WeBER III

WESTERN BALKAN ENABLERS FOR REFORMING PUBLIC ADMINISTRATIONS

PAR Monitor Report Serbia

STRATEGY FOR PUBLIC ADMINISTRATION REFORM

2024/2025

EUROPEAN POLICY CENTRE

CONTENTS

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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:

By partnering with the Centre for Public Administration Research (KDZ) from Vienna, WeBER 3.0 has ensured EU-level expert support, especially for developing citizen-centred methodology for solving PAR issues at local level.

ACKNOWLEDGEMENTS

The Strategy for PAR Serbia 2024/2025 report is a product of a month-and-a-half-long monitoring process, which relied on different data collection techniques and thus resulted in an abundance of findings.

As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to members of the WeBER Platform and the National Working Group in Serbia, and other stakeholders in Serbia that shared their experiences through interviews, who immensely contributed to the content of this report and its quality, and who will not be identified due to the respect of the principle of anonymity.

Lastly, the WeBER3.0 team would also like to thank its main partners and associates, who have supported the project in research and other activities. Most notably, these are the SIGMA (Support for Improvement in Governance and Management)[1], the ReSPA (Regional School of Public Administration), and the Ministry of Public Administration and Local Self-Government of Serbia, as a project associate.

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

EXECUTIVE SUMMARY

The assessment of transparency and inclusiveness of the PAR agenda in this report focuses on two critical issues – 1) participatory development of PAR planning documents, that includes non-state actors, and 2) involvement of CSO in the work of the governmental PAR coordination and monitoring mechanisms. For the former, the assessment briefly emphasises basic regulatory requirements for conducting consultations, continuing with the assessment of practices in involving external stakeholders and the public in the different stages of policy development for a sample of 2 PAR planning documents adopted since the PAR Monitor 2021/2022. For the latter, this report examines the extent and methods of CSOs' and other non-state actors' involvement in the PAR coordination and monitoring, both at the political and at the administrative levels, highlighting how institutionalised, and how meaningful, any such involvement is in practice. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.[2]

The results of this monitoring cycle showed moderate transparency and inclusiveness of the PAR planning documents development process and PAR monitoring and coordination structures. Regarding the former, the analysis of the legal framework governing the development of public policy documents indicated that the majority of relevant aspects providing for transparency and inclusiveness of consultations are in place. However, the regulations lack provisions on the transparency of government-led working groups for policy development, which is in practice used as a method of involving non-state actors. The lack of legal basis showed its practical implications for the two sample documents analysed in this cycle – the eGovernment Development Programme for 2023-2025 and the Action Plan for 2024-2025 for the Local Self-Government System Reform Programme for 2021-2025. Namely, meeting minutes were not available for either working group in charge of developing the document, and although CSOs were included as members, there were no open calls for participation for the eGovernment Development Programme. On the other hand, responsible institutions did provide all necessary information on the consultation process to non-state actors, which was a prerequisite for their substantial involvement. Moreover, public debates conducted during the development of both sample documents satisfied all criteria regarding transparency and inclusiveness. Similarly, key informants stated their satisfaction with the transparency and inclusiveness of the development process for both sample documents while

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[2] For 2022, only developments not captured by the PAR Monitor 2021/2022 are included.

simultaneously highlighting that the processes were transparent to members of the working groups, not necessarily to external actors.

Compared to the PAR Monitor 2021/2022, the participation of non-state actors in PAR monitoring and coordination structures remains limited, with CSOs in Serbia being members only of the administrative level structure – the IMPG. Besides the fact that CSOs are not included in the political level structure, the PAR Council, the major issue in this area remains the irregularity of the meetings of both the IMPG and the PAR Council. On a more positive note, the Online Monitoring Tool remains a good practice example in terms of providing all relevant data for the PAR process – monitoring reports and documents on the work of monitoring and coordination structures, such as decisions on their establishing and meeting minutes. Additionally, CSO members of the IMPG have shared slightly improved stances on the work of the IMPG, stating that the IMPG meetings allow meaningful CSO contributions and expressing their satisfaction with the communication from the heads of the structure. Despite this, they still do not see the IMPG as the structure where the key decisions regarding the PAR process are made.

The recommendations from this monitoring cycle are focused on improving the transparency of the consultation process, specifically issues of transparency of work of working groups and lack of open calls for membership in working groups for developing PAR planning documents. When it comes to the work of PAR monitoring and coordination structures, responsible institutions are recommended to increase the transparency of their work, enable CSO participation at the political level, increase the frequency of meetings and establish a calendar to ensure continuity and predictability in the work of PAR coordination structures.

LIST OF ABBREVIATIONS AND ACRONYMS

AP	Action Plan
CSO	Civil Society Organisation
EU	European Union
FOI	Freedom of Information
IMPG	Inter-Ministerial Project Group
LPS	Law on the Planning System
LSG	Local Self-Government
MPALSG	Ministry of Public Administration and Local Self-Government
OMT	Online Monitoring Tool
PAR	Public Administration Reform
PFM	Public Financial Management
PPD	Public Policy Document
ReSPA	Regional School of Public Administration
SIGMA	Support for Improvement in Governance and Management
SWG	Special Working Group
WeBER3.0	Western Balkan Enablers for Reforming Public Administrations
WG	Working Group

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 one of the main project results, seeking to facilitate 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*[3] were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024. This was done in order to keep 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]

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[3] Available at: https://www.sigmaweb.org/publications/principlesofpublicadministration.htm

[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

STRUCUTRE

- Introduction of single indicator per PAR area, divided into sub-indicators, further consisting of several sub-indicator elements (specific criteria assessed)
- Introduction of types of indicator elements, meaning that each element has a specific focus on one of the following aspects of reform:

  1) Strategy and Policy

  2) Legislation

  3) Institutional Set-up

  4) Practice in Implementation, and

  5) Outcomes and Impact

- Introduction of a 100-point scale, allowing 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 monitored processes. These interviews serve as a data source for the "Outcomes and impact" elements instead of the formerly implemented survey of civil society organisations.
- Use of public perception survey results as a data source for "Outcomes and impact" elements, and expanding its scope to complement the assessment in five PAR areas (all except for "Strategy for PAR").
- Removal of 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).

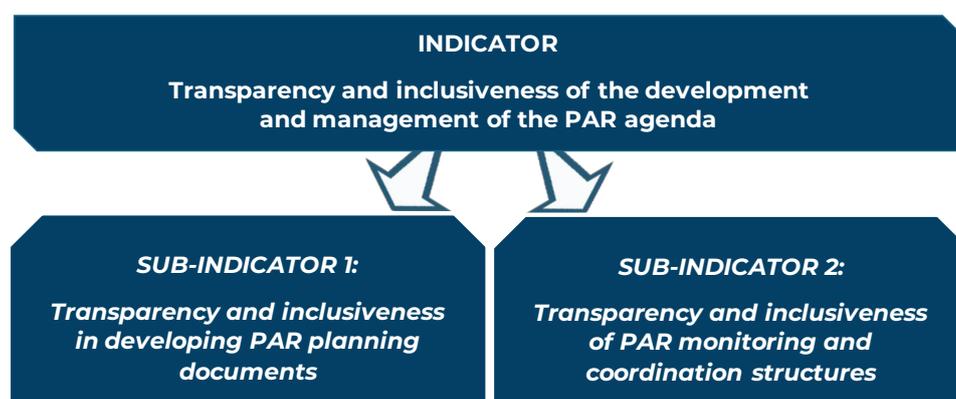## I.2   Why and how WeBER monitors the "Strategy for PAR" area

WeBER's focus on PAR policy development and coordination is crucial for several reasons. A well-developed strategic framework for PAR – clear framework of PAR planning documents that define goals, measures, activities, and funding – provides for a clear roadmap for reforming the way public institutions interact with citizens. In order to keep reform process on track and ensure meaningful progress, external monitoring of government commitments to transparency and inclusiveness in this area is essential. This is where the role of non-state actors comes to the fore, by applying external pressure on governments to meet their commitments and regularly report on progress. Moreover, allowing non-state actors to participate in both the development and monitoring of PAR planning documents' implementation strengthens the principles of transparency and inclusiveness - core tenets of good governance. Without these principles, no policy, including PAR as an overarching reform, can be effectively implemented for the society's benefits. Ensuring civil society and other non-state actors' engagement in processes of PAR policy development and coordination is, therefore, not only beneficial but essential for government accountability and long-term public administration improvement.

Monitoring in the **Strategy for PAR** is based on the one SIGMA Principle in this area:

Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

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

INDICATOR

Transparency and inclusiveness of the development and management of the PAR agenda

SUB-INDICATOR 1:

Transparency and inclusiveness in developing PAR planning documents

SUB-INDICATOR 2:

Transparency and inclusiveness of PAR monitoring and coordination structures

The monitoring period for the Strategy of PAR covers developments since the last PAR Monitor cycle, that lasted from January until November 2022. Thus, this report focuses primarily on 2023 and 2024, as well as the end-of-2022 developments not covered in the previous cycle. Although this report provides comparison of findings with previous PAR Monitor editions, country scores are incomparable to the previous monitoring due to methodological changes.

The first sub-indicator focuses on the existence and quality of consultation processes in the development of PAR planning documents - official strategies/strategic plans, plans/programmes, their action plans, or any other type of PAR planning document with a minimum two-year implementation period, formally approved/adopted by the government or parliament. It assesses whether transparency and inclusiveness in the development process are legally regulated, continuing with the practical aspects of administering consultations – whether non-state stakeholders were engaged early, invited openly and proactively, provided with complete information, and given publicly disclosed feedback on their contributions. Additionally, it examines whether the public had the opportunity to contribute on draft documents through public debates, and finally, assesses the perceived impact of consultations on transparency and inclusiveness from the view of consultees.

Monitoring of legislation and practice aspects is performed by combining data sources to ensure reliability of results, including qualitative analysis of strategic documents, and official data that is publicly available or obtained from PAR responsible institutions. For the assessment of the outcomes and impact, researchers conduct key informants' interviews with non-state actors who participated in consultative processes.

Indicator elements that are assessed under the first sub-indicator are listed in the Table 2.

Table 2: Indicator elements under the sub-indicator 1

Indicator element - number and title	Type
E1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation
E1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation
E1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation
E1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation
E1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation
E1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation
E1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation
E1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact

The assessment is done on a sample of PAR planning documents adopted in 2023 and 2024, along with those adopted in late 2022 after the completion of the last PAR Monitor's monitoring period. The analysis of this sub-indicator for Serbia includes:

- *eGovernment Development Programme for the period 2023-2025, and*
- *Action Plan for the period 2024-2025 for the Local Self-Government System Reform Programme for 2021-2025.*

The second sub-indicator monitors civil society participation in PAR coordination and monitoring structures at both the political and administrative levels. It focuses exclusively on bodies established for the most comprehensive PAR strategic document (e.g., PAR strategies). The assessment first examines whether the strategic PAR agenda provides for civil society participation in these structures. It then analyses the institutionalisation of this participation — specifically, the format of CSO involvement in administrative and political

PAR coordination bodies and whether selection processes are open and competitive. When it comes to practice, the sub-indicator assesses the regularity of meetings with CSO participation and the transparency of communication regarding the work of PAR coordination and monitoring bodies. Finally, it assesses whether CSOs can meaningfully contribute to these bodies' work, as an indication of outcome of participatory approach to PAR agenda coordination and monitoring.

The assessment is based on the review of official documents and designated websites related to the organisation and functioning of PAR coordination and monitoring structures. To assess outcomes and impact, researchers conduct key informant interviews with civil society representatives who are members of these bodies or have attended their sessions as invitees.

Indicator elements that are assessed under the sub-indicator 2 are listed in the Table 3.

Table 3: Indicator elements under the sub-indicator 2

Indicator element - number and title	Type
E2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy
E2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional set up
E2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional set up
E2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation
E2.6 The work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation
E2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact

II. TRANSPARENCY AND INCLUSIVENESS OF THE DEVELOPMENT AND MANAGEMENT OF THE PAR AGENDA

Transparency and inclusiveness of the development and management of the PAR agenda (score 0-100)

65.5	34.5

■ Awarded ■ Not achieved

II.1 Transparency and inclusiveness in developing PAR planning documents

Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

Sub-indicator 1: Transparency and inclusiveness in developing PAR planning documents[5]

Indicator elements	Element type	Score
E 1.1 Regulations envisage transparency and inclusiveness of PAR planning documents development process	Legislation	4/5
E 1.2 Consultations with non-state actors are conducted during the development of PAR planning documents	Practice in implementation	7.5/9
E 1.3 Invitations to non-state actors to participate in the consultations are open	Practice in implementation	2/8
E 1.4 Responsible institutions are proactive in ensuring that a wide range of external stakeholders become involved in the process	Practice in implementation	2/6
E 1.5 Responsible institutions provide complete information in preparation for consultations	Practice in implementation	9/9
E 1.6 Responsible institutions publish their feedback on the comments received in the consultation process	Practice in implementation	4/9
E 1.7 Public debates are organised during the development of PAR planning documents	Practice in implementation	10/10
E 1.8 Key informants consider that PAR planning documents development process is transparent and inclusive	Outcomes and impact	4/4
Total score for sub-indicator 1		42.5/60

Since the previous 2021/2022 monitoring cycle, two new planning documents which are part of the PAR agenda have been adopted: the eGovernment Development Programme for the period 2023-2025, and the Action Plan for the period 2024-2025 for the Local Self-Government System Reform Programme, both under the jurisdiction of the Ministry of Public Administration and Local Self-Government. These documents make up the sample used for the analysis of elements conducted within this sub-indicator. Another relevant development in this area is the mid-term review of the PAR Strategy Action Plan, conducted in 2023. As stated in the European Commission report on Serbia for 2024, the review confirmed uneven progress in the different reform areas, with the most effective area being service delivery.[6]

[5] Through the first sub-indicator, the following SIGMA sub-principle is monitored: All relevant stakeholders are regularly consulted and involved in PAR planning and monitoring; PAR is effectively communicated, and values of good public administration are promoted.

[6] European Commission, Serbia Report 2024, page 25. Available at: https://tinyurl.com/355bn37j

The relevant legal framework in Serbia mandates the majority of requirements which provide for transparency and inclusiveness of the PAR planning documents development process. Primarily, the Law on the Planning System (LPS) obliges institutions in charge of developing public policy documents (PPDs) to enable the participation of all interested parties and target groups in the consultation process.[7] Furthermore, the institutions are required to organise public debates before finalising the draft document and submitting it for adoption.[8] The LPS also governs the transparency of consultation and public debate reports, requiring that they be published on the website of the institution responsible for developing the PPD. These reports must include comments and suggestions from stakeholders, along with feedback from the institution on how these inputs were addressed. Moreover, the LPS provides a basis for the inclusion of non-state actors in working groups (WGs), which are established whenever a public administration body develops a PPD. Additionally, the Guidelines for Including CSOs in Working Groups for Developing Draft Public Policy Documents and Draft Regulations[9] contain specific provisions for ensuring transparency in the selection process and criteria for WG membership.

However, neither the LPS nor the Guidelines explicitly regulate the transparency of the outcomes of WG activities. This lack of regulation showed practical implications for the two sample PPDs analysed, where no publicly available meeting minutes or WG reports could be found, highlighting the need to improve the legal framework in this area. In terms of the analysis of consultation processes for the two sample documents, it should be noted that, although the analysis was conducted based on the information on the WG proceedings, working groups are not a method of consultation. Working groups are established each time a public administration body prepares a draft public PPD. They are in charge of the PPD development and should include target groups, including CSOs, expert organisations, business organisations, etc. However, this is not a substitution for consultations with target groups and interested parties, which can be conducted using a number of different techniques.[10] Nevertheless, in line with the monitoring methodology, WGs were taken into consideration during this assessment, and in both cases analysed in this report, responsible bodies involved non-state actors.

Despite the lack of public information on the WG proceedings, the minimal standards of transparency and inclusiveness of the consultations in the early

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[7] Law on the Planning System, Article 34. Available at: https://tinyurl.com/346rkfd6

[8] Law on the Planning System, Article 36.

[9] Available at: https://tinyurl.com/37tr2wre

[10] Some of the most often used techniques are focus groups, polls, round tables, semi-structured interviews, panels and calls for submission of written inputs. Article 41, Regulation on the methodology for public policy management, public policy and regulatory impact assessment and the content of individual public policy documents, available at: https://tinyurl.com/ya4z7mfc

phase of the development of the documents were mainly met – sufficient time for preparation for the members of the WG, open call for participation of non-state actors and organisation of meetings with stakeholders. The only noted exception was the lack of an open call for membership of non-state actors in the WG for the development of the eGovernment Programme. Although the analysis confirmed that non-state actors were involved, the findings suggest inconsistencies in terms of engagement procedures, which, in turn, negatively impact the transparency of stakeholder involvement.

The consultations for the eGovernment Development Programme for 2023-2025 began in June 2022 and lasted until December 2022. During this period, the Working Group for ex-post analysis, impact evaluation and amendments to the eGovernment Development Programme had four meetings in June organised by the Ministry of Public Administration and Local Self-Government (MPALSG).[11] The MPALSG provided timely announcements to WG members, which included non-state actors, and each meeting focused on a specific objective of the Programme. In addition to these four meetings, two prior meetings—held in December 2021 and May 2022— were also timely announced and held with the participation of non-state actors. Similarly, these criteria were met in the case of consultations for the Action Plan (AP) for 2024-2025 for the Local Self-Government System Reform Programme for 2021-2025, which lasted from August 2023 until February 2024. Three meetings of the WG were held in this period, out of which two were attended by non-state actors – in August and September 2023. Members of the WG had sufficient time for preparation since the MPALSG provided the meeting schedule during the first WG meeting and announced that they would gather comments on the draft AP in December. [12]

The use of multiple channels to inform stakeholders about the consultation process is another key requirement affecting the transparency and inclusiveness of the development of PAR planning documents. In the case of the AP for the LSG System Reform Programme, the open call for participation of non-state actors was published on two different channels of communication in 2019 when the Programme was developed. The call was published on the MPALSG website and the website of the now abolished Office for Cooperation with civil society.[13] Initially, it was devoted to the membership in the Special Working Group (SWG) for the development of the PAR Strategy for 2021-2030. However, this SWG also encompassed sub-groups for each specific objective of the Strategy, including the sub-group for specific objective 7: Local Self-Government System Reform,

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[11] eGovernment Development Programme for 2023-2025, pp. 75.
Available at: https://tinyurl.com/5czkpusc

[12] The assessment was conducted based on the meeting minutes of the WG meetings which were provided by the MPALSG as a response to an FOI request, received on November 1st, 2024.

[13] Available at: https://tinyurl.com/mweeyrkd

established in October 2019.[14] Since the Programme covers the period from 2021 to 2025, and the sample AP only covers the period from 2024 to 2025, the call published in 2019 was used as a basis for the assessment in this cycle.[15] On the other hand, there were no open calls for the involvement of non-state actors in the development of the eGovernment Development Programme, indicating a need for stronger enforcement of requirements for notification of the public, in order to broaden stakeholder engagement opportunities.

The responsible institution included two different stakeholder groups in the development of both analysed documents.[16] In the case of the eGovernment Development Programme, the MPALSG invited a business association (National Alliance for Local Economic Development – NALED) and a development and expert organisation (United Nations Development Programme – UNDP). Similarly, for the AP for the Local Self-Government (LSG) System Reform Programme, the MPALSG included a business association (NALED) and representatives from the academic community, including five law professors from different faculties across Serbia. No other stakeholder group was involved in either process.[17]

During the consultation process for both sample documents, the MPALSG provided complete information to the WG members. In the case of the eGovernment Development Programme, all necessary working documents were timely provided, and the WG members were fully informed about the four planned meetings, with specific dates and topics outlined. This also applied to the two prior meetings held in the early phase of conducting the ex-post analysis. Communication, along with the provision of documents and relevant information, was conducted via email. WG members submitted their comments during the meetings but were also invited to provide feedback via email, with clear instructions on the submission channel and deadlines.

Similarly, all criteria for the provision of complete information were met during the consultations for the AP for the LSG System Reform Programme. The WG members had access to a guiding document since the Programme extends until 2025, while key achievements from the previous AP for 2021-2023 were presented during the first meeting. Regarding the consultation timeline, during the first meeting, MPALSG representatives provided details about the

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[14] More information on available in the National PAR Monitor Serbia for 2021/2022, available at: https://www.par-monitor.org/serbia-par-monitor-2021-2022/

[15] The LSG System Reform Programme is hierarchically subordinated to the PAR Strategy, so the participation of non-state actors in the SWG for the PAR Strategy was deemed as early consultations for the LSG System Reform Programme. Moreover, the AP analysed here does not represent an entirely new planning document and it is developed within the framework of the Programme. Thus, the open call for inclusion of CSOs in the SWG in 2019 was sufficient for assessment in this cycle.

[16] The assessment was conducted based on the decisions on establishing the WGs and an interview organised with the representatives of the MPALSG on November 1st, 2024.

[17] Including trade unions, organisations focusing on gender equality and/or women's rights and organisations dealing with the rights of persons with disabilities.

second WG meeting, which took place in September 2023, and announced that feedback on the draft AP would be collected in December 2023. However, while information on channels for submitting contributions was not mentioned in the meeting minutes, WG members were able to provide their comments directly during the sessions.[18] These findings suggest that the development process for both sample documents was transparent from the perspective of WG members, as all relevant information was provided in a timely manner.

On the other hand, feedback on the comments received during the consultation processes for both sample documents was neither published online nor included in the meeting minutes of the WG meetings. For the eGovernment Development Programme, comments made by members of the WG were visible, with senders clearly indicated, but the available documentation did not contain statements on how comments are resolved and justifications for each response.[19] The same issue was observed in the case of the AP for the LSG System Reform Programme. The meeting minutes contained only the comments but lacked feedback and justifications. These findings showcase that the development process for both sample documents cannot be considered transparent from the point of view of external actors who did not participate in the process directly. This was also implied during interviews with non-state actors, during which participants highlighted that the processes were transparent for working group members, but not necessarily to other interested parties.[20]

On a more positive note, the public was involved in the development of both sample documents via public debates. The public debates represent an important mechanism for involving the wider public and including them in the decision-making process. All criteria for transparency and inclusiveness were met for both documents, namely:

1. calls for participation in the public debate were published through the MPALSG website (which was the institution in charge of developing both documents) and the eConsultations Portal,[21]

2. draft AP for the LSG System Reform Programme and draft eGovernment Development Programme were published with the call on the website and the Portal,

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[18] The analysis for the AP for the LSG System Reform Programme was conducted on the basis of meeting minutes of the WG, obtained through an FOI request sent to the MPALSG.

[19] The assessment for the eGovernment Development Programme relied on the meeting minutes from the meetings held in December 2021 and May 2022, as the minutes for the four meetings held in June 2022 were unavailable.

[20] Key informant interviews were held on November 14th, November 21st and November 29th, 2024.

[21] For the eGovernment Development Programme, available at: https://tinyurl.com/5e9zhvvk and https://tinyurl.com/hfmde7st. For the AP for the LSG System Reform Programme, available at: https://tinyurl.com/5fk9ytef and https://tinyurl.com/2ttxd9v2

3. information on channels for submitting comments and inputs and contact information were published for both documents on the Portal and the MPALSG website,

4. both public debates lasted 19 days,

5. MPALSG published reports on the public debates for each document on its website and the Portal – no comments were submitted for the eGovernment Development, but the report for the AP for the LSG System Reform Programme contains comments from the interested public, feedback on how the comments were treated, and explanations.

Finally, interviewed non-state actors – who participated in the development of the two sample documents - generally agreed that the development process for the sample documents was both transparent and inclusive.[22] Regarding the eGovernment Programme, key informants expressed satisfaction with the transparency and inclusiveness of the process. However, one key informant noted that this transparency and inclusiveness applied primarily to participants within the WG and not necessarily to external observers. Similarly, the key informant for the AP for the LSG System Reform Programme emphasised that WG members were able to provide input throughout the process and that timelines, agendas, and results were transparent to them. While this informant expressed satisfaction with the process, he also highlighted uncertainty about whether it was equally transparent to those outside the WG. In conclusion, these insights confirm that the lack of a legal framework regulating the transparency of the work of WGs leads to significant shortcomings in practice. This is supported by the fact that the assessment for the consultation process, apart from the public debates, was conducted using information obtained through FOI requests and interviews, since only the basic information, such as the duration of the consultation process, was publicly available.[23]
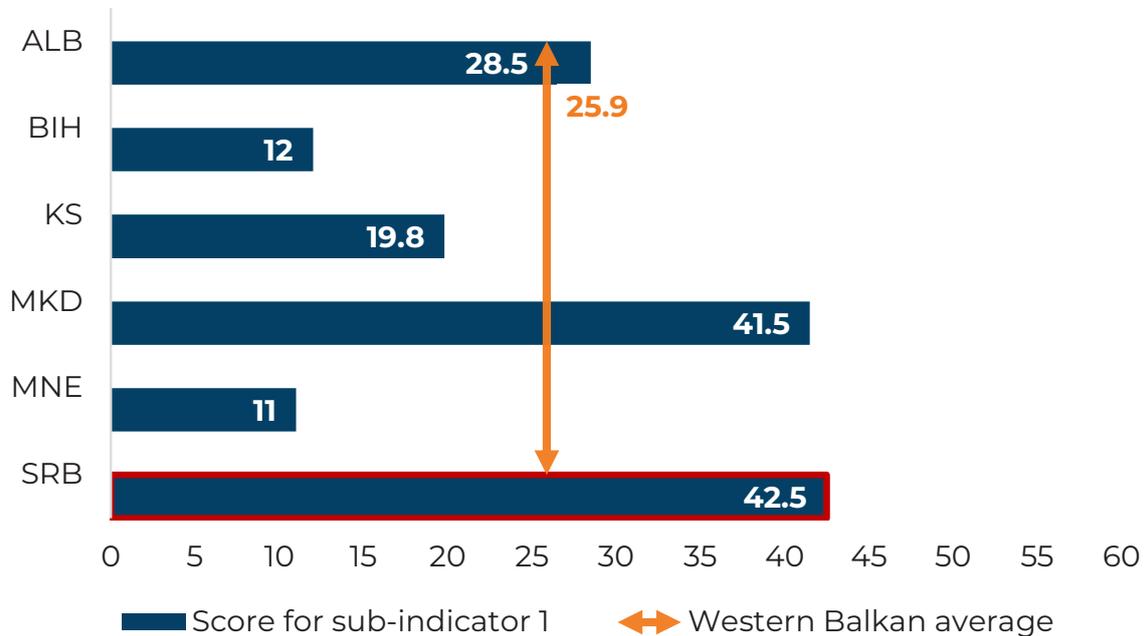
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[22] Key informants which participated in the interviews were selected from among those who have participated in the process of developing PAR planning documents which make up the PAR agenda, i.e., the analysed sample. A minimum of one key informant per PAR planning document was selected. All three key informants chose the option "tend to agree" to the statement *The development process of the PAR planning document was transparent*. Two key informants choosing "tend to agree" option, and one chose "fully agee" to the statement *The development process of the PAR planning document was inclusive*. Key informant interviews were held on November 14th, November 21st and November 29th, 2024.

[23] Interviews with representatives of the MPALSG, which were in charge of the eGovernment Development Programme, were organised on 1.11.2024. FOI requests were submitted to the MPALSG on 22nd October and 14th November 2024, while the responses were received on the 1st and 28th November 2024, respectively.

How does Serbia do in regional terms?

Sub-indicator 1:
Transparency and inclusiveness in developing PAR planning documents

Chart showing Score for sub-indicator 1 by country:
- ALB: 28.5
- BIH: 12
- KS: 19.8
- MKD: 41.5
- MNE: 11
- SRB: 42.5

Western Balkan average: 25.9

Legend: Score for sub-indicator 1 — Western Balkan average

II.2 Transparency and inclusiveness of PAR monitoring and coordination structures

Principle 1: A comprehensive, credible and sustainable public administration reform agenda is established and successfully implemented, fostering innovation and continuous improvement.

Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures[24]

Indicator elements	Element type	Score
E 2.1 Participation of civil society in monitoring and coordination structures is envisaged in the PAR agenda	Strategy and policy	2/2
E 2.2 Format of CSO involvement in administrative structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	3/3
E 2.3 Format of CSO involvement in political structures for PAR coordination and monitoring enables their regular and substantive participation	Institutional setup	2/3
E 2.4 Involvement of CSOs is achieved based on an open competitive process	Institutional setup	2/4
E 2.5 Meetings of the PAR coordination and monitoring structures are held regularly with CSO involvement	Practice in implementation	0/10
E 2.6 Work of PAR monitoring and coordination structures is communicated transparently	Practice in implementation	10/10
E 2.7 Key informants consider that they can meaningfully contribute during the meetings of monitoring and coordination structures	Outcomes and impact	4/8
Total score for sub-indicator 2		23/40

CSOs in Serbia remain included only in the administrative-level structures for PAR monitoring and coordination. During the previous two years, the PAR Council held two meetings - in January 2023 and December 2025. The Inter-Ministerial Project Group held three—one in August 2023, then in November and December 2024. The European Commission noted that PAR coordination mechanisms at political and administrative levels are formally in place, but their use in practice and their impact are limited. Additionally, it was noted that the PAR online monitoring tool is not regularly updated and does not provide an accurate and up-to-date picture of implementation overall or by policy pillar.[25]

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[24] Through the second sub-indicator, the following SIGMA sub-principle is monitored: PAR is coordinated at political and administrative levels; sufficient resources are allocated, and the planned reforms are effectively implemented and monitored.

[25] European Commission, Serbia Report 2024, page 25.

Since the previous PAR Monitor 2021/2022, the method and extent of CSO involvement in PAR monitoring and coordination structures remained the same. CSOs are still included only in the administrative-level structure, i.e., in the Inter-Ministerial Project Group (IMPG). The PAR Strategy states that members of the IMPG are, among others, representatives of civil society rganisations.[26] The latest Decision on establishing the IMPG, adopted in September 2024, lists all those organisations' representatives as members, as did the previous decisions.[27] On the other hand, CSOs are not members of the PAR Council, the political-level structure. The three decisions on establishing the PAR Council adopted to this date do not include CSOs as members, only representatives of state institutions, and a representative of the Standing Conference of Towns and Municipalities.[28]

Although not official members of the Council, CSOs are subject to invitation to participate in the Council meetings. Specifically, the PAR Strategy states that the Council may invite representatives of citizens' associations elected to the IMPG to participate in the PAR Council session once a year to obtain information on CSOs' perceptions of PAR.[29] Additionally, the Rules of Procedure of the PAR Council state that the president can invite CSOs to attend a thematic session of the Council in order for them to provide a more comprehensive overview of the issues on the agenda.[30] This possibility is stated only in the case of thematic meetings, not regular sessions. However, these options have not been utilised so far, reflecting a missed opportunity to strengthen transparency and foster dialogue with civil society at the political level.

On the other hand, CSOs became full-fledged members of the IMPG following an open call published in 2019 by the MPALSG and the now-abolished Office for Cooperation with Civil Society.[31] The call had no major restrictions for application but was primarily intended for the membership of CSOs in the SWG for Developing the Draft PAR Strategy for the period after 2021.[32] All CSOs who became members of the SWG after this call were invited to express their interest in becoming members of the IMPG, with the idea for the same CSOs who

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[26] The Strategy for PAR in the Republic of Serbia for the period 2021-2030, pp.249. Available at: https://tinyurl.com/r9a7dfkh

[27] All Decisions on establishing the IMPG list the organisations as members, available at: https://tinyurl.com/3eu7v2yc

[28] The latest Decision on establishing the PAR Council was adopted in July 2024. All decisions are available at: https://tinyurl.com/34mk4f3r

[29] PAR Strategy, pp. 252.

[30] Rules of procedure of the PAR Council, available at: https://tinyurl.com/34mk4f3r

[31] Available at: https://tinyurl.com/yj52jutz

[32] The call was intended for CSOs operating in areas such as PAR, rule of law, anticorruption, democratisation, transparency, open data, etc. Apart from this and a few other basic criteria (e.g., a CSO is registered at least one year before the publication of the call, project experience and expertise, etc.), there were no major restrictions for applying.

participated in the development of the PAR Strategy to be involved in monitoring and coordinating its implementation.[33] This approach showcased the Ministry's efforts to streamline the processes of inviting and selecting non-state actors to participate in these two separate but mutually connected groups.

Table 4: CSOs members of the IMPG

Belgrade Open School
Centre for Policy Research ARGUMENT
Civic Initiatives
European Policy Centre
Local Democracy Agency
National Coalition for Decentralisation

Although CSOs are formal members of the IMPG, their potential to contribute to its work is undermined due to the irregularity of the meetings. Since its establishment in September 2021, the IMPG has held seven meetings, out of which six were taken into account for the assessment.[34] The first took place in October 2021, while the second was organised in May 2022. The third and fourth meetings were held only four days apart in December 2022. The fifth meeting was held in August 2023, with the sixth one being organised more than a year later (see table four below). Additionally, the seventh meeting was organised in December, 2024, however, no information is available on the Online Monitoring Tool (OMT), only on the MPALSG website.[35] Besides the fact that CSOs are not members of the PAR Council, the meetings of this structure also cannot be deemed regular. After being established in 2021, the Council held its first two meetings in June and December 2021 and did not convene again until January 2023. The fourth, most recent meeting was held nearly two years later (see table five).[36] These findings indicate a lack of continuity in organising meetings, which raises concerns regarding the effectiveness of the PAR coordination structures. The irregularity of political and administrative-level

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[33] This was confirmed in the previous monitoring cycles when researchers obtained the email which was sent to the members of the WG on June 11th, 2021, with a deadline until June 18th for CSOs to express their interest.

[34] The latest meeting was not taken into consideration since it was organised after the monitoring period, i.e., after December 1st.

[35] Additionally, the MPALSG provided information on two e-sessions of the IMPG organised in this period - one in December 2023 and one in February 2024. However, these sessions were not taken into account for point allocation since there are no information on them available on the OMT. Information on the seventh IMPG meeting available at: https://tinyurl.com/36f2bzpm

[36] Information on the fourth meeting are available only on the MPALSG website, not the Online Monitoring Tool (OMT): https://tinyurl.com/28p7acar

meetings suggests no established practice of holding sessions at predictable intervals, essential for ensuring proper monitoring and coordination.

Table 5: timeline of PAR Council's and IMPG's activities since their establishment in 2021

	PAR Council	IMPG
Established	*Decision from June 3rd, 2021*	*Decision from September 1st, 2021*
Sessions	June 10th, 2021	October 8th, 2021
	December 23rd, 2021	May 24th, 2022,
		December 23rd, 2022
		December 27th, 2022
Re-established	*Decision from December 29th, 2022*[37]	*Decision from April 24th, 2023*
Sessions	January 26th, 2023	August 31st, 2023
Re-established	Decision from July 25th, 2024	Decision from September 17th, 2024
Sessions	December 12th, 2024	November 5th, 2024
		December 17th, 2024

On a more positive note, the communication of work of the PAR monitoring and coordination structures was assessed as transparent. Based on the information available on the OMT, a designated website where all relevant information on the PAR agenda is provided, there are up-to-date sections with all relevant PAR planning documents and their monitoring reports, with certain exceptions.[38] For instance, the reports for the PFM Reform Programme and the Programme for Improvement of Public Policy Management and Regulatory Reform for 2023, documents subordinate to the overall PAR Strategy, are not available on the OMT, though provided on the websites of institutions in charge of their implementation. As for the section related to the monitoring and coordination structures, the rules of procedure of the IMPG and the PAR Council, and the latest decisions from 2024 on their establishment, are available. Moreover, meeting minutes for all the meetings considered in the assessment are also available.

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[37] This decision is no longer available on the OMT, in the section containing all other information on the PAR Council, but can be found among the files from the Government session during which it was adopted, available at: https://www.srbija.gov.rs/prikaz/675076

[38] Available at: https://tinyurl.com/5czkpusc

Still, there is a lack of the timely publication of meeting minutes for both structures. Formally, meeting minutes for each meeting have to be adopted during the next time each structure convenes. The practice of adopting meeting minutes only during subsequent sessions causes significant delays in their publication, limiting access to up-to-date information. For example, the meeting minutes for the third PAR Council meeting, held in January 2023, were published in December 2024 on the occasion of the next session, nearly two years later. Addressing these delays and ensuring the timely provision of information on the OMT would strengthen the transparency of the work of PAR coordination structures.
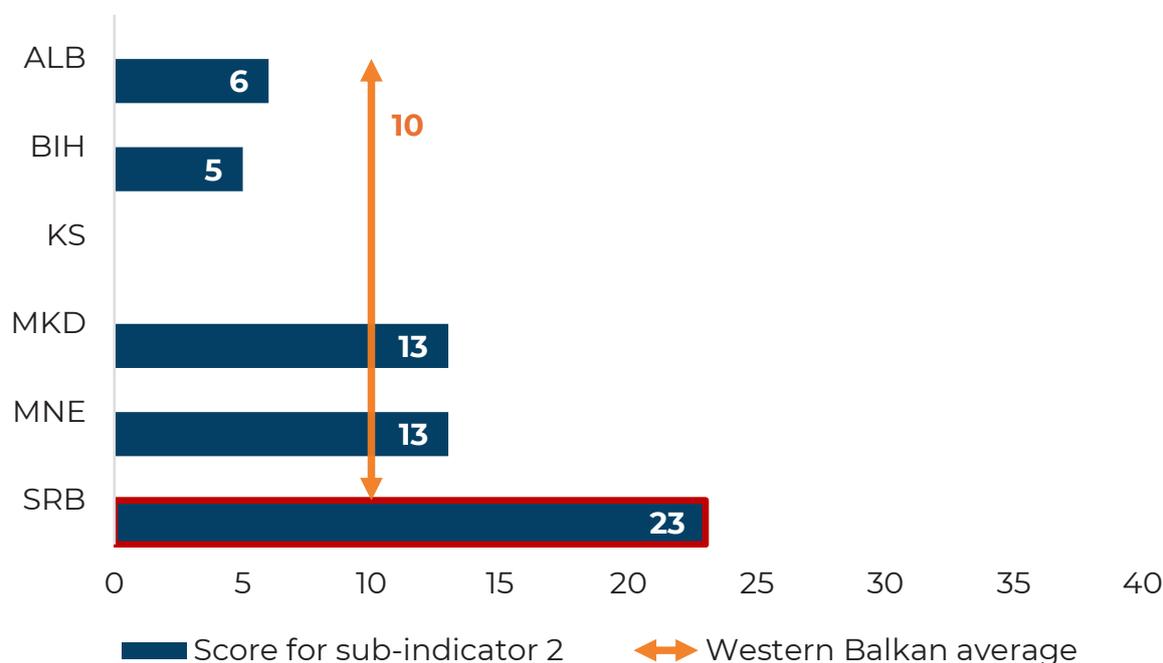
Finally, non-state actors, members of the administrative level structure, provided some positive stances regarding the work of the IMPG compared to the previous monitoring cycles. Namely, they agreed that materials for preparation for the meetings are provided timely and that the meetings allow for meaningful CSO contribution.[39] Although stating satisfaction, one interviewee pointed out that they were aware of the limited decision-making jurisdiction of the IMPG, i.e., that the PAR Council was the key decision-making body. However, the interviewee stated that the IMPG is an example of good practice when it comes to the involvement of CSOs, handling CSO inputs, providing materials, etc. Additionally, he pointed out that the feedback on their comments is often provided at the following meeting, which can cause significant delays since the meetings are not regular.

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[39] Two key informants chose the option "tend to agree", and one chose "fully agree" to the statement *Materials for preparation for meetings of administrative structures are provided timely*. All three key informants chose the "tend to agree" option to the statement *Meetings of administrative structures allow meaningful contribution*. Key informant interviews were held on 25th, 27th and 28th of November, 2024.
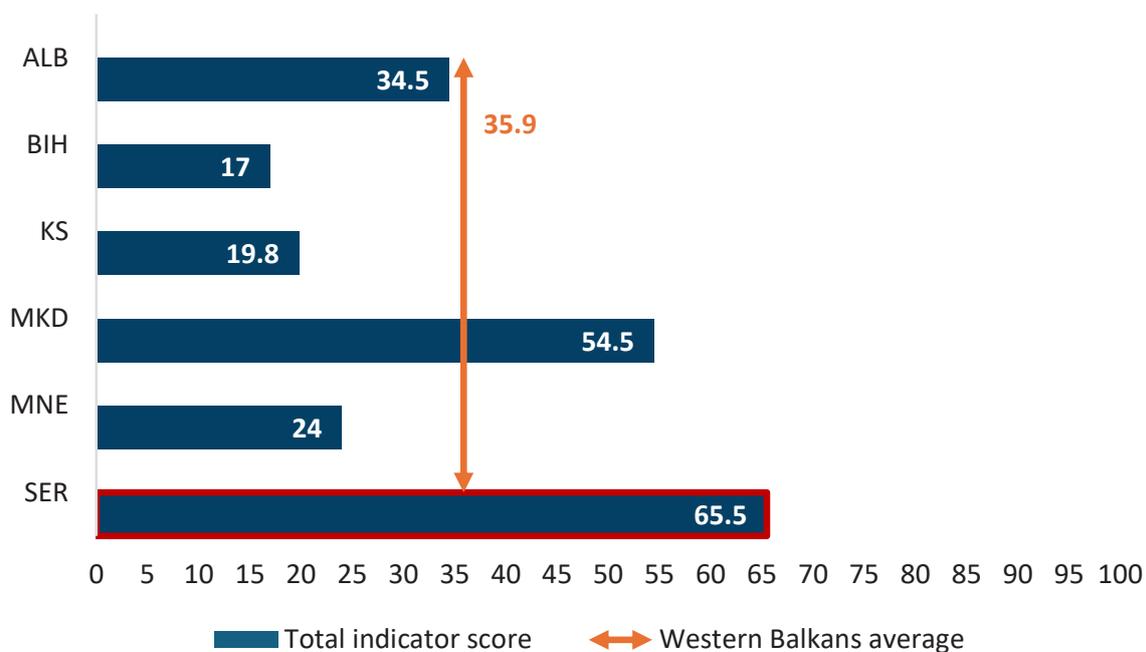
How does Serbia do in regional terms?

Sub-indicator 2: Transparency and inclusiveness of PAR monitoring and coordination structures

Legend: Score for sub-indicator 2 — Western Balkan average

Country	Score
ALB	6
BIH	5
KS	
MKD	13
MNE	13
SRB	23

Western Balkan average: 10

Overall scores comparison in the Strategy for PAR

Indicator: Transparency and inclusiveness of the development and management of the PAR agenda

Legend: Total indicator score — Western Balkans average

Country	Score
ALB	34.5
BIH	17
KS	19.8
MKD	54.5
MNE	24
SER	65.5

Western Balkans average: 35.9

Regional overview report for Strategy area, with results for all WB administrations, is available at: www.par-monitor.org

II.3 Recommendations for the Strategy for PAR

II.3.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

Recommendations	Type (short term/medium term/long term)[40]	Status	Explanation
Institutions responsible for PAR strategic framework should broadly advertise consultations with announcements posted at least on 1) one's own website, 2) the eGovernment portal, 3) website of the institution responsible for cooperation with civil society, and 4) through available social media channels	Long term	Partially implemented	Findings indicate that the main channels for informing used by the relevant institutions are the eConsultations Portal and the website of the institution in charge of developing the document. The website of the Ministry of Human and Minority Rights and Social Dialogue, responsible for cooperation with civil society, publishes mainly processes within its jurisdiction on its website. Additionally, social media channels are not used systematically to advertise consultations.[41]
Institutions responsible for PAR strategic framework need to publicly release reports on every consultation round (early, or late), clearly addressing all received inputs individually, and explaining the reasons behind acceptance or rejection.	Long term	No action taken	Findings from this monitoring cycle, based on two sample documents, indicate that feedback from non-state actors is often publicly unavailable for meetings of working groups established for the development of a public policy document.

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[40] Recommendations for which the time needed for implementation is deemed to be up to one year are labeled as short term. Medium-term recommendations are those which can be implemented in a period from one year up to three years. Long-term require more than three years to be implemented.

[41] For example, the MPALSG Instagram post on the AP for the LSG System Reform Programme does not contain any information on the consultation process, but provides only brief information on the objective of the document and refers to the MPALSG website for further information, while there were no posts for the eGovernment Development Programme, available at: https://tinyurl.com/y4h5yj5v. Relevant information on consultations for this document are available at: https://tinyurl.com/2af7x78x and https://tinyurl.com/ymy5an5z. Relevant information on consultations for the eGovernment Development Programme are available at: https://tinyurl.com/45f3suaz and https://tinyurl.com/hfmde7st.

Institutions responsible for PAR strategic framework should proactively and regularly involve a diverse group of stakeholders representing various interests relevant to the PAR policy. In particular, mechanisms of positive discrimination should be ensured to enable the participation of a wider range of actors (unions, organisations dealing with issues of gender equality and issues of importance for persons with disabilities) in the process of drafting strategic documents.	Long term	No action taken	Neither of stakeholder groups listed in the recommendation were proactively approached during the development of two sample documents. From the Decision on establishing the WG for the eGovernment Development Programme, it can be determined that business and expert associations were included. Additionally, from the Decision on establishing the WG for the AP for the LSG System Reform Programme, it can be determined that business associations and the academic community were involved. However, representatives of unions, organisations dealing with issues of gender equality and issues of importance for persons with disabilities were not included in either working group.
To ensure that CSO views are meaningfully considered at both levels of the PAR monitoring and coordination structure, MPALSG should, in the mid-term, consider the formal membership of at least one CSO in the PAR Council.	Short term	No action taken	CSOs are not members of the PAR Council. The latest Decision on establishing the PAR Council from July 2024 does not list them as members. Additionally, even though CSOs members of the IMPG are subject to invitation for participating in the Council's meetings, this options also was not utilised so far.

MPALSG should place greater focus on the concrete issues and problems deriving from the current PAR AP implementation when defining IMPG sessions' agenda, especially on the most pressing issues related to citizen-facing aspects of administration: openness, transparency, responsiveness of administration and external accountability.	Long term	No action taken	The meeting minutes of the IMPG meetings do not contain any information on discussion on these aspects.
MPALSG should ensure consistency of the IMPG calendar, with at least one session every six months and, ideally, a session every three months.	Long term	No action taken	The IMPG meetings are not held consistently. Since its establishment in 2021, seven meetings were organised: the first in October 2021, the second in May 2022, while the third and fourth meetings were held only four days apart in December 2022. The fifth meeting was held in August 2023, with the sixth one in November 2024, and the seventh meeting held on December 17th, 2024. This indicates that there is no consistency when organising the IMPG meetings, with some being held merely days apart, while some more than a year apart.
MPALSG should ensure that issues of concern for CSOs are integrated into IMPG sessions' agenda as much as possible by asking in advance CSO members of this body to candidate agenda items. In such cases, the meeting minutes should highlight which agenda items were proposed by CSOs.	Long term	No action taken	Meeting minutes of the IMPG do not contain any information on agenda items proposed by the CSOs.

Inclusion of a wider group of stakeholders representing different interests relevant to the PAR policy MPALSG can carry out as necessary, i.e., during the process of developing strategic documents, in the stage of drafting the impact assessments, outside the formal framework of membership in working groups. Modalities of involvement can be focus groups, consultative meetings, surveys and such.	Long term	No action taken	As previously stated, business and expert associations were included in the development of the eGovernment Development Programme, while business associations and academic community were involved in developing the AP for the LSG System Reform Programme. However, representatives of unions, organisations dealing with issues of gender equality and issues of importance for persons with disabilities were not included in either working group.
The Ministry of Finance should organise consultations with interested parties during the preparation of the PFM RP, both in the early stages of preparation and during the process of defining and elaborating measures and activities of the Programme. Although commendable, the long-standing practice of holding the PFM Policy Dialogue usually comes at a stage when the text of the PFM RP Proposal has already been drafted, which limits the effect and purpose of such additional consultations.	Long term	N/A	The status of this recommendation cannot be determined since the PFM Reform Programme is still in force, and thus the new one has not been adopted. However, in 2023 the Ministry of Finance prepared a revised version of the Programme which was adopted by the Government. During the preparation of the amendments, the Ministry of Finance did not organise consultations in the early stage, i.e., during the process of defining and elaborating measures and activities of the Programme. The Ministry only organised the PFM Policy Dialogue in November 2023 to present already made decisions to stakeholders and interested parties.[42]

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[42] Information on the PFM dialogue is available at: https://tinyurl.com/yc5ptvfr

Since the PAR Strategy is an umbrella reform document, the responsible authorities should ensure that the members of the umbrella working group for the development of the PAR Strategy are also invited to become members of the working groups formed for the purpose of drafting public policy documents arising from the Strategy (programmes). In this way, continuity is achieved in the development of the strategic framework. At the same time, civil society organisations that are members of the umbrella working group can thus be involved in the further development of the strategic framework in the areas in which they have interests and knowledge.	Long term	Fully implemented	The MPALSG had this approach when developing the three programmes subordinate to the PAR Strategy in 2021, and this practice was analysed in the previous monitoring cycle.[43] The Working group in charge of developing the AP for the period 2024-2025 for the LSG System Reform Programme, the only document under the PAR Strategy developed during this monitoring period, did include representatives of NALED and the Standing Conference of Towns and Municipalities, as did the working group which developed the first AP of this Programme. It is unclear if they were targeted specifically due to their previous involvement or expertise in this area. Additionally, in October 2024, representatives of the MPALSG invited members of the Special Working Group for developing the PAR Strategy for 2021-2025 to delegate members of the working groups for each thematic area of the Strategy, as part of the process of developing the AP for the period 2026-2030 for the PAR Strategy.[44]

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[43] More information available in the National PAR Monitor 2021/2022 Serbia, at: https://tinyurl.com/4d98yuh3

[44] The invitations were sent to members of the Special Working Group by representatives of the MPALSG on October 21st, 2024.

II.3.2 RECOMMENDATIONS FROM THE 2024/2025 PAR MONITOR REPORT

- Responsible institutions do not consistently publish open calls for stakeholder involvement in working groups when developing new public policy documents, whereas continuity is ensured when developing action plans for already existing documents (which was demonstrated in the case of the LSG System Reform Programme). In order to facilitate transparency in the process of involving non-state actors in the working groups, institutions in charge of planning documents development should adhere to the Guidelines for Including CSOs in Working Groups for Developing Draft Public Policy Documents and Draft Regulations, especially in terms of transparency of the selection process and the criteria for applying for membership. *(short-term recommendation)*

- Responsible institutions fail to provide comprehensive reports on the working groups proceedings, which include inputs provided by the WG members and feedback of the responsible institution. To ensure that all relevant information on the consultation process, including the stakeholders' comments and inputs and the responsible institution's feedback, are provided and published, the Public Policy Secretariat should consider amendments to the Law on Planning System that would help improve the state of play in this area and increase transparency of working group proceedings. The upcoming revision of the legal framework governing consultations and public debates can be used as an opportunity to revise this aspect. *(medium-term recommendation)*

- CSOs in Serbia remain included only in the administrative level structures of PAR monitoring and coordination. To ensure that CSOs' views are considered at both administrative and political levels of the PAR monitoring and coordination structures, the Ministry of Public Administration and Local Self-Government should consider granting at least one CSO formal membership in the PAR Council, the political level structure. The CSO member in the Council can be elected by the organisations participating in the Inter-Ministerial Project Group as their representative, possibly on a rotation-basis to enable all CSOs IMPG members to participate in the Council's meetings over time. *(short-term recommendation)*

- Meetings of the political and administrative-level structures are neither held regularly nor follow an established pattern, with some meetings occurring more than a year apart, while others are scheduled only days apart. The MPALSG should ensure consistency of IMPG and PAR Council meetings, with an established calendar to ensure continuity and predictability in the work of PAR coordination structures. Moreover, it will

enable stakeholders to prepare adequately, contribute more effectively, and track the progress of the reform. *(short-term recommendation)*

- According to the current rules of procedure, meeting minutes of the IMPG and the PAR Council are published only when officially adopted during the subsequent session for each structure. In order to avoid delays in information provision and improve the transparency of the work of these structures, the Ministry of Public Administration and Local Self-Government should publish the draft meeting minutes on the OMT, as in the case of publishing draft reports on the implementation of the PAR Strategy until the Council and the IMPG formally adopt them. Alternatively, the Ministry could provide information on the meetings as short news containing all important information. *(short-term recommendation)*

METHODOLOGY APPENDIX

For producing this report for Serbia, 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.

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 6. FOI requests sent in Serbia

Institution	Date of request	Date of reply to the request
Ministry of Public Administration and Local Self-Government	22.10.2024.	1.11.2024.
Ministry of Public Administration and Local Self-Government	14.11.2024.	28.11.2024.

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8 and 2.7. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. One such interview was organised on November 1st with representatives of the Ministry of Public Administration and Local Self-Government on the topic of consultations organised during the development of the eGovernment Development Programme for the period 2023-2025.

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 1.8 and 2.7 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.

Table 7. Interviews conducted in Serbia

Date	Interviewees	Link to elements
1.11.2024.	Representatives of the Ministry of Public Administration and Local Self-Government regarding the eGovernment Development Programme for 2023-2025	element 1.2 – element 1.6
14.11.2024.	Key informant, member of the Working group for ex-post analysis, impact evaluation and amendments to the eGovernment Development Programme	element 1.8
21.11.2024.	Key informant, member of the Working group for developing the AP for 2024-2025 for the Local-Self Government System Reform Programme for 2021-2025	element 1.8
25.11.2024.	Key informant, member of the Inter-Ministerial Project Group	element 2.7
27.11.2024.	Key informant, member of the Inter-Ministerial Project Group	element 2.7
28.11.2024.	Key informant, member of the Inter-Ministerial Project Group	element 2.7
29.11.2024.	Key informant, member of the Working group for ex-post analysis, impact evaluation and amendments to the eGovernment Development Programme	element 1.8

List of interview questions

- **Element 1.8**

1. To what extent do you agree with the following statement: **The development process of the PAR planning document was 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: **The development process of the PAR planning document was inclusive.**

    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. How are civil society organisations involved in the initial stages of developing PAR planning documents?

2. How transparent are the timelines, agendas, and outcomes of consultations during the development of the PAR planning documents?

3. How are feedback and contributions from different stakeholders documented and integrated?

4. How are key decisions made throughout the development of PAR documents, and are these decisions communicated clearly to all involved parties? (for example, decisions on adopting changes proposed by the non-state actors – specific measures, activities, and such)

5. Is there an opportunity for continuous feedback throughout the process?

6. Have there been instances where stakeholder input significantly impacted the development process of the planning process? Could you provide an example?

7. During the development of the PAR planning documents, did the responsible authorities implement different forms of consultations during the process (such as focus groups, surveys, interviews, submission of written contributions, etc.). If the answer is yes, please elaborate.

- **Element 2.7**

1. To what extent do you agree with the following statement: **Materials for preparation for meetings of administrative structures are provided timely.**

   e) fully disagree

   f) tend to disagree

   g) tend to agree

   h) fully agree

2. To what extent do you agree with the following statement: **Materials for preparation for meetings of political structures are provided timely.**

   e) fully disagree

   f) tend to disagree

   g) tend to agree

   h) fully agree

3. To what extent do you agree with the following statement: **Meetings of administrative structures allow meaningful contribution.**

   a) fully disagree

   b) tend to disagree

   c) tend to agree

   d) fully agree

4. To what extent do you agree with the following statement: **Meetings of political structures allow meaningful contribution.**

   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. Do you feel that your organisation has a meaningful voice in the decision-making processes within the administrative and political structures? Please elaborate

2. Have there been instances where your organisation's input has led to changes or influenced outcomes? Please provide an example

3. How do you receive updates or feedback on how your organisation's contributions are utilised?

4. How would you assess communication within the structures and from heads of the structures in terms of effectiveness and timeliness?

5. How would you assess the transparency of the decision-making processes within the structures?

6. Do you believe that the coordination and monitoring structures could better support engagement and utilise civil society contributions? In which way

7. How would you assess the availability of information on PAR implementation and monitoring, i.e., how would you assess the online availability of relevant information?

LIST OF REFERENCED SOURCES IN THIS REPORT

Legal acts, by-laws and public policy documents

eGovernment Development Programme for 2023-2025. *Official Gazette No. 33/2023* Available at: https://tinyurl.com/5czkpusc

Guidelines for Inclusion of Civil Society Organisations in Working Groups for the Development of Draft Public Policy Documents and Regulations of Serbia, *Official Gazette No. 8/2020*, 107/2021. Available at: https://tinyurl.com/37tr2wre

Law on the Planning System of the Republic of Serbia, Official Gazette No. 30/2018. Available at: https://tinyurl.com/346rkfd6

Strategy for PAR in the Republic of Serbia for the period 2021-2030, *Official Gazette* No. 42/2021, 9/2022. Available at: https://tinyurl.com/r9a7dfkh

Reports

Divljak, Milica, Milica Škorić, and Sava Mitrović. 2023. *National PAR Monitor 2021/2022 Serbia -* https://tinyurl.com/4d98yuh3

European Commission. 2024. S*erbia Report 2024*. Available at: https://tinyurl.com/355bn37j

Websites

eConsultations Portal - https://ekonsultacije.gov.rs/

Ministry of Public Administration and Local Self-Government (official website) - https://mduls.gov.rs/?script=lat

Online Monitoring Tool - https://monitoring.mduls.gov.rs/