

Western Balkan PAR Monitor

ORGANISATION, ACCOUNTABILITY AND OVERSIGHT

2024/2025



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ABOUT WEBER 3.0

Building upon the achievements of its predecessors, the WeBER (2015 – 2018) and WeBER 2.0 (2019 – 2023) projects, the **Western Balkan Enablers for Reforming Public Administrations – WeBER 3.0** project is the third consecutive EU-funded grant of the largest civil society-led initiative for monitoring public administration reform (PAR) in the Western Balkans. Its implementation period is February 2023 – July 2026. Guided by the SIGMA/OECD Principles, the first two phases of the initiative laid the foundation for WeBER 3.0's ambition **to further empower civil society organisations (CSOs) to contribute to more transparent, open, accountable, citizen-centric and thus more EU-compliant administrations in the WB region.**

WeBER 3.0 continues to promote the crucial role of CSOs in PAR, while also advocating for broader citizen engagement in this process and inclusive reform measures which are user-tailored and thus lead to tangible improvements. By grounding actions in robust monitoring data and insights, WeBER 3.0 will empower civil society to more effectively influence the design and implementation of PAR. To foster collaborative policymaking and bridge the gap between aspirations and actionable solutions, the project will facilitate sustainable policy dialogue between governments and CSOs through the WeBER Platform and its National PAR Working Groups. Finally, through small grants for local CSOs, WeBER 3.0 bolsters local-level PAR engagement, amplifying the voices of citizens – the final beneficiaries of the public administrations' work.

WeBER 3.0 products and further information about them are available on the project's website at www.par-monitor.org.

WeBER 3.0 is implemented by the Think for Europe Network (TEN), composed of six EU policy-oriented think tanks in the Western Balkans:



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By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level visibility.



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¹ A joint initiative of the European Union and the OECD.

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More information about the WeBER 3.0 project, the WeBER Advisory Council, members of the WeBER Platform and the project's partners can be found at www.par-monitor.org

EXECUTIVE SUMMARY

This report assesses the accountability and transparency of state administration by observing two aspects: 1) reactive transparency – freedom of information, and 2) proactive transparency. The first aspect assesses the extent to which effective reactive transparency is ensured through enforceable free access to information rights, institutional oversight, compliant responses by public authorities, effective sanctions, and public confidence in exercising the right to access information of public importance. The second aspect examines whether public administration bodies systematically publish comprehensive, up-to-date, accessible, and citizen-friendly information on their work, organisation, services, budgets, and decision-making processes, while also looking into open data availability.

All Western Balkan administrations have largely established comprehensive legal frameworks governing reactive transparency, i.e., the right of free access to public information, which broadly guarantee key procedural safeguards and are generally aligned with international standards. In addition, most administrations have adopted dedicated measures in their PAR strategies to strengthen freedom of information systems. However, the assessment has exposed implementation gaps across the region. Public authorities generally respond to FOI requests, provide the requested information, and do so free of charge; however, compliance with legal deadlines, requested response formats, and other procedural requirements varies considerably between administrations. Formal oversight mechanisms, embodied in dedicated supervisory oversight bodies, are in place throughout the region, yet with important transparency gaps, as these bodies provide limited information on imposed and executed sanctions in their annual reports. Only Serbia and North Macedonia report on the total number of sanctions imposed and executed, while no administration disaggregates this data by individual authority or authority type. While public awareness of the right to access information is relatively high across the region (70% on average), only half of the population confirms that supervisory institutions assist citizens in exercising FOI rights (52% on average). This gap, combined with key informants' low confidence in enforcement mechanisms, suggests that oversight bodies are not yet recognised as fully effective in ensuring compliance with FOI obligations.

Proactive transparency is generally supported by the PAR strategic frameworks and legal provisions across the WB. This includes requirements for publishing key information and, in most administrations, for making public data available

in open formats. However, implementation does not systematically follow established provisions. Based on the review of websites of five central state administration bodies in each WB administration, the assessment shows that information on institutional competences, legal acts, and organisational structures is commonly published, yet important categories such as general contact details and contacts of persons responsible for FOI, public services provided by the institution, impact assessments and public consultations, annual work reports and budget information are often incomplete, difficult to access, outdated, or insufficiently adapted for use by the general public. As a result, proactive disclosure practices continue to fall short of enabling meaningful public scrutiny and accountability of state administration bodies. In addition, open data publication remains at an early stage of development, with only a minority of sampled institutions regularly publishing open datasets. Similarly, availability of high-value datasets, defined by the EU framework as documents the re-use of which is associated with important benefits for society, the environment and the economy, has been uneven, with efforts largely focused on technical data publication rather than on systematically prioritising datasets identified as high-value by the EU framework. These findings are reinforced by the views of key informants, who frequently point to fragmented publication practices, poor usability of institutional websites, and difficulties in locating information. Lastly, public perceptions are divided, with half of citizens across the region (50% on average) reporting that they can easily find the information they need on government websites, while an average of 39% disagree and 11% are undecided. Overall, despite some progress in certain areas and administrations, proactive transparency remains inconsistently implemented, limiting public oversight of government activities.

LIST OF ABBREVIATIONS AND ACRONYMS

ALB	Albania
BIH	Bosnia and Herzegovina
CSO	Civil Society Organisation
EC	European Commission
EU	European Union
FOI	Freedom of Information
HVD	High Value Datasets
KS	Kosovo
MKD	North Macedonia
MNE	Montenegro
PAR	Public Administration Reform
ReSPA	Regional School of Public Administration
SIGMA	Support for Improvement in Governance and Management
SRB	Serbia
WB	Western Balkan
WeBER 3.0	Western Balkan Enablers for Reforming Public Administrations

I. WeBER PAR Monitor: What we monitor and how

I.1 WeBER's approach to monitoring PAR

The Public Administration Reform (PAR) Monitor methodology was developed in 2015-2016, as part of the first Western Balkans Enabling Project for Civil Society Monitoring of Public Administration Reform (WeBER) project. Since the onset, WeBER has adopted a markedly evidence-based approach in its endeavour to increase the relevance, participation and capacity of civil society organisations (CSOs) in the Western Balkans to advocate for and influence the design and implementation of PAR. The PAR Monitor methodology is a cornerstone WeBER product, enabling civil society monitoring of PAR based on evidence and analysis.

In line with WeBER's focus on the region's EU accession process, once the SIGMA *Principles of Public Administration* were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,² and on SIGMA Methodology,³ and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.⁴

² OECD (2023), *The Principles of Public Administration*, OECD Publishing, Paris, <https://doi.org/10.1787/7f5ec453-en>.

³ Available at: <https://www.sigmaweb.org/en/publications/documents/2024assessment-methodology-of-the-principles-of-public-administration.html>.

⁴ For detailed information on the scope and process of methodology revision please visit <https://www.par-monitor.org/par-monitor-methodology/>.

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE

In order to align with the new SIGMA methodological approach, the following structural changes are introduced:

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (i.e. specific criteria assessed), in order to streamline the approach and emphasise the focus on transparency, inclusiveness and openness in each PAR area.
- Introduction of types of sub-indicator elements, ensuring that all following aspects of reform are covered:
 - 1) Strategy and Policy,
 - 2) Legislation,
 - 3) Institutional Setup,
 - 4) Practice in Implementation, and
 - 5) Outcomes and Impact.
- Introduction of a 100-point scale, for a more nuanced assessment of progress in each PAR area.

DATA SOURCES

- Introduction of interviews with “key informants”, i.e. key non-state actors engaged and familiar with the processes. These interviews serve as a data source for the “Outcomes and Impact” elements instead of the formerly implemented survey of civil society organisations.
- More systematic use of public perception survey results as a data source for “Outcomes and Impact” elements and expanding the scope of the survey to complement the assessment in five PAR areas – all except “Strategy for PAR”.
- Removal of the survey of civil servants as a data source due to persistent issues with ensuring adequate response rates across the region’s administrations.

PAR MONITOR REPORTING

- Six national PAR Monitor reports, one per PAR area (36 in total for the entire PAR Monitor), in order to facilitate timely publication and advocacy for the monitoring results rather than publishing the results of 18 months of research at the end of the process.
- Six regional Western Balkan overview reports, one per PAR area (6 in total).

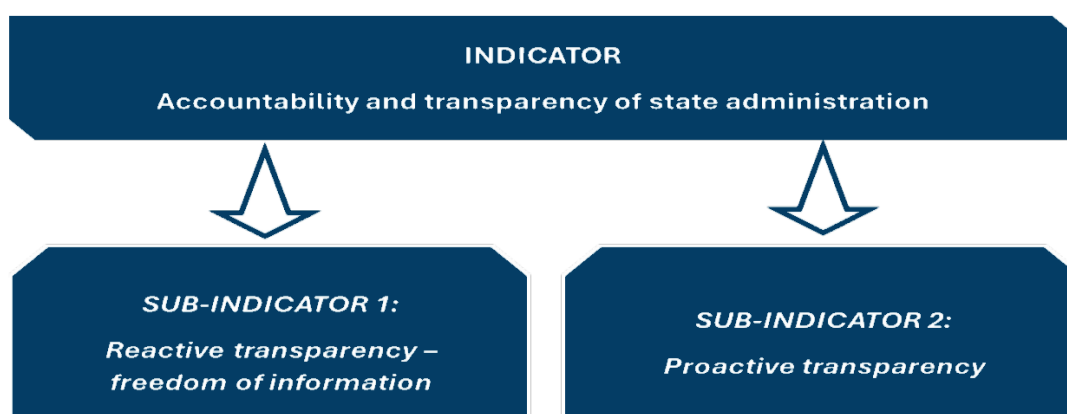
I.2 Why and how WeBER monitors the “Organisation, Accountability and Oversight” area

Access to information held by public authorities and the proactive disclosure of how those authorities work and make decisions determines how far government actions are open to external scrutiny, and how accountability in public administration functions in practice. When institutions publish information routinely and respond to requests in line with legal requirements, they demonstrate, in practice, the openness and service orientation they are required to uphold, and they reduce the information gap between the state and the public. Where delays, incomplete responses, and restricted access are common, this points to systemic weaknesses in administrative accountability and diminished space for external oversight. Monitoring this area aims to establish whether public administration operates in ways that let citizens and civil society access and scrutinise the decisions and activities of public authorities, and whether that scrutiny creates pressure for institutions to improve.

Monitoring in **the Organisation, Accountability and Oversight area** is based on one SIGMA Principle:

Principle 15: Public administration is transparent and open.

This Principle is assessed from the perspective of institutional transparency and responsiveness to information requests, including timely, properly formatted responses, justified refusals, and effective oversight and enforcement. The focus on transparency also examines if public administration bodies publish comprehensive, up-to-date, accessible and citizen-friendly information on their work.



The monitoring period for the Organisation, Accountability and Oversight covers developments since the last PAR Monitor cycle, which lasted from January until November 2022. Thus, this report reflects any developments since 2022 and primarily focuses on proactive transparency practices of public authorities during the monitoring window for this area (April-May 2026) as well as on their practices in responding to free access to information requests that research team submitted during the entire PAR Monitor cycle 2024/2025 which lasted from October 2024 until May 2026. Although this report provides a comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The **first sub-indicator**⁵ examines the extent to which the legal and institutional framework, implementation practices, and oversight mechanisms ensure the effective exercise of the right to access information of public importance. Monitoring of strategy and policy, and legislation is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions, while the assessment of practice is based on a sample of freedom of information requests submitted during the entire monitoring cycle of 2024/2025 (October 2024-May 2026) and the review of websites of the relevant supervisory institution. For the assessment of outcomes and impact, researchers conduct three key informant interviews with non-state actors who possess significant expertise in the area and utilise the public perception survey data.

5 The first sub-indicator focuses on the following SIGMA sub-principles: The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors; Individuals, including non-residents, and legal persons have the legal right to access public information without justifying their request; Public information encompasses all information recorded in documents held by the public administration, individuals or legal persons who exercise public authority. Exceptions exist only when there are compelling reasons for classifying information; they are set down precisely in law; The public administration helps parties to identify the requested information and provides it promptly in the requested format and free of charge, except for the cost of reproduction and delivery; The public administration communicates the grounds for refusal of access to public information, and parties have the right to appeal this decision to an independent body or the courts; Responsibility for monitoring compliance with the legislation on public information, providing guidance and imposing sanctions is clearly assigned and implemented.

Table 2: Indicator elements under sub-indicator 1

Indicator element: number and title	Type
E 1.1 There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and policy
E 1.2 Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation
E 1.3 Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation
E 1.4 Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation
E 1.5 Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation
E 1.6 Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional set-up
E 1.7 Responses to FOI are provided in requested format	Practice in implementation
E 1.8 Responses to FOI are provided within legally stipulated deadlines	Practice in implementation
E 1.9 Responses to FOI are provided free of charge	Practice in implementation
E 1.10 Public authorities submit information that was requested	Practice in implementation
E 1.11 Public authorities communicate grounds for refusal of access to information	Practice in implementation
E 1.12 Supervisory authority regularly publishes annual reports on application of freedom of information	Practice in implementation
E 1.13 Supervisory authority's annual reports include information on imposed and executed sanctions	Practice in implementation
E 1.14 Supervisory authority proactively publishes up-to-date citizen-friendly resources and fill-in forms for freedom of information	Practice in implementation
E 1.15 Key non-state actors consider supervisory authority's sanctions as transparent and effective	Outcomes and impact
E 1.16 Key non-state actors consider that public authorities adequately respond to requests with sensitive information and properly act when refusing access to information	Outcomes and impact
E 1.17 Citizens' perceived awareness of their right to access information of public importance	Outcomes and impact
E 1.18 Citizens' perception of institutional support in exercising the right to access information of public importance	Outcomes and impact

The **second sub-indicator**⁶ assesses the legal and strategic framework, as well as institutional practices, of proactive disclosure of key information concerning the work of public administration bodies, including publication of open data. Monitoring of strategy and policy, and legislation is performed by analysing strategic documents, legal acts and official data publicly available on the websites of relevant institutions. Assessment of practice type elements, performed during the monitoring window for this area (April-May 2026), is conducted based on a sample of five public administration bodies:

- Three line ministries (1 large, 1 medium, 1 smaller in terms of thematic scope)
- A ministry with a general planning and coordination function,
- A central-level service provider that is not a ministry, and that delivers public services to citizens (or citizens and businesses).

Assessment of outcomes and impact is based on key informant interviews and public perception survey data.

In the assessment of open data related elements 2.12 and 2.13, the adopted approach in this PAR Monitor cycle makes the distinction between *data formats* and *document formats*. The assessment focuses on publication of data format types, such as data spreadsheets, although document formats can be open standard as well. The reason is that document formats record how information is presented on a page, whereas data formats record what the values are and how they relate to one another. This follows closely Article 2(13) of Directive (EU) 2019/1024 on open data and the re-use of public sector information, which requires that software be able to extract specific data *and their internal structure*, and is consistent with W3C Data on the Web Best Practices (Best Practice 12)⁷ and with the guidance applied on data.europa.eu.

⁶ The second sub-indicator focuses on the following SIGMA sub-principles: The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors; Public administration bodies proactively disclose public information, which is relevant, complete, accurate and up to date, accessible, understandable, machine-readable, in open-format and reusable.

⁷ W3C Data on the Web Best Practices, available <https://www.w3.org/TR/dwbp/#dataFormats>.

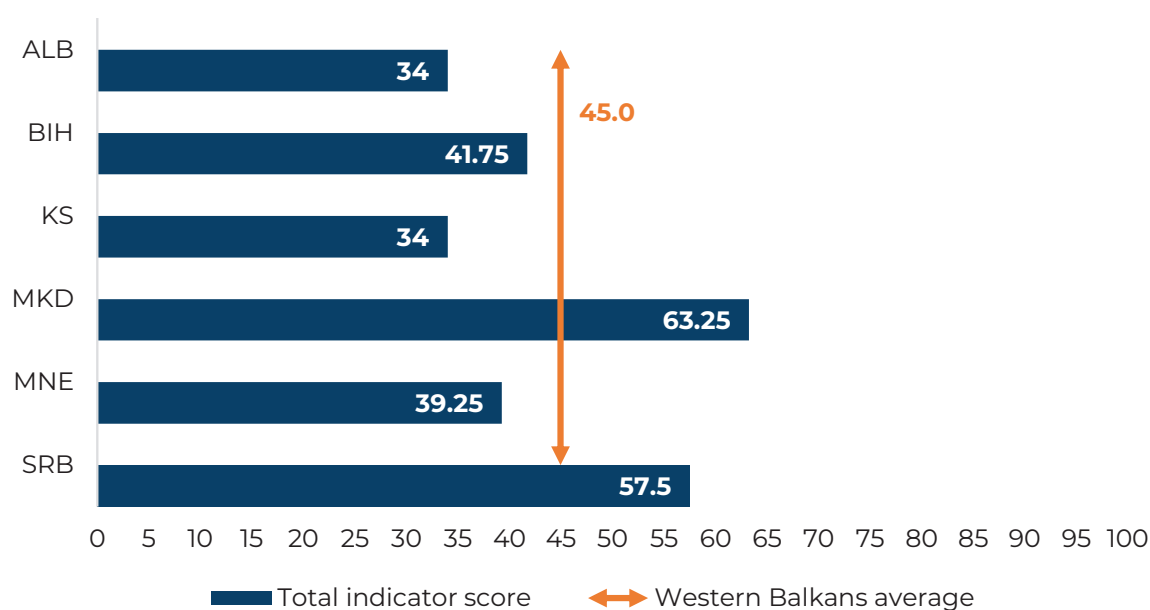
Table 3: Indicator elements under sub-indicator 2

Indicator element: number and title	Type
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy
E 2.2 Regulation stipulates proactive transparency obligations	Legislation
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible and citizen-friendly manner	Practice in implementation
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation
E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation
E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation
E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation
E 2.13 Public administration publishes high-value open datasets	Practice in implementation
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact

II. ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION

This section provides a comparative analysis of the assessment results for the six WB administrations. Each sub-section presents the results for one sub-indicator (two in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislative, and institutional framework, then moving to the practice in implementation, and finally outcomes and impact. Each sub-indicator assessment concludes with the presentation of awarded points. Detailed presentation of scores for each Western Balkan administration, and for each sub-indicator and their elements, is provided in the methodology appendix.

The graph below displays the overall results for the Organisation, Accountability and Oversight area, measured on a scale from 0 to 100 points.



National reports for the Organisation, Accountability and Oversight area for all WB administrations are available at: www.par-monitor.org

II.1 Reactive transparency – freedom of information

Principle 15: Public administration is transparent and open.

State of play

The latest SIGMA regional overview of PAR progress notes that, with the exception of BiH, strategic and legal frameworks governing transparency and access to public information are broadly aligned with international standards.⁸ However, the existence of an adequate legal framework has not translated into equally effective implementation. According to SIGMA, access to public information remains hindered in most administrations by procedural limitations, such as lengthy response deadlines and insufficient obligations for public authorities to assist applicants in identifying the requested information. More importantly, information is frequently disclosed only following a successful appeal, pointing to weaknesses in the first-instance application of access to information legislation. SIGMA also notes that, except in Kosovo, appeal mechanisms remain insufficiently effective and are generally not supported by systematic monitoring of their performance. In addition, in Montenegro and Serbia, the rising number of FOI requests and appeals has been driven largely by legal professionals submitting large volumes of requests specifically to trigger administrative silence and subsequent compensation claims. Such misuse of the legal rights has created considerable strain on both public authorities and oversight bodies and has affected the effectiveness and timeliness of access to information in practice.

Strategic commitment to improving reactive transparency is present in most Western Balkan administrations' PAR strategic frameworks. Albania, Montenegro, North Macedonia and Serbia explicitly recognise access to information, and the handling of freedom of information (FOI) requests as an area requiring further improvement. These administrations have translated strategic objectives into concrete measures, including strengthening the capacities of oversight bodies, amending legal frameworks, providing training for public officials, raising public awareness, and improving implementation and enforcement mechanisms related to access to information. In several cases (Albania, North Macedonia, Montenegro), the strategies also assign clear institutional responsibilities and define specific activities aimed at enhancing the practical exercise of the right to information. By contrast, BiH and Kosovo lack such measures in strategic documents that would adequately address

⁸ SIGMA country reports on the Assessment against the Principles of Public Administration for all WB countries, along with overview WB reports, are available at: <https://tinyurl.com/3uwz5dh7>.

reactive transparency. While both administrations include broader transparency-related objectives within their PAR frameworks, these predominantly focus on proactive disclosure of information. In BiH, the only relevant measure concerns an analysis of the legal and institutional framework for access to information, without any accompanying performance-oriented activities. Overall, the region demonstrates a growing recognition of reactive transparency as an important area for further improvements, although the extent to which this commitment is reflected in actionable strategic measures differs across the board.

Across the WB, all administrations have fully established legislation guaranteeing the right of both individuals and legal persons to access public information without the requirement to justify their request.⁹ This reflects a high degree of regional alignment with international standards on freedom of information, as the legal frameworks consistently extend this right not only to citizens but also to legal persons, including non-residents. In addition, all administrations explicitly define the full range of applicable exceptions to the right of access, thereby providing a structured legal basis for balancing transparency with legitimate restrictions such as privacy, national security or other protected interests. Importantly, each legal framework also includes the principle of partial disclosure, ensuring that information not covered by exceptions must be released wherever possible. Overall, the region demonstrates a mature legislative foundation for access to information rights, with no significant divergences across administrations at the level of formal legal guarantees.

In addition, legal frameworks across the region consistently regulate key procedural guarantees for handling FOI requests, particularly with regard to timeliness and cost. All administrations stipulate clear deadlines for the submission of responses to FOI requests, ensuring that public authorities are legally bound to respond within defined time limits. Likewise, all frameworks confirm that access to public information is provided free of charge, with only limited and regulated exceptions related to reproduction or delivery costs, which do not undermine the principle of free access. However, differences emerge in relation to the obligation to respond in the format requested by the applicant. BiH and Kosovo do not fully regulate this requirement within their legal frameworks, which creates a degree of asymmetry in procedural safeguards, as applicants in these two administrations may face limitations in exercising full control over the form in which information is provided. Overall, while the region shows a high level of convergence regarding deadlines and cost-free access, guarantees related to desired response format remain uneven, with BiH and Kosovo representing partial gaps in procedural alignment.

⁹ It should be noted that, for Montenegro, the assessment was based on the Law on Free Access to Information that was in force during the monitoring period. A new Law on Free Access to Information was adopted on 27 December 2025, but its application began only in July 2026, after the monitoring had been completed.

Furthermore, all administrations in the region have established a uniform legal requirement for public authorities to disclose the grounds for any refusal of access to information. This means that decisions denying FOI requests must be formally reasoned and explicitly linked to applicable legal exceptions defined in the respective legislation. Such provisions are consistently embedded across national access to information frameworks and serve as an important procedural safeguard against arbitrary decision-making. They also reinforce accountability by ensuring that applicants are informed of the legal justification for refusals, thereby enabling effective use of appeal and oversight mechanisms. The region demonstrates no divergences in terms of the obligation to provide reasons for refusal.

Also, legal frameworks in the region consistently incorporate sanctions as a preventive tool to ensure compliance with FOI obligations. These provisions apply both to public authorities as holders of public information and to persons responsible for managing public institutions, including heads of organisations. This reflects a consistent approach to ensuring accountability, where responsibility for non-compliance is not limited to public authorities as legal entities but extends to individual office holders in managerial positions.

Finally, all administrations in the region have established dedicated supervisory authorities responsible for monitoring the implementation of the right to access to public information. These bodies are formally mandated to oversee compliance with FOI legislation, ensuring that public institutions adhere to their legal obligations, as well as to impose measures in case of violation of FOI rights by public authorities. As a result of their oversight, supervisory authorities prepare reports on the implementation of FOI rights on an annual basis, which strengthens transparency and enables assessment of institutional performance in this area. Altogether, oversight and reporting functions of supervisory authorities for FOI contribute to a structured accountability framework across the region when it comes to free access to public information.

The assessment of practice and implementation of the FOI rights was based on empirical evidence collected through the entire PAR Monitor 2024/25 cycle. In particular, the analysis draws on a structured sample of FOI requests submitted between October 2024 and May 2026 to a range of public authorities across the region, including state administration bodies, public enterprises and other relevant public institutions. This approach enabled a comparative and evidence-based assessment of how legal provisions are applied in practice, beyond their formal existence in legislation. By focusing on actual responses to FOI requests, the monitoring captures key dimensions of implementation performance, such as responsiveness, completeness, and consistency in the application of access to information rules.

FOI implementation in practice reveals notable differences across the region, particularly with regard to the quality and timeliness of responses (Tables 4 and

5 below). Public authorities in BiH, Montenegro, North Macedonia and Serbia met the benchmark for responding to requests and providing information in the format requested by applicants in more than 90% of cases, while those in Albania and Kosovo fell below this threshold. Compliance with legally prescribed deadlines appears to be more challenging, with only public authorities in Serbia and North Macedonia meeting the same benchmark, indicating that delays in responding to requests remain a common issue across much of the WB region. All administrations provided requested information free of charge, while in terms of the substance of responses, all administrations provided the full information that was requested in the majority of cases. While North Macedonia stands out by exceeding the benchmark, with more than 90% of analysed responses containing the exact information that was requested, the corresponding share in the remaining administrations ranges from 63% in Kosovo to 88% in Montenegro. However, a less favourable picture emerges regarding the communication of grounds for refusal: only the public authorities in BiH met the relevant criterion, which shows that transparency in handling denied requests remains a weak point in most of the region. Overall, while public authorities generally allow access and provide requested data, documents and answers cost-free, differences persist in making sure that requests were responded to within statutory deadlines and that refusal grounds are transparent and sufficiently clear.

Table 4. Assessment of reactive transparency in practice

Criteria	ALB	BIH	KS	MKD	MNE	SRB
<i>At least 90% of FOI requests were responded to</i>	X	✓	X	✓	✓	✓
<i>At least 90% of FOI requests were responded in requested format ¹⁰</i>	X	✓	X	✓	✓	✓
<i>At least 90% of FOI requests were responded within legally stipulated deadlines</i>	X	X	X	✓	X	✓
<i>At least 90% of cases, information was provided free of charge</i>	X	✓	✓	✓	✓	✓
<i>At least 90% of responses contained information that was requested</i>	X	X	X	✓	X	X
<i>Grounds for refusal communicated in all cases where access was denied, OR no refusals in the entire body of analysed requests</i>	X	✓	X	X	X	X

¹⁰ Except for justified exceptions in which public authorities clearly indicated a lack of technical/logistical capabilities for doing so.

Table 5. Assessment of reactive transparency in practice (2)¹¹

Responses by public authorities (WB average %)								
Total requests	Responded	In requested format	Within legal deadline	With no cost	Contained full information	Refused	Refusal grounds provided	Administrative silence
WB								
100%	92,8%	99,7%	77,9%	100%	79,6%	1,6%	18,7%	8,5%
189	173	172	75	173	114	3	2	16
ALB								
100%	88,9%	100%	95,8%	100%	91,7%	/	N/A	11,1%
27	24	24	23	24	22	/	N/A	3
BiH								
100%	100%	100%	50%	100%	83,3%	/	N/A	/
6	6	6	3	6	5	/	N/A	/
KS								
100%	83,3%	100%	66,6%	100%	62,8%	/	N/A	16,7%
42	35	35	28	35	22	/	N/A	7
MKD								
100%	96,5%	100%	92,9%	100%	92,9%	/	N/A	3,7%
28	27	27	2	27	2	/	N/A	1
MNE								
100%	92,9%	100%	64%	100%	88%	7,7%	50%	7,1%
28	26	26	18	26	21	2	1	2
SRB								
100%	94,8%	98%	98%	100%	76,4%	1,7%	100%	5,2%
58	55	54	1	55	42	1	1	3

When it comes to transparency of work of supervisory authorities for FOI, specifically the extent to which their annual reports disclose information on enforcement outcomes, implementation of FOI legislation is largely institutionalised across the region. Most supervisory authorities regularly published annual reports throughout the observed period (2023–2025). The only exceptions are the supervisory authorities in Kosovo, where no annual report was identified for 2023, and North Macedonia, where the report for 2025 was not available at the time of assessment.¹² However, the content of these reports reveals gaps regarding the transparency of enforcement of FOI rights. Only the annual reports for Serbia and North Macedonia provide information on the total number of imposed and executed sanctions, while none of the administrations publishes more detailed data on sanctions segregated by either individual public authorities or by their type. As a result, although reporting practices are generally well established, the limited availability of

¹¹ See methodological appendix for more information on the body of FOI requests used as the sample for analysis in this sub-indicator.

¹² The supervisory authority was reportedly non-functional for approximately three months due to the failure to appoint a new director following the expiration of the previous director's mandate in December 2025.

sanction-related information restricts the ability to assess the effectiveness and consistency of FOI enforcement across the region.

Additionally, the availability of citizen-friendly resources and practical guidance for exercising FOI rights varies across the region. Supervisory authorities in Albania, North Macedonia and Serbia demonstrated the most proactive approach to supporting citizens through accessible guidance materials, published fill-in forms for different stages of the FOI procedure, aligned with the current legal framework. In Kosovo, the supervisory authority does not publish fill-in forms that cover the different procedural steps, while for the Montenegrin authority, although some supporting materials and forms are publicly available, citizen-friendly resources are missing. Overall, the findings suggest that most administrations recognise the importance of practical guidance in facilitating access to information, but the scope and accessibility of these resources still show insufficient proactiveness in providing citizen-friendly support for the exercise of FOI rights.

Good practices - Consistent implementation of FOI obligations in practice in North Macedonia

North Macedonia demonstrates good practice by combining timely responses to FOI requests with a high quality of information provision. It is one of only two administrations meeting the benchmark for responding within legally prescribed deadlines and the only administration where more than 90% of analysed responses contained the information requested. In addition, the supervisory authority reports on the total number of imposed and executed sanctions, while citizen-friendly guidance and standardised forms for FOI requests and filing complaints are also available online. Together, these elements reflect a relatively well-functioning FOI system that combines effective implementation with institutional support.

Practices to avoid - Limited availability of practical support for FOI applicants in BiH

BiH represents an example of limited practical support for citizens in exercising their right of free access to information. The assessment found that the supervisory authority does not proactively publish citizen-friendly guidance, standardised forms, or other up-to-date resources to facilitate the submission of FOI requests, reducing the accessibility of crucial information for citizens.

Perceptions of key informants point to significant challenges regarding the effectiveness and credibility of FOI enforcement mechanisms across the region (Table 6).¹³ Kosovo stands out as the only administration where all interviewed stakeholders consider supervisory authority's sanctions to be both transparent and effective. BiH performs somewhat better than the rest of the region, as all stakeholders agreed that sanctions are transparent; however, they all disagreed regarding their effectiveness. In Albania, Montenegro, North Macedonia, and Serbia, stakeholders expressed negative views regarding both the transparency and effectiveness of sanctions imposed by supervisory authorities. At the same time, when asked to reflect on how public authorities handle requests with sensitive information and refusals, interviewees appear to be consistently critical across all administrations. The vast majority of them express some form of disagreement that public authorities adequately respond to requests involving sensitive information or that they properly act when refusing access to information – a perception consistent with the finding from this PAR Monitor cycle that public authorities provided grounds for refusal in only 18.7% of analysed cases. Overall, these findings suggest that confidence in the enforcement of FOI legislation remains limited across the region, despite the existence of formal oversight and sanctioning mechanisms.

Table 6: Number of non-state actors' responses per agreement scale

Statement	Administration	Fully disagree	Tend to disagree	Tend to agree	Fully agree
Supervisory authority's sanctions are transparent	ALB		1	2	
	BiH			2	1
	KS			1	2
	MKD		1	2	
	MNE		3		
	SRB		1	1	
Supervisory authority's sanctions are effective	ALB		1	2	
	BiH	1	2		
	KS			3	
	MKD		1	2	
	MNE	3			
	SRB	2			

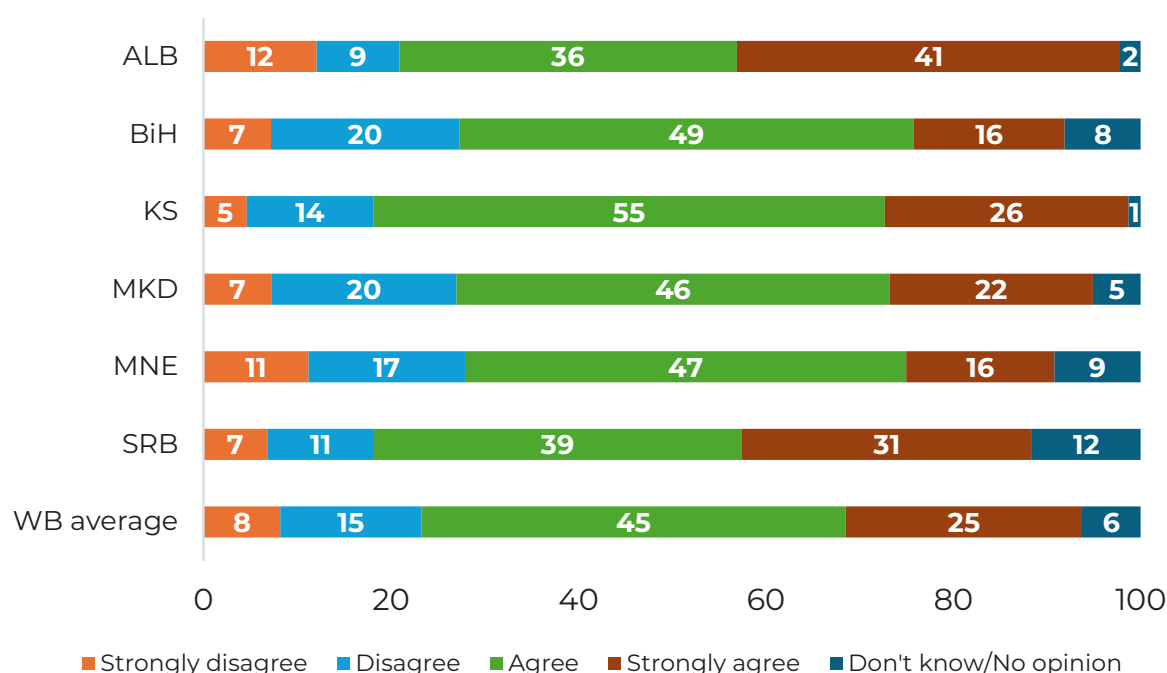
¹³ Researchers identified and interviewed relevant non-state actors with experience and knowledge in the field (key informants). Non-state actors are selected among representatives of civil society organisations, academia, professional organisations, media associations, investigative journalism outlets, or thematic experts. As a rule, three non-state actors were interviewed per administration for the statements.

Public authorities adequately respond to requests containing sensitive information	ALB	1	2		
	BiH	1	2		
	KS		2	1	
	MKD		2	1	
	MNE	3			
	SRB	1	1		
Public authorities properly act when refusing access to information	ALB		2	1	
	BiH		3		
	KS		2	1	
	MKD	3			
	MNE	1	2		
	SRB	1	1		

The public perception survey findings indicate that, on average, awareness of the right of access to information held by public authorities is high across the WB (70%), with a majority of citizens in all administrations recognising this right (Chart 1).¹⁴ The highest level of awareness is recorded in Kosovo, where more than 80% agree or strongly agree that they have the right to request and obtain information of public importance, followed by Albania (77%), Serbia (70%), and North Macedonia (68%). Awareness is somewhat lower in BiH (65%) and Montenegro (63%), although positive responses still clearly outweigh disagreement. At the same time, the results indicate that a substantial share of citizens in several administrations remain uncertain about this right, as reflected in the proportion of respondents selecting “Don’t know/ No opinion”, particularly in Serbia (12%), Montenegro (9%) and BiH (8%). Taken together, the findings suggest relatively well-established awareness of FOI rights throughout the region but also remind that informing and educating citizens about their rights and available accountability mechanisms need to be continuously ensured.

¹⁴ The survey was conducted between the 1st and 26th of February 2025 in all WB administrations, on a representative sample of 6077 citizens. For additional information, see the Methodology appendix. Public perception survey results were used to allocate points in the following manner: 0.5 points for 20%-40% of “agree” or “strongly agree” responses; 1 point for 40%-60% of “agree” or “strongly agree” responses; 1.5 points for 60%-80% of “agree” or “strongly agree” responses; 2 points for more than 80% of “agree” or “strongly agree” responses.

Chart 1: Share of citizens' responses on an agreement scale to the statement "I have the right to request and obtain information of public importance from public authorities" (%)

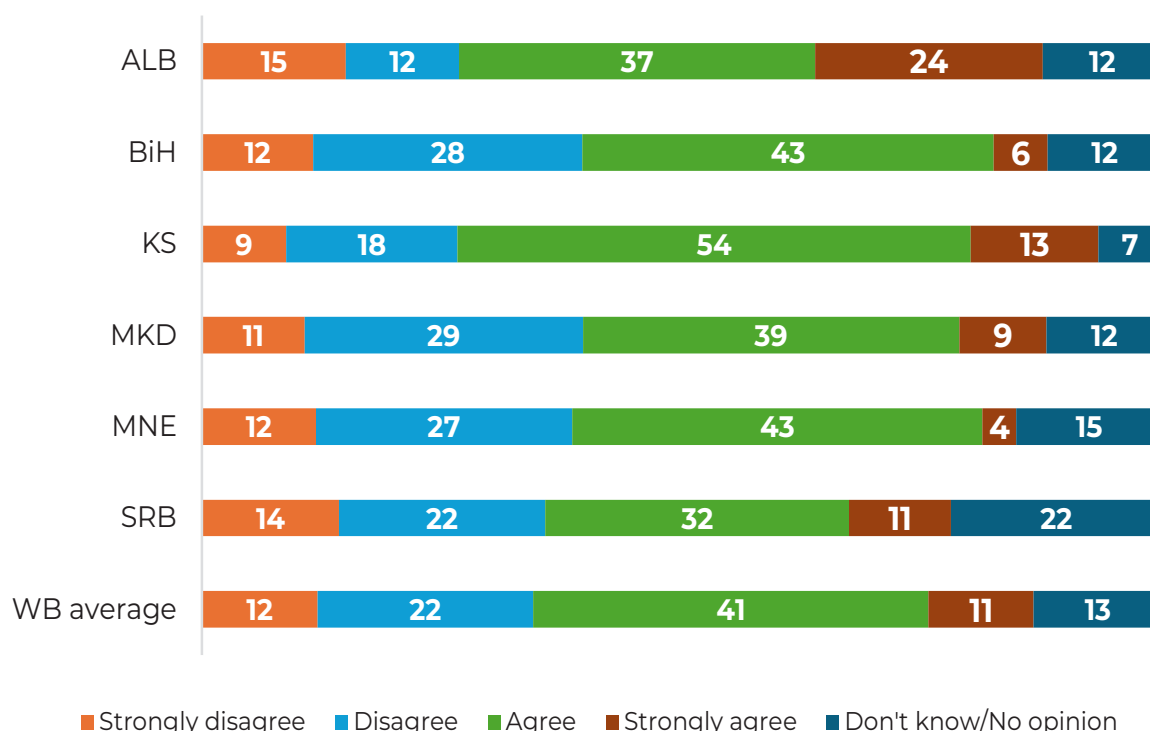


Note: All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 6077 for the entire Western Balkans.

Lastly, citizens' perception of institutional support in exercising FOI rights varies significantly across the region (Chart 2).¹⁵ On average, every second citizen across the region agrees or strongly agrees that the responsible FOI authority assists citizens in exercising this right. The highest levels of perceived institutional support are recorded in Kosovo (67%) and Albania (61%), where absolute majorities of the populations consider that the relevant oversight institutions are assisting citizens. In the rest of the region, relative majorities expressed positive perceptions: 48% in North Macedonia, 49% in BiH, 47% in Montenegro. Serbia recorded the lowest level of perceived support, with only 43% of citizens agreeing, yet still surpassing the negative perceptions by 7 percentage points. In sum, citizens in most WB administrations do perceive some level of institutional support, but the margin is narrow enough that this support cannot yet be described as strongly or consistently recognised.

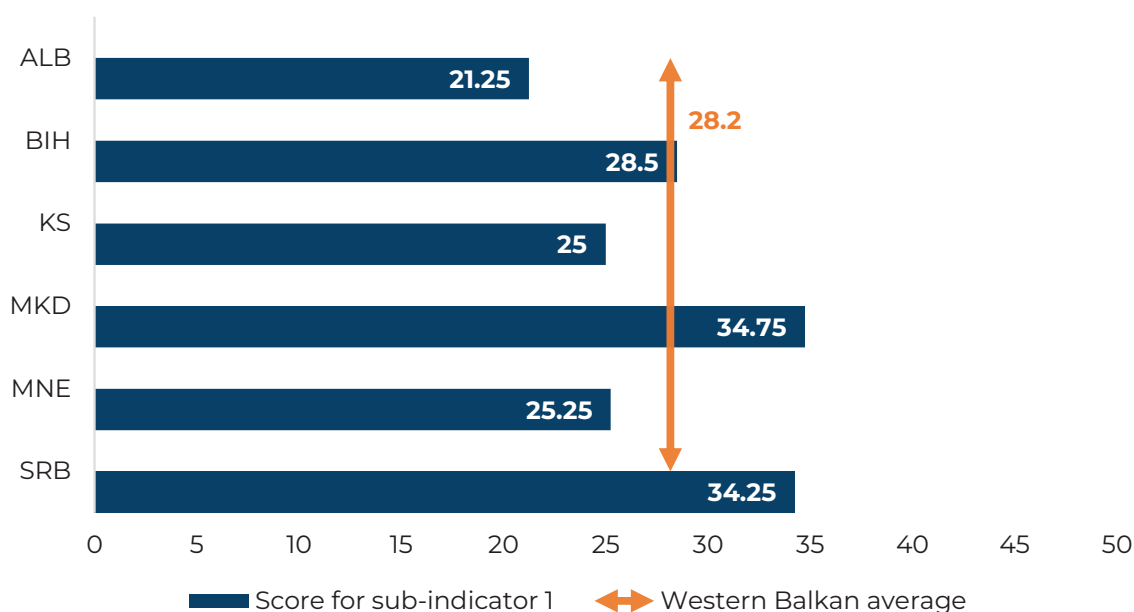
¹⁵ Public perception survey results were used to allocate points in the following manner: 0.5 points for 20%-40% of "agree" and "strongly agree" responses; 1 point for 40%-60% of "agree" and "strongly agree" responses; 1.5 points for 60%-80% of "agree" and "strongly agree" responses; 2 points for more than 80% of "agree" and "strongly agree" responses.

Chart 2: Share of citizens' responses on an agreement scale to the statement "The FOI responsible authority assists citizens in exercising their right to obtain information of public importance" (%)



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 = 6077 for the entire Western Balkans.

Sub-indicator 1: Reactive transparency – freedom of information (maximum score 49.75)



II.2 Proactive transparency

Principle 15: Public administration is transparent and open.

State of play

SIGMA's 2024 Western Balkans overview notes that, despite sound legal frameworks, proactive disclosure of information by public authorities remains limited.¹⁶ Specifically, compliance with proactive information sharing is inconsistent, and mechanisms for monitoring compliance are insufficient. At the same time, open data initiatives are expanding, with government-sponsored portals being developed. However, according to SIGMA, this has not yet translated into more substantial publication or reuse of open datasets.

PAR strategic frameworks across the Western Balkans include measures aimed at improving the proactive transparency of state administration. These typically combine legislative reforms, capacity-building activities, and practical measures, often including actions to strengthen open data governance and accessibility. In North Macedonia, for instance, transparency improvements are addressed through a dedicated Government Transparency Strategy that places proactive disclosure of information among the key reform priorities.¹⁷

At the same time, all administrations except BiH have established general requirements for proactive transparency in their legal frameworks. In all Western Balkan administrations, these provisions are found in laws regulating free access to information and related secondary legislation. Beyond general obligations, the five administrations' legislative frameworks explicitly specify the categories of information and documents that must be proactively published on institutional websites. Furthermore, in all administrations except North Macedonia and BiH, legal frameworks require that public authorities publish information in open formats. Open data publication requirements are in some cases regulated through legislation on e-government, as in Serbia, or through dedicated laws governing open data and the reuse of public sector information, as in Albania, or directly through the laws regulating FOI, examples being Kosovo and Montenegro. These obligations are general in nature as they do not refer to specific types of data to be opened.¹⁸ In Albania, for instance,

¹⁶ SIGMA country reports on the Assessment against the Principles of Public Administration for all WB countries, along with an overview WB report, are available at: <https://tinyurl.com/3uwz5dh7>.

¹⁷ Government Transparency Strategy 2023-2026, the Government of North Macedonia, available at: <https://portal.mdt.gov.mk/post-body-files/nacionalni-strategii-file-idF4.pdf>.

¹⁸ The Law on Free Access to Information in Montenegro prescribes proactive publication of key information and documents relating to the organisation, planning, decision-making, finances, and work of public authorities. See the Law on Free Access to Information here:

the legal framework also establishes that public sector bodies and public enterprises should, to the extent technically feasible, make data available for reuse immediately after collection.

However, where applicable, these standards are not yet fully reflected in practice, as public authorities do not consistently publish key information. The analysis of proactive disclosure is based on a review of the websites of five sampled central state administration bodies in each WB administration.¹⁹ It covers nine information items, which are assessed not only for availability but also against additional criteria: ease of access, timeliness of updates, and citizen-friendliness. Table 7 below provides an overview of the information included in the assessment, as well as detailed definitions of the criteria applied for each information item.

Table 7: Information assessed and the assessment criteria

CRITERIA				
INFORMATION	Availability	Timely/ updated	Accessible	Citizen friendly
<i>Scope of work</i>	available on the sample body's websites	/	not more than three clicks away from the homepage	not copy-pasted from legislation;
<i>Policy documents & legal acts</i>	lists of policy documents and legal acts are available	listed policy documents and legal acts are currently enforced		listed within specifically dedicated website locations, are consolidated and downloadable
<i>Public services</i>	list of services offered is available	all listed services can be obtained at the time of monitoring, upon check		FAQ sections on services available; for e-services, redirection link to the governmental portal for e-services
<i>Impact assessments & evaluations</i>	available for all policy sectors (at least one such document)	one impact assessment/ evaluation published in the last 2 calendar years		listed within purposefully dedicated website locations, and downloadable
<i>Work reports</i>	work report covering the entire scope of responsibility of is available	published in line with prescribed legal deadlines		introduction explaining the results of work in an understandable language or format, or it contains graphs/ illustrations/ infographics

¹⁹ Three line ministries, one ministry with general planning and coordination function, and one central-level service provider that is not a ministry, and who delivers public services to citizens (or citizens and businesses). For the entire sample, please see table 15 in methodology annex.

<i>Budget information</i>	financial plan for the current year and financial report for the previous year are available	financial plan is in line with the latest in-year budget amendments, if applicable	not more than three clicks away from the homepage	institutional citizen budget for the current calendar year available
<i>Contact information</i>	general contact information as well as FOI contacts are available	verification of one general contact and FOI contacts through phone calls or email		dedicated contact sections; no need for searching through documents or using search engine
<i>Organigram</i>	full organigram available	in line with the valid act on internal organisation		presented in a readable manner and downloadable
<i>Public consultations</i>	list of public consultation processes organised is available online (or there is a redirection link to a central consultation portal)	public consultation processes from the current and last calendar year are listed		public consultation processes are listed within a dedicated website location

Information on the scope of work is generally available online for those interested in understanding the purpose and competences of state administration bodies. However, dedicated sections on the scope of work are not consistently available across all sampled bodies, and where such information is published, it is often copied from the legal framework, making it difficult for non-expert audiences to understand. Still, information on the scope of work remains among the most consistently published categories within the assessment framework.

Similarly, valid legal acts and policy documents within the remit of sampled bodies are generally available online. North Macedonia stands out as the only administration where all sampled bodies met the assessment criteria in full, as they have made available online lists of currently enforced legal acts and policy documents that are consolidated, downloadable, accessible within three clicks from the homepage, and stored within dedicated website locations. In the rest of the region, information on legal acts and policy documents is generally available across sampled bodies, although not universally. At the same time, accessibility is not fully ensured, as is the case with Montenegro, while published lists of acts and documents in some cases tend to be largely outdated, examples being sampled bodies in Albania and Serbia. In addition, except for North Macedonia, all other administrations mostly fail to present this information in a citizen-friendly fashion, as legal and policy documents are not always organised in dedicated sections and, in some cases, are not published as consolidated versions, as observed in Albania, Kosovo, and Montenegro. Thus,

while state administration bodies tend to be proactive in this regard, limited user orientation and accessibility may hinder efficient access to relevant documents.

By contrast, proactive disclosure of information on public services remains considerably weaker. Albania and North Macedonia demonstrate the most developed practices, with sampled bodies most consistently publishing information on the services they provide. Even in these administrations, however, citizen-friendly features are often lacking, as service descriptions are rarely accompanied by frequently asked questions, practical guidance, or links to central government service portals. In the rest of the region, such information is considerably less available: only three sampled bodies in Serbia and two each in Kosovo and Montenegro provide information on services. In BiH, the Agency for Identification Documents, Registers and Data Exchange is the only sampled state-level institution that publishes service-related information in a timely, accessible, and citizen-friendly manner. Given the strategic commitment across the region to build modern, transparent, and citizen-centred public administrations, the limited proactive disclosure of information on public services suggests that these ambitions have yet to be translated into practice at the level of individual service providers.

Along these lines, impact assessment and evaluation documents remain only sporadically available on the websites of sampled bodies. In Albania and BiH, no such documents were identified across the sampled institutions. In Kosovo and North Macedonia, the Office of the Prime Minister and the Ministry of Environment and Physical Planning, respectively, are the only sampled institutions that proactively and accessibly publish recent impact assessments through dedicated online sections. Publication practices are more developed in Montenegro and Serbia, where four out of five and three out of five sampled bodies, respectively, publish impact assessments or evaluations. However, notable shortcomings remain. In Montenegro, accessing these documents typically requires navigating through more than three clicks, while in Serbia their availability on the websites of three ministries is limited to certain policy areas and not the entire scope of the institutions' work. Overall, there is no established regional standard or clear pattern for proactively disclosing impact assessments and evaluations, and publication practices remain fragmented.

Assessment of the online availability of annual work reports reveals mixed practices across the region. The lowest level of proactivity was recorded in Albania and Kosovo, where only one sampled body, the National Business Centre and the Tax Administration, respectively, published annual work reports that were both timely and easily accessible. These reports also included citizen-friendly features, such as simplified language and visual presentation of data. Sampled bodies in North Macedonia and BiH demonstrated somewhat stronger practices, with two and four institutions, respectively, publishing annual reports. Despite the better availability of these documents in BiH, they

are rarely published within legally prescribed deadlines and are generally not accompanied by citizen-friendly summaries or visual elements. Montenegro and Serbia once again show comparatively stronger performance, with annual reports available for all sampled bodies although with limited accessibility or citizen-friendliness. Taken together, the limited transparency of annual work reports across the region, also identified in previous PAR Monitor cycles, continues to constrain public scrutiny and weaken the ability to hold state administration bodies accountable for their work and results.

Budget information remains among the least transparently disclosed categories across the region. In half of the administrations, sampled bodies do not fully publish recent budget plans and budget execution reports. More specifically, in Kosovo and Montenegro, none of the five sampled bodies met the assessment criteria, while in Albania the National Business Centre was the only sampled institution to publish budget information in a complete, timely, accessible, and citizen-friendly manner. Budget information is more widely available in the remaining administrations, but the results still fall short of a standard of proactive budget transparency. In BiH and North Macedonia, only two out of five sampled bodies fully disclosed budget information, and none provided citizen budgets or comparable user-friendly explanations. Serbia demonstrates the strongest performance comparatively, with three out of five sampled bodies publishing budget information in a timely and accessible manner, although citizen-friendly approaches are similarly absent. It is noteworthy that general citizen budgets are mostly available across the region, published by ministries responsible for finance; however, these documents do not necessarily present budgetary data by individual budget users and the line institutions do not share or provide links to these documents on their websites. Together with the limited availability of annual work reports, weak proactive disclosure of budget information reaffirms the absence of some of the most basic preconditions for public accountability across the WB.

Furthermore, organigrams and contacts represent essential pieces of information that citizens and business can use to identify relevant persons and organisational units to get in touch with. Still, these are not universally and accessibly present. First, contact information – both the general institutional contacts and the contacts responsible for free access to information requests – is often not fully disclosed. Sampled bodies in North Macedonia demonstrate the strongest overall compliance with the assessment criteria. Elsewhere in the region, however, contact information is frequently incomplete, scattered across websites, or does not meet the criteria of accessibility, timeliness, and citizen-friendly presentation. In Albania, the National Business Centre is once again the only sampled body that fully meets all assessment criteria. In BiH and Montenegro, none of the sampled bodies publishes complete information for both types of contact points, although available contact details are generally accessible and located in

dedicated contact sections. In Kosovo and Serbia, two out of five sampled bodies provide complete contact information, albeit with varying levels of accessibility and update. Second, regarding organigrams, the visual organisational structures of sampled bodies, the findings suggest more robust practices. In BiH, North Macedonia, and Serbia, sampled bodies generally publish them in line with the assessment criteria, with few exceptions. Kosovo and Albania follow, with three out of five sampled bodies assessed as largely compliant. In both these administrations, shortcomings are mainly related to outdated organigrams that are not fully aligned with the currently valid acts on internal organisation and systematisation. Montenegro stands out as the weakest performer in this area, as none of the sampled bodies published a complete organigram online. The diversity of practices observed and the absence of a uniform approach to publishing contact information and organigrams suggest that proactive disclosure is neither fully nor consistently practised, reducing the visibility, accessibility, as well as external accountability of institutions.

The extent to which implemented public consultations are proactively presented online substantially differs among administrations in the region. Albania and Serbia stand out as the strongest performers, with sampled bodies generally providing easily accessible information on recently conducted public consultations through dedicated sections of their websites. In both administrations, only one sampled body failed to fully meet the assessment criteria. In BiH and North Macedonia, two out of five sampled bodies demonstrated full compliance with the criteria, while in Montenegro this was the case for three out of five. By contrast, no traceable information on either ongoing or completed public consultations was identified on the websites of sampled bodies in Kosovo. As meaningful stakeholder participation in policymaking depends on timely and complete information about consultation opportunities and outcomes, there is still considerable room for improving transparency in this area.

Additionally, in line with the findings from previous monitoring cycles, sampled bodies still do not regularly publish open datasets, although publication of documents in open formats has improved. Overall, out of all sampled bodies in the region (30), 14 have proactively published at least one open dataset, either through national open data portals or their own websites. At the administration level, North Macedonia and Serbia lead, with four out of five sampled bodies publishing open data, followed by Albania (three), Montenegro (two), and Kosovo (one). In BiH, there is no evidence of publication of data in open formats by sampled bodies, and the national open data portal is not yet established. Open data practices remain at an early-to-moderate stage of development, and it is still premature to speak of regular and systematic production and dissemination of open datasets. This in turn means that preconditions for further data reuse, potentially for creation of new services or other societal benefits, are still underdeveloped.

Practices to avoid - Gaps in Machine-Readable Data Publication Practices

The **Ministry of Culture and Media in Montenegro** represents a regional **practice to be avoided**, as it [publishes almost exclusively PDF documents](#) on the national Open Data Portal. Moreover, the published files do not contain structured datasets, but rather legal acts and other working documents.

In line with the applied monitoring methodology, “machine-readable format” refers to file formats structured in a way that enables software applications to easily identify, recognise, and extract specific data, including individual statements of fact and their internal structure. Such formats include commonly used open data standards with high levels of usability and adaptability, such as XML, XLSX, XLS, ODS, CSV, TSV, and JSON.

In line with the adopted approach in this PAR Monitor, the distinction is drawn here between *data formats* and *document formats*. A format can be entirely open and still be unsuitable for publishing data. For example, national budget may be published as a PDF, an open format by its own definition, while remaining an inconvenient form for open data. The reason is that document formats record how information is presented on a page, whereas data formats record what the values are and how they relate to one another. Spreadsheets, for example, fall on the data side since they store typed values in a defined grid. This follows closely Article 2(13) of Directive (EU) 2019/1024 on open data and the re-use of public sector information, which requires that software be able to extract specific data and their internal structure, and is consistent with [W3C Data on the Web Best Practices](#) (Best Practice 12) and with the guidance applied on data.europa.eu.

Apart from standard open data publication, assessment considered whether high-value datasets (HVD), defined by the EU framework as documents the re-use of which is associated with important benefits for society, the environment and the economy, are available in the WB administrations.²⁰ Across the six thematic categories defined by the EU framework, the assessment of availability

²⁰ According to the 2019/1024 EU Directive, high-value datasets are “documents the re-use of which is associated with important benefits for society, the environment and the economy, in particular because of their suitability for the creation of value-added services, applications and new, high-quality and decent jobs, and of the number of potential beneficiaries of the value-added services and applications based on those datasets”. Thematic categories of high-value datasets are: 1. Geospatial; 2. Earth observation and environment; 3. Meteorological; 4. Statistics; 5. Companies and company ownership; 6. Mobility. Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast), available at: <https://eur-lex.europa.eu/eli/dir/2019/1024/oj/eng>. Commission Implementing Regulation (EU) 2023/138 of 21 December 2022 laying down a list of specific high-value datasets and the arrangements for their publication and re-use, is available at: https://eur-lex.europa.eu/eli/reg_impl/2023/138/oj/eng.

of HVD reveals mixed results too. No available datasets were assessed as HVD in Albania or BiH, while some datasets that meet this definition were identified in the remaining administrations. Although many are publicly accessible in machine-readable formats, together with API endpoints i.e., web addresses through which data can be accessed automatically by software applications, published data tend to be more aligned with the EU framework's technical requirements than with its thematic priorities, in that they often consist of statistical tables, reports, or aggregated data rather than the specific dataset types envisaged. This is particularly evident in the meteorological and environmental domains, where available datasets frequently take the form of statistical outputs rather than operational observation data. Stronger alignment was observed in areas such as geospatial data and core statistics. While North Macedonia and Montenegro demonstrate solid performance, Serbia provides examples of stronger HVD focus across several thematic categories, including geospatial, environmental, statistical and company-register data which indicates a broader institutionalisation of HVD publication practices. In sum, findings suggest that efforts across the region are still insufficiently focused on systematic prioritisation and dissemination of the specific HVD identified by the EU framework. The table 8 below provides an overview of the assessment results.

Table 8: Publication of high values datasets

	Geospatial	Earth observation and environment	Meteo- rological	Statistics	Companies and company ownership	Mobility
ALB	X	X	X	X	X	X
BIH	X	X	X	X	X	X
KS	X	X	✓	X	X	X
MKD	✓	✓	X	✓	X	X
MNE	✓	X	X	✓	X	✓
SRB	✓	✓	X	✓	✓	X

Illustrative examples of publishing datasets aligned with the HVD framework

Serbia – Register of Companies API. The Business Register Agency provides [company register data](#) through an API-enabled service supporting machine-readable access and bulk download. The dataset corresponds directly to one of the **company and company ownership** dataset types prioritised by the EU HVD framework and represents an example of economically relevant public sector information made available for automated reuse.

North Macedonia – Transport Networks dataset. Available through [the national spatial data infrastructure \(NIPP\)](#) geoportal, the transport networks dataset represents an example of interoperable **geospatial data dissemination**, aligned with the Infrastructure for Spatial Information in the European Community (INSPIRE), thus reflecting the objectives underpinning the EU HVD framework.

Montenegro – Average Annual Daily Traffic. Available through Montenegro's open data portal, this dataset provides information on [traffic volumes across the national road network](#). Published in machine-readable format and accompanied by structured metadata and API access, it demonstrates the use of open-data infrastructure to support the accessibility and reuse of transport-related information relevant to the **mobility category** of the EU HVD framework.

Key informants' opinions across the region largely diverge on whether information proactively published on the websites of public authorities is presented in a citizen-friendly manner (see Table 9).²¹ Clear disagreement prevails among interviewees in BiH, Kosovo, and Montenegro, while views in Albania, North Macedonia, and Serbia tend to be more positive or are divided.²² North Macedonia stands out as the only administration where all key informants expressed a tendency to agree. Nevertheless, even they identified significant barriers, including difficulties navigating public authorities' websites due to the lack of meaningful structure and effective search functionalities, highlighting

21 Researchers identified and interviewed relevant non-state actors with experience and knowledge in the field (key informants). Non-state actors are selected among representatives of civil society organisations, academia, professional organisations, media associations, investigative journalism outlets, or thematic experts. As a rule, three non-state actors were interviewed per administration for the statements.

22 For Serbia, as a result of unresponsiveness by several contacted candidates, only two key informants were interviewed. The two interviewed key informants expressed differing views on whether information proactively published on the websites of public authorities is presented in a citizen-friendly manner. Under the assessment methodology, all three key informants must express agreement for a point to be awarded. As one of the two interviewees tended to disagree, the score for Serbia would remain 0 even if there was a third key informant and regardless of his/her opinion.

the need for further standardisation. Other shortcomings mentioned by interviewees include broken links, selective updating of information, and difficulties locating specific content. In many cases, respondents noted that it is easier to find information through a general web search engine than by navigating the website itself. Overall, many key informants across the region consider current proactive publication practices insufficient for adequately informing the public, due to which members of the public frequently have to resort to the use of the right of access to information to obtain relevant data.

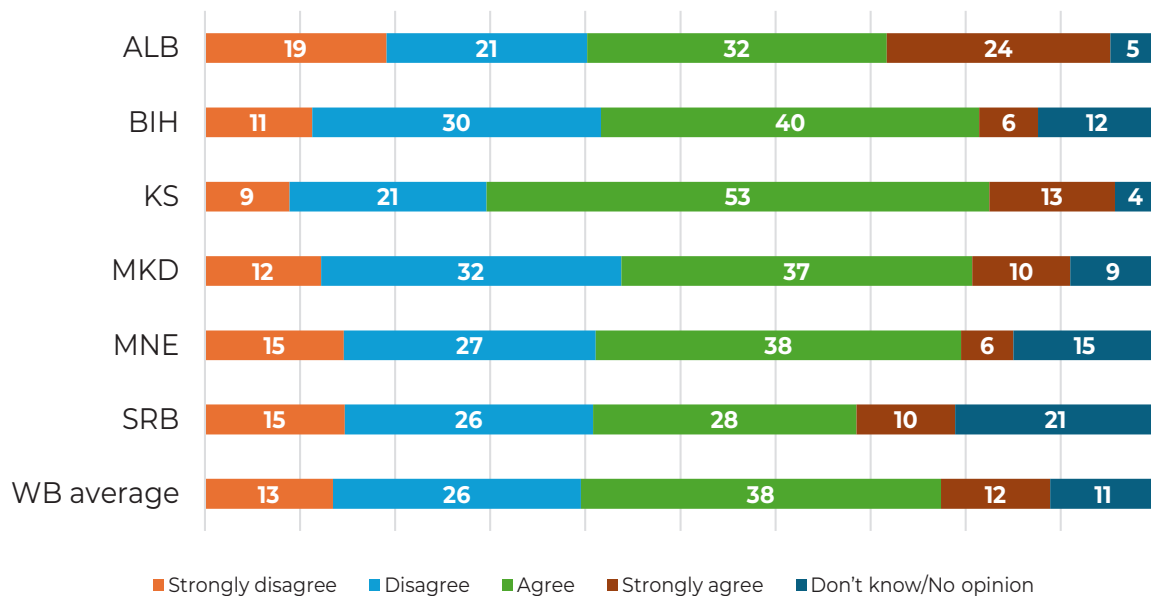
Table 9: Number of non-state actors' responses per agreement scale

Statement	Administration	Fully disagree	Tend to disagree	Tend to agree	Fully agree
Public information that is proactively published online, on websites of public authorities, is citizen friendly.	ALB		1	2	
	BIH		3		
	KS		3		
	MKD			3	
	MNE		3		
	SRB		1	1	

Public perception survey results reveal divided views regarding the availability of information on the websites of public authorities (see Chart 3 below).²³ When asked whether they can easily find the information they need on the websites of public authorities and the Government, exactly half of respondents across the region expressed agreement (50% agreed or strongly agreed), while 39% disagreed and 11% responded that they did not know. However, significant differences exist across administrations. In Albania and Kosovo, a majority of citizens expressed agreement with the statement (56% and 66%, respectively), while Serbia recorded the least favourable results, with only 38% of respondents expressing agreement and the highest share of “don’t know” responses in the region (21%). Such public perceptions confirm the uneven and insufficiently developed proactive publication practices identified in the website analysis and through key informant interviews.

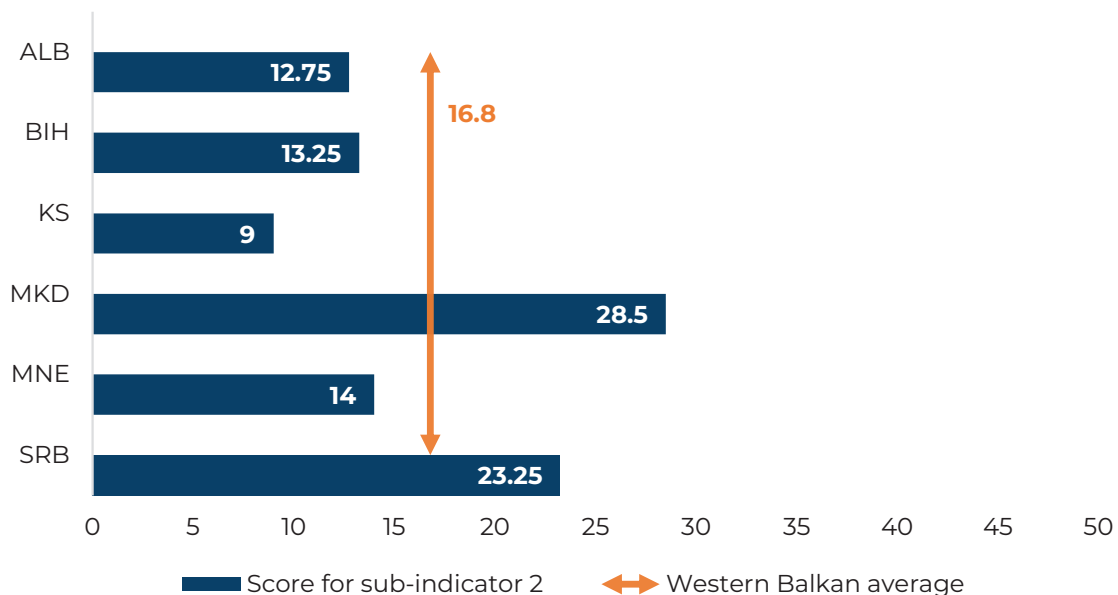
²³ Public perception survey results were used to allocate points in the following manner: 0.5 points for 20%-40% of “agree” and “strongly agree” responses; 1 point for 40%-60% of “agree” and “strongly agree” responses; 1.5 points for 60%-80% of “agree” and “strongly agree” responses; 2 points for more than 80% of “agree” and “strongly agree” responses.

Chart 3: Share of citizens' responses per agreement scale on the statement: I can easily find the information I need on the websites of public authorities and the Government (%)



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 = 6077 for the entire Western Balkans.

Sub-indicator 2: Proactive transparency (maximum score 50.25)



III. CONCLUSION

Reactive transparency in the Western Balkans: strong legal foundations and implementation gaps go hand in hand

The assessment of reactive transparency across the WB shows that strong legal foundations coexist with uneven and often insufficient implementation. At the legislative level, all six administrations guarantee the right of individuals and legal persons to access public information without justifying their request, define applicable exceptions, and include the principle of partial disclosure. Procedural safeguards relating to deadlines, cost-free access, and the obligation to provide reasons for refusal are similarly well established across the region, with only BiH and Kosovo showing gaps in guaranteeing responses in the format requested by applicants. Supervisory authorities exist in all administrations as well, and sanctions for non-compliance are consistently embedded in FOI enforcement systems. Evidence suggests, on the other hand, that this framework does not translate into consistent practice. Only Serbia and North Macedonia meet legally stipulated response deadlines and report regularly on sanctions enforcement, suggesting that in the remaining administrations, existing enforcement mechanisms function as formal requirements instead of accountability tools. This implementation deficit is reflected in low confidence of key non-state actors in FOI enforcement across the region. Meanwhile, although public awareness of FOI rights is relatively high (70% regional average), perception of institutional support provided by FOI supervisory bodies shows polarising views (a regional average of 52% of citizens who agree that such support is provided), pointing to a disconnect between citizens' awareness of their rights and their trust in the institutions tasked with upholding them.

Empirical evidence exposes two distinct weaknesses across most of the region: compliance with legally prescribed response deadlines and the failure to communicate grounds for refusal. The latter carries greater consequences for citizens, as applicants denied access without receiving a full and clear legal justification cannot meaningfully assess or challenge the refusal through available appeal mechanisms. These two gaps call for capacity-oriented measures and stronger scrutiny of refusal practices by FOI supervisory bodies. Additionally, public scrutiny of FOI practices, and consequently greater government accountability, also depend on supervisory authorities regularly publishing disaggregated data on sanctions that would allow the interested public to identify where non-compliance is concentrated. Also, since lower perceptions of institutional support suggest that FOI supervisory bodies are

not producing sufficiently tangible assistance for citizens, increased public-facing activities could help bridge this perception gap. In that sense, provision of accessible and up-to-date resources tailored to citizens, particularly fill-in forms and procedural guidance aligned with current legislation, remains an addressable barrier to more effective exercise of FOI rights.²⁴

Proactive transparency in the Western Balkans: a call for more results- and citizen-oriented proactive disclosure of information

In terms of proactive transparency, PAR strategic frameworks and regulations across the region provide a solid basis, with most administrations establishing clear obligations to publish key information and, increasingly, to make public data available in open formats. In practice, information on institutional competences, legal acts and organisational structures is generally available, whereas disclosure of information such as annual work reports, budget information, impact assessments, public consultations as well as open datasets remains inconsistent. Furthermore, where information is published, it is often difficult to locate, insufficiently updated or presented in ways that are not accessible to non-expert users. Progress in open data has also been uneven, with publication efforts focusing primarily on technical availability rather than on systematically providing high-value datasets. These findings are reflected in both perceptions of non-state stakeholders and the public, thus confirming persistent shortcomings in the accessibility, usability and transparency of public authorities' online information.

Building on the legal and strategic foundations already in place, a stronger focus on implementation would significantly improve transparency, accountability and the practical usability of public information across the WB. Namely, governments across the region should prioritise the consistent implementation of existing proactive transparency obligations by ensuring that key information is published regularly, in a timely manner and in formats that are easy to locate, understand and reuse. Consistency in proactively publishing information would also help reduce the burden of FOI requests as more information would already be available online. Attention, in particular, should be given to strengthening disclosure of annual work reports, budget information, impact assessments and public consultation processes. At the same time, greater emphasis should be placed on citizen-oriented communication through plain language, summaries and visual presentations, alongside more systematic publication of machine-readable and high-value datasets in line with the EU framework.

²⁴ It should also be noted that the FOI requests submitted during this monitoring cycle did not target particularly sensitive policy areas, such as internal affairs or national security. Therefore, the response rates and compliance levels documented here likely represent the more favourable end of the spectrum, with more pronounced weaknesses to be expected for information requests on politically or institutionally sensitive matters.

The monitoring findings on both reactive and proactive transparency show that the Western Balkans' main transparency challenge lies in implementation and enforcement. Across the region, legal frameworks guarantee the right of access to information, establish supervisory bodies, prescribe proactive disclosure obligations, and increasingly provide for open data. Yet, the evidence presented in this report demonstrates that these frameworks do not consistently deliver their intended outcomes. Citizens continue to face administrative silence, proactively published information is often difficult to access or use, and stakeholders perceive oversight institutions as insufficiently effective in safeguarding transparency rights. The next phase of reform should therefore focus on implementation of legal standards by public authorities and effective enforcement by the institutions responsible for oversight. Closing this implementation gap is ultimately a rule of law issue, as legally guaranteed rights under FOI legislation have limited value if public authorities do not comply with them and oversight bodies do not ensure their enforcement. As SIGMA assessments also demonstrate, this challenge affects both frontrunners and laggards in the accession process, making effective implementation and enforcement of reactive and proactive transparency rules a key challenge for the region in meeting EU membership criteria.

METHODOLOGY APPENDIX

OVERVIEW OF COUNTRY SCORES PER EACH INDICATOR ELEMENT

Table 10: Score for sub-indicator 1 – *Reactive transparency – freedom of information*

Sub-indicator elements	Element type	Maximum points	ALB	BIH	KS	MKD	MNE	SRB
E 1.1 There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and policy	0.25	0.25	0	0	0.25	0.25	0.25
E 1.2 Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation	2.5	2.5	2.5	2.5	2.5	2.5	2.5
E 1.3 Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation	1.5	1.5	1	1	1.5	1.5	1.5
E 1.4 Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation	1	1	1	1	1	1	1
E 1.5 Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation	1	1	1	1	1	1	1
E 1.6 Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional set-up	1	1	1	1	1	1	1
E 1.7 Responses to FOI are provided in requested format	Practice in implementation	3.5	0	3.5	0	3.5	3.5	3.5
E 1.8 Responses to FOI are provided within legally stipulated deadlines	Practice in implementation	4	0	0	0	4	0	4
E 1.9 Responses to FOI are provided free of charge	Practice in implementation	4	0	4	4	4	4	4

E 1.10 Public authorities submit information that was requested	Practice in implementation	4	2	2	2	4	2	2
E 1.11 Public authorities communicate grounds for refusal of access to information	Practice in implementation	4	0	4	0	0	0	0
E 1.12 Supervisory authority regularly publishes annual reports on application of freedom of information	Practice in implementation	4.5	4.5	4.5	3	3	4.5	4.5
E 1.13 Supervisory authority's annual reports include information on imposed and executed sanctions	Practice in implementation	4	0	0	0	2	0	2
E 1.14 Supervisory authority proactively publishes up-to-date citizen-friendly resources and fill-in forms for freedom of information	Practice in implementation	4.5	4.5	0	3	4.5	1.5	4.5
E 1.15 Key non-state actors consider supervisory authority's sanctions as transparent and effective	Outcomes and impact	3	0	1.5	3	0	0	0
E 1.16 Key non-state actors consider that public authorities adequately respond to requests with sensitive information and properly act when refusing access to information	Outcomes and impact	3	0	0	0	0	0	0
E 1.17 Citizens' perceived awareness of their right to access information of public importance	Outcomes and impact	2	1.5	1.5	2	1.5	1.5	1.5
E 1.18 Citizens' perception of institutional support in exercising the right to access information of public importance	Outcomes and impact	2	1.5	1	1.5	1.0	1.0	1.0
Total points		49.75	21.25	28.50	25	34.75	25.25	34.25

Table 11: Score for sub-indicator 1 – *Proactive transparency*

Sub-indicator elements	Element type	Maximum points	ALB	BIH	KS	MKD	MNE	SRB
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy	0.25	0.25	0.25	0.25	0.25	0.25	0.25
E 2.2 Regulation stipulates proactive transparency obligations	Legislation	1.5	0.5	0	1.5	1.0	1.5	1.5
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation	3	2	2	0	3	2	2
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation	4	0	3	3	4	0	3
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation	4	1	0	0	3	0	0
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation	4	0	0	0	0	3	0
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible and citizen-friendly manner	Practice in implementation	4	0	1	0	0	2	3
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation	4	0	0	0	2	0	2
E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation	4	3	3	2	3	2	0

E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation	4	0	3	0	4	0	4
E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation	4	4	0	0	2	0	4
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation	4	0	0	0	0	0	0
E 2.13 Public administration publishes high-value open datasets	Practice in implementation	4.5	0	0	0.75	2.25	2.25	3
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact	3	0	0	0	3	0	0
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact	2	1	1	1.5	1	1	0.5
Total points		50.25	12.75	13.25	9	28.50	14	23.15

For producing this report, the following research methods and tools were used for data collection and calculation of elements:

- Analysis of official documentation, data, and official websites
- Requests for free access to information
- Interviews with stakeholders and key informants.
- Public perception survey.

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. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

Table 12: FOI requests submitted (specifically for the OAO area)

Administration	Institution	Date of request	Date of reply to the request
ALB	Ministry of Health and Social Welfare	9.4.2026	24.4.2026
	Ministry of Justice	9.4.2026	10.4.2026
	Ministry of Finances	9.4.2026	21.4.2026
	National Business Centre	9.4.2026	10.4.2026
BiH	No FOI requests were submitted		
KS	Ministry of Internal Affairs	29.4.2026	29.4.2026
	Ministry of Education and Science	29.4.2026	4.5.2026
	Ministry of Culture and Tourism	29.4.2026	29.4.2026
	Office of the Prime Minister	29.4.2026	<i>Delayed response</i> ²⁵
	Kosovo Tax Administration	29.4.2026	29.4.2026
MKD	No FOI requests were submitted		
MNE	No FOI requests were submitted		
SRB	No FOI requests were submitted		

Table 13: Total FOI requests submitted overall (used as sample for sub-indicator 1)

ALB	BiH	KS	MKD	MNE	SRB	WB total
27	6	42	28	28	58	189

Interviews with key informants were conducted and used as a base for point allocation for elements 1.15, 1.16, and 2.14. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.15, 1.16, and 2.14 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

²⁵ The OPM has replied to the research team's FOI request on 4 June 2026, after the statutory deadlines and after the assessment was finished.

Table 14: Interviews with non-state actors

Administration	Date	Number of interviews
ALB	13.5.2026., 14.5.2026. (x2), 15.5.2026.	4
BIH	6.5.2026., 7.5.2026., 8.5.2026.	4
KS	29.4.2026. (x2), 4.5.2026.	3
MKD	8.4.2026. (x2), 15.4.2026.	3
MNE	11.5.2026., 12.5.2026., 25.5.2026.	3
SRB	15.5.2026., 20.5.2026.	2

Table 15: Overview of sampled institutions for the analysis under sub-indicator 2

Administration	Sampled Institutions
ALB	Ministry of Health and Social Welfare
	Ministry of Justice
	State Minister for Public Administration and Anticorruption
	Ministry of Finances
	National Business Centre
BIH	Ministry of Justice
	Ministry of Civil Affairs
	Ministry of Foreign Trade and Economic Relations of Bosnia and Herzegovina
	Ministry of Human Rights and Refugees
	Agency for Identification Documents, Registers and Data Exchange of Bosnia and Herzegovina (IDDEA)
KS	Ministry of Internal Affairs
	Ministry of Education and Science
	Ministry of Culture and Tourism
	Office of Prime Minister
	Tax Administration of Kosovo
MKD	Ministry of Environment and Physical Planning
	Ministry of Justice
	Ministry of Digital Transformation
	Ministry of Public Administration
	Agency for Real Estate Cadastre

MNE	Ministry of Finance
	Ministry of Culture and Media
	Ministry of Diaspora Affairs
	Ministry of European Affairs
	Tax Administration
SRB	Ministry of Agriculture, Forestry and Water Management
	Ministry of Education
	Ministry of Sport
	Ministry of Public Administration and Local Self-Government
	Republic Geodetic Authority

List of interview questions

➤ Element 1.15

The following questions are used for point allocation for element 1.15. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 1.5 points are allocated.

1. To what extent do you agree with the following statement: **Supervisory authority's sanctions are transparent.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Supervisory authority's sanctions are effective.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Have you ever submitted a complaint to the supervisory authority?
What was the outcome?

2. Is information about imposed sanctions easy to find and understand?
3. Do sanctions lead to improved compliance by public authorities, and does the possibility of sanctions influence how authorities respond to FOI requests?
4. What are the main obstacles limiting the supervisory authority's effectiveness, if any (resources, political support, legal framework, etc.)?

➤ **Element 1.16**

The following questions are used for point allocation for element 1.16. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 1.5 points are allocated.

1. To what extent do you agree with the following statement: **Public authorities adequately respond to requests containing sensitive information.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree
2. To what extent do you agree with the following statement: **Public authorities properly act when refusing access to information.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. When it comes to exemptions when responding to FOI requests, are they typically justified clearly and specifically, or in a generic manner?
2. Do you consider that public authorities, or a certain body, extensively rely on confidentiality or other bases for exemption from providing information?
3. How effective is the appeal process in overturning unjustified refusals, and does the possibility of appeal influence the initial practice of individual bodies, in terms of deciding if and how they will respond to an FOI request?

4. How do authorities balance the protection of sensitive information with the public interest? Is there a standardised approach to classifying information as confidential or otherwise sensitive?
5. Are certain categories of information routinely treated as sensitive, even when disclosure might be justified?
6. Do authorities frequently provide partial access through redaction, or do they tend to refuse access in full?

➤ **Element 2.14**

The following questions are used for point allocation for element 2.14. Point allocation is determined based on fully agree/tend to agree responses. If all key informants fully agree/tend to agree with the statement, 3 points are allocated.

1. To what extent do you agree with the following statement: **Public information that is proactively published online, on websites of public authorities, is citizen friendly.**
 - a) fully disagree
 - b) tend to disagree
 - c) tend to agree
 - d) fully agree

Additional guiding questions (not used for point allocation, but relevant for providing qualitative insight necessary for the assessment):

1. Is proactively published information generally sufficient for your needs, or do you often need to request additional information?
2. Are there specific institutions that stand out as particularly transparent or non-transparent, and why do you think that is the case?
3. How easy is it to navigate institutional websites? Are there some technical barriers, such as broken links, poor website structure, lack of search functionality and others?
4. Have you encountered a situation where you know that a certain document produced by the institution exists, but you cannot find it online?
5. What types of information are most often missing or difficult to access? For example, it could be information about the services that the institutions offer, public policy documents and laws under the institutions' purview, annual work reports, open data, and such.
6. How would you assess the practice of information update? Are they updated regularly and provided timely or are there issues in this regard?

The public perception survey was conducted based on a questionnaire targeting the general public (18+ permanent residents) of WB countries. The survey was conducted through computer-assisted telephone interviewing (CATI) in combination with computer-assisted web interviewing (CAWI).

The survey was conducted between the 1st and 26th of February 2025. The margin of error for the sample of 6077 citizens is $\pm 3,51\%$, at the 95% confidence level.

Table 16: Public perception survey questions in the area of Organisation, Accountability and Oversight

Statement	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
I have the right to request and obtain information of public importance from public authorities.	1	2	3	4	99
Statement	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
I can easily find the information I need on the websites of public authorities and the Government.	1	2	3	4	99
Statement	Strongly disagree	Disagree	Agree	Strongly agree	Don't know/ No opinion
The [FOI supervisory authority] assists citizens in exercising their right to obtain information of public importance.	1	2	3	4	99

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