the other hand, ministries have still not developed the practice of regularly publishing annual reports on public procurements, neither on the Portal nor on their websites.

■ How does Serbia do in regional terms?

Chart 50: Availability of public procurement related information to the public



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org.

311 Public Procurement Office, Annual Report on Public Procurement in the Republic of Serbia for the period from January 1, 2021. until 31.12.2021., p. 17. Available at: <http://bitly.ws/CGiE> (accessed 10 April 2023)

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

Table 28: Supreme Audit Institution's communication and cooperation with the public pertaining to its work

Indicator elements	Score 2021/2022	Score 2019/2020	Score 2017/2018
E1. SAI develops a communication strategy for reaching out to the public	4/4	2/4	2/4
E2. SAI has dedicated at least one job position for proactive communication and provision of feedback to the public	4/4	4/4	4/4
E3. SAI utilises various means of communication with the public	1/2	2/2	1/2
E4. SAI produces citizen-friendly summaries of audit reports	4/4	4/4	0/4
E5. Official channels for submitting complaints or initiatives to SAI by external stakeholders are developed (wider public, CSOs)	0/2	0/2	0/2
E6. SAI consults CSOs and their work for the purpose of identifying risks in the public sector	0/2	0/2	0/2
Total score	13/18	12/18	7/18
Indicator value (scale 0 – 5)³¹²	4	4	2

Between the two monitoring cycles, the State Audit Institution (SAI) developed and adopted a communication strategy, i.e., a stakeholder engagement strategy, which represents the most significant change in this period. Although the strategy is not available on the SAI website, a representative of the institution submitted evidence that such a document was adopted in December 2021.³¹³ In addition, it should be noted that at the end of 2022, a new SAI website was created, with new possibilities for content search including audit reports.

The SAI strategically decided in the direction of more intensive communication with interested parties already in its Strategic Plan for 2019-2023, which foresaw the adoption of the mentioned strategy of engagement with stakeholders. According to the Strategic Plan, the SAI is committed to improving the communication and presentation of its products both to the legislature and the executive, as well as to other interested parties, i.e., the media, CSOs, and various social actors in general.³¹⁴ The Plan also emphasised that the SAI changed the structure of its audit reports to make them simpler and more comprehensible to the general public.

Additionally, as in previous cycles, the SAI has systematized jobs that have proactive communication and provision of feedback to the public as an integral part of the job description. Based on the data contained in the Information booklet, it can be concluded that the Service for International Cooperation and Public Relations is, among other tasks, authorised to process citizens' submissions and communicate and coordinate with CSOs.³¹⁵ Apart from that, the SAI website also lists the contact information of the person in charge of cooperation with the media, as well as the person in charge of free access to information of public importance.

312 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.

313 On October 31, 2022, the researchers conducted an interview with a representative of the Service for International Cooperation and Public Relations, when they were given an insight into the Decision on the adoption of this strategy.

314 State Audit Institution, Strategic Plan of the SAI for the period 2019–2023, p. 43. Available at: <http://bitly.ws/CMbT> (accessed 10 April 2023)

315 State Audit Institution, *Information booklet*, p. 9. Available at: <http://bitly.ws/CMg9> (accessed 10 April 2023)

However, the SAI has not yet diversified in practice its communication with stakeholders, so in this aspect, a slight decline was recorded compared to the previous cycle.³¹⁶ Namely, the SAI did not organize a single press conference in 2022, while in 2021 it organized six, five of which were held at the beginning and a single at the end of the year, which indicates irregular practice. In the observed period, the most frequently used means of communication were press releases. In addition, SAI does not use social media to present its work, and its website does not contain options for interactive data visualization. Instead, one can find online content such as video presentations of SAI, video material with media statements, press materials that are regularly published for the purposes of public presentation of audit reports³¹⁷ as well as open data since recently, in a separate section on the SAI website. In addition, during 2022, the SAI participated in events dedicated to the promotion of its work and awareness raising of government accountability, such as meetings of the Committee for Finances, the Budget of the Republic and Control of Spending of Public Funds in 2021 in Vrnjačka Banja, and in Vranje, which were attended by representatives of local media and civil society.

The SAI continued with the good practice of preparing and publishing stand-alone summaries of audit reports that are tailored to citizens. These abstracts have a standardised structure and are not longer than a single page. Based on the SAI's opinion, positive or with reservation, summaries of reports present key findings, i.e., key areas in which improvement is necessary.³¹⁸ In addition to separately published summaries, each audit report produced by SAI also contains a summary of the most important findings. These do not have the same structure as the separately published audit summaries, but they are assessed as citizen-friendly as well. As in the previous cycles, summaries of performance audit reports stand out in terms of structure and adaptation of audit findings to a wider, non-expert audience.

On the other hand, the SAI has still not developed an official online channel for the submission of complaints or initiatives from interested parties. SAI representatives confirmed that they often receive comments and questions from citizens that are mostly answered. An internal system for processing citizens' submissions has been developed, with relevant sectors addressing submissions internally or forwarding them to competent state bodies. However, considering that the existence of a publicly accessible channel with this purpose was not established, this element was not assessed positively.

Finally, when it comes to cooperation with CSOs, there is no evidence that SAI consulted civil society in 2021 or 2020, to identify risks in the public sector. According to the Strategic Plan of SAI for 2019-2023, the institution plans to continuously report to CSOs on the results of its work, but without further elaboration on this issue. The only evidence of cooperation is found in the Annual Activity Report for 2021, where it is stated that SAI cooperates with CSOs on the project Initiative for Responsible Government, which lasted from February 2018 until February 2022. However, there is no sufficient evidence that the SAI consults CSOs on relevant issues related to its audit work, and no progress has been recorded compared to the previous cycle.

Overall, the SAI continued with the good practice of external communication, and significant progress was achieved by adopting the stakeholder engagement strategy. In addition, a dedicated job position for proactive communication and providing feedback to the public has been established, and the good practice of publishing citizen-friendly summaries of audit reports has been continued. On the other hand, there was a slight decline compared to the previous cycle in the use of various means of communication, and no progress was recorded regarding the establishment of official channels for the submission of complaints or initiatives by interested parties, and there is no practice of consulting CSOs in the identification of risks for the public sector. Despite this, the value of the indicator remained 4.

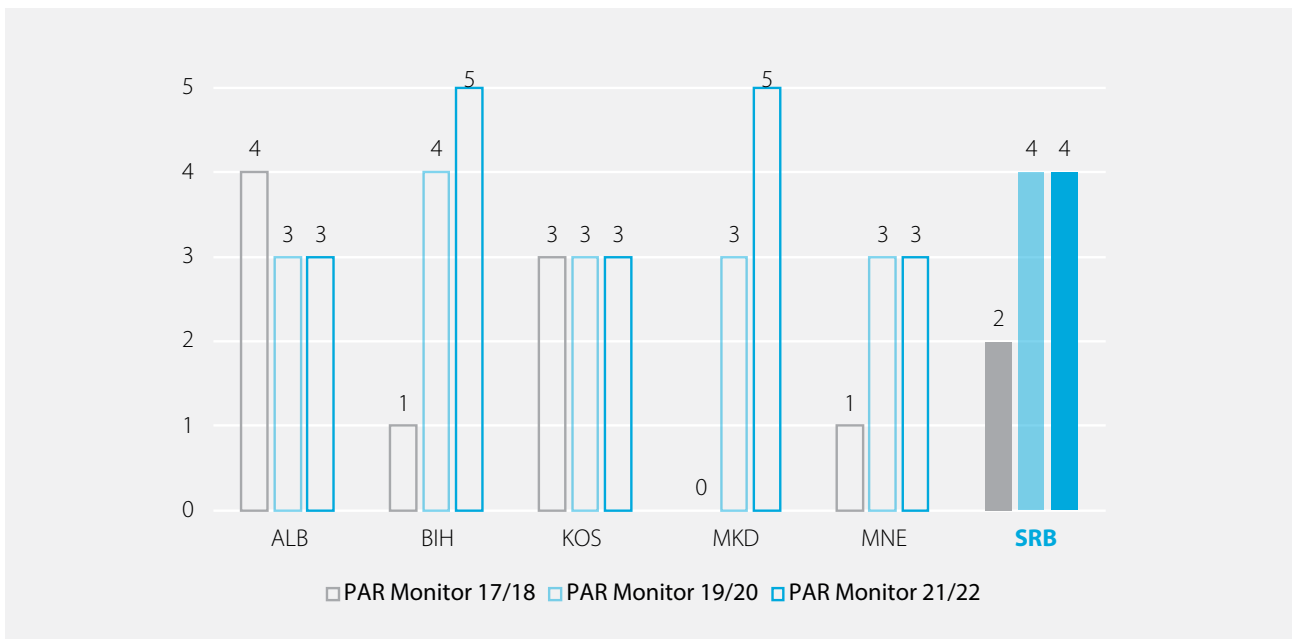
316 Communication methods within this element include media conferences, accounts on social networks, online publications of promotional materials (such as brochures, videos, etc.), organization of events dedicated to promoting the work of the SAI and the culture of responsibility of authorities, as well as online mechanisms with interactive data visualization.

317 It is available at: <https://dri.rs/video galerije> and <https://dri.rs/pres-materijal> (accessed on April 11, 2023)

318 Summaries of the report are available at: <https://dri.rs/sazeci-izvestaja> (accessed April 11, 2023)

■ How does Serbia do in regional terms?

Chart 51: Supreme Audit Institution's communication and cooperation with the public pertaining to its work



Regional PAR Monitor Report with results for all WB administrations is available at: www.par-monitor.org

VII.5 Summary of results in the Public Financial Management area

Budget transparency has not improved compared to previous monitoring cycles. The level of transparency of budget documents remained low, primarily because mid-year reports on budget execution are still not publicly available, as well as due to the irregular publication of monthly reports on budget execution. In addition, only the current Budget Law is easily accessible on the MoF website, while those from previous years have been transferred to the archive section. On the other hand, the data in the annual reports on the execution of the budget also provide non-financial information on the performance, which is expressed by sectors, users, and budget programmes. Additionally, the practice of publishing citizens' guides through the budget continued, but data on the state budget is not available on the Open Data Portal.

Moderate progress has been noted regarding the public availability of information on PFIC. Consolidated annual reports are regularly prepared and published on the MoF website for the period from 2009 to 2021. In addition, the publishing of FMC information by ministries has somewhat improved. From the convocation of the Government from October 2020 to October 2022, a little more than a third of them published data related to the FMC online. On the other hand, the CHU did not regularly inform the public about its work, while the regularity of publishing internal audit quality review reports remained partial. The National Assembly did not review consolidated reports on PFIC during the monitoring period.

Public availability of information on public procurement has also been improved. Ministries regularly published public procurement plans in this monitoring cycle. In addition, during 2021, only slightly more than 1% of public procurement procedures were not carried out based on an open method, while the Public Procurement Office continues the practice of regularly publishing annual reports on public procurements which, since the 2020 report, are available on the Public Procurement Portal. Also, the Public Procurement Portal has been rated as user-friendly and allows data to be downloaded in an open format. On the other hand, ministries still irregularly disclose annual reports on implemented public procurements, and the same is the case with the reports of the Republic Commission for the Protection of Rights in Public Procurement Procedures.

The SAI continued with the good practice of communication with interested parties, while significant progress was achieved with the adoption of the strategy for communication with the public and stakeholders. In addition, within the SAI, a job position was established for proactive communication and provision of feedback to the public, and the publication of citizen-friendly summaries of audit reports continued. On the other hand, there was a slight decline in the use of different communication means. There is still no official channel on the SAI website for the submission of complaints or initiatives by interested parties, and the institution has not developed a practice of consulting CSOs in order to identify risks in the public sector.

VII.6 Recommendations for Public Financial Management

Tracking recommendations from PAR Monitor 2019/2020

Color coding scheme for tracking recommendations

Short term recommendations	Long-term recommendations
No action taken	No action taken
Initiated	Initiated
Partially implemented	Partially implemented
Fully implemented	Fully implemented

Recommendation	Status	Comment
1. MoF should dedicate a single place on its website for ALL information on the executed budget (in-year, mid-year, annual), listing separately different budget execution reports.	No action taken	There is no single location on the MoF website with all budget-related documents. Macroeconomic and fiscal data overview is available from the Documents section. In-year budget reports (monthly Public Finance Bulletins) are available under the Publication section. Mid-year budget execution reports are still not publicly disclosed. Budget execution reports are available on the National Assembly website.
2. MoF should publish budget execution data as comprehensively as possible, for better understanding of external stakeholders and greater transparency. This means that, besides economic classification data, each report should allow for accessing execution data by functions of the Government and individual budget users' execution, for the central state institutions at least.	Partially implemented	Available budget execution reports do not reveal data on all budget classifications. Mid-year reports are unavailable, and monthly reports contain economic data only. On the other hand, the Law on the Final Account of the Budget of the Republic of Serbia for 2020 does contain nonfinancial performance information for all 24 policy sectors.
3. Year-end budget reports should provide non-financial performance information of the Government, in different policy areas (e.g., social policy, agriculture, education, environment, etc).	Fully implemented	At the time of writing this report, the Law on the Final Account of the 2022 Budget was not adopted by the National Assembly, but the Law for 2021 does provide non-financial performance information for the majority of public policy areas. ³¹⁹

319 Ministry of Finance, Law on the Final Account of the 2021 Budget, available at: <http://bitly.ws/zU6u> (last accessed 3 March 2023)

<p>4. MoF should publicly disclose non-financial performance information in a concise and citizen-friendly way explaining achievements by the Government as a result of budget execution. More detailed information can be provided by disclosing information on programme-budget indicators at the level of the programmes of all budget users.</p>	<p>No action taken</p>	<p>The Ministry does not publicly provide any document, other than the Citizen guide through the budget, which could explain the achievements of the budget execution in a citizen-friendly way.</p>
<p>5. MoF should store expired editions of the Citizen budget at a single location, together with the current one.</p>	<p>Partially implemented</p>	<p>Some of the previous guides are available on the official website of the MoF in the Archive section, but not on the same location as the newest one.³²⁰</p>
<p>6. MoF should pursue open data policy to the fullest, by publishing ALL budgetary data in preferably more than one open format, in line with the open data standards. This should also entail making datasets available through the national open data portal, but also easily accessible on the website banner/section at the MoF website.</p>	<p>Partially implemented</p>	<p>Budgetary data is available in an open format on the Ministry's website under the Documents section, but there is no dedicated open data section on the website. The MoF is not yet on the list of organisations that shares data on the national Open data portal. Data on individual local self-governments is available on the Portal, but not at the central level.</p>
<p>7. Ministries in Serbia, but also other direct budget beneficiaries, should dedicate an easily accessible, single website section for updates on PIFC within the organisation that should at least include: the mission and goals of the organisation, responsible persons for implementing the PIFC, business procedures, information on risk management and reported irregularities.</p>	<p>No action taken</p>	<p>Ministries' websites do not have a special section on PIFC with relevant updates and information.</p>
<p>8. MoF/CHU should improve external communication by publishing materials for explaining PIFC and highlighting important developments in the public sector to the citizens, using simple language and examples from practice (such as infographics, videos, brochures, readers' digests or summaries of reports that CHU already produces, social media).</p>	<p>No action taken</p>	<p>The section of MoF's website dedicated to the CHU does not contain any material which would be useful for explaining the purpose PIFC to the citizens.</p>
<p>9. SAI should clearly promote information and its procedure on receiving and handling citizens' inputs, tips, and complaints on a specifically dedicated website location.</p>	<p>No action taken</p>	<p>SAI's website does not have a specific location dedicated to receiving and handling citizens' inputs and complaints. In its Annual Activity Reports, SAI does mention cooperation with the citizens, but does not detail the number of inputs, and how they have been processed.</p>

³²⁰ The documents are available at two separate locations on the website of the MoF: <http://bitly.ws/B7dx> and <http://bitly.ws/B7dC> (last accessed 3 March 2023)

<p>10. SAI should consider using as many citizen-friendly tools as possible for the communication of its work, including full data visualisation in long term, as it is in possession of a large amount of information that can be used for citizen-friendly communication.</p>	<p>Partially implemented</p>	<p>The section of SAI's website on the presence of SAI in the media has a number of tools aimed at communicating its work, such as announcements, report summaries, video material on television appearances of SAI employees, etc.³²¹ However, it does not make use of proper data visualisation and SAI is not present on mainstream social media.</p>
<p>11. PPO should consider supplementing annual reports on public procurement implementation in Serbia with summaries of the performance during a year so that readers have a clear, simple and visually adjusted insight into the real outcomes of public procurement in the reporting period.</p>	<p>No action taken</p>	<p>Annual reports produced by the PPO do not contain summaries.</p>
<p>12. PPO should consider registration-free access to the public procurement portal for all interested users, to allow monitoring of contract realisation.</p>	<p>Fully implemented</p>	<p>All the documentation on the Public Procurement Portal is available without registration and can be used to monitor contract realisation.</p>
<p>13. MoF should consider introducing consistent approach to communicating PIFC developments to the public, either on separate portal or the MoF webpage, instead of shifting from one option to another (PIFC portal running at the time of the PAR Monitor 2017/18 is no longer active).</p>	<p>Fully implemented</p>	<p>Information on PIFC is available in one place on the website of the Ministry of Finance.³²²</p>

321 Available at: <https://dri.rs/pres-materijal> (last accessed 3 March 2023)

322 Available at: <http://bitly.ws/B7ej> (last accessed 3 March 2023)

PAR Monitor 2021/2022 recommendations

The majority of the recommendations from the 2019/2020 PAR Monitor, still relevant in this monitoring cycle, are repeated and some of them have been slightly modified, either to make them more relevant to the somewhat changed legal framework or simply to make them clearer and more specific.

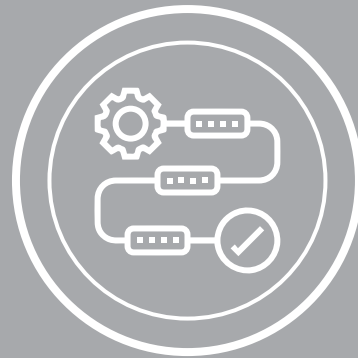
Repeated and modified recommendations from PAR Monitor 2019/2020

1. MoF should dedicate a single place on its website for ALL information on the executed budget (in-year, mid-year, annual), listing separately different budget execution reports.
2. MoF should publish budget execution data as comprehensively as possible, for a better understanding of external stakeholders and greater transparency. This means that, besides economic classification data, each report should allow for accessing execution data by functions of the Government and individual budget users' execution, for the central state institutions at least.
3. MoF should publicly disclose non-financial performance information in a concise and citizen-friendly way explaining achievements by the Government as a result of budget execution. More detailed information can be provided by disclosing information on program-budget indicators at the level of the programs of all budget users.
4. MoF should store expired editions of the Citizen budget at a single location, together with the current one.
5. MoF should pursue open data policy to the fullest, by publishing ALL budgetary data on the Open Data Portal.
6. Ministries in Serbia, but also other direct budget beneficiaries, should dedicate an easily accessible, single website section for updates on PIFC within the organization that should at least include: the mission and goals of the organization, responsible persons for implementing the PIFC, business procedures, information on risk management and reported irregularities.
7. CHU should improve external communication by publishing materials for explaining PIFC and highlighting important developments in the public sector to the citizens, using simple language and examples from practice (such as infographics, videos, brochures, readers' digests, or summaries of reports that CHU already produces social media).
8. SAI should clearly promote information and its procedure on receiving and handling citizens' inputs, tips, and complaints on a specifically dedicated website location.
9. PPO should consider supplementing annual reports on public procurement implementation in Serbia with summaries of the performance during a year so that readers have a clear, simple, and visually adjusted insight into the real outcomes of public procurement in the reporting period.

New recommendations 2021/2022

10. SAI should consider the possibility of conducting consultations with CSOs on a regular basis, at least once a year. For the purpose of planning and conducting these consultations, SAI should consider signing a cooperation memorandum or other, non-obliging forms of cooperation with CSOs.
11. PPO should make the Public Procurement Glossary available on the Public Procurement Portal as well so that users can find all useful information in one place.

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

An important facet of the WeBER monitoring of PAR 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 practices, 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, 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) 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 Financial 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.³²³

The “Master Methodology” document and the detailed indicator tables, all available on the WeBER website,³²⁴ should also be considered as part of the entire PAR Monitor package and can be used to fully understand the details of this monitoring exercise.

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”.³²⁵ 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

As in previous monitoring cycles, a multi-layered quality assurance procedure was applied in this cycle as well 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:

- 1) a peer-review process, which involved different collaborative formats, such as written feedback, online team meetings and workshops.
- 2) 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.

³²³ 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.

³²⁴ PAR Monitor methodology, available at: <https://www.par-monitor.org/par-monitor-methodology/>.

³²⁵ *Regional PAR scoreboards*, available at: <https://www.par-monitor.org/regional-par-scoreboards/>

The national reports also underwent standard internal review procedures by each WeBER partner organisation.

■ 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, 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.³²⁶ 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).

■ Data collection methods

For producing this National PAR Monitor report for Serbia, the following research methods and tools were used for data collection and calculation of indicators:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Focus groups
- Interviews with stakeholders
- Public perception survey
- Survey of civil servants
- Survey of civil society organisations.

³²⁶ European Commission's Enlargement package, and progress reports, are available at: https://ec.europa.eu/neighbourhood-enlargement/countries/package_en

■ Analysis of official documentation, data and official websites

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. Documents which were analysed to this end 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 evaluations etc.)
- individual legal acts (decisions, conclusions etc.)
- Other documents (agendas, meeting minutes and reports, announcements, guidelines, directives, memorandums etc.).

In some instances, responsible authorities were directly contacted by researchers for missing documents and data. 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. In the area Policy Development and Coordination, for monitoring transparency of governmental decision-making (indicator PDC_P6_I1), and public availability of information on Government's performance reporting (PDC_P5_I1), the following websites were analysed:

1. The Government of the Republic of Serbia - <http://www.srbija.gov.rs/>
2. Open Data Portal of the Republic of Serbia - <https://data.gov.rs/sr/>
3. Ministry of Finance - <https://www.mfin.gov.rs/>
4. Public Policy Secretariat – <https://rsjp.gov.rs/sr/>
5. Ministry of European Integration - <https://www.mei.gov.rs/>
6. Official Gazette of Republic of Serbia - <http://www.pravno-informacioni-sistem.rs/>

In the Public Service and Human Resource Management area, for the monitoring of openness, transparency, and fairness of recruitment into the civil service (PSHRM_P3_I1), and for public availability of official data and reports about the civil service and employees in central state administration (PSHRM_P2_I1), the following websites were analysed:

1. Human Resource Management Service - <http://www.suk.gov.rs/>
2. National Academy for Public Administration - - <https://www.napa.gov.rs/>
3. Ministry of Public Administration and Local Self-Government - <http://mduls.gov.rs/>
4. Open Data Portal - <https://data.gov.rs/sr/>
5. The Government of the Republic of Serbia - <http://www.srbija.gov.rs/>
6. Ministry of Foreign Affairs - <https://www.mfa.gov.rs/>
7. Administration for Joint Affairs of Republic Bodies - <https://www.uzzpro.gov.rs/>
8. The General Secretariat of the Government - <https://gs.gov.rs/>
9. Ministry of Finance - <https://www.mfin.gov.rs/>
10. Ministry of Culture and Information - <http://www.kultura.gov.rs/>

In the Accountability area, for monitoring proactive informing of the public, by public authorities, (ACC_P2_I2), the following websites were analysed:

1. Ministry of Economy - <https://privreda.gov.rs/>
2. Ministry for Human and Minority Rights and Social Dialogue - <https://www.minljmpdd.gov.rs/>
3. Ministry of Family Welfare and Demography - <https://minbpd.gov.rs/>
4. Ministry of Finance - <https://www.mfin.gov.rs/>
5. Directorate for Agrarian Payments - <https://uap.gov.rs/>
6. Republic Secretariat for Legislation - <https://www.rsz.gov.rs/index.html>
7. National Employment Service - <https://www.nsz.gov.rs/>

In the Service Delivery area, for monitoring availability of information regarding the provision of administrative services on the websites of service providers (SD_P4_I2), the following websites were analysed:

1. Republic Geodetic Authority - <http://www.rgz.gov.rs/>
2. Serbian Business Registers Agency - <http://apr.gov.rs/>
3. Ministry of Interior - <http://mup.gov.rs/>
4. Tax Administration - <http://www.poreskauprava.gov.rs/>
5. eGovernment Portal - <https://www.euprava.gov.rs/>

In the Public Financial Management area, for monitoring transparency and accessibility of budgetary documents (PFM_P5_I1), public availability of information on public internal financial controls and the parliamentary scrutiny (PFM_P6&8_I1), availability of public procurement related information to the public (PFM_P11&13_1),³²⁷ and Supreme Audit Institution's communication and cooperation with the public (PFM_P16_I1), the following websites were analysed:

1. Ministry of Finance - <http://www.mfin.gov.rs/>
2. The Government of the Republic of Serbia - <http://www.srbija.gov.rs/>
3. State Audit Institution - <http://www.dri.rs/>
4. Open Data Portal - <https://data.gov.rs/sr/>
5. Public Procurement Office - <http://www.ujn.gov.rs/>

■ Requests for free access to information (FOI)

As the PAR Monitor methodology strongly relies on the analysis of public availability of information and data, usually based on the websites of public authorities, FOI requests were not comprehensively sent out for each PAR area or every indicator. Requests were sent in cases where monitoring focus was on the proper identification of certain practice within administration, rather than public availability of information. Hence, where specific indicator requires online availability of information on specific websites, FOI request were not sent.

That said, the researchers used FOI requests as a data collection tool in three areas: Policy Development and Coordination (indicator PDC_P10_I1), Public Service and Human Resource Management (PSHRM_P3_I1, PSHRM_P4_I1, PSHRM_P2_I1), and Accountability (ACC_P2_I2). In Serbia, a total of 21 FOI requests were sent in the monitoring period from January to August 2022.

³²⁷ For indicators related to the public availability of information on public internal financial control, parliamentary scrutiny, and information regarding public procurement, the websites of all ministries of the Government from October 2020 to October 2022 were analysed.

Table 29: FOI requests sent for the 2021/2022 monitoring cycle in Serbia

Institution	Date of request	Date of reply/ information receipt*
Administration for Joint Affairs of Republic Bodies	12 July 2022	22 July 2022
Directorate for Agrarian Payments	24 January 2022	28 January 2022
General Secretariat of the Government	7 February 2022 13 July 2022	No reply 26 July 2022
Human Resources Management Service	2 June 2022 2 June 2022 15 August 2022	14 June 2022 14 June 2022 23 August 2022
Ministry for Human and Minority Rights and Social Dialogue	24 January 2022	25 January 2022
Ministry of Culture and Information	12 July 2022	12 August 2022
Ministry of Economy	24 January 2022	28 January 2022
Ministry of Environmental Protection	12 July 2022	No reply
Ministry of Family Welfare and Demography	24 January 2022	4 February 2022
Ministry of Finance	24 January 2022 12 July 2022	No reply 4 August 2022
Ministry of Foreign Affairs	12 July 2022	21 July 2022
Ministry of Health	12 July 2022	18 August 2022
Ministry of Justice	12 and 18 July 2022	29 August 2022
National Employment Service	24 January 2022	28 January 2022
Office for Information Technologies and eGovernment	12 July 2022	26 July 2022
Republic Secretariat for Legislation	24 January 2022	1 February 2022
Seismological Survey of Serbia	12 July 2022	26 July 2022

* Dates indicated do not mean in all cases provision of requested information. In certain, fewer number of cases, public authorities informed they are not in the possession of requested information, or they will reply within the extended deadline in accordance with the Law.

■ Focus groups

Focus groups were conducted for collecting qualitative, in-depth inputs from stakeholders for a selection of indicators - for the ones either fully based on survey data to complement them, or for those that relied on otherwise collected information that needed to be corroborated by focus group participants. The PAR Monitor methodology envisaged focus groups for:

- Strategic Framework for PAR, with civil society organisations (for indicators SFPAR_P1_I1, SFPAR_P2&4_I1)
- Policy Development and Coordination, with civil society organisations (for indicators 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)
- Accountability, with civil society organisations (for indicator ACC_P2_I1)
- Service Delivery, with civil society organisations specifically dealing with accessibility issues, vulnerable groups, and persons with disabilities (for indicator SD_P4_I1).

In Serbia, 1 focus group with CSOs was conducted for Strategic Framework for PAR area. The focus group was held on July 13th, 2022, and representatives of six CSOs participated. As in the previous editions of the PAR Monitor report, instead of a focus group with candidates who previously applied for job positions in central administration, interviews were organised as an alternative, due to the low response rate of focus group invitees. In addition, instead of a focus group with representatives of CSOs for Service Delivery area, interviews were held with representatives of organisations dealing with accessibility issues, vulnerable groups, and persons with disabilities.

■ Interviews with stakeholders

Interviews were conducted to collect qualitative, focused, and in-depth inputs from stakeholders on monitored phenomena. For a few indicators, interviews are envisaged as data sources according to the indicator tables. Nonetheless, they were additionally used in the research to complement and verify otherwise collected data and findings.

Interviews were semi-structured, composed of set of open-ended questions, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise and relevance for the topic.

In Serbia, a total of 13 interviews were held within the monitoring period. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation, to ensure higher response rate and facilitate open exchange.

Table 30: Interviews conducted in Serbia

Date	Interviewees	PAR Area
23 May 2022	Civil servant, Ministry of Public Administration and Local Self-Government	SF PAR
23 May 2022	Civil servant, Ministry of Public Administration and Local Self-Government	SF PAR
30 May 2022	Civil servant, Ministry of Finance	SF PAR

6 September 2022	Acting senior civil servant, Public Investment Management Office	PSHRM
7 September 2022	Civil servant, Resources Management Service	PSHRM
12 October 2022	Expert in PAR area	PSHRM
12 October 2022	Expert in PAR area	PSHRM
17 October 2022	Former candidate for job position in central administration	PSHRM
31 October 2022	State Audit Institution representative	PFM
27 April 2023	A representative of a CSO that deals with accessibility issues, vulnerable groups, and persons with disabilities	SD
27 April 2023	A representative of a CSO that deals with accessibility issues, vulnerable groups, and persons with disabilities	SD
28 April 2023	A representative of a CSO that deals with accessibility issues, vulnerable groups, and persons with disabilities	SD
4 May 2023	A representative of a CSO that deals with accessibility issues, vulnerable groups, and persons with disabilities	SD

Public perception survey

The public perception survey is based on a questionnaire targeting the general public (aged 18 and older) in the entire Western Balkans. The survey was administered through combining computer-assisted web and telephone interviewing (CAWI, and CATI), using a two-stage, random, representative stratified sampling (primary sampling: households, secondary sampling unit: household member). It was implemented as part of the regional omnibus surveys in the Western Balkans during 4th May – 31st May 2022. For Serbia, the margin of error for the total sample of 1005 citizens is $\pm 3.14\%$, at the 95% confidence level.

Table 31: Survey sample breakdown

	TOTAL	% (of observations)
TOTAL	1005	100%
Key groups		
Gender		
Male	482	47.9
Female	523	52.1
Age		
18-29	185	18.4
30-44	255	25.4
45-59	277	27.6
60+	287	28.6
Educational attainment		
Primary school	208	20.7
Primary school	585	58.2
University degree or higher	212	21.1
Employment status		
In paid work	495	49.3
Unemployed	110	10.9

Other	400	39.8
Employment sector		
Public	114	23.1
Private	381	76.9
Area		
Rural	417	41.5
Urban	588	58.5
Region		
Belgrade	232	23.1
Vojvodina	270	26.9
Sumadija	280	27.9
South and East Serbia	222	22.1

■ Survey of civil servants

Civil servants survey was implemented based on a unified questionnaire targeting civil servants working in the six Western Balkan administrations. The questionnaire was translated and adapted to local languages, and it consists of five sections covering: 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 (web SAQ).

For Serbia, a total of 1344 civil servants participated in the survey from May 9th to June 20th, 2022. The Ministry of Public Administration and Local Self-Government (MPALSG) facilitated the dissemination of the survey by sending the questionnaire to the mailing lists of civil servants working in central state administration bodies.

Table 32: Breakdown of the sample for survey of civil servants

	N	% (of observations)
TOTAL	1344	100%
Key groups		
Civil service position		
Senior civil service manager – head of authority	33	2.46
Senior civil service manager – not a head of authority	77	5.73
Non-senior civil service manager (executorial)	284	21.13
Civil servant in non-managerial expert position	688	51.19
Administrative support civil servant position	36	2.68
Civil servant on fixed-term contract or otherwise temporarily engaged	167	12.43
Political appointment (minister’s cabinet or otherwise)	5	0.37
Other	54	4.02

State administration institution		
Ministry	668	52.93
Subordinate agency	309	24.48
Centre-of-government institution (PM office, government office, government service)	100	7.92
Autonomous agency within the central state administration	185	14.66
Other	0	0.00
Gender		
Male		32.81
Female	861	64.06
Other	4	0.30
Do not want to respond	38	2.83
Years working in the administration		
Mean= 13 years; Range= 0-50 years		
Sector worked before joining the administration		
Local or regional administration	94	18.84
Other branch of power	73	14.63
Public services	77	15.43
International organisation	64	12.83
Non-governmental organisation	65	13.03
Media	39	7.82
Private sector	32	6.41
This was my first job	30	6.01
Other	25	5.01

Table 33: 95% confidence interval (CI) (per question of the survey of civil servants)

Question	95% CI	Question	95% CI	Question	95% CI
Q1_1	3.14-3.27	Q4_1	2.83-3.0	Q7	2.72-2.92
Q1_2	3.59-3.72	Q4_2	2.69-2.87	Q8_1	3.29-3.44
Q1_3	3.06-3.21	Q4_3	3.03-3.20	Q8_2	3.26-3.42
Q2	2.44-2.57	Q4_4	3.34-3.51	Q8_3	2.31-2.48
Q3_1	3.28-3.44	Q5_1	3.49-3.66	Q9	2.54-2.70
Q3_2	3.75-3.9	Q5_2	2.51-2.73	Q10	1.37-1.47
Q3_3	3.12-3.28	Q5_3	2.45-2.67		
Q3_4	3.29-3.42	Q5_4	3.15-3.37		
Q3_5	3.52-3.69	Q6	3.02-3.17		

■ Survey of civil society organisations

CSO survey results are based on a unified questionnaire targeting representatives of CSOs working in the entire Western Balkans. In this monitoring cycle, the questionnaire included 7 thematic sections covering:

- CSOs involvement in evidence-based policymaking,
- participation in policy- and decision-making,
- exercising the right to free access of information,
- transparency of decision-making processes,
- CSO's perceptions on government's planning, monitoring, and reporting on its work,
- integrity of public administration, and
- the accessibility of administrative services.

Data collection was conducted using a self-administered questionnaire on SurveyMonkey platform (web SAQ).

For Serbia, a total of 150 CSOs participated in the survey from March 23rd to June 28th, 2022. To get as wider reach as possible, the survey was widely distributed to networks and contacts in civil society, including coordinators and members of the working groups of the National Convention on the European Union (NCEU), the Resource Centre for Civil Society in Serbia, as well as to e-mail addresses found in the CSO database maintained by the Ecological Movement Odzaci.

Table 34: Breakdown of the CSO survey sample in Serbia

	N	% (of observations)
TOTAL	150	100
Key groups		
Type of organisation ³²⁸		
Policy research/Think-tank	33	12.09
Watchdog	31	11.36
Advocacy	64	23.44
Service provider	49	17.95
Grassroot	41	15.02
Other	55	20.15
Field of operation		
Governance and democracy	32	4.49
Rule of law	48	6.74
Human rights	71	9.94
Public administration reform	40	5.62
European integration	43	6.04
Gender issues	37	5.20
Children and youth	57	8.01
Environment and sustainable development	85	11.94
Education	57	8.01

³²⁸ Multiple choice possible. As a result, the overall sample per category may exceed the sample size (150), or the total percentage of observations may be over 100.

Culture	33	4.63
Health	27	3.79
Media	31	4.35
Economic development	31	4.35
Civil society development	61	8.57
Social services	32	4.49
Other	27	3.79
Year of registration of the CSO		
Mean= 2003; Range=1869-2021		
Position of the respondent in the organisation		
Senior-level management	104	66.67
Mid-level management	15	9.62
Senior non-management	6	3.85
Mid-level non-management	7	4.49
Other	24	15.38
Years working with the organisation		
Mean=12.03 years; Range=0-40 years		

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Public Policy Secretariat, „Public debate on the Proposal Programme for improving Public Policy and Regulatory Reform Management with Action Plan for period 2021-2025“, available at: <http://bitly.ws/Brhw>

“WeBER PAR monitoring represents excellent support that decision-makers could skilfully use to adapt and improve existing public policies, both in Serbia and the region. What WeBER PAR monitoring means to NKD is the fact that, in addition to exchanging experiences with colleagues from CEP, NKD has an excellent basis to further participate in the monitoring of other public policies that are the focus of our mission – More specifically, NKD will apply the experiences gained through WeBER PAR monitoring in the future period when the most important public documents for us will be adopted, namely the National Development Plan of the Republic of Serbia, as well as accompanying acts to this document.”

Tadija Mitić

Project coordinator, National Coalition for Decentralisation

“The Public Policy Secretariat, as one of the central institutions of the Government, has a controlling role in terms of quality assessment of public policy documents and regulations. The WeBER PAR monitor contributes to raising the awareness of the citizens of the Republic of Serbia about the need for their greater participation in the process of creating public policies. With these joint forces, we contribute to the successful implementation of the public administration reform, its transparency, and greater efficiency in work.”

Janko Prica

*Senior Advisor, Public Policy Secretariat,
Section for Public Policy Monitoring, EU Integration,
International Cooperation and Project*

“In the last few years, the WebER PAR Monitor has been one of the largest, if not the largest, endeavor of civil society in Serbia to systematically and comprehensively address issues of public administration reform, as issues of importance for all citizens in our country. Building the capacity of local organizations for the application of the established methodology and their inclusion in the complex process of research, analysis, monitoring, and thematic networking was a special challenge in itself for the entire program. However, precisely this approach enabled a deeper understanding of the role of the civil sector as a relevant actor in the dialogue on public administration reform.”

Stanka Parać Damjanović

Director, Local Democracy Agency, Subotica

“WeBER Par Monitor helps civil society organizations throughout Serbia to actively and reasonably contribute to the reform of public administration and strengthen the pressure on authorities to act responsibly. It helped local organizations of civil society to strengthen their supervisory role. It was also a good starting point for specific activities and initiatives significant for their area of activity, i.e., their communities.”

Marija Milošević Tanasijević

Res Publica, Kragujevac



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