



NATIONAL PAR MONITOR SERBIA

2019/2020

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ABOUT WeBER2.0

The Western Balkan Civil Society Empowerment for a Reformed Public Administration (WeBER2.0) is a three-year project principally funded by the European Union (EU). For activities related to the preparation and printing of the PAR Monitor 2019/2020 and the organisation of the second regional “Citizens First” conference in February 2021, co-funding was provided by the “Protecting Civic Space – Regional Civil Society Development Hub” project, financed by the Swedish International Development Cooperation Agency (Sida) and implemented by the Balkan Civil Society Development Network (BCSDN). WeBER2.0 represents a 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.

The first WeBER project has contributed to increasing the relevance, participation, and capacities of civil society organisations (CSOs) and the media in the Western Balkans (WB) to advocate for and influence the design and implementation of public administration reform (PAR). WeBER2.0 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.

A combination of activities is conducted in WeBER2.0, contributing to the achievement of the project’s objective, namely:

- Through the Regional WeBER Platform and its National PAR Working Groups, which gather more than 130 CSOs, WeBER2.0 is facilitating dialogue on PAR for creating and implementing inclusive and transparent policy, as well as contributing to the sustainability of administrative reforms to the benefit of the citizens.
- Through its research and monitoring work and production of PAR Monitor reports, WeBER2.0 has created and gathered evidence for a meaningful dialogue.
- Through the CSO PAR Knowledge Centre, WeBER2.0 provides a searchable database of analyses and reports on PAR produced by the region’s civil society.
- 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/>), WeBER2.0 is collecting 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, WeBER2.0 aims to improve the embeddedness of PAR across the region’s administrative systems, thus increasing the sustainability of these reforms.
- Through a small grants scheme, WeBER2.0 works on improving the capacity of CSOs in the Western Balkans to participate in PAR.

WeBER2.0 products and further information about them are available on the project’s website, at www.par-monitor.org.

WeBER2.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



institut alternativa



By partnering with the European Policy Centre (EPC) from Brussels, WeBER2.0 has ensured EU-level visibility.



WHO DO WE COOPERATE WITH?

Under the previous WeBER project, cooperation with a multitude of stakeholders in the region and beyond has been established in the effort to ensure a sustainable course of administrative reforms in the WB. This cooperation has continued under WeBER2.0. At the national level, in each of the WB countries, we have coordinated our work with PAR ministries and/or offices which have had an associate role on the project. At the regional level, WeBER2.0 is cooperating with the Regional School of Public Administration (ReSPA), Southeast Europe Leadership for Development and Integrity (SELDI) coalition, and the Support for Improvement in Governance and Management initiative (SIGMA, a joint initiative of the EU and the OECD), which performs regular assessments of the WB countries' progress in the implementation of the Principles of Public Administration in the period leading up to the EU accession.

Furthermore, within the regional WeBER Platform and National PAR Working Groups (NWGs), we have continued to cooperate with over a 130 CSOs operating at the local and regional level.

EXECUTIVE SUMMARY

WHY IS PAR MONITORING BY THE CIVIL SOCIETY STILL RELEVANT?

Public administration reform (PAR) remains a key requirement for the EU aspirants on their accession path, and according to the revised enlargement methodology it is now part of the cluster on fundamentals (together with, for instance, rule of law, and economic criteria). As a complex and all-encompassing reform, PAR in the Western Balkan region has for years been thoroughly assessed through the lenses of the SIGMA Principles of Public Administration, developed by the 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 achieve 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 its second, 2019/2020 monitoring cycle.¹ Its structured and evidence-based approach to PAR monitoring, just like in the first monitoring cycle in 2017/18, particularly focuses on PAR aspects with the highest relevance to the 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 areas, monitored and reported through 23 compound indicators.

The PAR Monitor methodology is rooted in the regional approach. 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. The present report provides results of the second monitoring exercise for Serbia, including a set of actionable recommendations.

¹ Starting from December 2019, WeBER is being implemented under the title "WeBER2.0 - Western Balkan Civil Society Empowerment for a Reformed Public Administration".

OVERVIEW OF WEBER MONITORING RESULTS FOR SERBIA 2019/2020

Strategic framework for PAR: additional efforts needed towards fully inclusive design and monitoring of PAR strategic documents

The 2019/2020 monitoring cycle in Serbia found that the inclusion of civil society organisations (CSOs) in the development of PAR strategic documents was limited. Civil society and the public were consulted on one out of two key strategic documents observed in this cycle, i.e., in the development for eGovernment Development Programme 2019-2022, while no proper consultations were conducted for the development of the Revised Public Finance Management Reform Programme and its Action Plan for July 2019 - December 2020. When eGovernment Development Programme was drafted, the responsible Ministry organised early consultations with different target groups (focus groups with local self-governments, business, IT sector, donor community, citizens), and later public debate on the adopted proposal of the Programme, but involvement of CSOs was limited in all these phases. Report on consultation process presents all the inputs from focus groups, but it does not specify particularly which inputs were used (although, some of these inputs are listed in the final version of the Programme which provides an overview of whether they were accepted or not). Public debate report presents all the comments received (individually or grouped together based on topics), with their status of acceptance/rejection and justification. The monitoring also found little proactiveness on behalf of the responsible Ministry in ensuring that a wide range of external stakeholders are included in the process. Beside business associations, there was no involvement of trade unions, organisations focusing on gender equality, or on people with disabilities.

When it comes to the involvement of the civil society organisations in the PAR monitoring process, the findings resemble the baseline PAR Monitor 2017/2018. The Inter-Ministerial Project Group (IMPG), administrative body for PAR coordination and monitoring, is still the only one with the CSO membership. The notable change is that the selection procedure for CSOs to participate in the renewed IMPG was based on the results of a previously announced open call for the development of PAR Strategy AP 2018-2020. Although the format of the IMPG meetings nominally allowed for comments and contributions by civil society representatives, these meetings were neither held regularly, nor were the CSOs consulted on agenda setting or matters related to PAR financing.

Policy development and coordination: on the same, rooted positions - the Government remains non-transparent, and civil society dissatisfied

Practices of the Government's publication of workplans and work reports have not marked tangible improvements since the baseline PAR Monitor. The Government still does not regularly disclose its annual reports to the public, and contents of these reports are not addressing Government's overall performance. As in the baseline PAR Monitor, the only consistent approach to presenting information about Government's activities is found in publishing of press releases. At the same time, civil society's highly negative views of the quality of the Government's planning and reporting did not alter since the 2017/18 monitoring cycle.

Following the same trend from the previous monitoring cycle, the transparency of decision-making at governmental sessions has remained quite opaque. Only press releases and majority of adopted acts are published after each session, whereas agendas and minutes from sessions do not get publicly released. Importantly, government conclusions – important acts for deciding on non-legislative issues – as a rule do not get published as well. Along these lines, surveyed CSOs perceive decision making processes of the Government as extremely non-transparent.

As in the baseline PAR Monitor, evidence produced by CSOs does get cited in adopted policy documents (such as strategies and programmes), whereas this is much less frequently the case for policy papers and impact assessments. Though there were fewer examined ex-post policy evaluations and analysis, since they are not yet well established in the policymaking system, a considerable share did reference CSO findings (3 of 4 such documents), which marks a noteworthy improvement compared to the previous monitoring cycle. Surveyed CSOs share largely negative views on the opportunities for their effective contribution with

evidence in the development of policy documents through working groups. A slight exception is found in more positive views regarding the opportunities that CSOs have to present policy recommendations to policymakers at their events.

Finally, a revised indicator on inclusiveness of policymaking processes via public consultations and public debates, although striking a better balance between analysis of practices and CSOs' perceptions, still returns poor findings. The actual consultation practices lack consistency, as the numerous analysed cases do not confirm widespread quality of consultation procedures. While the scope of consultations on policy documents is on a solid level, for legislation it is much lower. Moreover, reporting on public consultations for both policy documents and legislation was registered in majority, but not in all cases when they were conducted (in around 70%). Yet, other elements important for the quality of consultative processes, such as proactiveness in informing the public, quality of the reporting on consultations, practicing consultations in early phases of the policy cycle, are largely missing. At the same time, proper online consultation platform was also not in place at the time of monitoring. Finally, survey results display, once again, civil society's highly negative view of how responsible authorities in Serbia implement public consultations and debates in practice.

Public service and human resource management: still a long way to transparency and professionalisation

This monitoring cycle returned no evidence that the Government in Serbia either stores reliable data on public service or publishes them. Likewise, information that is available in the database is not available in an open format and cannot be filtered in terms of different categorisations (e.g., per gender or ethnicity). On a more positive note, the Government is found to work on promotion through difference channels of at least certain information about public service, i.e., on professional development of civil servants.

While the number of temporary engagements in Serbian civil service is regulated by legislation, other areas concerning temporary engagements are less so. For instance, no specific criteria are found for the admission of individuals to these positions, hiring procedure is not open and transparent and duration of these contracts is not strictly limited. What adds to this rather negative state of play in temporary engagements is results from the survey of civil servants. Put differently, civil servants see temporary engagements as a rule and report that temporary contracts are often extended to more than one year.

As for public competitions for civil service positions, these are generally made publicly available. However, announcements are still not written in a clear, simple, and understandable language to the broader public and there are aspects of the procedure that make it more difficult for external candidates to get a position in civil service. On the other hand, the overall competition procedure is assessed as simpler than in the baseline PAR Monitor in the sense that it imposes minimum administrative burden on candidates. Nevertheless, the CSL does not give options to candidates to supplement missing documents (even though it happens in practice). Furthermore, the reasoning behind decisions of selection panels and information about annulled public competitions are not made publicly available.

The analysis of professionalism of senior civil service positions has not returned positive results, and it has even slightly worsened since the baseline PAR Monitor. Whereas the Law on Civil Servants was found to prescribe only partly competitive, merit-based procedures for the selection of individuals in these positions, it was not found to prescribe objective criteria for termination of their employment. In addition, ratio of eligible candidates per senior-level vacancy is very low. As in the baseline PAR Monitor, the duration of appointments to acting positions is not limited in practice and the civil service legislation is constantly breached in this regard. These (re)appointments of individuals in acting statuses, to fill in for vacant senior civil service positions, remain politically driven. Moreover, civil servants themselves believe there is a significant political influence on selection into senior positions. CSO representatives are even more sceptical in their responses to the extent that the percent of those who report that professionalism matters when it comes to senior managerial positions in civil service is close to 0.

Furthermore, the remuneration system is predominantly simply structured, and it clearly defines options for salary supplements. However, the online availability of information concerning remuneration system is limited and no citizen-friendly explanations of this system could be found. Finally, it is found that integrity and anti-corruption measures are only partially established and implemented in central administration. Again, there is a substantial mismatch in how civil servants and CSO representatives perceive integrity and anti-corruption measures. While the former are fairly sceptical, it can be said that the latter do not see these measures as effective or impartial at all.

Accountability: proactive information provision diminished; civil society concerned over safeguarding free access to information

Perceptions of CSOs in Serbia on the implementation and enforcement of the FOI right have marked a notable change in relation to the work of the Commissioner for Information of Public Importance and Personal Data Protection. In this cycle there was 45% of agreement among CSOs that the Commissioner sets high standards for FOI rights protection, compared to 60% of CSOs in the baseline PAR Monitor. Moreover, CSOs were far more reluctant to assess Commissioner's soft measures as effective with just around a quarter of agreement and 35 percentage points down looking back to the baseline PAR Monitor. At the same time, the Commissioner's ability to impose sanctions remains perceived by CSOs as quite ineffective in practice.

In this monitoring cycle, slightly fewer share of respondents than in the baseline one believes there are basic preconditions for FOI, in the sense that authorities record sufficient information in their work, and that exceptions to the public character of information are adequately defined in legislation – just below 25% of agreement for both. However, when asked whether these exceptions are adequately applied in practice, the agreement is negligibly low at 6%, going even lower than in 2017/2018 cycle (10%). As in the baseline PAR Monitor, CSOs who have practiced FOI requests are more approving on technical details which remain least contested – 78% confirm requested information is provided free of charge, but just over a half informs they are not asked to disclose reasons for requests. Somewhat lower share of respondents (39%) believe they receive information within legal deadlines, and in requested format, 5 percentage points down than in the last monitoring cycle.

CSO's views on handling of requests for information that can contain classified or personal data tell that they still have little experience with such requests, as in the 2017/2018 cycle. Overall, there is a low share of CSOs who confirm that non-classified parts are often or always released, and that they are never or rarely released to mislead a requesting person. Share of "do not know" responses amount to a one third and, despite some decline it remains the most frequently selected option.

On the provision of information proactively by public authorities, deficiencies from the baseline PAR Monitor, such as lack of efforts to present information in an approachable, citizen friendly fashion, or the lack of specific categories of information - annual work reports and citizen-friendly budgets, remain widely spread within sample authorities. On the other hand, information on scope of work, policy and legal documents, accountability lines, organisational charts or contact information remain the most complete and up to date across the sample, as in the previous cycle. Still, availability of policy papers and analysis is far less available this time around, with MEI, MPALSG and SEPA being the positive exceptions. Public authorities mostly disclose budgetary information in the similar vein as in 2017/2018 cycle – by providing basic budget plans and execution data on their websites or as part of the information booklets available online. In the entire sample of seven central administration authorities observed, MPALSG is singled out in a few cases for its citizen friendly approach - for presenting its budget plan amount for 2020, and for summarising its scope of work free of unnecessary bureaucratic jargon to the extent possible. When it comes to contacts for cooperation with civil society and other external stakeholders, sample authorities were largely proactive in disclosing complete and up-to-date contact points, except for GSG and SEPA. Finally, as only slight improvement since the baseline monitoring, three sample authorities disclosed at least a single open dataset online, with SEPA and MCM providing links to the governmental open data portal.

Service delivery: growing public recognition of service delivery, accessibility concerns remain within civil society

Results of the public perception survey point to an overall increased satisfaction of citizens with the services of the state administration, compared to the same survey conducted during the 2017/2018 monitoring cycle. Notable finding, on the other hand, is that citizens who interacted with the administration in the past two years tend to have somewhat less positive perception compared to the total population.

Most citizens recognise government efforts to simplify administrative procedures and believe that such efforts lead to improved service delivery. They find that contact with the administration has become easier in the past two years and that they need less time to complete an administrative procedure. Digitalization of the work of the administration and its services is also becoming more visible: most citizens are aware of e-services and have used them. Conversely, more than a third of citizens are not informed about availability of digital services, and two out of five citizens who know how to use them, claim that they have used them rarely or not at all in the previous two years.

A significant majority of the population believe they can provide feedback on the quality of individual service they use, while two out of five citizens either see no such possibility or do not have a clear opinion. Feedback mechanisms are used, yet to a limited extent: among those who recognize the existence of feedback channels, more than a half have either not used them in the past two years or find them too difficult to use. In parallel, providers of administrative services are insufficiently transparent about the received feedback. Even in rare cases when they conduct a satisfaction survey, there is usually no publication of any reports or analysis.

As in the PAR Monitor 2017/2018, negative opinion dominates the perception of civil society. Slow improvement of access to services for people with disabilities and the socially disadvantaged population remains one of the rooted problems in service delivery. CSOs believe that the providers of administrative services are inadequately territorially distributed and that one-stop shops that are being established throughout Serbia are not accessible to everyone. Their further discontent derives from service provision that disregards individual needs of vulnerable groups and civil servants that are not well trained on how to serve persons with disabilities. Somewhat more positive opinion regards the variety of channels for accessing services (e.g., in person, digitally) but most CSOs maintain that digital channels are not easily accessible.

Finally, information provision on administrative services saw an overall improvement compared to the baseline, but the practices of publishing necessary information for obtaining a service still varies depending on the type of information and the responsible service provider. On the one hand, users of sampled services can easily find details on who to contact to inquire about specific services, what documentation needs to be submitted and what the fee prices are. On the other hand, complete, up-to-date, and basic procedural information on how to obtain a service can still be improved, whereas citizen-friendly guidance remains sporadic despite some identified improvements, such as in the case of property registration. Notwithstanding growing digitalisation efforts and the number of services offered through the eGovernment Portal, monitoring found deficiencies in providing fully digitalised services, from request to receipt.

Public financial management: limited public access to budgetary information, SAI steps up its engagement with the public

In the budget transparency domain, monitoring outcome is the same as in the baseline PAR Monitor. Enacted annual budgets are publicly released and easily accessible from the webpage of the MoF, but the publication of budget execution reports is either irregular or unavailable. Monthly public finance bulletins allow public review of in-year budget execution, but these do not get published predictably following each month, and mid-year budget execution reports do not get published at all. In addition, in-year monthly reports display economic expenditures only without detailing them by organisations or government functions. Year-end reports, on the other hand, have become publicly available since the baseline monitoring cycle, as the National Assembly has passed overdue laws on final accounts of the budget. Nevertheless, year-end reports still do not inform on the Government's policy performance in different sectors. Citizen budgets are available

from the homepage of Ministry's website, but previous editions are unpredictably stored online. Finally, open data policy is not strictly followed but the MoF kept publishing macroeconomic and fiscal data in one of the machine-readable data formats.

Monitoring results for PIFC also mirror those from PAR Monitor 2017/18. The CHU produces and publishes consolidated reports on PIFC online, but their public release is often schedule late during the year (e.g., the 2019 report still undisclosed in November 2020). CHU has continued to publish quality review reports on internal audit too but this time not for two consecutive years. There was no major change when it comes to practices of ministries in publishing FMC information online – roughly a third of them publish at least single out of three information observed. In addition, CHU is assessed as even less proactive in communication towards the public than in the baseline monitoring. Finally, the National Assembly does not discuss consolidated reports on PIFC in plenary or in committees.

PPO and RCPRPP report on public procurement policy implementation and these are available on their webpages since 2013, and 2012, respectively, but not regularly in each case (a RCPRPP annual report missing at the time of monitoring) Reporting by the PPO, although easily accessible online, is assessed as partially citizen friendly as there are no summaries on the main procurement outcomes. The new public procurement portal is assessed as user-friendly but access to all documents is subject to registration. The majority of ministries regularly publish annual procurement plans and reports, but there are exceptions. Procurement data in open format is available from the public procurement portal which allows open data export for each section of the portal. Finally, in 2019, 7% of public procurement procedures were implemented using other than open methods.

The Supreme Audit Institution of Serbia (SAI) has enhanced its communication with stakeholders, resulting in the higher assessment vis a vis the baseline PAR Monitor. While communication strategy is still expected, visibility of SAI and its work is commitment under the Strategic Plan. Also, SAI keeps a job position for processing of citizens' tips and preparation of the content for external communication, among other tasks. Since the 2017/18 cycle, the SAI has used additional means of proactive engagement including tailored press publications, and awareness raising events, but major improvement has been noted in production of citizen-friendly summaries of audit reports, i.e., SAI has started producing one-page summaries for all audits reports. On the other hand, although anyone can still submit a question, a complaint, or any other input to SAI, no official channel, visible from its homepage has been introduced since the baseline monitoring. Finally, available data sources again did not return evidence that CSOS are consulted when for identifying risks in public sector or in audit planning.

To address the identified weaknesses, this report proposes recommended actions. The 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 2017/2018 PAR Monitor proved to be still highly relevant, a great number of them is repeated, and some slightly modified, to be more in line with changes in legal or institutional frameworks in Serbia, or to give them more clarity.

LIST OF ABBREVIATIONS AND ACRONYMS

ACC	Accountability	MEI	Ministry for European Integration
AP	Action Plan	MoF	Ministry of Finance
APIGP	Action Plan for Implementation of the Government Programme	MoI	Ministry of the Interior
BRA	Business Registers Agency	MPALSG	Ministry of Public Administration and Local Self-Government
BSL	Budget System Law	NAPA	National Academy for Public Administration
CAF	Common Assessment Framework	NPAA	National Programme for the Adoption of the Acquis
CHU	Central Harmonisation Unit	OBS	Open Budget Survey
CoG	Centre of Government	OECD	Organisation for Economic Co-operation and Development
CPR	Central Personnel Registry	OITE	Office for IT and eGovernment
CSL	Law on Civil Servants	OMT	Online PAR monitoring tool
CSO	Civil Society Organization	PAR	Public Administration Reform
EC	European Commission	PDC	Policy development and coordination
EU	European Union	PFM RP	Public Finance Management Reform Programme
ERP	Economic Reform Programme	PIFC	Public internal financial control
FAQ	Frequently asked questions	PPL	Public Procurement Law
FMC	Financial management and control	PPO	Public Procurement Office of the Government
FOI	Freedom of Information	PPS	Public Policy Secretariat
FS	Fiscal Strategy	PSHRM	Public Service and Human Resource Management
GAWP	Government Annual Work Plan	RCPRPP	Republic Commission for the Protection of Rights in Public Procurement Procedures
GSG	General Secretariat of the Government	RGA	Republic Geodetic Authority
HRM	Human Resource Management	SAI	State Audit Institution
HRMIS	Human Resource Management Information Systems	SCS	Senior civil servants
HRMS	Human Resource Management Service of the Government	SEKO	Sectoral Civic Society Organizations
IA	Internal audit	SEPA	Environmental Protection Agency
ID	Personal Identification Document	SIGMA	Support in Improvement in Governance and Management
IMPG	Inter-Ministerial Project Group	SOE	State-owned enterprises
ITC	International Telecommunication Union	UIS	Unified information system
LGAP	Law on General Administrative Procedure	VAT	Value Added Tax
LLC	Limited liability company	WB	Western Balkans
LPS	Law on Planning System	WCAG 2.0	Web Content Accessibility Guidelines
LSA	Law on State Administration	WeBER	Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform
MCM	Ministry of Culture and Media	WeBER 2.0	Western Balkan Civil Society Empowerment for a Reformed Public Administration



INTRODUCTION

I.1 PUBLIC ADMINISTRATION REFORM AND THE WESTERN BALKANS' EU INTEGRATION – WHY IS MONITORING IMPORTANT?

Since the publication of the first edition of the Western Balkan PAR Monitor in 2018, the Western Balkan region (WB) has continued slowly their path towards further democratisation and modernisation of its societies, implementing the necessary structural, economic, and social reforms to improve the lives of citizens. These reform processes were, from their onset, stimulated by aspirations of becoming members of the EU, and they continue to be driven by the EU integration process and its inherent conditionalities. Good governance lies at the heart of the European integration project, requiring public administrations to be professional, reliable and predictable, open and transparent, efficient and effective, and accountable to their citizens.

With the new strategy of the European Commission issued in early 2020, public administration reform (PAR) was reaffirmed as an area of fundamental reform in the EU's enlargement policy. Accordingly, PAR joined the areas of rule of law, economic governance, and the functioning of democratic institutions as the basic pillars of reform which will constitute the foundation for the overall assessment of progress of aspiring EU members.

The EU's framework for defining, guiding, and assessing administrative reforms in the context of enlargement has remained embedded in the set of Principles of Public Administration. Established in 2014, these principles, known as the "SIGMA principles" (since they are assessed regularly by the OECD's SIGMA programme)¹ offer a roadmap for EU 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,² 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

These principles, thus, constitute the common denominator of PAR for all EU aspirants, guiding the course of their reforms in the direction of EU membership.³

WeBER⁴ adopted the Principles of Public Administration as the main building block of its PAR Monitor for two main reasons. On the one hand, as a common denominator for PAR reforms in the region, the principles allow for comparisons across the region, and regional peer learning and peer pressure among the WB administrations. On the other hand, the principles guide reforms in these countries towards the fulfilment of EU membership conditionalities, thus helping their transformations into future EU member states.

An important consideration in designing WeBER's monitoring approach lies in the understanding that until the EU accessions of the WB region, 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. Simultaneously, civil society should 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,

1 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/>.

2 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>

3 SIGMA conducts regular assessments of the progress made by WB governments in their fulfilment of their principles. Across-the-board assessments (for all the six key areas) are conducted once every two-three years, and smaller-scale assessments are conducted in between for specific chapters that are evaluated as critical by SIGMA. For more information on SIGMA assessments, visit www.sigmaxweb.org.

4 Starting from December 2019, WeBER is being implemented under the title "WeBER2.0 - Western Balkan Civil Society Empowerment for a Reformed Public Administration".

local civil society actors should have a developed approach in identifying critical areas of intervention on which to focus their monitoring efforts.

Moreover, although EU conditionality is currently ensuring regular external monitoring and assessment of reforms progress, previous enlargements have demonstrated that some countries have backslid in their reforms post-accession, effectively moving away from good governance standards. In several countries, governments have decreased their standards of transparency, administrations have been re-politicised, and anti-corruption efforts have faded. WeBER's rationale is that only by empowering local non-governmental actors and strengthening participatory democracy at the national and local levels can pressure on governments be maintained to implement often painful and inconvenient administrative reforms in the post-accession period.

In order to contribute to the empowerment of local civil society actors, WeBER has initiated multiple awareness raising and capacity building initiatives since 2015. In addition to involving and gathering the knowledge of CSOs in the PAR monitoring process and the creation of the PAR monitor reports, a number of regional CSOs were trained for PAR monitoring and advocacy. Moreover, local CSOs who monitor specific PAR areas at the local level were provided with mentoring. In addition, multiple rounds of consultations on the implementation of the PAR Monitor were organised in the framework of the regional WeBER platform, and SIGMA's principles were introduced to a wider group of CSOs in the region. Today, WeBER continues to initiate novel, civil-society approaches to PAR such as piloting monitoring exercises of mainstreaming PAR in different policy sectors, and the creation of six parallel online portals through which citizens are invited to share their experiences in interacting with public administrations.⁵

Finally, the outbreak of the COVID-19 pandemic is an additional reminder of the importance of well-functioning public administrations able to exercise primary functions of serving the needs of citizens. Moreover, these outstanding circumstances bring 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.

Due to the impact of the COVID-19 pandemic, WeBER researchers produced PAR monitoring cycle 2019/2020 almost entirely as a remote exercise. This meant virtual communication and coordination within the WeBER research team and shifts in its approach of conducting field work (such as interviews and focus groups) in certain cases. Pandemic-related circumstances have, generally, had a limited impact on the project's findings, as most of the analysed practices took place in the pre-pandemic period (2019). Nevertheless, to some extent the pandemic slowed down the monitoring process as for a while it was more difficult to access public information with FOI requests. Other major obstacles, however, were not encountered.

1.2 THE PAR MONITOR METHODOLOGICAL APPROACH

■ EU principles as a starting point and common framework of reference

As mentioned above, 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.

⁵ The citizens portals for the six administrations are available at: <https://citizens.par-monitor.org/>.

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 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, as well as the rise of positive competition between governments. Last, but not least, it allows for the creation 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;
- In order 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 comprising several elements (essentially sub-indicators), elaborating various aspects of the issue addressed by the entire indicator. The entire design of indicators is quantitative, in the sense that all findings – based on both quantitative and qualitative research – are assigned numerical values. Findings are used to assess the values

of individual elements, assigning them total element scores of either 0 or 1 (for less complex assessments, such as those where a simple yes or no answer is possible) or 0 or 2 (for more complex assessments). Only integer values are assigned to elements.

Furthermore, for each element a weight of either 1 or 2 is applied. In principle, a weight of 2 is assigned to those evaluated as basic, key requirements in relation to a certain practice. A weight of 1 is applied to more advanced requirements, i.e. higher and more complex standards. For example, a weight of 2 would be applied for an element assessing a basic government reporting practice, whereas a weight of 1 would be applied to an element assessing whether the data in a report is gender sensitive or whether it is available in an open data format. Moreover, as most indicators combine different research approaches and data sources, in cases where perception survey findings are combined with hard data analysis, a weight of 1 is assigned to the former and a weight of 2 to the latter.

Finally, 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. The scoring and methodology details for each indicator are available on the PAR Monitor section of the WeBER website.⁶

■ Main methodological changes between the two PAR Monitors

Experience from the design of the monitoring methodology and the implementation of the first PAR Monitor resulted in the three main changes in relation to indicators in this monitoring cycle.

Firstly, in the Policy Development and Coordination area, the WeBER team has enhanced the indicator focusing on the quality of public participation (through various forms of public consultations) in policymaking. At first focusing only on perceptions of CSOs collected through an online survey, additional elements were added to assess the quality of public involvement in practice, examining a sample of public consultations on policy documents and legal acts. The improvement of this indicator also includes an assessment of governmental public consultation/participation portals through two new elements (sub-indicators). With this change, WeBER assessments in this PAR area were made more balanced in general, combining CSOs perceptions with hard evidence in each topic covered (which include governmental performance reporting, the use of evidence by central state administration bodies in policy development, and the transparency of governmental decision making).

Secondly, a couple of indicators that were initially planned for the first PAR monitoring cycle were at that time left out due to a combination of limited staff capacities and challenging workload. It was then agreed that a public-procurement-related indicator would be introduced in the second monitoring cycle. As a result, a new indicator has now been added to the Public Financial Management area, covering public procurement policy. Measured for the first time, this indicator on public procurement sets baseline values in this PAR Monitor.

Finally, one indicator in the Policy Development and Coordination area (focusing on the accessibility of legislation and explanatory materials to the public) was not included in this monitoring edition. The WeBER team reached a decision on this reduction at the beginning of this monitoring cycle. This decision came after internal deliberations on feedback received from CSOs in the region based on the survey conducted within the first monitoring cycle, and on the internal capacities of the research team to deal with an increased number of indicators. Consequently, in terms of the priority and urgency of addressing different PAR issues, it was decided that the indicator on legislation availability would give way to the indicator on public procurement.

⁶ WeBER project website: <http://www.par-monitor.org>. The methodology and individual indicator tables can be accessed within the PAR Monitor menu.

■ 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 baseline indicator values from the monitoring conducted in 2017/2018. 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 2019/2020 PAR Monitor allows us to monitor prevailing trends in the opinions of these stakeholder groups as compared to the baseline surveys.⁷

The “Master Methodology” document and the detailed indicator tables, all available on the WeBER website,⁸ 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 where needed.

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 www.par-monitor.org, under the heading “PAR Monitor”. 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 the baseline monitoring cycle, this monitoring applied a multi-layered quality assurance procedure to guarantee that the PAR monitoring findings are based on reliable and regionally comparable evidence. That process included both internal and external expert checks and reviews of data. The internal process of quality control comprised two main elements:

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.

The national reports also underwent standard internal review procedures by each WeBER partner organisation.

⁷ As it was not possible to create representative, random samples for the populations of CSOs and civil servants, these two surveys were distributed throughout these two populations, and analysis was done on the received complete responses. Since the samples in the baseline and in this second monitoring cycle are, thus, not identical, the results are not fully comparable. Yet, the overall response rates are solid, allowing us to compare the trends between the two survey cycles.

⁸ WeBER project website: <http://www.par-monitor.org>. The methodology and individual indicator tables can be accessed within the PAR Monitor menu.

■ PAR Monitor 2019/2020 timeframe

The monitoring exercise was conducted between February and December 2020. For the most part, monitoring focuses on practices implemented in 2019 and the first half of 2020. The exception are those indicator elements looking at regularity of governmental reporting practices, where 2018 or 2017 were included as the base years due to the governments' reporting cycles or the requirements of specific indicators.

The individual indicator measurements 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. Where situations have changed by the time of this report's writing, those changes will be reflected in the scores in the next biennial WeBER monitoring cycle and PAR Monitor 2021/2022.

■ Limitations in scope and approach

The main limitation facing this project stems from the fact that, for reasons which were elaborated above, 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.

Importantly, bearing in mind that there was no SIGMA assessment for 2020, for this PAR Monitor cycle WeBER researchers performed their own calculation of the ten SIGMA sub-indicators that WeBER uses in the area of Public Service and Human Resource Management. Done in accordance with SIGMA's methodology, the results of these calculations are the sole responsibility of the WeBER research team and the authors of PAR Monitor reports, and SIGMA/OECD cannot be held responsible for the outcomes of such calculations.

Lastly, despite the changes made in the PDC indicator on inclusiveness of policymaking (elaborated above), some of the principles are still approached from a rather perception-based point of view. This is mainly the case for 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 civil servants and CSOs). This is a deliberate component of the WeBER approach, and those indicators should be looked at as complementary to the assessments conducted by SIGMA for the same principles. Nevertheless, experience from the baseline monitoring cycle exposed limitations in certain cases when relying solely on perception data. An indicator on the inclusiveness and openness of policy making, which was previously entirely based on the perceptions of CSOs, was thus complemented with hard evidence so as to have a more balanced assessment, as described in the section on methodological changes. Such change brought about more objective assessment, as can be seen in this report's analysis. However, the new elements which analyse public consultation practices did not significantly change the picture previously created on the basis of CSO perceptions much, so that the indicator values have mainly changed from 0 to 1 in the region on average. In the period ahead, WeBER will consider changes if similar adjustments are needed in other indicators, 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 PAR Monitor cover the six administrations of the WB region, in accordance with the EU definition of the region.⁹ For BIH, WeBER has again focused predominantly 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 in BIH (such as entities).

⁹ European Commission's Enlargement package, and progress reports, are available at: https://ec.europa.eu/neighbourhood-enlargement/countries/package_en (last accessed on 1 June 2021).

I.3 STRUCTURE OF THE NATIONAL PAR MONITOR REPORT

This report follows a standard outline established for the baseline PAR Monitor, and is divided into six chapters, pertaining to the core areas of PAR: 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 in this National PAR Monitor largely rely on the latest European Commission progress report for Serbia for 2020, but also refer to other relevant sources. State of play is followed by the WeBER monitoring focus, describing the methodological steps in more detail, and methodological changes where applicable, 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 both WeBER monitoring cycles (for 2017/2018, and 2019/2020 cycle), allowing easy insight and comparison of monitoring results for the two PAR monitoring exercises. A summary of results for each area is given at the end of each chapter and presents key, succinct one-page findings and trends.

Finally, section on recommendations consists of two parts in this National PAR Monitor. Firstly, based on the detailed tracking, implementation status of recommendations proposed in the PAR Monitor 2017/2018 is given, with colour codes assigned and explanations 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 from this monitoring cycle, the report proposes actionable recommendations for the responsible government authorities. Since most of the recommendations from the 2017/2018 PAR Monitor proved to be still highly relevant, a great number of them is repeated and some slightly modified, either to adjust them to the changed national context or to make them clearer and more specific.



**STRATEGIC FRAMEWORK FOR
PUBLIC ADMINISTRATION
● REFORM**

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.

0 | 1 | 2 | 3 | 4 | 5

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

0 | 1 | 2 | 3 | 4 | 5

II.2 STATE OF PLAY IN STRATEGIC FRAMEWORK FOR PAR AND MAIN DEVELOPMENTS SINCE 2018

Since the baseline PAR Monitor, the Government initiated development of the new PAR Strategy for the period 2021-2030 at the end of 2019. Coordinated by the Ministry of Public Administration and Local Self-Government (MPLASG), the development process was planned to build on outcomes of the expired strategy adopted in 2014, and recommendations from its midterm evaluation report.¹⁰ For this purpose the special working Group was formed, with participation of all interested stakeholders, including early involvement of civil society representatives selected based on competition announcement.¹¹ Proposal of the strategy and its Action Plan for first five years of implementation, were also open for a public debate in December 2020, for which the report was published afterwards.¹² **The process of public consultations on the new PAR Strategy will be analysed in the next PAR Monitor edition for 2021/2022.**

The Government adopted the Public Administration Reform Strategy in April 2021. Its general objective is to improve the work of public administration in line with the European Principles of Public Administration with aim to provide high quality services to citizens and businesses.¹³ The accompanied Action plan for 2021-2025 outlines measures, activities, and performance indicators for three PAR areas - human resource management, service delivery, and accountability and transparency. Specific measures and activities for PFM, regulatory reform and public policy management, and reform of local self-government system are to be defined by separate, complementary policy programmes. However, PAR Strategy remains an umbrella document, and PAR monitoring will be based on monitoring the implementation of its Action Plan, and three policy programmes.¹⁴

When it comes to the expired PAR Strategy implemented until the end of December, the 2020 annual implementation report informs that the share of results achieved is 43% and of activities 35%. Administration's response to COVID-19, continuity in installing one-stop-shops at the local level, "e-ZUP" information system for ex officio collection of data from civil records are highlighted as overall reform's successes in 2020.¹⁵ Three-year review of the expired PAR Strategy implementation for 2018-2020 reports of 43% of result achieved, and 57% of activities implemented.¹⁶

The Ministry of Finance (MoF) revised in September 2019 the Public Finance Management Reform Programme (PFM RP) 2016-2020, with the Action plan for the July 2019-December 2020 implementation period (for external consultations on the revision of PFM RP, see section *WeBER monitoring results*).¹⁷ The annual report on PFM RP

10 External Evaluation of Serbian Public Administration Reform Strategy, Support to Public Administration Reform under the PAR Sector Reform Contract, Final Report, April 2019, available at: <https://bit.ly/2S8nBE0> (last accessed on 7 June 2021). Evaluation recommended continuation with good practices of engaging stakeholders in the development of new strategic framework, establishment of proper hierarchy with other PAR policy documents, provision of direction for an overall service delivery policy, and securing PAR funding.

11 Ministry of Public Administration and Local Self-Government, available at: <https://bit.ly/34S2msN> - public call announcement, <https://bit.ly/3uXHWsV> - results of selection process (last accessed on 7 June 2021).

12 Public debate announcement and report are available at: <https://bit.ly/3iAKZ7Z> (last accessed on 7 June 2021).

13 Public Administration Reform Strategy in the Republic of Serbia for the period from 2021 to 2030, Official Gazette NO. 42/2021, available at: <https://bit.ly/3gh8HTI> (last accessed on 7 June 2021)

14 Public Administration Reform Strategy, p. 265.

15 Annual Report on the Implementation of the Action Plan of the PAR Strategy for 2020, available at: <http://mduls.gov.rs/uprava-po-meri-svih-nas/strateska-dokumenta/?script=lat> (last accessed on 7 June 2021). At the time of writing this PAR Monitor the Annual report was not considered final and was pending adoption by the PAR Council.

16 Three-year review of achievements through the implementation of the Action Plan of the PAR Strategy for the period 2018-2020, available at: <https://bit.ly/3ge5KTR> (last accessed on 7 June 2021). At the time of writing this PAR Monitor the Three-year review was not considered final and was pending adoption by the PAR Council.

17 Ministry of Finance, available at: <https://www.mfin.gov.rs/sr/dokumenti2-1/program-reforme-upravljanja-javnim-finansijama-pfm-1> (last accessed on 7 June 2021).

implementation in 2019 informs that major challenges were of technical nature – insufficient administrative capacity, staff outflow, and delays in external, project support.¹⁸ The PAR Strategy 2021-2030, in the state of play for PFM, informs that, by July 2020, 44% of all PFM RP activities were implemented (40% partially, 16% not implemented).¹⁹

In May 2020, the MoF informed on the development of a new PFM RP for 2021-2025 that is supposed to carry on with the PFM reforms focusing on sustainable budget with stable public debt to GDP, improved processes of financial management and control, and audit, and linking budgetary and policy planning. Public debate on the proposal of the new PFM RP 21-25 has taken place during March and April 2021, with no published consultation report at the time of writing this PAR Monitor.²⁰ **The process of public consultations on the new PFM RP will be analysed in the next PAR Monitor edition for 2021/2022.**

Before the expiry of the Strategy for Regulatory Reform and Improvement of Policy Management for 2016-2020, the Public Policy Secretariat has commenced the work on a proposal for the successor Programme for Public Policy Management and Regulatory Reform.²¹ Besides state administration bodies, working group for the draft programme development includes members of professional organisations, businesses, and civil society. As mentioned earlier, once adopted, this Programme will constitute integral part of the new PAR strategic framework, same as new PFM RP. As for the expired Strategy, no official monitoring reports are available for the period 2018-2020 (see additional information in the section chapter *Policy Development and Coordination*). **The process of public consultations on the new Programme for Public Policy Management and Regulatory Reform will be analysed in the next PAR Monitor edition for 2021/2022.**

In addition, the Government has also adopted the eGovernment Development Programme for 2020-2022 was in June 2020 as part of the PAR agenda. Having as the overall goal of efficient and user-oriented administration in the digital environment, the Programme's objectives point to development of eGovernment infrastructure, legal certainty, availability of e-services to citizens and businesses, and open data increase in public administration. The Programme has undergone both public consultations and public debate processes (see section *WeBER Monitoring results*). The MPALSG reports that already after six months of implementation, performance indicator for the general objective of the Programme was successfully surpassed.²²

Finally, in the period after the PAR Monitor 2017/18, the Government adopted the Programme for Simplification of Administrative Procedures and Regulations ("e-Paper") for 2019-2021. This Programme intends to systematically approach improvements and simplification in administrative procedures, so that the public services to business sector are of higher quality.²³ The two-year Action plan of the Programme was open for public debate in early 2020. No report on either public debate or implementing the Action plan was available at the time of writing this PAR Monitor.²⁴

When it comes to monitoring and coordination, the new PAR Strategy 2021-2030 retains three-tier structure with MPALSG being at the expert and operational level of support, Inter-Ministerial Project Group (IMPG) at the intersectoral level of administrative coordination, and the PAR Council being the political, decision-making body.²⁵ The IMPG still envisages civil society participation through public competition. IMPG consists of framework group and specific sub-groups for coordination of thematic areas covered by the PAR Strategy AP. Remaining three areas, operationalised through policy programmes, are planned to be represented by respective coordinators. IMPG is planned to meet quarterly, with its rules of procedures yet to be adopted.

18 Report on the Implementation of Public Finance Management Programme 2016-2020 for January – December 2019, p. 5, available at: https://www.mfin.gov.rs/upload/media/oWXLAL_6016bad8ee693.pdf (last accessed on 7 June 2021).

19 Public Administration Reform Strategy for 2021-2030, p. 33.

20 Available at: <https://www.mfin.gov.rs/sr/propisi-1/javne-rasprave-1> (last accessed on 7 June 2021).

21 Public Policy Secretariat, available at: <https://bit.ly/39gGRVF> (last accessed on 7 June 2021).

22 43.75% average grade on the EU benchmark for eGovernment. See: Annual Report on the Implementation of the Action Plan of the PAR Strategy for 2020, p. 20. At the time of writing this PAR Monitor the Annual report was not considered final and its adoption by the PAR Council was pending.

23 Programme for the simplification of administrative procedures and regulations' ePaper', available at: <https://bit.ly/3uYuntc> (last accessed on 7 June 2021).

24 Available at: <https://bit.ly/2Sf90Xg> (last accessed 7 June 2021).

25 Public Administration Reform Strategy for 2021-2030, p. 262

According to Strategy, PAR Council remains central strategic body of the Government that provides strategic directions. Chaired by the Minister of Public Administration and Local Self-Government, and vice-chaired by the Minister of Finance, members are line ministers and heads of relevant state administration bodies.²⁶ Considering the width of reform, representatives of the Government of Autonomous Province of Vojvodina, and of the Standing Conference of Towns and Municipalities are planned for membership. Moreover, the Strategy proclaims publicity as the principle of the Council's work, to be achieved based on Law on Free Access to Information of Public Importance, and importantly, that the Council can, once a year, invite civil society representatives from the IMPG to take part in Council's sessions.²⁷ It is of note that while PFM reform coordination remains under parallel structure – technical secretariat within the MoF, and the steering board, the Proposal of the PFM RP informs on the need to integrate reporting with the one for PAR strategy AP.

Finally, in 2019, MPALSG launched the online PAR monitoring tool (OMT) that allows tracking PAR Strategy AP implementation progress over the years.²⁸ OMT has a section on PAR coordination and monitoring structures with meeting notes from PAR Council and IMPG sessions.

II.3 WHAT DOES WEBER MONITOR AND HOW?

Monitoring 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, as well as on the existence of PAR management and coordination structures at the political and administrative levels.

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

Principle 2: Public administration reform is purposefully implemented; reform outcome targets are set and regularly monitored;

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

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

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

26 Ibid, p. 263-264.

27 Ibid, p. 265.

28 Available at: <https://monitoring.mduls.gov.rs/> (last accessed)

WeBER monitoring cycles, findings from the baseline PAR Monitor 2017/2018 were carried over for strategic documents that did not undergo revision or were not updated at the time of WeBER monitoring.

For Serbia, therefore, the analysis under this indicator included:

- PAR Strategy Action Plan 2018-2020 (**results taken from the PAR Monitor 2017/2018**)
- Revised Public Finance Management Reform Programme and Action Plan for July 2019-December 2020
- E-government Development Programme 2020-2022, and
- Strategy for Regulatory Reform and Improvement of Policy Management System 2016-2020 (**results taken from the PAR Monitor 2017/2018**).

The monitoring of the participation of civil society in PAR implementation (in PAR coordination and monitoring structures) considered only the most comprehensive PAR strategic documents being implemented as units of analysis. The intention of this approach was to determine whether efforts exist to better facilitate monitoring and coordination structures in PAR agenda generally. As for the first indicator, 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

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Consultations with civil society are conducted when the documents are developed	2/4	2/4
E.2 Consultations with civil society are conducted in an early phase of the development of the documents	2/4	2/4
E.3 Invitations to civil society to participate in the consultations are open	2/4	2/4
E.4 Responsible government bodies are proactive in ensuring that a wide range of external stakeholders become involved in the process	0/2	0/2
E.5 Civil society is provided complete information for preparation for consultations	2/4	2/4
E.6 Comments and inputs received in the consultation process are considered by the responsible government bodies in charge of developing key PAR strategic documents	0/4	0/4
E.7 Responsible government bodies publicly provide feedback on the treatment of received comments	0/2	0/2
E.8 Responsible government bodies engage in open dialogue with civil society on contested questions	1/2	1/2
E.9 Consultations in the development of strategic PAR documents are open to the public	2/4	2/4
Total score	11/30	11/30
Indicator value (scale 0 – 5)²⁹	2	2

²⁹ 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.

Analysis of public consultation practices was done for the two strategic documents – eGovernment Development Programme 2020-2023, and the revised Public Finance Management Reform Programme (PFM RP). For other two sample strategic documents, implemented during the 2019/2020 monitoring – PAR Strategy AP 2018-2020, and the Strategy for Regulatory Reform and Improvement of Public Policy Management System, analysis from the first monitoring cycle was taken for the indicator calculation.³⁰

Table 1: Newly analysed PAR strategic framework for Serbia, and results taken from the baseline PAR Monitor 2017/18

	NEWLY ANALYSED	TAKEN FROM THE BASELINE PAR MONITOR
SRB	eGovernment Development Programme 2020-2022 Revised PFM Reform Programme 16-20 and Action Plan July 2019 - December 2020	PAR Strategy Action Plan for 2018-2020 Strategy for Regulatory Reform and Improvement of the Policy Management System

Monitoring shows that public consultations practices on PAR strategic framework did not improve since the baseline PAR Monitor. Whereas extensive consultations have been conducted for the eGovernment Development Programme, no evidence was found on proper consultations with external stakeholders, and the public, during the revision of the PFM RP.

Namely, the eGovernment Development Programme (the Programme) was adopted in June 2020,³¹ and the development process consisted of three phases of consultations. While the first phase was entirely internal, the second entailed *inter alia* four focus groups on user experience, with citizens, business sector, IT sector, and local self-governments, and from inputs of each group set of recommendations has been produced. Third phase involved public presentation and debate of the draft Programme.³²

None of the consultation phases explicitly mention consultations with wider civil society or duration of such consultations. The Programme informs that consultative process involved civil society and universities as stakeholders, through their participation in the governmental Coordination Council for eGovernment, which convened three times during the development of the Programme, with a participation of representatives of one CSO.³³ No further evidence suggests involvement, or proactive approach to a greater number of CSOs when the Programme was developed, either through the Coordination Council or otherwise.

Focus group discussions, involved citizens, businesses, and IT sector as target groups during the Programme drafting, and were implemented in December 2018 and January 2019. No evidence on open invitations for joining focus groups were found either. The interviews conducted during the monitoring confirmed that the Programme’s development was subject to wide consultative process, with internal and external stakeholders. However, there was no approach to civil society that would render consultations open and proactively advertised, either through website of sponsoring institutions, the eGovernment portal, or the former Office for Cooperation with Civil Society.³⁴

Nevertheless, available materials on the results of consultation process provide enough evidence to conclude that those external stakeholders involved were consulted in the early stage - focus groups results were used for the purpose of problem definition and state of play analysis, and work of the Coordination Council as used to define priorities and measures of the Programme. When it comes to ensuring that the diverse groups of external stakeholders are represented, as mentioned earlier, business entities and associations have participated

30 Miloš Đinđić, Dragana Bajić, National PAR Monitor Serbia 2017/2018, 2018, p. 29-34, available at: <https://www.par-monitor.org/par-monitor-reports-2017-2018-2/> (last accessed on 7 June 2021).

31 eGovernment Development Programme in Republic of Serbia for 2020-2022 with the Action Plan for implementation, available at: <https://bit.ly/2TQZVEp> (last accessed on 7 June 2021).

32 See State of Play Analysis in eGovernment in Republic of Serbia – results of consultations process, available at: <http://mduls.gov.rs/publikacije/> (last accessed on 7 Jun 2021).

33 The Government established the Coordination Council for the e-Government in June 2017, and the Decision on the establishment provides the list of members which includes three representatives of a single civil society organisation, and a number of representatives from universities and the Serbian Chamber of Commerce members, beside state bodies. The Decision on the Establishment of the Coordination Council for eGovernment, Official Gazette no. 104/2017-124, available at: <https://bit.ly/2TioHx6> (last accessed 7 June 2021).

34 Interviews with a MPALSG representative, and with CSO representative held on 3 November 2020.

in the Programme development. No evidence found on the involvement of other groups as per PAR Monitor methodology (trade unions, organisations focusing on gender equality, or organisations dealing with the people with disabilities). Interviews confirmed the information on scope of consultations and actors involved.³⁵

Furthermore, evidence available informs that feedback collected in different consultation phases was genuinely used to produce the final Programme. Results of consultation process, available online, present all the inputs from focus groups, although they do not specify particularly which inputs were used in the final version of the Programme.³⁶ The adopted Programme, though, lists inputs from individual focus groups in the section State of play o E-government in Serbia, informing whether recommendations from a target group in question were accepted or not (yes/no statements). From the Programme, and other publicly available documents, it cannot be fully determined whether this list is exhaustive and what was reasoning behind such decisions.

There were no outstanding contested issues during the Programme development. The interviews suggest that external stakeholders expressed certain concerns over the Programme being too ambitious, and that there were occasional differences in opinions between a participating CSO and responsible institutions over proposals of Programme measures, or their financing and responsibility for implementation. Generally, interviewees confirm these issues were quickly resolved.³⁷

Finally, the final draft of the Programme was open for comments of the public. The public call has been announced by the MPALSG, Office for IT and eGovernment, the former Office for Cooperation with Civil society, and the eGovernment portal, and public debate lasted from 7 until 28 October 2019.³⁸ Report on the public debate is available to the public, and though it does not indicate those who contributed, it displays all the comments received (individually or grouped together based on topics) with statements regarding their acceptance and justification.³⁹

PFM Reform Programme (PFM RP) for 2016-2020 revision has come about as the result of recommendations from SIGMA and the EC, and because its activities were mostly covering the first two years of the Programme.⁴⁰ The work on this revision started in May 2018 through joint workshops of the working group members. Before adoption, the MoF states that the PFM RP proposal was presented at the third PFM Policy Dialogue in March 2019, where annual Report on PFM RP implementation for 2018 was presented as too, adding that all stakeholders (civil society included) are invitees to the Policy Dialogue, including the one held in March 2019.⁴¹

For the PFM Policy dialogue from March 2019, the invitation has been sent through the Office for Cooperation with Civil Society, according to the revised PFM RP, and there was an opportunity to send comments in advance on the designated email address.⁴² The revised PFM RP also noted that “unfortunately, civil society is not developed enough in the area of PFM which consequently leads to very few comments and suggestions received through this email for improving the document.”⁴³

Yet, at the time of monitoring, there was no evidence on existence of open invitations to civil society to participate in the development of the revised PFM RP and its Action Plan, either through the MoF website or the eGovernment portal. Although proactively disseminated, the invitation for civil society sent through the former Office for Cooperation with Civil Society in March 2019, concerned PFM mentioned Policy Dialogue only, that had broader agenda (i.e. presentation of the annual report on the PFM RP implementation) and

35 Interviews with a MPALSG representative, and with a CSO representative held on 3 November 2020.

36 State of Play Analysis in eGovernment in Republic of Serbia – results of consultations process

37 Interviews with a MPALSG representative, and with a CSO representative held on 3 November 2020.

38 Public call for participation in the public debate – Office for IT and eGovernment, available at: <https://bit.ly/2TidBlt>, the Office for Cooperation with Civil Society (and its Facebook page), available at: <https://cutt.ly/tnUTkvL>, and <https://cutt.ly/ZnUR2WH>, MPALSG, available at: <https://cutt.ly/FnUTwno>, eGovernment portal, available at: <https://javnerasprave.euprava.gov.rs/javna-rasprava/204> (last accessed on 7 June 2021).

39 Public debate report is available at: <https://bit.ly/3w5Oh6V> (last accessed on 7 June 2021).

40 Revised PFM Reform Programme 2016/2020 with the Action Plan for July 2019 – December 2020, available at: <https://cutt.ly/AnUSN5X> (last accessed on 7 June 2021).

41 Revised PFM Reform Programme 2016-2020, p. 9.

42 Ibid.

43 Ibid.

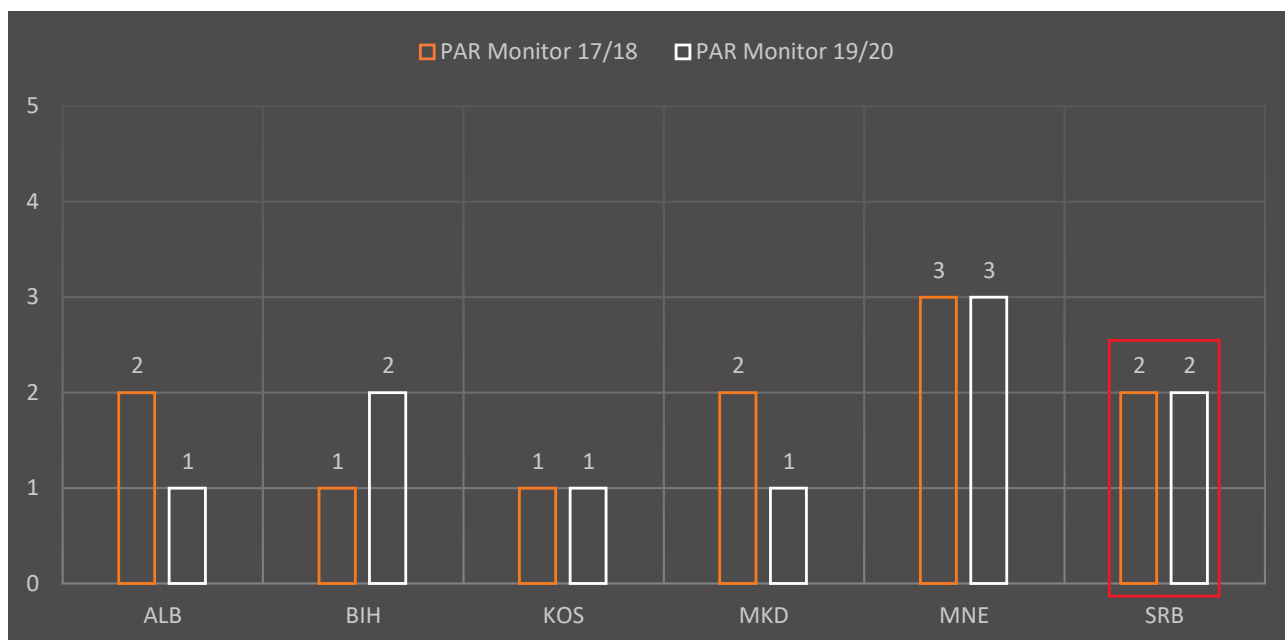
where revised PFM RP was presented as already finalised draft. Hence, there was no early involvement in the drafting phase of PFM RP revision as well.⁴⁴

That said, there is no evidence on actions to ensure that a wide range of external stakeholders becomes involved in the development process, and it cannot be determined with precision whether there were comments by CSOs, at the said PFM Policy Dialogue event from March 2019 or via designated email address, how these comments have been treated, and whether any contested questions have emerged.

Overall, analysis of consultation process for the eGovernment Development Programme, and PFM Reform Programme revision, did not affect the overall indicator value. While the eGovernment Development Programme was consulted early and with different target groups, which positively contributed to the Programme development, responsible bodies have not invited or approached civil society proactively. For the revised PFM RP, the evidence informs that only consultation that has been implemented was the one on the final draft of the document during PFM Policy Dialogue, with no further details on outcomes. The indicator value remains at 2, as in the baseline PAR Monitor.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 1: Indicator SFPAR_P1_I1: Use of participatory approaches in the development of key strategic PAR documents



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

⁴⁴ The Office for Cooperation with Civil Society, invitation to the third PFM Policy Dialogue, available at: <https://cutt.ly/VnUHulA> (last accessed on 7 June 2021). PFM policy dialogues are one-day events established in 2017 by the MoF for consulting/presenting reports on PFM RP implementation and other reform-related matters.

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

WeBER indicator SFPAR P2_4 I1: Civil society involvement in the PAR monitoring and coordination structures

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Administrative structures for PAR coordination and monitoring foresee an involvement of CSOs	2/2	2/2
E.2 Political level structures for PAR coordination foresee an involvement of CSOs	0/2	0/2
E.3 Format of CSO involvement in administrative structures for PAR coordination and monitoring	4/4	4/4
E.4 Format of CSO involvement in political structures for PAR coordination and monitoring	0/4	0/4
E.5 Involvement of CSOs is achieved based on an open competitive process	2/4	0/4
E.6 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	0/4	0/4
E.7 The format of meetings allows for discussion, contribution, and feedback from CSOs	2/4	2/4
E.8 CSOs get consulted on the specific measures of PAR financing	0/2	0/2
Total score	10/26	8/26
Indicator value (scale 0 – 5)⁴⁵	2	1

Same as in the baseline PAR Monitor 2017/18, CSOs involvement in PAR coordination and monitoring structures is ensured only at the administrative level of reform management. PAR management structures for the implementation of PAR Strategy AP 2018-2020, consisted of three levels: MPALSG as the expert and technical support, the Inter-Ministerial Project Group (IMPG) as the administrative, inter-ministerial level, and the PAR Council as political body. The Decision on establishing the IMPG from 2018 has clearly foreseen CSOs as representatives.⁴⁶ The same Decision recognises CSO representatives as full members, and the IMPG Rules of Procedures grant CSO representatives full and equal membership rights, i.e., there is no distinction from those members coming from governmental bodies.⁴⁷

The only major difference compared to the PAR Monitor 2017/18 has been found in the selection process of CSOs for the IMPG membership. As noted in the baseline PAR Monitor, CSOs leading the PAR sectoral group in the “SEKO mechanism” joined the first formation of the IMPG by invitation,⁴⁸ whereas their selection for the second IMPG mandate was based on similarly streamlined, but more open approach. Namely, in the preparations for the PAR Strategy AP for 2018-2020, a public call has been disseminated to all interested CSOs to participate in its development and, as the result, 12 CSOs have been selected to take part in the special working group. Upon completion of the work on the said AP, all participating CSOs have been eventually invited to become members of the re-established IMPG in 2018. In the end, the IMPG consisted of two appointed representatives from 11

45 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.

46 Decision on Establishing the Inter-Ministerial Project Group, 2018, available at: <https://bit.ly/3oEJl5R> (last accessed on 7 June 2021).

47 Available at: <https://bit.ly/3oEJl5R> (last accessed on 7 June 2021).

48 Sectorial Civil Society Organisations - the consultative structure for the programming of EU and bilateral donor assistance, available at: <http://www.sekomehanizam.org> (last accessed on 7 June 2021).

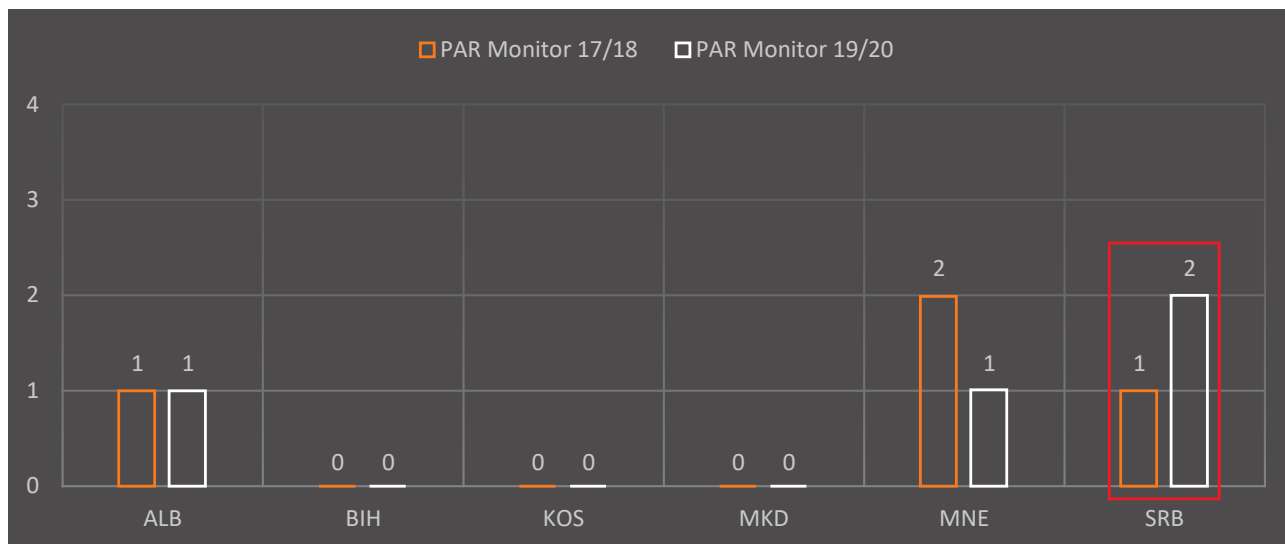
CSOs (member and deputy).⁴⁹ CSOs who are members of the IMPG have generally agreed that the selection was open and competitive, with no major downsides.⁵⁰ Therefore, although no additional public competition was organised for selecting civil society in IMPG, the fact that very same competition and selection process was used to select CSO to participate in the PAR AP development, and later on for monitoring its implementation was deemed as satisfactory in this PAR Monitor cycle.

Though, the IMPG sessions have been once again held irregularly since the baseline PAR Monitor. While three out of four meetings within the period of observation were held at least every 6 months, there was a 13-month gap between the third meeting in June 2019, and the fourth one in July 2020.⁵¹ It is worth noting that although the format of the IMPG sessions is formally open for discussion, comments, and feedback, CSOs still report that in practice they do not get consulted on crucial matters. For instance, CSOs from the IMPG report they cannot impact agenda setting or reform plans and believe that IMPG sessions served the purpose of legitimising (already made) political decisions on PAR.⁵² They also believe that the quality and content of the IMPG sessions do not adequately shape subsequent meetings since the form comes before substance.⁵³ Similarly, CSOs unanimously confirmed they do not get consulted on financial aspects of the PAR whatsoever, and that financing of reform, both from national and donor funds, lacks transparency.⁵⁴

Overall, there has been no major shift in the assessment of the CSO's participation in the PAR monitoring and coordination structures since the baseline PAR Monitor. Civil society is represented in the administrative body of PAR coordination only. Yet, regularity of its meetings is occasionally discontinued and CSOs believe that, as full-fledged members, they cannot make substantial impact in the work of the IMPG. Nevertheless, since selection of CSOs for membership in the renewed IMPG has been preceded by an open call, the indicator value has increased compared to the baseline monitoring, from 1 to 2.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 2: Indicator SFPAR_P2&P4_I1: Civil society involvement in the PAR monitoring and coordination structures



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

49 Decision on Establishing the Inter-Ministerial Project Group.

50 Focus group held on 28 December 2020.

51 All sessions since the establishment of the IMPG in October 2018 were analysed in this PAR Monitor: 1st session from 26 December 26, 2018, second from 14 March 2019, third from 4-5 June 4-5, 2019, and fourth from 17 July 2020, available at: <https://bit.ly/3oEJl5R> (last accessed on 7 June 2021).

52 Focus group held on 28 December 2020.

53 Focus group held on 28 December 2020.

54 Focus group held on 28 December 2020.

II.5 SUMMARY RESULTS FOR THE STRATEGIC FRAMEWORK FOR PAR AREA

The 2019/2020 monitoring cycle in Serbia found that the inclusion of civil society organisations (CSOs) in the development of PAR strategic documents was limited. Civil society and the public were consulted on one out of two key strategic documents observed in this cycle, i.e., in the development for eGovernment Development Programme 2019-2022, while no proper consultations were conducted for the development of the Revised Public Finance Management Reform Programme and its Action Plan for July 2019 - December 2020. When eGovernment Development Programme was drafted, the responsible Ministry organised early consultations with different target groups (focus groups with local self-governments, business, IT sector, donor community, citizens), and later public debate on the adopted proposal of the Programme, but involvement of CSOs was limited in all these phases. Report on consultation process presents all the inputs from focus groups, but it does not specify particularly which inputs were used (although, some of these inputs are listed in the final version of the Programme which provides an overview of whether they were accepted or not). Public debate report presents all the comments received (individually or grouped together based on topics), with their status of acceptance/rejection and justification. The monitoring also found little proactiveness on behalf of the responsible Ministry in ensuring that a wide range of external stakeholders are included in the process. Beside business associations, there was no involvement of trade unions, organisations focusing on gender equality, or on people with disabilities.

When it comes to the involvement of the civil society organisations in the PAR monitoring process, the findings resemble the baseline PAR Monitor 2017/2018. The Inter-Ministerial Project Group (IMPG), administrative body for PAR coordination and monitoring, is still the only one with the CSO membership. The notable change is that the selection procedure for CSOs to participate in the renewed IMPG was based on the results of a previously announced open call for the development of PAR Strategy AP 2018-2020. Although the format of the IMPG meetings nominally allowed for comments and contributions by civil society representatives, these meetings were neither held regularly, nor were the CSOs consulted on agenda setting or matters related to PAR financing.

II.6 RECOMMENDATIONS FOR STRATEGIC FRAMEWORK FOR PAR

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2018

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. Institutions should organise consultations with CSOs as early as possible in the development process of documents. Although modalities of early involvement of external stakeholders can differ - from consultation meetings or similar events, participation in working groups, or even online consultative forums – early consultations should serve to gather substantive inputs before the final drafts, and before the main policy directions are decided upon.	Partially implemented	PAR Monitor 2019/2020 findings show that early consultations have been held for eGovernment Development Programme only. ⁵⁵
2. Consultations need to be broadly advertised, and all interested CSOs need to have a chance to participate. For the former, announcements posted at least on one's own website, the E-government portal, the Office for Cooperation with Civil Society, and available social media channels (of the responsible body if applicable and of the Office) should become a universally applied standard. For the latter, restrictions to participate in consultations, if any, should be limited to only basic criteria and CSOs from local communities need to be included as much as possible.	Partially implemented	PAR Monitor 2019/2020 findings show that limited means were used for advertising consultations for PFM RP 16-20 revision and eGovernment Development Programme. ⁵⁶
3. Reports on consultation results should be produced as a rule and should be made public, clearly addressing all received inputs. To make full use of public consultation reports and increase trust in the process, it is recommended to address each comment individually, explaining the reasons behind accepting or rejecting it. Although addressing groups of comments/ inputs can be justified in certain cases, vague statements that do not clearly explain how a comment has been integrated into the adopted solutions or why it has been rejected, need to be avoided.	Partially implemented	Out of two analysed strategic documents, public debate report, and report on early consultations were produced for the eGovernment Development Strategy. ⁵⁷
4. Proactively addressing a diverse group of stakeholders representing various interests relevant for the PAR policy should become a regular practice. That is, all consultations should include invitations to organisations that focus on specific issues which should be treated as cross-cutting questions in this policy, especially those representing persons with disabilities, gender equality and anti-discrimination issues and the business community.	Partially implemented	Business entities were involved in development of the eGovernment Development programme (WeBER observes involvement of 4 stakeholder groups - business associations, trade unions, organisations focusing on gender equality and/or women organisations, organisations dealing with the people with disabilities). ⁵⁸

55 State of Play Analysis in eGovernment in Serbia, available at: <http://mduls.gov.rs/publikacije/> (last accessed on 7 June 2021).

56 Revised PFM RP for July 2019 - December 2020, available at: <https://bit.ly/3dvdxwg>, and State of Play Analysis in eGovernment and results of consultation process (last accessed on 7 June 2021).

57 MPALSG, public debate report, available at: <https://bit.ly/2S9NPGc>, and State of Play Analysis of eGovernment and results of consultation process (last accessed on 7 June 2021).

58 eGovernment Development Programme for 2019-2022 <https://bit.ly/31waEVF> (last accessed on 7 June 2021).

<p>5. The MPALSG should ensure that CSO contributions are meaningfully considered at both levels within the overall decision-making of the monitoring and coordination structure. Given that CSO involvement is limited to the administrative level, it is of utmost importance that their concerns and proposals are properly communicated to the political level body - the PAR Council, which holds the ultimate decision-making power in steering PAR.</p>	<p>Initiated (mid to long-term)</p>	<p>PAR Council did not review nor discuss civil society's views (IMPG members) during the PAR Strategy AP implementation for 2018-2020. PAR Strategy 2021-2030 provides possibility for the PAR Council to invite IMPG civil society members to partake in Council's sessions once a year.⁵⁹</p>
<p>6. Currently, civil society is not represented in the PAR Council, and introduction of a liaison representative, from among the CSO members of the IMPG, to facilitate closer ties with the PAR Council should be considered as a viable option to ensure that CSO messages are communicated to the political level. In the mid-term, however, the MPLASG should consider the formal membership of at least one CSO in the PAR Council, and all IMPG members should have an opportunity to participate in proposing and choosing a representative as a way to increase trust and transparency and to reduce discretion.</p>	<p>Initiated</p>	<p>PAR Council did not include any civil society representatives as members. Public Administration Reform Strategy provides possibility for the PAR Council to invite IMPG civil society members to partake in Council's sessions once a year.</p>
<p>7. MPALSG should place greater focus on the concrete issues and problems deriving from the current PAR implementation and from the PAR AP calendar. Instead of, or in parallel to, presenting the whole PAR monitoring report, attention should be devoted to the most pressing issues and the most problematic areas, particularly those related to citizen-facing aspects of administration: openness, transparency, responsiveness of administration and external accountability.</p>	<p>No action taken</p>	<p>PAR Monitor 2019/2020 findings show no evidence of such practice within IMPG. It is noteworthy that at the third IMPG meeting from June 2019, mid-term evaluation report of PAR Strategy implementation was discussed, together with future for PAR strategic framework development and for improvement of monitoring reports on PAR Strategy AP implementation.⁶⁰</p>
<p>8. Finally, it is important to ensure the consistency of the IMPG calendar, with at least one meeting every six months, and ideally one meeting every three months (as stipulated by the IMPG RoP). Having in mind the schedule provided in the RoP, failure to hold a regular meeting should be preceded by a written notice to all members stating the reasons and the measures to manage backlog.</p>	<p>Partially implemented</p>	<p>Since the baseline PAR Monitor, there have been four meetings of the IMPG. The first three were held regularly (every six months) with a 13-month gap between the third and fourth. PAR Strategy 2021-2030 foresees an IMPG session quarterly.⁶¹</p>

59 PAR Strategy 2021-2030, p. 265, available at: <https://bit.ly/2RvxuW> (last accessed on 7 June 2021).

60 Meeting reports from the IMPG sessions, available at: <https://bit.ly/3AknqXp> (last accessed on 7 June 2021).

61 Ibid.

PAR MONITOR 2019/2020 RECOMMENDATIONS

Most of the recommendations from the 2017/2018 PAR Monitor are still highly relevant and majority of recommendations is repeated. Some of the recommendations which are repeated 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 2017/2018

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.
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.
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.
4. Institutions responsible for PAR strategic framework should proactively and regularly involve a diverse group of stakeholders representing various interests relevant for the PAR policy.
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.
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.
7. MPALSG should ensure consistency of the IMPG calendar, with at least one session every six months, and ideally a session every three months.

New recommendations 2019/2020

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.
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.



**POLICY
DEVELOPMENT AND
● COORDINATION**

III.1 WEBER INDICATORS USED IN POLICY DEVELOPMENT AND COORDINATION AND COUNTRY VALUES FOR SERBIA

PDC_P5_I1: Public availability of information on Government performance



PDC_P5_I2: Civil society perception of the Government's pursuit and achievement of its planned objectives



PDC P6 I1: Transparency of the Government's decision-making



PDC_P10_I1: Use of evidence created by think tanks, independent institutes and other CSOs in policy development



PDC_P11_I1: Inclusiveness and openness of policymaking



III.2 STATE OF PLAY IN POLICY DEVELOPMENT AND COORDINATION AND MAIN DEVELOPMENTS SINCE 2018

The Strategy for Regulatory Reform and Improvement of Policy Management System 2016-2020, which aims to establish an efficient and effective policy management and legislative process based on evidence, proved to be too ambitious and returned modest results. The ex-post analysis of the Strategy outlines methodological constraints in measuring the level of achievement of specific goals, unrealistic planning, and capacity and responsibility issues over activities as key stumbling blocks.⁶² On top of that, the coordination and monitoring system for this strategy has never been fully set-up. The Government did not adopt the AP for 2018-2020 which meant there was no formal basis to continue implementing the Strategy. For these reasons, no official monitoring reports for this period exist. The PPS's calculation reveals that the implementation of the Strategy was under 50% on average for 2018-2020 period.⁶³ PPS is preparing a new multi-year programme for policy management and regulatory reform based on lessons from the ex-post evaluation, which is supposed to feed into the new PAR Strategy for the period 2021-2030 (see chapter on the *Strategic Framework for PAR*).⁶⁴ At the time of writing of this report, a new Public Policy Management and Regulatory Reform Programme was under development, as a hierarchically subordinated policy document to the new PAR Strategy.

Annual report on PAR Strategy AP 2018-2020 implementation for 2019, as well as the situation analysis in the new PAR Strategy, describe the results in PDC area in terms of completing the legal framework for coordinated, inclusive and evidence-based policy making, embodied in the Law on Planning System (LPS), and the Law on State Administration (LSA).⁶⁵ It is highlighted in the PAR Strategy AP report that an increasing number of policy documents were aligned with the methodology for policy management (85.5% in 2019 compared to 65% in 2018),⁶⁶ and notes that early public consultations have gained ground in the reporting period.⁶⁷

62 Ex-post analysis of the Strategy, available at: <https://bit.ly/3qKGiuf> (last accessed on 1 June 2021).

63 Ibid, p. 26.

64 More information available at PPS's website: <https://bit.ly/39gGRVF> (1 June 2021).

65 By adopting necessary bylaws: Decree on the Methodology for Public Policy Management, Policy and Regulatory Impact Assessment, and Content of Individual Public Policy Documents, Decree on the Medium-Term Planning Methodology, Rulebook on Good Practice Guidelines on Public Participation in the Preparation of Draft Laws and Other Regulations and Document; Guidelines on the Inclusion of Civil Society Organisations in Working Groups for Developing Public Policy Document Proposals or Draft regulations. Annual Report on Implementation of the Action Plan of the Public Administration Reform Strategy for 2018-2020, <https://bit.ly/3661Mca> (accessed on 1 June 2021).

66 Ibid, p. 17.

67 Ibid, p. 11.

Still, the EC highlights there are persisting shortcomings in ensuring that LPS adopted 2018 is fully adhered to. More specifically, it is critical to “ensure a strong quality control role of the Public Policy Secretariat to allow for the effective implementation of the law on the planning system” and it remains a concern that there is “no mechanism to verify that the Secretariat’s comments have been incorporated and that the final draft versions of laws and policy documents are compliant with the legislation.”⁶⁸

As mentioned in the baseline PAR Monitor, with the adoption of the LPS, together with the amendments to the LSA, public consultation process has been regulated in detail, starting with the notification by responsible bodies on commencing legal or policy drafting process, continuing with public consultations in early and all subsequent phases. The EC assesses that “the scope of public consultations has improved” but at the same time opined that the impact and consistency of applying public consultations “will need to be assessed in practice.”⁶⁹ This is reinforced by CSOs experience “that the time given for public consultations was still too short, or that their comments on draft laws were not given sufficient consideration and follow-up.”⁷⁰

Finally, in January 2020 the Government adopted the Guidelines on the Inclusion of Civil Society Organisations in Working Groups for Developing Public Policy Document Proposals or Draft Regulations, after the two-round consultations held by the former Office for Cooperation with Civil Society.⁷¹ These non-binding Guidelines focus on the selection procedures of civil society representatives, and the Government recommended state administration bodies to inform the public on the intent to form a working group when they start developing proposals.⁷² A new portal, eparticipacija.gov.rs, was in the process of launching at the time of writing of this report, as an important technological upgrade from the sub-domain of the eGovernment portal which had been used in the previous years. Although the functionalities of the new portal promise to improve the e-participation practices, their actual betterment will mainly depend on the actual use of the portal by government institutions, promotion in the public as well as the experience that participating citizens and organisations will have with its application.

As regards with the evidence-based policy making, there have been no major developments since the baseline PAR Monitor, and “data collection and its systematic use for policy and law-making has yet to improve across the administration.”⁷³ In order to attain coordinated and evidence-based approach, the EC suggests better coordination between the Ministry of Finance (MoF) and the PPS “has yet to be established to ensure that there are no discrepancies between financial impact assessments, which the Ministry of Finance coordinates, and financial information in the regulatory impact assessments.”⁷⁴ With the EU support, PPS and MoF jointly created two manuals to help public administration bodies adequately assess impact of policies and legislation, and to properly cost implementation of planning documents and legislation.⁷⁵ These manuals are available at the PPS website.⁷⁶

Similarly, there is no major change in the Government’s transparency, specifically in reporting practices, and decision-making at the official sessions. Namely, the Government does not fully release to the public reports on its core planning documents – the Government’s Annual Work Plans (GAWP), and the Action Plan for Implementation of the Government Programme (APIGP). In August 2020, the PPS published the ex-post analysis of implementing the APIGP which “presents the findings of APIGP coordination in the previous three cycles, as well as recommendations for improvement, primarily from the angle of wider social significance that APIGP holds.”⁷⁷ Nevertheless, since the baseline PAR Monitor, the National Programme for the Adoption of the Acquis (NPAA) remains among the very few governmental planning documents whose reports are

68 European Commission, Serbia Report 2020, p. 14, available at: <https://bit.ly/2JeEqbA> (last accessed on 2 June 2021)

69 Ibid, p.15.

70 Ibid, p.13.

71 With the enactment of the Law on Ministries (Official Gazette No. 128/2020), the Office for Cooperation with the Civil Society ceased to exist, whose scope of competence is transferred to the new Ministry for Human and Minority Rights and Social Dialogue. Available at: <https://bit.ly/3nXLeCr> (last accessed on 2 June 2021).

72 Conclusion on adopting the Guidelines on the Inclusion of Civil Society Organisations in Working Groups for Developing Public Policy Document Proposals or Draft Regulations, Official Gazette No. 8/2020, available at: <https://bit.ly/2Jc4x21> (last accessed on 2 June 2021).

73 European Commission, Serbia Report 2020, p. 13.

74 Ibid.

75 Two new manuals for policy management and development: <https://bit.ly/39jvqp8> (last accessed on 3 June 2021).

76 Available at: <https://rsjp.gov.rs/cir/dokumenti-kategorija-cir/prirucnici-cir/> (last accessed on 3 June 2021)

77 APIGP Ex-post analysis available at: <https://rsjp.gov.rs/cir/dokumenti-kategorija-cir/program-vlade-cir/> (last accessed on 3 June 2021).

regularly publicly disclosed.⁷⁸ In the meantime, reporting on all planning documents should benefit from the instalment of the unified information system (UIS) introduced by the LPS, where monitoring indicators are to be entered.⁷⁹ However, the UIS “has yet to carry out its intended function in the overall policy planning system.”⁸⁰

When it comes to the Government’s sessions, the EC restates that “minutes and conclusions of government sessions are not published.”⁸¹ Although this problem has been repeated for several years, a most recent development at the initiative of the World Bank Office in Serbia may advance its resolution. The “Joint Transparency and Accountability Initiative” was launched, bringing together a range of stakeholders – the Government, the business community, civil society, and donors – to identify priority gaps and opportunities for improving transparency and eventually to monitor the progress being made. The Organisational Committee was formally established on 9 June 2021, comprising high-level representatives from all relevant public authorities, civil society, and the Serbian Chamber of Commerce. Through its three main thematic areas of fiscal transparency, proactive transparency and strengthening accountability, this initiative will, among other things, work towards increasing the transparency of the Government sessions.

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. As explained in the introductory chapter, unlike in the baseline PAR Monitor 2017/2018, SIGMA Principle 12 was not included in this monitoring cycle, and consequently an indicator on the accessibility of legislation was not measured.⁸²

The first indicator measures the extent of openness and availability of information about governments’ performance to the public, through analysis of the most comprehensive websites through which governments communicate their activities and publishes 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.

78 European Commission, Serbia Report 2020, p. 15.

79 Article 47 of the LPS introduce the UIS as an electronic system for planning, monitoring, policy coordination, and reporting, Official Gazette No. 30/2018, available at: <https://bit.ly/3qNA5hd> (last accessed on 3 June 2021).

80 European Commission, Serbia Report 2020, p. 14.

81 Ibid, p.15.

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

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 second half of June and the beginning of August 2020 using an online surveying platform.⁸³ A uniform questionnaire with 28 questions was used throughout the region, ensuring an even approach in survey implementation. It was disseminated in local languages through the existing networks and platforms of civil society organisations with large contact databases, and through centralised points of contact such as governmental offices in charge of cooperation with civil society. To ensure that the survey targeted as many organisations as possible in terms of types of organisations, geographical distribution, and activity areas, and hence be representative as much as possible, additional boosting was done where needed to increase overall responses. A focus group with CSOs served to complement survey findings with qualitative information.

The third indicator measures the transparency of decision-making by the government (in terms of the Council of Ministers), combining survey data on the perceptions of civil society with analysis of relevant government websites. Besides looking for published information on government decisions, the website analysis considers the completeness, citizen-friendliness, timeliness, and consistency of information. Monitoring was done for each government session in a six-month period - the last three months in the calendar year preceding the monitoring (2019), and first three months in the monitoring year (2020), except for the timeliness of publication, which is compared with all government sessions in the period of three months from the start of monitoring (roughly from the beginning of March until beginning of June 2020).

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

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 survey, but also additional qualitative data gathered through the analysis of a sample of public consultations as well as assessments of online governmental portals used for public consultations. More precisely, in this PAR Monitor this indicator was enhanced with the addition of qualitative document analysis of the scope and impact of public consultations on policy documents and legislation adopted in the second half of 2019, the availability and quality of reporting on public consultations, functionalities of the public consultation portals, and proactiveness of information provision by the responsible institutions.

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

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

WeBER indicator PDC_P5_I1: Public availability of information on Government performance

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 The government regularly publishes written information about its activities	0/4	0/4
E.2 The information issued by the government on its activities is written in an understandable way	0/2	0/2
E.3 The information issued by the Government is sufficiently detailed, including both quantitative data and qualitative information and assessments	0/4	0/4
E.4 The information issued by the Government includes assessments of the achievement of concrete results	0/4	0/4
E.5 The information issued by the Government about its activities and results is available in open data format(s)	0/2	0/2
E.6 The information issued by the Government about its activities and results contains gender segregated data	0/2	0/2
E.7 Share of reports on Government strategies and plans which are available online	2/2	0/2
Total score	2/20	0/20
Indicator value (scale 0 – 5)⁸⁴	0	0

Overall, space for public scrutiny of Government's activities remains very limited, with no visible improvements since the baseline PAR Monitor. Though the Government does publish press releases on a weekly basis, but its annual reports are not regularly revealed to the public. At the time of measurement, for instance, no reports on implementing the Government's Annual Work Plan (GAWP) could be found for the two consecutive annual reporting cycles, i.e., the report for 2017 was missing.

In addition, the analysis finds that the 2018 report, same as the annual reports analysed in the previous monitoring cycle, was written in an overly bureaucratic language.⁸⁵ The performance of the Government is the object of the report only in the introduction part, and even in this section there is no information about how the Government worked as a system. The writer paraphrases legislation and introduces further sections, which are given by each ministry individually. This is then further broken down to individual reports of special organisations and (government) services. On a more positive note, press releases are predominantly written in an understandable language.⁸⁶

The information issued by the government cannot be assessed a sufficiently detailed either. As in the baseline PAR Monitor, annual reporting essentially focuses on legislative activities and deals with the comparison between what had been done, on the one hand, and what was planned in the GAWP, on the other. However, as mentioned above, the report only describes the performance of central administration bodies and does not assess achievement of concrete results of the Government as a whole. Another issue is that information from report on the GAWP implementation, or other information about Government's activities, is not published in open data, or gender-segregated format whatsoever.

⁸⁴ 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.

⁸⁵ Annual Report on the Work of the Government for 2018, available at: <https://bit.ly/3yj4x52> (last accessed on 3 June 2021),

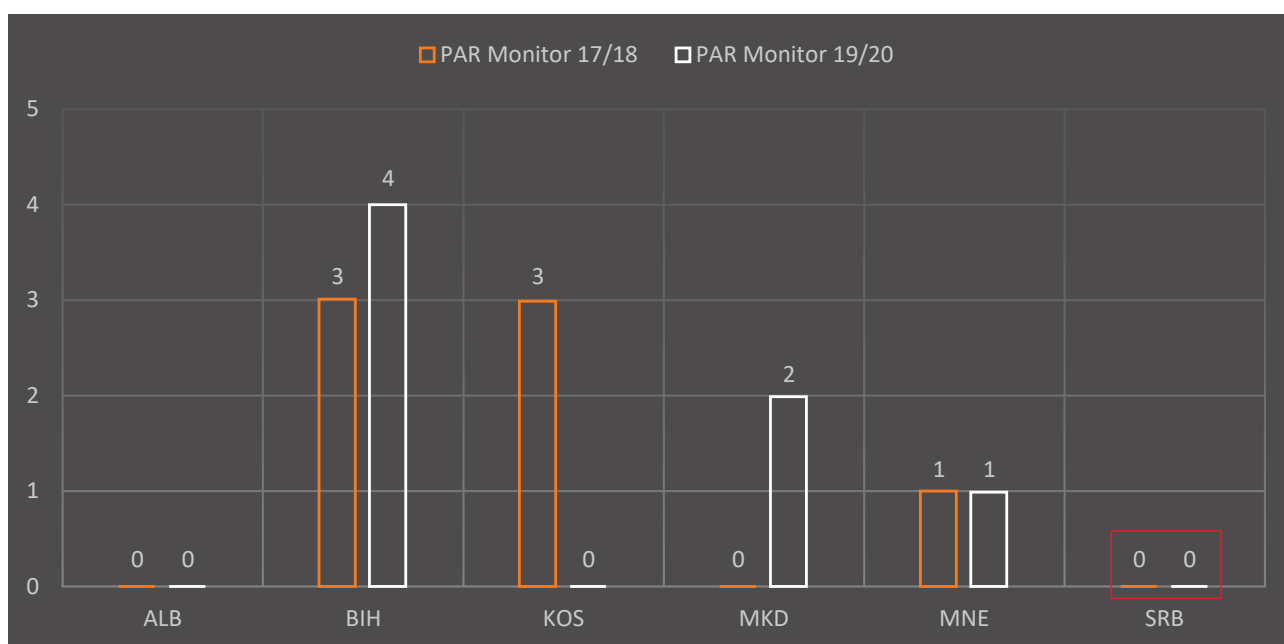
⁸⁶ Press releases of the Government available at: <https://www.srbija.gov.rs/sekcija/249/saopstenja-vlade.php> (last accessed on 3 June 2021).

Finally, it is important to note that, unlike in the PAR Monitor 2017/18, the analysis found a good share of reports on central planning documents of the Government to be available online, namely for the Economic Reform Programme (ERP) 2020-2022, the GAWP for 2018, National Programme for the Adoption of Acquis of the EU (NPAA) 2018-2021, Fiscal Strategy (FS) 2020-2022.⁸⁷ The only report of the analysed documents which could not be found online at the time of measurement was the one for the Action Plan for Implementation of Government Programme (APIGP) for 2019.⁸⁸

Overall, there has been no improvement since the baseline PAR Monitor on how the Government publishes and presents information on its performance to the public, and consequently there was no change in the indicator value for Serbia. Written information that is regularly disclosed to the public is still found in press releases only, whereas annual reports on the work of Government are irregularly published and lack more substantive information on the Government's results. Also, the Government did not release any data in open or gender-segregated format since the last monitoring cycle. As the only positive step, there was a higher share of reports on governmental central planning documents available online compared to the 2017/18 cycle.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 3: Indicator PDC_P5_I1: Public availability of information on Government performance



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

⁸⁷ Reports for 2019 were observed as the last full reporting year at the time of monitoring, except for report on GAWP since the official deadline to produce 2019 report did not pass, and 2018 reporting was observed instead. Reports on the NPAA implementation are released on a quarterly basis, and at the time of monitoring there were publications for the first three quarters of 2019, available at: <https://bit.ly/36dN9Ts>; ERP progress reports are provided as annexes of the latest ERP document versions (e.g., ERP 2020-2022 provides a report on the ERP 2019-2021), available at: <https://bit.ly/3xk2sGa>; finally, Fiscal Strategies adopted every year provide analysis of macroeconomic and fiscal trends for previous years which is considered sufficient to assess that the Government reports for the monitored period, available at: <https://bit.ly/2TF20n7> (last accessed on 3 June 2021).

⁸⁸ An "ex-post analysis" of the APIGP, which is essentially a report on this document, was published at a later stage.

WeBER indicator PDC_P5_I2: Civil society perception of the Government's pursuit and achievement of its planned objectives

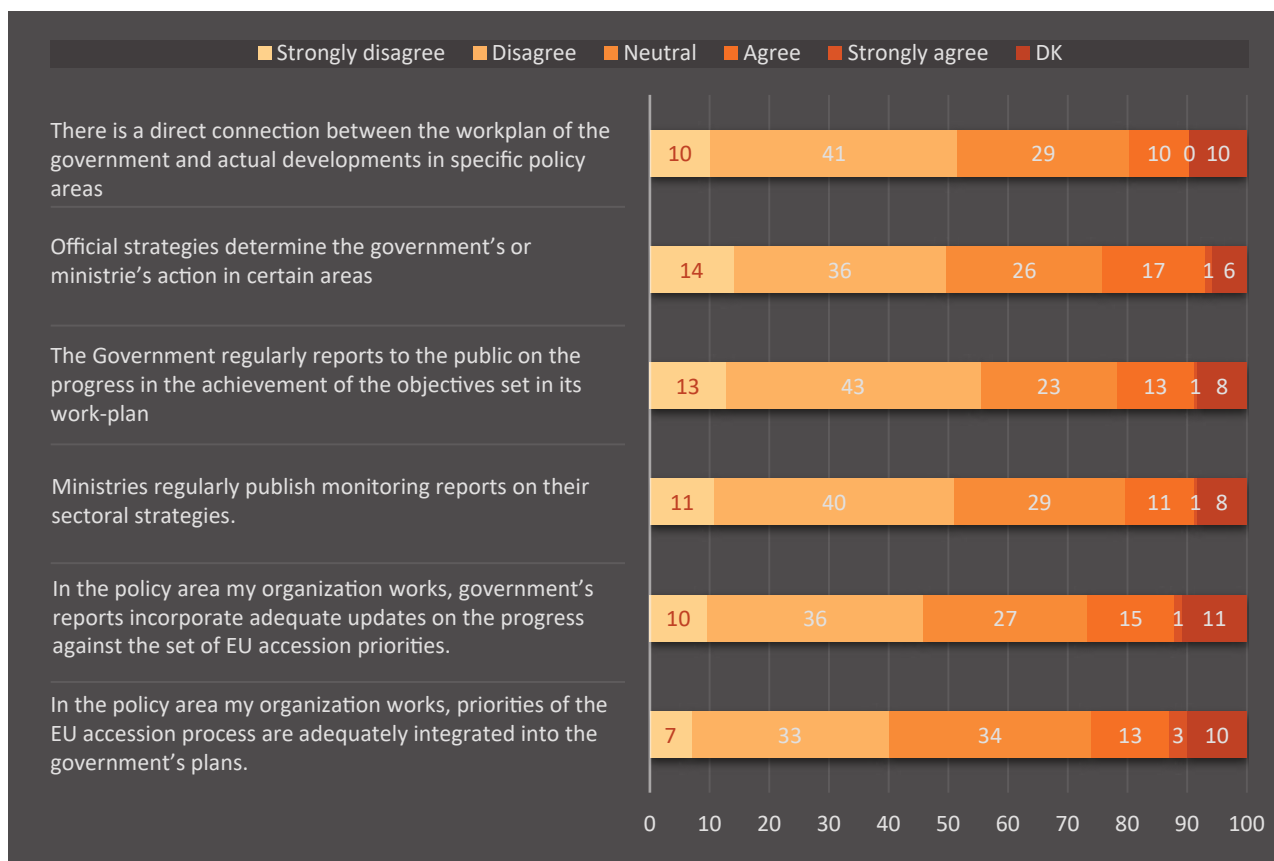
Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 CSOs consider government's formal planning documents as relevant for the actual developments in the individual policy areas	0/2	0/2
E.2 CSOs consider that the Government regularly reports to the public on progress against the set objectives	0/4	0/4
E.3 CSOs consider that official strategies determine governments' or ministries' action in specific policy areas	0/2	0/2
E.4 CSOs consider that the ministries regularly publish monitoring reports on their sectoral strategies	0/4	0/4
E.5 CSOs consider that the EU accession priorities are adequately integrated into the government's planning documents	0/2	0/2
E.6 CSOs consider that the Government's reports incorporate adequate updates on the progress against the set EU accession priorities	0/2	0/2
Total score	0/16	0/16
Indicator value (scale 0 – 5)⁸⁹	0	0

In keeping with the findings of the baseline monitoring, civil society perceptions regarding the extent to which the Government pursues and achieves its planned objectives remains highly negative. Results from the CSOs surveys between the two monitoring cycles are not directly comparable, since it was not possible to assure an identical sample, however, one can follow trends over time. More specifically, half of the surveyed CSOs disagree that there is a direct connection between what the Government plans to do and what indeed happens in specific policy areas, almost identically to the previous monitoring cycle (chart 1). On the other hand, agreement on this question stands at only 10%. A slightly higher level of agreement (18%), but with the same level of disagreement (50%) is recorded on the question of whether strategies determine the Governments' or ministries' actions in specific policy areas. A somewhat lower percentage of neutral and "don't know" answers on this question indicates that CSOs are more directed towards content strategies and similar policy documents in their work than on the Government's workplan, which – due to its low implementation rate – bears little practical value and significance.

CSOs remain negative when asked if the Government regularly reports to the public on the implementation of its work plans, and if ministries regularly do so on implementing sectoral strategies, with over 50% disagreeing and only a small proportion showing agreement (12-13% of agreement in this cycle, compared to roughly 16% in the baseline PAR Monitor). Surveyed organisations are overall slightly less sceptical when asked if reports and plans of the Government properly reflect EU accession related priorities, with somewhat below half disagreeing and 16% agreeing with both statements. While these results are similar to those found in the previous monitoring cycle, there is an overall trend of increasingly negative civil society perception on these matters. Considering the persistently poor practices of the Government's reporting found in the previous indicator, increasingly unfavourable perception of the civil society comes as little surprise.

⁸⁹ 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.

Chart 1. Civil society perception of the Government's pursuit and achievement of its objectives (%)

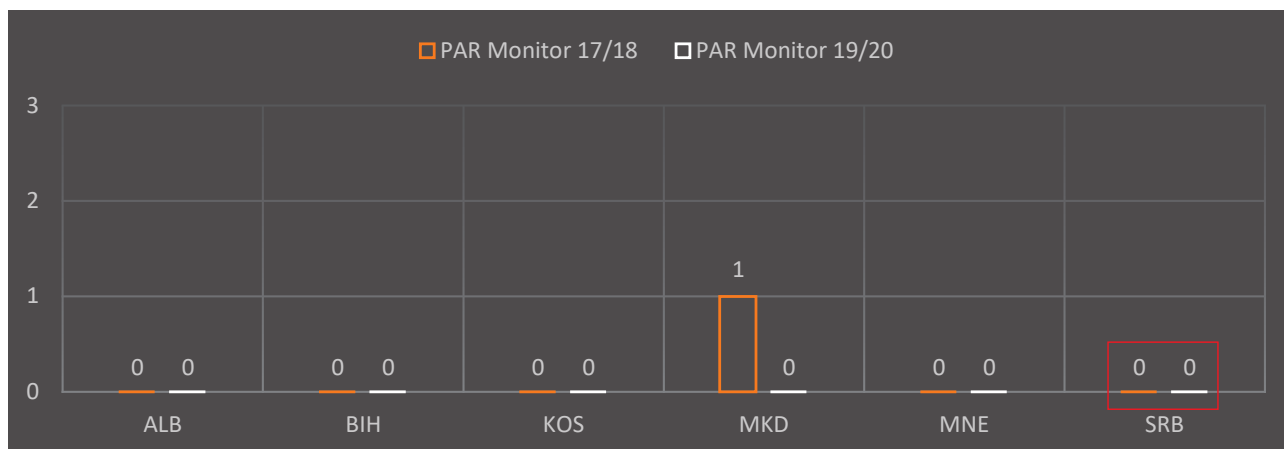


Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, N=157.

Overall, civil society's mostly negative perception did not change since the baseline PAR Monitor on all observed aspects of governmental planning and reporting. Regularity in publishing reports, either by the Government or ministries, is perceived as low, the same as the relevance of the Government's workplans and sectoral strategies for actual developments in policy areas of interest for surveyed CSOs. These highly disapproving perceptions are only slightly less negative on questions related to integration of the EU accession priorities in governmental plans and reports. Nevertheless, on all statements under this indicator, the level of agreement is below a fifth of respondents.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 4: Indicator PDC_P5_I2: Civil society perception of the Government's pursuit and achievement of its planned objectives



PRINCIPLE 6: GOVERNMENT DECISIONS ARE PREPARED IN A TRANSPARENT MANNER AND BASED ON THE ADMINISTRATIONS' PROFESSIONAL JUDGEMENT

WeBER indicator PDC_P6_I1: Transparency of the Government's decision-making

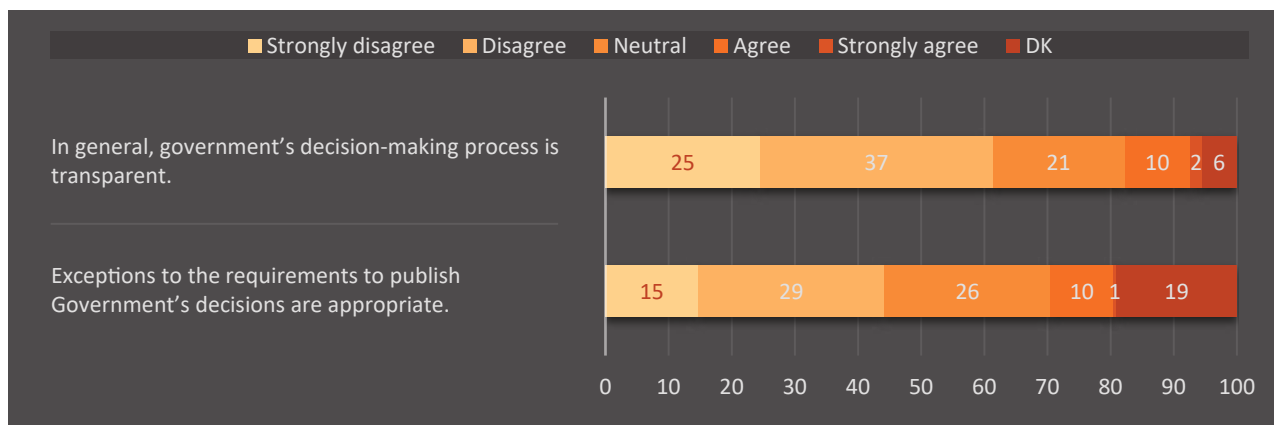
Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 CSOs consider government decision-making to be generally transparent	0/2	0/2
E.2 CSOs consider the exceptions to the rules of publishing Government's decisions to be appropriate	0/2	0/2
E.3 The Government makes publicly available the documents from its sessions	0/4	0/4
E.4 The Government communicates its decisions in a citizen-friendly manner	2/4	2/4
E.5 The Government publishes adopted documents in a timely manner	2/4	2/4
Total score	4/16	4/16
Indicator value (scale 0 – 5)⁹⁰	1	1

Analysis of the transparency of decision-making procedures by the Serbian Government, through the indicator comprising two perception-based and three document-based elements, paints only a slightly better picture than the previous indicators looking at transparency of government's planning and reporting practices. The CSO perceptions remain negative in this indicator, too, while analysis of documents related to the Government's decision-making reveal presence of certain elements of transparency, though with important limitations.

⁹⁰ 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.

Repeating unfavourable perceptions from the 2017/18 cycle, almost two thirds of surveyed CSOs are of the opinion that the government’s decision-making processes lack transparency, while somewhat below half (44%) disagree that exceptions from the requirement of publishing Government’s decisions are appropriate (chart 2). Only around 1 in 10 surveyed CSOs express a positive view on either of these two questions, which does not stand out greatly from the baseline PAR Monitor when 13% and 10% agreed on the same statements. On the latter question, there is a noticeable increase in the share of neutral and “don’t know” answers, indicating lower level of awareness by CSOs regarding types of documents and decisions from Government sessions that ought to be published.

Chart 2. CSO perception of the transparency of decision-making processes of the government (%)



Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, N=163.

Monitoring of the actual publication of basic documents from the sessions of the Government shows a persistent trend of treating these deliberations as a matter that does not greatly concern the public.⁹¹ The only documents from these sessions that do get published in majority of cases are press releases and certain types of adopted acts - law proposals, policy documents such as strategies and programmes, bylaws, and decisions (table 7). Yet – and in keeping with the finding from the previous monitoring cycle – a significant share of acts passed by the Government at each session does not get published either on the website or in the Official Gazette. This is the case with the Government’s conclusions, which have a general publication exception in the Government’s Rules of Procedure, although without a clear legal basis for such a block exemption. Moreover, and same as in the baseline monitoring, agendas and minutes of the Government’s meetings remain almost completely unknown to the public, as the only hints about the agenda can be made based on press releases and those acts that do get published. It should be noted that most of the observed sessions of the Government from March 2020 were held during the COVID-19 pandemic outbreak and proclaimed state of emergency in Serbia. In this period, the Government convened more frequently than it is usually the case.

⁹¹ Monitoring covered a period of the six months - last three months in the calendar year preceding the monitoring, and first three months in the monitoring year. In this period, researchers observed documents published for each government session. In total, monitoring covered 56 government sessions held in the period 1 October 2019 - 1 April 2020. Information on sessions of the incumbent Government is available at: <https://bit.ly/36ac3U2>, and of the previous governments at: <https://www.srbija.gov.rs/dokumenti/2430> (last accessed on 5 June 2021)

Table 2: Availability of materials from the Government's sessions, in the period between 1 October 2019 - 1 April 2020

Session	Date	Agenda	Minutes	Documents	Press
182	3 October 2019	x	x	√	x
183	10 October 2019	x	x	√	√
184	17 October 2019	x	x	√	√
185	22 October 2019	x	x	√	x
186	24 October 2019	x	x	√	√
187	31 October 2019	x	x	√	√
188	2 November 2019	x	x	√	x
189	7 November 2019	x	x	√	√
190	13 November 2019	x	x	√	√
191	No information	No information	No information	No information	No information
192	21 November 2019	x	x	√	√
193	28 November 2019	x	x	√	√
194	No information	No information	No information	No information	No information
195	No information	No information	No information	No information	No information
196	4 December 2019	x	x	√	√
197	6 December 2019	x	x	x	√
198	No information	No information	No information	No information	No information
199	12 December 2019	x	x	√	√
200	No information	No information	No information	No information	No information
201	16 December 2019	x	x	√	x
202	20 December 2019	x	x	√	√
203	24 December 2019	x	x	√	x
204	26 December 2019	x	x	√	√
205	30 December 2019	x	x	√	√
206	9 January 2020	x	x	√	√
207	17 January 2020	x	x	√	√
208	21 January 2020	x	x	√	√
209	28 January 2020	x	x	√	x
210	30 January 2020	x	x	√	√
211	6 February 2020	x	x	√	√
212	13 February 2020	x	x	√	√
213	20 February 2020	x	x	√	√
214	No information	No information	No information	No information	No information
215	27 February 2020	x	x	√	√
216	5 March 2020	x	x	√	√
217	10 March 2020	x	x	x	√
218	11 March 2020	x	x	x	√
219	12 March 2020	x	x	√	√

220	13 March 2020	x	x	x	√
221	13 March 2020	x	x	x	√
222	14 March 2020	x	x	x	√
223	15 March 2020	x	x	x	√
224	15 March 2020	x	x	√	√
225	16 March 2020	x	x	x	√
226	17 March 2020	x	x	√	√
227	17 March 2020	x	x	x	√
228	18 March 2020	x	x	x	√
229	19 March 2020	x	x	√	x
230	19 March 2020	x	x	√	√
231	20 March 2020	x	x	√	√
232	21 March 2020	x	x	√	√
233	22 March 2020	x	x	√	√
234	24 March 2020	x	x	√	√
235	26 March 2020	x	x	√	√
236	28 March 2020	x	x	√	√
237	31 March 2020	x	x	√	√
Total	56	0	0	40	43

Source: <http://www.srbija.gov.rs/>

The materials that do get regularly published, such as press releases, are partially communicated in a citizen-friendly manner. While press releases are for the most part written in a simple language, avoiding unnecessary formal terminology and are accessible within three clicks from the homepage of the Government's website, the lack of other types of basic documents makes it impossible to assess such communication as fully citizen friendly.

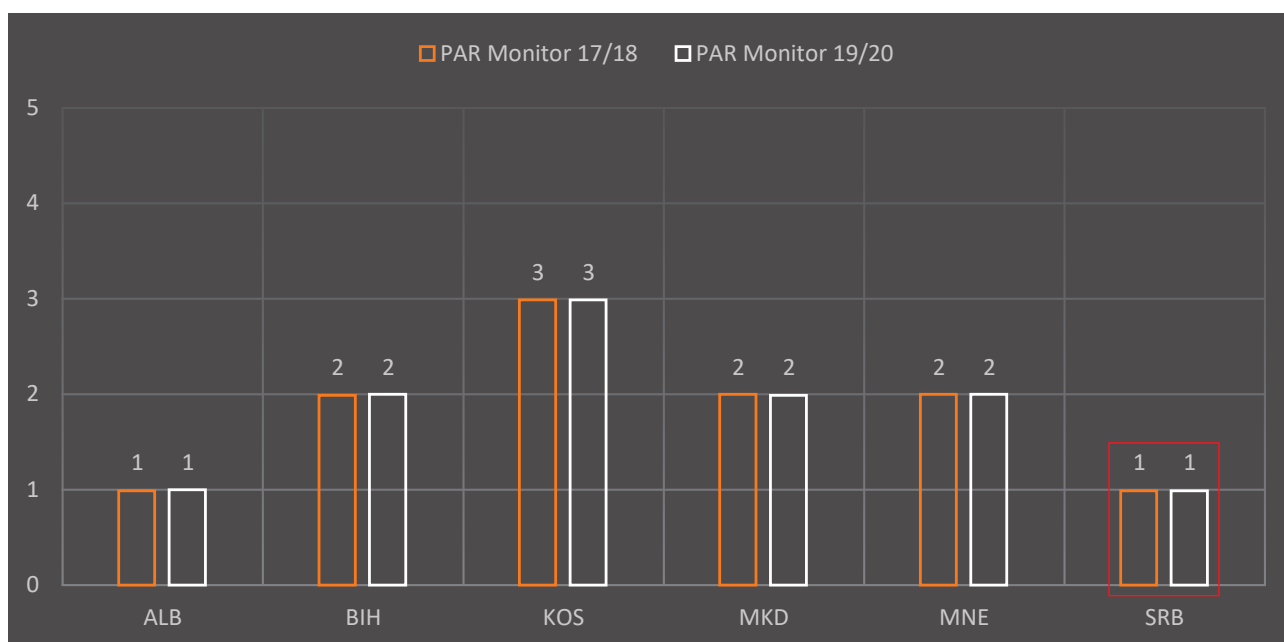
Finally, repeating the assessment from the PAR Monitor 2017/18, timeliness of the publication of information from the Government sessions is also only partial.⁹² Whereas those documents that do get publicly disclosed normally appear on the Government's website within one week from adoption, some cases were observed where either press releases or documents were not published as well. Most importantly, since agendas and minutes of the sessions do not get publicly released at all, it is difficult to ascertain regularity and timeliness of publication of all adopted documents.

Compared to the baseline monitoring, there is no change in perceptions of the Government's practices, nor did the Government itself change the approach when it comes to publicity of its own deliberations. In other words, civil society still unfavourably perceives transparency of governmental decision-making processes, whereas the Government releases only limited or partial information on its meetings, with press releases being most regularly published and agendas and minutes fully hidden from the public eye.

92 For this element, timely means whether adopted documents are made publicly available via Government websites one week after the session at latest, for three months from the start of monitoring, i.e. for each government session within this period. In total, monitoring covered 43 government sessions held in the period 5 March - 5 June 2020.

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Graph 5: Indicator PDC_P6_I1: Transparency of the Government's decision-making



PRINCIPLE 10: THE POLICY-MAKING AND LEGAL-DRAFTING PROCESS IS EVIDENCE-BASED, AND IMPACT ASSESSMENT IS CONSISTENTLY USED ACROSS MINISTRIES

WeBER indicator PDC_P10_I1: Use of evidence created by think tanks, independent institutes and other CSOs in policy development

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Frequency of referencing of evidence-based findings produced by CSOs in the adopted government policy documents	4/4	4/4
E.2 Frequency of referencing of evidence-based findings produced by CSOs in policy papers and ex ante impact assessments	2/4	2/4
E.3 Share of evidence-based findings produced by wide range of CSOs referenced in ex post policy analyses and assessments of government institutions	2/2	0/2
E.4 Relevant ministries or other government institutions invite or commission wide range of CSOs, to prepare policy studies, papers or impact assessments for specific policy problems or proposals	0/2	1/2
E.5 Representatives of relevant ministries participate in policy dialogue pertaining to specific policy research products	1/2	0/2
E.6 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
E.7 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
E.8 Ministries accept CSOs' policy proposals in the work of working groups for developing policies and legislation	0/4	0/4
Total score	9/24	7/24
Indicator value (scale 0 – 5)⁹³	2	1

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

The analysis of frequency of referencing of evidence produced by CSOs in adopted policy documents shows that this is becoming a more regular practice.⁹⁴ In the three sample policy areas in which there is an active civil society (anti-discrimination, environment, and media and culture) majority of adopted policy documents use and quote civil society reports (11 out of 18 policy documents observed or 61%, see table 9). CSOs that took part in a focus group, however, claimed that even though the government does reference some of their findings, many of these are not truly used as input for the policy decisions and that “form outweighs the essence”, as their findings are referenced for the sake of referencing.⁹⁵

Table below provides an overview of external references in adopted policy documents that were implemented at the time of monitoring. It should be noted that due to multi-year character of policy documents, some of them were already analysed in the baseline PAR Monitor 2017/18, and these results are repeated (for documents 1-3, and 7-12). When previously analysed policy documents are excluded from the analysis, outcome of the frequency of referencing is only slightly higher - 67%.

Table 3: Frequency of referencing of evidence-based findings produced by CSOs in the adopted government policy documents

Policy area	Policy document	No. of references
Anti-discrimination	1. Strategy for Prevention and Protection against Discrimination	9
	2. National Strategy for Gender Equality 2016 to 2020	8
	3. Strategy for Social Inclusion of Roma in the Republic of Serbia 2016 to 2025	8
	4. Strategy for Improving the Position of People with Disabilities in the Republic of Serbia 2020-2024	14
	5. Strategy for the Prevention and Control of HIV Infections and AIDs in the Republic of Serbia 2018-2025	12
	6. Mental Health Program for the Republic of Serbia 2019-2026	0
Environment	7. Strategy for Water Management	0
	8. Strategy for Implementation of the Aarhus Convention	1
	9. National Strategy for a Sustainable Use of Natural Resources and Goods	0
	10. National Strategy for Approximation in the Area of the Environment for the Republic of Serbia	0
	11. Status and Plans of Transposition of and Implementation of the EU Acquis for Chapter 27	1
	12. National Programme of Environmental Protection	0
	13. National Plan to Reduce Major Pollutant Emissions from Old, Large Combustion Plants	0
	14. Strategy for Mineral Resources Management until 2030	1
	15. National Strategy for the Improvement of Animal Feed Facilities 2016-2021	0
	16. Program for the Improvement of the Management of Animal By-Products 2020 - 2024	4
Media and Culture	17. Strategy for the Development of Public Communication Systems in the Republic of Serbia 2020-2025	26
	18. Strategy for the Development of Culture from 2020 to 2029	3

When it comes to policy papers and impact assessments which do not go through formal adoption procedures, frequency of referencing of CSO findings in the same three policy areas is much lower, although some instances were identified.⁹⁶ Only 6 out of 99 analysed documents included such references, and most of them are those already analysed in the baseline monitoring cycle. Therefore, the problem is often the lack of regular production or update of such documents in the policymaking process, but the extent of use of CSO inputs even in those which are produced remains at quite a low level, similarly to the baseline PAR Monitor.

94 Policy documents observed include strategies, plans, programmes, or other types of documents that are formally adopted, implemented at the time of monitoring, and which can reference information directly.

95 Focus group with civil society organisations held on 15 October 2020.

96 Policy papers and impact assessment documents include ex ante regulatory impact assessments (RIAs), other types of ex ante impact assessments, policy concept documents, policy papers (green papers, white papers) as well as annotations/justifications of legislation and policy documents.

Finally, three quarters of the analysed ex-post analyses and assessments, in the sampled policy areas mentioned above, include references to reports and data from civil society or other research organisations or journals (3 out of 4, see table 10). This marks an improvement compared to the previous monitoring cycle, when almost no such assessments could be found on the ministries' websites or obtained through FOI requests.

Table 4: Frequency of referencing of evidence-based findings produced by CSOs in the ex-post analyses and assessments

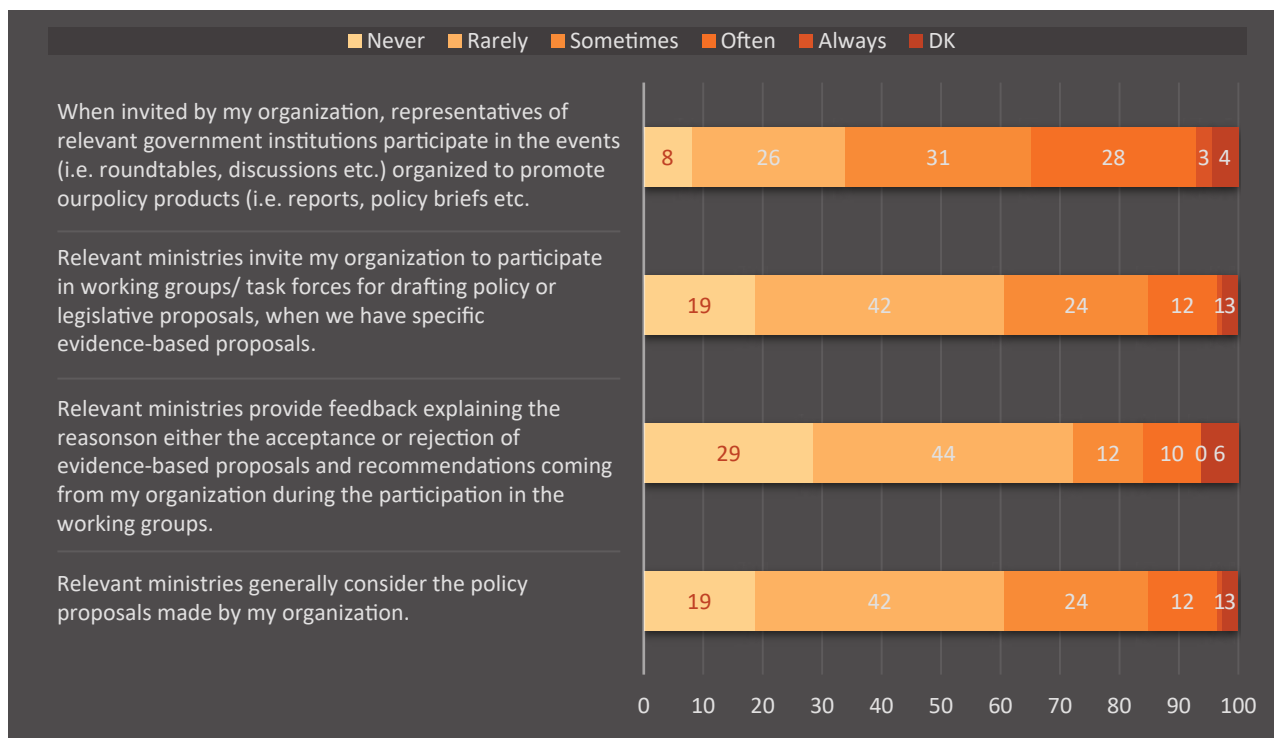
Ex-post analytical documents	No. of references
1. Sixth Report on the Action Plan for the Strategy for the Prevention and Protection against Discrimination for the Period of 2014 to 2018 - for the Third and Fourth Quarter of 2017	0
2. Final Report Evaluating the Action Plan for Implementing the National Strategy for Gender Equality in the Republic of Serbia	16
3. Law Application Analysis in the Field of Human and Minority Rights Protection 2018	25
4. Law Application Analysis in the Field of Human and Minority Rights Protection 2019	7

The remaining elements of this indicator look at CSO perceptions regarding the extent of use of their inputs in the governmental policymaking (chart 3). Almost a third of surveyed organisations report that government representatives always or often participate in their events organised to promote CSO policy products, when invited - marking an increase in 4 percentage points compared to the baseline PAR Monitor. A third, on the other hand, states that this is never or rarely the case. A much more negative experience emerges when CSOs are asked if they get invited to take part in working groups for drafting strategies or laws in their policy areas, where 61% respond that this is never or rarely the case. The same percentage states that ministries never or rarely consider their policy proposals in the work of working groups. In both cases, there is an increase in the share of negative responses compared to the previous PAR Monitor, for 6 and 5 percentage points, respectively. Finally, an even larger majority (73%) of respondents claim that they never or rarely receive reasoning behind either acceptance or rejection of their proposals when they contribute to such working groups (5 percentage points more than in the baseline monitoring).

For all these questions, a very low share of respondents – around 1 in 10 – reports a positive experience, i.e., that they always or often participate and contribute to working groups, receive feedback or generally manage to influence policy with their proposals. These positive views have generally dropped since the previous PAR Monitor, with the most marked decrease of almost 10 percentage points for the question relating to the frequency of involvement of CSOs in the working groups - from 22% in the previous cycle, to 12.5% in this edition. Considering that since the previous PAR Monitor the Government adopted guidelines for involving CSOs in the working groups for legislation and policy documents,⁹⁷ the relation between these findings and the adopted guidelines remains as a topic for further analysis.

⁹⁷ Conclusion on the adoption of Guidelines for the inclusion of civil society organisations in working groups for the development of proposals of policy documents and proposals of legal acts, Official Gazette No. 8/2020, available at: <https://bit.ly/3jGmir7> (last accessed on 6 June 2021).

Chart 3: CSO perception on the use of evidence created by think tanks, independent institutes and other CSOs in policy development (%)

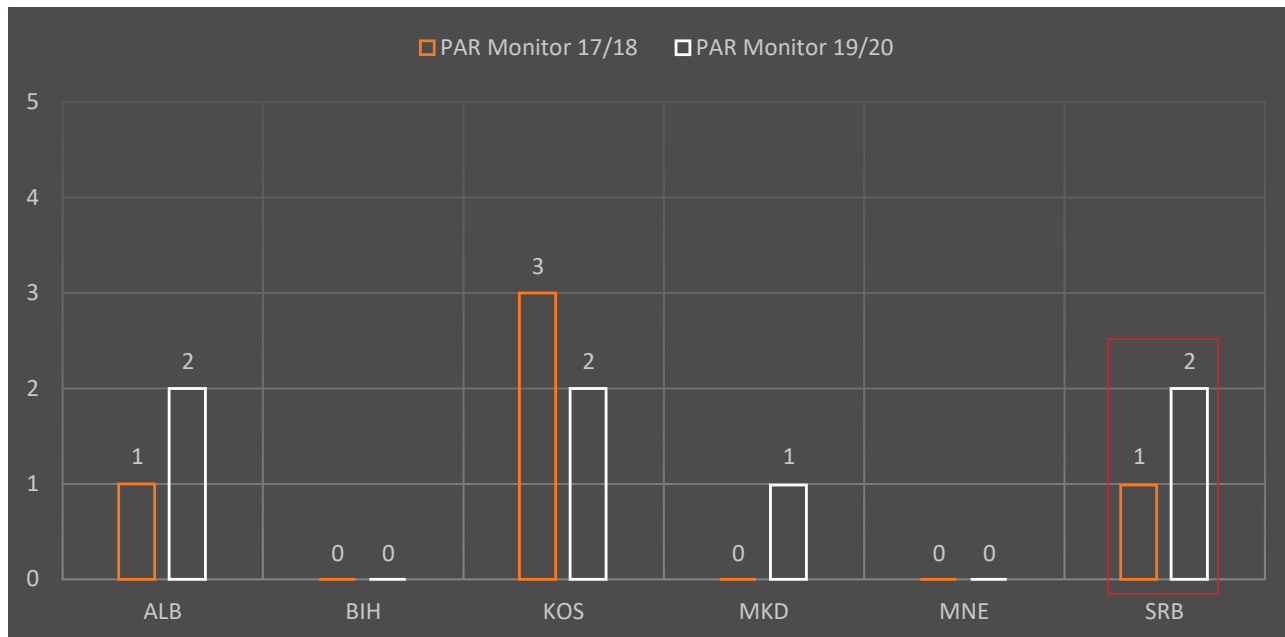


Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, N=122.

Compared to the PAR Monitor 2017/18, the most notable improvement concerns higher availability of ex post policy documents, and more references to externally produced research and data in such publications. Together with more positive CSO perception on how frequently government institutions accept their invitations to join policy discussions, this has affected indicator value for the better. On other issues, this monitoring cycle returned similar results to those found in the baseline report – there is a relatively high frequency of referencing CSOs’ work in official policy documents, much less so in policy papers and impact assessments, and surveyed CSOs believe they are insufficiently involved in governmental working groups for developing policy and legal proposals, and even when they are involved, impression is they rarely receive feedback or manage to influence policy.

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Graph 6: Indicator PDC_P10_I1: Use of evidence created by think tanks, independent institutes and other CSOs in policy development



PRINCIPLE 11: POLICIES AND LEGISLATION ARE DESIGNED IN AN INCLUSIVE MANNER THAT ENABLES THE ACTIVE PARTICIPATION OF SOCIETY

WeBER indicator PDC_P11_I1: Inclusiveness and openness of policymaking*

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Scope of public consultations on policy documents in central administration	2/4	n/a
E.2 Scope of public consultations on legislation in central administration	0/4	n/a
E.3 Availability of reporting on public consultations on policy documents by central administration	2/4	n/a
E.4 Availability of reporting on public consultations on legislation by central administration	2/4	n/a
E.5 Basic functionality of a national public consultation portal	0/4	n/a
E.6 Advanced functionality of a national public consultation portal	0/2	n/a
E.7 Proactiveness of informing on public consultations	0/4	n/a
E.8 Embeddedness of early public consultations in practice	0/2	n/a
E.9 Quality of reporting on public consultations	0/2	n/a
E.10 Impact of public consultation results on policy making	0/2	n/a
E.11 CSOs consider formal consultation procedures create preconditions for effective inclusion of the public in the policy-making process	0/2	0/4
E.12 CSOs consider formal consultation procedures are applied consistently	0/2	0/4
E.13 CSOs consider that they are consulted at the early phases of the policy process	0/2	0/4
E.14 CSOs consider consultees are timely provided with information on the content of legislative or policy proposals	0/2	0/2
E.15 CSOs consider consultees are provided with adequate information on the content of legislative or policy proposals	0/2	0/2
E.16 CSOs consider sponsoring ministries take actions to ensure that diversity of interests is represented in the consultation processes	0/2	0/2
E.17 CSOs consider ministries (sponsors of policy and legislative proposals) provide written feedback on consultees' inputs/comments	0/2	0/4
E.18 CSOs consider ministries accept consultees' inputs/comments	0/2	0/4
E.19 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
Total score	6/50	0/30
Indicator value (scale 0 – 5)⁹⁸	0	0

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

98 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.

The revised indicator on the inclusiveness of policymaking practices of the Government, although not comparable to the first monitoring cycle due to the added elements based on document and website analysis, still has not revealed positive or improved practices in this area. With ten new elements analysing evidence on the scope and quality of public consultation mechanisms, the indicator allows for a more balanced assessment than before. Yet, out of these ten new elements, only three have received partial points. When it comes to scope of public consultations and debates, out of 13 policy documents the Government adopted in the assessment period,⁹⁹ 7 went through some form of a public consultation (54%), which was sufficient to establish partial existence of the overall consultation practice for policy documents. Yet, in the case of legislation the share goes down to 35% for the same assessment period (32 out of 92 laws observed),¹⁰⁰ which was insufficient to allocate points.¹⁰¹

At the same time, there is insufficient proactiveness in publicising ongoing public consultations and public debates. Monitoring showed that for a single ongoing consultation at the time of monitoring, not all available channels for its publication were used to reach as wide segments of the public as possible.¹⁰² The eGovernment portal, which was in use for public consultations at the time of monitoring, was not employed consistently by institutions to publicise them.¹⁰³ CSOs participating in a focus group agreed there is little to no proactivity and effort when it comes to informing on public consultations and debates, and that the government institutions only use channels required by law but their reach is limited.¹⁰⁴ Early consultations have also not been embedded in the policymaking system, despite improvements in the legal framework,¹⁰⁵ as only one out of 39 laws and policy documents, which were consulted in the observed period, had an early consultation organised before a draft was finalised.

Furthermore, both in case of policy documents and laws, there is a partial practice of publishing reports on the conducted public consultations and public debates (in 71-72% of cases). The quality of those reports, 28 in total, tends to be unsatisfactory, as in most cases they do not list comments received during consultative process individually or elaborate on their acceptance or rejection along with due justifications. Some of these reporting elements are found in specific analysed reports, but there is a clear lack of a unified or even generally consistent approach in the production of consultation reports.

Impact of public consultations on the policymaking was measured by assessing the percentage of rejected proposals, but in most cases this percentage could not be calculated because of issues of the quality of reporting explained above. Yet, for those reports that were found to contain the necessary elements to allow such calculation, rejection rate was found to be 78% of all comments received, which would still result in zero points allocated for the actual impact of public consultations. CSO participants in the focus group pointed out that public consultations have indeed a very little impact - their proposals are barely considered and for many comments and suggestions they never get feedback.¹⁰⁶

Since a true national online consultation portal did not exist at the time of monitoring, the analysis of the subdomain of the eGovernment portal, dedicated to public consultations and debates, did not show satisfaction of either basic or advanced requirements for a fully functional consultation portal. Importantly, searchability of the subdomain was significantly limited as search option inconsistently displayed results on completed consultation processes. As a new online consultation portal was being launched at the time of the writing of this report, its functionality could not be assessed and will be tackled in the next PAR Monitor.

99 Public consultation practices are observed for all policy documents adopted in the second half of the year preceding the year of monitoring, i.e., period between July and December 2019 for this PAR Monitor.

100 Laws adopted in the period between July and December 2019.

101 The national legislation on consultation and public debate does not stipulate precisely what laws are exempt from consultations or public debates. Therefore, except for ratification acts, this sample includes all passed legislation in the studied period.

102 For all the ongoing consultations on policy documents and legislation in the period of measuring this indicator it was monitored whether following means for informing were used: 1. webpages of authorities holding consultations; 2. websites of relevant government offices (for example, for cooperation with civil society); 3. social media of the government institutions (of an individual CoG institution, or of individual institutions); 4. e-consultation portals; and 5. media.

103 Public consultations at the eGovernment portal, available at: <https://bit.ly/3hiqID> (last accessed on 7 June 2021).

104 Focus group with civil society organisations held on 15 October 2020.

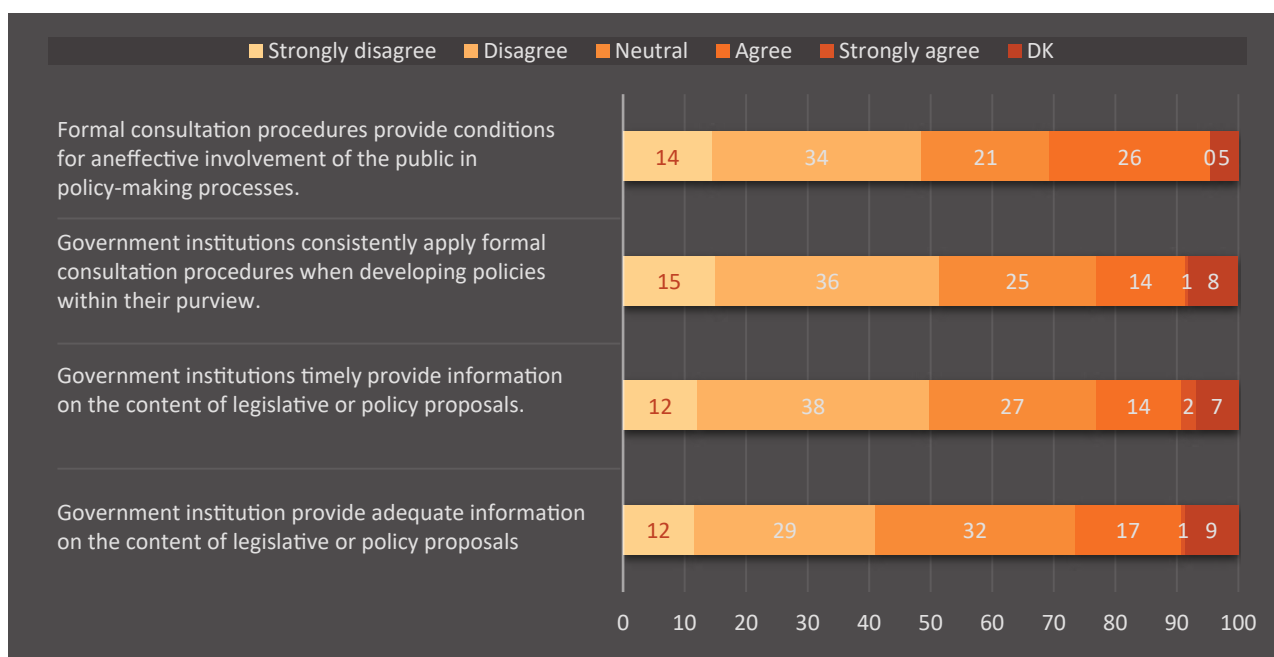
105 Article 77 of the Law on State Administration requires early consultations for legislation, whereas Article 34 of the Law on the Planning System requires it for policy documents.

106 Focus group with civil society organisations held on 15 October 2020.

The remaining elements of this indicator look at the perceptions and experiences of CSOs regarding inclusiveness and openness of policymaking. Once again, the results from the CSOs surveys between the two monitoring cycles are not directly comparable, since it was not possible to assure an identical sample, but one can follow trends over time. Surveyed CSOs still hold predominantly negative views on this matter, though they tend to be slightly less negative than in the baseline PAR Monitor. Whereas the share of CSOs that hold positive views is largely stable, the share of those disagreeing with the statements related to the quality and implementation of consultations has decreased overall, resulting in an increased number of organisations that are neutral on the matter. This trend might indicate that there is a hesitant recognition of the improvements in the rules and requirements governing consultation processes, although the practice might not be sufficient to cause an increase in the positive views.

Almost a half of respondent CSOs disagrees that formal consultation procedures provide conditions for effective involvement of the public in policymaking processes (48%), while a quarter agrees with this statement (chart Xa). A somewhat larger share of disagreement emerges on the question whether government institutions consistently apply consultation procedures when they develop policies (51%, as in the baseline monitoring), with a significantly lower share of agreement (15%, marking 8 percentage points drop compared to the previous monitoring). Perceptions are very similar with regards to whether institutions provide timely information on the content of legislative or policy proposals. When asked if institutions provide adequate information on the content of legislative or policy proposals, a somewhat smaller share of CSOs disagree (41%), although almost a third remains neutral on the matter.

Chart 4: Civil society perception of inclusiveness and openness of policy making (%)



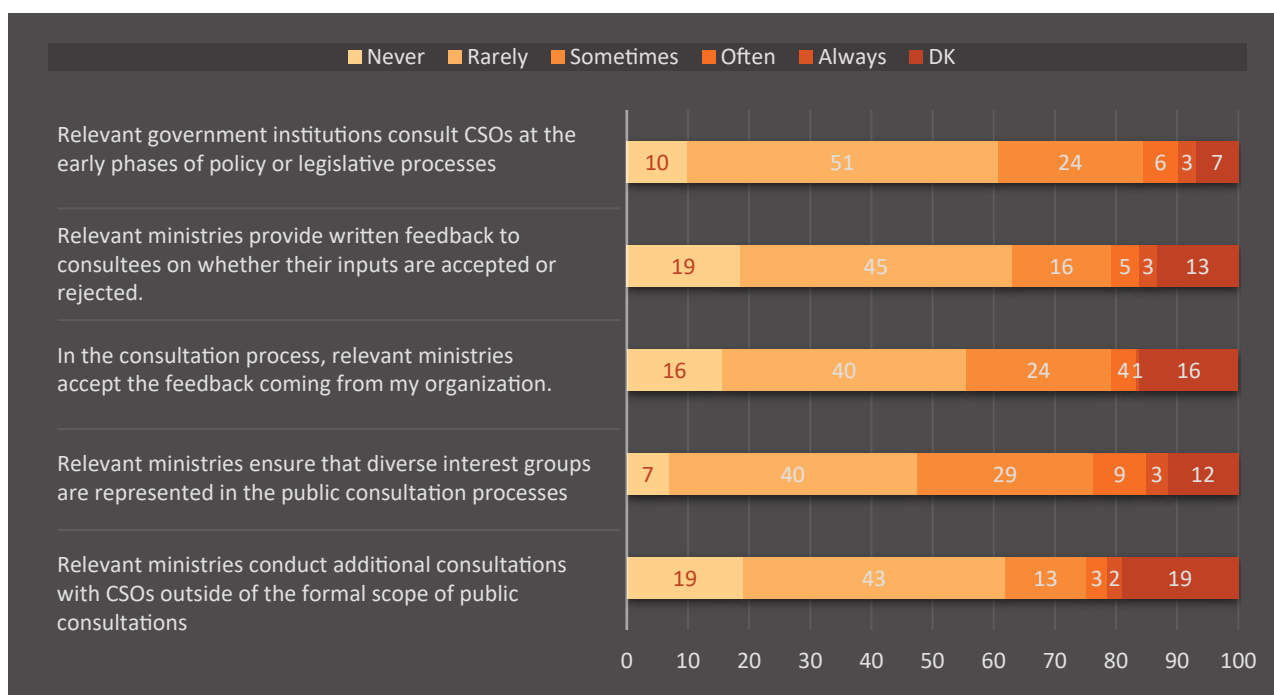
Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, N=173.

A second group of questions within this indicator examining frequency of specific consultation-related practices produces significantly more negative views by CSO respondents overall. Firstly, 6 in 10 respondents report that that relevant government institutions rarely or never consult CSOs in the early phases of policy or legislative processes, with almost a quarter saying that this happens “sometimes” which represents an increase of 7 percentage points on this neutral option when compared to the previous cycle. Similarly, and in line with the results of the baseline monitoring, almost two thirds (64%) deny that consultees are provided written feedback on whether their inputs are accepted or not. Over a half also state that ministries rarely or never accept the feedback their organisations provide in consultation processes (56%), again with a quarter

replying that this happens sometimes. Disapproval goes only slightly below half of respondents on the statement whether relevant ministries ensure representation of diverse interest groups,¹⁰⁷ although on this question the share of “sometimes” responses increases to 29% (as opposed 21% in the previous cycle). Finally, 6 in 10 also reply that additional consultations with CSOs are never or rarely organised outside of the scope of formal consultations, repeating perception results from the 2017/18 cycle.

This group of questions receives a higher share of “don’t know” responses overall as it goes into greater detail of how consultations are implemented (chart 6), requiring more experience by respondents in these procedures. As a result, the share of “always” and “often” responses on this set of questions varies from 5 to 12 percent, indicating that the civil society considers these practices as almost non-existent in the Serbian policymaking system.

Chart 5: Civil society perception of inclusiveness and openness of policy making (%)



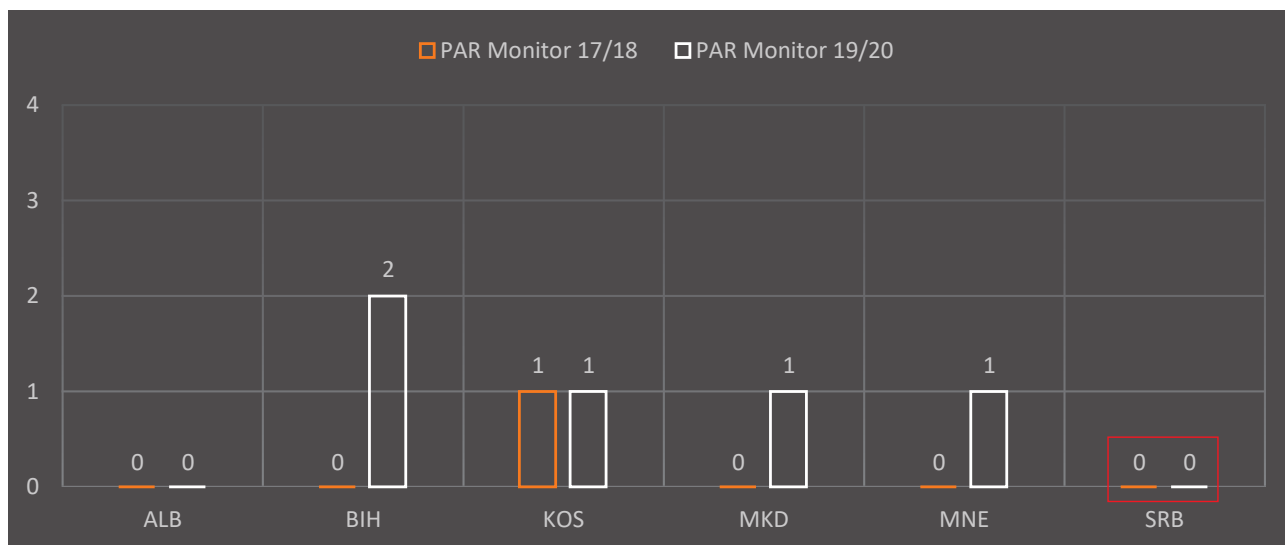
Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%, N=173.

Overall, no progress has been recorded in between the two monitoring cycles. Monitoring results of newly added indicator elements, that focus on the implementation of public consultations and public debates in practice, show that interested public is inconsistently consulted, consultation reports are irregularly published, and the actual impact of public involvement remains limited. In addition, authorities organising consultations do not engage in proactive informing or in early involvement of stakeholders. What is more, despite slightly less negative perception compared to the baseline monitoring, and an increase in number of those that are neutral, civil society representatives still hold firmly critical position on all observed aspects of quality and inclusiveness of public consultation practices.

¹⁰⁷ Such as women’s organisations, organisations representing people with disabilities, etc.

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Graph 7: Indicator PDC_P11_I1: Inclusiveness and openness of policymaking *



*It should be noted that the values for the two monitoring cycles are not directly comparable due to the change in the monitoring methodology.

III.5 SUMMARY RESULTS IN THE POLICY DEVELOPMENT AND COORDINATION AREA

Overall, the practices of the Government's publication of workplans and work reports have not marked tangible improvements since the baseline PAR Monitor. The Government still does not regularly disclose its annual reports to the public, and contents of these reports are not addressing Government's overall performance. As in the baseline PAR Monitor, the only consistent approach to presenting information about Government's activities is found in publishing of press releases. At the same time, civil society's highly negative views of the quality of the Government's planning and reporting did not alter since the 2017/18 monitoring cycle.

Following the same trend from the previous monitoring cycle, the transparency of decision-making at governmental sessions has remained quite opaque. Only press releases and majority of adopted acts are published after each session, whereas agendas and minutes from sessions do not get publicly released. Importantly, government conclusions – important acts for deciding on non-legislative issues – as a rule do not get published as well. Along these lines, surveyed CSOs perceive decision making processes of the Government as extremely non-transparent.

As in the baseline PAR Monitor, evidence produced by CSOs does get cited in adopted policy documents (such as strategies and programmes), whereas this is much less frequently the case for policy papers and impact assessments. Though there were fewer examined ex-post policy evaluations and analysis, since they are not yet well established in the policymaking system, a considerable share did reference CSO findings (3 of 4 such documents), which marks a noteworthy improvement compared to the previous monitoring cycle. Surveyed CSOs share largely negative views on the opportunities for their effective contribution with evidence in the development of policy documents through working groups. A slight exception is found in more positive views regarding the opportunities that CSOs have to present policy recommendations to policymakers at their events.

Finally, a revised indicator on inclusiveness of policymaking processes via public consultations and public debates, although striking a better balance between analysis of practices and CSOs' perceptions, still returns poor findings. The actual consultation practices lack consistency, as the numerous analysed cases do not confirm widespread quality of consultation procedures. While the scope of consultations on policy documents is on a solid level, for legislation it is much lower. Moreover, reporting on public consultations for both policy documents and legislation was registered in majority, but not in all cases when they were conducted (in around 70%). Yet, other elements important for the quality of consultative processes, such as proactiveness in informing the public, quality of the reporting on consultations, practicing consultations in early phases of the policy cycle, are largely missing. At the same time, proper online consultation platform was also not in place at the time of monitoring. Finally, survey results display, once again, civil society's highly negative view of how responsible authorities in Serbia implement public consultations and debates in practice.

III.6 RECOMMENDATIONS FOR POLICY DEVELOPMENT AND COORDINATION

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2018

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, easily visible and accessible from the homepage	Initiated	The official portal of the Serbian Government still fails to include reports on the work of the Government. These reports are only found at the website of the General Secretariat of the Government – a rarely updated and quite obsolete website – but their publication is not regular there either. ¹⁰⁸
2. GAWP annual reporting should include citizen-friendly descriptions of achievements by the Government as a whole	No action taken	The annual report on the government's work comprises only inputs of individual ministries and other administrative authorities. No steps have been made to improve the format and content of these reports. At the same time, the report (ex-post analysis) on the multi-annual Action Plan for the Implementation of Government Program (APIGP) was published and can serve as an example for reforming the GAWP reporting approach. ¹⁰⁹
3. GAWP annual reporting should be improved to include assessment of results achieved in different policy areas in the reporting period including relevant information on horizontal policy dimensions	No action taken	No steps have been made to improve the format and content of these reports.
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 an individual session, minutes should be published in a timely manner, a week after the session at latest.	Initiated	Agendas and minutes from government sessions are still not published. Yet, a new initiative led by the World Bank has gathered both state and civil society representatives with the objective of increasing government transparency and accountability and built commitment to improve transparency of government sessions, among other priority items.
5. Press releases should be published or linked together with other materials, so all the information from an individual session can be found and accessed at the single website location	No action taken	Press releases, although published for most government sessions, do not appear on the portal together with other materials published from the sessions. ¹¹⁰
6. The structure and appearance of information on sessions should be revamped for easier access. Although this information is available via the homepage banner, visibility should be improved and the download of documents in zipped format avoided	Partially implemented	Government sessions are listed for each government mandate and for each calendar year, with the number of session and the date of the session clearly provided, thus making search easier. Yet, documents are still published in zipped folders, requiring redundant clicks.

108 General Secretariat of the Government, available at: <http://www.gs.gov.rs/> (last accessed 7 June 2021).

109 Example of GAWP report available at website of the General Secretariat of the Government.

110 Materials from Government's sessions available at: <https://bit.ly/3hgFZUP> (last accessed on 7 June 2021).

<p>7. Ministries, and other public authorities organising public consultations (and public debates), should ensure timeliness and proactiveness in announcing them. That is, enough time should be dedicated for the preparations of civil society and other interested stakeholders, and all available channels should be used to announce consultations – including the websites of the responsible body, the eGovernment portal, the Office for Cooperation with Civil Society and the social media of all the involved institutions, at least. In cases of local policies, adequate local channels with wide reach should be applied as well.</p>	<p>Partially implemented</p>	<p>Ministries as a rule publish their consultation announcements on their websites. Some ministries also publish it on the dedicated page of the eGovernment portal, although it is noticeable that certain ministries simply fail to announce any of their consultations there. Analysis of consultation announcements for 2019-2021 shows that below 50% of all public consultations were announced at this portal. In the meantime, a new e-participation portal has been built and was in the process of launching at the time of the writing of this report.¹¹¹</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 organisations and individuals.</p>	<p>No action taken</p>	<p>Judging by their websites, none of the 21 ministries keeps comprehensive records of civil society organisations and individuals who have previously participated in public debates and consultations. Individual reports from public debates do not provide complete lists of participating civil society organisations either. At best, reports list civil society organisations that have submitted comments. Browsing through the website of the Ministry of Justice, one can find an isolated example of good practice: a list of civil society organisations invited to participate in the round table and list of representatives of civil society organisations who attended the round table on March 15, 2019.¹¹²</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>Partially implemented</p>	<p>With the entry into force of the Law on the Planning System, early consultations in the development of policy documents became an obligation. Moreover, the amendment of the Law on State Administration (Article 77) obliges administrative authorities to announce the start of the process of developing legislation and ensure public participation during the process of its development. Yet, no system has been put in place for quality assurance of these consultation processes, which is why these practices have not yet been consistently applied.¹¹³</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 the 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, as well as transparent and unambiguous.</p>	<p>Partially implemented</p>	<p>Please refer to the comment for the previous recommendation.</p>
<p>11. Additional consultation should be considered in each case when the consultation process returned unresolved, contested or especially important issues for civil society and the public, but also when no input was received in the first attempt. Such practice can increase trust in the process and, eventually, the quality of adopted solutions.</p>	<p>N/A</p>	<p>Implementation of this recommendation could not be verified based on the analysis of available documents and information.</p>
<p>12. The online database of legislation should be promoted through the governmental and individual administration bodies' websites, preferably through banners easily redirecting visitors. Although accessible and free of charge on the Official Gazette website, awareness of this database should be improved to reach as many of those interested in browsing it as possible.</p>	<p>No action taken</p>	<p>Some links do lead to specific sections of the online database of legislation (Pravno-informacioni sistem Republike Srbije). For instance, the Ministry of Justice has a link to the registry and texts of regulations section at a location that is more than three clicks from the homepage. Similarly, the website of the Government of Serbia provides a link to COVID-19 section of the online database. Nevertheless, it cannot be concluded that the Ministry of Justice or the Government promote the online database of legislation in the sense intended by this recommendation. In sum, the promotion, and the awareness of the online database of legislation remains inexistent.</p>
<p>13. In addition, all materials contained in the online database of the Official Gazette should be made publicly available without payment.</p>	<p>No action taken</p>	<p>Although the basic databases of legislation are available with no payment, the database of opinions, models and literature are available upon paid subscription only.</p>

111 Available at (portal still not in official use): <https://eparticipacija.gov.rs/> (last accessed on 7 June 2021).

112 Available at: <https://www.mpravde.gov.rs/sr/sekcija/53/radne-verzije-propisa.php> (last accessed on 7 June 2021).

113 Law on Planning System, available at: <https://bit.ly/3xmKBTB>, Law on State Administration, available at: <https://bit.ly/3AxCNf1>.

PAR MONITOR 2019/2020 RECOMMENDATIONS

Most of the recommendations from the 2017/2018 PAR Monitor are still highly relevant, as the Government has made little progress towards their implementation. Therefore, majority of recommendations - for the indicators still monitored - is repeated. The omitted recommendations are those relating to the excluded indicator pertaining to SIGMA Principle 12. Some of the recommendations which are repeated 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 2017/2018

1. GAWP annual implementation reports should be regularly published at the official Governments' website, or General Secretariats', 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. 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.

New recommendations 2019/2020

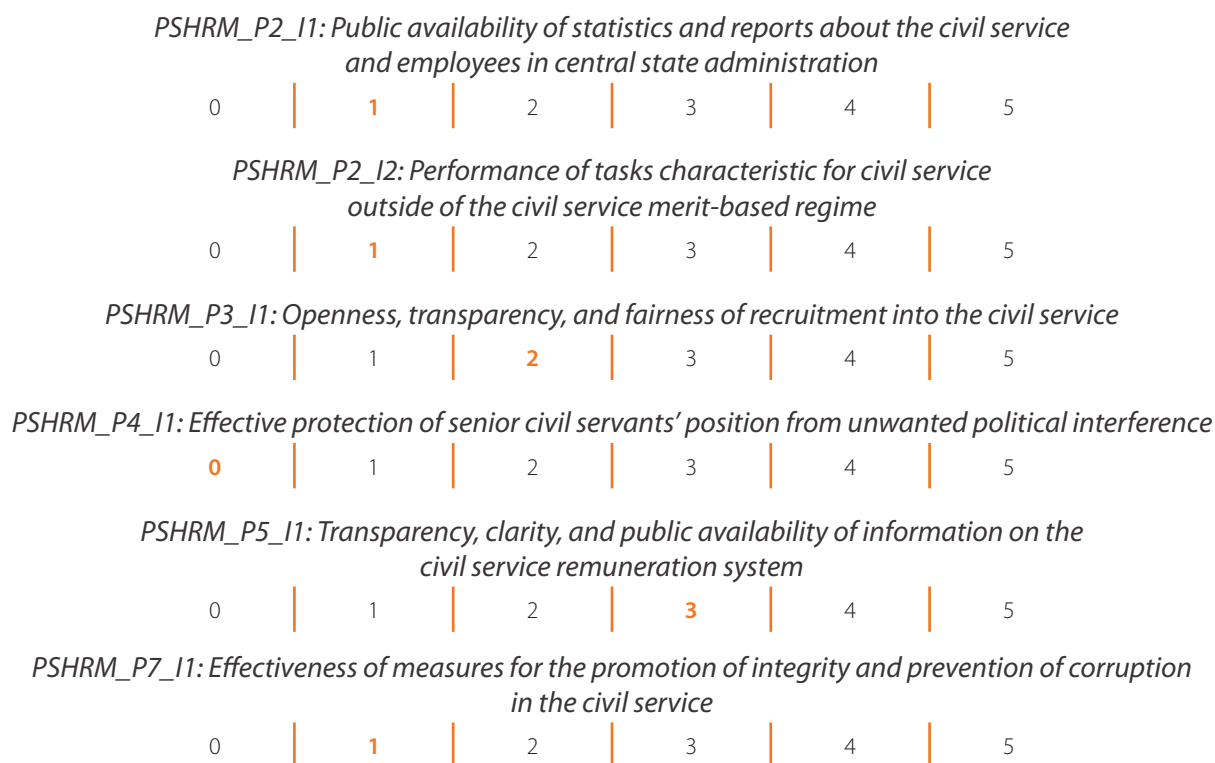
12. Introduce an obligation to publish the Government's conclusions as a particular type of act that the Government of Serbia uses to endorse numerous and diverse decisions, often with important fiscal, social, or environmental impact. Exceptions from the publication of these acts should strictly follow the regulations on the classification of data secrecy, meaning that they should only be exempt from publication if they are formally classified as confidential.¹¹⁴

¹¹⁴ This recommendation was meant to be part of the previous PAR Monitor as well, but it was left out by mistake in the publication process. CEP has advocated for its implementation nonetheless in the meantime.

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.
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.

IV PUBLIC SERVICE AND HUMAN RESOURCE ● MANAGEMENT

IV.1 WEBER INDICATORS USED IN PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT AND COUNTRY VALUES FOR SERBIA



IV.2 STATE OF PLAY IN PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT AND MAIN DEVELOPMENTS SINCE 2018

In the PSHRM area, major legal framework changes have taken place since the baseline PAR Monitor towards more aligned public service system, competency based HRM, merit-based employment, and improved professional development.

■ Civil service information system and data

Since December 2019, Human Resource Management Service of the Government (HRMS) has worked on the development of a new HRM information system together with other partner institutions. This new database was supposed to be operational in first half of 2021, and to allow analytical approach to staff and its planning.¹¹⁵ Amendments to the Law on Civil Servants (CSL) from 2018 stipulate that the central personnel registry is “information system for the support to human resource management.”¹¹⁶ The EC progress report from 2020, notes down delays in developing a new HRM information system, and highlights that the existing one does not interoperate with other important databases such as payroll registry.¹¹⁷

■ Temporary employment in civil service

With the CSL amendments in 2018 and 2020, temporary employment in civil service is additionally regulated. If temporary employment is based on temporary increase in the workload, recruitment is done after a public competition procedure, except if a person has already participated in public competition in the last four years

¹¹⁵ Public Administration Reform Strategy for the period 2021-2030, p. 123.

¹¹⁶ Art. 159, Law on Civil Servants, Official Gazette No. 79/2005-13, 81/2005-11 (corr.), 83/2005-21 (corr.), 64/2007-3, 67/2007-26 (corr.), 116/2008 76, 104/2009-27, 99/2014-7, 94/2017-5, 95/2018-366, 157/2020-3, available at: <https://bit.ly/3zeoxaj> (last accessed on 8 June 2021).

¹¹⁷ European Commission, Serbia 2020 Report, p.16.

and if all selection benchmarks were met.¹¹⁸ A person temporary employed for the reasons of temporary increase in workload can become full-time employee on the same job position if job duties were performed for at least six months, assessed positively and if job position is vacant.¹¹⁹ For temporary employments on other basis, except for trainees, there is no mandatory public competition.

According to the PAR Strategy 2021-2030, share of temporary employees in state administration bodies was 10% in December 2019, and 12% in September 2020, while other forms of temporary engagement participated with 12% in total employment which is assessed as unsatisfactory.¹²⁰ Also, although number of fulltime employees in public sector, financed from the state budget, was reduced for 37367 as of December 2019, it is said this was replaced by temporary or other forms of contractual engagements.¹²¹ The EC opines in its 2020 report on Serbia, that there is still a concern over temporary contracts' potential conversion to permanent civil service positions and that it needs close consideration.¹²²

■ Civil service employment and meritocracy

One of the major CSL amendments is the introduction of competencies in all HRM functions, including merit-based recruitment. According to the CSL, competencies are behavioural and functional (general and special),¹²³ and competency framework is regulated in detail through the bylaw.¹²⁴ The initial analysis on the application of competency framework showed that 91% of state administration bodies adjusted systematisation acts with this framework.¹²⁵

Among novelties towards merit-based recruitment, CSL amendments from 2018 introduced anonymity of competition by assigning a code to each applicant, single application form for all state bodies, reduction of required documentation, mandatory selection of best candidate, and public announcement of list of candidates who met selection criteria at the HRMS website.¹²⁶ PAR Strategy 2021-2030 reports that average number of candidates is still higher for public than internal competitions – 8 candidates per vacancy for the former, and 2 for the latter.¹²⁷ It also highlights that retention of quality staff is a challenge.¹²⁸ CSL introduced the responsibilities of HRMS to monitor staff outflow, analyse its impact on state administration bodies, and propose staff retention measures.¹²⁹

According to the EC, effectiveness of the introduced competency framework for HRM in civil service, introduced by the amended CSL in 2018, still needs confirmation in practice, and the HRMS needs capacity strengthening, to be able to coordinate HRM units in institutions.¹³⁰

■ Senior civil service professionalism

PAR Strategy 2021-2030 acknowledged that depoliticization of senior civil service positions is one of the pressing priorities in the EU accession process and that there is a need for "broad dialogue on the current state of affairs, as well as on roles and expectation from senior civil servants, their qualification and responsibilities."¹³¹ The CSL

118 This provision was envisaged to be implemented as of January 2021, however the Law has been amended in December 2020 and it will be in force as of 2023.

119 Art. 63-63a, Law on Civil Servants.

120 Public Administration Reform Strategy for the period 2021-2030, p. 115.

121 Ibid, p. 108.

122 European Commission, Serbia 2020 Report, p.16.

123 Art. 44a-v, Law on Civil Servants.

124 Regulation on Determining Competencies for Work of Civil Servants, Official Gazette no. 4/2019, available at: <https://bit.ly/2Tbr1pC> (last accessed on 8 June 2021). Other bylaws were adopted or amended as well for the purpose alignment with the introduction of competency framework, on internal and public competition, on work appraisal of civil servants, on internal organisation and job systematisation in ministries, special organisations, and government services, and on job position classifications and criteria for job descriptions of civil servants.

125 Public Administration Reform Strategy for the period 2021-2030, p. 104-105.

126 Ibid, p. 112.

127 Ibid, p. 18.

128 Ibid, p. 19.

129 Art. 158, Law on Civil Servants.

130 European Commission, Serbia 2020 Report, p.16.

131 Public Administration Reform Strategy for the period 2021-2030, p. 20.

amendments from 2018 tackled the issue of inflating, unlawful appointments or acting senior civil servants. Unlike before amendments, new solution stipulated that only fulltime civil servants can be appointed to an acting position without previous competition for a period of six months, plus additional three months if public competition was annulled. PAR Strategy informs that, by September 2020, 142 persons were appointed after competition, and 183 were in acting status out of 382 systematised senior management positions.¹³²

In its latest report, the EC observes the issue of acting positions within the senior civil service as the most critical problem and devotes much attention to it.¹³³ It points out continuous misuse of legally allowed period for appointments to acting positions, assessing that it leads to not only breach of legal limits but also to institutional memory loss and high staff turnover. Notwithstanding the legal amendments that have restricted these appointments, EC reports that persons outside civil service regime are still in acting status. In that respect, phasing out of all incumbent acting positions is assessed as a matter of urgency and political will. Finally, the EC recognises the lack of transparency in appointment decisions to senior civil service positions even after the competition process is finalised, due to discretionary decision-making by the Government's personnel committee.

■ Remuneration system and integrity of civil service

As regards with the remuneration and fair pay to civil servants, salary system reform has been delayed multiple times already. The EC report from 2020 informs on no progress in the application of the Law on Salary System in Public Sector as its implementation was once again postponed to 2021.¹³⁴ In December 2020, this Law was amended with date of application being moved to 1 January 2022.

When it comes to civil service integrity, Code of Conduct for Civil Servants regulates rules of ethics and conduct, integrity standards and provides guidance for informing the public on expected conduct from civil servants.¹³⁵ The Code was amended in 2020 with provisions on conduct in crisis and emergency states, whereas 2019 amendments have additionally elaborated on political neutrality of civil servants. In addition to the umbrella Code of Conduct for Civil Servants, the Customs Administration, the Tax Administration, and the Ministry of Interior adopted their own rules of conducts and behaviour.

Finally, despite the additional regulation of disciplinary procedure through the CSL amendments, with a focus on practical deficiencies, public administration bodies inadequately manage corruption and anti-discrimination risks, and recommendations of independent bodies are insufficiently applied.¹³⁶ Finally, the EC's assessment is that previously mentioned misuse of acting statuses of senior civil servant positions has additional adverse effect on integrity of the civil service.¹³⁷

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 central government civil service, 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.

132 Ibid, 116-117.

133 European Commission, Serbia 2020 Report, p.16-17.

134 European Commission, Serbia 2020 Report, p.16-17.

135 Code of Conduct of Civil Servants, Official Gazette no. 29/08, 30/15, 20/18, 42/18, 80/19, 32/20), available at: <https://bit.ly/3v2Z0CD> (last accessed on 8 June 2021).

136 Public Administration Reform Strategy for the period 2021-2030, p. 29.

137 European Commission, Serbia 2020 Report, p. 17.

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.

Monitoring of these principles combines the findings of SIGMA's assessment within specific sub-indicators. However, **having in mind that there is no SIGMA assessment for 2020, WeBER researchers performed their own calculation of SIGMA sub-indicators in this PAR Monitor cycle, based on SIGMA's methodology. SIGMA/OECD cannot be held responsible for the result of such calculation, but only the authors of this report.**

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.

Surveys of civil servants and CSOs in the six Western Balkan administrations were implemented using an online survey tool, between the second half of June and the beginning of August 2020.¹³⁸ 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.¹³⁹ 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.¹⁴⁰ To ensure that the CSO survey targeted as many organisations as possible in terms of their type, geographical distribution, and activity areas, and hence 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, during the period of 5 May - 30 May 2020.¹⁴¹ 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

¹³⁸ Surveys were administered through an anonymous, online questionnaire. The data collection method included CASI (computer-assisted self-interviewing). In Serbia, the civil servants' survey was conducted from 16 June to 17 July 2020, and the CSO survey in the period from 23 June to 24 July 2020.

¹³⁹ For Serbia, the survey sample was N=1513. The base for questions within Principle 2 was n=1405 respondents, Principle 3 had n=1513 respondents, Principle 5 had n=1296 respondents and Principle 7 had n=1268 respondents.

¹⁴⁰ For Serbia, the survey sample was N=184. The base for questions within PSHRM area was n= 154 respondents.

¹⁴¹ 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 during 5 May - 30 May 2020. For Serbia, the margin of error for the total sample of 1005 citizens is $\pm 3.15\%$, at the 95% confidence level.

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

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 The Government keeps reliable data pertaining to the public service	0/4	0/4
E.2 The Government regularly publishes basic official data pertaining to the public service	0/4	0/4
E.3 Published official data includes data on employees other than full-time civil servants in the central state administration	0/4	0/4
E.4 Published official data on public service is segregated based on gender and ethnic structure	0/2	0/2
E.5 Published official data is available in open data format(s)	0/1	0/1
E.6 The government comprehensively reports on the public service policy	2/4	2/4
E.7 The government regularly reports on the public service policy	1/2	1/2
E.8 Reports on the public service include substantiated information concerning the quality and/or outcomes of the public service work	1/2	1/2
E.9 Data and information about the public service are actively promoted to the public	2/2	0/2
Total score	6/25	4/25
Indicator value (scale 0 – 5)¹⁴²	1	0

The first element of this indicator was calculated by WeBER researchers based on SIGMA methodology. As in the baseline PAR Monitor, findings indicate that Serbian Government still does not keep reliable data on its civil service and that the current HRM database is not interoperable with other relevant systems (such as the payroll registry). Moreover, the data is not updated in real time in the existing database as state administration bodies either do not have enough capacities to ensure regular updates or do not see benefits for keeping track of this data in the current system that is outdated, not optimised, and time-consuming.¹⁴³ Largely for these reasons, database does not comprehensively cover all institutions and civil servants, although it does contain all information categories prescribed by the legislation. Finally, lacking optimisation, the database

¹⁴² 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

¹⁴³ Interview with a HRMS representative, held on 22 October 2020.

does not allow for quick reporting on relevant HRM areas too, such as the annual turnover of staff, which is one of the reasons why the HRMS requested resources for the establishment of a new database system. A new, central HRM information system (HRMIS) was being developed at the time of writing this report and is expected to be interoperable.

Together with an absence of a comprehensive and up-to-date database, the Government is also not found to publish basic data pertaining to the civil service, for instance, on number of civil servants per institution, rank, employment type, gender and similar. At the time of monitoring, the latest Report on Compliance with the Code of Conduct for Civil Servants for 2019 informed on how many civil servants worked across different types of government bodies (archived webpage of the HRMS contained these reports for previous years). This report, however, did not contain figures broken down by basic ranks/function, nor by institution, and not all institutions who are required to do so provide data for the purposes of reporting on code of conduct implementation.¹⁴⁴

In general, reporting on civil service policy remains moderate as in the baseline PAR Monitor. Out of seven key issues observed – 1) planning and recruitments, 2) performance appraisals, 3) career development, 4) trainings, 5) salaries, 6) disciplinary procedures, and 7) integrity measures - findings show that there are separate reports available on the implemented annual training programmes for civil servants (key issue 4) and the annual reports of the High Civil Service Council on the compliance of state administration bodies with the Code of Conduct (covering key issues 6 and 7). The HRMS produces reports on performance appraisals of civil servants, and their career development (the latter through the annual work report of the institution),¹⁴⁵ but these are not publicly available.

When it comes to regularity of reporting, it is similarly assessed as partial given that only reports for 2019, and one for 2018, were released on the new websites of the HRMS and the National Academy for Public Administration (NAPA) where an interested party could reasonably expect to find such information. These include report on compliance with the Code of Conduct for Civil Servants for 2019, and reports on evaluations of trainings for civil servants for 2018 and 2019.¹⁴⁶ These reports include general statements on the quality and outcomes on trainings and code of conduct implementation but are not substantiated with data or findings from other sources. Reports for other years observed (2018 and 2017) were mostly uploaded on the archived HRMS website at the time of monitoring.

Lastly, positive developments compared to the PAR Monitor 2017/18 pertain to more proactiveness in the promotion of data that was already publicly available in the observed year (2019). The efforts of NAPA are noteworthy as it made use of its social media and website, but also online media outlets to promote statistics on trainings for civil servants. On the other hand, MPALGS had only two social media posts with such content. Despite the maximum score of this indicator element, since data on civil service is promoted through more than two channels, it cannot be left unnoticed it is published for a single topic only – trainings, i.e., professional development of civil servants. Nevertheless, both NAPA and HRMS have started using their YouTube channels for promoting activities and new HRM procedures and it remains to be seen whether these will be used subsequently used for additional civil service data promotion.

Overall, progress recorded in this monitoring cycle is owed to the fact that responsible institutions engaged in public promotion of certain data from available reports on civil service, previously non-existent during the baseline monitoring, resulting in the indicator value of 1. When it comes to other aspects of public availability of information, the assessment did not change in between the two monitoring cycles – governmental HRM database is still not fully reliable, and observed data contained therein is not publicly disclosed, while reporting to the public on civil service is moderately comprehensive (for 3 out of 7 key issues), and it does not provide fully substantiated information on the outcomes in reported areas.

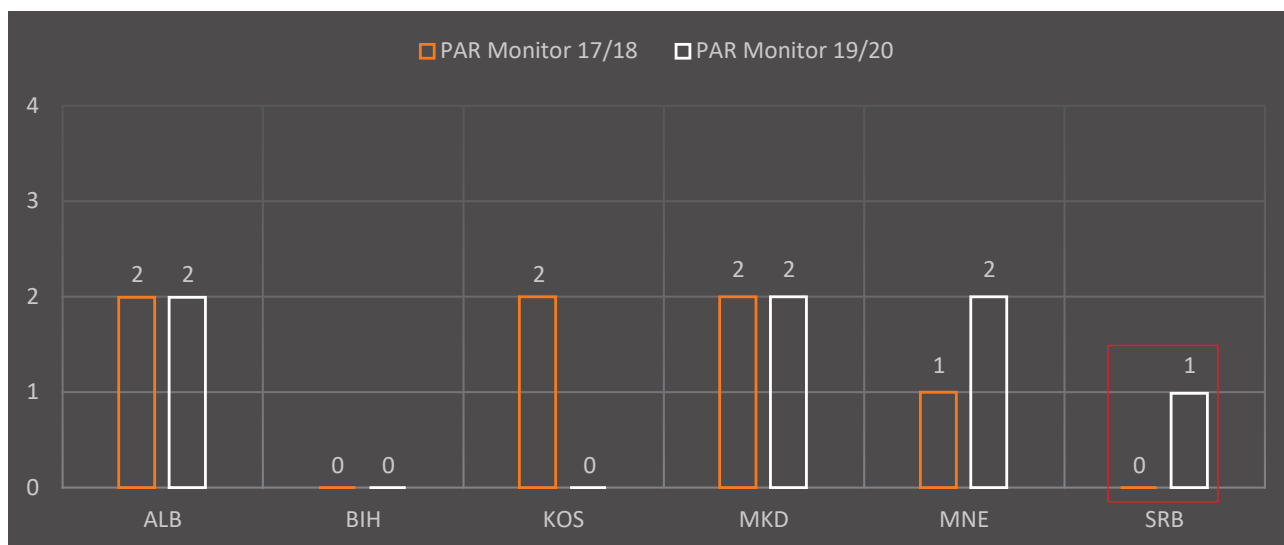
144 At the time of writing this PAR Monitor, Report on Compliance with the Code of Conduct for Civil Servants for 2020 was available at the HRMS website, available at: <https://tinyurl.com/ybj7fa2x> (last accessed on 9 June 2021).

145 Response to a FOI request, received on 14 July 2020.

146 Currently reports for 2020 are available at: <https://bit.ly/3iv5iDp>, and: <https://www.napa.gov.rs/tekst/487/izvestaji-i-evaluacije.php> (last accessed on 9 June 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 8: Indicator PSHRM_P2_I1: Public availability of statistics and reports about the civil service and employees in central state administration



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

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 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
E.2 There are specific criteria determined for the selection of individuals for temporary engagements in the state administration.	0/4	0/4
E.3 The hiring procedure for individuals engaged on temporary contracts is open and transparent	0/4	0/4
E.4 Duration of temporary engagement contracts is limited	0/4	0/4
E.5 Civil servants perceive that temporary engagements in the administration are an exception	0/2	0/2
E.6 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
E.7 Civil servants perceive that appointments on a temporary basis in the administration are merit-based	1/2	1/2
E.8 Civil servants perceive that the formal rules for appointments on a temporary basis are applied in practice	1/2	1/2
E.9 Civil servants perceive that individuals hired on a temporary basis go on to become civil servants after their contracts end	0/2	0/2
E.10 Civil servants perceive that contracts for temporary engagements are extended to more than one year	0/2	0/2
Total score	6/28	6/28
Indicator value (scale 0 – 5)¹⁴⁷	1	1

¹⁴⁷ 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

Results of this indicator show on major difference compared to the PAR Monitor 2017/18 and speak of mostly non-transparent procedures for temporary employment, and mostly unfavourable perception of civil servants on specific aspects of work that is performed on temporary basis within civil service. That said, the only fully positive assessment pertains to the limitation by law of the number of temporary engagements. The Budget System Law (BSL) stipulates that the total number of temporary employees hired due to increased workloads, or based on service contracts, contracts on temporary jobs or other grounds is limited to 10% of the total number of employees of budget beneficiaries.¹⁴⁸ This positive assessment remained the same as in the baseline PAR Monitor.

Issues arise, however, in terms of further regulation of temporary employment procedures. Namely, no regulation is found to specify detailed criteria for all types of temporary engagements. Moreover, recruitment procedures for temporary staff lack openness and transparency, particularly in terms of advertising competitions for temporary contracts. It is yet to be seen whether this practice will change once the obligation to conduct a public competition for temporary employment on the grounds of increase in the workload, introduced with the recent amendments to the CSL, comes into force. Finally, although the limit to the duration of temporary engagements may be found in legislation – in the CSL for the fixed-term employments, and in the Labour Law for contracts on temporary jobs – those limitations are not fully precise in each temporary engagement case.¹⁴⁹

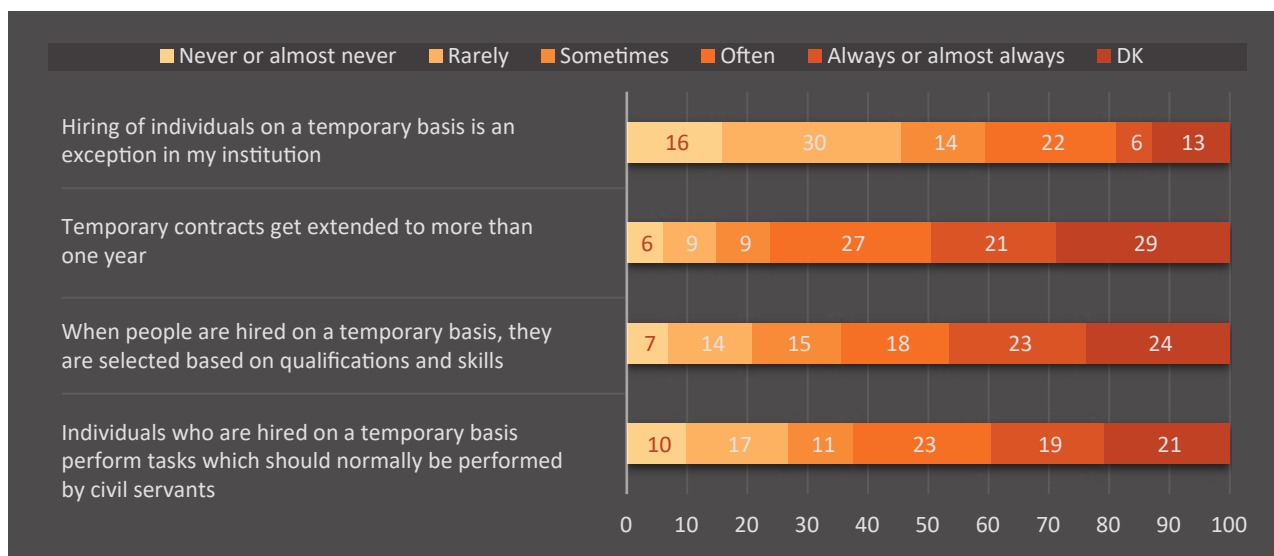
Results of perception survey of civil servants remain mostly in line with the baseline survey, with slightly more favourable attitude on specific issues. Under 30% of civil servants believe that temporary engagements in the state administration are an exception and that performance of civil service tasks by individuals hired on a temporary basis is an exception. Moreover, replicating the perception from the baseline PAR Monitor, only around 20% of civil servants report that individuals hired on a temporary basis rarely or never go on to become civil servants after their contracts end. Somewhat better results are found in the extent to which civil servants perceive formal rules for appointments on a temporary basis are applied in practice - roughly 40%, though with only minor increase compared to the baseline monitoring.

Similarly, around 40% of surveyed civil servants say that appointments on a temporary basis in the administration are merit-based (“often” or “always”), which represents an increase of roughly 6 percentage points since the baseline PAR Monitor. Slightly fewer civil servants than in the 2017/18 cycle believe that temporary contracts get extended to more than one year, but such perception is still shared by nearly half of respondents (see Chart 6), with share of those believing this happens never or rarely staying fairly low (15%). Finally, it is worth noting that still around a quarter reports that individuals who are hired on a temporary basis never or rarely perform tasks which should normally be performed by civil servants – from 22% in the baseline PAR Monitor, to 27% in this cycle.

148 Art. 27e of the 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 - corr., 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.

149 For example, “For the purpose of replacing an absent civil servant - until their return”. Article 63, of the CSL.

Chart 6. Perception of temporary hiring practices by civil servants (%)

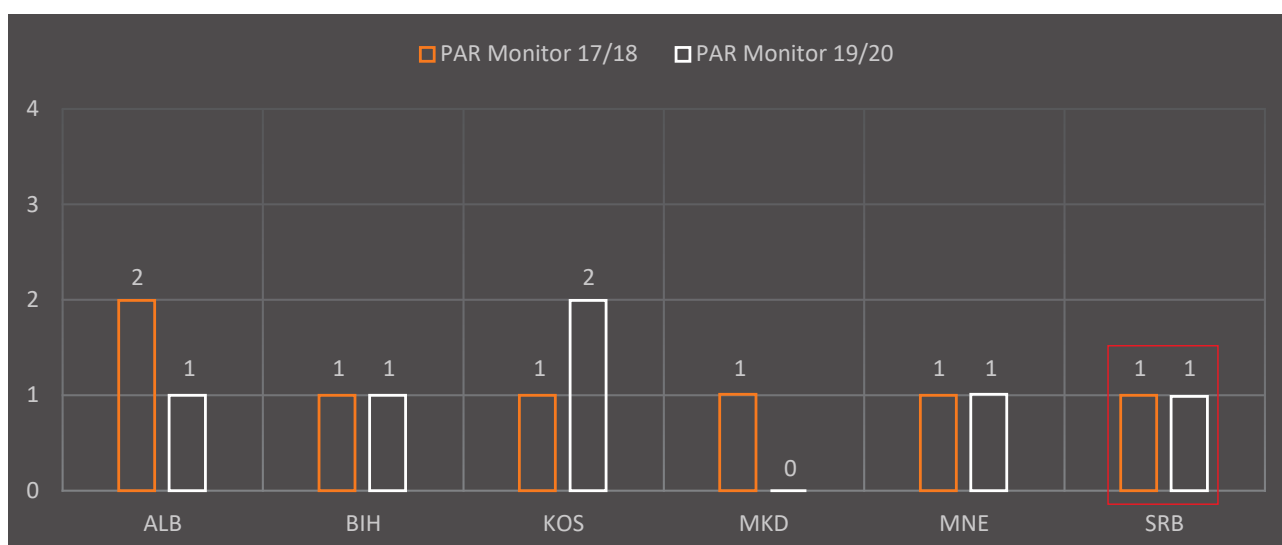


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1405.

No major developments have been recorded since the baseline monitoring, and the final assessment mirrors the one from the PAR Monitor 2017/18. Though the perception of civil servants has become comparatively a bit more positive on practices of managing temporary engagements and employment in the state administration, this has not affected the overall value of this indicator. Lack of openness and transparency of temporary engagements, specific criteria for selecting persons for temporary jobs, but also absence of fully defined duration limits for such contracts, remain issues yet to be tackled.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 9: Indicator PSHRM_P2_I2: Performance of tasks characteristic for civil service outside of the civil service merit-based regime central state administration



Regional PAR Monitor reports with results for all WB administrations are 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

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Information about public competitions is made broadly publicly available	2/4	4/4
E.2 Public competition announcements are written in a simple, clear, and understandable language	0/4	0/4
E.3 During the public competition procedure, interested candidates can request and obtain clarifications, which are made publicly available	2/4	2/4
E.4 There are no unreasonable barriers for external candidates which make public competitions more easily accessible to internal candidates	0/2	0/2
E.5 The application procedure imposes minimum administrative and paperwork burden on candidates	4/4	0/4
E.6 Candidates are allowed and invited to supplement missing documentation within a reasonable timeframe	0/4	0/4
E.7 Decisions and reasoning of the selection panels are made publicly available, with due respect to the protection of personal information	2/4	0/4
E.8 Information about annulled announcements is made publicly available, with reasoning provided	0/4	0/4
E.9 Civil servants perceive the recruitments into the civil service as based on merit	1/2	0/2
E.10 Civil servants perceive the recruitment procedure to ensure equal opportunity	2/2	1/2
E.11 The public perceives the recruitments done through the public competition process as based on merit	1/2	0/2
Total score	14/36	7/36
Indicator value (scale 0 – 5)¹⁵⁰	2	1

The level of openness, transparency, and fairness of recruitment into the civil service is still limited, but there has been progress since the 2017/2018 monitoring cycle. Above all, positive results are noted in the reduction of administrative and paperwork burden during application processes, and civil servants' perception has shifted towards more positive stance.

Owing to the CSL amendments in 2018, documentation submission in the competition procedure is now divided in two phases, whereby the first phase requires filling of application form only. The form includes basic information on candidates such as personal data, information on education, passed exams, digital literacy, foreign language proficiency, or work experience. Furthermore, if applicants can already prove they possess any of the competences required for the vacancy, they can submit written proofs. Those who pass the testing and get to the interview stage are requested - within 5 days from being notified they made it to an interview - to provide all the other written proofs of skills and competences they referred to in the application form. Although competition announcements reveal that documents need to be either originals or their certified copies, which could be costly for applicants, dividing documentation submission into two phases means that, unlike in the baseline PAR Monitor, candidates are no longer required to collect and submit all documentation upfront. Making the application procedures easier on candidates is especially relevant considering limited, oftentimes 8 days only, timeframe for applications that existed previously.

¹⁵⁰ 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

As in the baseline monitoring, data contained in the official records of the administration such as citizenship or birth certificates is collected, as noted in the baseline PAR Monitor, by recruiting authorities, unless candidates wish to collect and submit it themselves. The same applies for submission of evidence of previous work experience in case candidates used to work in the administration. Thus, overall findings of the application process suggest improvement in terms of minimising the administrative and paperwork burden for candidates.

Nevertheless, it is assessed that information about public competitions have been less publicly advertised than in the 2017/18 cycle. Five sampled authorities mostly used two nation-wide sources for advertising competitions (table x). It is worth noting that the Office for the Coordination of Affairs in the Process of Negotiation with the Provisional Institutions of Self-Government in Pristina (Office for Coordination) and the Ministry of Culture and Media stated they published announcements on their webpages this could not be confirmed by reviewing their websites at the time of monitoring in August 2020. Importantly, no sample announcements analysed were found on the eGovernment Portal despite the legal requirement of announcing public competitions there,¹⁵¹ and social media remain underutilised for publishing vacancies by individual institutions.

Table 5. Review of channels used for announcing public competitions for civil servants

	Own website	HRMS website	eGovernment portal	National Employment Agency
Office for Coordination	X	✓	X	✓
Ministry of Culture and Media	X	✓	X	✓
Ministry of Construction, Infrastructure and Transport	✓	✓	X	✓
Ministry of Labour, Employment, Veteran and Social Affairs	✓	✓	X	✓
Public Policy Secretariat	✓	✓	X	✓

From July 2020, the HRMS of the Government started proactively disseminating through a Viber group selected information to the public, including on announced competitions, short videos on competences and other posts. There is also an open-door day for questions (Thursdays) when all of 1285 members of this group may ask questions.¹⁵² While this is step forward in terms of external communication, it remains to be assessed in future PAR Monitor editions whether these and similar practices will lead to greater public promotion of vacancies.

Furthermore, interested candidates can request and obtain clarifications during the public competition procedure, but these clarifications are not made publicly available online and there is no legal obligation for publishing such clarifications. Certain developments exist though beyond the scope of this monitoring - the HRMS has introduced a *candidates' corner* section on its website, where candidates are supposed to get informed about all aspect of the application procedure and competence testing. In addition, the Viber community of the HRMS provides all members with the possibility to ask any question at a designated time. However, this practice was not considered for point allocation, as it was outside of the monitoring timeframe and formally it did not represent part of public competition process.

Another novelty introduced by the amendments to the CSL in late 2018 relates to the legal obligation for administration bodies to publish lists of candidates under their code numbers, and a name of the selected candidate. Analysis of the sample of five public competitions, from five administration bodies indicated in the table x above, revealed that the lists of candidates, and names of the selected ones, are mostly accessible on institutions' websites which is an improvement compared to the baseline monitoring (in 3 out of 5 cases, for the remaining two they were acquired through FOI request). Still, there is no obligation to publish reasoning

151 Article 54 of the CSL prescribes that the administrative body advertising public competition is supposed to advertise it on (1) its website, (2) on the website of the Human Resources Management Service, on the (3) eGovernment Portal, (4) on the bulletin board, website, and periodical magazine of the National Employment Agency. Interview with the HRMS, held on 22 October 2020.

152 State on 9 June 2021.

behind decisions of selection committees and these are not publicly released in practice as well. In practice, only heads of institutions announcing vacancies and applicants receive reasonings behind decision of selection committees.¹⁵³ Former applicants in competitions for civil service confirmed they were provided with a letter explaining the outcome of the selection process.¹⁵⁴

Aspects where no positive efforts since the baseline PAR Monitor were noted include texts of competition announcements – they remain generally extensive and formally written, with cases of job descriptions being directly copied from the rulebooks. Sample announcements analysed contain around 2000 words for a single job on average and coupled with the bureaucratic language and no visual presentation of application steps they do not make applications easier for potential candidates. Also, the closing date for applications is not specified in simple and precise manner, and all public competition announcements state that the timeframe for applications cannot be shorter than 8 days and it starts one day following the announcement of public competition in the periodical edition of the National Employment Agency.¹⁵⁵ The exception is the HRMS which does provide application deadlines at the top of the page where announcements are published. Another noteworthy downside of announcements' texts is that they refer interested candidates to the webpage of the HRMS to find preparatory materials and other instructions that would help them better prepare for a selection process, but do not provide precise direction other than the homepage. Finally, it is not immediately clear that candidates do not need to submit documents that are kept in official records, as more detailed explanation is provided only at the bottom of announcements. Interviewed former candidates did not experience major issues with the clarity of vacancy announcements. However, one of them had to submit documents usually stored by the administration,¹⁵⁶ while another pointed out that prior work experience in civil service was of help to know in advance what is needed documentation wise.¹⁵⁷ In general, when applying for publicly announced vacancies, candidates are usually unclear about where they can find preparatory materials for competence testing.¹⁵⁸

As in the baseline PAR Monitor, the state exam requirements for senior civil servants remain a major burden for external candidates. Individuals applying for senior positions need to have the state exam within 20 days after the deadline for receiving applications which is once again assessed as unreasonable barrier. At the same time, no change has been recorded since the 2017/18 monitoring cycle on possibilities to supplement missing documentation subsequently, within a reasonable timeframe. Legislation does not foresee such possibilities and in case there is a missing document a candidate may be automatically disqualified from the selection procedure.

Finally, since the baseline PAR Monitor, no changes have been recorded in approach to annulled announcements - information about annulled announcements with explanations is still not made publicly available either by administration bodies or the HRMS.¹⁵⁹ The CSL stipulates that when a competition fails all the participating candidates are notified about the outcome, but it does not specify, for instance, how public competitions annulled on the grounds of no applications received are communicated.

Surveys return slightly more positive perception compared to the PAR Monitor 2017/18. Although less than a half of civil servants believe that the recruitment into the civil service is based on merit (45%), and the public is even more sceptical (33%), agreements that the merit principle is ensured still went up in both cases (from 35% and 17% respectively). In addition, nearly two thirds of civil servants (61%) perceive that the recruitment procedures ensure equal opportunity to all candidates regardless of any personal trait which could be basis for unfair discrimination which is a noteworthy increase of almost 8 percentage points since the PAR Monitor 2017/18.

153 Interview with HRMS representative, held on 22 October 2020.

154 Interview with former candidates, held on 5 and 6 November 2020.

155 Art. 12 of the Regulation on internal and public competition for filling vacancies in state administration bodies, Official Gazette No. 2/2019, available at: <https://bit.ly/3dFzGYN> (last accessed on 9 June 2021).

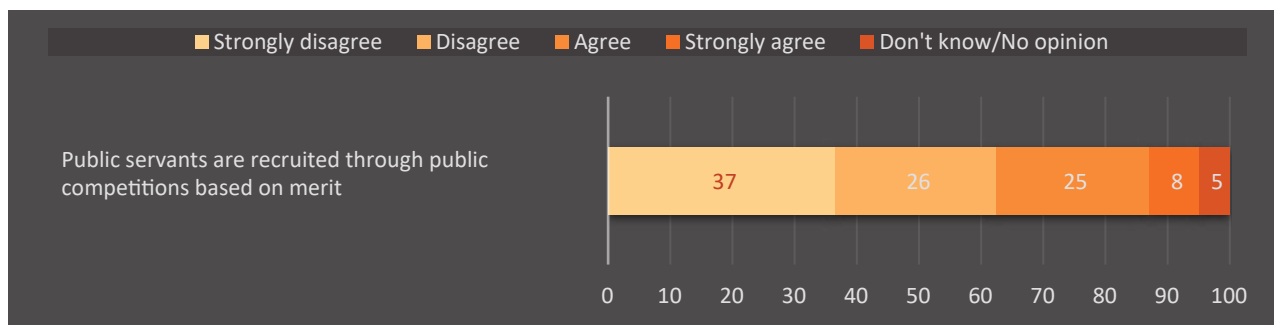
156 Interview with a former candidate, held on 5 November 2020.

157 Interview with a former candidate, held on 6 November 2020.

158 Interview with a HRMS representative, held on 22 October 2020.

159 The interview with the HRMS representative confirmed that the bodies do not make information about annulled announcements publicly available.

Chart 7. Public perception of merit-based recruitment in civil service (%)

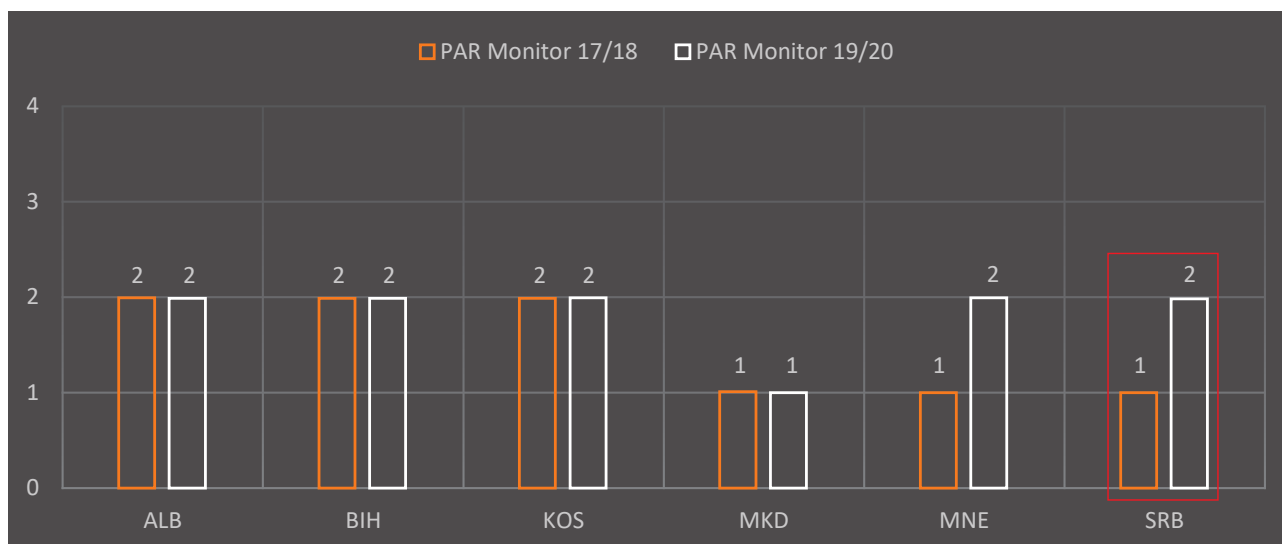


Note: Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. Based on a total public perception survey sample, N=1005.

Openness, transparency, and fairness of recruitment into civil service have improved comparatively since the baseline monitoring, and the indicator value went up from 1 to 2. Importantly, changes to the civil service legal framework brought about less demanding application process for external candidates for civil service jobs and reduced paperwork. Also, sample of recruiting state administration bodies have been found to reveal publicly more decisions and reasoning of selection committees than the ones analysed in the PAR Monitor 2017/18. Finally, more favourable public opinion and perception of civil servants on meritocracy of recruitments have contributed to this upward development. Despite this, there are elements of recruitment processes that either pose burden for potential applicants (such as no possibility for supplementing applications, state exam requirements, formal and complex tone of public announcements) or remain non-transparent still (such as publicity of decisions and reasoning for annulling public competitions).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 10: Indicator PSHRM_P3_I1: Openness, transparency, and fairness of recruitment into the civil service



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PRINCIPLE 4: DIRECT OR INDIRECT POLITICAL INFLUENCE ON SENIOR MANAGERIAL POSITIONS IN THE PUBLIC SERVICE IS PREVENTED

WeBER indicator PSHRM_P4_I1: Effective protection of senior civil servants' positions from unwanted political interference

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 The Law prescribes competitive, merit-based procedures for the selection of senior managers in the civil service	1/2	2/2
E.2 The law prescribes objective criteria for the termination of employment of senior civil servants	0/2	0/2
E.3 The merit-based recruitment of senior civil servants is efficiently applied in practice.	0/4	0/4
E.4 Acting senior managers can by law, and are, only appointed from within the civil service ranks for a maximum period limited by the Law	0/4	0/4
E.5 Ratio of eligible candidates per senior-level vacancy	0/4	4/4
E.6 Civil servants consider that the procedures for appointing senior civil servants ensure that the best candidates get the jobs	1/2	0/2
E.7 CSOs perceive that the procedures for appointing senior civil servants ensure the best candidates get the jobs	0/2	0/2
E.8 Civil servants perceive that senior civil servants are appointed based on political support	0/2	0/2
E.9 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
E.10 Civil servants consider that senior civil servants would not implement and can effectively reject illegal orders of political superiors	1/2	0/2
E.11 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
E.12 Civil servants perceive that senior civil servants are not dismissed for political motives	1/2	0/2
E.13 Civil servants consider the criteria for dismissal of senior public servants to be properly applied in practice	0/2	0/2
E.14 CSOs consider senior managerial civil servants to be professionalised in practice	0/2	0/2
E.15 Civil servants perceive that senior civil servants do not participate in electoral campaigns of political parties	0/2	0/2
E.16 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
Total score	4/40	6/40
Indicator value (scale 0 – 5)¹⁶⁰	0	0

To measure protection of senior civil servants (SCS) from political influence, SIGMA's methodology was used for calculating indicator elements 1, 2, 3 and 5. While the criteria for competitive, merit-based procedures for the selection of SCS is partially met, merit-based recruitment is assessed as inefficiently applied in practice, and criteria for termination of SCS employment as deficient.

Namely, the CSL clearly includes the principle for accessing SCS positions, with clear and non-discriminatory eligibility criteria. Shortcomings that question the merit principle relate to, for example, possibility of appointing

¹⁶⁰ 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

persons without prior competition with an acting status, that can last for 6 plus 3 additional months, no chances to appeal SCS recruitment decisions besides the administrative court proceedings, or a short timeframe for submitting applications for SCS vacancies that can be shorter than 10 days following announcements. Also, in contrast to the PAR Monitor 2017/18, average number of eligible candidates per senior-level vacancy in 2019 was below 1 which suggests that potential candidates are discouraged to apply. Insight into the number of competitively recruited SCSs, gained through FOI requests, revealed that less than a third (32%) of SCS positions were staffed by internal or external competition in the monitoring period. More precisely, on 31 December 2019, 124 of 379 positions in senior civil service were staffed following a competition.

CSL amendments aimed to control the possibility of appointing persons with an acting SCS status by stipulating that the acting positions can be occupied only from within the civil service ranks if civil servants meet the job criteria. The amended Law further regulates that if after six months, plus additional three, the government fails to competitively appoint a senior civil servant to fill the position occupied by the acting SCS, the acting status is terminated, and the position should remain vacant. Nevertheless, there were no tangible improvements in practice since the baseline PAR Monitor, i.e., after the amendments to the CSL were introduced. Individuals in acting status can remain in this position even after the timeframe prescribed by law has expired.¹⁶¹ Moreover, the review of government's appointments for the period 1 January 2019 – 31 December 2019 shows that the Government made as many as 624 appointments on acting positions, which makes 94% of the total number of appointments in the state administration for the same period. What is more, the same individuals have been re-appointed multiple times for additional periods of 3 months, thus exceeding legally permitted maximum of 6 plus 3.

Criteria for the termination of work of senior civil servants still needs to be further specified. Besides generally objective criteria for termination of work and dismissal, a SCS can also be dismissed if superiors determine there has been serious disturbance in the functioning of a state body that a SCS managing which leaves a room for political discretion. This provision has been slightly changed in 2018 to say that such disturbances include accountability for not achieving workplan or strategic objectives. However, it still does not elaborate clearly how this will be assessed and is therefore still deemed discretionary and non-objective.

As noted in the PAR Monitor 2017/2018, a particularly concerning phenomenon is the existence of political vetting procedures, outside of the civil service legislation, in the process of appointing SCS. Namely, the Rules of Procedure of the Government authorise the governmental Personnel Committee, a political body comprising high-level officials, to propose to the Government nominations, appointments, and dismissals within the competence of the Government.¹⁶² Although the scope of authority of this committee is not clearly explained, all candidates that are to be appointed by the Government must go through this body first. In that sense, the Personnel Committee still plays a role of additional, political filter for senior level recruitments in practice.¹⁶³ Along these lines, ministers' proposals for persons to be appointed to SCS position, based on competition results, can remain within the Personnel Committee for several months before the Government eventually makes an appointment, if at all.¹⁶⁴

The survey of civil servants, as in the baseline monitoring, did not return optimistic results although perceptions have changed for a better in few cases. For instance, around a third of surveyed civil servants believe that procedures for appointing SCS ensure that the best candidates get the job (32%), compared to 23% in the baseline cycle. The same share of around a third respondents was able to say that in their institution SCS rarely or never get dismissed for political motives, with again slight increase compared to the baseline survey, for 4 percentage points.

Additionally, as low as 16% of surveyed civil servants deny the relevance of political support in appointments, saying this happens never or rarely, and just 18% disagree that SCS positions are subject to political agreements between parties. In both cases, percentages are slightly higher than in the PAR Monitor 2017/18, for 4 and 5 percentage points respectively, though with relatively high share of "don't know" responses on both issues (27%).

161 Interviews with a senior civil servant held on 12 October 2020 and with a former senior civil servant on 8 December 2020.

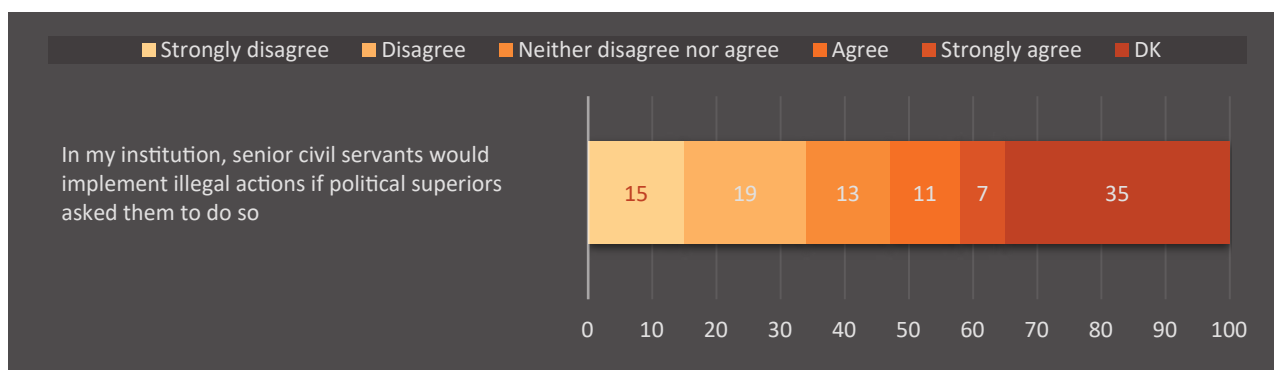
162 Art. 31 of the Rules of Procedure of the Government, Official Gazette No. 61/2006-3, 69/2008-3, 88/2009-72, 33/2010-6, 69/2010-3, 20/2011-10, 37/2011-3, 30/2013-4, 76/2014-3, 8/2019-79 (another bylaw), available at: <https://bit.ly/2SjtUhn> (last accessed on 9 June 2021).

163 Interview with a former senior civil servant on 8 December 2020.

164 Interview with a senior civil servant held on 12 October 2020.

Along the same line, somewhat more surveyed civil servants than before were able to confirm that SCS never or rarely participate in electoral campaigns of political parties (31%), or that criteria for their dismissal is, always or often, properly applied in practice (24%). Still, a large share of those who do not know has additionally grown since the 2017/18 cycle and stands at 44% for the former, and at 53% for the latter issue. Finally, a third (34%) disagrees in this monitoring cycle that senior civil servants would implement illegal actions if political superiors asked them to do so, marking a 5.5 percentage points increase since the baseline survey, with share of “don’t know” responses remaining at 35%. The fact that such a large group of survey respondents opted for “don’t know” responses, sometimes even more than half of them, is indicative once again of potential hesitation to disclose opinions on politically sensitive issues.

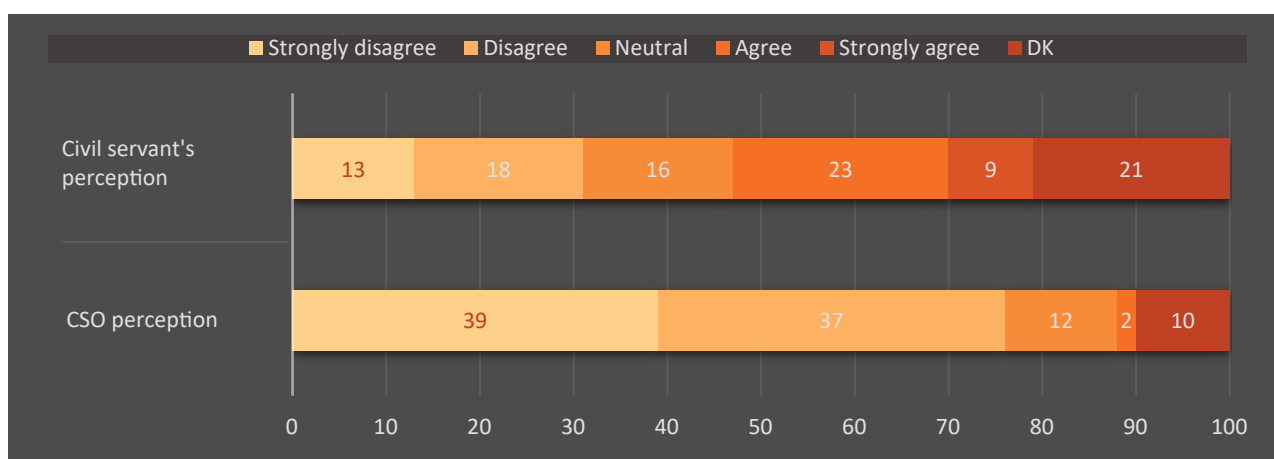
Chart 8 Civil servants’ perceptions on implementing illegal orders (%)



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 thus questions was n=1307.

Finally, opinions of CSOs suggest a great mismatch with civil servants’ experiences. That is, only 2% of CSOs representatives could agree that procedures for appointing SCS ensure that the best candidates get the jobs (no respondent strongly agreed) as opposed to almost a third of surveyed civil servants in agreement (chart x). Similarly, no CSO respondent believes SCS are professional in practice, rather than political favourites, with disagreement going up to 80% sharp.

Chart 9. Procedures for appointing senior civil servants ensure that the best candidates get the jobs: CS vs CSO (%)

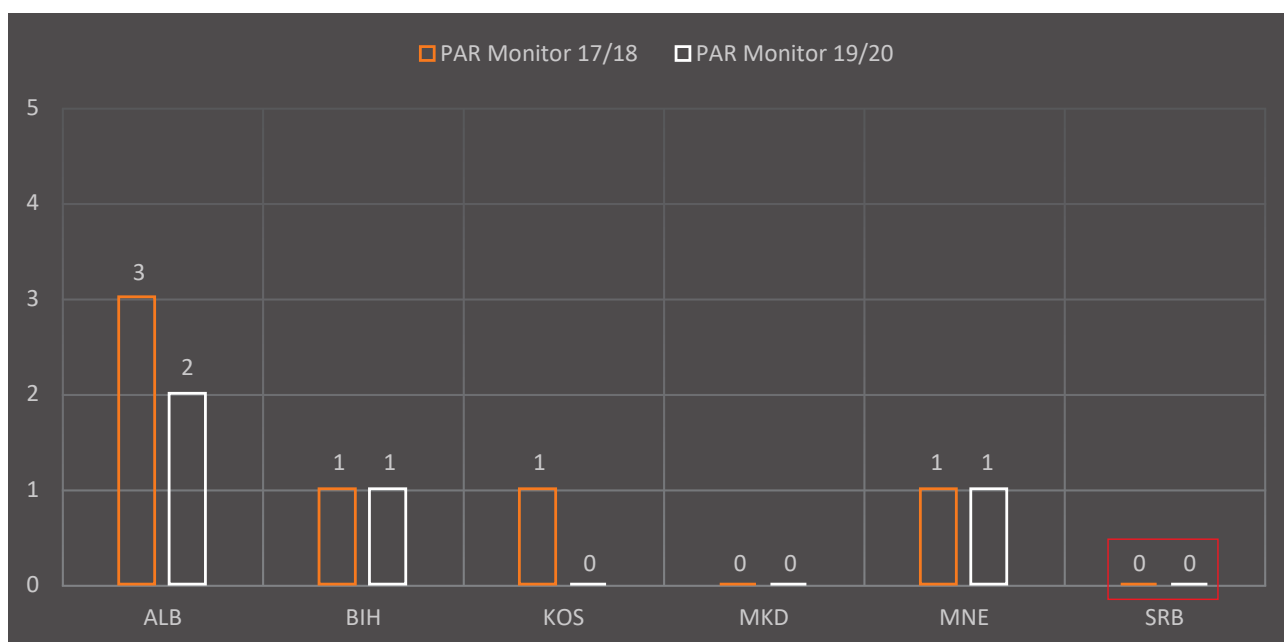


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was in CSO survey n=154; in CS survey n=1307.

There has been a slight deterioration overall in the protection of SCS positions from undesirable political influence and the indicator value of 0, established in the baseline monitoring, still holds. The perception of civil servants is somewhat more affirmative, as in some other indicators in PSHRM area. Nevertheless, the application of merit-based recruitment and termination of SCS's employment remains disputable in practice. Above all, number of appointments to acting senior positions is still in excess and such appointments are oftentimes in conflict with civil service legislation. Moreover, the average number of eligible candidates per senior-level vacancy remains quite low, and the Government, through its Personnel committee, can exercise a veto on appointments of persons who went through the competition process for no objectively elaborate reasons. Finally, CSOs in Serbia have not changed their negative stance and believe that SCS layer lacks in meritocracy in recruitment and that is highly politicised.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 11: Indicator PSHRM_P4_I1: Effective protection of senior civil servants' positions from unwanted political inference



Regional PAR Monitor reports with results for all WB administrations are 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.

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 The civil service remuneration system is simply structured	2/4	2/4
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
E.3 Information on civil service remuneration system is available online	2/6	2/6
E.4 Citizen friendly explanations or presentations of the remuneration information are available online	0/2	0/2
E.5 Discretionary supplements are limited by legislation and cannot comprise a major part of a civil servant's salary/remuneration	4/4	2/4
E.6 Civil servants consider the discretionary supplements to be used for stimulating and rewarding performance	1/2	0/2
Total score	13/22	10/22
Indicator value (scale 0 – 5)¹⁶⁵	3	2

As in the baseline PAR Monitor, the remuneration system for civil servants in Serbia is assessed as partially simply structured, as there are categories of civil servants to whom different rules apply from those set by the legislation on remuneration. Pursuant to the Law on Salaries of Civil Servants and General Employees, salaries are composed of basic salary and its supplements.¹⁶⁶ The salary base is unique, i.e. the same for all civil servants, and is determined by the Law on Budget of the Republic of Serbia for each fiscal year. The basic salary is calculated by multiplying a coefficient with the salary base, and coefficients are determined by classifying civil servants into 13 pay groups (groups I-IV for SCS, and VI-XIII for executive positions). The Law provides a table with salary groups and coefficients for corresponding civil service categories/ranks.

Nevertheless, some exceptions apply and different coefficients are defined for certain categories of employees as in the case of Tax Administration.¹⁶⁷ Similarly, the Government adopted a special regulation on coefficients for the calculation and payment of salaries of employees in the Administration for Execution of Criminal Sanctions.¹⁶⁸ Also, those working in special organisational units of state institutions responsible for combating organised crime, and those performing functions and tasks in the Prosecutor's Office for war crimes, are generally eligible for twice the salary of employees working on the same positions in other state institutions.¹⁶⁹ The existence of separate bylaws, introducing such special regimes and conditions, contributes to the fragmentation of the remuneration system for civil servants, leading to the assessment of its partial simplicity.

¹⁶⁵ 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

¹⁶⁶ Art. 2 of the Law on Salaries of Civil Servants and General Employees, Official Gazette No. 62/2006-12, 63/2006-20 (corr.), 115/2006-149 (corr.), 101/2007-4, 99/2010-3, 108/2013-11, 99/2014-10, 95/2018-377, available at: <https://bit.ly/3w45YUm> (last accessed on 9 June 2021). The most recent version of the Law has been implemented since January 1, 2019).

¹⁶⁷ Art. 5 and 7, Rulebook on Salaries and Other Incomes of Employees in the Ministry of Finance - Tax Administration, Official Gazette no. 43/2019, 78/2020, available at: <https://bit.ly/3xXi965> (last accessed on 9 June 2021).

¹⁶⁸ Regulation on Coefficients for Calculation and Payment of Salaries in the Administration for Execution of Criminal Sanctions, Official Gazette No. 16/2007, 21/2009, 1/2011 - CC, 83/2011, 102/2011 available at: <https://bit.ly/2U0kQFk> (last accessed on 9 June 2021).

¹⁶⁹ Regulation on salaries of persons that perform tasks in special organisational units of state bodies responsible for combating organised crime, Official Gazette No. 14/2003, 67/2005, 105/2005, 114/2014, available at: <https://bit.ly/3xSLrCJ>, and Regulation on salaries of persons that perform functions and tasks in the prosecutorial office for war crimes and special organisational units of state bodies in war crimes procedures, Official Gazette No. 97/2003, 67/2005, available at: <https://bit.ly/3gVu5Q1> (last accessed on 9 June 2021),

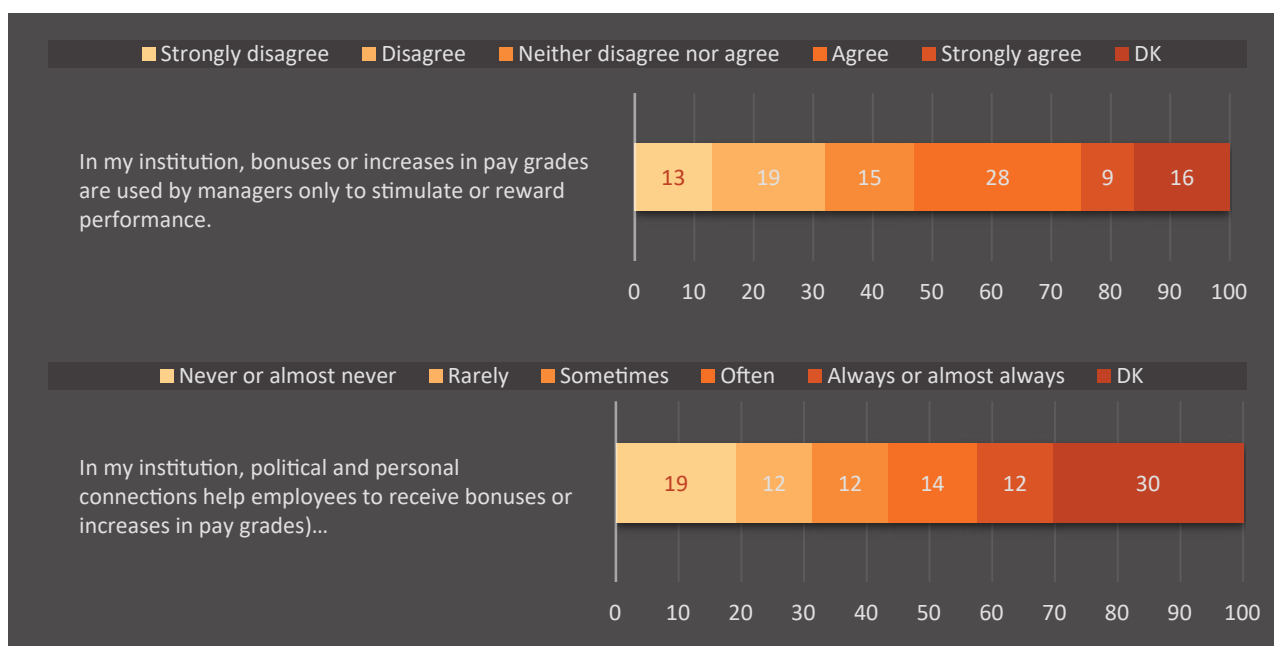
No changes have been observed compared to the 2017/18 cycle when it comes to definition of salary supplements. The legislation foresees clearly limited and defined conditions for salary supplements in addition to the basic salary and defines relationship between different types of these supplements.¹⁷⁰

On a less positive note, the online availability of information on civil service salaries is limited, and there are still no citizen-friendly approaches to present this information. Analysis performed in line with the SIGMA's methodology informs that only general information on salary levels is easily accessible on the webpage of the HRMS, but neither is the salary information available in job announcements for civil service positions, nor is the information on average total salaries, disaggregated by different categories, easily available online for the public insight. Hence, no evidence was found in this monitoring cycle that efforts have been made to enhance availability and visibility of information on salaries for the public.

Furthermore, analysis of use, and limits in the use of discretionary supplements, was done in line with SIGMA's methodology in this monitoring cycle as well. Given that that the Law on Salaries of Civil Servants and General Employees does not envisage bonuses for civil servants, except for the Tax Administration for which separate rulebook defines bonuses, it is assessed that discretionary supplements are limited by legislation, and hence cannot in practice comprise a major part of salaries.

Finally, civil servants' perceptions on the fairness and transparency of remuneration system were measured through responses on following 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 x). Perceptions on both statements were somewhat more favourable compared to the baseline PAR Monitor. Namely, more than a third of civil servants (37%) agree with the first statement - 9 percentage points up since the baseline survey. On the second statement, about 31% claim that political and personal connections never or rarely help employees to receive bonuses or increases in pay grades. While this represents improvement for 4 percentage points compared to the baseline PAR Monitor, share of respondents who opted for "don't know" answers increased too (from 26% in 2017/2018 cycle to 30% in this monitoring edition).

Chart 10. Civil servants' perception of the use of bonuses and the relevance of personal and political connections (%)



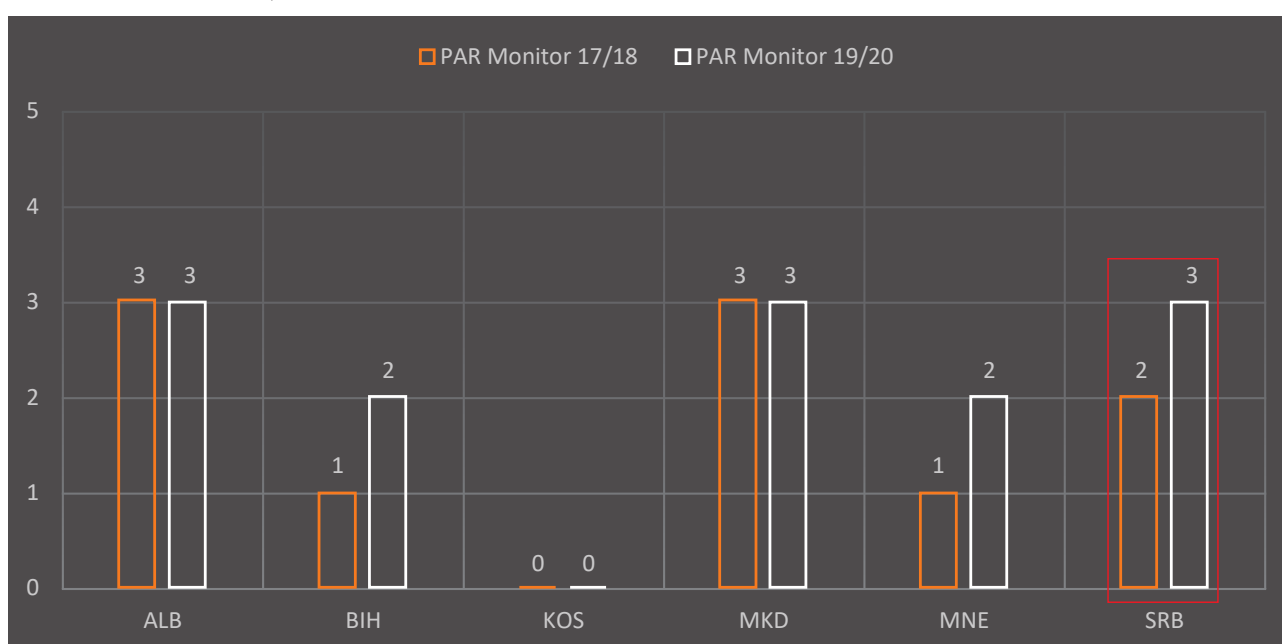
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=1296.

¹⁷⁰ Articles 23-38, the Law on Salaries of Civil Servants and General Employees. Supplements include those for overtime work, work on holidays, night work, additional workload, and for standby work.

Overall, two main developments have led to the increase of indicator value in this monitoring cycle. Civil servants have expressed a more convinced attitude than in the baseline PAR Monitor that the discretionary supplements are only used for stimulating and rewarding performance. At the same time, the fact that the legislation does not allow payment of bonuses for civil servants, making discretionary compensations clearly limited, contributes to a more positive assessment than in the 2017/18 monitoring cycle as well. However, a room for enhancing publicity of information on salaries in civil service has not been used in the meantime and scarce information that is available online is not explained in citizen-friendly language.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 12: Indicator PSHRM_P5_I1: Transparency, clarity, and public availability of information on the civil service remuneration system



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

PRINCIPLE 7: MEASURES FOR PROMOTING INTEGRITY, PREVENTING CORRUPTION AND ENSURING DISCIPLINE IN THE PUBLIC SERVICE ARE IN PLACE

WeBER indicator PSHRM_P7_I1: Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service¹⁷¹

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Integrity and anti-corruption measures for the civil service are formally established in the central administration	2/4	4/4
E.2 Integrity and anti-corruption measures for the civil service are implemented in central administration	2/4	2/4
E.3 Civil servants consider the integrity and anti-corruption measures as effective	1/2	1/2
E.4 CSOs consider the integrity and anti-corruption measures as effective	0/2	0/2
E.5 Civil servants consider that the integrity and anti-corruption measures are impartial	1/2	1/2
E.6 CSOs consider that the integrity and anti-corruption measures in state administration are impartial	0/2	0/2
E.7 Civil servants feel they would be protected as whistle blowers	0/2	0/2
Total score	6/18	8/18
Indicator value (scale 0 – 5)¹⁷¹	1	2

The first element of this indicator, looking whether integrity and anti-corruption measures for the civil service are formally established in the central administration, was calculated based on SIGMA's methodology, and assessed as partially met for two reasons. Firstly, the legislation is not found to include a maximum value threshold related to the receipt of gifts and benefits by all civil servants, and secondly, the Criminal Code is not exhaustive, i.e., it does not explicitly criminalise Illicit enrichment in Serbia.

When it comes to issue of receipt of gifts and benefits, the CSL stipulates that civil servants, or people closely related to them, cannot seek or receive any right, service or any other benefit that may be considered as a reward for their service and that may affect the impartiality of their work but without defining the maximum value threshold. Civil servants may also receive presents of lower value in situations when lower value presents are ceremonially or traditionally exchanged, and they cannot be in form of money.¹⁷² CSL further stipulates civil servants are obliged to notify their superior as soon as they receive any kind of present for the work they have done. In addition, the Law on Prevention of Corruption, which applies to SCS in the domain regulated by this law, stipulates that public officials can keep a gift if its value does not exceed 10% of average net monthly salary in Serbia, but also provided that the total value of kept gifts does not exceed the amount of a net salary in a calendar year.¹⁷³ The same legislation further regulates that only gifts that can be received are those ceremonially and traditionally exchanged. However, these provisions apply to SCS only, and not to all civil servants.

For the second indicator element, also calculated based on SIGMA methodology, the criteria are assessed as partially met as well. The observed documents on integrity policy for civil service included PAR Strategy AP 2018-2020, and the AP for Chapter 23 in Serbia-EU negotiations. The scope of integrity policy in these documents was well defined, and contained clear objectives based on the analysis of the current state of play. Action plans included specific activities, timelines, and costs for each area of intervention, as well as the responsibility for implementing activities. However, although monitoring reports on the implementation of

171 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

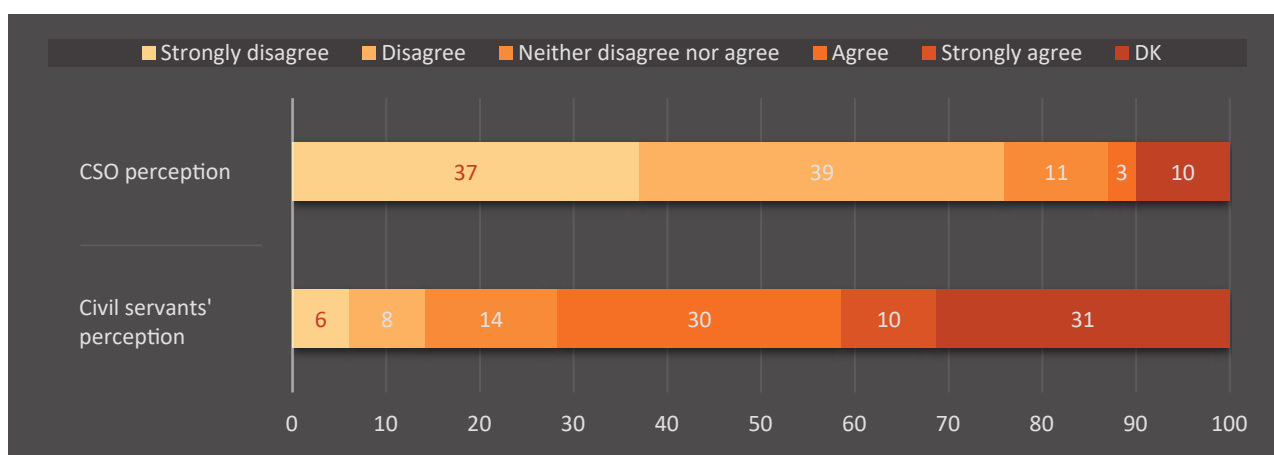
172 Art 25a, Law on Civil Servants.

173 Article 60, the Law on Prevention of Corruption, Official Gazette no. 35/2019-6, 88/2019-3, 11/2021-3, available at: <https://bit.ly/3zREq6P> (last accessed on 9 June 2021).

both action plans are publicly available, not all were published regularly. Report on implementing the AP for Chapter 23 in 2019 was not present at the webpage of the Ministry of Justice at the time of WeBER monitoring, with the latest available being the one with implementation status on 31 December 2018.¹⁷⁴

When it comes to ensuring integrity in the civil service, roughly 40% of surveyed civil servants consider integrity and anti-corruption measures in their institutions as effective, and impartial, while CSOs perceptions are drastically lower – around 3% agree these measures effective, and only 1% see them as impartial. Whereas this is an increase in perception of civil servants compared to the 2017/18 cycle (33-34% on both effectiveness and impartiality of integrity measures), civil society's contrasting standpoint remained almost unaltered, with 2% of agreement on both issues, and speaks volumes on their trust in formal anti-corruption procedures and mechanisms.

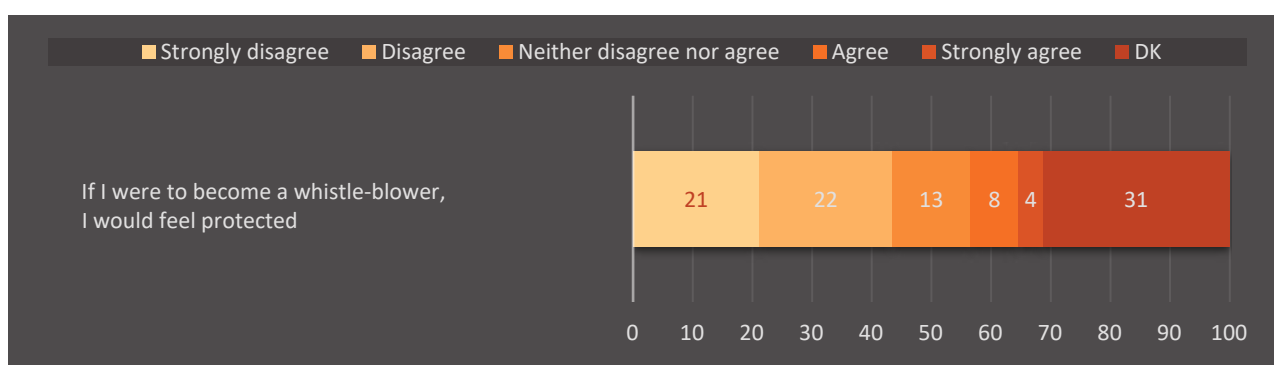
Chart 11. Effectiveness of integrity and anti-corruption measures: civil servants' and CSO perceptions (%)



Note: 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=1268 for civil servants, and n=154 for CSOs.

Finally, even though the Law on Whistle Blower Protection was introduced in 2014, civil servants do not appear comfortable with revealing information about unethical behaviour in their institutions. More specifically, as low as 12% of civil servants report they would feel protected as whistle blowers. Such perception is almost identical to the one measured in the PAR Monitor 2017/18 (11% of agreement) and informs not only of how firmly disinclined civil servants are to report wrongdoing in their institutions but how they feel about formal mechanisms for safeguarding whistleblowing institute.

Chart 12. Civil servant perception of the protection of whistle blowers (%)



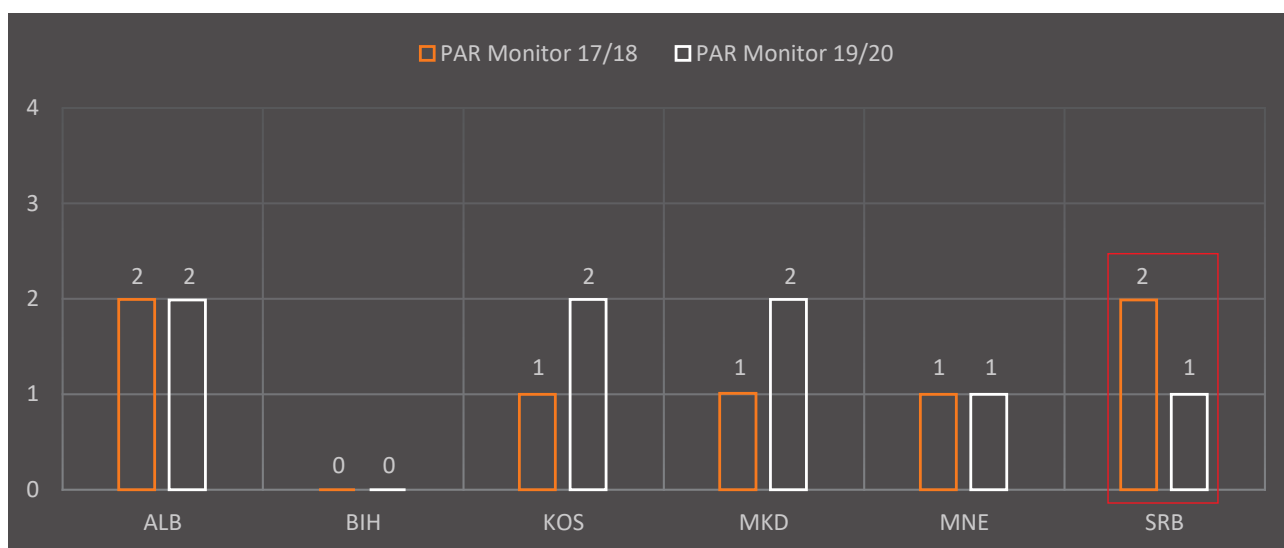
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for this question was n=1268.

¹⁷⁴ Available at: <https://www.mpravde.gov.rs/tekst/26470/izvestaji-o-sprovođenju-akcionog-plana-za-poglavlje-23.php> (last accessed on 9 June 2021).

No substantial changes have been recorded since the baseline 2017/18 cycle when it comes perceptions of surveyed civil servants and CSO representatives. While former are of the impression that integrity and anti-corruption measures in the central administration are effective and impartial to an extent, latter have expressed high suspicion, or even distrust, that such measures have any practical effect. That said, establishment of integrity and anti-corruption measures is assessed as partial, which has rendered lower indicator value when compared to the baseline PAR Monitor.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 13 Indicator PSHRM_P7_I1: Effectiveness of measures for the promotion of integrity and prevention of corruption in the civil service



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IV.5 SUMMARY RESULTS FOR THE PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT AREA

In PSHRM area, monitoring findings could not confirm that the Government in Serbia either stores reliable data on public service or publishes them. Likewise, information that is available in the database is not available in an open format and cannot be filtered in terms of different categorisations (e.g., per gender or ethnicity). On a more positive note, the Government is found to work on promotion through difference channels of at least certain information about public service, i.e., on professional development of civil servants.

While the number of temporary engagements in Serbian civil service is regulated by legislation, other areas concerning temporary engagements are less so. For instance, no specific criteria are found for the admission of individuals to these positions, hiring procedure is not open and transparent and duration of these contracts is not strictly limited. What adds to this rather negative state of play in temporary engagements is results from the survey of civil servants. Put differently, civil servants see temporary engagements as a rule and report that temporary contracts are often extended to more than one year.

As for public competitions for civil service positions, these are generally made publicly available. However, announcements are still not written in a clear, simple, and understandable language to the broader public and there are aspects of the procedure that make it more difficult for external candidates to get a position in civil service. On the other hand, the overall competition procedure is assessed as simpler than in the baseline PAR Monitor in the sense that it imposes minimum administrative burden on candidates. Nevertheless, the CSL does not give options to candidates to supplement missing documents (even though it happens in practice). Furthermore, the reasoning behind decisions of selection panels and information about annulled public competitions are not made publicly available.

The analysis of professionalism of senior civil service positions has not returned positive results, and it has even slightly worsened since the baseline PAR Monitor. Whereas the Law on Civil Servants was found to prescribe only partly competitive, merit-based procedures for the selection of individuals in these positions, it was not found to prescribe objective criteria for termination of employment. In addition, ratio of eligible candidates per senior-level vacancy is very low. As in the baseline PAR Monitor, the duration of appointments to acting positions is not limited in practice and the civil service legislation is constantly breached in this regard. These (re)appointments of individuals in acting statuses, to fill in for vacant senior civil service positions, remain politically driven. Moreover, civil servants themselves believe there is a significant political influence on selection into senior positions. CSO representatives are even more sceptical in their responses to the extent that the percent of those who report that professionalism matters when it comes to senior managerial positions in civil service is close to 0.

Furthermore, the remuneration system is predominantly simply structured, and it clearly defines options for salary supplements. However, the online availability of information concerning remuneration system is limited and no citizen-friendly explanations of this system could be found.

Finally, it is found that integrity and anti-corruption measures are only partially established and implemented in central administration. Again, there is a substantial mismatch in how civil servants and CSO representatives perceive integrity and anti-corruption measures. While the former are fairly sceptical, it can be said that the latter do not see these measures as effective or impartial at all.

IV.6 RECOMMENDATIONS FOR PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2018

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. Legislation should prescribe that the CPR includes data on all forms of temporary engagements in the civil service. The data should follow the current structure of the data on civil servants, with additional fields on the type and duration of the temporary contract. This will allow for more comprehensive monitoring of the overall HRM policy in the state administration.	Fully implemented	The Law on Civil Servants regulates the Central Personnel Registry. ¹⁷⁵ Article defining the content of the CPR was amended in December 2018 (following the PAR Monitor 2017/2018 publication) to prescribe more detailed categories of information to be included in the CPR. ¹⁷⁶ For civil servants and general employees, the Law requires the information on the type of employment and the date of its establishment. The CPR should also contain information on "other persons performing work in the state body", and most importantly – the type of engagement and the date of commencement, including the date of termination of work.
2. CPR should be linked to the payroll system, thus ensuring full reliability of the data contained therein. Failure to input the data into the CPR would 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	Based on the CSL, the CPR should include data required for salary calculation for civil servants and general state employees, although not for persons on temporary contracts. Current CPR is not interoperable with the payroll system but that the new information system is being developed and is expected to be put into use. This system is expected to be interoperable with other relevant systems. ¹⁷⁷
3. The Government should enact a special Regulation on the CPR. The Regulation should explicitly prescribe the frequency and methods of updating the Registry, its management and monitoring, as well as the sanctions for bodies that do not comply with the CSL and the Regulation.	No action taken	Although the CSL prescribes adoption of the regulation on CPR, there is no evidence available that the regulation was adopted.
4. Publishing statistical data on the civil service should be made legally binding, in open data formats and including gender segregation of the data. The data should be published at MPALSG and HRMS webpages, in addition to the central Open Data Portal. Machine readable formats of the data should be available for download free of charge.	No action taken	No available evidence indicates change since the baseline monitoring in terms of mandating publication of statistical data on the civil service. The Law on the eGovernment Portal obliges public bodies to publish open data from the scope of their competence on the Open Data Portal. ¹⁷⁸ No evidence of this practice has been identified in the case of data on civil service. The MPALSG published a single dataset on the Open Data Portal, but it does not relate to the civil service. ¹⁷⁹
5. The HRMS should produce and publish comprehensive annual reports on the implementation of laws and policies pertaining to human resource management in the civil service. The reports should cover at least planning and recruitment, performance appraisal, career development, professional development, remuneration policy, disciplinary procedures, and corruption/integrity issues. 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 whether it has become more or less professionalised, de-politicised, as well as whether capacities have improved or not.	No action taken	A single comprehensive report does not exist. As identified in the indicator P2_I1 of this chapter, there are easily accessible separate reports for disciplinary procedures, integrity measures and training of civil servants. These reports include only general statements on quality and outcomes. The HRMS also confirmed (through FOI) that they developed reports on appraisals and career development (for 2019), but these are not publicly available. The HRMS does not develop reports on planning and recruitment or salaries (confirmed through FOI).

¹⁷⁵ Article 160, Law on Civil Servants, Official Gazette RS no. 79/2005-13, 81/2005-11 (correction), 83/2005-21 (correction), 64/2007-3, 67/2007-26 (correction), 116/2008-76, 104/2009-27, 99/2014-7, 94/2017-5, 95/2018-366, 157/2020-3.

¹⁷⁶ Draft Law Amending and Supplementing the Law on Civil Servants, available at: <https://bit.ly/3xckLwH> (last accessed on 9 June 2021).

¹⁷⁷ Interview with a senior civil servant held on 12 October 2020.

¹⁷⁸ Article 27, Law on eGovernment, Official Gazette RS no. 27/2018-25.

¹⁷⁹ Available at: <https://data.gov.rs/sr/organizations/ministarstvo-drzhavne-uprave-i-lokalne-samouprave/> (last accessed on 9 June 2021).

<p>6. The HRMS should be obliged to implement regular annual staff satisfaction surveys, serving for self-assessment purposes, and feeding into the annual HRM policy reports.</p>	<p>Partially implemented</p>	<p>According to 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,¹⁸⁰ the HRMS can use staff satisfaction surveys to collect information for analysing the state of play regarding the staff turnover in the state administration. While original sources of information are official records, staff satisfaction survey “may” be used, and the instruction does not specify the regularity. Once a year and more often, if necessary, HRMS reports to the Government on the observed state of play.¹⁸¹</p>
<p>7. The Government, the MPALSG and the HRMS should actively promote reports on the civil service through the most popular nation-wide means, such as webpages, social media, press releases and media statements.</p>	<p>Partially implemented</p>	<p>NAPA uses social media, webpage, and online media to actively promote quantitative data regarding training for civil servants. MPALGS had only two social media posts with such content during the monitoring period. Statistical data or data from report(s) on civil servants have been published only for a single topic (training) during the monitored period and only by two institutions. Meanwhile, the HRMS established a new practice of sharing HRM related information on their Facebook page and Viber community group.</p>
<p>8. The Government should explicitly limit the duration 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 of similar complexity.</p>	<p>No action taken</p>	<p>There is no evidence of change since the baseline monitoring (see more in the indicator P2_I2 of this chapter). The Law on Civil Servants (Art. 63) does not give a precise limit of the duration of the fixed-term employment. The Labour Law (Art. 197) envisages that a temporary job contract may last not more than 120 working days while the duration of service contracts (Art. 199) is not specified. The Law on Civil Servants does not explicitly regulate selection criteria for fixed-term employment of civil servants, but it defines general employment criteria for all civil servants (Art. 45). The Labour Law does not specify criteria for selection of temporary engagements.</p>
<p>9. Institutions should be obliged to conduct public calls for temporary staff in the civil service and examine competencies of candidates based on clearly set criteria for temporary engagement. The calls should be advertised through channels used for public competitions for permanent employment in the civil service. The calls should contain clear elements such as the following: job description, requirements/competences, information on remuneration, testing procedure, necessary documentation, and deadlines for applying. Reports on the results of temporary engagement procedures should be made public as a rule.</p>	<p>Initiated</p>	<p>According to 2018 amendments to the CSL, public competition should take place for hiring fixed-term employees in case there is a temporarily increased volume of work that the existing number of civil servants are not able to perform. The obligation to publish calls for fixed-term staff therefore relates to one possible situation out of several grounds for fixed-term employment described in the CSL article 63. This provision of the Law has yet to be enforced as of 2023.¹⁸²</p>
<p>10. State administration bodies should advertise public vacancies through all available means, including social media channels. The HRMS and the institutions advertising vacancies should introduce advanced search engines on their respective web pages for filtering vacancy announcements. Applying these methods would ensure a wider reach to potential candidates and increase the number of candidates per vacancy.</p>	<p>Partially implemented</p>	<p>Every of the five public competitions analysed in this PAR Monitor were found on the webpage of the HRMS and in the periodical magazine of the National Employment Agency. There were no announcements found on the eGovernment portal or social media of the responsible bodies. Even though the HRMS started advertising competitions on social networks, not all examined competitions were identified. While the HRMS somewhat improved the filtering of vacancies, no evidence is found that institutions introduced advanced search engines on their respective webpages for filtering vacancy announcements.</p>

180 Available at: <https://bit.ly/3juNuZO> (last accessed on 9 June 2021).

181 HRMS, “Priliv i odliv kadrova”, <https://www.suk.gov.rs/tekst/909/priliv-i-odliv-kadrova.php> (last accessed on 9 June 2021).

182 See more at: <https://www.paragraf.rs/dnevne-vesti/071220/071220-vest16.html> (last accessed on 9 June 2021).

<p>11. State administration bodies should invest effort in making public competition announcements more understandable to external candidates. They should translate the bureaucratic language 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. This sheet should be updated regularly as candidates send new requests for clarifications, so that all interested are informed in a timely manner. All this will incentivise external candidates to apply and ensure that they understand the job description and all requirements for applying. In the long run, this will ensure a more competitive recruitment process.</p>	<p>Partially implemented</p>	<p>Texts of public competition announcements are lengthy and written in a bureaucratic style. While there is a very long description of competences to be tested during the selection process and how, there are no visual elements to make different application stages clearer for candidates. Jargon is commonly used when speaking of competences ("special functional competences") which candidates are not expected to be familiar with. The HRMS has increased activity on supporting potential candidates in 2020, which fell outside of this monitoring period: it started posting visually attractive content on Facebook, it developed a "Candidate's corner" section on the webpage with explanations of some elements of the competition, including a map of competition process from the candidate's perspective,¹⁸³ and it provides the possibility for interested candidates to publicly post questions on a Viber community and receive replies that all members of the community can see.</p>
<p>12. The Government should remove elements that discourage external candidates from applying. For example, 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. For junior adviser and junior associate positions, the law should clearly stipulate that any work experience in the same profession in the duration of one year or, alternatively, five years of any other work experience (before obtaining the required qualification level) counts as relevant proof of the required previous work experience, considering that this is an entry level position. This would create equal conditions for external candidates and candidates applying from within the administration.</p>	<p>Partially implemented</p>	<p>Article 11 of the Regulation on internal and external competitions states that individuals applying for senior civil service positions need to submit a proof of passing the state exam within 20 days after the deadline for application. This means that senior civil servants are expected to have state exams prepared when applying for a given position. The 2018 amendments to the CSL improved the wording on the requirements for junior adviser and junior associate positions: "completed traineeship" is replaced with "at least one year" (for junior adviser) or "at least nine months" (for junior associate) of working experience within the professional field or at least five years of experience in the state bodies.</p>
<p>13. The document submission stage should impose a minimum administrative and paperwork burden on candidates. It should be organised in at least two phases, with only an application form requested in the first instance. The form should contain relevant information about the candidate, as well as the candidate's statement, under a material liability, that they fulfil the requirements and that the information given is accurate. In the subsequent phases, when proof of education and professional experience is submitted, candidates should be allowed to supplement missing documentation within at least five working days.</p>	<p>Fully implemented</p>	<p>Article 56 of the CSL stipulates that the selection process is to be conducted in multiple mandatory stages, whereby interview phase is the last one. According to article 55 of the Law, during the first phase applicants are expected to fill out and submit the application form with mandatory information on candidates' names, address, and ID card number. Hard-copy documents (or certified copies) are asked in the later stages, and only for candidates who make it to the interview. Therefore, it is concluded that the submission stage imposes minimum administrative burden on candidates.</p>
<p>14. The specific elements of the recruitment procedure should be professionalised and made fully transparent to guarantee a fully impartial and unbiased selection of the candidates. First, candidates should be ranked based on the complete testing process and not solely on interviews. Written tests should be made anonymised and mandatory, and there should be written evidence for each examination phase. Second, the selection committee members should be trained on how to conduct the recruitment procedure and interview candidates for jobs in the civil service. Reporting requirements from the recruitment procedure should be prescribed in detail for each requirement, so as to ensure a clearly visible rationale for the ranking and selection of candidates. The legislation should set more explicit grounds for the annulment of public competitions and remove the space for circumvention.</p>	<p>Fully implemented</p>	<p>The 2018 legal amendments brought more transparency and further professionalised the recruiting process. Candidates are ranked based on their competencies. Competences are tested in writing and orally (depending on the competence) and candidates are evaluated with points after each competence test. The committee keeps minutes of its work. There is no evidence of the training of selection committee members, but for the selection of senior civil servants, the HRMS representatives provides support to the High Civil Service Council on applying provisions of bylaws regulating competitions and competences and compiling tasks and simulations for examining special functional competences. The list of candidates under the code of their application and the name and surname of the candidate who was selected in the competition procedure are published on the internet presentations of the state administration bodies that announced the competition and the HRMS. Amendments further specified grounds for annulment of public competitions (article 60 CSL).</p>

183 HRMS, "Corner for candidates", available at: <https://bit.ly/3ycoZVd> (last accessed on 9 June 2021).

<p>15. The Government should ensure maximum transparency of the outcomes of the recruitment procedures. 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>The HRMS generally makes (1) the identity of successful candidates publicly available (by candidate's name only, as prescribed by article 57 CSL), as well as (2) the list of candidates who were not selected (by code numbers) available on its website. Other institutions are not consistent in following this practice (webpages of some bodies do not contain such information). Besides the ranking lists, decisions and reasoning on selection are not available, nor are decisions and reasoning for annulment disclosed to the public.</p>
<p>16. Explicitly define the term "serious disturbance" in Article 78 of CSL related to the criteria for termination of employment of senior civil servants. This will increase the objectivity and reduce possibilities for political influence.</p>	<p>Partially implemented</p>	<p>The relevant article has been modified to add that such disturbances include "accountability for not achieving workplans or strategic objectives". Although more specified than in the baseline monitoring, this provision can still leave room for discretion as the method or procedure by which such a failure can be determined is not specified.</p>
<p>17. The legislation should regulate the acting positions in a way which unequivocally shows the intention of regulating such a state as exceptional, temporary, and serving the sole purpose of ensuring continuity in the work of a body or sector with a vacant SCS position. Acting senior managers should only be possible to appoint from within the civil service ranks, ideally from within the same sector/organisation which the acting manager will head. Additionally, the legislation should allow the acting managers to automatically be appointed as senior civil servants if the body fails to successfully conduct a competition process within the legally prescribed timeframe.</p>	<p>Partially implemented</p>	<p>The 2018 amendments limited to an extent possibility for abuse of the acting function. A person coming from the ranks of permanently employed civil servants, who meets the legally defined conditions for work in the vacant position, may be appointed as an acting manager (article 67a CSL). There is no provision on automatic appointment in case of a failure to conduct the competition process: the position remains vacant until the appointment of a civil servant based on the competitive procedure.</p>
<p>18. The Government should urgently cease the practice of appointing and reappointing acting managers and start making appointments of SCS in accordance with the legal provisions.</p>	<p>No action taken</p>	<p>Senior civil servants revealed in the interview that in practice it does happen that acting senior managers stay in acting position often much longer than it is prescribed by the law. Monitoring found cases where the same individuals would be reappointed to the acting position status, as well as instances where the same individuals were rotated from one acting position (in one institution) to another, whose job descriptions were not necessarily related.</p>
<p>19. Appointments of SCS should be exempt from the competence of the Government Personnel Commission and the appointment proposals by heads of administrative bodies for filling in the SCS vacancy should be sent directly to the government sessions for approval.</p>	<p>No action taken</p>	<p>There has been no change since the baseline PAR Monitor. The provision of the Government Rules of Procedure remains the same: The Personnel Commission proposes to the Government nominations, appointments, and dismissals within the competence of the Government.</p>
<p>20. 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.</p>	<p>No action taken</p>	<p>Job announcements do not contain any salary-related information.</p>
<p>21. 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>No remuneration information for civil servants is found on the either of the two websites. There is only general information on salary levels.</p>
<p>22. 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 homepage of these institutions.</p>	<p>No action taken</p>	<p>No remuneration information for civil servants is found on the either of the two websites. There is only general information on salary levels.</p>
<p>23. 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>N/A</p>	<p>There is not enough evidence to fully determine the status of this recommendation. NAPA's general training programme for civil servants for 2019 and 2020 included the training on whistle blower protection as part of the professional development area Prevention and Fight Against Corruption. In 2019, a total of 23 trainees participated in two trainings within this area, one of which was the training on whistle blower protection. This means that maximum 23 people in the entire state administration went through the whistle blower protection training in 2019. In 2020, one training with 77 participants was delivered within the anti-corruption professional development area, but there is no evidence that the training related to the whistle blower protection.</p>

184 NAPA, Report on training evaluation 2019, available at: <https://bit.ly/2UaLVpf> (last accessed on 10 June 2021).

185 NAPA, Report on training evaluation 2020, available at: <https://bit.ly/3hriZ49> (last accessed on 10 June 2021).

PAR MONITOR 2019/2020 RECOMMENDATIONS

Most of the recommendations from the 2017/2018 PAR Monitor are still relevant, and therefore majority of them is repeated. Some of the recommendations which are repeated have been slightly modified to correspond to the current state of play or provide more clarity and specificity.

Repeated and modified recommendations from PAR Monitor 2017/2018

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.
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).
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.
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 depoliticization.
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.
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.
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.
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.
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.

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.
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. The legislation should allow the acting managers to automatically be appointed as senior civil servants if the body fails to successfully conduct a competition process within the legally prescribed timeframe.
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.
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.
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.
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.

New recommendations 2019/2020

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.
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.
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.
19. The institutions advertising vacancies should introduce search engines on their respective webpages for filtering vacancy announcements according to multiple criteria.
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.
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.

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 2018

Main developments converge around the pending legal changes to the free access to information (FOI) act in Serbia, as described in the baseline PAR Monitor 2017/2018.¹⁸⁶ The MPALSG's renewed initiative to amend the *Law on Free Access to Information* was launched in 2018, but the lengthy process of amendments, featured by the great interest among all stakeholders, resulted in no adopted amendments in 2019. Contributing to this was the significantly delayed procedure of selecting the new Commissioner for Free Access to Information of Public Importance and Personal Data Protection (the Commissioner), eventually elected in July 2019.

As mentioned in the previous PAR Monitor, the scope and direction of proposed changes provoked concerns within the public especially on the issue of potential exemption of equity-based companies, partly funded or managed by the state, from the legal scope. Public debate report, published by the MPALSG in 2018, saw comments grouped by topics due to their multitude and stating they will be considered in detail,¹⁸⁷ however no closer information on handling the received comments has been published since.

The MPLASG, finally, in November 2019 informed the public on the ensuing work following the public debate held a year and a half before. This information recapitulated on the consultation process with civil society and public debate, on opinion exchange with administration bodies, and on opinions stated by SIGMA on behalf of the European Commission. The same announcement contains an overview of amended provisions, as the result of consultations.¹⁸⁸

In 2020, the COVID-19 pandemic outbreak and the parliamentary elections, including the formation of the new government, additionally delayed this already prolonged process.¹⁸⁹ Nevertheless, the European Commission's report from October 2020 speaks of additional efforts for reaching a closure of the process of law changes, by stating that draft legal amendments "included provisions limiting access to information of public interest related to equity-based companies with shares owned by the state. While it would be legitimate to ensure the equal position of all companies (companies that are entirely privately funded and companies with shares owned by the state), the drafting of such provisions would leave a loophole to arbitrarily deny requests for access to information of public interest."¹⁹⁰ Finally, after the additional work on the amendments to the FOI law in 2019 and 2020, and after including the Commissioner in the working group tasked with the amendments,¹⁹¹ the MPALSG has announced in May 2021 a new public debate on draft amendments that is supposed to last until 16 June of the same year.

186 See *National PAR Monitor Serbia 2017/2018*, available at: <https://www.par-monitor.org/par-monitor-reports-2017-2018/>. The adoption of the FOI law amendment is also the obligation of Serbia under the Action Plan for the Chapter 23 of the EU accession process. In one of the previous versions of this AP, law amendments were planned for 2016, whereas its revised version sets final quarter of 2020 as the deadline. Both version of the Action Plan available at: <https://bit.ly/3grOfks> (old), and <https://bit.ly/3cKEBqU> (revised, last accessed on 1 June 2021).

187 Public debate report, available at: <https://bit.ly/2IN7OWd> (last accessed on 17 November 2020).

188 Ministry of Public Administration and Local Self-Government, available at: <https://bit.ly/3fb2gR9> (last accessed on 17 November 2020).

189 MPALSG decided to wait for the new Government to decide on proposals for new amendments and the draft's approval. Meeting notes from the working group of the Open Government Partnership, available at: <https://bit.ly/3gw3bxK> (last accessed on 17 November 2020).

190 European Commission, Serbia 2020 Report, p.29, available at https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/serbia_report_2020.pdf (last accessed on 17 November 2020).

191 Ministry of Public Administration and Local Self-Government, available at: <https://bit.ly/3xqHR7r> (last accessed on 1 June 2021).

During the state of emergency imposed due to COVID-19 pandemic outbreak, the Serbian Government adopted the regulation altering the deadlines in administrative procedures which meant delaying any crisis-unrelated free access to information requests as well.¹⁹² According to civil society sources, many public authorities interpreted the Commissioner's approval of the adoption of such regulation, as a possibility not to respond to any free access to information request during the state of emergency.¹⁹³

Slightly overshadowed by the importance of scope of the law amendments, and position and jurisdiction of the Commissioner, topic of proactive informing of the public was also integral part of ongoing legal changes. Apart from restating obligation of the public authorities to publish information booklets as a tool for proactive informing, proposed amendments spelled out the need to publish these booklets in electronic and open data (machine readable) format on a single information system built for that purpose. Still, there are no major changes since the last PAR Monitor, given that the opening of the information booklets entirely depends on the key milestone which is the adoption of law amendments.¹⁹⁴ Nonetheless, there are small-scale advancements. With the external project support, the application for electronic information booklets was designed and piloted in a few local self-government units, which helped to raise awareness and build capacities of local civil servants, as well as to test the information system.¹⁹⁵ Although not officially in use yet, it is available from the website of the Commissioner.¹⁹⁶ Finally, in December 2018, the Government adopted regulation that defines more closely standards for creating and updating web presentation of public authorities at all levels.¹⁹⁷ Regulation includes provision on accuracy and completeness of webpages, presentation of services provided by authorities, accessibility and visibility aspects, navigation, security and other elements of importance for development of webpages.

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, yet this principle looks at both the proactive and reactive sides of the issue.

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

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

WeBER'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 Western Balkan was implemented using an online surveying platform from the second half of June to the

192 Regulation on the application of deadlines in administrative procedures during state of emergency, Official Gazette No. 41/20, 43/20, available at: <https://bit.ly/3f5jj7l> (last accessed on 17 November 2020).

193 See: Lawyer's Committee of Human Rights, *Human Rights and COVID-19*, 2020, available at: <https://bit.ly/3wq73Gh> (last accessed on 1 June 2021).

194 Milena Lazarević, Dragana Bajić, *Independent Reporting Mechanism (IRM): Serbia End-of-Term Report 2016–2018*, p. 26, <https://bit.ly/3lEUth1> (last accessed on 17 November 2020).

195 Ibid, p. 26-27.

196 E-information booklets portal, available at: <https://informatior.poverenik.rs/naslovna> (last accessed on 1 December 2020).

197 Regulation on Closer Conditions for Creation and Maintenance of Web Presentation of Authorities, Official Gazette No. 104/2018, available at: <https://bit.ly/3d4E2sf> (last accessed on 1 June 2021).

beginning of August 2020.¹⁹⁸ The uniform questionnaire with 28 questions 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 targeted as many organisations as possible in terms of types, geographical distributions, and activity areas, and hence contributed a representative sample, additional boosting was done where increases to overall responses were needed. Finally, a focus group with CSOs was organised to complement survey findings with qualitative data. Focus group results were not, however, used for point allocation for the indicator.

The second indicator focuses on proactive informing of the public by administration bodies, particularly by monitoring the comprehensiveness, timeliness, and clarity of the information disseminated through official websites. In total, 18 pieces of information were selected and assessed against two groups of criteria: 1) basic criteria, looking at the information's completeness, and whether it was up to date, and 2) advanced criteria, looking at the accessibility and citizen-friendliness of the information.¹⁹⁹ 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.

198 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 23 June to 24 July 2020. The data collection method included CASI (computer-assisted self-interviewing). The survey sample was N=184.

199 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

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

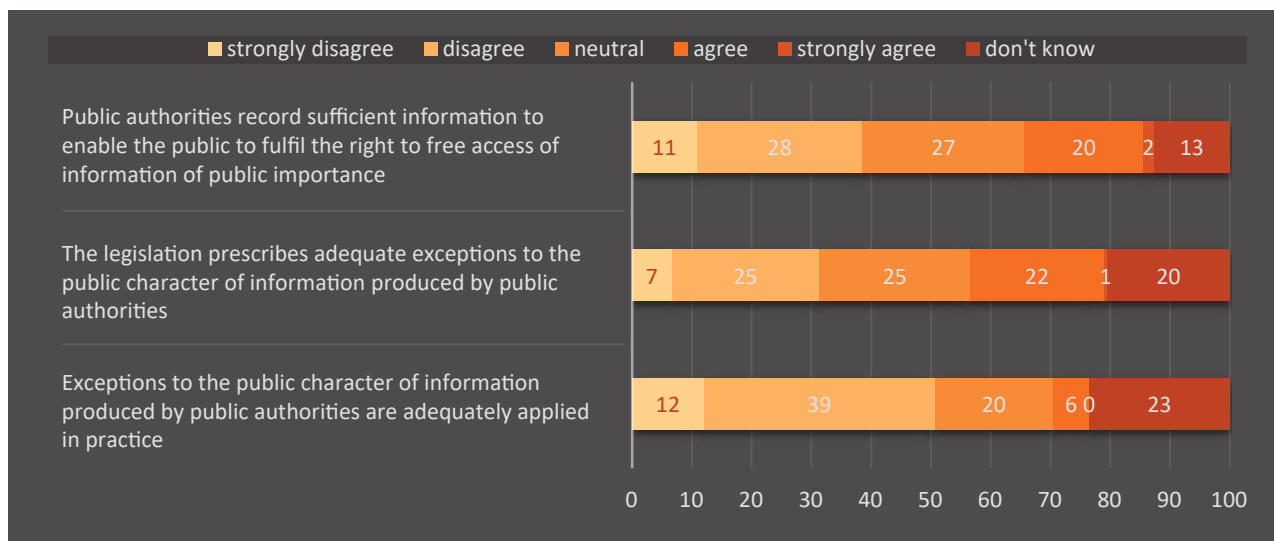
Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 CSOs consider that the information recorded and documented by public authorities is sufficient for the proper application of the right to access public information	0/4	0/4
E.2 CSOs consider exceptions to the presumption of public character of information to be adequately defined	0/2	0/2
E.3 CSOs consider exceptions to the presumption of public character of information to be adequately applied	0/4	0/4
E.4 CSOs confirm that information is provided in the requested format	1/2	1/2
E.5 CSOs confirm that information is provided within prescribed deadlines	1/2	1/2
E.6 CSOs confirm that information is provided free of charge	2/2	2/2
E.7 CSOs confirm that the person requesting access is not obliged to provide reasons for requests for public information	1/2	1/2
E.8 CSOs confirm that in practice the non-classified portions of otherwise classified materials are released	0/4	0/4
E.9 CSOs consider that requested information is released without portions containing personal data	1/2	1/2
E.10 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
E.11 CSOs consider that the designated supervisory body has through its practice, set sufficiently high standards of the right to access public information	2/4	4/4
E.12 CSOs consider the soft measures issued by the supervisory authority to public authorities to be effective	0/2	1/2
E.13 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
Total score	8/34	11/34
Indicator value (scale 0 – 5)²⁰⁰	1	1

CSOs in Serbia still report considerable issues in terms of possibility to exercise the right to free access to information. More precisely, less than a quarter (22-23%) of respondents expressed a positive view on preconditions for using this right to the fullest, i.e. whether authorities record sufficient information or if legislation prescribes adequate exceptions to the public character of information. Perceptions are as low as 6% when it comes to whether exceptions to the presumption of the public character of information are properly applied in practice. Considering that the CSO are among the top users of this right, their views on obstacles in getting access in practice carry considerable weight.²⁰¹

200 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.

201 In 2019, 69% of complaints received by the Commissioner were sent by citizens individually, followed by 12.7% sent by CSOs. Journalists and media representatives came third with the share of 7.5% of all complaints. Annual Report on the implementation of the Law on Free Access to Information of Public Importance and the Law on Personal Data Protection, p. 39, available at: <https://bit.ly/37Gaj6z> (accessed on 22 December 2020).

Chart 13. Based on the experience of your organization with exercising the right to free access of information, please indicate your level of agreement (%)



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=166 respondents.

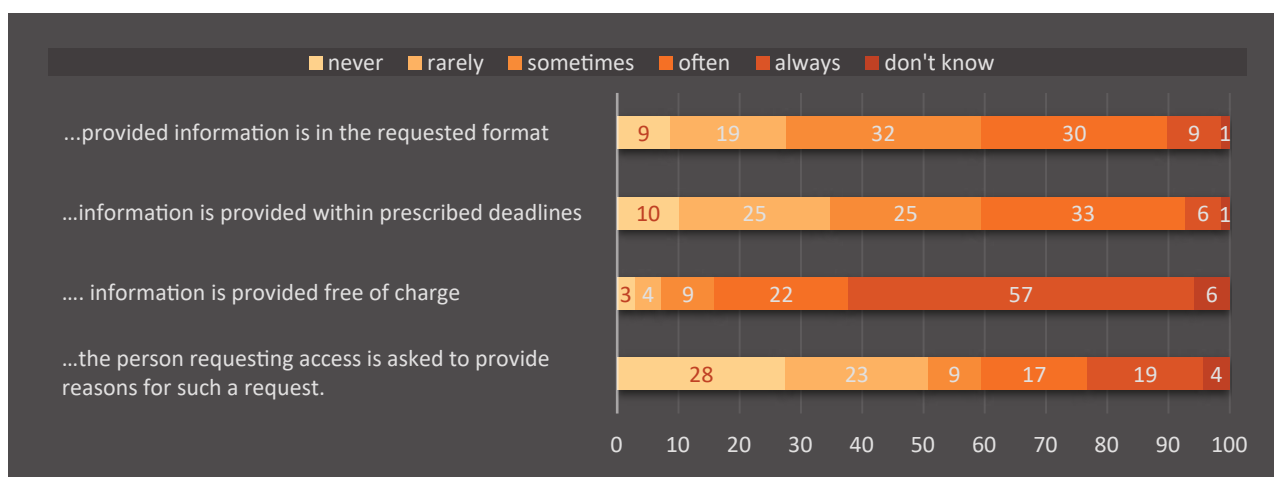
Individual testimonies of CSO representatives reveal close connection between general perceptions and CSOs' experience with institutions to whom they frequently pose information requests.²⁰² Examples of issues in practice include incomplete, poorly elaborate, or even binary responses (yes/no) when the request asked for more substantiated data. Based on the CSO experience, certain ministries often inform they need to seek approval from political instance to allow access (as is the case with the Ministry of Internal Affairs), and others are almost entirely irresponsive (Ministry of Finance and its subordinate bodies). Although legislation allows authorities to deny access to information based on unreasonable, repetitive, or burdensome requests, CSOs still report misuse of this legal excuse even when it is not the case. Lastly, certain pieces of information are as a rule not available, most prominently minutes or reports from parliamentary committees and governmental sessions. On the other hand, lower levels of government also feature said deficiencies or inconsistencies. For instance, CSOs opine local authorities have started to respond more frequently, but not only do official responses sometimes suffer from incompleteness or imprecision, they can be even unaware of the existence of requested documents.

Surveyed CSOs that have sent requests in the last two years have somewhat more positive stance towards specific technical, but significant details for receiving desired information. Approximately 78% say that information is provided free of charge, often or always. Additionally, there is moderate level of confirmation (more than one third but still less than one half) that information is often or always provided in the requested format, and within prescribed deadlines. Although half of respondents (51%) indicated that they were rarely or never asked for reasons behind the requested information, a significant share (45%) pointed that it has still happened sometimes, often, or always. Results therefore suggest a fair chance that that person who requests information will be asked to provide reasons, contrary to the Law on Free Access to Information.²⁰³ Based on perceptions only, these aspects remain least disputable within the civil society, despite slight downward trend since the baseline 2017/2018 report.

202 Focus group with civil society organisations held on 15 October 2020.

203 Article 15, Law on Free Access to Information of Public Importance, Official Gazette No. 120/2004, 54/2007, 104/2009, 36/2010, stipulates that the information seeker may not indicate reasons for the request.

Chart 14. When my organization requests free access to information... (%)

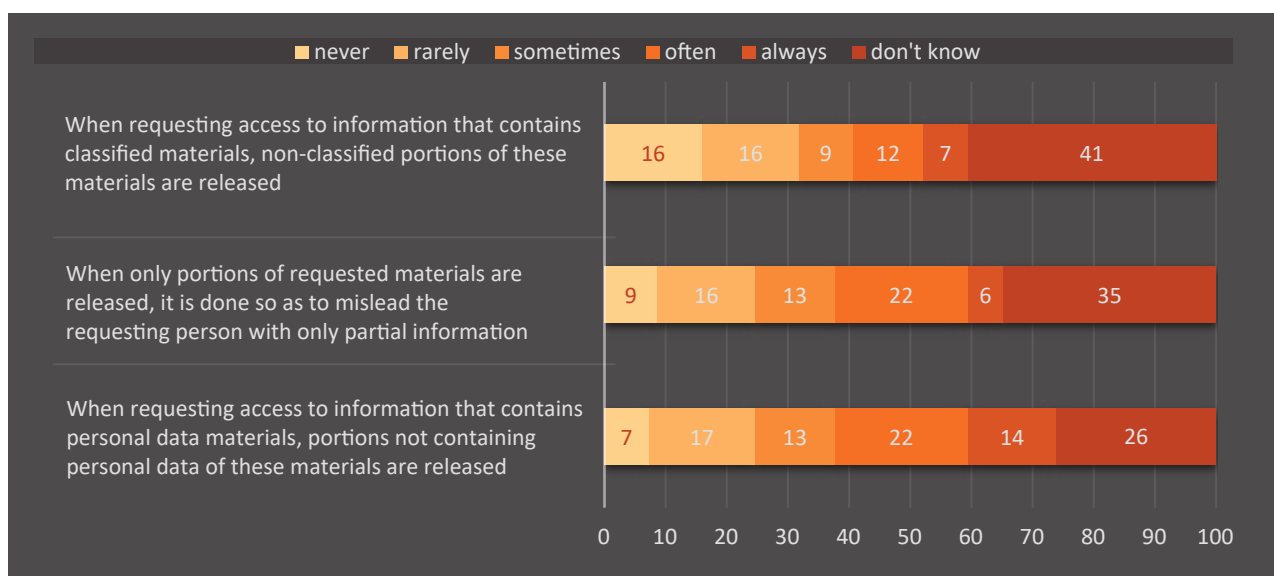


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

On the other hand, CSO's views tell that the requesting information that can contain classified or personal data is still an unknown, as in the baseline PAR Monitor. There is a low share of responses confirming that 1) non-classified parts of information are often or always released, and 2) that these parts are not released in a misleading manner. This is once again coupled with "don't know" as single most frequent response. Though the number of "don't knows" has declined compared to the baseline PAR Monitor, sometimes even tellingly (6 and 12 percentage points respectively), it still goes above one third. This finding could speak of how still insufficiently informed civil society is on these matters or that such requests are rare in practice.

When CSOs were asked whether portions containing non-personal data are released in practice, in case they request for information that contain personal data materials, the frequency of "don't know" responses showed the greatest turn - from 44% in the baseline monitoring, to 26% in this edition. Still, share of those who consider personal data parts are removed (often or always) is slightly more than a third, and it remains almost unchanged compared to 2017/2018 cycle.

Chart 15. Civil society perception on accessing information containing classified or personal data (%)

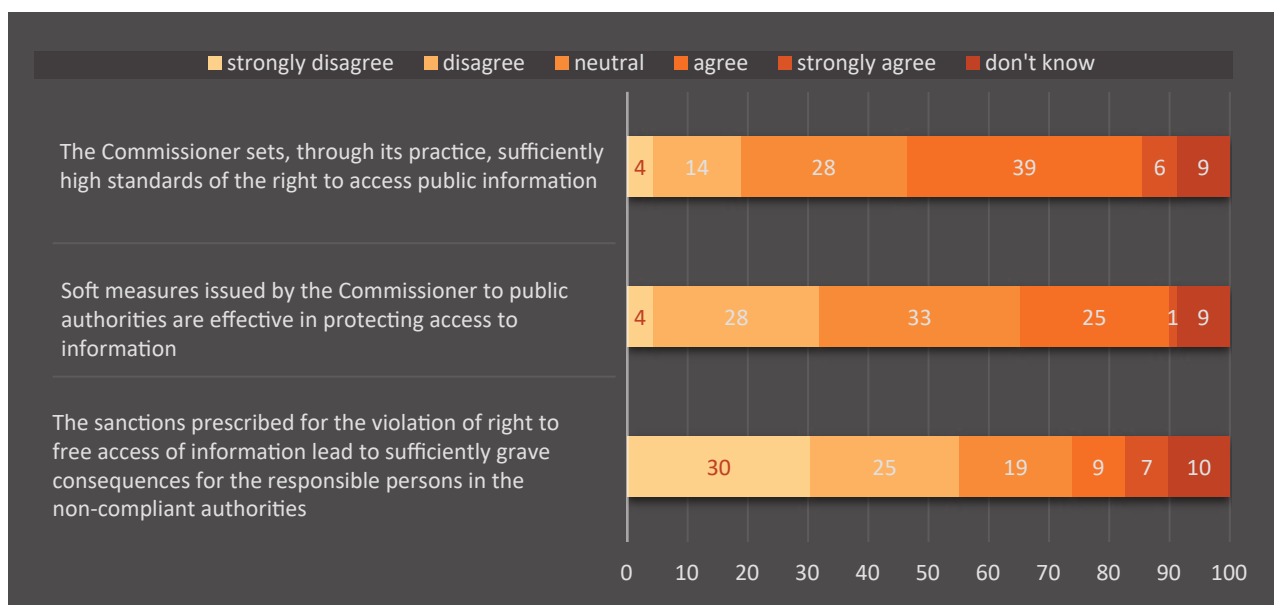


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

Focus group discussion shows that resorting to confidentiality and personal data protection as arguments for non-disclosure is well spread in certain areas of CSO's interest.²⁰⁴ This can go together with disagreement between the requesting CSO and the responsible authority on whether the subject of the request is in fact business secret, or other type of confidential data. Cases in point are requests which sought number of disciplinary procedures or other information relevant from the angle of suspicion of corruption. Authorities can go at length in their responses citing the legal basis for restricting free access to information on these. While restriction of this right applies to information and documents that are legally kept as state, official, business, or other secret,²⁰⁵ CSOs believe such reasons are at times pulled unjustifiably.

Finally, there has been a downward shift in perception of the Commissioner's work, when compared to the PAR Monitor for 2017/2018. CSOs' opinions about the Commissioner's ability to safeguard the right to access information in practice is limited. There is a moderate level of agreement among CSOs (45% of responses "agree" and "strongly agree") that the standards set by the Commissioner are sufficiently high to protect free access to information. However, this represents a drop of 15 percentage points vis a vis baseline monitoring, when 3 out of 5 surveyed CSO representatives believed this was the case. The drop is even sharper considering Commissioner's soft measures, as around a quarter of respondents agreed that such measures are effective, making a drop of 35 percentage points. Together with significantly less approving perception of the Commissioner's ability to impose efficient sanctions that would lead to meaningful consequences to non-complying authorities (roughly 16%), perceptions of the potency of the Commissioner's measures are quite compelling. The relatively high share of neutral responses on these issues, that can amount up to a one-third, only adds to generally unfavourable CSO's impressions on the position of the Commissioner.

Chart 16. Civil society perception on the effectiveness of the Commissioner's supervisory role (%)

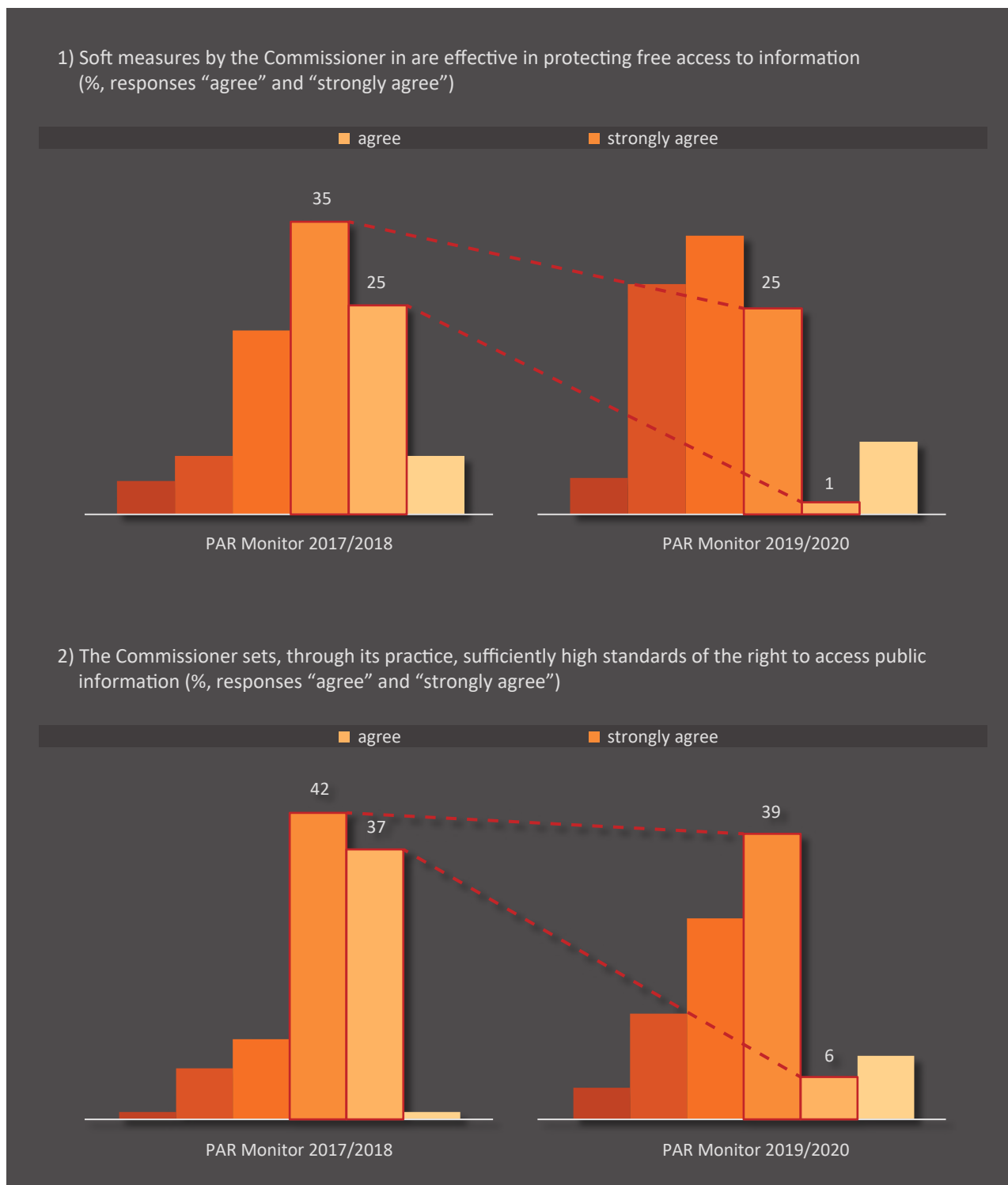


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=69 respondents.

204 Focus group with civil society organisations held on 15 October 2020.

205 Article 9, Law on Free Access to Information of Public Importance.

Chart 17. Comparison of CSO's perception, in the 2017/2018 and the 2019/2020 monitoring cycle, on following statements:



It is noteworthy that the focus group discussion goes hand in hand with perceptions on the Commissioner's limited authority over the non-complying bodies.²⁰⁶ CSO's often experience that decision of the Commissioner are not followed. They also state that the public authorities at times do respond after procedures before the Commissioner are formally initiated but before the Commissioner issues the decision, which is indicative of late, and under-the-pressure responsiveness. Focus group also informs that even in cases when the Commissioner's decisions are complied with, responses can be still incomplete or not in line with the initial request. Finally,

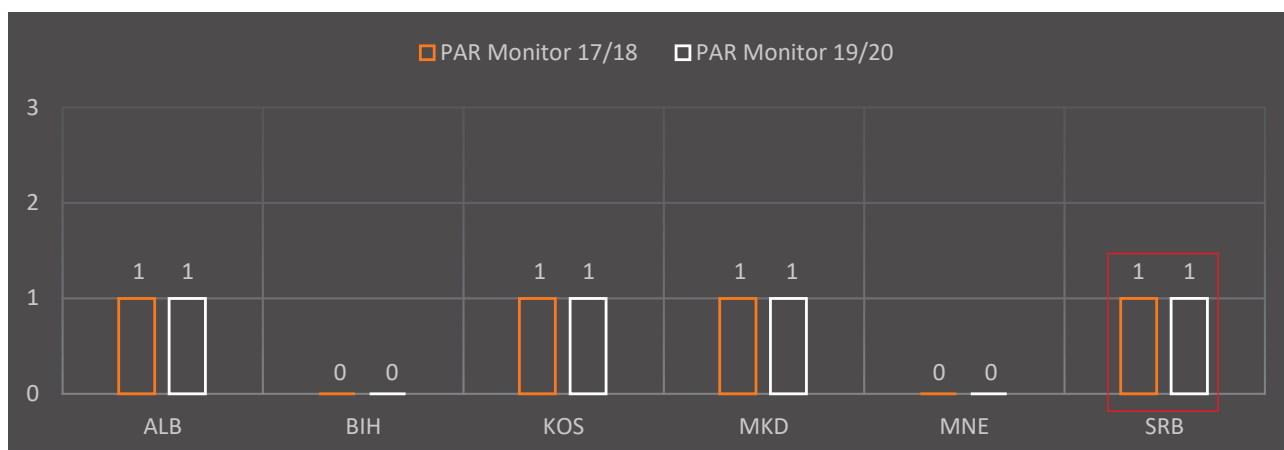
²⁰⁶ Focus group with civil society organisations held on 15 October 2020.

matching with the baseline PAR Monitor, CSOs are often obliged to act proactively and contact authorities instead of waiting for them to respond or neglect the request. Such experiences reveal that getting access to information in Serbia entails at times both formal as well as informal ways.

Overall, compared to the baseline PAR Monitor, a major difference is visible in civil society's view on sufficiency of standards set by the Commissioner for protecting free access to information. Whereas previously roughly 80% of respondents agreed that it sets high standards, the extent of agreement has nearly halved this time (45%). This can be placed in the context of the expiry of the mandate of the previous Commissioner and election of a new one in 2019. In the similar vein, perception of the effectiveness of the Commissioner's soft measures has also dropped considerably. From roughly 60% of respondents agreeing these measures were effective, to only about one quarter in this PAR Monitor. However, despite these highlighted drops in perceptions, the indicator value achieved for Serbia in the baseline PAR Monitor did not change.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 14: Indicator ACC_P2_I1: Civil society perception of the quality of legislation and practice of access to public information



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

WeBER indicator ACC_P2_I2: Proactive informing of the public, by public authorities²⁰⁷

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Websites of public authorities contain complete and up to date information on scope of work	4/4	4/4
E.2 Websites of public authorities contain easily accessible and citizen-friendly information on scope of work	0/2	1/2
E.3 Websites of public authorities contain complete and up to date information on accountability (who they are responsible to)	4/4	4/4
E.4 Websites of public authorities contain complete and up to date information on relevant policy documents and legal acts	0/4	4/4
E.5 Websites of public authorities contain accessible and citizen friendly information on relevant policy documents and legal acts	0/2	1/2
E.6 Websites of public authorities contain complete and up to date information on policy papers, studies and analyses relevant to policies under competence	0/4	2/4
E.7 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
E.8 Websites of public authorities contain complete and up to date annual reports	0/4	0/4
E.9 Websites of public authorities contain accessible and citizen friendly annual reports	0/2	0/2
E.10 Websites of public authorities contain complete and up to date information on the institution's budget	2/4	4/4
E.11 Websites of public authorities contain accessible and citizen-friendly information on the institution's budget	0/2	0/2
E.12 Websites of public authorities contain complete and up to date contact information	2/4	4/4
E.13 Websites of public authorities contain accessible and citizen friendly contact information	2/2	2/2
E.14 Websites of public authorities contain complete and up to date organisational charts which include entire organisational structure	2/4	4/4
E.15 Websites of public authorities contain accessible and citizen friendly organisational charts which include entire organisational structure	2/2	2/2
E.16 Websites of public authorities contain complete and up to date information on contact points for cooperation with civil society and other stakeholders, including public consultation processes	2/4	0/4
E.17 Websites of public authorities contain accessible and citizen friendly information on ways in which they cooperate with civil society and other external stakeholders, including public consultation processes	1/2	0/2
E.18 Public authorities proactively pursue open data policy	0/4	0/4
Total score	23/56	32/56
Indicator value (scale 0 – 5)¹⁶⁰	2	3

The findings for this indicator reflect the state of play from the period February-March 2020, when the actual review of websites took place in this PAR Monitor cycle. Analyses for this indicator relies solely on a sample of seven state administration authorities (table x). All elements under this indicator, except for elements 3 and 18, are assessed against four criteria – completeness of information provided online, how updated information is, accessibility of information measured by the number of clicks it takes to access it, as well as its citizen friendliness.

207 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.

Table 6. Sample of state administration authorities in Serbia for 2019/2020 monitoring cycle

Line ministry (large)	Line ministry (medium)	Line ministry (small)	Ministry (horizontal)	CoG body	Subordinate body	Service delivery body
Ministry for Labour, Employment, Veteran and Social Affairs	Ministry of Public Administration and Local Self-Government	Ministry of Culture and Media	Ministry of European Integration	General Secretariat of the Government	Environmental Protection Agency	Tax Administration

Overall, all sample authorities' scope-of-work descriptions matched the latest legislation and were updated and easily accessible. However, all but one public authority had copied information verbatim from relevant legal texts, and only MPALSG did stand out in this regard as it managed to summarise its scope of work in a way that resonates with the public.²⁰⁸ When it came to information on accountability, all authorities managed to provide reference of who they were responsible to correctly with information booklets being the key source.²⁰⁹

Public authorities also listed up-to-date policy documents and laws that they apply, which are easy to access on their websites. However, lists of these documents were once again not presented in a way that would allow for citizen friendly review as public authorities did not briefly introduce those policy documents and legal acts with simply worded introductions.

Still, there were fewer sample authorities who were proactively publishing complete and up-to-date policy papers, studies, and other analytics from their purview (43% of the sample), with only the Ministry for European Integration (MEI), MPALSG and the Environmental Protection Agency (SEPA) more regularly doing so. In the case of SEPA, besides multiple analysis published in recent years, website contains reports with regularly and frequently published data from the SEPA's competence, for instance, daily water quality reports.²¹⁰ In the case of MEI, website offers up-to-date monthly media analysis reports on Serbia's EU accession process, and public opinion poll results twice a year on perceptions of EU and related reforms (at the time of writing this report last opinion poll results dated from December 2019).²¹¹ At the same time, for these three state administration authorities, analytical publications were mostly citizen friendly as they were relatively simply introduced and free from bureaucratic jargon and also accessible online with minimum effort. Nonetheless, this represented a large drop in available analytical documents and data when compared to sample authorities from the baseline PAR Monitor 2017/2018, when all but one observed state administration authority produced similar publications.

On the other hand, authorities continue without reporting on their work. Publishing of annual reports on the work of sample authorities was as inexistent in this monitoring cycle as it was in baseline PAR Monitor. The General Secretariat of the Government (GSG) did issue accessible, last available annual report at the time of monitoring in 2020, but on the implementation on the GAWP as the GSG is responsible for compiling it. Reports on GAWP implementation do contain description of activities of state administration bodies, special organisations, and government services, however they cover the Government's work in entirety and are deemed insufficient according to the PAR Monitor methodology for assessing regularity of reporting, as it covers whole of government. That said, accessibility and citizen friendliness of annual reports on authorities' work could not be assessed in this monitoring cycle again due to general absence of annual reporting.

Sample authorities were more rigorous when it came to annual financial reports and plans, with only MEI not releasing financial plans for 2020 (6 out of 7 sample authorities proactively disclosed financial plans for the ongoing year, and a last available financial report within legal deadlines). Only MPALSG managed to disclose their annual financial plan in a citizen friendly way. In similar fashion to baseline PAR Monitor, all other authorities have solely listed their basic budgets, or execution reports, on their websites or as part of the information booklets available online, as opposed to a simpler summary. MPALSG stood alone in succinctly explaining it

208 Ministry of Public Administration and Local Self-Government, available at: <http://mduls.gov.rs/o-ministarstvu/> (last accessed on 18 May 2021).

209 Information booklets are legally obligatory for all public authorities, according to the Law on Free Access to Information of Public Importance and have a strictly defined structure.

210 Serbian Environmental Protection Agency, available at: <http://www.sepa.gov.rs/index.php?menu=5000&id=1304&akcija=showDocuments> (last accessed on 18 May 2021).

211 Ministry of European Integration, available at: <https://www.mei.gov.rs/srp/informacije/javno-mnjenje/> (last accessed on 18 May 2021).

on its website, via a single sentence, the amount of money it had to spend in 2020.²¹² Recycling the practice identified in 2017/2018 monitoring cycle, information booklets were once more large information sources as sampled authorities mostly used them to present basic budget plans and reports, which is a mandatory requirement pursuant to the FOI law, although some have published it additionally on another website location.²¹³

Sample authorities have advertised their contact data online in a complete, accessible and citizen-friendly way. Websites generally had contact sections on their websites displaying relevant details (physical locations, generic telephone numbers and emails), with once again information booklets being relevant source of additional contact information, especially for internal units. Atypically to the rest of the sample, the GSG did not have a contact section on its website, but only contact numbers for certain units. The GSG website was noteworthy in its inconsistency though, as there were discrepancies between its Cyrillic and Latin alphabet versions. For instance, in terms of information availability, the February 2020 information booklet was only available on the former and two different, outdated information booklets on the latter.

Organisational charts of sampled authorities, for the most part, were complete and up-to-date, simply laid out, and accessible from the websites' homepages in a few clicks.²¹⁴ Similarly, sample authorities were largely proactive in disclosing complete and up-to-date contact points for cooperation with civil society and other external stakeholders, except for GSG and SEPA. As general contacts for cooperation purpose were mostly absent, sample authorities managed to provide specific contact information for individual public consultation invitations and more than half of them demonstrated citizen-friendly approaches in inviting those interested, or specific stakeholders, to participate. It is noteworthy that the former Office for Cooperation with Civil Society (now part of Ministry for Human and Minority Rights and Social Dialogue) initiated, at the end of 2019, creation of database of contact points for cooperation with CSOs, which currently consists of 191 appointed individuals by 140 bodies (including 23 state administration bodies).²¹⁵

Lastly, many of the sampled authorities did not publish any relevant open data information. Only three of them disclosed at least a single open dataset, and SEPA provided links to governmental open data portal.²¹⁶ It should be noted that the Ministry of Culture and Media (MCM) had a plethora of open data sources on the open data portal of the Government, and from MCM's website there is a link to the national open data portal too.²¹⁷

Compared to the baseline PAR Monitor, which covered a different sample of institutions, lower total score and final indicator value for Serbia mean that the practice of publishing information proactively is uneven among state administration bodies. There is no firm standard for any of the four criteria used by WeBER in measuring proactive information provision. Also, a certain number of authorities had their webpages streamlined from 2019 on making them more user-oriented and coherent, and it remains to be seen whether this approach will be followed through in the rest of the administration. Since the baseline PAR Monitor no progress has been recorded when it comes to spotlighted issues from the first monitoring cycle, such as publishing of annual work reports. Additionally, sampled authorities were found to have published less policy analyses and studies than those monitored in 2017/2018. In general, underperformance in proactive information provision was in large part due to the complete absence of certain types of information as well as lack of citizen friendly presentations of information available online.

212 Available at: <http://mduls.gov.rs/javnost-u-radu/budzet-ministarstva/> (last accessed on 18 May 2021).

213 On a different note, local self-government units in Serbia have recently started releasing open data on budget plans and expenditures through the portal <https://budzeti.data.gov.rs/>.

214 According to the PAR Monitor methodology, assessments are dependent on comparison of organisational charts with the latest acts on internal organisation and job systematisation. In some cases, FOI requests were sent to obtain latest act (to whom only GSG did not answer).

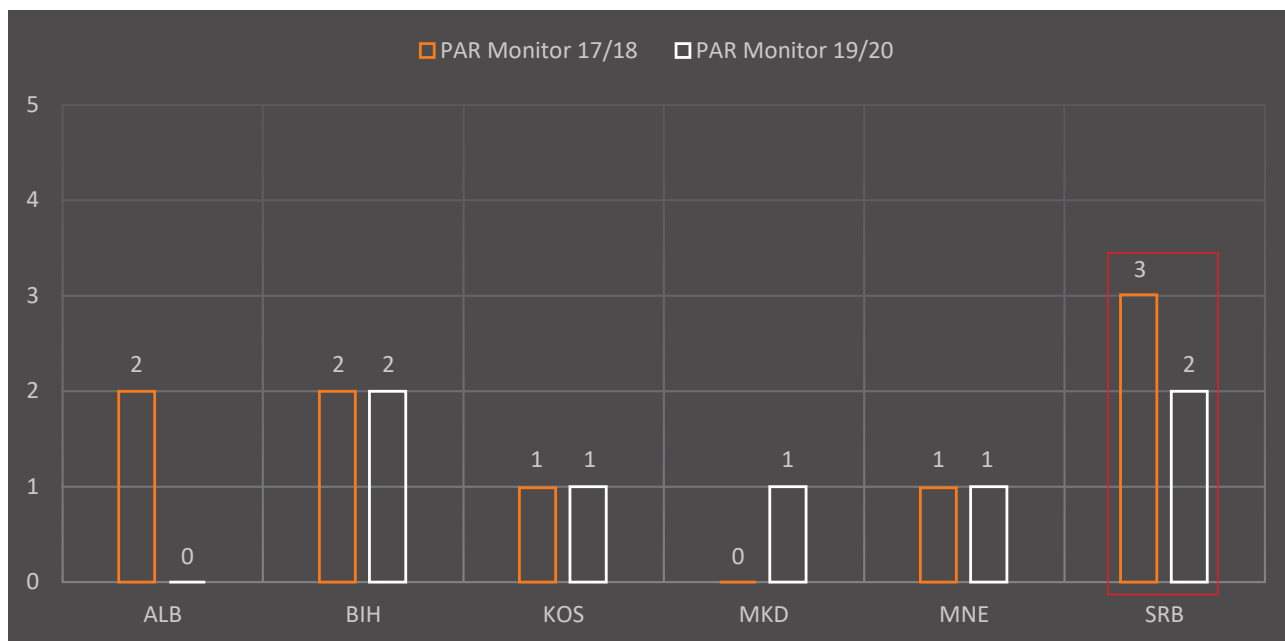
215 Available at: <https://bit.ly/2TF7g9V> (last accessed 18 May 2021).

216 According to the PAR Monitor methodology, to award points under this element, it is monitored if each sample authority has published at least one open dataset pertaining to the competence of the institution, and one dataset relevant from the FOI aspect (such as employees lists, state officers and data on their salaries, rulebook on internal organisation, public procurement plan, financial plan etc.). Methodology also requires that if datasets are published on the national open data portal, there must be a reference or link on websites of public authorities.

217 Datasets of the Ministry of Culture and Media and at the Open Data portal: <https://data.gov.rs/sr/organizations/ministarstvo-kulture-i-informisanja/> (last accessed on 19 May 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 15: Indicator ACC_P2_I2: Proactive informing of the public, by public authorities



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

V.5 SUMMARY OF RESULTS IN THE ACCOUNTABILITY AREA

In the accountability area, perceptions of CSOs in Serbia on the implementation and enforcement of the FOI right have marked a notable change in relation to the work of the Commissioner for Information of Public Importance and Personal Data Protection. In this cycle there was 45% of agreement among CSOs that the Commissioner sets high standards for FOI rights protection, compared to 60% of CSOs in the baseline PAR Monitor. Moreover, CSOs were far more reluctant to assess Commissioner's soft measures as effective with just around a quarter of agreement and 35 percentage points down looking back to the baseline PAR Monitor. At the same time, the Commissioner's ability to impose sanctions remains perceived as quite ineffective in practice.

In this monitoring cycle, slightly fewer share of respondents than in the baseline one believes there are basic preconditions for FOI, in the sense that authorities record sufficient information in their work, and that exceptions to the public character of information are adequately defined in legislation – just below 25% of agreement for both. However, when asked whether these exceptions are adequately applied in practice, the agreement is negligibly low at 6%, going even lower than in 2017/2018 cycle (10%). As in the baseline PAR Monitor, CSOs who have practiced FOI requests are more approving on technical details which remain least contested – 78% confirm requested information is provided free of charge, but just over a half informs they are not asked to disclose reasons for requests. Somewhat lower share of respondents (39%) believe they receive information within legal deadlines, and in requested format, 5 percentage points down than in the last monitoring cycle.

CSO's views on handling of requests for information that can contain classified or personal data tell that they still have little experience with such requests, as in the 2017/2018 cycle. Overall, there is a low share of CSOs who confirm that non-classified parts are often or always released, and that they are never or rarely released to mislead a requesting person. Share of "do not know" responses amount to a one third and, despite some decline it remains the most frequently selected option.

On the provision of information proactively by public authorities, deficiencies from the baseline PAR Monitor, such as lack of efforts to present information in an approachable, citizen friendly fashion, or the lack of specific categories of information - annual work reports and citizen-friendly budgets, remain widely spread within sample authorities. On the other hand, information on scope of work, policy and legal documents, accountability lines, organisational charts or contact information remain the most complete and up to date across the sample, as in the previous cycle. Still, availability of policy papers and analysis is far less available this time around, with MEI, MPALSG and SEPA being the positive exceptions. Public authorities mostly disclose budgetary information in the similar vein as in 2017/2018 cycle – by providing basic budget plans and execution data on their websites or as part of the information booklets available online. In the entire sample of seven central administration authorities observed, MPALSG is singled out in a few cases for its citizen friendly approach - for presenting its budget plan amount for 2020, and for summarising its scope of work free of unnecessary bureaucratic jargon to the extent possible. When it comes to contacts for cooperation with civil society and other external stakeholders, sample authorities were largely proactive in disclosing complete and up-to-date contact points, except for GSG and SEPA. Finally, as only slight improvement since the baseline monitoring, three sample authorities disclosed at least a single open dataset online, with SEPA and MCM providing links to the governmental open data portal.

V.6 RECOMMENDATIONS FOR PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2018

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
<p>1. Public authorities should inform by using simple, citizen-oriented language on their websites, focusing on ease of access and better user experience. In particular:</p> <p>a. When publishing documents (policy and legal documents, reports, etc.), their content and purpose need to be briefly introduced or explained 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.</p> <p>b. 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), the copy-paste of text from statutory acts should be strictly avoided, but tailored to an average citizen.</p>	Initiated	The practices if public authorities remain uneven. In the observed sample from this PAR Monitor, the MEI, MPALSG and SEPA have published in certain cases posts and analytical documents that are considered citizen friendly - simply introduced, and easily accessible. On the other hand, scope of work and competences are usually taken verbatim from legislation. For the reasons of highly uneven practices and no common standards, recommendation is marked as initiated rather than partially implemented. Also, websites of state administration bodies were undergoing reconstruction and are, in some cases, being aligned with the design and structure of the Government's portal. ²¹⁸
2. Public authorities at the state administration level should proactively publish their annual work reports online.	No action taken	As pointed out in this PAR Monitor, sample public authorities do not publish their annual work reports online.
3. Public authorities should start producing and publishing citizen-friendly versions of their annual budgets (financial plans).	No action taken	Even though they regularly publish annual budgets on their websites, sample authorities failed to make them citizen friendly. While no sample institution has published a "citizen budget" resembling the one published by the Ministry of Finance, MPALSG's budget comes closest to being citizen friendly. Namely, the budget section on the website is easy to find, it presents annual financial plans and reports from the past years, and section is introduced simply with couple of introductory sentences. ²¹⁹
4. Public authorities should start publishing at least one dataset pertaining to their scope of work in line with the open data standards.	Partially implemented	Majority of sampled authorities did not publish relevant open data sources on their websites. As for the national open data portal, SEPA has 23 open data sources, MCM has 13 and MPALSG has one open data source. Furthermore, SEPA and MCM have provided a link to the portal. ²²⁰
5. Information on cooperation with civil society, and external stakeholders in general, should be clearly displayed, preferably through an easily accessible website section at the homepage.	Partially implemented	As pointed out in this PAR Monitor, apart from GSG and SEPA, monitored public authorities have been proactively disclosing information on cooperation and contact with civil society organisations although in many cases in announcements of public consultations and debates and not necessarily through dedicated section. Although there are cases, out of the observed sample authorities, of easily accessible website sections on civil society from the homepage, e.g., Ministry of Construction, Infrastructure, and Transport), such practices are not uniform.

218 Examples: MPALSG, About section - <http://mduls.gov.rs/o-ministarstvu/>, and SEPA, reports and analyses section - <https://bit.ly/34YDJL0> (last accessed on 10 June 2021).

219 Example: MPALSG, available at: <http://mduls.gov.rs/javnost-u-radu/budzet-ministarstva/> (last accessed on 10 June 2021).

220 Open Data portal, available at: <https://data.gov.rs/sr/organizations> (last accessed on 10 June 2021).

<p>6. For public consultations and public debates on policy documents and legislation, a separate website section should be available as well. Alternatively, the authorities can provide a clearly visible link to the eGovernment portal where all public debates and consultations are supposed to be published.</p>	<p>Partially implemented</p>	<p>Most of sampled institution have sections dedicated to public consultations and public debates. Nevertheless, these are not necessarily featured on the homepage and information on consultations are unevenly provided. Ministry of Labour provides this information separately for each policy department, within different sections online. MPALSG website has a subsection on public debates and consultations within activities section. MCM provides a link on public debate which takes a visitor to the archive displaying previously held public debates, while MEI website contains section on public debates (with an outdated entry) and separate one for public calls. Due to uneven practice, it is considered as partially implemented.²²¹</p>
<p>7. Public authorities should always provide information in the requested format(s).</p>	<p>Partially implemented</p>	<p>Results of the CSO survey conducted within the scope of PAR Monitor 2019/2020 indicate that public authorities provide information, often or always, in the requested format in 39% of the cases, and 32% sometimes.</p>
<p>8. Public authorities should completely avoid providing information in scanned documents.</p>	<p>n/a</p>	<p>There is no available data for the assessment of this recommendation. However, anecdotal evidence from this PAR Monitor says that provision of requested information as scanned documents is still occasional practice.</p>
<p>9. Public authorities should contact information seekers when they are unsure whether they have prepared the right information, to ascertain that the request for information is properly addressed.</p>	<p>n/a</p>	<p>There is no available data for the assessment of this recommendation. However, anecdotal evidence from this PAR Monitor says that public authorities do sometimes contact requesting persons to ask for clarifications.</p>
<p>10. Finally, the pending changes to the FOI legislation in Serbia should ensure effective sanctions for all non-compliant authorities to fully protect the FOI right.</p>	<p>Initiated</p>	<p>The FOI law amendments are still pending. Status of this recommendation depends on the legal changes and practical implementation of sanctions for non-compliance accordingly. Currently, the Draft Law Amending the Law on Free Access to Information of Public Importance proposes changes regarding sanctions for non-compliant authorities. First, by adding Article 28a and Article 28b, the Draft additionally regulates that "the fine imposed for the first time cannot exceed 20,000 dinars. A fine may be imposed more than once, provided that the sum of the imposed fines does not exceed 200,000 dinars. The imposed fine is executed by the court in accordance with the law which regulates execution and security" (Draft, Article 15). Second, the Commissioner is empowered to initiate misdemeanour proceeding, and information seeker is authorized to submit a request for initiating misdemeanour proceedings in certain cases as well (Draft, Article 15). Finally, through amendment to Article 46, penalty provisions have been tightened from 5000-50000 RSD to 20000-100000 RSD and are to be imposed on heads of public authorities (Draft, Article 27).²²²</p>

221 Examples: MCM <https://www.kultura.gov.rs/tekst/sr/5916/javne-rasprave.php>, and MPALSG <http://mduls.gov.rs/category/javne-rasprave-i-konsultacije/> (last accessed on 10 June 2021).

222 Draft Law amending the Law on Free Access to Information of Public Importance, available at: <https://bit.ly/2UdsSKY> (last accessed on 10 June 2021).

PAR MONITOR 2019/2020 RECOMMENDATIONS

Most of the recommendations from the 2017/2018 PAR Monitor are still highly relevant, and majority of recommendations is repeated. Some of the recommendations which are repeated 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 2017/2018

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 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), publish 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 website section at the 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 eParticipation 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.

New recommendations 2019/2020

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. 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.
12. Public authorities at the state administration level that have appointed a contact person for cooperation with civil society, should clearly inform on doing so 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.
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.
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.

VI. SERVICE DELIVERY

VI.1 WEBER INDICATORS USED IN SERVICE DELIVERY AND COUNTRY VALUES FOR SERBIA

SD_P1_I1: Public perception of state administration's citizen orientation



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



SD_P4_I1: CSOs' perception of accessibility 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 2018

Tailoring public services to the needs of citizens remains a priority of the incumbent government, both in legislation and in practice. As assessed by the OECD, Serbia achieved notable improvement in service delivery between SIGMA's 2017 and 2019 monitoring cycles.²²³ The global pandemic and the state of emergency yielded a series of challenges and the government was forced to reorganise service provision,²²⁴ accelerate digitalisation and introduce new health-related digital services.²²⁵ Despite the progress, the state of play analysis for the purpose of this chapter indicates remaining challenges in the aspects such as harmonisation of sectoral laws with the Law on General Administrative Procedure, slow service optimisation process, lack of systemic quality control and assurance and still limited accessibility of services to users with special needs (all elaborated below).

There is no single national service delivery policy nor a single coordination mechanism for all policy documents covering this area. Instead, policy framework comprises a set of strategies, the most comprehensive of which is the newly approved PAR Strategy 2021-2030 and its Action Plan for 2021-2025.²²⁶ The Strategy places stronger emphasis on service delivery than its predecessor, including it as part of its general objective and one of its six thematic areas.²²⁷ It aims to improve service delivery through 1) developing and optimising services according to users' needs, 2) raising administrative (human, technical, and technological) capacities, and 3) improving service quality control and assurance. The implementation of the Action Plan 2018-2020 saw less than a half of activities (43%), at the level of specific objective covering services, fully implemented by the end of the implementation cycle.²²⁸

At least two additional sectoral strategies complement the policy framework for service delivery. In June 2020, the government adopted a new eGovernment Development Programme 2020-2022 with the relevant

²²³ "All countries assessed in the service delivery area in 2019 – (...) and Serbia - made significant improvements compared to 2017 (42% increase in scores)", OECD, "Government at a Glance: Western Balkans", OECD Publishing, Paris, 2020, p. 31, <https://doi.org/10.1787/a8c72f1b-en> (last accessed on 4 February 2021).

²²⁴ For example, the Government adopted a conclusion suspending the direct face-to-face contact with parties/service users (Official Gazette RS no. 35/2020-18, 37/2020-3) and a decree regulating deadlines in administrative proceedings during the state of emergency (Official Gazette RS no. 41/20, 43/20). Consequently, a large share of interaction and communication with service seekers switched to remote channels and deadlines for completing administrative procedures shifted to the period after the end of the state of emergency.

²²⁵ For example, some of the newly digital services included application for movement permit during the curfew; application for PCR testing on personal request, as well as e-notification service about PCR test results.

²²⁶ The Strategy for Public Administration Reform in the Republic of Serbia for the Period 2021–2030, available at <https://monitoring.mduls.gov.rs/downloadFile/?id=11263&type=doc> (last accessed on 7 June 2021).

²²⁷ Within its general objective, the strategy includes ensuring high quality services to citizens and business entities (p. 14). Besides service delivery as one of the thematic areas, other areas include policy development and coordination, public service and human resource management, accountability and transparency, public finance management and local self-government system.

²²⁸ Specific objective 4 "Increasing legal certainty and improvement the business environment and quality of public services provision", see: Ministry of Public Administration and Local Self-Government, Monitoring statistics on the implementation of PAR Strategy, <https://bit.ly/3pFCg1q> (last accessed on 26 May 2021).

action plan, aiming to transform the administration from clerical to a digitalised and user-centric one, with an active user engagement in service design and delivery.²²⁹ Until the end of 2020, around one third of activities initially planned for that year have been finalized and the performance indicator for the general objective of the Programme was achieved.²³⁰

Considering administrative simplification specifically, the approval of the “ePaper” programme in 2019 completed the policy framework in this area.²³¹ The programme envisages establishing more transparent and predictable business environment by eliminating redundant and simplifying and digitalising other administrative procedures, as well as establishing a single register of administrative procedures. The simplification efforts are slowly progressing: out of 2600 inventoried procedures for businesses, by the end of 2020, 5 have been abolished,²³² 130 procedures have been simplified and 27 fully digitalised.²³³ The PPS initiated the same process for citizens-related procedures.

The adoption of the Law on General Administrative Procedure (LGAP) in 2016 introduced the “once-only principle”²³⁴, but the success of its application has varied. One of the biggest challenges relates to the delayed harmonisation of 270 special laws with the LGAP, initially planned for 2018 and then for 2020.²³⁵ Another challenge relates to delayed adoption of bylaws. Besides the pandemic and the general elections in 2020, which halted legislative activities in the country, failure to meet the deadlines is partly due to the limited capacity both in the MPALSG (to oversee the harmonisation) and in line ministries and other government bodies (to work on legal amendments).²³⁶ The outcome is a continuation of regulatory uncertainty for individuals and businesses.²³⁷

Following the adoption of two significant laws in the area of digital government²³⁸, legislative framework was further updated by laws introducing specific registers, such as the Law on the Central Population Register (2019)²³⁹ and the Law on the Register of Administrative Procedures (2021).²⁴⁰ While the former register centralises a set of official registries originally kept by public institutions (e.g. citizenship, civic records, residence, etc.) the latter aims to provide a centralised public database of all administrative procedures in Serbia.

229 E-government Development Programme of the Republic of Serbia 2020-2022 and Action Plan for its implementation, p. 31, <https://bit.ly/3zaxRfw> (last accessed on 31 May 2021).

230 43.75% average grade on the EU eGovernment Benchmark. See: Annex 3 Table of activities of the E-Government Development Program as part of the 2020 Annual PAR AP 2018-2020 Report, <https://bit.ly/3cOu7Xj> (last accessed on 17 June 2021).

231 Programme for Simplification of Administrative Procedures and Regulation “ePaper” for 2019-2021, <https://bit.ly/3v3hjmg> (last accessed on 7 June 2021).

232 “Five administrative procedures have been abolished, one of which was completely abolished and four were turned into invisible services of public administration.” PAR Strategy, op. cit., p. 187.

233 Regulatory Impact Assessment for Draft Law on the Register of Administrative Procedures, <https://bit.ly/3cr5b8g> (last accessed on 7 June 2021).

234 Once-only means “that citizens and businesses provide diverse data only once in contact with public administrations, while public administration bodies take actions to internally share and reuse these data – even across borders – always in respect of data protection regulations and other constraints.” TOOP.EU, The Once-Only Principle Project, <http://toop.eu/once-only> (last accessed on 4 February 2021)

235 Article 214, Law on General Administrative Procedure, Official Gazette RS no. 18/2016-10, 95/2018-441 (authentic interpretation), <https://bit.ly/356yrwN> (last accessed on 7 June 2021); SIGMA/OECD, Monitoring Report Serbia 2019, p. 41, <http://sigmaweb.org/publications/Monitoring-Report-2019-Serbia.pdf> (last accessed on 7 June 2021).

236 SIGMA/OECD, *Monitoring Report Serbia 2019*, p. 41, <http://sigmaweb.org/publications/Monitoring-Report-2019-Serbia.pdf> (last accessed on 7 June 2021).

237 European Commission, “Commission Staff Working Document: Serbia 2020 Report”, Brussels, 6.10.2020, p. 18, <https://bit.ly/2T5zMRy> (last accessed on 8 June 2021).

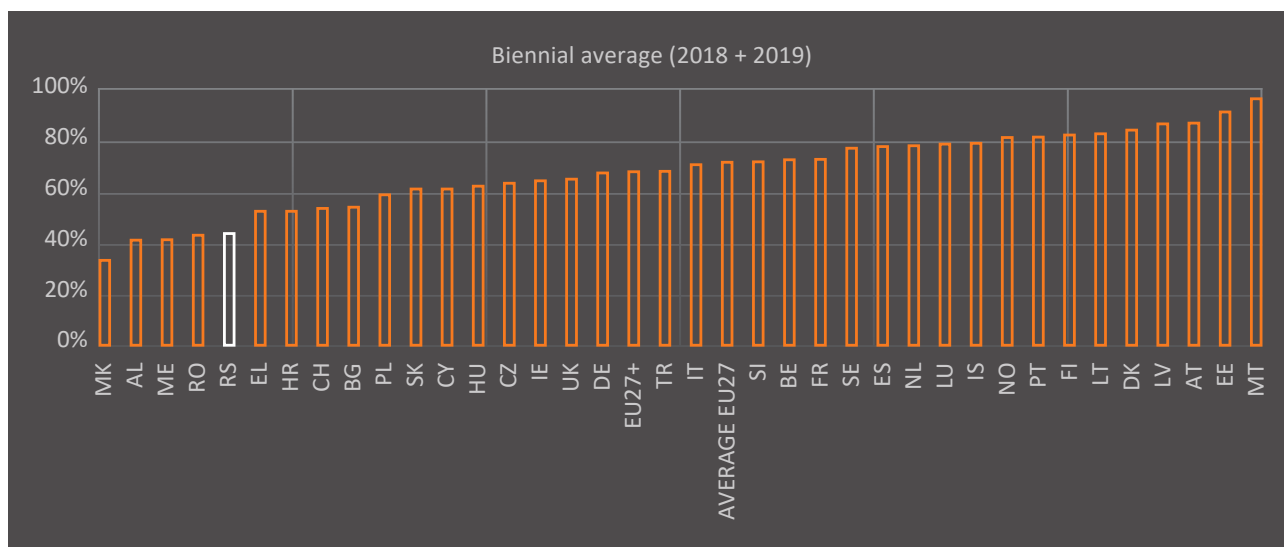
238 Law on eGovernment (Official Gazette RS no. 27/2018) and Law on eDocument, eID and Trust Services (Official Gazette RS no 94/2017 i 52/2021).

239 Official Gazette RS no. 17/2019-3, <https://bit.ly/34YiYii> (last accessed on 31 May 2021).

240 Official Gazette RS no. 44/2021-9, <https://bit.ly/3zedCNM> (last accessed on 31 May 2021).

There have been new developments with regards to delivery of digital services, but they have yet to yield results. In early 2020, the Government redesigned and relaunched the eGovernment Portal, featuring improved and mobile-friendly interface. Among the new features, it allows two-factor authentication using the mobile phone,²⁴¹ online payment options for some services²⁴² and an e-delivery of administrative acts.²⁴³ The user take-up still has to grow given that so far 1.02 million citizens (around 15% of the total population)²⁴⁴ use the portal.²⁴⁵ The government also established a national portal for eID,²⁴⁶ and international rankings of digital government performance reflect the overall country's progress. The *eGovernment Benchmark 2020*²⁴⁷ places Serbia as 32nd out of 36 observed EU27+ countries,²⁴⁸ based on the biennial average (2018 and 2019). One of the prominent problems identified in this benchmark is lack of transparency of service delivery.²⁴⁹ Additionally, based on the UN's E-Government Survey 2020, Serbia achieved 58th place out of 193 countries, below all EU members states.²⁵⁰

Graph 16: EU eGovernment Benchmark 2020: government performance in EU27+



Source: EU eGovernment Benchmark 2020

241 eGovernment Portal, Two-factor Authentication Login, <https://euprava.gov.rs/prijava-dvofaktorskom-autentikacijom-za-korisnike-sa-kvalifikovanim-elektronskim-sertifikatom> (last accessed on 8 June 2021).

242 eGovernment Portal, "Plaćanje taksi i naknada onlajn", <https://euprava.gov.rs/usluge/6344> (last accessed on 8 June 2021).

243 Local tax administrations started using the e-delivery function to deliver property tax decisions to citizens for 2020. eGovernment Portal, "Rešenja o porezu na imovinu za 2020. dostavljaju se elektronski", 1.8.2020, <https://euprava.gov.rs/resenje-poreza-na-imovinu> (last accessed on 8 June 2021).

244 Total population in 2019 was 6945235. See: Statistical Office of the Republic of Serbia, Estimates of population by age and sex (beginning, middle and end of year), <https://data.stat.gov.rs/Home/Result/18010403?languageCode=en-US> (last accessed on 31 May 2021).

245 Official data from the portal homepage is 1,026,347, <https://www.euprava.gov.rs> (last accessed on 8 June 2021).

246 eID Portal, <https://eid.gov.rs/sr-Cyrl-RS/pocetna> (last accessed on 8 June 2021).

247 European Commission, DG CONNECT, "eGovernment Benchmark 2020: eGovernment that Works for the People", 2020, <https://bit.ly/3rnl5o5> (last accessed on 4 February 2021).

248 This includes 27 European Union member states, as well as Iceland, Norway, Montenegro, Serbia, Switzerland, Turkey, the United Kingdom, Albania, and North Macedonia.

249 The benchmark "Transparency of Service Delivery" indicates to what extent governments are transparent as regards the process of service delivery. See: European Commission, DG CONNECT, "eGovernment Benchmark 2020 Country Factsheets", p. 88, 2020, <https://bit.ly/2RyHWBR> (last accessed on 8 June 2021).

250 United Nations Department of Global Communications, "United Nations E-Government Survey 2020", 2020, New York, <https://bit.ly/3gj7zPt> (last accessed on 8 June 2021).

There is no single authority for policy development and quality control and assurance in service delivery area. Coordination and leadership remain shared between several institutions²⁵¹ and inter-institutional coordination structures comprising high level government representatives.²⁵² As a result, a central system for monitoring and reporting to the public on the service provision quality, including user satisfaction, is lacking,²⁵³ while services have been rarely designed based on involvement of real users.²⁵⁴ Common standards and quality management tools for service delivery are yet to be introduced across the entire administration.²⁵⁵ A number of institutions mostly use the ISO 9001 standard (setting requirements for a quality management system), but quality management tools are not promoted or systematically applied across the administration. MPALSG is the first body to implement the Common Assessment Framework (CAF).²⁵⁶ The new PAR strategy plans to overcome these shortcomings until 2025 by a series of activities, including establishing an independent agency for monitoring, control and assurance of service delivery quality, implementing CAF in 10 state administration bodies, developing methodologies for measuring performance of service providers and user satisfaction, as well as conducting those measurements.²⁵⁷

Finally, accessibility of public services for persons with special needs and disadvantaged parts of the population remains a challenge, as service provision continues being unevenly distributed across the country.²⁵⁸ At the time of writing of this report, 14 municipalities in Serbia have received funds from MPALSG and established one-stop shops as defined in the LGAP.²⁵⁹ However, five years following the LGAP adoption, activities continue without the planned decree to regulate the conditions and criteria for establishing one-stop shops, as well as cooperation between bodies in this respect.

With regards to accessibility of digital services, in late 2018 the Government adopted a bylaw regulating detailed conditions for the development and maintenance of websites of public authorities.²⁶⁰ The bylaw prescribes accessibility criteria for webpages, largely in line with international ITC accessibility standards such as WCAG 2.0.^{261 262} According to recent assessment, a significant share still do not fully meet the e-accessibility requirements. In 2020, 47.47% of state administration bodies, 35.58% of local self-government units, and 45.90% of bodies in autonomous regions complied with the e-accessibility criteria.²⁶³ In a research conducted by the International Telecommunication Union, persons with disabilities expressed remarks on the user-friendliness of the e-government, such as lack of clearer instructions, requirements for in-person visits before digital services can be used, and overly challenging registration procedures.²⁶⁴

251 Leading institutions in service delivery include the MPALSG, the Office for IT and eGovernment, the Prime Minister's Office, as well the Public Policy Secretariat (in terms of administrative simplification).

252 For example, coordination body for monitoring implementation of the ePaper programme. See Decision Establishing the Coordination Body for Monitoring the Implementation of the Programme for Simplification of Administrative Procedures and Regulation "e-Paper" for the period 2019-2021 (Official Gazette RS no. 64/2019-7), <https://bit.ly/3zlaaRV> (last accessed on 8 June 2021).

253 As SIGMA pointed out: "Statistics on the volume of services delivered through different channels, cost per service, or information on user feedback are not centrally collected or otherwise available." See: SIGMA/OECD, Monitoring Report Serbia 2019, op. cit., p. 43.

254 See: Dragana Bajić, "Designing Better Public Services in Serbia: With Citizens, Not Only for Them", European Policy Centre, Belgrade, 2019, <https://bit.ly/2THRZVU> (last accessed on 8 June 2021).

255 PAR Strategy 2021-2030, op. cit., p. 148.

256 Ibid.

257 Action Plan for Implementation of the Public Administration Reform Strategy in the Republic of Serbia for the period of 2021-2025, pp. 31-31, http://mduls.gov.rs/wp-content/uploads/AP_SRJ_2021-2025_eng.pdf (last accessed on 7 June 2021).

258 SIGMA/OECD, Monitoring Report Serbia 2019, op. cit., p. 33.

259 Ministry of Public Administration and Local Self-Government, "Osam gradova i opština dobija 40 miliona dinara za uspostavljanje jedinstvenog upravnog mesta", 22.4.2021, <https://bit.ly/3pBXRfW> (last accessed on 8 June 2021).

260 Decree on detailed conditions for the development and maintenance of websites of bodies, Official Gazette RS no. 104/2018-10. WCAG stand for Web Content Accessibility Guidelines, available at <https://www.w3.org/TR/WCAG20/> (last accessed on 18 June 2021).

261 WCAG stand for Web Content Accessibility Guidelines, available at <https://www.w3.org/TR/WCAG20/> (last accessed on 18 June 2021).

262 International Telecommunication Union, "ITU study on the assessment of digital accessibility policies in Serbia", Geneva, 2021, p. 38. <https://bit.ly/3wDSoaC> (last accessed on 18 June 2021).

263 Ibid., p. 21.

264 Ibid., p. 26.

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.

From the perspective of civil society and the wider public, these principles bear the most relevance in their 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 with 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, digitalisation, and feedback mechanisms.²⁶⁵ Since public perception survey was implemented during the COVID19 pandemic, citizens were also asked additional questions on how interested they were to explore more about electronic services since the outbreak and how frequently they have used them during the pandemic. Perception data from these questions were not used for measuring indicator values.

In the measurement of the accessibility of administrative services for vulnerable groups and in remote areas, data from a survey of civil society and a focus group with selected CSOs were used,²⁶⁶ 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.²⁶⁷ Finally, the websites of providers of the same sampled services were analysed to collect information on their accessibility and prices.

265 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 the Western Balkans during 5 May - 30 May 2020. For Serbia, the margin of error for the total sample of 1005 citizens is $\pm 3.15\%$, at the 95% confidence level.

266 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.

267 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.

VI.4 WEBER MONITORING RESULTS

PRINCIPLE 1: POLICY FOR CITIZEN-ORIENTED STATE ADMINISTRATION IS IN PLACE AND APPLIED

WeBER indicator SD_P1_I1: Public perception of the citizen orientation of public administration

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Citizens are aware of government administrative simplification initiatives or projects	2/2	1/2
E.2 Citizens confirm that administrative simplification initiatives or projects of the government have improved service delivery	4/4	4/4
E.3 Citizens confirm that dealing with the administration has become easier	4/4	2/4
E.4 Citizens confirm that time needed to obtain administrative services has decreased	4/4	2/4
E.5 Citizens consider that administration is moving towards digital government	2/2	2/2
E.6 Citizens are aware about the availability of e-services	2/2	1/2
E.7 Citizens are knowledgeable about ways on how to use e-services	2/2	2/2
E.8 Citizens use e-services	2/4	2/4
E.9 Citizens consider e-services to be user-friendly	2/2	2/2
E.10 Citizens confirm that the administration seeks feedback from them on how administrative services can be improved	1/2	1/2
E.11 Citizens confirm that the administration uses their feedback on how administrative services can be improved	4/4	4/4
Total score	29/32	23/32
Indicator value (scale 0 – 5)²⁶⁸	5	4

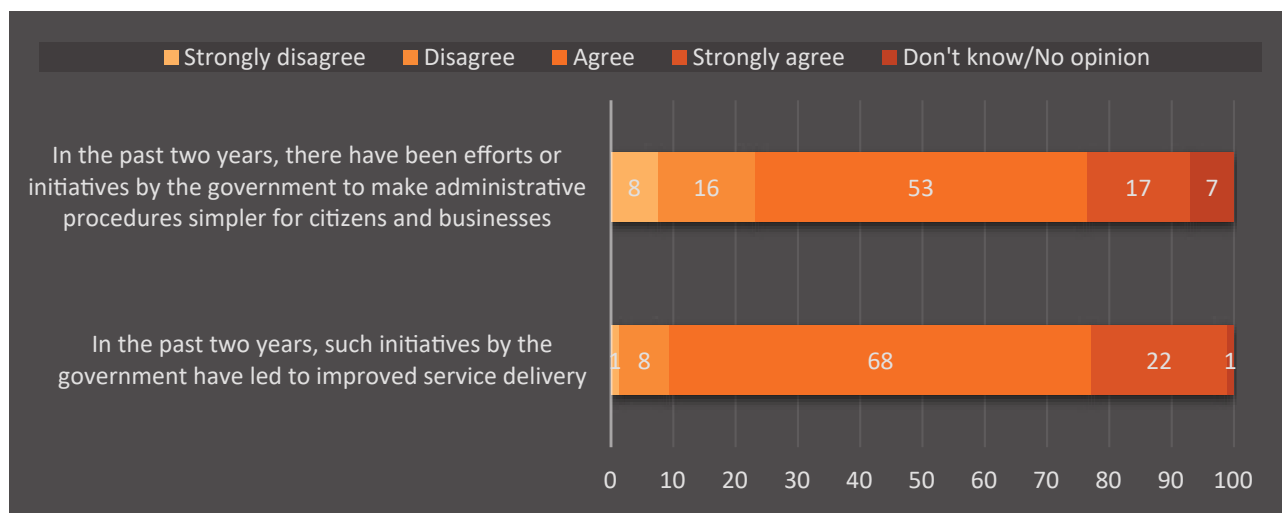
Serbian citizens perceive the state administration as largely citizen-oriented. Measurement of this indicator revealed an overall positive perception regarding all the examined elements. The indicator consequently achieved a maximum value on the five-point scale and an increase compared to the same measurement in 2017/2018 cycle. A notable finding, however, is that citizens who interacted with the administration in the past two years in general tend to have slightly less positive experience and satisfaction compared to the total population.

First, the survey findings point to an enhanced visibility of administrative simplification. Seven out of ten (70%) of Serbian citizens recognise Government initiatives to make administrative procedures simpler for citizens and businesses, representing a jump in 15 percentage points compared to the baseline monitoring. The perception of those who interacted with the administration in the past two years is equally positive (69.5%). Among citizens who are aware of government simplification efforts,²⁶⁹ there is a significant agreement (close to 90%) that such efforts have actually led to improved service delivery. Findings confirm that making the user experience simpler can have an immediate effect on satisfaction of service users, which can serve as an encouragement for further simplification.

268 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

269 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("In the past two years, there have been efforts or initiatives by the government to make administrative procedures simpler for citizens and businesses"), n = 701.

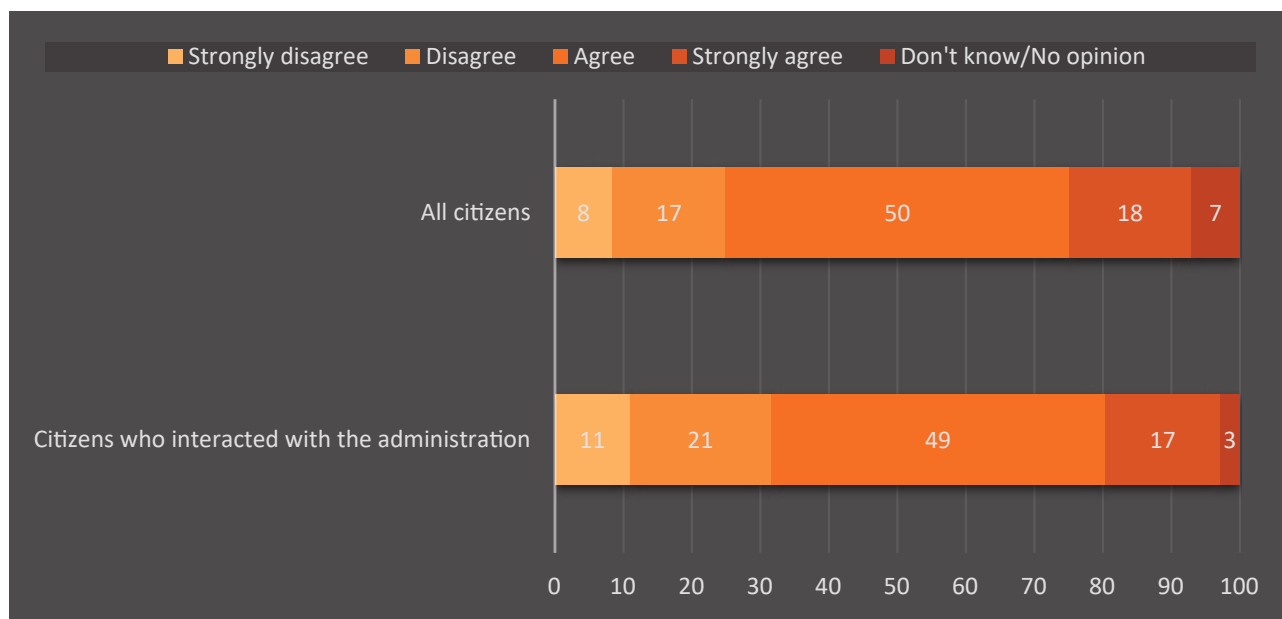
Chart 18. Public perception on simplification of administrative services (%)



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 $N = 1005$; $n = 701$.

Citizens' perception about specific aspects of interaction with the administration has also improved compared to the 2017/2018 cycle. Most citizens believe that dealing with the administration has become easier in the past two years (65%) and that it takes less time to obtain administrative services (68%). Overall, findings demonstrate another increase in positive perception since the baseline measurement, when the agreement rate for each of the two analysed questions was around 40%. Reasons for improvement could refer to procedures being simplified, but also to better application of the principle of efficiency as stipulated in the LGAP. In contrast, roughly a quarter of citizens who do not recognise practical improvements suggests the need for more thorough quality control and monitoring of implementation of administrative procedures.

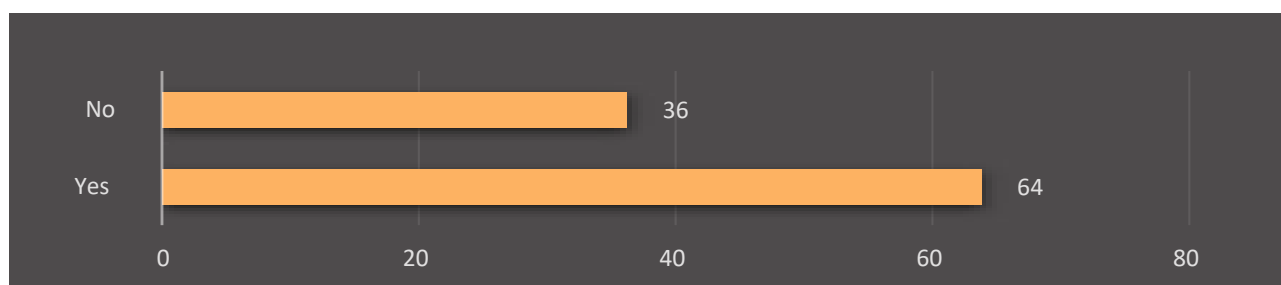
Chart 19. In the past two years, the time needed to obtain administrative services has decreased (%)



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 $N = 1005$; $n = 566$.

Similar to the abovementioned results, public awareness about digital government reform and availability of digital services is increasing. Four out of five (81%) citizens recognise that the Government has been moving towards digitalisation, which is an increase since the 2017/2018 survey, when 70% had the same answer. A significant improvement, reflected in as many as 23 percentage points increase, is that more than a half of Serbia's population (64%) knows that the government offers e-services. In parallel to these encouraging findings, more than a third of the population (36%) still does not have any knowledge that that e-services exist. Looking at the structure of the population, 58% of those above 60 years of age do not know about digital channels, which does not come as a surprise, but an emphasis can be placed to 32% of the population between 45 and 60 and a quarter of the population between 30 and 44 who are unaware of e-services. Moreover, of those who interacted with the administration in the past two years, an entire quarter (25%) have no knowledge about e-services. Findings like these can be further analysed to better inform and target government's future promotional activities.

Chart 20. Are you aware if e-services (or administrative services via the internet) are offered in your country? (%)



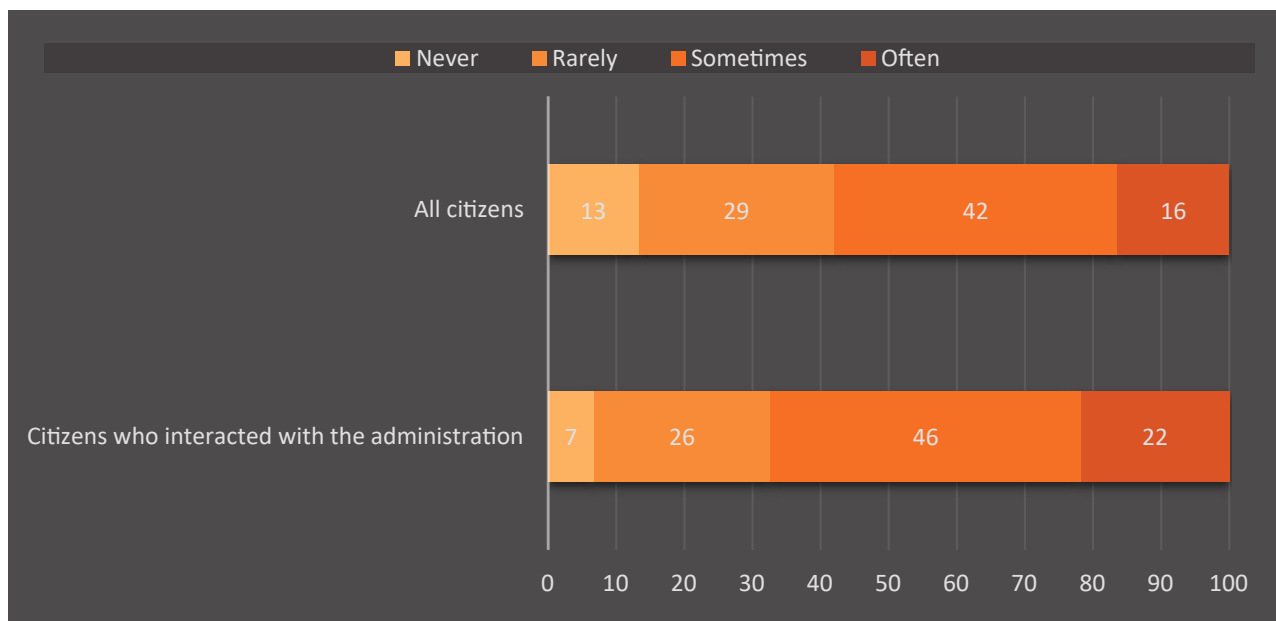
Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for this question was N = 1005.

The frequency of the use of e-services has yet to improve. Citizens who are aware of digital services and know how to use them²⁷⁰ were additionally asked how often they used such services in the past two years. A majority (58%) responded "sometimes" or "often". This marks an improvement since the 2017/2018 cycle, when there was less than a half of frequent users. However, two out of five (42%) respondents have rarely or never used digital services. It is interesting to note that as many as 21% of respondents living in South and East of Serbia responded "never" to this question, which is the largest number compared to other regions. Findings on the somewhat limited use of e-services can serve the debate about discrepancies between policy aims and outcomes. Reasons for a slow user take-up, to be further analysed, could relate to still complicated procedures, discouraging solutions for using digital signature, limited digital literacy of the population, or limited accessibility of services to persons with disabilities.

270 88% of those who are aware.

Finally, perception findings suggest that digital services are predominantly user-friendly. A large majority (83%) of citizens that had used digital services in the last two years confirm that they are in general easy to use. On the other hand, more than a third of the population could not always complete the procedure they started: while 47% managed to finalise (obtain) the service they requested, 39% completed this activity only sometimes, 11% rarely and 2% never.

Chart 21. Thinking about the past two years, how often have you used e-services of the administration? (%)

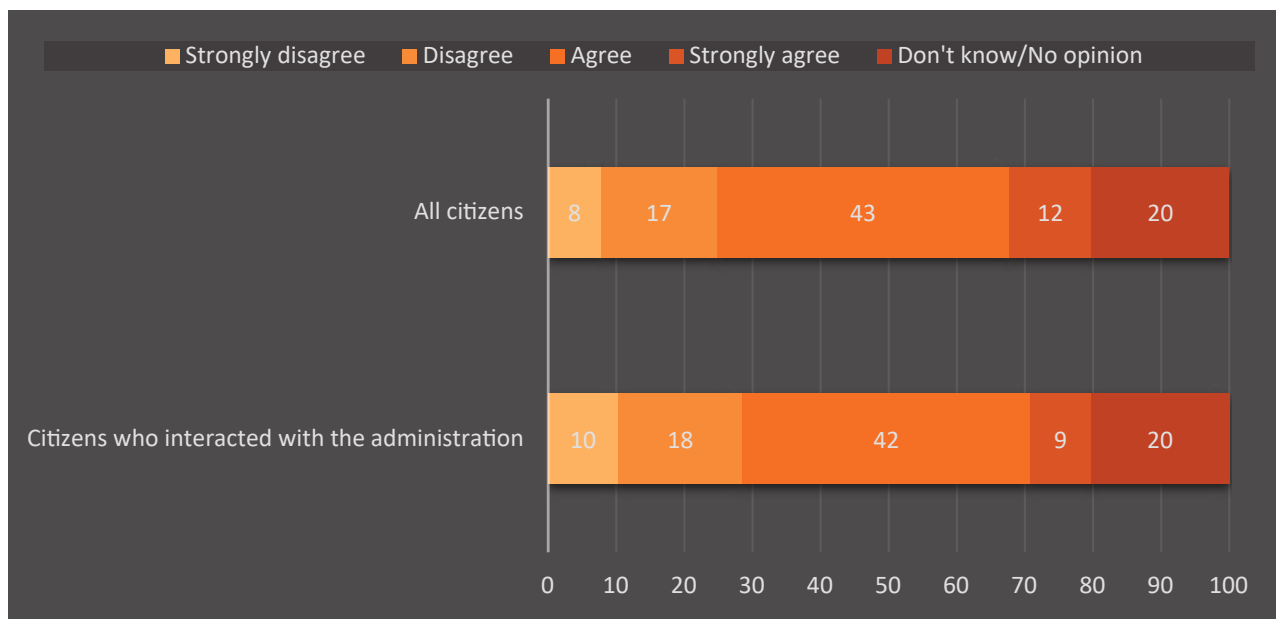


Note: The question was answered by citizens who are aware of e-services and knowledgeable about how to use them. Results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was n=611, n=413

Considering user engagement in service delivery, citizens feel more engaged than before in suggesting improvements on administrative services, but this progress is very gradual. More than a half (55%) agree that administration has asked for citizens' proposals for improvement in the past two years (in 2017/2018, it was roughly one third), with slightly lower agreement of those who recently interacted with the administration (51%). Nevertheless, 20% do not know if such practices exist and a quarter (25%) believe that this is not the case. When those who provided a positive answer²⁷¹ are further asked whether the government uses such proposals to improve its services, 89% of them confirmed this is the case, up by one percentage point since the baseline monitoring. Findings indicate an overall positive yet slow change since the 2017/2018 cycle.

271 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("In the past two years, the administration has asked for the citizens' proposals on how to improve administrative services"), n = 553.

Chart 22. In the past two years, the administration has asked for citizens' proposals on how to improve administrative services (%)

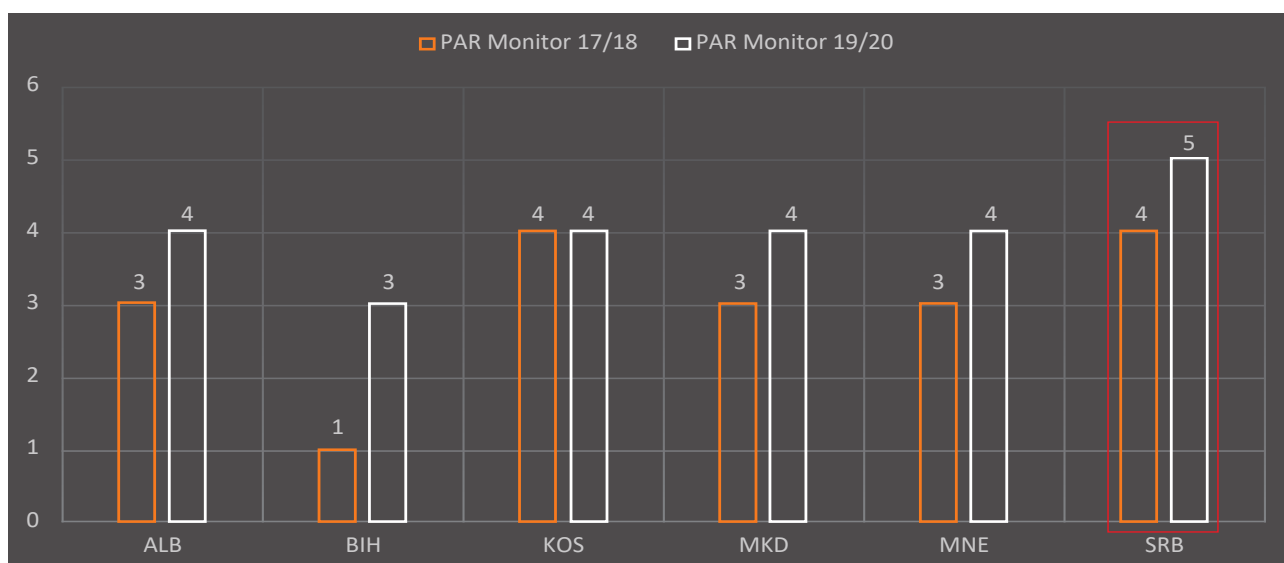


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1005; n = 566.

Overall, Serbian citizens perceive public administration as predominantly citizen oriented. As a result, this indicator received the highest value on a five-point scale and showed improvement compared to the PAR Monitor 2017/2018. Perceptions of Serbian citizens are overall more positive than for the average of the Western Balkans. On the other hand, citizens who interacted with the administration in the past 2 years tend to have slightly less positive opinion compared to the entire population, contrary to the 2017/2018 survey results, where such citizens had more positive opinion than the total population.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 17: Indicator SD_P1_I1: Public perception of state administration's citizen orientation



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

PRINCIPLE 3: MECHANISMS FOR ENSURING THE QUALITY OF PUBLIC SERVICES ARE IN PLACE

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Citizens consider they have the possibility to provide feedback on the quality of administrative services	2/2	1/2
E.2 Citizens perceive feedback mechanisms as easy to use	2/4	4/4
E.3 Citizens perceive themselves or civil society as involved in monitoring and assessment of administrative services	2/4	0/4
E.4 Citizens perceive that administrative services are improved as a result of monitoring and assessment by citizens	4/4	4/4
E.5 Basic information regarding citizens' feedback on administrative services is publicly available	0/4	2/4
E.6 Advanced information regarding citizens' feedback on administrative services is publicly available	0/2	0/2
Total score	10/20	11/20
Indicator value (scale 0 – 5)²⁷²	2	2

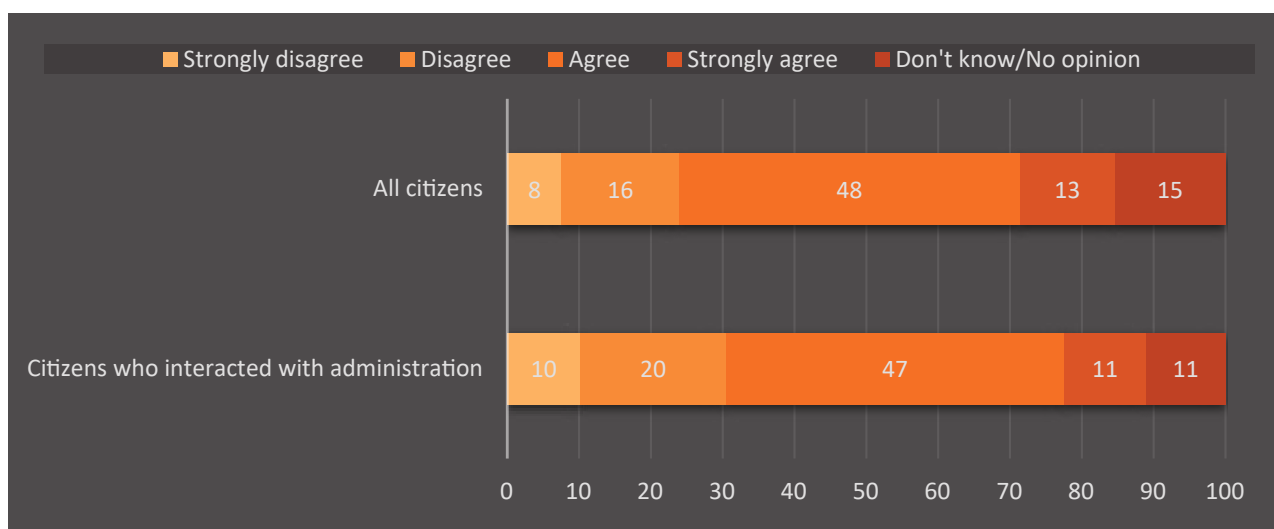
The previous indicator observed whether administrations proactively seek for citizens' proposals on how to improve service delivery in general. This indicator takes a narrower perspective and analyses if citizens, as users of public services, can provide direct feedback on the quality of specific services they receive. Findings suggest mainly positive public perception on possibilities for providing user feedback. On the other hand, webpage analysis of service providers reveals that they seldom publish information on the received feedback.

272 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

Most citizens confirm that feedback channels are available. Three out of five (61%) citizens feel that they have possibilities to provide feedback on the quality of individual services that they receive, up by 28 percentage points since the baseline monitoring. On the other hand, 24% of the population do not believe such possibility exists and 15% do not have a clear opinion. Perception of those who recently interacted with the administration is somewhat less positive, with 58.5% of those who confirm existence of feedback channels and 30% who do not.

Positive perception further drops with questions regarding user-friendliness of the feedback mechanisms. Survey results suggest that feedback channels are fairly easy to use, but are being used to a limited extent: less than a half (43%) of those that see feedback possibilities²⁷³ claim that channels are easy to use.²⁷⁴ Furthermore, a comparable share (34%) have not even used such channels in the past two years, while 19% find them difficult to use. Underutilised feedback channels draw attention to the questions of their accessibility, visibility and promotion, the proactivity of service providers in engaging users to provide feedback, and potentially user trust in the effects of providing feedback.

Chart 23. 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 = 566.

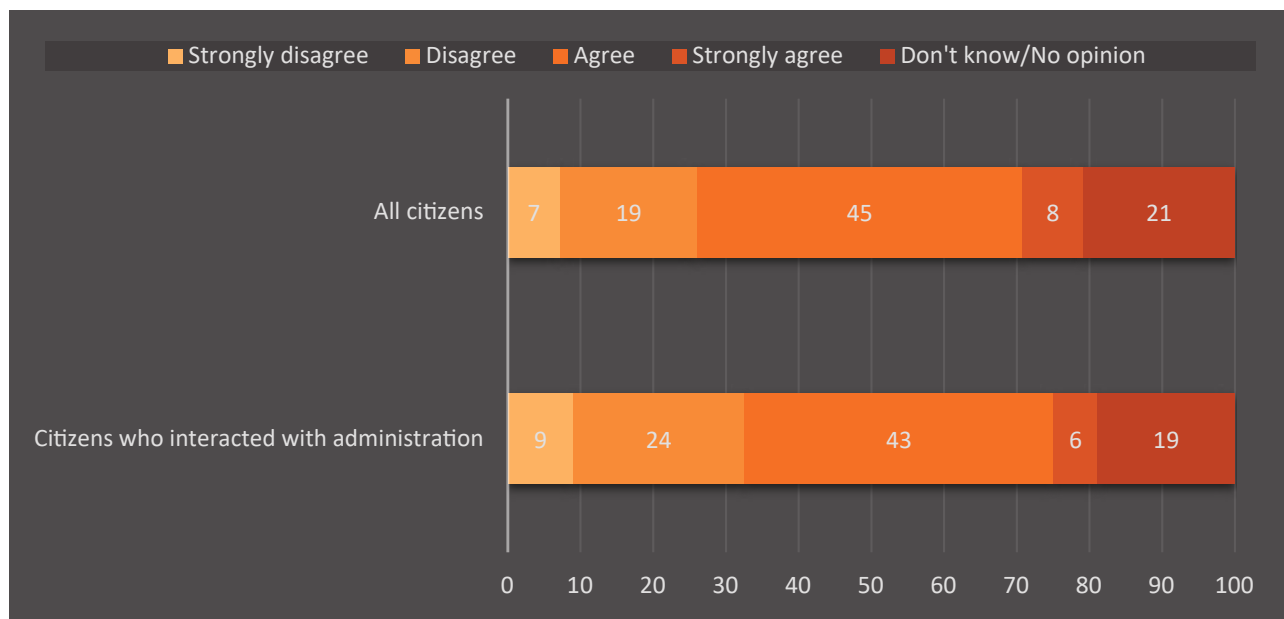
There has been a positive shift of public opinion regarding the involvement of citizens and CSOs in monitoring of administrative service delivery. Slightly more than half of the population (53%) considers that civil society or citizens have engaged in such monitoring in the past two years. This percentage almost doubles the one received during the 2017/2018 cycle. Yet again, citizens who interacted with the administration tend to have a less positive view (48% agrees that such initiatives existed). On the other hand, out of total surveyed citizens in the current cycle, 47% consider there were no engagements in monitoring service delivery (26%) or do not hold an opinion (21%). Notwithstanding the limited awareness of parts of the population, there has been improvement since the start of the WeBER monitoring work because the percentage of those who do not have an opinion dropped from 42% to 21%. Finally, from those citizens that recognise citizen/CSO monitoring activities,²⁷⁵ 85% believe that such bottom-up pressure has led to improvements in service delivery.

273 Those who responded "Agree" or "Strongly Agree" to the preceding statement ("As a user of administrative services, I have possibilities to give my opinion on the quality of the individual services that I receive (obtain)"; n=609.

274 It should be noted that the 2020 public perception survey included a minor modification to avoid superfluous sub-sampling. Instead of having a question analysing if citizens had actually used the opportunities to provide opinions on the quality of administrative services, the question examining how easy or difficult such channels were to use included an "I have not used them" option.

275 Those who responded "Agree" and "Strongly Agree" to the statement ("In the past two years, citizens or civil society have been involved in the monitoring of administrative services"), n = 529.

Chart 24. 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 $N = 1005$; $n = 566$.

This indicator further analysed whether state administration bodies publish information (basic²⁷⁶ or advanced²⁷⁷) on feedback they receive from citizens. Review of websites of providers of a sample of five administrative services²⁷⁸ identified a general lack of transparency. Only in cases of business registrations do the annual reports of the responsible agency, the Business Registers Agency (BRA), present up to date basic information on the numbers of received and resolved complaints.²⁷⁹ The Republic Geodetic Authority (RGA) publishes the most frequent reasons citizens appeal first instance conclusions related to property cadastre,²⁸⁰ but the page refers to 2016. Contrary to findings from the baseline monitoring, the redesigned eGovernment Portal excludes the opportunity for service users to leave a comment or star-rate a service, and it does not publish anymore feedback collected by the old version of the portal. Advanced information on feedback from citizens is also missing for any of the sampled services, as in the baseline PAR Monitor. Findings therefore point to persisting problems of measuring and publicly reporting on user satisfaction, reflected in a general lack of proactive transparency.

Overall, results did not change the indicator value compared to the previous monitoring. Improvements refer to citizens being more positive regarding the possibilities to provide opinion as users of services, as well as perception on the involvement of citizens or civil society in the monitoring of administrative services. On the other hand, citizens who interacted with the administration in the past two years tend to have slightly less positive opinion. The redesign of the eGovernment Portal, although bringing various improvements, disabled visitors from seeing reviews of services, which until then had represented a rare possibility for informing on user feedback. Finally, some service providers failed to update pages on user complaints.

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

277 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).

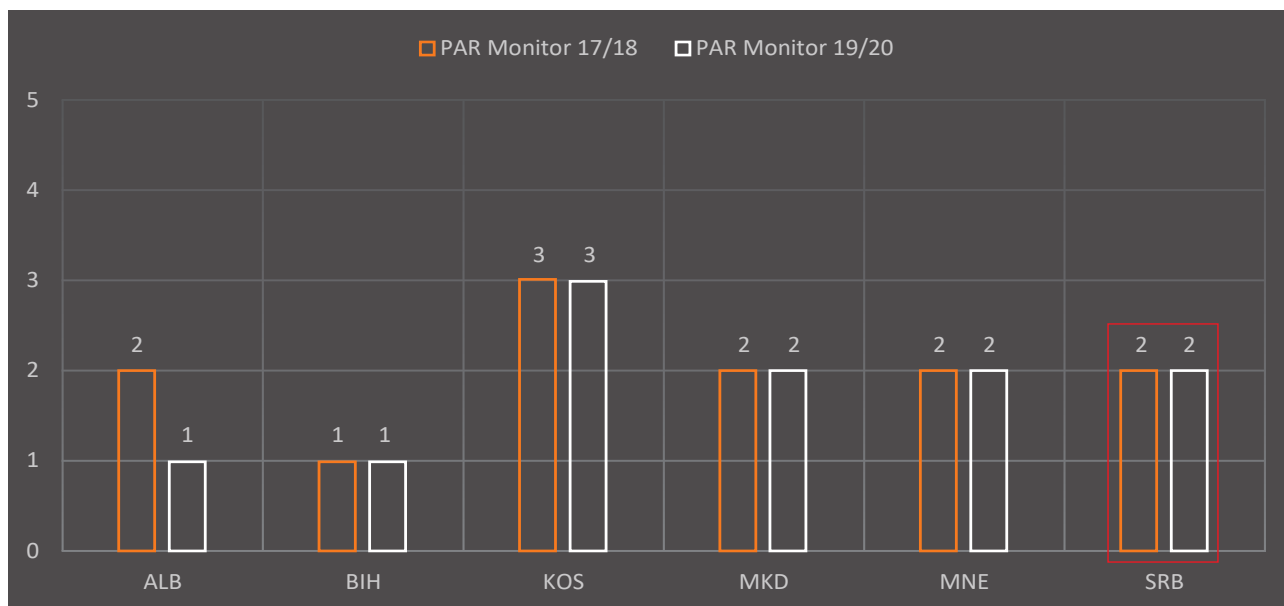
278 The indicator included the following services: property registration, company (business) registration, vehicle registration, the issuing of passports and ID cards, and value added tax (VAT) declarations and payments for companies. Findings

279 The Business Registers Agency publishes annual work reports with general statistics on complaints it received in its 2018 and 2019. See: Business Registers Agency, "Godišnji izveštaji o radu", apr.gov.rs, <https://tinyurl.com/y8rolm15> (last accessed on 8 June 2021).

280 Republic Geodetic Authority, "Žalbe na prvostepena rešenja", rgz.gov.rs, <https://bit.ly/3pzF3xt> (last accessed on 8 June 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 18: Indicator SD_P3_I1: Public perception and availability of information on citizen feedback regarding the quality of administrative services



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

PRINCIPLE 4: MECHANISMS FOR ENSURING THE QUALITY OF PUBLIC SERVICES ARE IN PLACE

WeBER indicator SD_P4_I1: CSOs' perception of accessibility of administrative services

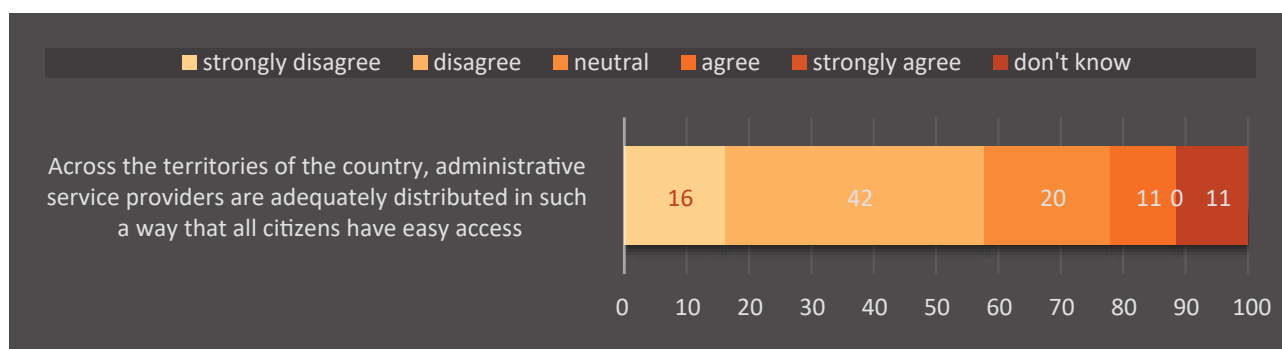
Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 CSOs confirm the adequacy of territorial network for access to administrative services	0/4	0/4
E.2 CSOs confirm that one-stop-shops are made accessible to all	0/4	0/4
E.3 CSOs consider administrative services to be provided in a manner that meets the individual needs of vulnerable groups	0/4	0/4
E.4 CSOs confirm that administrative service providers are trained on how to treat vulnerable groups	0/2	0/2
E.5 CSOs confirm that the administration provides different channels of choice for obtaining administrative services	1/2	0/2
E.6 CSOs confirm that e-channels are easily accessible for persons with disabilities	0/2	0/2
Total score	1/18	0/18
Indicator value (scale 0 – 5)²⁸¹	0	0

CSOs remain largely discontented in relation to the accessibility of administrative services. Very few CSO representatives (around 10% or less) respond positively about different aspects of accessibility for vulnerable groups, while a significant share (about 50% or more) express dissatisfaction. Focus groups with civil society organisations dealing with persons with disabilities confirmed the survey findings.

281 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

Survey and focus group findings point to inconsistent administrative service provision throughout the country, affecting the exercise of citizens' rights.²⁸² First, CSO representatives believe that service providers are inadequately distributed across Serbia. More than a half (58%) believe that current territorial distribution makes the services unequally accessible to all citizens, while 11% do not see problems in this respect and 20% are neutral. Focus group participants highlight that "centralization of services remains an issue." According to some, authorities in smaller areas of the country often lack jurisdictions, which forces the users to travel to the competent authorities in larger, remoter, municipalities. Furthermore, focus group participants complained about a non-uniform application of procedures in different parts of the country, explaining that it is often the case that civil servants who provide services in the capital of Belgrade, for instance, interpret same legal provisions differently than their colleagues from the south of Serbia.²⁸³ Lack of standard in service provision therefore impacts equal access.

Chart 25. 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 = 149.

Opinion of civil society about the availability of one-stop shops being established around Serbia is equally negative. Surveyed CSO representatives believe that one-stop shops, through their geographic distribution, are not easily accessible to all users of services. While 52% share this opinion, only 8% agree that one-stop shops are in fact accessible, but no respondent strongly agrees. Focus group participants are unanimous in the opinion that one-stop shops can significantly simplify users' experience through different procedures. However, they have not noticed significant progress in facilitating physical access to official buildings for people with special needs.

Perception findings further indicate that administrative service provision lacks tailor-made approaches, towards the users with special needs in particular. While 7% of CSO representatives agree that administrative service provision is adapted to the vulnerable groups, a large majority (60%) disagrees. An example relates to deficient technical assistance when filling out public administration forms, as well as insufficient accessibility of written material to persons with impaired hearing or sight.²⁸⁴ Results additionally suggest that administrative staff providing services require better training on how to serve vulnerable categories of the population: close to 60% of CSO representatives see staff as inadequately trained, while only 5% consider the opposite. More than a third of respondents (36%) are neutral or could not respond. Focus group participants underline the need for applying codes of conduct in state institutions with clear rules for serving users with special needs. Emphasized problems relate to poor and often unpleasant or insensitive communication practices, aggravated in cases when users are unclear about their rights and institutions do not communicate them in a clear way.²⁸⁵ Problems of communication and information provision about services multiplied during the

282 Focus group of civil society organisations dealing with accessibility issues and vulnerable groups, held on 15 October 2020.

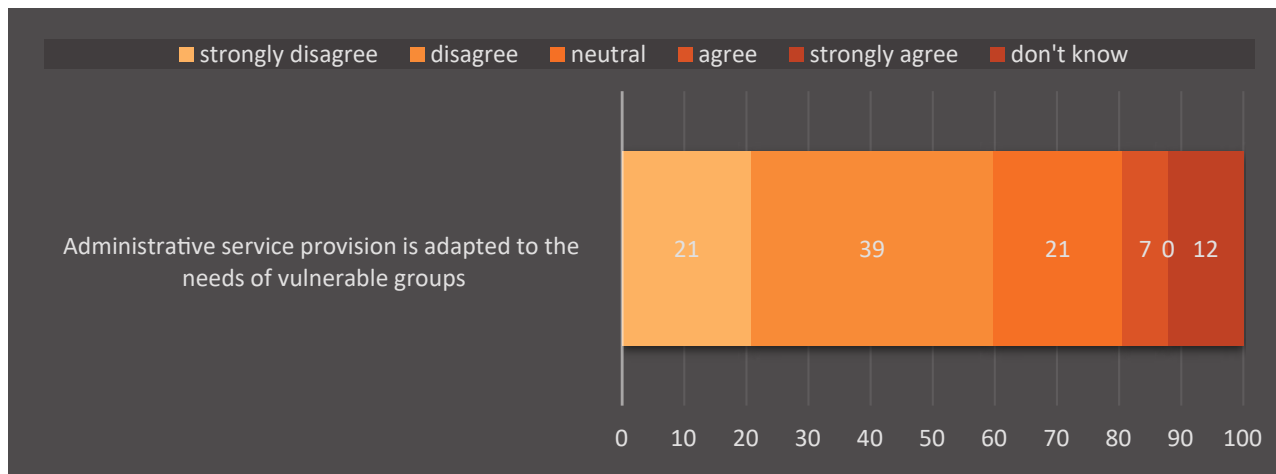
283 Ibid.

284 Focus group of civil society organisations dealing with accessibility issues and vulnerable groups, held on 15 October 2020.

285 Ibid.

COVID-19 lockdowns,²⁸⁶ when vulnerable parts of the population faced serious restrictions.²⁸⁷ Overall, these findings cast doubt on the application of the principle of aid to parties, as one of the fundamental principles of administrative proceedings, where authorities need to ex officio take care that the ignorance of parties does not prejudice the rights they enjoy under the law.²⁸⁸

Chart 26. 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 = 149.

An exception to the prevailing negative civil society opinion relates to the availability of channels of choice (e.g., in-person, electronic) for obtaining administrative services, although these channels remain insufficiently accessible for persons with disabilities. Close to a third of respondents (30%) recognise that the administration offers a variety of channels, which is a better result than the average for the Western Balkans (26%) and an increase in 4 percentage points since the previous monitoring. Improved opinion is in line with the increased visibility of digitalisation in the entire population, discussed earlier. It is however significant that roughly a third as well disagree (29%) and are indecisive (32%) when asked this question, while 9% do not have an opinion. Additionally, even if survey respondents recognise availability of e-channels, they are not as certain that such channels are easily accessible for persons with disabilities: while 8% agrees, close to a half (48%) disagrees. Focus group participants confirm the quantitative findings and emphasise that electronic channels function well, but lack simplicity and uniformity, much needed for enabling easier access for users with special needs. Moreover, the issue of digital divide remains present and efforts to reduce the gap between increased digitalisation and improving digital literacy of service users are modest.²⁸⁹ Many users with special needs are not technically well-versed and can hardly actively use electronic channels.²⁹⁰

286 Ibid.

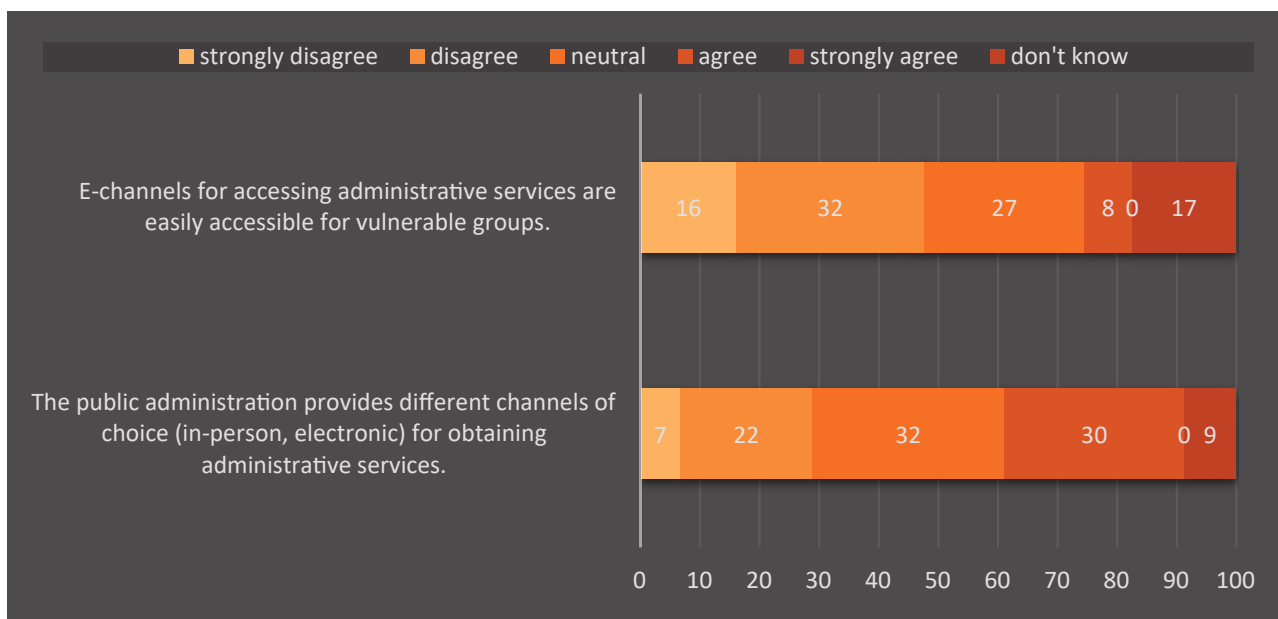
287 See: Commissioner for Protection of Equality, "Regular Annual Report of the Commissioner for Protection of Equality for 2020", Belgrade, 2021, pp. 102-127, <https://bit.ly/3w5lDTs> (last accessed on 8 June 2021).

288 Article 8, Law on General Administrative Procedure, op. cit.

289 Focus group of civil society organisations dealing with accessibility issues and vulnerable groups, held on 15 October 2020.

290 Ibid.

Chart 27. CSO perception on channels of choice and accessibility of e-services (%)

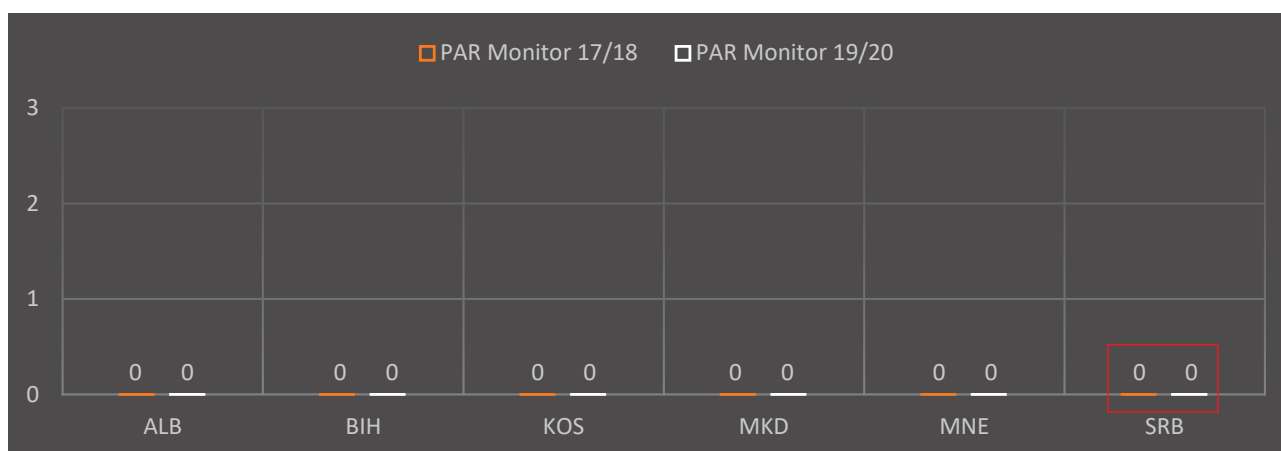


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for this question was N = 149.

General perception of CSOs remains equally negative as in the baseline monitoring. One identified difference stems from the satisfactory level of agreement (30%) with the statement on existence of different channels of choice for obtaining administrative services, found in this monitoring cycle. Responses to other statements concerning the provision of administrative services to vulnerable groups of population are considerably more negative in both the baseline and current monitoring cycles.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 19: Indicator SD_P4_I1: Public perception of state administration's citizen orientation



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

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

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Websites of administrative service providers include contact information for provision of services	4/4	4/4
E.2 Websites of administrative service providers include basic procedural information on how to access administrative services	4/4	2/4
E.3 Websites of administrative service providers include citizen-friendly guidance on accessing administrative services	1/2	1/2
E.4 Websites of administrative service providers include information on the rights and obligations of users	2/2	2/2
E.5 Individual institutions providing administrative services at the central level publish information on the price of services offered	4/4	4/4
E.6 The information on the prices of administrative services differentiates between e-services and in-person services	1/2	0/2
E.7 Information on administrative services is available in open data formats	0/2	0/2
Total score	16/20	13/20
Indicator value (scale 0 – 5)²⁹¹	4	3

The second accessibility indicator is based on a review of websites of providers of same five services used in the indicator on availability of information on citizen feedback regarding the quality of administrative services.²⁹² During the period of measurement (May 2020) the approach of service providers varied depending on the type of information examined, but there has been an overall improvement compared to the baseline monitoring. Information that is often lacking relates to citizen-friendly guidance on accessing administrative services.

Users of sampled services can easily find details who to contact for various inquiries on specific services. For all five services, institutions supplied necessary contact information (both phone and email). Most providers operate tailor made “info centres” and publish a clear description of types of information that these centres can provide, alongside their working hours. Contact details of branches or offices around Serbia are also usually included. As in the baseline monitor, BRA continues the good example of providing email addresses of specific internal organisational units in charge of different matters,²⁹³ while RGA is exemplary in terms of providing contact details of individual cadastre offices around Serbia, which include information on whether their buildings are accessible to persons with disabilities.²⁹⁴

Webpage analysis further examined whether users could find information on their rights and obligations with regards to documents and information that needs to be submitted. In other words, if it is clarified to users which specific information they are entitled to have procured by the administration and which they need to obtain and submit themselves. Providers of all five sampled services include such information on their webpages. For example, the Ministry of the Interior (Mol), in the webpage section dedicated to the citizens’ ID cards, makes a clear distinction on the obligations of users and the documents that the administration can obtain ex officio. This finding suggests that the “once only” principle introduced by the LGAP is being implemented, although the principle is often not uniformly applied in practice.²⁹⁵

291 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

292 These services being property registration, company (business) registration, vehicle registration, the issuing of personal documents (passports and ID cards), and tax administration (value added tax (VAT) declaration and payment for companies). Accessibility of information available online is analysed through the number of clicks necessary to find the information starting from the homepage (not more than three), and if it is at a logical location (under a relevant page or heading). The eGovernment portal was also checked in addition to the individual service providers’ websites.

293 See Business Registers Agency, “Contacts”, <https://bit.ly/2RBkP9Z> (last accessed on 8 June 2021).

294 See Republic Geodetic Authority, “Contacts of the Real Estate Cadastre Services”, [rgz.gov.rs, https://bit.ly/2RFAGV2](https://bit.ly/2RFAGV2) (last accessed on 8 June 2021).

295 „However, in practice, officials are often reported to suggest that it would be quicker for applicants to bring the document from another government body by themselves”. See: SIGMA/OECD, Monitoring Report Serbia 2019, op. cit., p. 41.

Apart from the contact details and necessary documents, citizens can easily find information on prices of different service fees. This is the final information provision criterion found to have been fulfilled in the entire sample. Uncertainty, however, exists in the description of the vehicle registration service, which mentioned a municipal utility fee for keeping the vehicle but did not make that cost explicit, leaving the user with the need for further research. Price information seldomly distinguishes between in-person and online services because digitalisation of services remains slow. Only business registrations (for LLCs specifically) and VAT declaration and payments are fully available online, from request to receipt. While VAT declarations are exclusively done through the eTax portal free of charge, the provider of business registration is transparent about the fees for using online as opposed to in-person services.²⁹⁶ Other services are not digitalised, hence no price information makes a distinction between different ways of accessing them, although appointments can be made online for some services such as cadastre services and obtaining passports/ID cards.

Considering basic procedural information on accessing services, not all service providers publish complete information (description of the service, information on where and how to obtain it, as well as any possible forms for download).²⁹⁷ As identified in baseline monitoring, descriptions are available for the entire sample of services, as well as information on the location or steps for accessing the service digitally, if applicable. But omissions to disclose working hours of branch offices, generic descriptions of the jurisdictions,²⁹⁸ as well as missing forms for download, remain present in the case of MoI services. To illustrate the case of vehicle registration, the contact section of MoI website lists the relevant information for organisational units, but without working hours²⁹⁹ and a single form necessary for vehicle registration is not available for download.

Citizens can additionally face difficulties finding user-friendly guidance to help them throughout the administrative procedure. Step-by-step audio-visual material was found for three services: property registration, company registration, and VAT declaration and payment. The MoI, as the body responsible for vehicle registration services and issuing passports and ID cards (which together represent some of the most frequently used administrative services in Serbia), lacks a more user-centred approach. On the other hand, a particularly positive example is the citizen-friendly guidance on how to register property. The homepage of RGA website contains a banner redirecting the user to a designated webpage for property registration ([upisnepokretnosti.rs](https://www.upisnepokretnosti.rs)), as part of a bilateral support project. The page contains citizen-friendly content, among others an animated video explaining steps in property registration.³⁰⁰ Reference to this page is however lacking on individual pages of RGA website that specifically describe property registration services.

The indicator further examined whether service providers publish information in machine readable format. Despite the legal requirements for open data,³⁰¹ no such practice was identified in the case of five sampled services, neither on the service providers' websites, nor the national Open Data Portal.

Overall, Serbia advanced on the indicator value scale since the baseline monitoring, mainly because business registration was made available online (for LLC entities), and because of identified improvements in information provision on property registration services – citizen-friendly guidance on how to register property and available forms for download.

296 Business Registers Agency, "Fees", apr.gov.rs, <https://tinyurl.com/yb483rrg> (last accessed on 8 June 2021).

297 To award points, as minimum procedural information is considered: 1) Description of the service(s); 2) Where and how to obtain it. If physical location – address, working hours and similar; if fully or partially provided online – information on the necessary steps to be taken, such as creation of user account and if any software needs to be installed/used. Contact information such as phone numbers, or mail addresses are not considered under this element; 3) Original forms (incl. downloadable files or online forms).

298 For example, at the time of monitoring, the MoI website section that deals with vehicle registration stated that citizens "must apply with relevant authority, organizational unit of the Ministry of the Interior, territorially competent according to the residence of the owner of the vehicle, i.e., the seat if the owner of the vehicle is a legal entity".

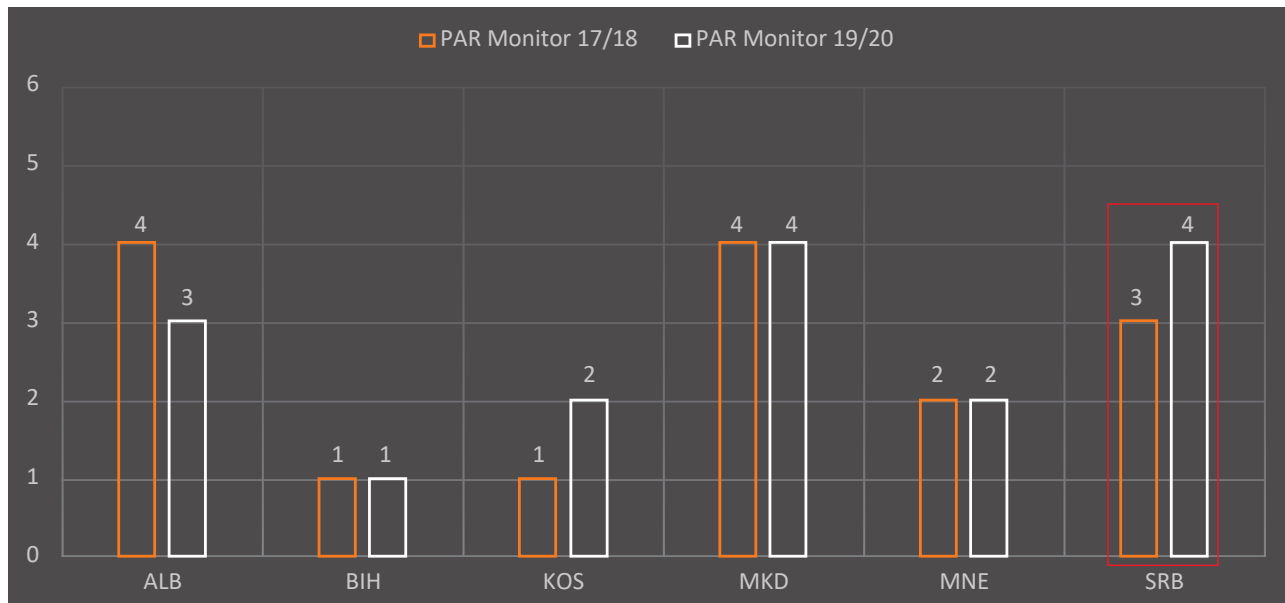
299 Available at <https://bit.ly/33u46Jh> (last accessed on 8 June 2021).

300 eCounter for Real Estate, "How to register property"? 6.1.2020, <https://bit.ly/3fF0RRK> (last accessed on 8 June 2021).

301 Article 27, Law on eGovernment, Official Gazette RS no. 27/2018-25, <https://bit.ly/3x371UL> (last accessed on 8 June 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 20: Indicator SD_P4_I2: Availability of information regarding the provision of administrative services on the websites of service providers



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

VI.5 SUMMARY RESULTS IN THE SERVICE DELIVERY AREA

Results of the public perception survey point to an overall increased satisfaction of citizens with the services of the state administration, compared to the same survey conducted during the 2017/2018 monitoring cycle. Notable finding, on the other hand, is that citizens who interacted with the administration in the past two years tend to have somewhat less positive perception compared to the total population.

Most citizens recognise government efforts to simplify administrative procedures and believe that such efforts lead to improved service delivery. They find that contact with the administration has become easier in the past two years and that they need less time to complete an administrative procedure. Digitalization of the work of the administration and its services is also becoming more visible: most citizens are aware of e-services and have used them. Conversely, more than a third of citizens are not informed about availability of digital services, and two out of five citizens who know how to use them, claim that they have used them rarely or not at all in the previous two years.

A significant majority of the population believe they can provide feedback on the quality of individual service they use, while two out of five citizens either see no such possibility or do not have a clear opinion. Feedback mechanisms are used, yet to a limited extent: among those who recognize the existence of feedback channels, more than a half have either not used them in the past two years or find them too difficult to use. In parallel, providers of administrative services are insufficiently transparent about the received feedback. Even in rare cases when they conduct a satisfaction survey, there is usually no publication of any reports or analysis.

As in the PAR Monitor 2017/2018, negative opinion dominates the perception of civil society. Slow improvement of access to services for people with disabilities and the socially disadvantaged population remains one of the rooted problems in service delivery. CSOs believe that the providers of administrative services are inadequately territorially distributed and that one-stop shops that are being established throughout Serbia are not accessible to everyone. Their further discontent derives from service provision that disregards individual needs of vulnerable groups and civil servants that are not well trained on how to serve persons with disabilities. Somewhat more positive opinion regards the variety of channels for accessing services (e.g., in person, digitally) but most CSOs maintain that digital channels are not easily accessible.

Finally, information provision on administrative services saw an overall improvement compared to the baseline, but the practices of publishing necessary information for obtaining a service still varies depending on the type of information and the responsible service provider. On the one hand, users of sampled services can easily find details on who to contact to inquire about specific services, what documentation needs to be submitted and what the fee prices are. On the other hand, complete, up-to-date and basic procedural information on how to obtain a service can still be improved, whereas citizen-friendly guidance remains sporadic despite some identified improvements, such as in the case of property registration. Notwithstanding growing digitalisation efforts and the number of services offered through the eGovernment Portal, monitoring found deficiencies in providing fully digitalised services, from request to receipt.

VI.6 RECOMMENDATIONS FOR SERVICE DELIVERY

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2108

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. The Government should adopt an overall, comprehensive policy framework proclaiming the vision of service delivery policy and its mid-term goals. By addressing all relevant dimensions, including but not limiting to territorial distribution of services, accessibility, institutional coverage, quality management and assurance, user education, awareness raising, and digitalisation, the policy framework would contribute to more focused service delivery policy (re)design. Long-term, it would serve the purpose of a higher and more uniform quality of services across the country territory and ensure better targeting of users' needs.	Partially implemented	Current policy framework for service delivery is comprehensive, but not covered by a single document (see more in the State of Play of this chapter). All relevant strategies, and most of all the PAR Strategy and the eGovernment Development Programme, create a framework for service delivery, but none takes the overall perspective and responsibility for this area. The PAR Strategy 2021-2030 is the most comprehensive, and its Action Plan 2021-2025 covers the recommended aspects: territorial distribution of services and accessibility (activity 5.3.8), quality management and assurance (activities 5.2.13, 5.2.14, 5.3.12, 5.3.13), user education and awareness raising (activities 5.1.3, 5.1.13), digitalisation (activities 5.1.4, 5.1.6, 5.1.10).
2. The Government should assign central authority for the entire service delivery policy to a single institution, ideally at the centre-of-government level. Such an institution would be in charge of designing and monitoring all aspects of service delivery policy, regardless of the channels of provision, and would engage the various relevant government institutions responsible for specific dimensions or sectors of service delivery.	Initiated	Such institution has not been formed. The government plans to establish an independent body or agency for external monitoring, control, and management of service quality. According to the AP PAR Strategy, initiation of such an institution is expected in 2023 ³⁰² and its formation is expected in 2025. ³⁰³ It is not clear if this institution will have authority for service design or how it would cooperate with relevant government institutions.
3. The Government needs to further steer the service delivery towards a one-stop-shop system that includes as many obtainable services as possible in one place (online or physical). One-stop-shops, existing ones or new, should allow not only for obtaining information on different services, but also fully completing them, from initiating request to payment. They should also incorporate direct user feedback on the quality of the service.	Initiated	The Government has not adopted the decree on one-stop shops, failing to meet the deadline set by the LGAP (art. 42 (6) and 212). Meanwhile, 14 physical one-stop shops have been established in municipalities across Serbia through calls for funding from the state budget (see more in the State of Play of this chapter). The new PARS AP 2021-2025 envisages continuation of this practice. ³⁰⁴ In parallel, the PPS is working on administrative simplification and digitalisation of services for businesses, some of which turn into electronic one-stop shops where the complete administrative procedure can be finalised through a single electronic channel. PPS plans to design 20 administrative services for businesses, applying the business episode model, which will be digitalised and made available to end users through the e-Government Portal. ³⁰⁵ It is not clear how user feedback collection would be incorporated in these plans.

302 Activity 5.3.12 "Drafting recommendations and creating the legal framework for the establishment of an independent body or agency for external monitoring, control and management of service quality".

303 Activity 5.3.13 "Establishing an independent body or agency for external monitoring, control and management of service quality".

304 Activity 5.2.12 PAR Strategy Action Plan.

305 Activity 5.1.10 PAR Strategy Action Plan.

<p>4. The Office for Information Technologies and E-Government needs to further promote the E-government portal, reaching out to as many users as possible, through traditional and digital media and any other available channels.</p>	<p>Fully implemented</p>	<p>Starting from 2019, the Office for IT and eGovernment has intensified its promotional activities. It actively uses four social media channels, out of which it started using Instagram (as one of the fastest growing social media platform) in 2019.³⁰⁶ Its YouTube channel published 34 videos since the previous monitoring, indicating regular promotional activity.³⁰⁷ Following the outbreak of the COVID-19 pandemic and the creation of various new digital services, for example the application for PCR testing or vaccination, the portal has been widely promoted through traditional and digital media.</p>
<p>5. The Office should also set standards and advise individual service providers in the administration on how to promote and present the e-services offered on their webpages and how to establish clearly visible links to the E-government portal.</p>	<p>Partially implemented</p>	<p>In December 2018, the Government adopted the bylaw regulating web pages of public bodies. Bodies are thus obliged to designate a separate section on their webpage titled "Services" and list all services they provide. Bodies are also obliged to publish services at the eGovernment Portal, and after doing so, add a link on their webpage within the special "Services" section. In terms of the compliance, bodies have to self-assess the compliance of their website with the standards set by the decree, while the Office for IT and eGovernment has to report results to the Government. No such reports are publicly available, however. There is no data on how the Office advises individual institutions and help mitigate shortcomings. Guidelines for developing web pages of bodies are archived on the Office website and have not been updated since 2014.³⁰⁸</p>
<p>6. The Office should support enhanced user experience of the E-government portal. As the websites can leave a strong impression on visitors, i.e. potential service users, implementing more responsive web design with optimal navigation experience can largely affect the reduction of bounce rate, or simply relieve time and effort spent at the E-government portal, resulting in increased e-services usage rates. Focus should be on ease of use and a minimum burden on the user (in terms of software download, etc.).</p>	<p>Partially implemented</p>	<p>The portal has been redesigned and re-launched at the beginning of 2020. With a more modern design and new features, it allows for easier navigation and it is more user friendly. Among the new features, it organises information and services according to life events, and it introduced two-factor authentication (see more in the State of Play section of this chapter) in addition to signing in with username/password and qualified electronic certificate. Some services (such as those provided by the Mol) can only be accessed with the digital certificate, which still requires hardware such as USB or smart cards to be used. The portal lacks more visual guidance and user-friendly features, such as mapping the entire user journey through the service.</p>
<p>7. Service providers' websites and the E-government portal should ensure feedback channels for users as a standard practice. Apart from the existing feedback options, such as rating a service at the E-government portal, 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.</p>	<p>No action taken</p>	<p>As pointed out in this PAR Monitor, the redesigned eGovernment Portal omits displaying users' comments and ratings of individual services, which had existed under frequently used services on the old version of the portal. The new portal does not allow users the option to leave comments, rate services, or see other reviews. Some institutions (such as the Tax Administration or the Directorate for Measures and Precious Metals) survey users through their webpages, but this is not a standard practice across the administration. Previous AP PAR 2018-2020 envisaged conducting "surveys of satisfaction, requirements and expectations with respect to quality of public services" as one of the activities, but it has not been completed. The new AP PAR 2021-2025 envisages designing a methodology for measuring the satisfaction of end users with the public service delivery in 2022 (activity 5.3.9) and measuring users' satisfaction in 2023 (activity 5.3.11).³⁰⁹</p>
<p>8. Public administration service providers should proactively publish feedback results and data to the public, at least through their websites. Either raw or processed and analysed feedback data should be made available to the public. Public availability of feedback will in turn serve to increase the accountability for and transparency of service provision.</p>	<p>No action taken</p>	<p>As pointed out in this PAR Monitor, user satisfaction survey data was found only for the service of business registration in Serbia, out of the 5 services in the sample. Some other institutions display results of user satisfaction surveys, such as the Institute for Public Health or the Statistical Office of the Republic of Serbia. On the other hand, the Tax Administration does not publish the results although it surveys its users. The practice is not uniform across the administration, and it relies on proactivity and transparency of individual institutions. Overall, the practice has not changed since the previous monitoring cycle.³¹⁰</p>

306 Available at <https://www.instagram.com/kancelarijajte/> (last accessed on 9 June 2021).

307 Available at <https://www.youtube.com/user/euprava> (last accessed on 9 June 2021).

308 Decree on detailed conditions for creating and maintaining web presentations of bodies, Official Gazette RS no. 104/2018-10.

309 Sources: Tax Administration, <https://bit.ly/2URVIRj>; Directorate for Measures and Precious Metals, <https://bit.ly/3hkDX40>; PAR Strategy 2021-2030, p. 148; MPALSG, Online Monitoring Tool - <https://bit.ly/3ya4sRe> (last accessed on 17 June 2021).

310 Sources: Institute for Public Health of Serbia, <http://www.batut.org.rs/index.php?content=2142>, and the Statistical Office of the Republic of Serbia, <https://www.stat.gov.rs/media/4921/rezultati-istraganja-o-zadovoljstvu-korisnika-2019.pdf> (last accessed on 9 June 2021).

9. 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.	No action taken	As there is little collection and reporting on user feedback, no change was identified in terms of whether service providers report on the way in which collected feedback was used for service improvement. ³¹¹
10. 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.	No action taken	This recommendation relates to advanced, proactive user engagement techniques. No evidence of change compared to the baseline was found on the systemic level nor in case of the five sampled services used in this chapter. There is yet no system of developing user-oriented services through the recognition of real needs of users. The new PAR Strategy envisages designing a methodology for developing services based on a systematic involvement of end users through the use of advanced and innovative tools.
11. Accessibility should be clearly addressed as one of the cornerstones in service delivery policy. Measures for comprehensively approaching accessibility and vulnerability issues should constitute a pillar of the overall service delivery policy orientation of the country (through a comprehensive policy framework proposed in recommendation 1 above).	Partially implemented	The new PAR Strategy 2021-2030 highlights the importance of ensuring accessibility of physical one-stop shops for vulnerable groups (p.153). But no specific objective of the strategy tackles the accessibility issue per se. PAR Action Plan 2021-2025 covers territorial distribution of services and accessibility in two activities (5.2.8 and 5.3.8). Apart from that, the decree regulating closer conditions for creating and maintaining web pages of public bodies prescribes webpage accessibility standards in article 5. Serbia developed the Strategy for Improving the Position of Persons with Disabilities, with accessibility as one of the strategic goals. The E-government Development Programme states that it relies on the principle of inclusiveness and accessibility.
12. Approach to accessibility and vulnerability issues should be strategic and holistic, addressing different dimensions and groups, including but not limited to sensory, intellectual and physical disabilities, but also to as many vulnerable groups as possible such as the elderly, illiterate, socio-economically deprived, minority groups, etc. Based on the identification of needs of people with disabilities and vulnerable groups in the country, a step-by-step and needs-based approach should be defined and implemented, clearing a path over time towards smooth service reception and elimination of discrimination.	N/A	There is no available data for the assessment of this recommendation. In March 2020, the Government has adopted the Strategy for the Improvement of Position of Persons with Disabilities, ³¹² which emphasizes the need to overcome problems of lack of statistical data on persons with disabilities, including classification by types of disabilities and the need to address all types of disabilities in the further measures.
13. As part of the accessibility measures, civil servants in charge for delivery of in-person administrative service should undergo mandatory training courses for communication with and assistance to people with disabilities and other vulnerable groups. Such training schemes should be considered a part of an obligatory professional development programme of the National Academy for Public Administration, covering all service delivery institutions in all municipalities and cities in Serbia.	Initiated	There has been no change in practice since the baseline monitoring. Annual training programmes for civil servants, developed by the National Academy of Public Administration, have not foreseen trainings with this specific orientation. A recent improvement is reflected in the AP PAR 2021-2025, in which activity 5.2.8 envisages "Development and implementation of training programs for employees who are in direct contact with service users (with special focus on the provision of services to persons with disabilities, users with special needs, vulnerable users, marginalized users)". The planned start of this activity is the third quarter of 2022.

311 PAR Strategy 2021-2030, p. 143 and 261.

312 Available at <https://bit.ly/3gIYfub> (last accessed on 9 June 2021).

<p>14. Service providers should start using citizen-friendly ways of informing citizens online. Using multi-media contents, easy to understand tutorials and brochures, innovative mechanisms for communicating basic, but crucial information on services, citizens' rights and obligations, and service fees, should fully replace dry, bureaucratic descriptions of basic information.</p>	<p>Initiated</p>	<p>Lack of clarity and availability of information on services remains a problem.³¹³ Users of services highlight insufficient or unclear instructions, difficulty to obtain information if they do not know the exact official name of the procedure, and a lack of information on deadlines.³¹⁴ The newly adopted Law on the Register of Administrative Procedures prescribes the principle of simplicity, meaning that all information on procedures has to be announced in a simple and clear way so that it is comprehensible to any user. There is no prescription, however, regarding citizen-friendly (visual, multi-media) elements of service information. As pointed out in this PAR Monitor, citizen-friendly guidance was identified in the case of three out of five sampled services: property registration, company registration, and VAT declaration and payment.</p>
<p>15. Service providers should ensure that information disclosed at their websites is as quickly as possible updated on the eGovernment portal once the changes occur, especially in cases of website reconstructions.</p> <p>16. The Office for IT and eGovernment (OITE) should perform quality assurance for the websites of major service providers in the country. This way, conflicting information will be avoided in support of predictability and trust in online service delivery.</p>	<p>Partially implemented</p>	<p>The decree regulating the eGovernment portal to some extent regulates mutual harmonisation between the portal and the individual webpages of bodies. Service providers are responsible for the services that they publish on the portal. After publishing, bodies are obliged to add the corresponding link to their own webpage, in the section "services". This means that the original web location for e-services is the portal, while individual webpages have to be harmonised with the content published on the portal. Bodies control whether services are up to date and they should make all the necessary changes and inform the Office for IT and eGovernment about them. However, the decree does not define when this information forwarding should happen at the latest. In addition, no data is available as to how the bodies adhere to this decree in practice.</p> <p>Bodies are obliged to self-assess compliance of their website with the decree on webpages of public authorities, at least once annually, and report the results to the Office for IT and eGovernment. For self-assessment, bodies use a special software solution, therefore it is not possible to determine whether they specifically assess harmonisation between content published at the eGovernment portal and that published on their webpages. The Office is obliged to report on the compliance results to the government and to the public, but such reports are not publicly available.³¹⁵</p>

313 Sources: PAR Strategy, p. 156; Regulatory impact assessment for Draft Law on the Register of Administrative Procedures.

314 Sources: PAR Strategy 2021-2030, p. 156; Regulatory impact assessment for Draft Law on the Register of Administrative Procedures, eGovernment Development Programme, p. 25; Art. 5, of the Law on the Register of Administrative Procedures, Official Gazette No. 44/2021-9.

315 Decree on the manner of keeping the Metaregister, the manner of approving, suspending and revoking access to the Government Service Bus and the manner of work on the eGovernment Portal, Official Gazette RS no. 104 / 2018-6.

PAR MONITOR 2019/2020 RECOMMENDATIONS

A certain number of the recommendations from the 2017/2018 PAR Monitor, still relevant in this monitoring cycle, is 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 2017/2018

1. One-stop-shops, existing ones or new, 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, 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 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.
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 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.

New recommendations 2019/2020

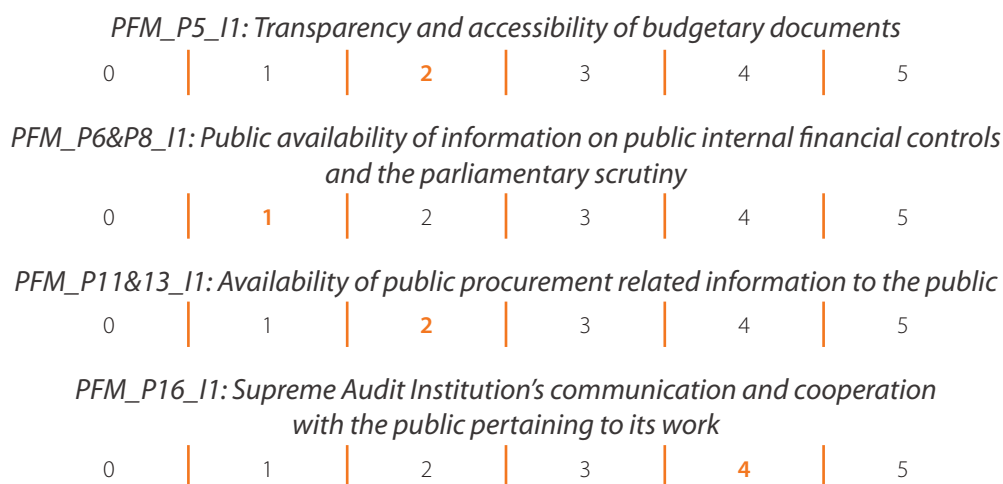
6. The decree regulating webpages of public authorities should prescribe an obligation to incorporate user feedback channels within the "Services" section of webpages and promote such channels on the homepage banners.
7. Independent agency for monitoring, control and management of service quality, planned 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.
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.
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.
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.
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.
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.
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.

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.
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.

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 2018

■ Budget transparency

The Ministry of Finance in Serbia (MoF) reports that budget transparency has in recent years increased as the result of better alignment of budget users' programme structure with the programme budget guidelines (from 61% in 2016 to 87% in 2019), introduction of gender-responsible budgeting, but also due to regular, annual publishing of citizen guide through the budget (published also by a number of local self-government units – 35% in 2019).³¹⁶ In addition, as one of the key transparency-related results³¹⁷ at the end of 2018 was introduction of the legal obligation of budget users to publicly release programme information and to report on budgetary performance on their websites. Draft PFM Reform Programme for 2021-2025 does not explicitly target transparency of budget documents and data towards the public and other stakeholders as a separate objective or measure.

The last EC report on Serbia's progress from 2020 takes note of the fact that final accounts of the budget are adopted after years of non-compliance with the Budget System Law (BSL).³¹⁸ The National Assembly passed the laws on final accounts of the budget for 2002-2018 in December 2019, and in the subsequent year for the 2019 budget. However, the EC report also concludes that there was no progress in budget transparency as some of the key budgetary documents need to be produced and published, such as transparency roadmap, a pre-budget statement, and a mid-year execution report.³¹⁹ Importantly, it is highlighted that there is a need to improve public participation in budgetary process, as well as oversight by the National Assembly.

The Open Budget Survey (OBS) results for Serbia from 2019 are of the similar assessment as the EC, and budget transparency score has slightly decreased since 2017 (from 43 out of 100 in 2017, to 40 in 2019). As the priority actions to improve budget transparency, the OBS recommends publishing mid-year budget review, pre-budget statement and year-end report online and timely, but also greater promotion of the citizen guide through budget, and identification of the public's needs in terms of its content. Currently, Serbia's OBS overall ranking is 70 out of 117 countries, including all dimensions – budget transparency, public participation, and budget oversight.

316 Report on the implementation of the Public Finance Management Reform Programme 2016-2020 for the period January – December 2019, p. 9, available at: <https://www.mfin.gov.rs/dokumenti2/program-reforme-upravljanja-javnim-finansijama-pfm> (last accessed on 3 June 2021), and Draft Public Finance Management Reform Programme for 2021-2025, p. 28, available at: https://www.mfin.gov.rs/upload/media/uVPoa7_6061df8c02b27.pdf (last accessed on June 2021).

317 European Commission, Serbia 2020 Report, p. 15, available at: <https://bit.ly/3x0DPxJ> (last accessed on 4 June 2021).

318 In addition, the EC report cites that the Ministry of Finance does not publish the budget execution profile at the beginning of the year. Ibid, p. 16.

319 Open Budget Survey Serbia 2019, available at: <https://www.internationalbudget.org/open-budget-survey/country-results/2019/serbia> (last accessed on 3 June 2021).

■ Public internal financial control (PIFC)

Central Harmonisation Unit's 2019 annual report on PIFC informs on the recent progress in this area and takes stock of implemented recommendations for improvement. For instance, it is said that 95% of EC's recommendations on PIFC, as part of the Chapter 32 progress, has been implemented, and 60% of those stated in the CHU's 2018 annual report.³²⁰ CHU's analysis indicates that central-level budget users have improved the state of financial management and control (FMC), and that significant percentage of the most important institutions and state-owned enterprises (SOE) report on financial management and control (FMC).³²¹ The same reports also informs that over 80% of budget users from the central government level, social security organisations, autonomous province of Vojvodina, cities and SOEs have functional internal audit in place.³²² When it comes to external transparency, the CHU assesses that there is a high level of transparency of key FMC documents for the central-level institutions, without further specification (see findings on FMC transparency by ministries in section *WeBER monitoring results*).

On the other hand, the EC is of the opinion that capacities for implementing FMC need to be enhanced and notes that requirements to establish internal audit units is not observed by all budget users that are required to do so, and that staff is lacking.³²³ At the same time, the EC recognises CHU's efforts in developing the PIFC system, in improving annual reporting, conducting internal audit quality reviews, and initiating the same for FMC. What is also highlighted is that "*the Government included, for the first time, mandatory instructions to ministries to act upon recommendations provided in the 2018 consolidated annual report which was adopted in September 2019.*"³²⁴

■ Public procurement transparency

In 2019, public procurement policy has undergone major legal and policy changes – the new Public Procurement Law (PPL) was passed, and the Public Procurement Development Programme for 2019-2023, with accompanying the two-year action plan, was adopted. Among other novelties, these changes have brought about electronic communication in public procurement procedures as one of the most important transparency features. According to the new PPL, all communication and data exchange in public procurement procedures is electronic, via public procurement portal.³²⁵ All the procedures that started after 1 July 2020 are managed through the new public procurement portal. According to the Public Procurement Development Programme, IT infrastructure that supports electronic communication on the portal should enable easy and transparent data and documents all phases of procedures.³²⁶

The EC reflects on the main legislative and policy developments and considers PPL as a positive additional step towards full alignment with the EU acquis.³²⁷ The EC voiced a concern though on the possibility for the legal framework to be suspended through the special law on linear infrastructure projects, if the Government decides to select strategic partners in urgent matters, stating also that publishing "*all procurement information related to procurement conducted in relation to COVID-19 on government portals would also contribute to enhanced transparency and trust.*"³²⁸ Reflecting on the e-procurement practices, EC observed good progress with the introduction of a new, publicly available, public procurement portal and obligatory electronic communication and exchange of public procurement data.³²⁹

320 Consolidated Annual Report for 2019 on the state of Public Internal Financial Control in Public Sector, p. 4, available at: <https://www.mfin.gov.rs/o-ministarstvuu/dokumenti3> (last accessed on 4 June 2021).

321 According to the CHU's consolidated report for 2019, total expenditures and expenses of budget users covered by the report account for close to 87% of the total state budget expenditures for 2019, Ibid, p. 3.

322 Ibid, p. 4.

323 European Commission, Serbia 2020 Report, p. 117-118.

324 Ibid, p. 118.

325 Art. 45 of the Public Procurement Law, Official Gazette, no 91/2019, available at: <https://bit.ly/3chweD4> (last accessed on 4 June 2021).

326 Public Procurement Development Strategy 2019-2023, Official Gazette no. 82/2019, p. 20 available at: <https://bit.ly/2RpjlxC> (last accessed on 4 June 2021).

327 Ibid, p. 73.

328 Ibid, p. 73-74.

329 Ibid, p. 74.

External communication of the external audit

State Audit Institution (SAI) prioritises external communication in its Strategic Plan for 2019-2023 with clearly dedicated specific objective to strengthen partnerships with key stakeholders (see more in the section *WeBER monitoring results*).³³⁰ SAI's annual activity reports provide additional details on cooperation with legislature - committee for finance, state budget and control of spending of public funds, and subcommittee for review of SAI's reports - but also with auditees, media outlets, citizens, and other state bodies.³³¹ Also, SAI has published registry of recommendations issued in 2019 to audited institutions, with recommendations' status, type of audit, and level of priority.³³² It remains to be seen whether the SAI will carry on with this practice in the future.

The EC recognised the improved communication and cooperation of the SAI with the stakeholders, and increased activities in the media, but also highlights that the SAI's annual activity reports was for the first time discussed at the plenary parliamentary session in 2019, and that the National Assembly issued conclusion recommending to the Government to ensure implementation of the SAI recommendations.³³³ In 2020, the National Assembly reviewed annual activity report of the SAI too.³³⁴

From the viewpoint of the communication towards the public it is noteworthy that the SAI has recently accelerated its performance audit work – number of performance audits in 2019 was 12, and at the time of writing this report in 2021, there was 13 performance audit reports published at the SAI website.³³⁵ The increased focus on the performance, besides compliance, of budget beneficiaries is an important development in the work of SAI given the value of this type of audit work in safeguarding public interest in budget spending. The EC also highlights that, since 2019, SAI publishes response to audit reports, as well as post-audit reports (*for citizen friendly versions of audit reports see section WeBER monitoring results*).³³⁶

Finally, the OBS for Serbia sees limited opportunities for public participation in budget process, and inter alia recommends that the legislative committee of the National Assembly, as part of the budget oversight function, examine the audit of the final budget accounts and publish report with findings online, but also suggests that the SAI establish formal mechanism for the involvement of public in audit planning.³³⁷

330 Strategic Plan of the State Audit Institution for period 2019 – 2023, available at: <http://dri.rs/documents/strategic-plan.180.html> (last accessed on 1 June 2021).

331 Supreme Audit Institution, available at: <http://dri.rs/dokumenti/godisnji-izvestaji-o-radu.93.html> (last accessed on 4 June 2021).

332 Available at: <http://dri.rs/revizije/registar-preporuka/registar-preporuka.490.html> (last accessed on 4 June 2021).

333 European Commission, Serbia 2020 Report, p. 118.

334 The National Assembly, available at: <https://bit.ly/3z1AOyU> (last accessed on 4 June 2021).

335 Supreme Audit Institution, available at: <http://dri.rs/revizije/izvestaji-o-reviziji.136.html> (last accessed on 4 June 2021).

336 European Commission, Serbia 2020 Report, p. 118.

337 Open Budget Survey Serbia 2019.

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's 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, and 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.

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 serves for the measurement of the regularity of parliamentary scrutiny of PIFC.

In the external audit area, the indicator approach considers SAI's external communication and cooperation practices with the public. This area covers 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

WeBER indicator PFM_P5_I1: Transparency and accessibility of budgetary documents

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Enacted annual budget is easily accessible online	4/4	4/4
E.2 In-year budget execution reports are easily accessible online	2/4	2/4
E.3 Mid-year budget execution reports are easily accessible online	0/4	0/4
E.4 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
E.5 Annual year-end report contains non-financial information about the performance of the Government	0/2	0/2
E.6 Official reader-friendly presentation of the annual budget (Citizen Budget) is regularly published online	4/4	4/4
E.7 Budgetary data is published in open data format	2/2	2/2
Total score	12/24	12/24
Indicator value (scale 0 – 5)³³⁸	2	2

On the budget transparency, there was no change in the assessment for Serbia compared to the baseline PAR Monitor 2017/2018. Laws on budgets of Serbia, prepared by the Government and enacted by the National Assembly for each fiscal year, are easily accessible at the webpage of the MoF. This marks a continuation of practice of making budget laws accessible since the baseline monitoring, measured by the number of clicks it takes for visitors to find them (maximum three clicks). Unlike in the baseline monitoring cycle, current state budget at the time of monitoring – Law on Budget for 2020, was not made available immediately from the homepage of the MoF website but from the section for legislation. Previously adopted annual budget laws are stored in the archive of legal acts under the *Budget and Public Debt* heading, from 2002 to the present, and some of them are accompanied with documents such as justifications of laws, programme information, or review of budgets for policy sectors.³³⁹ Despite little effort needed to access laws on budget when measured by the number of clicks from the homepage, public would benefit from more prominent and consistent presentation of budget laws within a single, featured location on the MoF website as a source of information.

In-year budget reporting practices by the MoF remain intact as well. Monthly Public Finance Bulletins are available and easy to access under *Publications* section, and mid-year budget execution reports are still not publicly disclosed. Public Finance bulletins inform monthly on macroeconomic and fiscal developments, and public debt, but also give consolidated view for different government levels – central, provincial, and local.³⁴⁰

338 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.

339 Ministry of Finance, available at: <https://mfin.gov.rs/arhiva/arhiva-zakona-budzet-i-javni-dug> (last accessed on 26 May 2021).

340 Available at: <https://mfin.gov.rs/aktivnosti/bilten-javnih-finansija> (last accessed on 26 May 2021).

Still, their publication was not fully regular or predictable, as noted in the baseline PAR monitor, and the last bulletin available at the time of monitoring in November 2020 was for August which resulted in assessing monthly reporting only partially accessible (i.e., not covering 6-month period observed). On the other hand, no developments are recorded in transparency of mid-year budget reports. The Budget System Law (BSL) obliges the MoF to regularly follow budget execution and to report to the Government, who reports to the National Assembly twice a year for period of 6 and 9 months,³⁴¹ but neither the MoF nor the Government made these reports broadly publicly available in the meantime as there is no such obligation.³⁴²

When it comes to types of expenditure information provided in the budget execution report, situation remains fairly the same as in the baseline PAR Monitor. Out of the all types of budget classifications according to the BSL, available monthly in-year reports fully display only economic expenditure data broken down per government levels, including mandatory social security organisations.³⁴³ As the level of detail for mid-year reporting could not be assessed, in-year budget reporting overall remains focused on economic expenditures, with insufficient transparency per budget organisations and sectors (or government functions). When it comes to year-end reporting, it should be noted that report for 2018 (Law on the Final Account of the 2018 Budget) was the last available at the time of monitoring, and it presented all the expenditure data required by the indicator element – economic, organisational (per central government institutions, budgetary funds, and administrative districts) as well as functional.

Major turn with regards to transparency of annual reporting since the baseline PAR Monitor was that the Government submitted to the National Assembly in 2019 law proposals on the final account of the budget from 2002 to 2018, which were all passed in December that year.³⁴⁴ With such move, there was, firstly, a change in practice of unlawfully skipping parliamentary debate and approval of the annual budget implementation over the years, and secondly, these overdue laws on final accounts have been made publicly available (together with their mandatory elements including reports on budget execution, capital expenditures, budget reserve, state guarantees, explanation of variations etc.).³⁴⁵ Following this development, the Assembly has also passed the Law on Final Account for 2019 Budget in December 2020, suggesting that the legal obligations will be observed going forward. Nevertheless, despite being noteworthy development in terms of law compliance and general budget transparency, enactment of laws on final accounts did not influence WeBER assessment in this cycle since budget spending data is observed for in-year and year-end reporting cumulatively.

That said, as in the baseline PAR Monitor, there was no evidence that year-end reports contained any non-financial performance information of the Government, i.e., budgetary policy outputs or outcomes. It should be noted that the BSL stipulates that annual reports on programme budget performance are mandatory part of the final account.³⁴⁶ In terms of budgetary performance, final accounts do offer explanations of major variations per budget programmes, against execution plans.

Since the baseline monitoring, Citizen Guides through Budget were continuously published and made easily accessible on the MoF webpage same as before. With refreshed design for the last few years, they communicate relatively simply main budget elements to the public – planned revenues, and expenses, and deficit, amounts of money allocated for policy sectors, budget structure etc.³⁴⁷ As identified before, the current edition can be accessed already from the homepage - but it is still not a featured item as one needs to scroll down to the

341 Art. 76 of the Budget System Law, Official Gazette 54/2009-3, 73/2010-3, 101/2010-239, 101/2011-260, 93/2012-175, 62/2013-3, 63/2013-3 (corr.), 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, 149/2020-27

342 In the previous cycle, mid-year reports were available only from the National Assembly's website.

343 Article 29, Budget System Law. Budget classifications are defined as follow: 1) Economic classification of revenues and proceeds identifies revenues and proceeds according to regulations or contracts that determine the sources of revenues and proceeds; 2) Economic classification of expenditures and outflows identifies individual goods and services and executed transfer payments; 3) Organisational classification identifies expenditures and outflows according to budget beneficiaries, accompanied by allocation of appropriation among the beneficiaries; 4) Functional classification identifies expenditures and outflows according to their functional purpose for a certain area, and is independent from the organisation which performs such functions; 5) Program classification identifies classification of programs of budget beneficiaries; 6) Classification of expenditures and outflows according to sources of financing identifies revenues and proceeds, expenditures and outflows according to the generation of those funds.

344 All laws are available at the National Assembly's website: <http://www.parlament.gov.rs/akti/doneti-zakoni/u-sazivu-od-3-juna-2016.4242.html> (last accessed on 26 May 2021).

345 These mandatory parts of the final account defined by the article 79 of the BSL, and more closely regulated by the Minister, are in practice publicly disclosed as part of the law proposals of the final accounts submitted to the Assembly.

346 Article 79 of the BSL.

347 Citizen Budget for 2021 available at: <https://mf.gov.rs/dokumenti2/gradjanski-budzet> (last accessed on 26 May 2021).

bottom of the homepage - whereas older versions remain unintuitively stored, either in archive section or on other website pathways. For example, citizen budget for 2020, valid at the time of monitoring, is no longer easily found either in archive or elsewhere. At the moment, one can only access 2021 citizen budget from the homepage, or the 2019 one from the archive. Online presentation of citizen budgets is one in a few examples of how difficult to navigate the internet presentation of the MoF can be.

Finally, the MoF publishes regularly consolidated view of the macroeconomic and fiscal data for the entire state and other levels of government, as in the baseline PAR Monitor. This data is available in one of the machine-readable formats, free for use, and covers multi-annual timeframe, and is sufficient for scoring on open data element of this WeBER indicator.³⁴⁸ Nevertheless, these datasets are still not presented as open data at the website of the MoF, through a clearly visible open data label for instance, and the MoF does not officially publish data in open format at the national portal at the moment, unlike budgets for a number of local self-government units for 2020 and 2021.³⁴⁹ This proves for the second monitoring cycle in a row, there is a room for additional efforts in fully opening various kind of budgetary data for the central level. Even more so knowing that there is government-sponsored initiative to open budget plans of cities and municipalities in Serbia, that enables analysis, comparison, and re-use.³⁵⁰

Overall, there was no change in the indicator value for Serbia compared to the baseline PAR Monitor 2017/2018. Low transparency levels persist mostly due to budget reporting aspects – irregular or publicly absent in-year reporting, insufficiently transparent and detailed budget execution information, and no reporting on the Government's budget-related policy performance in different fields of significance for everyday life. As mentioned earlier, year-end budget transparency has factually increased between two monitoring cycles, due to recent compliance with the BSL on the parliamentary approval of the final accounts of budget, although with no impact on the final assessment of this indicator.

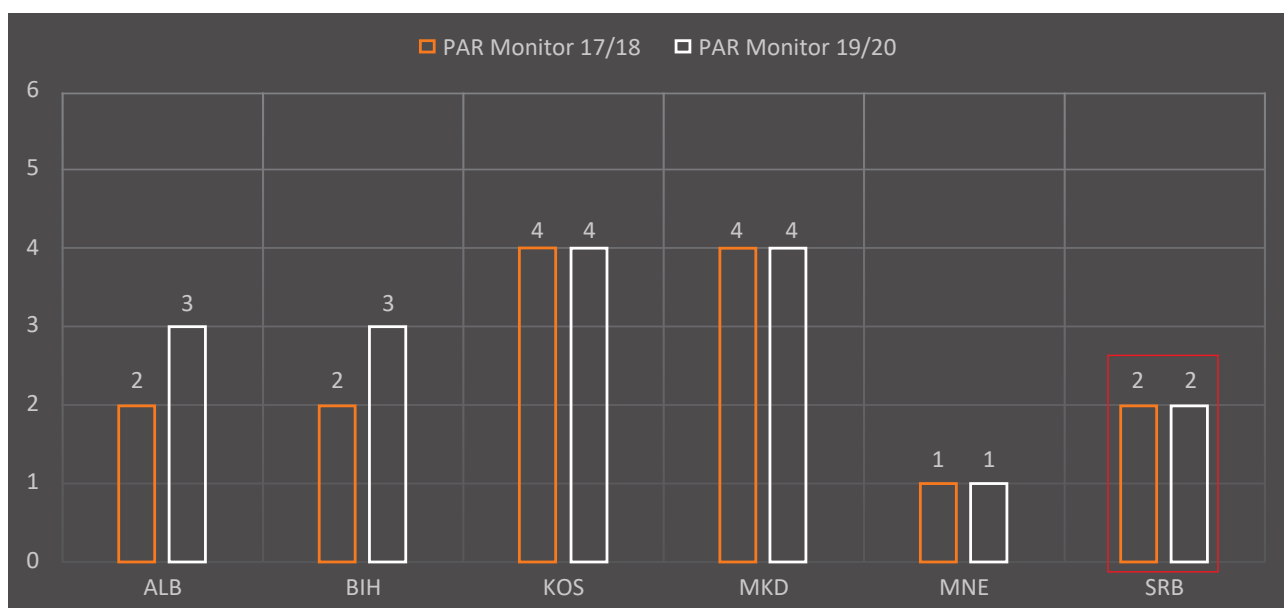
348 Available at: <https://mfin.gov.rs/dokumenti2/makroekonomski-i-fiskalni-podaci> (last accessed on 27 May 2021). For WeBER monitoring, publishing budgetary data in an open format considers the availability of dataset(s) that are: machine readable (CSV, XLS, XML, JSON, RDF, TXT, etc.), downloadable by different users, and free of charge.

349 Open Data Portal of the Government, available at: <https://data.gov.rs/sr/search/?q=%D0%B1%D1%83%D1%9F%D0%B5%D1%82> (last accessed on 27 May 2021).

350 available at: <https://budzeti.data.gov.rs/> (last accessed on 27 May 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 21: Indicator PFM_P5_I1: Transparency and accessibility of budgetary documents



Regional PAR Monitor reports with results for all WB administrations are 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

WeBER indicator PFM_P6&8_I1: Public availability of information on public internal financial controls and the parliamentary scrutiny

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 Consolidated annual report on PIFC is regularly produced and published online	2/4	2/4
E.2 Quality reviews of internal audit reports are regularly produced and published online	1/2	2/2
E.3 Ministries publish information related to financial management and control	0/2	0/2
E.4 CHU proactively engages with the public	0/2	0/2
E.5 The Parliament regularly deliberates on/reviews the consolidated report on PIFC	0/2	0/2
Total score	3/12	4/12
Indicator value (scale 0 – 5)³⁵¹	1	1

351 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.

Like the budget transparency indicator, there was no notable development in PIFC since the baseline monitoring cycle. As before, scores achieved pertain to the public reporting practices - on PIFC implementation in public sector, and on quality of internal audit implementation – though in both cases full regularity is not achieved yet.

Namely, the CHU of the MoF regularly produces and publishes consolidated reports on PIFC for over a decade. Commendably, the depth of analysis of reports has recently increased, with more data breakdown, progress reporting and recommendations monitoring.³⁵² Still, there is an ongoing tendency in making the annual report for previous year publicly available at the end of the current one, often in the last quarter. As the result, their publication is once again assessed as partially regular, with one annual report being publicly available at the time of monitoring in November 2020, for the last two calendar years observed. The BSL stipulates 31 March as the reporting deadline for budget users to submit their individual reports for the previous year to the MoF. No other schedule is set up, either for MoF's submission of consolidated report to the Government, or for its public release.³⁵³

When it comes to publishing internal audit quality reviews, the CHU has started publishing them in 2016 as noted in the baseline PAR Monitor, with reports for 2017 and 2019 being published subsequently.³⁵⁴ Lower assessment in comparison to the baseline monitoring, is due to partial regularity of publishing in this cycle, i.e., internal audit quality review for 2018 was missing, with the one for 2019 being publicly disclosed. Nevertheless, the 2019 report has a coverage from January 2018 to September 2019. Having as a sample ten budget users and their internal audit work, the report structure remained identical over the years, focusing on key elements of internal audit standards.³⁵⁵ At the same time, approach to producing these quality reviews remains highly formal and bureaucratic, with no action points or other items based on which a given report would be singled out, and there is little promotion if any. There is enough room to consider enhancing transparency of the CHU's work on internal audit improvement in the future, which would be beneficial from the standpoint of public interest.

Furthermore, there was no change in approach of ministries in Serbia when it comes to provision of information related to FMC on their websites. Resembling the baseline PAR Monitor, around a one third of them has disclosed information on risk registers, or maps of procedures/business process, or information on the appointed FMC manager.³⁵⁶ That said, only two ministries published more than one out three observed pieces of information of the importance for FMC. Hence, this monitoring cycle supports finding from the baseline monitoring that, as opposed to the central level CHU, ministries are much less proactive in releasing information on their PIFC policies, even in its basic form. It should be reiterated that the transparency of PIFC implementation is desirable from the perspective of governmental accountability in managing public finances but also as part of Serbia's EU accession obligations under the negotiation chapter on financial control.

When it comes to additional efforts in promoting PIFC, CHU did not practice proactive communication with the public during 2020.³⁵⁷ As opposed to the baseline PAR Monitor, when press releases and media appearances were occasionally used, there was no evidence that CHU used these or other means, such as production and promotion of booklets/leaflets, reader-friendly summaries of reports, events to involve non-state stakeholders, or social media. What is more, the dedicated online portal on PIFC was mostly outdated when monitoring was done and at the time of writing this report the website was defunct.³⁵⁸ Considering that 2020 was the year of the COVID-19 pandemic outbreak, which necessitated urgent responses in curbing consequences of

352 See PIFC Consolidated Report for 2019, available at: <https://www.mfin.gov.rs/o-ministarstvu/dokumenti3> (last accessed on 27 May 2021).

353 Articles 81 and 82, Budget System Law.

354 Internal audit quality reviews are available at: <https://www.mfin.gov.rs/o-ministarstvu/dokumenti/> (last accessed on 27 May 2021).

355 Report give an overview on the establishment of the internal audit units in selected budget beneficiaries, scope of the audit, qualifications and skills of internal auditors, functional and organisational independence of internal audit, internal audit charter and ethical code, familiarity with internal audit standards, strategic and annual internal audit plans, application of internal audit methodology, internal audit risk management, internal quality reviews, training needs, and membership in professional associations.

356 For the total number of 21 ministries, including three new ministries formed after parliamentary elections in June 2020 which had no websites at the time of monitoring in November of the same year. These ministries are the Ministry for Human and Minority Rights and Social Dialogue, the Ministry for Family Care and Demography and the Ministry for Care of Village. Ministries without portfolio are not considered for this element.

357 According to the WeBER methodology, analysis of the CHU's proactivity in communicating with the public is done for the year in which this indicator element is measured if measurement is performed in the second half of the year. If it is performed in the first half of the year, preceding year is observed.

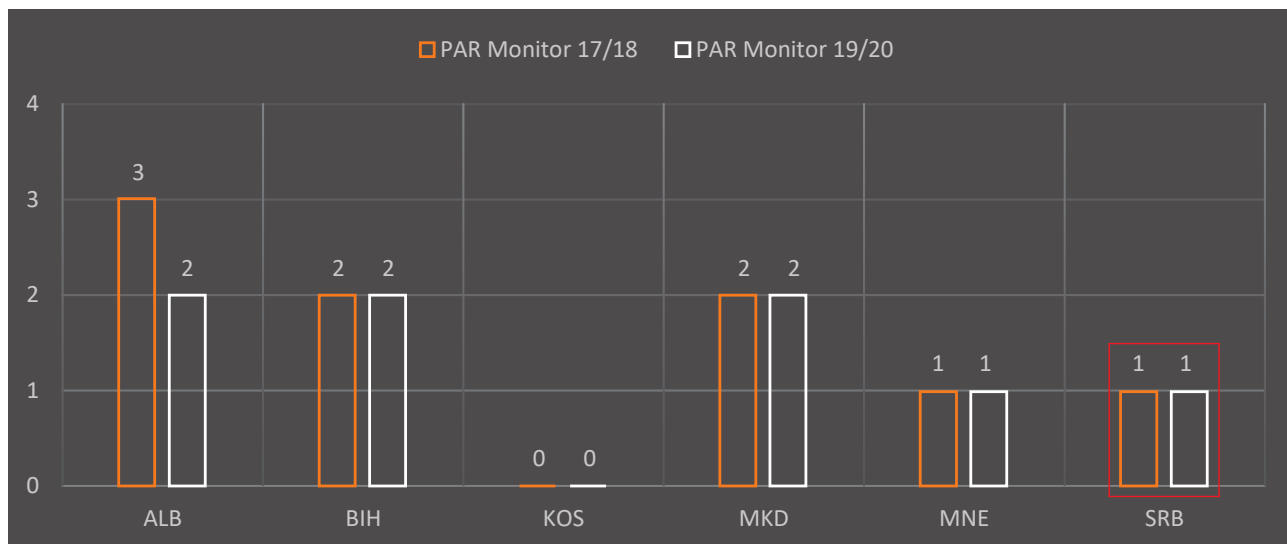
358 The PIFC portal was available at the following address, <http://ifkj.mfin.gov.rs/> (last accessed on 27 May 2021).

the crisis, it is possible that many regular activities of public administration bodies have been put aside. Still, PIFC remains largely unpromoted and absent from the public discourse outside of the expert circles. Finally, consolidated reports on PIFC do not get parliamentary attention. As in the PAR Monitor 2017/18, there is no evidence that either the National Assembly, or its committees, have discussed these reports in the last two years prior to the monitoring.

Altogether, the 2019/20 monitoring cycle paints almost identical picture as previously. Most of publicly available information on PIFC stems from the CHU's work and its consolidated reporting which has seen improvements over the years. Apart from that, and transparency of internal audit quality reviews, in all the other aspects observed by the PAR Monitor there is little to no public availability and outreach, resulting in the indicator value of 1 for the second time.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 22: Indicator PFM_P6&P8_I1: Public availability of information on public internal financial controls and the parliamentary scrutiny



Regional PAR Monitor reports with results for all WB administrations are 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

WeBER indicator PFM_P11&13_I1: Availability of public procurement related information to the public

Indicator element	Scores 2019/2020
E.1 Central procurement authority regularly reports to the public on the implementation of overall public procurement policy	4/4
E.2 Central review body regularly reports to the public on procedures for the protection of rights of bidders in public procurement	2/4
E.3 Reporting on public procurement by the central procurement is citizen-friendly and accessible	1/2
E.4 Public procurement portal is user-friendly	2/2
E.5 Central-level contracting authorities regularly publish annual procurement plans	0/4
E.6 Central-level contracting authorities regularly publish annual procurement reports	0/4
E.7 Central procurement authority publishes open procurement data	2/2
E.8 Open and competitive procedures are the main method of public procurement	2/4
Total score	13/26
Indicator value (scale 0 – 5)³⁵⁹	2

Public procurement indicator was measured for the first time, and it sets baseline value in this cycle. Monitoring findings show that central procurement bodies regularly report on the implementation of procurement policy and protection of rights in procurement procedures. Public Procurement Office of the Government (PPO) publicly releases annual reports since 2003, and from 2013, reports are published on a semi-annual and annual basis.³⁶⁰ Republic Commission for the Protection of Rights in Public Procurement Procedures (RCPRPP) is regular too in producing and publishing online its annual reports since 2012. In contrast to the PPO, the last available RCPRPP report at the time of measuring this indicator, in December 2020, was the one for 2018, and the 2019 annual report was published subsequently, resulting in the assessment of partial regularity in publishing report online in accordance with the element methodology.³⁶¹ Pursuant to the Public Procurement Law (PPL), RCPRPP is responsible to the National Assembly and submits annual work report by 31 March every year;³⁶² and whereas there is no defined schedule for online publication, reports should be desirably made public as soon as possible upon its submission to the parliament.

359 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.

360 Public Procurement Office, available at: <http://www.ujn.gov.rs/izvestaji/izvestaji-uprave-za-javne-nabavke/> (last accessed on 28 May 2021).

361 According to the indicator methodology, the reports covering the last three full calendar years are taken into consideration at the time of measurement. All the RCPRPP are available at: http://kjin.rs/o-nama/izvestaji-o-rad-u-republicke-komisije/?sr_pismo=lat (last accessed on 28 May 2021).

362 Art. 203, Public Procurement Law, Official Gazette No. 91/2019-3, available at: <https://bit.ly/3uuMLtI> (last accessed on 28 May 2021).

Looking at the citizen-friendliness of reporting on public procurement, PPO reporting practice is assessed as partially so. In other words, annual reports contain plentiful of graphically presented data, and most of the procurement outcomes are visually presented in a manner understandable for the broader audience. They are published at clearly designated online location of the PPO website, and available with less than three clicks from the homepage. However, reports for the last two reporting years do not contain reader-friendly summary that would help the viewers to get acquainted more easily and succinctly with the main outcomes within reporting period. Reports start off with an introductory part which mainly outlines the reporting obligations of the PPO and is followed by the section on general performance indicators. Example of reports in the WB region which include these summaries can be found in Montenegro, where the Directorate for Public Procurement Policy produces so-called public procurement ID cards, with a succinct summary of an annual performance.³⁶³

When it comes to the official public procurement portal run by the PPO, it satisfied majority criteria for user-friendliness (5 out of 6). First, one does not have to be registered user to be able to use its search functionalities and view documentation uploaded thereon; secondly, access to the portal is not conditioned with any subscription fees; third, it contains straightforward and user-friendly guide on how to use portal's interface, and video instructions; fourth, section on frequently asked question is available for both general inquires on registration or on specific questions on procurement procedures recorded on the portal; fifth, although there is no general search option, navigation through the public procurement procedures is allowed for all categories within each portal's section (such as procedures, plans, reports, registries), including search per contracting body, procedure type, procurement subject etc. However, no glossary on the key public procurement terms is offered at the portal but is only available from the homepage of the PPO.

It should be noted though that notwithstanding its relatively high user-friendliness, there are few drawbacks to the portal that can be looked into in the future. In other words, while visitors can download tender announcement without prior registration, documentation view is still limited, and registration is required for the entire tender documentation access. Also, there are two active public procurement portals - the older one containing documentation on procurement procedures initiated before 1 July 2020, and the new portal, analysed in this monitoring cycle, containing procedures initiated afterwards. Existence of different online portals at the same time undermines attempts to perform research or analysis and precludes interested public from having an easy insight into public procurement over the years, so possibilities of integration could be further explored.

Furthermore, vast majority of ministries, central level contracting authorities, regularly publish annual procurement plans and reports online (either through ministries' websites or through the public procurement portal).³⁶⁴ This means that, with few exceptions, they have made procurement plans publicly available for the current and last calendar year at the time of monitoring (for 2020 and 2019), and annual reports for the last two calendar years (for 2019 and 2018). Such exceptions though made a difference in the assessment of this indicator element since not all ministries have had at least one plan, and one report, published for at least single observed year for each document type. For this reason, it received score of zero according to the methodology despite the predominantly transparent plans and reports.³⁶⁵

For the annual procurement plans, three ministries have had one such document missing at the time of monitoring (Ministry of Health, MoF, and Ministry of Culture and Media), and one did not publish any of them for both years observed (cabinet of the minister without portfolio for regional development and the functioning of public enterprises).³⁶⁶ For procurement reports, the same cabinet of the minister without portfolio had no

363 See report for 2019 of the Directorate for Public Procurement Policy in Montenegro, available at: <http://www.ujn.gov.me/wp-content/uploads/2020/07/lzvjestaj-2019.-29.05.2020.-1.pdf> (last accessed on 28 May 2021).

364 For the total number of 20 ministries, including ministries without portfolio (2). Three new ministries formed after parliamentary elections in June 2020, and who did not exist in the period for which majority of documents were observed, were excluded at the time of monitoring in November 2020. These ministries are the Ministry for Human and Minority Rights and Social Dialogue, the Ministry for Family Care and Demography, and the Ministry for Village Care.

365 To be subject to point allocation in this element, all sample ministries need to have published procurement plans for at least the current calendar year, and procurement reports for at least one of the two calendar years observed at the time of monitoring.

366 Ministry of Finance published annual procurement plan for 2020 subsequently, available at: <https://mfin.gov.rs/o-ministarstvu/planovi> (last accessed on 31 May 2021).

procurement reports available on any online source.³⁶⁷ It should be noted that annual procurement documents are mostly easily accessible from ministries' websites, and the public procurement portal offers sections on contracting authorities' plans and reports, for 2020 onwards, right from its homepage.³⁶⁸ In addition, ministries often publicise procurement reports on a quarterly basis, and there are also instances of case-by-case reporting whereby ministries publish documents for each implemented procurement for a given year separately (such as tender announcements and documentation, questions and answers, notifications on changes, contract award notices etc.). Although exposing stock of implemented procurements annually, such fragmented approach to reporting makes review of public procurement information harder to navigate and it does not offer general overview of procurement activities. On the opposite, available reports downloadable from the public procurement portal only offer general overview of values of implemented public procurements that are exempted from the PPL, and of contracts awarded based on procedure method (open or negotiated), and procurement subject (goods or services) without further details.

When it comes to online availability procurement data in open format, it is available from the public procurement portal. Portal allows users to export open data in different file extensions for each section of the portal (procurement plans, procedures, decisions, protection of rights - decisions by the RCPRPP, procurement reports, lists of contracting authorities, bidders who have been contracted etc.). As explained earlier, documentation view is limited, and non-registered users are unable to download the entire tender documentation. Nevertheless, the PPO publishes portal's annual data on public procurement announcements through the national open data portal as well, broken down by year and with daily updates for the ongoing year and month.

Finally, in the last calendar year at the time of monitoring (2019), 7% of public procurement procedures were implemented using other methods than open ones (competitive). The PPO publicly discloses information on methods used in its annual reports, but it is expressed only as share of the total contract value for the year in question. For the sake of public scrutiny, it would be desirable that this figure is also expressed as number of all awarded contracts.

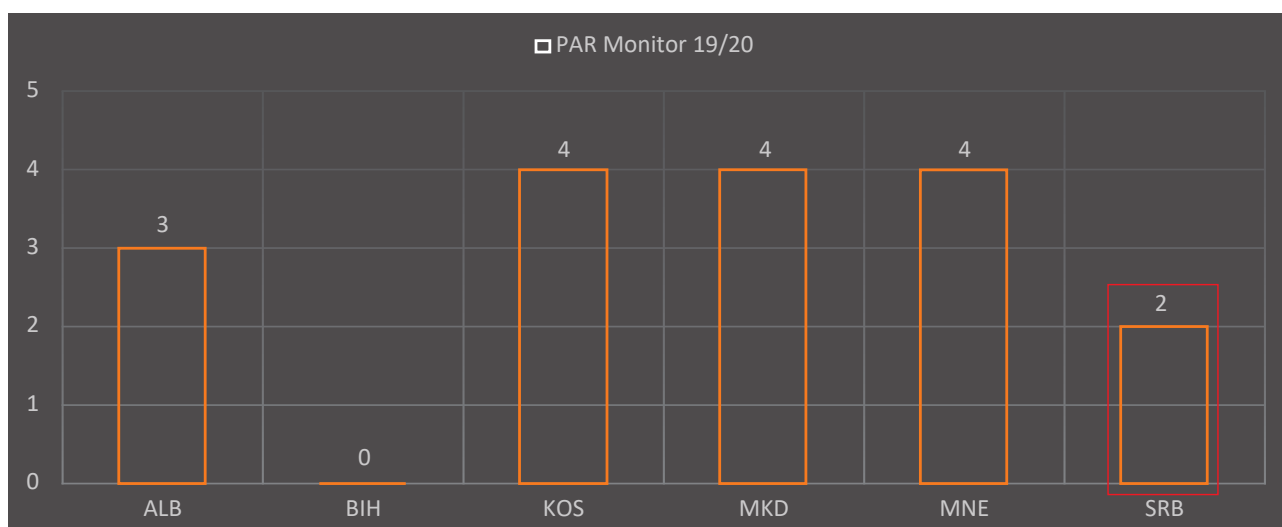
Due to shortcomings mostly in relation to the ministries' publication of annual procurement plans and reports, baseline value for the availability of public procurement information to the public is 2. Remaining monitored aspects are relatively highly scored – there is almost full regularity of annual reporting to the public by central bodies, public procurement portal is user-friendly, and procurement data is available in open formats. There is, though, a room for additional improvements in making information from annual reports citizen friendly.

³⁶⁷ There are examples of technical discrepancies when ministries switch from an old to a new website that affect documentation availability. For example, the website of the Ministry of Health offers no traceable information on annual procurement plans. The archived, old website provides a link to a location where this information is supposed to be stored, however it leads to a non-existing page, see at: <http://arhiva.zdravlje.gov.rs/showpage.php?id=310> (last accessed on 30 May 2021). Procurement plan for 2020 of the same Ministry is available at the public procurement portal at: <https://jnportal.ujn.gov.rs/plan-eo/845> (last accessed on 30 May 2021). In another example, the Ministry of Mining and Energy kept procurement reports for the previous years in the archive of the old website version at the time when monitoring was done, but these are unavailable at the moment of writing this report.

³⁶⁸ Available at: <https://jnportal.ujn.gov.rs/planovi-nabavki-svi>, and at: <https://jnportal.ujn.gov.rs/annual-reports> (last accessed on 30 May 2021).

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 23: Indicator PFM_P11&P13_I1: Availability of public procurement related information to the public



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

PRINCIPLE 16: THE SUPREME AUDIT INSTITUTION APPLIES STANDARDS IN A NEUTRAL AND OBJECTIVE MANNER TO ENSURE HIGH-QUALITY AUDITS, WHICH POSITIVELY IMPACT ON THE FUNCTIONING OF THE PUBLIC SECTOR

WeBER indicator PFM_P16_I1: Supreme Audit Institution's communication and cooperation with the public pertaining to its work

Indicator element	Scores 2019/2020	Scores 2017/2018
E.1 SAI develops a communication strategy for reaching out to the public	2/4	2/4
E.2 SAI has dedicated at least one job position for proactive communication and provision of feedback to the public	4/4	4/4
E.3 SAI utilises various means of communication with the public	2/2	1/2
E.4 SAI produces citizen-friendly summaries of audit reports	4/4	0/4
E.5 Official channels for submitting complaints or initiatives to SAI by external stakeholders are developed (wider public, CSOs)	0/2	0/2
E.6 SAI consults CSOs and their work for the purpose of identifying risks in the public sector	0/2	0/2
Total score	12/18	7/18
Indicator value (scale 0 – 5)³⁶⁹	4	2

The SAI of Serbia did not adopt communication strategy in the period between two monitoring cycles, however, as before, communication goals towards external stakeholders are clear from its strategic perspective. Namely, SAI has developed and is currently implementing the Strategic Plan for 2019-2023, with one of the specific objectives to preserve reputation and strengthen the impact of the SAI through partnering with key

369 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.

stakeholders (specific objective 3.4).³⁷⁰ Like in the previous strategic plan analysed in the baseline PAR Monitor, SAI seeks to achieve this by continuously presenting the values and benefits of the external audit to the most important stakeholders – the National Assembly, the public, professional and civil society organisations, and by increasing visibility of its products and communicating “objective information in a simple and clear way, using language all stakeholders comprehend.”³⁷¹ The same Strategic Plan also announces that a stand-alone communication strategy, i.e. stakeholders engagement strategy, will be developed for the forthcoming strategic period which speaks of the SAI intention to further enhance practices of reaching out to interested public. However, no such communication strategy or further information is publicly available at the time of writing this report.³⁷²

Furthermore, SAI has maintained a job position for proactive communication and provision of feedback towards the public. The difference since the baseline PAR Monitor is that such job position is organised within the Service for international cooperation and public relations according to general organisational changes the institution has undergone in the meantime (previously within the Office of the SAI President). The Service is tasked *inter alia* with public relations, collection and processing of citizens’ complaints, communication with civil society organisation and other independent bodies, with one out of two vacancies being filled at the time of monitoring.³⁷³ Keeping at least a single position tasked with external communication confirms SAI overall strategic commitment to enhance its publicity and stakeholder engagement.

The first positive development in this monitoring cycle in this area is that the SAI has used somewhat more communication means than in 2017/18, to increase its work visibility and public engagement. Beside usual press conferences and press releases a dedicated public event has taken place in December 2019 to mark 175 years of the predecessor external control institution organised by the SAI.³⁷⁴ On this occasion, the SAI has invited broad group of stakeholders with the aim to promote its own work to external stakeholders and the government accountability culture.³⁷⁵ Although out of the monitoring timeframe, it is noteworthy that the SAI participated in public campaigns for greater citizen participation in transparent management of local finances.³⁷⁶ Regular exchange through events with academic institutions, civil society and media has taken place in recent years as well. Moreover, although SAI did not engage yet in data visualisation, it regularly publishes press presentations on conducted audits with plenty of visualised and simplified data.³⁷⁷ That said, SAI still does not take advantage of social media, or publicise promotional materials other than audit reports (such as information brochures, leaflets, videos, or multimedia presentations). Nevertheless, it has explored more external communication practices in recent years, and it remains to be seen whether this trend will continue especially in the light of expected adoption of external communication strategy of the SAI.

The significant leap compared to the baseline monitoring cycle lies in the production of summaries of audit reports. Unlike previously when only performance audits were assessed as citizen-friendly, SAI has produced such summaries for all audit reports observed in this cycle. Published mostly as one-pagers, they are standardised, available from a single online location and are considered as citizen friendly.³⁷⁸ The structure or length of summaries can display slight variations depending on the types of audits. For instance, summaries of compliance audit reports have more text on average than those of financial ones, on key findings and conclusions, but otherwise they share the same structure giving overview of audit, conclusions, and

370 Strategic Plan of the State Audit Institution for period 2019 - 2023, p.43, available at: <https://bit.ly/3z1lIPx> (last accessed on 1 June 2021).

371 Ibid. p. 44. The Action Plan of the Strategic Plan lists activities with implementation milestones, and performance indicators, The Action Plan is not publicly available but is confirmed during the interview with SAI representative, held on 16 December 2020.

372 Ibid. Interview with the SAI representative confirmed that a proposal for a stand-alone communication strategy was being developed with plans for adoption by the end of 2020.

373 According to the methodology, the job position for proactive information and provision of feedback refers to a position specifically designed for these matters, or to a more general position, such as public relations or affairs, provided that this position includes one or more of the following tasks: 1) preparation of information, documents and other materials designed for proactive communication towards the public; 2) answering citizens’ questions and queries related to the SAI scope of work; 3) handling and forwarding citizens’ complaints, tips and inputs regarding the utilisation of public funds

374 Supreme Audit Institution of Serbia, available at: <https://bit.ly/3i80EcW> (last accessed on 1 June 2021).

375 Representatives of all the branches of the government, independent institutions, supreme audit institutions in the region, mayors, international organizations, media, and civil society.

376 Available at: <https://bit.ly/2SPV7Pm> (last accessed on 1 June 2021). Monitoring timeframe for this element is the period of twelve months preceding the start of measurement (i.e., November 2019 – November 2020).

377 Available at: <https://www.dri.rs/mediji/press-materijal.515.html> (last accessed on 1 June 2021).

378 Summaries of audit reports are available at: <http://dri.rs/revizije/rezime-izvestaja-o-reviziji.406.html> (last accessed on 1 June 2021). All audit reports published in the period of twelve months preceding the measurement are analysed and only finalised audits are considered – 28 November 2019 to 27 November 2020.

recommended points for action. At the same time, performance audits are even more approachable language-wise, presenting the audit results in the form of storytelling, with basic statistics and summarising what the problem is and what can be done.³⁷⁹ Overall, approach to audit reporting is more citizen-oriented compared to the baseline monitoring, and more closely connected with the international standards on transparency and simplicity in reporting to the public.³⁸⁰

There is still no introduced channel or information for submitting a complaint or tip through the SAI webpage. As noted in the PAR Monitor 2017/18, SAI continues to receive citizens reports warning about the way in which budget beneficiaries spend taxpayers' money, however this part of SAI activities still lacks visibility. In practice, citizens approach SAI using general email or landline in case of which they are directed towards e-mail communication.³⁸¹ Annual Activity Reports of SAI remain the only written evidence that inform a bit more on the process of receiving and acting upon information received in such a way – inputs of citizens are forwarded to responsible supreme state auditors depending on the budget beneficiary in question and can be of use in planning of annual audit programmes.³⁸² Hence, findings from both monitoring cycles, the 2017/2018 and the 2019/2020, inform that SAI regularly engages in direct communication with the public, and as mentioned earlier there is also job position tasked with handling of citizen complaints and tips, but from the outside point of view this possibility is insufficiently visible and advertised on the SAI portal.

Finally, as in previous cycle, one can conclude from the available data sources that the SAI did not consult CSOs for identifying risks in public funds' usage or in audit planning, during two calendar years that preceded monitoring (2019 and 2020). Though, general responsiveness and openness of SAI towards civil society is well evidenced. As mentioned before, there is a commitment within the Strategic Plan to continuously report on its work to CSOs, among other stakeholders, and the Service for International Cooperation and Public Relations is tasked with communication and coordination with CSOs. At the same time, annual activity reports and news on website inform on SAI's involvement in projects and events together CSOs.³⁸³ However, there is no systematic or institutionalised involvement of civil society as such, specifically for audit consultation purposes and such opportunities remain to be explored.

Overall, SAI of Serbia has made a notable advancement since the baseline PAR Monitor due to being increasingly proactive in external communication to the public. It has also tried different options to engage stakeholders such as tailored press presentations and digests, or dedicated events for external audit promotion. Moreover, SAI has standardised the way in which it produces and publishes summaries of audit reports and has started publicising one-pagers for each audit report published that are simply structured with clear main messages. As the result, the indicator value in this cycle is 4.

379 It is also of note that for performance audits summaries are also contained within the audit report documents, whereas for others, summaries are only laid out under the designated website subsection

380 INTOSAI-P 12, Principle 4 - Reporting on audit results and thereby enabling the public to hold government and public sector entities accountable, enlist that 1) SAIs should report objective information in a simple and clear manner, using language that is understood by all their stakeholders, 2) SAIs should make their reports publicly available in a timely manner, but 3) SAIs should facilitate access to their reports by all their stakeholders using appropriate communication tools, available at: <https://bit.ly/2RhW6ay> (last accessed on 2 June 2021). See also INTOSAI-P 20, Principles of Transparency and Accountability, Principle 8 - SAI reports are available and understandable to the wide public through various means (e.g., summaries, graphics, video presentations, press releases), available at: <https://bit.ly/2RU2lw9> (last accessed on 2 June 2021).

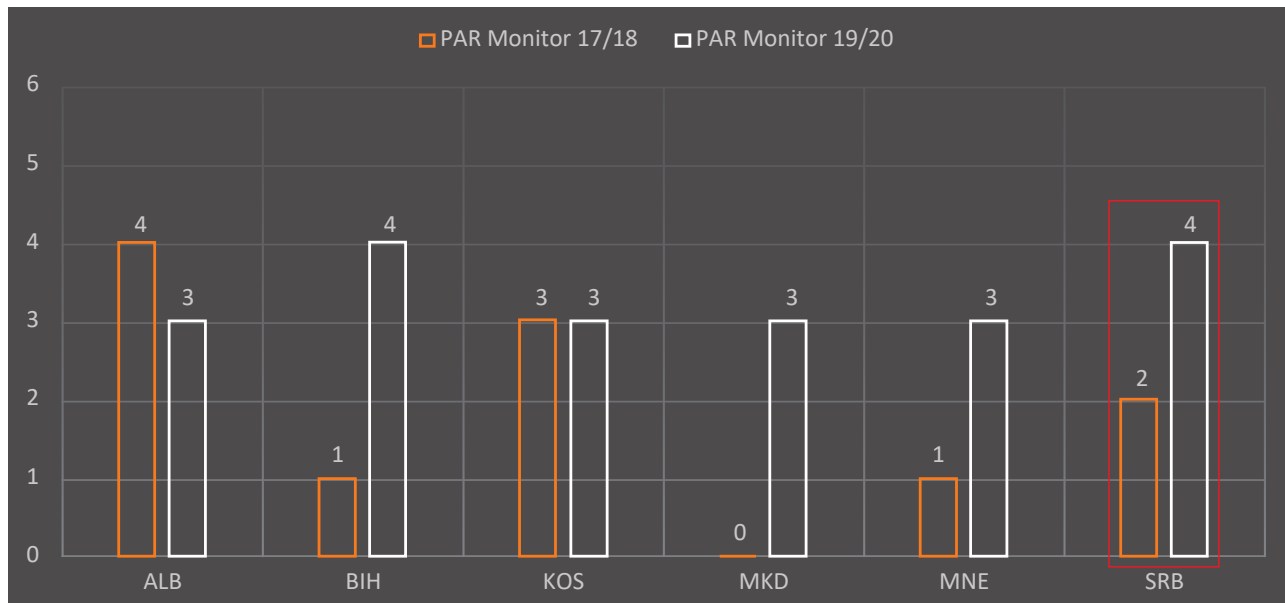
381 Interview with SAI representative, held on 16 December 2020.

382 SAI Annual Activity Reports for 2019, p. 105, and for 2020 p. 103, available at: <http://dri.rs/dokumenti/godisnji-izvestaji-o-radu.93.html> (last accessed on 2 June 2021).

383 SAI Annual Activity Reports for 2019, p. 108, and for 2020, p. 123.

HOW DOES SERBIA DO IN REGIONAL TERMS?

Graph 24: Indicator PFM_P16_I1: Supreme Audit Institution's communication and cooperation with the public pertaining to its work



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

VII.5 SUMMARY OF RESULTS IN THE PUBLIC FINANCIAL MANAGEMENT AREA

In the budget transparency domain, monitoring outcome is the same as in the baseline PAR Monitor. Enacted annual budgets are publicly released and easily accessible from the webpage of the MoF, but the publication of budget execution reports is either irregular or unavailable. Monthly public finance bulletins allow public review of in-year budget execution, but these do not get published predictably following each month, and mid-year budget execution reports do not get published at all. In addition, in-year monthly reports display economic expenditures only without detailing them by organisations or government functions. Year-end reports, on the other hand, have become publicly available since the baseline monitoring cycle, as the National Assembly has passed overdue laws on final accounts of the budget. Nevertheless, year-end reports still do not inform on the Government's policy performance in different sectors. Citizen budgets are available from the homepage of Ministry's website, but previous editions are unpredictably stored online. Finally, open data policy is not strictly followed but the MoF kept publishing macroeconomic and fiscal data in one of the machine-readable data formats.

Monitoring results for PIFC also mirror those from PAR Monitor 2017/18. The CHU produces and publishes consolidated reports on PIFC online, but their public release is often schedule late during the year (e.g., the 2019 report still undisclosed in November 2020). CHU has continued to publish quality review reports on internal audit too but this time not for two consecutive years. There was no major change when it comes to practices of ministries in publishing FMC information online – roughly a third of them publish at least single out of three information observed. In addition, CHU is assessed as even less proactive in communication towards the public than in the baseline monitoring. Finally, the National Assembly does not discuss consolidated reports on PIFC in plenary or in committees.

PPO and RCPRPP report on public procurement policy implementation and these are available on their webpages since 2013, and 2012, respectively, but not regularly in each case (a RCPRPP annual report missing at the time of monitoring) Reporting by the PPO, although easily accessible online, is assessed as partially citizen friendly as there are no summaries on the main procurement outcomes. The new public procurement portal is assessed as user-friendly but access to all documents is subject to registration. The majority of ministries regularly publish annual procurement plans and reports, but there are exceptions. Procurement data in open format is available from the public procurement portal which allows open data export for each section of the portal. Finally, in 2019, 7% of public procurement procedures were implemented using other than open methods.

The SAI of Serbia has enhanced its communication with stakeholders, resulting in the higher assessment vis a vis the baseline PAR Monitor. While communication strategy is still expected, visibility of SAI and its work is commitment under the Strategic Plan. Also, SAI keeps a job position for processing of citizens' tips and preparation of the content for external communication, among other tasks. Since the 2017/18 cycle, the SAI has used additional means of proactive engagement including tailored press publications, and awareness raising events, but major improvement has been noted in production of citizen-friendly summaries of audit reports, i.e., SAI has started producing one-page summaries for all audits reports. On the other hand, although anyone can still submit a question, a complaint, or any other input to SAI, no official channel, visible from its homepage has been introduced since the baseline monitoring. Finally, available data sources again did not return evidence that CSOS are consulted when for identifying risks in public sector or in audit planning.

VII.6 RECOMMENDATIONS FOR PUBLIC FINANCIAL MANAGEMENT

TRACKING RECOMMENDATIONS FROM PAR MONITOR 2017/2108

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. 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. Preferably in the form of being website banner accessible right on the homepage, and similarly to publishing the Citizen budget or PFM reform documents. This can be done by either rearranging sections that are regularly updated with current data (e.g., Macroeconomic and Fiscal Data) or by making a new section. Special attention should be given to the year-end budget reporting, which the public does not have access to in a clear and easily accessible way.	No action taken	There is no one single location on the MoF website with all budget-related documents. 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 (laws on final accounts of budget) are available at the National Assembly website. Macroeconomic and fiscal data overview is available from Documents section. In sum, finding all budget-related information still requires significant effort.
2. Publishing of budget execution data should be as comprehensive as possible, for better understanding of external stakeholders and greater transparency. This means that besides the "business as usual" publishing of information by economic categories, each report should allow for accessing execution data by functions of the Government and individual budget users' execution for the whole public sector (state budget, local self-governments, social security organisations, state-owned enterprises).	Partially implemented	Available budget execution reports do not reveal data on all budget classifications. Recently adopted laws on the final accounts of the budget for 2002-2019 present expenditures based on basic economic, organisational, programme and functional classifications, however mid-year reports are unavailable and monthly reports contain economic data only. ³⁸⁴
3. In addition, the year-end budget report should provide performance information of the Government. Firstly, this information should be disclosed in a concise and citizen-friendly way explaining achievements by the Government in terms of budget execution, and secondly, more detailed information can be provided by disclosing information on programme-budget indicators at the level of the programmes of all budget users.	No action taken	As pointed out in this PAR Monitor, year-end reports of the final accounts of budget do not present non-financial performance information of the Government (in various policy fields). ³⁸⁵
4. Expired editions of the Citizen budget should be stored at a single location, together with the current one. This will ensure the ability to easily compare between years and track progress in producing Citizen budgets. To that end, MoF should consider increasing the quality of its contents and making data more telling, by e.g. highlighting the functions/purpose of budget spending, on key budget projects and measures planned for the year, on the possibilities for citizen participation in budget formulation at different levels, but also on advanced data visualisation - to keep data simple and understandable while still increasing their visual appeal.	No action taken	Expired and current citizen budget are not stored at a single location. The Citizen budget for 2019 is stored in the archive section, while the current one can be accessed from the homepage or through the documents section. At the moment of production of this PAR Monitor, website visitors can only access Citizen budgets for 2019 and 2021. ³⁸⁶

384 Sources: MoF, Monthly Public Finance Bulletins, available at: <https://www.mfin.gov.rs/aktivnosti/bilten-javnih-finansija>; National Assembly, Law on the Final Account of the 2019 Budget, available at: <https://bit.ly/3dANoxA> (last accessed on 1 June 2021).

385 National Assembly, laws on the Final Account of the Budget 2002-2019, available at: <https://bit.ly/3x6pQqq> (last accessed on 1 June 2021).

386 Ministry of Finance, available at: <https://bit.ly/3dybveA>, and <https://bit.ly/3639OBM> (last accessed on 1 June 2021).

<p>5. 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>No action taken</p>	<p>The macroeconomic and fiscal data, in one of open formats, is available on the MoF website under the section Documents. Although assessed as open data, with the MoF not yet on the list of organisations at the national open data portal, and without clear open data section at the Ministry's website, situation remains unchanged since the baseline PAR Monitor.³⁸⁷</p>
<p>6. Ministries in Serbia, but also other direct budget beneficiaries, should dedicate an easily accessible, single website section for updates on PIFC within the organisation. Without the need to explain in minute detail all aspects on FMC and the internal audit, it should at least include: mission and goals of the organisation, responsible persons for implementing the PIFC, business procedures, information on risk management and reported irregularities. Beyond descriptions and static information, this section should be regularly updated with results of PIFC implementation in the daily functioning of the organisation.</p>	<p>No action taken</p>	<p>The conclusion of this PAR Monitor is that information on PIFC policies, remain greatly absent from websites of ministries, even in its basic form.</p>
<p>7. CHU should improve external communication by publishing dynamic materials for explaining PIFC and highlighting important developments in the public sector to the citizens, using simple language and examples from practice. This can be done through various means such as infographics, videos or brochures, but also separate readers' digests or summaries of reports that CHU already produces. Existing social media channels (e.g., MoF Facebook) or new ones can serve as an additional platform beside the CHU website.</p>	<p>No action taken</p>	<p>There is no evidence that the CHU has adopted a citizen-friendly approach - it has not published any reader-friendly material since the baseline PAR Monitor. Additionally, the promotion of CHU through events and social media remains limited. CHU's website was not used for additional promotion and is currently out of function. In sum, the visibility and usefulness of CHU publications to broader, non-expert interested public has not improved.³⁸⁸</p>
<p>8. SAI should aim to produce a citizen-friendly summary for each audit report published, regardless of the audit type. As a good starting point, short and concise summaries produced for performance audit reports can be replicated.</p>	<p>Fully implemented</p>	<p>SAI produces concise summaries for audit reports, regardless of their type. Summaries in English are still published exclusively for performance audit reports.³⁸⁹</p>
<p>9. On a specifically dedicated website location, SAI should clearly promote information and its procedure on receiving and handling citizens' inputs, tips, and complaints. Since SAI has already established an internal system for receiving and handling these, increased visibility and promotion of this practice can positively affect citizens' engagement in reporting irregularities as well as government accountability.</p>	<p>No action taken</p>	<p>The procedure on receiving and handling citizens' inputs, tips, and complaints is not promoted on the website. Same as in the baseline PAR Monitor, Annual Activity Reports elaborate on the process behind receiving and processing input from the citizens.³⁹⁰</p>
<p>10. For the next cycle of strategic development planning, SAI should consider adopting a stand-alone communication plan, as one of the pillars of the strategic development document. By adopting such a plan and making it public, SAI's approach to external communication and the planned involvement of civil society in its work becomes more transparent and predictable and SAI credibility strengthened.</p>	<p>Initiated</p>	<p>In the opening message of the Strategic Plan for 2019-2023, SAI states that in the following period a communications strategy, i.e., stakeholders Engagement Strategy to accompany this Strategic Plan (p. 5). At the time of production of the PAR Monitor 2019/2020, communication strategy has not been published on the website. External communication goals are included in and can be discerned from the broader strategy.³⁹¹</p>
<p>11. Finally, SAI should consider using as many citizen-friendly tools as possible for the communication of its work. Possible options include but are not limited to infographics, videos, brochures and social media, but also data visualisation which can be very suitable for SAI as it is in possession of a large amount of data on the utilisation of public funds in Serbia. Such tasks can be attached to the existing job positions within the Office of SAI President in charge of external communication and processing of citizens' inputs.</p>	<p>Partially implemented</p>	<p>The usage of citizen-friendly tools has increased, and the SAI does make use of simple and visualised data in press presentations on past audits which are regularly published, organises public events or participates in public campaigns. However, it does not make use of proper data visualisation, and is not present on mainstream social media.³⁹²</p>

387 Macroeconomic and Fiscal data, available at: <https://bit.ly/3qE3ryg>, Open Data Portal at: <https://data.gov.rs/sr/organizations/?page=1> (last accessed on 1 June 2021).

388 MoF - CHU, available at: <https://mfin.gov.rs/o-ministarstvu/centralna-jedinica-za-harmonizaciju>, CHU portal (inactive), at: <http://ifkj.mfin.gov.rs/> (last accessed on 1 June 2021).

389 SAI - audit summaries for 2019, available at: <https://bit.ly/3dvsM8s>, and audit summaries for 2020 at: <https://bit.ly/2UOcalA> (last accessed on 1 June 2021).

390 SAI Annual Activity reports, available at: <https://www.dri.rs/documents/annual-activity-reports.181.html> (last accessed on 1 June 2021).

391 SAI Strategic Plan 2019-2023, available at: <https://www.dri.rs/documents/strategic-plan.180.html> (last accessed on 1 June 2021).

392 SAI press materials, available at: <https://www.dri.rs/mediji/press-materijal.515.html>; interview and press clipping (last accessed on 1 June 2021).

PAR MONITOR 2019/2020 RECOMMENDATIONS

Majority of the recommendations from the 2017/2018 PAR Monitor, still relevant in this monitoring cycle, is 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 2017/2018

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 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. 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).
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.
5. MoF should store expired editions of the Citizen budget at a single location, together with the current one.
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.
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: mission and goals of the organisation, responsible persons for implementing the PIFC, business procedures, information on risk management and reported irregularities.
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).
9. SAI should clearly promote information and its procedure on receiving and handling citizens' inputs, tips, and complaints on a specifically dedicated website location.
10. Finally, 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.

New recommendations 2019/2020

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.
12. PPO should consider registration-free access to the public procurement portal for all interested users, to allow monitoring of contract realisation.
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).

METHODOLOGY

APPENDIX

PAR Monitor Methodology was developed by the research and expert team of WeBER and widely consulted among all relevant WeBER associates. Overall, for the second, 2019/2020 monitoring cycle, the methodology is based on the selection of 22 SIGMA Principles within six key areas of PAR, and selected Principles are monitored through 23 compound indicators that focus on different aspects of PAR.

PAR Monitor methodology (master) document provides details on the overall approach of WeBER PAR monitoring, the process of developing the methodology, the selection of the Principles which the WeBER project monitors and the formulations of indicators with the basic methodological approaches. Detailed information needed for the measurement of each indicator is provided in separate detailed indicator tables. Each detailed indicator table contains the formulation and focus of a specific indicator, as well as the following information for each of the indicator elements: formulation, weight, data sources, detailed methodology, and point allocation rules.

PAR Monitor methodology, and detailed indicator tables are available at the following link: <http://www.par-monitor.org/pages/par-monitor-methodology>

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.

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 concepts, 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. The General Secretariat of the Government - <http://www.gs.gov.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. Public Policy Secretariat - <https://rsjp.gov.rs/>
5. Ministry of Culture and Media - <https://www.kultura.gov.rs/>
6. Ministry of Construction, Transport, and Infrastructure - <https://www.mgsi.gov.rs/>
7. Ministry of Labour, Employment, Veteran and Social Affairs - <https://www.minrzs.gov.rs/>
8. Office for the Coordination of Affairs in the Process of Negotiation with the Provisional Institutions of Self-Government in Pristina - <http://www.kord-kim.gov.rs/>
9. National Employment Agency - <http://www.nsz.gov.rs/>
10. eGovernment Portal - <https://www.euprava.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 Labour, Employment, Veteran and Social Affairs - <https://www.minrzs.gov.rs/>
2. Ministry of Public Administration and Local Self-Government - <http://mduls.gov.rs/>
3. Ministry of Culture and Media - <https://www.kultura.gov.rs/>
4. Ministry for European Integration - <https://www.mei.gov.rs/>
5. The General Secretariat of the Government - <http://www.gs.gov.rs/>
6. Environmental Protection Agency - <http://sepa.gov.rs/>
7. Tax Administration - <http://www.poreskauprava.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. 1. Republic Geodetic Authority - <http://www.rgz.gov.rs/>
2. 2. Serbian Business Registers Agency - <http://apr.gov.rs/>
3. 3. Ministry of Interior - <http://mup.gov.rs/>
4. 4. Tax Administration - <http://www.poreskauprava.gov.rs/>
5. 5. eGovernment Portal - <https://www.euprava.gov.rs/>.

In the Public Finance 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_I1), and Supreme Audit Institution's communication and cooperation with the public (PFM_P16_I1), the following websites of centrally responsible authorities were analysed:

1. Ministry of Finance - <http://www.mfin.gov.rs/>
2. State Audit Institution of Serbia - <http://www.dri.rs/>
3. 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 35 FOI requests were sent in the monitoring period from February to December 2020.

Table 7. FOI requests sent for the 2019/2020 monitoring cycle in Serbia

Institution	Date of request	Date of reply/information receipt*
Administrative Court	24 September 2020	6 October 2020
Administration for Joint Services of Republic Bodies	25 June 2020	29 June 2020
Administration for Cooperation with Churches and Religious Communities	21 May 2020	No reply, no information received
Environmental Protection Agency	24 February 2020	28 February 2020
General Secretariat of the Government	24 February 2020	No reply, no information received
Ministry of Agriculture, Forestry and Water Management	10 April 2020	22 May 2020
Ministry of Construction, Transport, and Infrastructure	25 June 2020	10 July 2020
Ministry of Culture and Information	25 June 2020 24 February 2020 10 April 2020	8 July 2020 25 February 2020 27 April 2020
Ministry of Defence	10 April 2020	No reply (only after a call)
Ministry of Education, Science and Technological Development	25 June 2020 10 April 2020	30 June 2020 13 April / 4 May 2020
Ministry of European Integration	24 February 2020	25 February 2020
Ministry of Environmental Protection	10 April 2020 21 May 2020	12 April / 2 June 2020
Ministry of Economy	25 June 2020	7 July 2020
Ministry of Finance	25 June 2020	2 July 2020
Ministry of Health	10 April 2020	23 April 2020
Ministry of Justice	10 April 2020	12 April / 14 May 2020
Ministry of Labour, Veteran and Social Affairs	25 June 2020 24 February 2020 10 April 2020	15 July 2020 26 February 2020 13 April 2020
Ministry of Mining and Energy	10 April 2020	18 May 2020
Ministry of Public Administration and Local Self-Government	24 February 2020 10 April 2020	6 March 2020 13 April / 29 May 2020
Ministry of Trade, Tourism and Telecommunications	10 April 2020	15 April / 3 June 2020
Ministry of Youth and Sport	10 April 2020	8 May 2020
National Assembly of the Republic of Serbia	10 April 2020	16 April 2020
National Academy of Public Administration	23 June 2020	30 June 2020
Office for the Coordination of Affairs in the Process of Negotiation with the Provisional Institutions of Self-Government in Pristina	25 June 2020	6 July 2020
Public Policy Secretariat	25 June 2020	9 July 2020
Public Procurement Office	25 June 2020	14 July 2020
Tax Administration	24 February 2020	10 March 2020
Treasury Administration	24 September 2020	7 October 2020

*Dates indicated do not mean in all cases provision of requested information. In certain cases, public authorities informed they will act upon request when the COVID-19 related state of emergency is lifted, or that 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 (covering PDC_P5_I2, PDC_P6_I1, PDC_P10_I1, PDC_P11_I1, PDC_P12_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), and
- Service Delivery, with civil society organisations specifically dealing with accessibility issues, vulnerable groups, and persons with disabilities (for indicator SD_P4_I1).

For selection of participants, purposive non-probability sampling was used, targeting CSOs with expert knowledge in the topics concerned. In Serbia, 3 focus groups with CSOs were conducted. As in the baseline PAR Monitor 2017/18, instead of a focus group with candidates who previously applied for job positions in central state administration, stakeholder interviews were organised as an alternative, due to the low response rate of focus group invitees. In addition, focus groups for the Strategic Framework for PAR covered only topics related to the indicator SFPAR_P2&4_I1 in this monitoring cycle, whereas for other indicator in this area, interviews were organised for data collection. Finally, two focus groups were organised online, as the consequence of the COVID-19 pandemic and preventive measures, and one in Belgrade.

Table 8. Focus groups conducted in Serbia

Date	Group	#	PAR Area
15 October 2020	Civil society	4 participants	Service Delivery
15 October 2020	Civil society	6 participants	Policy Development and Coordination, Accountability
28 December 2020	Civil society	5 participants	Strategic Framework of PAR

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 11 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. As in the case of focus groups, certain number of interlocutors were interviewed using online platforms, due to COVID-19 pandemic.

Table 9. Interviews conducted in Serbia

Date	Interviewees	PAR Area
9 October 2020	Senior civil servant	PSHRM
12 October 2020	Senior civil servant	PSHRM
12 October 2020	Senior civil servant	PSHRM
22 October 2020	Senior civil servant	PSHRM
3 November 2020	CSO representative	SFPAR
3 November 2020	Executorial level civil servant	SFPAR
5 November 2020	Former candidate for job position in central administration	PSHRM
6 November 2020	Former candidate for job position in central administration	PSHRM
13 November 2020	Expert in civil service area	PSHRM
8 December 2020	Former senior civil servant	PSHRM
26 December 2020	Executorial level civil servant in an independent body	PFM

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 three-stage, random, representative stratified sampling (primary sampling unit: polling station territories, secondary sampling unit: households, tertiary sampling unit: household member). It was implemented as part of the regional omnibus surveys in the Western Balkans during 5 May - 30 May 2020. For Serbia, the margin of error for the total sample of 1005 citizens is $\pm 3.15\%$, at the 95% confidence level.

Table 10. Survey sample breakdown

	Frequency	% (cases)
TOTAL	1005	100%
Key groups		
Gender		
Male	480	47.8
Female	525	52.2
Age		
18-29	183	18.3
30-44	265	26.4
45-59	258	25.7
60+	298	29.7
Educational attainment		
Primary school	287	27.3
High school	528	58.1
University degree or higher	189	13.3
Employment status		
In paid work	418	41.5
Unemployed	206	20.5
Other	381	38
Employment sector		
Public	104	24.9
Private	314	75.1
Area		
Rural	585	58.3
Urban	420	41.7

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 1513 civil servants participated in the survey from 16 June to 17 July 2020. 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 11. Breakdown of the sample for survey of civil servants

	Frequency	% (of cases)
TOTAL	1513	100
Key groups*		
Civil service position		
Senior civil service manager – head of authority	24	2.02
Senior civil service manager – not a head of authority	42	3.54
Non-senior civil service manager (executorial)	214	18.03
Civil servant in non-managerial expert position	650	54.76
Administrative support civil servant position	25	2.11
Civil servant on fixed-term contract or otherwise temporarily engaged	126	10.61
Political appointment (minister’s cabinet or otherwise)	7	0.59
Other	99	8.34
State administration institution		
Ministry	644	54.25
Subordinate agency	188	15.84
Centre-of-government institution (PM office, government office, government service)	84	7.08
Autonomous agency within the central state administration	190	16.01
Other	81	6.82
Gender		
Male	354	29.82
Female	696	58.64
Other	4	0.34
Don't wish to answer	133	11.20
Years working in the administration		
Mean= 13.28 years; Range=0-40 years		
Sector worked before joining the administration		
Local or regional administration	84	7.08
Other branch of power	69	5.81
Public services	179	15.08
International organisation	15	1.26
Non-governmental organisation	33	2.78
Media	11	0.93
Private sector	483	40.69
This was my first job	160	13.48
Other	153	12.89

**Due to instances of drop out from the survey by respondents, calculating frequency totals may not add up to the sample size (1513).*

Table 12. 95% confidence interval (CI) around the mean (per question of the survey of civil servants)

Question	95% CI	Question	95% CI	Question	95% CI
Q1_1	3.16-3.28	Q4_1	2.87-3.03	Q7	2.73-2.93
Q1_2	3.07-3.20	Q4_2	2.57-2.75	Q8_1	3.36-3.51
Q1_3	3.61-3.74	Q4_3	3.02-3.17	Q8_2	3.35-3.51
Q2	2.59-2.73	Q4_4	3.35-3.50	Q8_3	2.22-2.37
Q3_1	3.22-3.38	Q5_1	3.51-3.67	Q9	2.66-2.82
Q3_2	3.59-3.75	Q5_2	2.41-2.63	Q10	1.37-1.46
Q3_3	3.38-3.54	Q5_3	2.40-2.61		
Q3_4	3.16-3.30	Q5_4	3.34-3.56		
Q3_5	3.65-3.82	Q6	2.94-3.09		

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 184 CSOs participated in the survey from 23 June to 24 July 2020. The Office for Cooperation with Civil Society supported survey dissemination using its own channels of communication - mailing list of CSOs, newsletter, website, and social media. Moreover, Civic Initiatives supported dissemination by sending the survey link to its mailing list of CSOs, but also through the newsletters of its Resource Centre for Civil Society in Serbia.

To get as wider reach as possible, survey was additionally disseminated to coordinators and membership of working groups of the National Convention on the EU (NCEU). Finally, the questionnaire was also sent to the e-mail addresses in the CSO database maintained by the Ecological Movement Odzaci.

Table 13. Breakdown of the CSO survey sample in Serbia

	Frequency	% (of cases)
TOTAL	184	100
Key groups		
Type of organisation*		
Policy research/Think-tank	49	26.63
Watchdog	21	11.41
Advocacy	71	38.59
Service provider	60	32.61
Grassroot	46	25
Other	68	36.96
Field of operation*		
Governance and democracy	41	22.28
Rule of law	40	21.74
Human rights	86	46.74
Public administration reform	42	22.83
European integration	54	29.35
Gender issues	44	23.91
Children and youth	72	39.13
Environment and sustainable development	99	53.8
Education	79	42.93
Culture	48	26.09
Health	41	22.28
Media	31	16.85
Economic development	49	26.63
Civil society development	72	39.13
Social services	55	29.89
Other	26	14.13
Year of registration of the CSO		
Mean= 2005; Range=1951-2018		
Position of the respondent in the organisation*		
Senior-level management	133	72.28
Mid-level management	18	9.78
Senior non-management	7	3.8
Mid-level non-management	1	0.54
Other	27	14.67
Years working with the organisation		
Mean=10.76 years; Range=0-41 years		

*Multiple response questions. Calculating frequency totals may add up beyond the sample size (184), or total percentage of cases may add up beyond 100%.

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