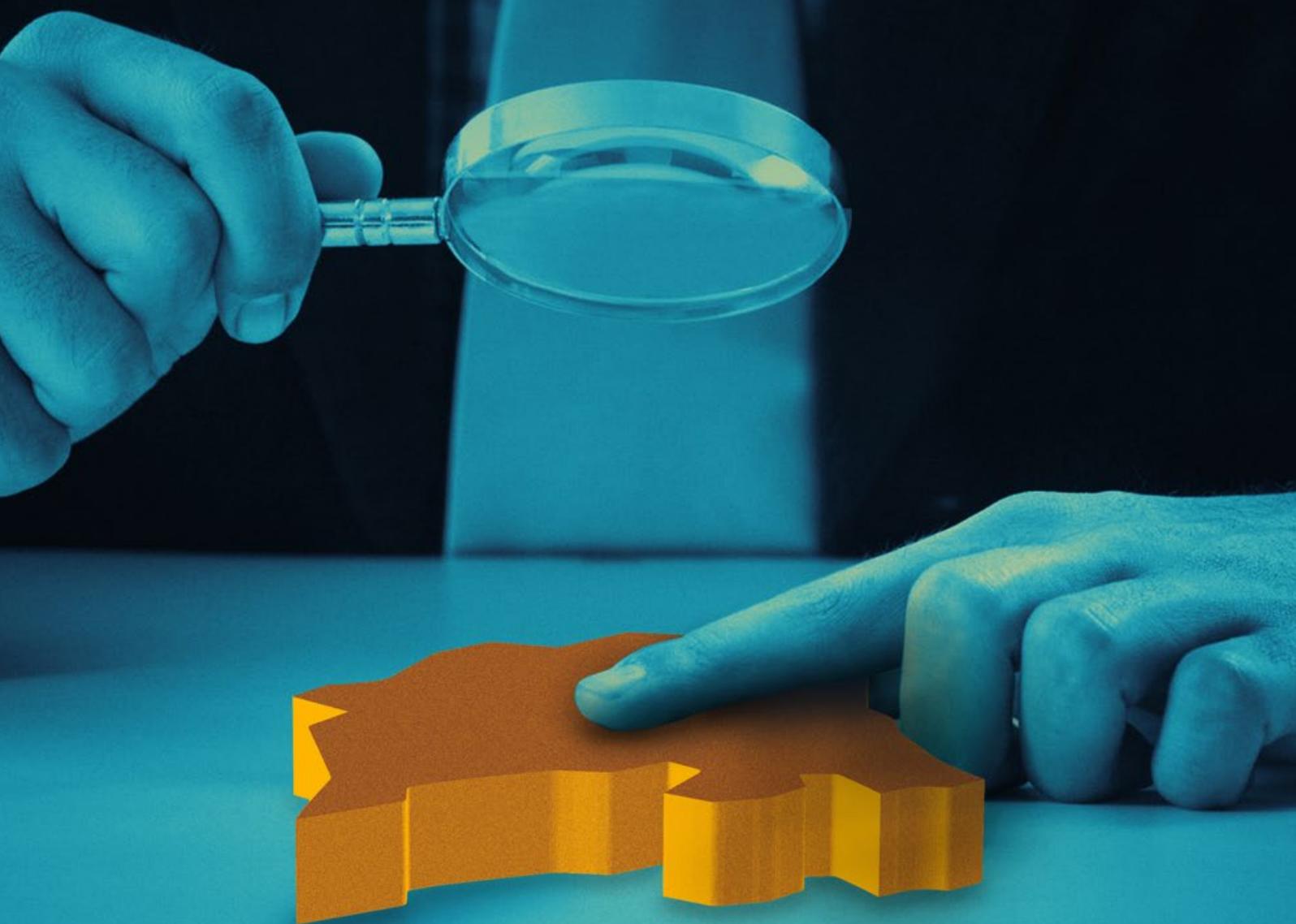
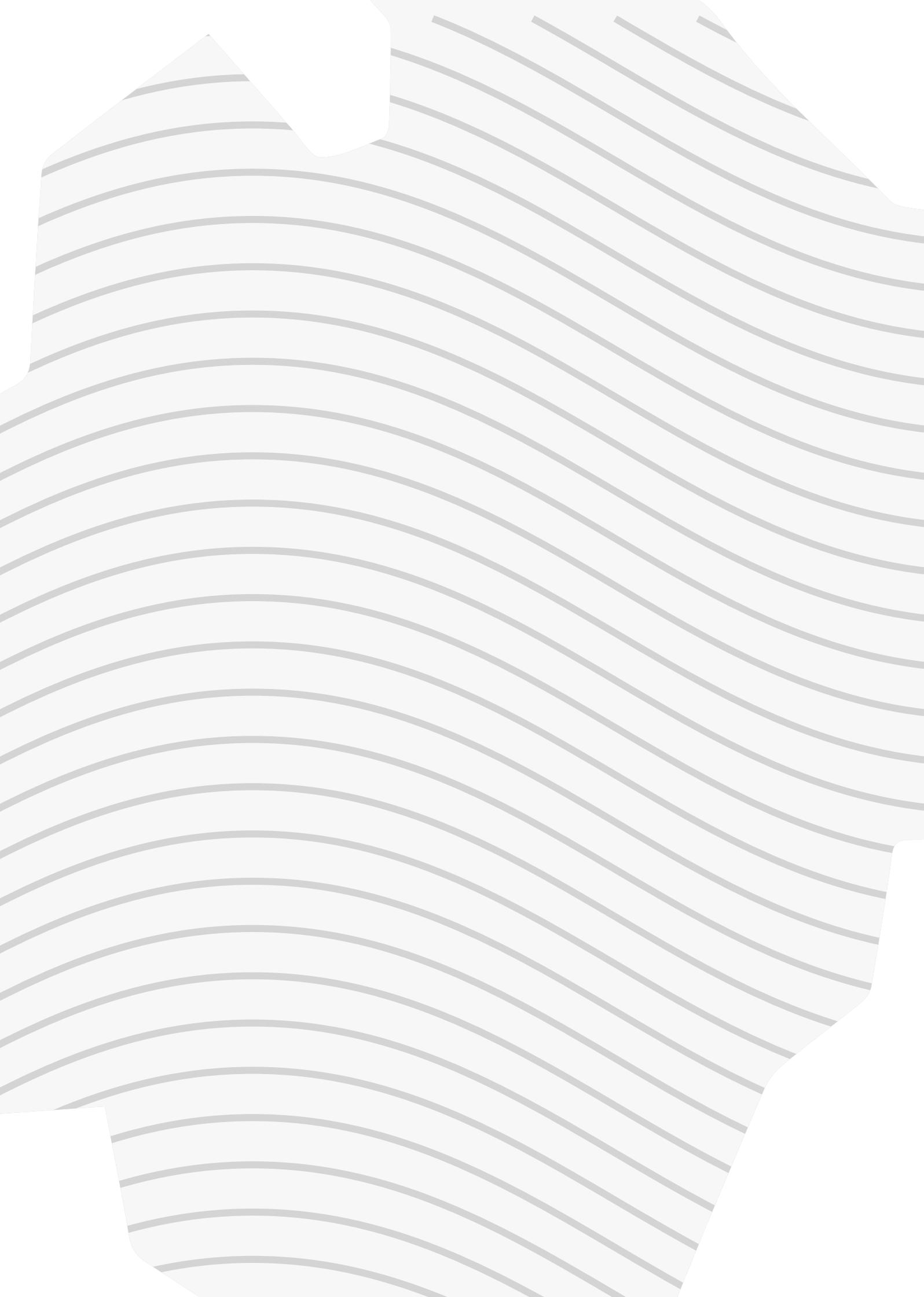


TRANSPARENCY INDEX OF MONTENEGRIN MUNICIPALITIES







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Podgorica, 2020

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VLADA CRNE GORE
MINISTARSTVO JAVNE UPRAVE

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INTRODUCTION

Fight against corruption requires a multidisciplinary, continuous and multifaceted approach, and one of the preconditions is a high degree of transparency in the work of public sector bodies. Local self-governments are the closest service to the citizens which is expected to respond directly to their needs. However, openness is still not an integral part of their work, which can to a large degree make it more difficult for citizens to access these services, and for the civil society to monitor public policies at this level. It also does not help to dispel the existing unethical and corrupt patterns and practices.

Regular monitoring with annual scores for each Montenegrin municipality can also serve as an incentive to improve the transparency. The *Transparency Index of Montenegrin municipalities*, which systematically and methodologically frames earlier activities in this area, is a direct contribution in this direction.

Several years of close monitoring of municipal websites, presumably the simplest method to inform the citizens about their work, shows that Montenegrin municipalities have made some progress. These websites are today visually better, more functional and richer in content than they were a few years ago. However, they still do not provide sufficient coverage of information and do not publish all of the documents, they are legally obliged to publish, nor many of those which they should be publishing proactively. The *Transparency Index of Montenegrin municipalities* provides an overview of the current situation, with detailed explanations that can be instructive to each municipality individually.

In addition to this information, the *Transparency Index of Montenegrin municipalities* also presents the findings of public opinion polls that survey citizens' perceptions of corruption in Montenegro.

The *Transparency Index of Montenegrin municipalities* emerged as part of the project 'Let's Put Corruption into Museum' implemented by the Centre for Civic Education (CCE) with the non-governmental organizations CeMI from Podgorica, Za Druga from Petrovac, Bonum from Pljevlja and UL-info from Ulcinj, in cooperation with the Agency for Prevention of Corruption and the Ministry of Public Administration, and with the support of the EU Delegation to Montenegro and co-financing by the Ministry of Public Administration. We hope that the future annual reviews will find Montenegrin municipalities scoring much better on transparency, and thus contributing to archiving corruption in our society.

METHODOLOGY

For the purposes of the research that focused on assessing the level of transparency of municipalities in Montenegro, the research team of the Centre for Civic Education (CCE) conducted an extensive review of the official website presentations of all municipalities, in accordance with a methodological framework developed to that check of availability of information and documents of public interest.

The review was conducted in January and February 2020, with additional checks on several items¹ during March 2020. Accordingly, the Index of Transparency of Montenegrin Municipalities for 2019 includes data that was on the municipalities' websites up the during period which our researchers checked the availability of documents/information, which means that discrepancies are possible if the information/documents were posted later or the websites changed.

The information of public interest that we expected to find on all municipal websites had been grouped into six thematic areas: *municipal assembly, budget, general information, public procurement, public discussions and public competitions.*

For each thematic area we developed six questions to test the availability of information in a way that corresponds to the recognized needs of citizens, as well as civil society organizations, who wish to gain effective insight into local public policies or access local government services. These are also the types of documents or information whose accessibility has been prescribed by various legal acts and by-laws and which should therefore easily accessible.

The complete list included 61 questions with a maximum of 100 points. Some questions carried a different number of points, one or two for information/documents that existed, with partial points given for partially available information or documents, and zero points if no information/document was available in that particular area.

The section related to the **municipal assemblies** covered the documented work and outcomes of decision-making within this body through 10 questions that carried a maximum of 15 points.

No.	Requested information / documents	Number of points
1.	<i>Are the decisions adopted by the municipal assembly during 2019 available on the website?</i>	2
2.	<i>Have voting results of the 2019 municipal assembly sessions been published on the website?</i>	1
3.	<i>Has the information on individual councillors' votes in 2019 been published on the website?</i>	1
4.	<i>Are explanations of the submitted amendments to the proposed acts that were discussed at the 2019 municipal assembly sessions published on the website?</i>	2
5.	<i>Da li su na sajtu objavljena obrazloženja podnijetih amandmana na prijedloge akata koji su razmatrani na sjednicama Skupštine opštine u 2019.godini?</i>	1
6.	<i>Is the agenda for the next session of the municipal assembly published on the website?</i>	2
7.	<i>Is the list of councillors of the municipal assembly published on the website?</i>	2
8.	<i>Does the website have individual contact information of the municipal assembly's councillors (telephone number, e-mail)?</i>	2
9.	<i>Are detailed minutes (transcripts) of municipal assembly sessions being published?</i>	1
10.	<i>Are the municipal assembly sessions broadcasted directly?</i>	1 ²

¹ It was additionally checked whether municipality presidents/mayors handed over to the Agency for Prevention of Corruption property records for 2019, as well as whether the reports on the work of the municipalities for 2019 and the final accounts for 2019 were published.

² The research team took note of information on public broadcasts available on the municipal websites, but also made independent checks through Internet search.

The second area included basic information and documents related to **budgeting and budget reporting** through 10 questions with a maximum score of 16 points.

No	Requested information / documents	Number of points
1.	<i>Is the budget for 2019 available on the website?</i>	2
2.	<i>Is the explanation of the budget for 2019 available on the website?</i>	1
3.	<i>Is the 2019 Budget published on the website in a machine-readable form (.xls or .xlsx format)?</i>	2
4.	<i>Are reports on budget execution for 2019 available on the website?</i>	2
5.	<i>Is the Citizens' Guide to the 2019 Budget published on the website?</i>	1
6.	<i>Is a public call for a public discussion on the 2019 budget published on the website?</i>	1
7.	<i>Was there a public discussion for the 2019 budget?</i>	2
8.	<i>Is a report on public discussion on the 2019 Budget published on the website?</i>	2
9.	<i>Has the final account of the budget for 2019 been discussed?</i>	2
10.	<i>Is the budget for 2020 available on the website?</i>	1

In the area of **fight against corruption**, the availability of information relevant for the prevention and suppression of corruptive acts at the local level was checked through 13 questions, with a maximum of 23 points.

No	Requested information / documents	Number of points
1.	<i>Is there information on the website about the available mechanisms for reporting corruption to the municipality?</i>	2
2.	<i>Is there an option on the website for the citizens to report unlawful or improper conduct?</i>	2
3.	<i>Do available mechanisms for the reporting of corruption and irregularities allow anonymous reporting?</i>	1
4.	<i>Is there a report or information available on the website about the number of filed and processed complaints in 2019?</i>	2
5.	<i>Is the Code of Ethics for employees available on the website?</i>	2
6.	<i>Has the Integrity Plan 2018-2020 been adopted?</i>	2
7.	<i>Has the Report on the Implementation of the Integrity Plan 2019-2020 been adopted?</i>	2
8.	<i>Has the 2019 Local Anti-Corruption Plan been adopted?</i>	2
9.	<i>Has the Report on Implementation of Local Anti-Corruption Plan for 2019 been adopted?</i>	2
10.	<i>Is information about salaries of public officials published on the website?</i>	1
11.	<i>Is information about salaries of employees published on the website?</i>	1
12.	<i>Is there a contact of the person appointed to respond to whistle-blower reports?</i>	2
13.	<i>Has the president of the municipality submitted a property report for 2019?</i>	2 ³

The section on **availability of general information** covered 15 questions, with a maximum of 25 points, which directly related to the general transparency of the work of municipalities and the availability of basic service information.

No	Requested information / documents	Number of points
1.	<i>Is information on local self-government's working hours available on the website?</i>	2
2.	<i>Is the list of municipal inspectorates published on the website?</i>	2
3.	<i>Is information on the municipality's responses to complaints, petitions and objections available on the website?</i>	2
4.	<i>Does the municipality's website have contact information of the presidents of local communities?</i>	2
5.	<i>Is contact information of the mayor or president of municipality available?</i>	2
6.	<i>Are there office hours during which the mayor or president of municipality receives citizens?</i>	1

7.	<i>Is the Rulebook on the Internal Organization and Systematization of Local Self-Government's Jobs published on the website?</i>	1 ⁴
8.	<i>Is the Strategic Plan for Municipal Development published on the website?</i>	2
9.	<i>Is the Annual Local Self-Government Work Plan published on the website?</i>	1
10.	<i>Has the 2019 Local Self-Government Work Report been published?</i>	2
11.	<i>Is the data on the number of employees in the municipality published on the website?</i>	1 ⁵
12.	<i>Has the data on the number of employees in the municipal enterprises and institutions been published on website?</i>	1 ⁶
13.	<i>Is an Information Access Guide available?</i>	2
14.	<i>Is there an overview of information provided in response to requests filed under the Law on Free Access to Information?</i>	2
15.	<i>Is there a contact of a person responsible for handling requests for free access to information?</i>	2 ⁷

Public procurement is one of the areas most vulnerable to corruption and therefore also requires a higher degree of transparency and control. This topic is covered by six questions with a maximum of 11 points.

No	Requested information / documents	Number of points
1.	<i>Is there a section dedicated to public procurement on the local self-government website?</i>	1
2.	<i>Is there information on public procurement tenders on the local self-government website?</i>	2
3.	<i>Has the information on the selected bidder been published on the local self-government website?</i>	2
4.	<i>Is data on public procurement carried out in 2019 published on the local self-government website?</i>	2
5.	<i>Has the Public Procurement Plan for 2019 been published on the local self-government website?</i>	2
6.	<i>Has the Public Procurement Plan Implementation Report for 2019 been published on the Local self-government website?</i>	2

Finally, the area of **public discussion and public competitions** was addressed through seven questions that totalled 10 points.

No	Requested information / documents	Number of points
1.	<i>Is there information on the local self-government website on public discussions conducted during 2019 (except budget)?</i>	2
2.	<i>Do the public discussion reports contain information on the proposals of stakeholders?</i>	2
3.	<i>Do the public discussion reports contain reasons for accepting/rejecting stakeholders' proposals?</i>	2
4.	<i>Are competitions for allocation of funds to media published on the website for 2019?</i>	1
5.	<i>Does the website contain information on any kind of competition for the media that have been carried out in 2019?</i>	1
6.	<i>Are competitions and results of funding competitions for NGOs carried out in 2019 published on the website?</i>	1
7.	<i>Are the results of competitions for funding for NGOs carried out in 2019 published on the website?</i>	1

This research has covered 24 municipalities and the city-municipality of Golubovci and all their websites active during the research period, which were reviewed and evaluated according to the information/documentation found on them at the time. It should be noted that these websites are generally visually satisfying, but in many

4 The research team looked for a single document that covered all organisational units, not those produced by separate units

5 The researchers looked for a detailed list, not only the names of employees within each unit.

6 The researchers looked for a detailed list, not only the names of names of employees in individual enterprises and institutions

7 The research team considered that there was a contact person if he/she was indicated in the Free Access to Information Guide or on the website itself in the contacts section.

cases their use value is questionable. Often, it was not easy for researchers to find some basic documents on the website or it was necessary to search for them through an internet browser. Therefore, it is possible that some of the requested documents can even be found on the municipal websites, but the opacity and/or inaccessibility through the search engine makes them unusable for citizens who have far less time or knowledge to engage in this type of search. It was often necessary to open a series of pages or subcategories on website to find a particular document. Essentially, the goal should be timeliness, completeness and accuracy with quick and easy accessibility for all stakeholders.

OVERALL ASSESSMENT OF THE TRANSPARENCY OF MUNICIPALITIES IN MONTENEGRO

In general, Montenegrin municipalities still have a lot of work to do to promote openness and transparency. Even the best rated municipalities in 2019 - Podgorica and Bijelo Polje - only scored just above one half of the total number of points, i.e. they have 58 points each.

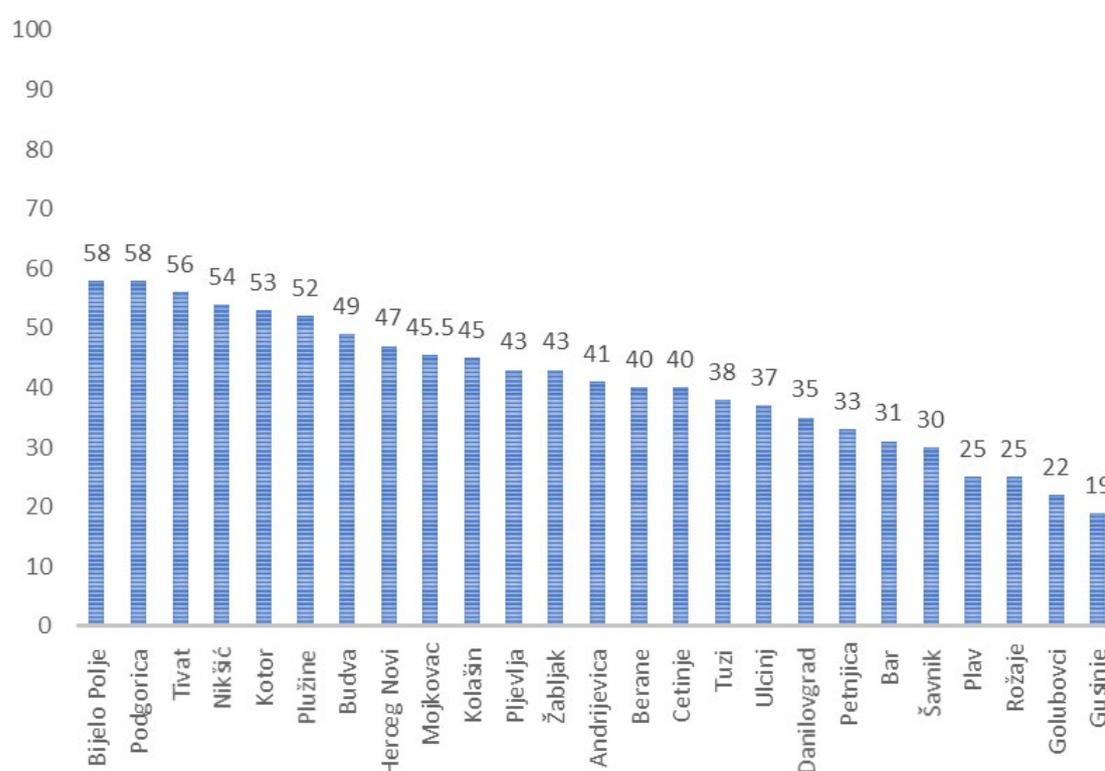


Chart 1: Summary assessment of all municipalities

This situation nevertheless represents a step forward within certain municipalities compared to the previous municipal transparency studies conducted by the CCE, although these were not as detailed and systematic as the present *Montenegrin Municipalities' Transparency Index*. Visually, websites are more interesting and clearer than before, making it easier for users to find information. Most websites also contain some information of public interest. These topics are placed under separate banners and are usually located in the middle or to the side of the home page, and include the budget, public procurement, documents, free access to information, public institutions, etc.

The youngest Montenegrin municipality, Tuzi, also has a website with a clear concept that is easy to search, which is positive. However, the content part requires serious improvements, as evidenced by the total number of points that the municipality received after assessment of all indicators.

Ranking list	Name of the municipality	Number of points
1.	Bijelo Polje Capital City Podgorica	58
2.	Tivat	56
3.	Nikšić	54
4.	Kotor	53
5.	Plužine	52
6.	Budva	49
7.	Herceg Novi	47
8.	Mojkovac	45.5
9.	Kolašin	45
10.	Žabljak Pljevlja	43
11.	Andrijevica	41
12.	Berane Cetinje	40
13.	Tuzi	38
14.	Ulcinj	37
15.	Danilovgrad	35
16.	Petnjica	33
17.	Bar	31
18.	Šavnik	30
19.	Plav Rožaje	25
20.	Golubovci	22
21.	Gusinje	19

Table 1: Ranking list of municipalities

Looking at the separate rankings for each assessment topic, we find municipalities that stand out in each of them. For example, when it comes to the availability of information on the *work of municipal assemblies*, Bijelo Polje, Budva and Pljevlja stand out, while Plav and Gusinje municipalities are the worst rated in this category.

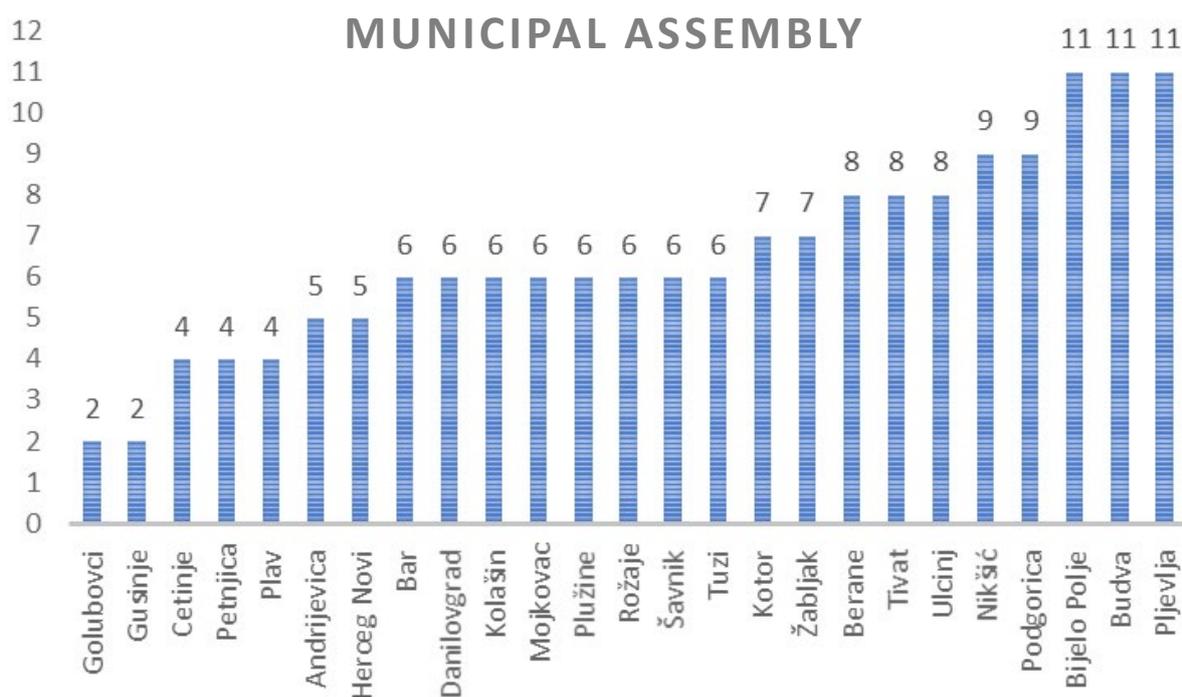


Chart 2: Overview of municipalities in the category of *municipal assemblies*

Regarding the availability of information about budget, Podgorica, Žabljak and Bijelo Polje are ahead, while the smaller municipalities Petnjica and Rožaje are at the tail-end.

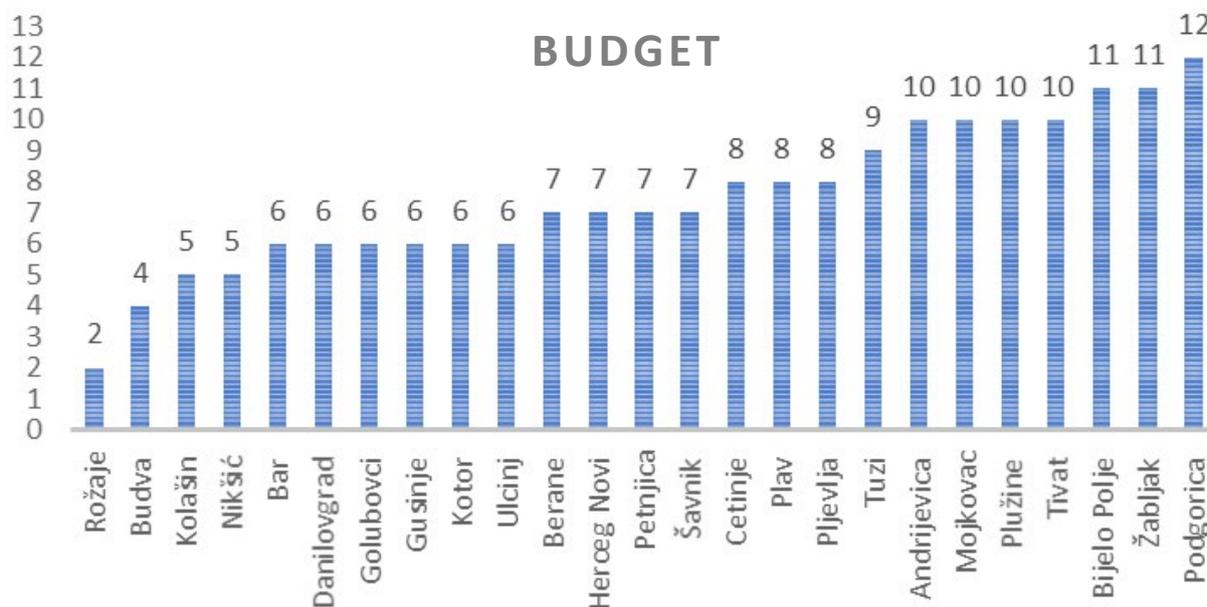


Chart 3: Overview of municipalities in the category of budget

As regards the *fight against corruption*, Kolašin and Kotor provide the most information deemed essential in this area, while the worst rated were Tuzi, Bar, Šavnik and the city municipality Golubovci.

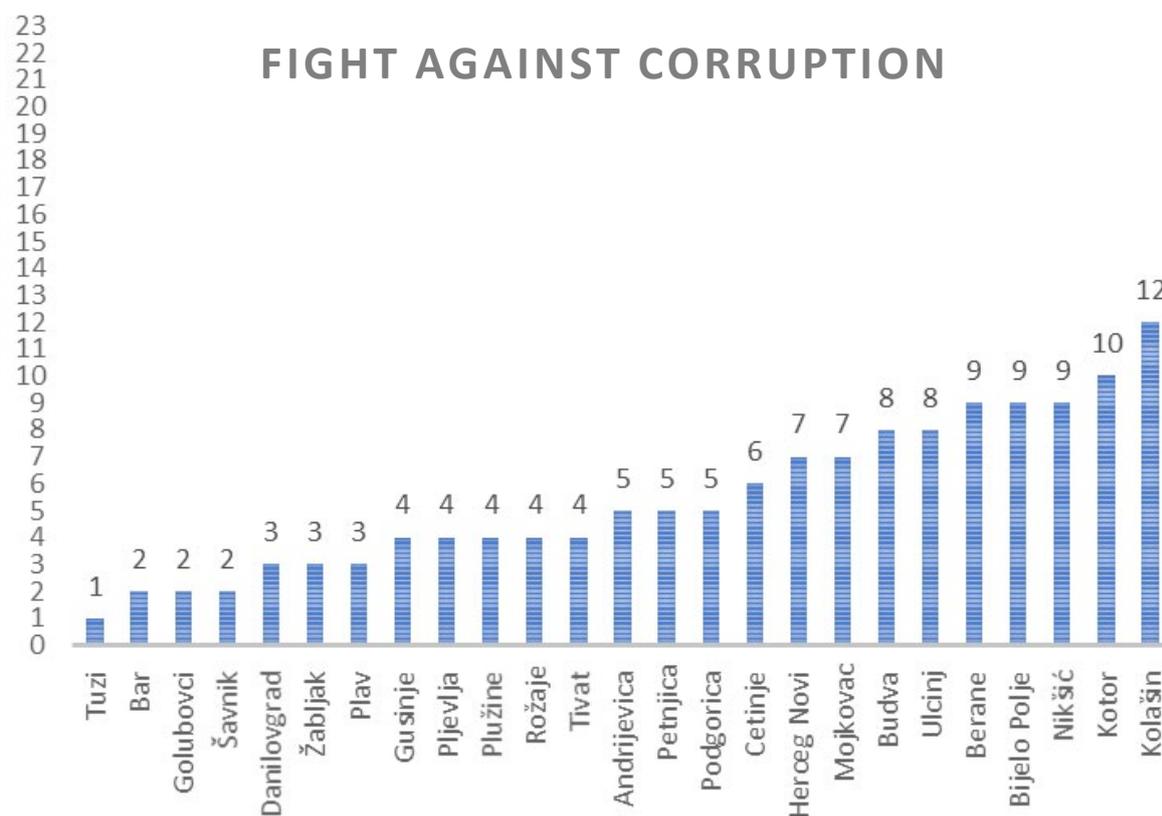


Chart 4: Overview of municipalities in the category of fight against corruption

The municipalities Bijelo Polje (17 points) and Tivat (16 points) ranked the best in the general *availability of information*, while the municipalities of Gusinje and Plav were the worst rated with three points each.

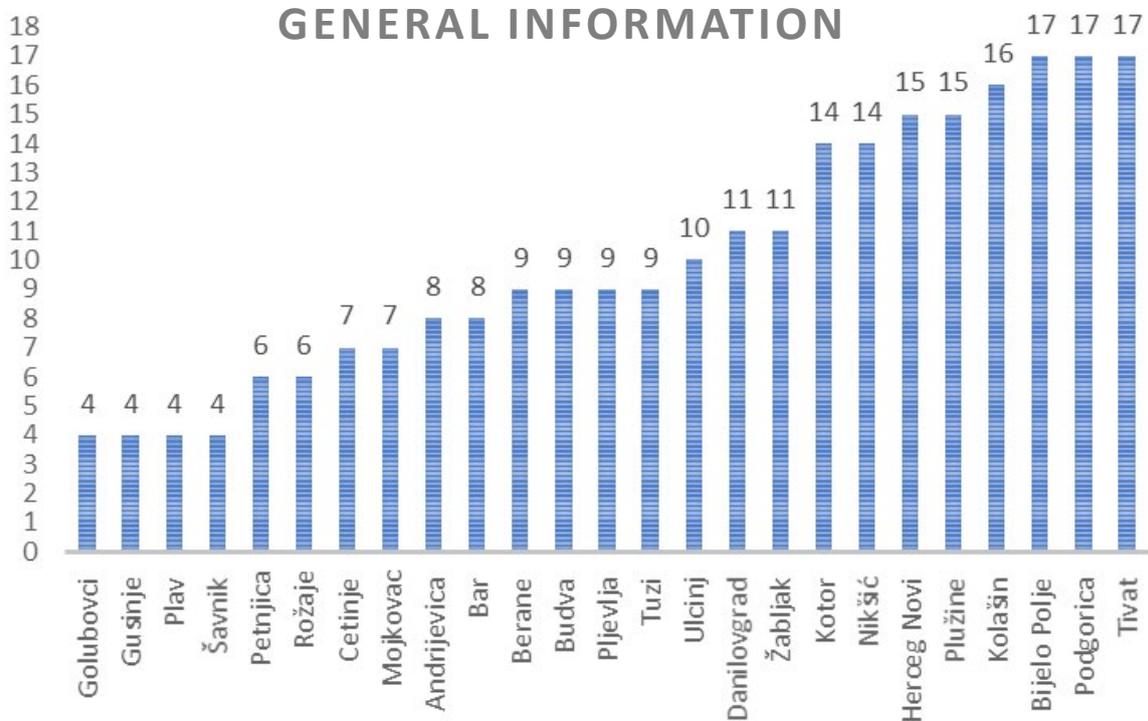


Chart 5: Overview of municipalities in the category of *availability of information*

When it comes to *public procurement*, during 2019, the most transparent according to our ranking was the municipality of Tuzi (11 points). This was also the only category in which any municipality received the maximum number of points. On the other side is the municipality of Gusinje with one point in this area.

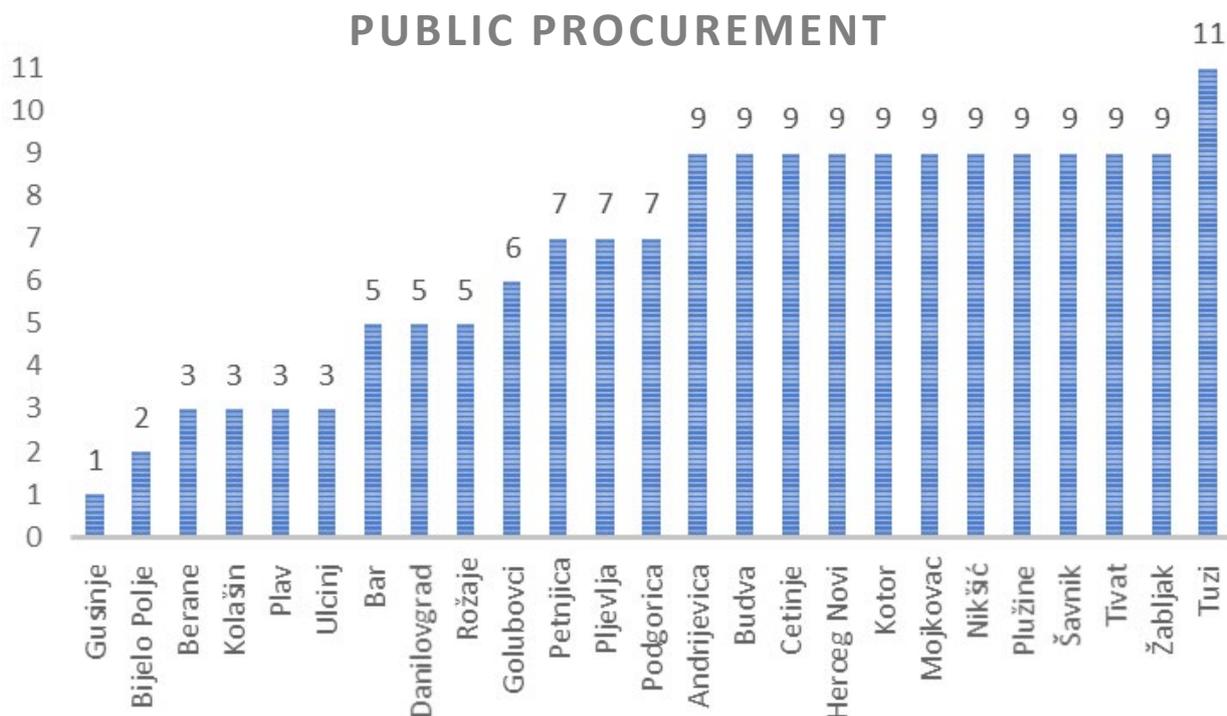


Chart 6: Overview of municipalities in the category of *public procurement*

Information on public discussions and public competitions represent one of the most frequently criticized areas of work of local self-governments. However, there are municipalities that have a solid number of points in this area. The leaders are the municipalities of Tivat, Podgorica, Plužine, Nikšić, Budva and Bijelo Polje with eight points each, while seven municipalities cluster at the opposite pole - Gusinje, Rožaje, Šavnik, Ulcinj, Tuzi, Žabljak and city municipality Golubovci.

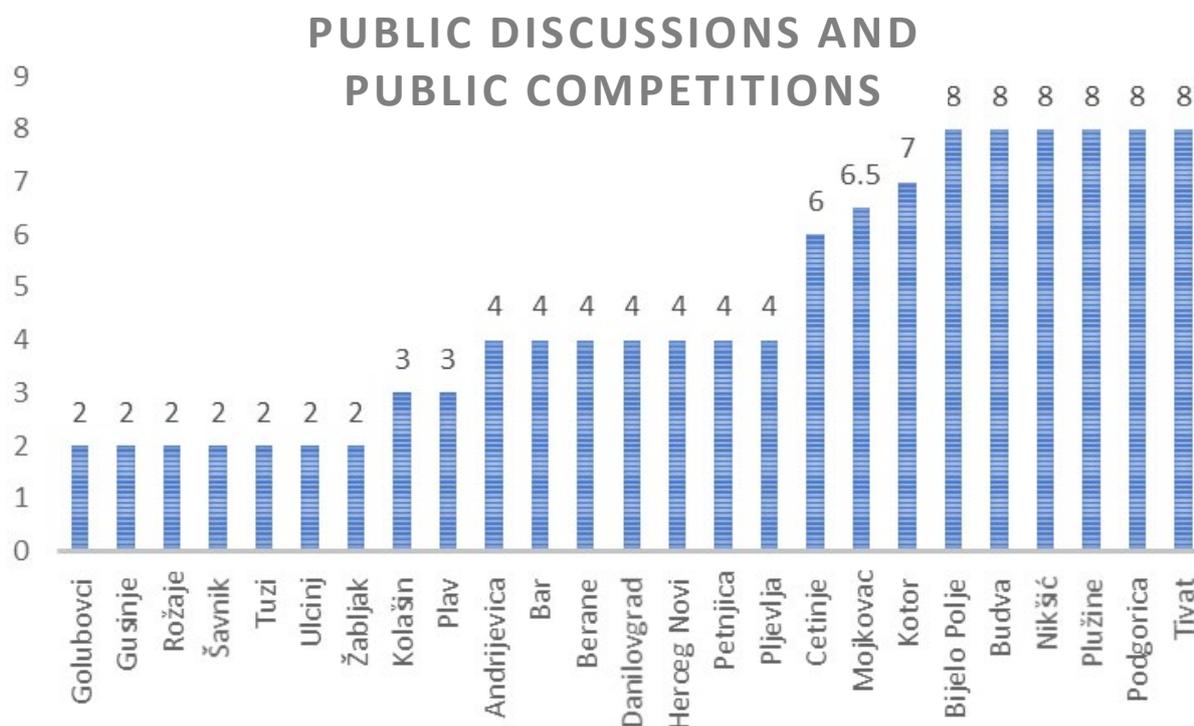


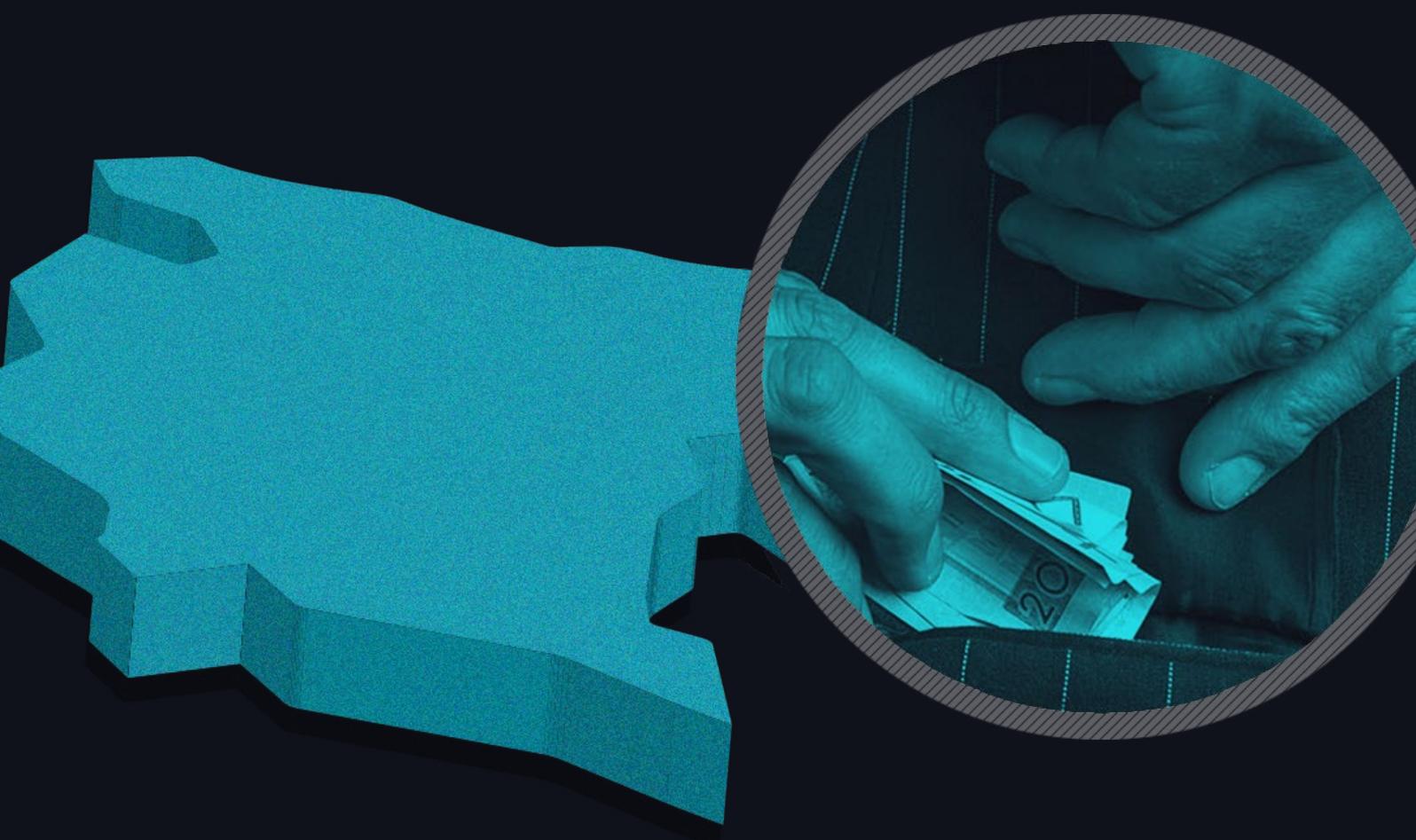
Chart 7: Overview of municipalities in the category of public discussions and public competitions

One aspect of the ranking that the CCE has been following most closely for years is the fight against corruption at the local level. The fact that Montenegrin municipalities still do not have a uniform approach to this issue is worrying, as we still do not have all the integrity plans available on municipal websites. More precisely, 10 municipalities published (Bijelo Polje, City Municipality Golubovci, Gusinje, Kolašin, Kotor, Mojkovac, Nikšić, Plav, Ulcinj and Žabljak) and 14 did not publish an integrity plan on the website. Some of them have published integrity plans, but it is not clear from that document which period it refers to (the municipality of Plav). No municipality has a publicly available report on the implementation of the integrity plan.

Local action plans have seemingly lost their significance, although according to the activities of certain municipalities, which can be followed on their websites, they are used for narrowly specific areas (municipalities of Berane and Nikšić and the Capital Podgorica).

Municipalities still do not attribute importance to compliance with Article 22 of the Law on Free Access to Information, which includes the annual publication and updating of the Guide to Free Access to Information. Thus, the updated guides for free access to information for 2019 have been published on the websites of the following municipalities: Bijelo Polje, Danilovgrad, Kolašin, Pljevlja, Plužine, Rožaje, Tivat, Tuzi, Ulcinj and Žabljak. There are some guides on the websites of other municipalities, but it is not always clear which year they refer to. In some municipalities, they were adopted at the end of December 2018, which the research team estimated to refer to 2019, and in those cases when they are available but not as a complete document, half a point was awarded.

HOW TRANSPARENT ARE MONTENEGRIN MUNICIPALITIES?



ANDRIJEVICA

<http://opstinaandrijevica.me>

Municipality Andrijevica is one of the better performing municipalities with 41 out of 100 points.

The distribution of points per category is as follows: Municipal Assembly - 5; budget - 10; fight against corruption - 5; availability of information - 8; public procurement - 9; public discussions and public competitions - 4.

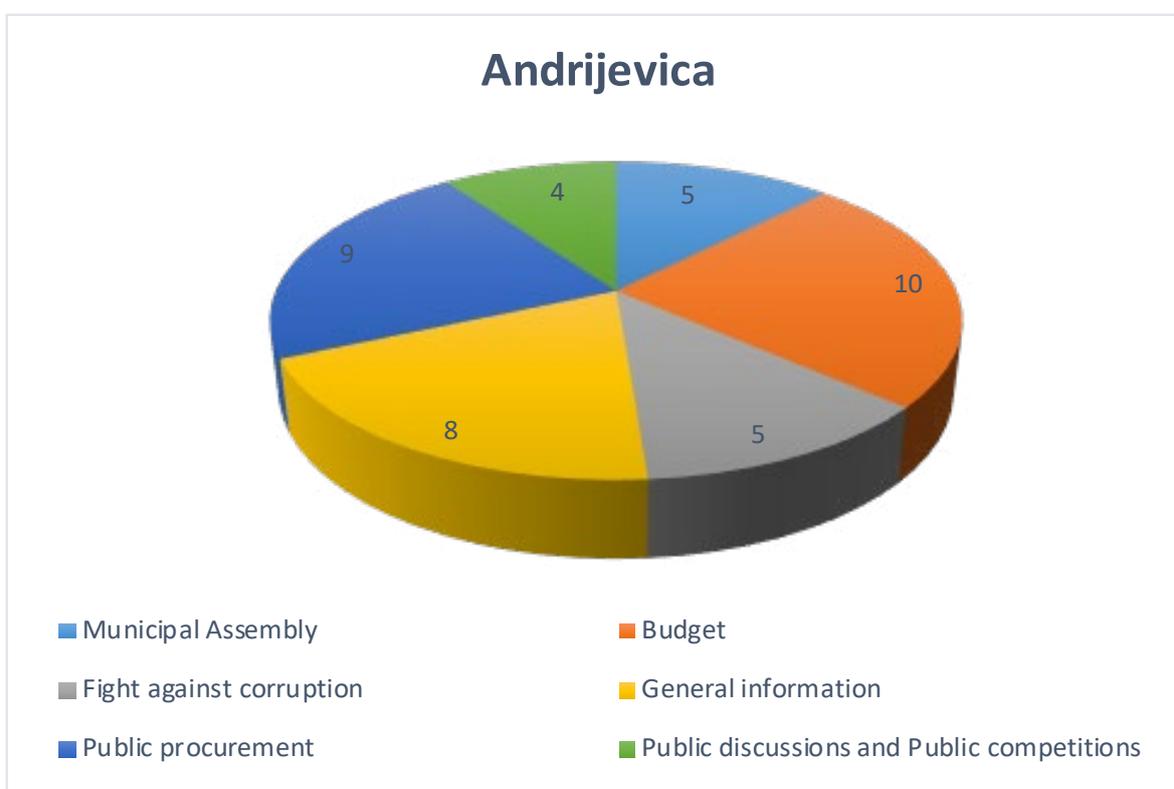


Chart 8: Overview of marks as per area in municipality of Andrijevica

The fact that this sum of points is below even of a half of the maximum indicates the need for further work on development of transparency of this municipality and its proactivity in publishing data of public importance.

• MUNICIPAL ASSEMBLY

Of the 10 documents our team searched for, only four were found on the Andrijevica municipality website - complete decisions adopted in 2019 by the Andrijevica Municipal Assembly (2 points) and the list of councillors (2 points), while voting results from the sessions (0.5 points) and minutes of the sessions were only partial, as they only related to five months in 2019 (0.5 points).

There is no information on the Andrijevica municipality website on how the councillors

individually voted in 2019, the proposed amendments to the discussed act, explanations of the amendments, the agenda of the next session of the Municipal Assembly session, contacts of the councillors, or whether the sessions are directly broadcasted via any local media.

• BUDGET

Regarding the Andrijevica Municipality Budget for 2019, six of the 10 required documents are available on the municipality's website. These include the 2019 Budget (2 points), the Budget Execution Report (2 points), the Public Call for a Public Discussion on the 2019 Budget (1 point), information on the conducted public discussion on the 2019 Budget (2 points), the Report on the Public Discussion on the Budget (2 points), as well as the 2020 Budget (1 point).

Researchers were unable to find an explanation of the Budget for 2019 on the website, nor a budget document in a mechanically readable format (.xls or -xlsx), since it was only available in PDF format. Also, there is no guide for citizens or any information on whether the Final Budget Account for 2019 of Andrijevica Municipality was discussed.

• FIGHT AGAINST CORRUPTION

With regard to the fight against corruption, three of the 13 requested documents or types of information are available, namely the Code of Ethics for Employees (2 points), the Local Anti-Corruption Plan (1 point) and the Property Report for 2019 of the municipality's president (2 points).

There is no information on the mechanisms for reporting corruption or the possibility for citizens to report irregularities or illegalities in the work of municipal services, either under their full name or anonymously. In addition, no report or information on the number of filed and processed complaints for 2019 is available, or whether the Integrity Plan for the period 2018-2020 has been adopted. Reports on the implementation of the Integrity Plan and Local Anti-Corruption Plan are also missing. Finally, neither the information on the salaries of public officials of employees nor the contacts of the person appointed to act on whistle-blower reports was published.

• AVAILABILITY OF INFORMATION

Out of the total of 15 requested pieces of information/documents, information on local community presidents (2 points) is available, as well as the contact of the President of Municipality (2 points), Rulebook on Internal Organization and Job Systematization (1 point), the Municipal Development Strategic Plan (2 points) and data on the number of employees in this municipality (1 point).

No information is available on the working hours of the local self-government, nor is there a full list of municipal inspections or information on the handling of complaints, petitions and objections. The website also does not specify office hours during which the president of the municipality receives the citizens, and there is no Annual Work

Plan of the municipality, or a Report on the work of the municipality for 2019. Data on the number of employees in public institutions and enterprises is also missing, as is the Guide for access to information from 2019, overview of approved requests filed under the Law on Free Access to Information or contact of a person responsible for answering such requests.

- **PUBLIC PROCUREMENT**

On the Andrijevica Municipality website there is a section dedicated to public procurement (1 point) with information on the published tenders for public procurement (2 points) and the selected bidders, as well as on the public procurement conducted in 2019. The website has a Public Procurement Plan for 2019 (2 points), but there is no report on the implementation of the Public Procurement Plan for 2019.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

There is data on the public discussions conducted in 2019. Competitions for funding (1 point) and results of the competitions for allocation of funds to NGOs (1 point) have been published. On the other hand, the reports on the public discussion do not contain information on the stakeholders' proposals, nor information on the reasons for accepting/rejecting the proposals, and there are no calls for competitions for media services or results of such competitions for 2019.

Overall score of the
Municipality of Andrijevica

41
points

BAR

www.bar.me

Municipality of Bar scored just 31 points on our transparency scale, which places it at the bottom of the transparency rank of Montenegrin municipalities.

The distribution of points across categories is as follows: Municipal Assembly - 6; budget - 6; fight against corruption - 2; availability of information - 8; public procurement - 5; public discussions and public competitions - 4.

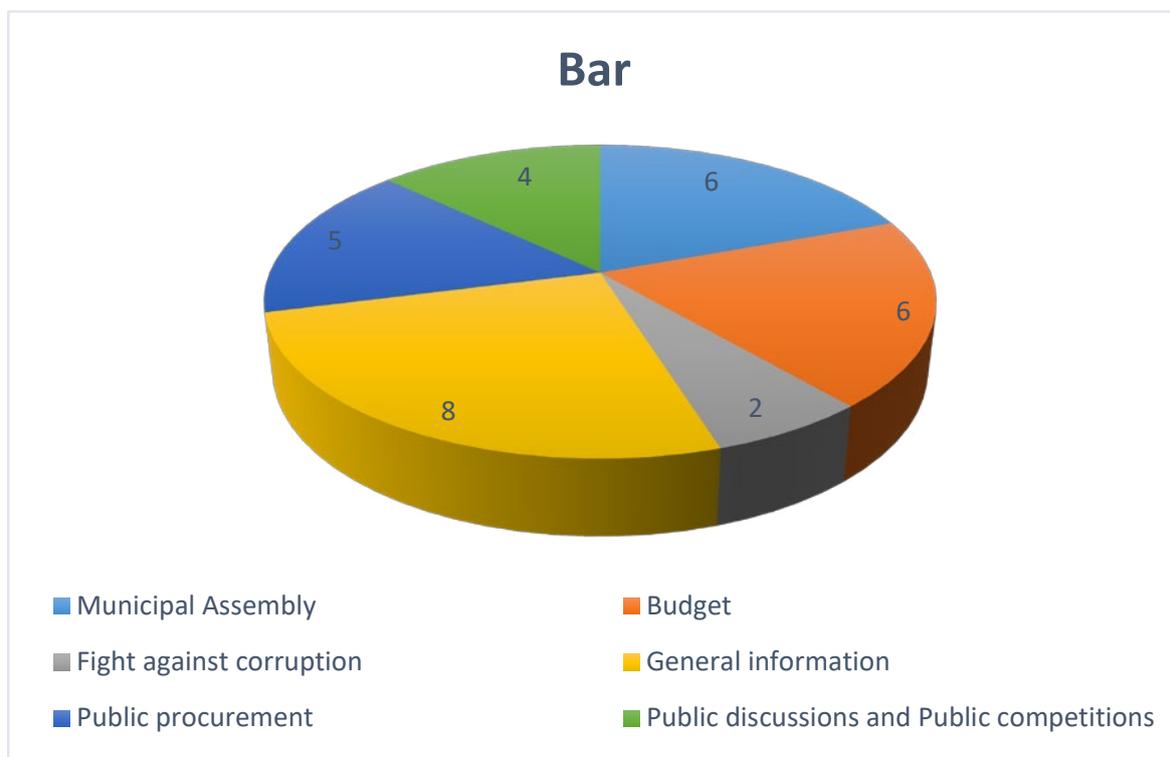


Chart 9: Overview of marks as per area in municipality of Bar

The municipality of Bar has a visually satisfactory and clear website, but the shortcomings are identified in terms of the representation of the data to which the law obliges, as well as those required by citizens.

• MUNICIPAL ASSEMBLY

Of the 10 documents that were searched for, only three were found - decisions adopted in 2019 by the Bar Municipal Assembly (2 points), the agenda of the next session (2 points) and the list of councillors (2 points).

The following documents were not found: voting results of the 2019 Municipal Assembly sessions, information on how the councillors individually voted in 2019, the proposed amendments to the discussed acts, as well as explanations of the 2019 amendments. Also, there are no contacts of the councillors, minutes of the sessions

of the MA, or information on whether the sessions were broadcasted during 2019 (only Information on the implementation of the Public Service Contract between the Municipality of Bar and Radio Bar for 2018 is available, which was considered in December 2019).

• BUDGET

Regarding the budget, four types of information/documents are available on the website. These include the 2019 Budget (2 points), the Public Call for a Public Discussion on the 2019 Budget (1 point), information that the public discussion for the 2019 Budget was conducted (2 points), and the 2020 Budget (1 point).

There is no explanation of the Budget for 2019 on the website, nor the Budget for 2019 in a mechanically readable format, the Budget Execution Report for 2019, the guide for citizens, the Report on the Public Discussion on the Budget, or the Final Budget Account for 2019.

• FIGHT AGAINST CORRUPTION

Regarding the fight against corruption, none of the 13 types of information required for the purpose of this research were on the Bar Municipality website. The only available information from this corps of issues was the 2019 property report of the municipality's president (2 points), which is on the website of Agency for Prevention of Corruption.

There is no information on the website about mechanisms for reporting corruption to the municipality, and therefore no option to report irregularities or illegalities via website. The website does not have either a report or information on the number of filed and processed complaints for 2019, the Code of Ethics for Employees, the Integrity Plan and the Local Anti-Corruption Plan, nor reports on the implementation of these plans. Also, information on the salaries of public officials and employees, as well as the contact of the person appointed to act on whistle-blowers reports, is also unavailable.

• AVAILABILITY OF INFORMATION

As regards to the availability of information, from a total of 15 pieces of information/documents that we searched for, there are five on the website of the Bar Municipality - working hours of the municipality of Bar (2 points), a list of municipal inspections i.e. only Utilities Inspections (1 point), contact information of the president of municipality (2 points), Guide for Free Access to Information (1 points) and contact of a person responsible for answering requests for free access to information (2 points).

Information such as the list of municipal inspections, handling complaints, petitions and objections, contacts of local community presidents, office hours during which the president of municipality receives the citizens, the Rulebook on Internal Organization and Job Systematization, the Municipal Development Strategic Plan or the Annual Municipal Work Plan, and the Report on the work of the municipality for 2019 is not available. The website does not contain data on employees in the municipality or

employees in public institutions and enterprises, as well as an overview of approved requests filed in accordance with the Law on Free Access to Information.

- **PUBLIC PROCUREMENT**

Of the six required pieces of information/documents, the Municipality of Bar made public the public procurement in a separate section on the website (1 point), as well as information on the selected bidders (2 points) and the public procurement conducted in 2019 (2 points). However, the website does not have information on public procurement tenders, the Public Procurement Plan, nor the Public Procurement Implementation Report for 2019.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Of the seven required types of information/documents in the part of public discussions and public competitions, information on the public discussions conducted during 2019 (2 points), competitions for funding and results of the competitions for allocation of funds to NGO (1 + 1 points) are available.

The research team was unable to find reports on the public discussions containing stakeholders' proposals or reasons for accepting or rejecting them. Also, there is no information on the website about competitions for allocation of funds to the media or the distribution of those funds.

Overall score of the
Municipality of Bar

31
points

BERANE

www.berane.me

Berane Municipality scored 40 points in this research, which places it in the category of medium transparent municipalities.

The distribution of points per category is as follows: Municipal Assembly - 8; budget - 7; fight against corruption - 9; availability of information - 9; public procurement - 3; public discussions and public competitions - 4.

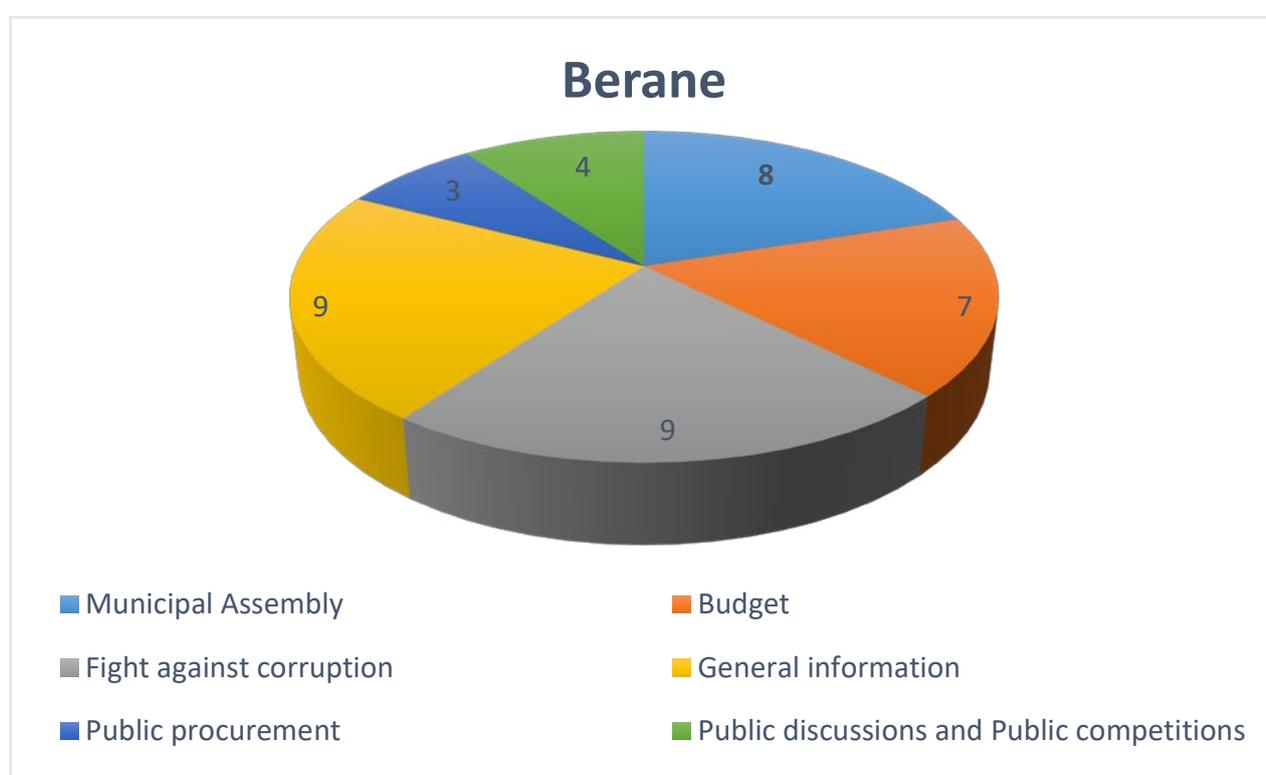


Chart 10: Overview of marks as per area in Municipality of Berane

The Berane Municipality website is well divided into areas required for public policy monitoring. However, some key pieces of information that are of importance to the citizens of Montenegro are missing.

• MUNICIPAL ASSEMBLY

Of the 10 required pieces of information/documents, the research team found five on the Berane Municipality website - decisions that Berane Municipal Assembly adopted in 2019 (2 points), voting results from those sessions (1 point), agenda of the sitting session (2 points), list of councillors (2 points) and information on direct broadcasting of Municipal Assembly's sessions via media (1 point).

There was no information on website on how the councillors individually voted at

the 2019 sessions, as well as proposed amendments to the discussed acts and the accompanying explanation of those amendments. Information on contact of the councillors and minutes of meetings is also missing.

• BUDGET

The budget section of the website contains the Berane Municipality Budget for 2019 (2 points), the Budget Execution Report for 2019 (2 points), the Public Call for Public Discussion on the 2019 Budget (1 point), information that a public discussion on the Budget for 2019 was conducted (1 point) and the Budget for 2020 (1 point).

Explanation of the 2019 Budget, a guide for citizens to the Budget and the Budget itself in a machine-readable format are all missing. Additionally, no report on public discussions on the Budget and the Final Account of the 2019 Budget have been published on the website.

• FIGHT AGAINST CORRUPTION

In the section related to information on the fight against corruption, on the website of the Municipality of Berane, citizens are provided with a system for reporting irregularities or illegalities (2 points), Code of Ethics for Employees (2 points), Local Anti-Corruption Plan for the period 2018 - 2020 (2 points), as well as information on salaries of the public employees (1 point). Additionally, the 2019 property report of the president of municipality is also available (2 points).

However, data on the mechanisms for reporting corruption to the Berane municipality is not available, nor is anonymity of the complaints provided, and there is also no report or information on the number of complaints filed and processed in 2019. In addition, the Integrity Plan and its implementation report, the Local Anti-Corruption Plan Implementation Report, information on salaries of employees, or the name of the person charged with acting on reports of whistle-blowers are not available.

• AVAILABILITY OF INFORMATION

General information, according to the indicators of the research in this section, that is available on the Berane Municipality website is limited. Namely, of the 15 required types of information/documents, five are available. These include a list of municipal inspections, i.e. only Utilities Inspection (1 point), contact of the President of Municipality (2 points), number of employees in the municipality (1 point), overview of approved requests filed under the Law on Free Access to Information (2 points), Guide to Free Access to Information (1 point), and a contact of a person responsible for answering requests for free access to information (2 points).

No information is available on the municipality's working hours, handling of complaints, petitions and objections, nor is there any contact information of community presidents. Also, office hours during which the president of municipality receives the citizens are not specified. The Rulebook on Internal Organization and Job Systematization is also not available. Also, the Municipal Strategic Development Plan, the Annual Municipal

Work Plan, the 2019 Work Report, as well as the number of employees in public institutions and enterprises are lacking as well.

- **PUBLIC PROCUREMENT**

This is one of the worst rated areas within Berane municipality when it comes to the availability of data on the website, and carries only three points. On the website, there is a section intended for public procurement (1 point) and information on public procurement (2 points). However, there is no information on the selected bidders, the public procurement conducted in 2019, the Public Procurement Plan for 2019 and the Report on its implementation.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Of the seven required types of information/documents, only three were available on the Berane Municipality website - data on public discussion (2 points), competitions for funding allocation to NGO in 2019 (1 point) and results of competitions for allocation of funds to civil society organizations (1 points). Data on stakeholders' proposals, explanations for accepting or rejecting them, competitions for awarding funds to the media and their results in 2019 have not been identified on the website

Overall score of the
Municipality of Berane

40
points

BIJELO POLJE

www.bijelopolje.co.me

The Municipality of Bijelo Polje, according to the indicators of this research, has scored 58 points, making it one of the two most transparent municipalities in Montenegro for 2019.

The distribution of points per category is as follows: Municipal Assembly - 11; budget - 11; fight against corruption - 9; availability of information - 17; public procurement - 2; public discussions and public competitions - 8.

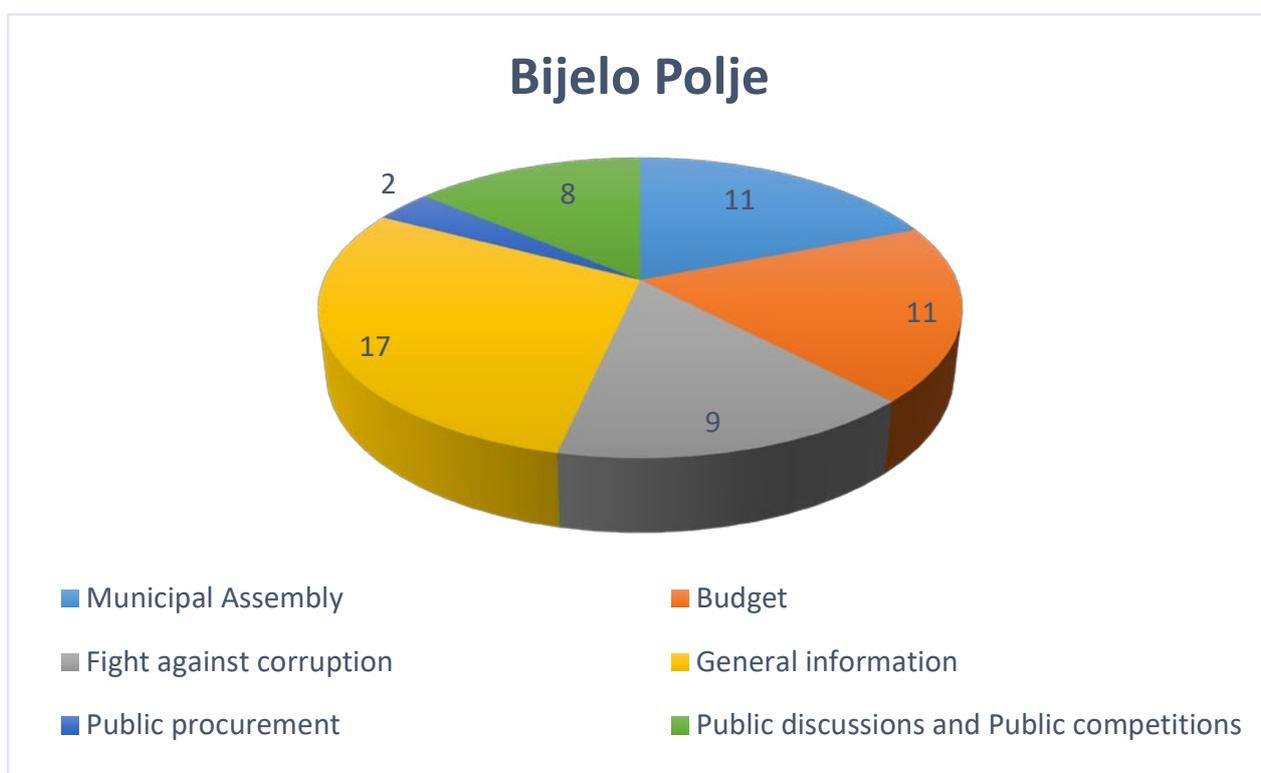


Chart 10: Overview of marks as per area in Municipality of Bijelo Polje

The Bijelo Polje Municipality's website is one of two websites that, compared to other Montenegrin municipalities, contains the largest amount of information required via this research, but also the ones required by the legal framework. This is information of public importance, which is necessary for proper monitoring of public policies, as well as informing of citizens about the work of the municipality.

• MUNICIPAL ASSEMBLY

The Municipality of Bijelo Polje made available seven out of ten required types of information in this category - decisions of the Municipal Assembly adopted in 2019 (2 points), including the results of voting from the sessions of the Municipal Assembly in 2019 (1 point), agenda of the next session (2 points), as well as a list of councillors (2 points) with contacts (2 points). The minutes of the sessions (1 point) are available

on the Bijelo Polje Municipality website, and the sessions themselves are broadcasted via the Bijelo Polje radio (1 point), information of which is also available.

There is no information available on the website on how the councillors voted individually nor proposed amendments to the acts discussed at the sessions or explanations for the amendments.

• BUDGET

In terms of availability of budget information, the website has the 2019 Budget (2 points), the Budget Execution Report for 2019 (2 points), guide for citizens (1 point), the Public Call for a Public Discussion on the 2019 Budget (1 point), information on the public discussion (2 points), as well as the Public Discussion Report (2 points) and the Budget for 2020 (1 point).

No explanation of the Budget for 2019 is available, nor is the Budget for 2019 itself available in machine-readable format, and there is no Final Account of the Budget for 2019.

• FIGHT AGAINST CORRUPTION

The Bijelo Polje Municipality website provides information on mechanisms for reporting corruption to the municipality (2 points), as well as the possibility for citizens to report irregularities or illegalities in work of local services. Furthermore, information on complaints and responses from the municipality is available, as well as the status of complaints, with an additional android application (2 points). Also, a Code of Ethics for Employees (2 points) and the Integrity Plan (2 points) is available, and information on salaries of public officials (1 point) is also published.

On the other hand, it is not possible to report corruption or irregularities anonymously, and there is no information on the number of filed and processed complaints for 2019. Also, there is no Report on the implementation of the Integrity Plan, the Local Anti-Corruption Plan or the Report on its implementation. In addition, there is no information on the name of the person who decides on whistle-blower reports, and the president of municipality did not submit a 2019 property report until the conclusion of this research.

• AVAILABILITY OF INFORMATION

In this part of the research, the Municipality of Bijelo Polje made available data on the handling of complaints, petitions and objections in the 48h system (2 points), the list of municipal inspections except the Utilities Police (1 point), the contact information of the presidents of communities (2 points), contact of President of Municipality (2 points), Rulebook on Internal Organization and job Systematization (1 point), Municipal Strategic Development Plan (2 points), data on the number of employees in the municipality (1 point), Guide for Free Access to Information (2 points), review of approved requests in accordance with the Law on Free Access to Information (2 points), as well as the contact of a person responsible for answering on such requests (2 points).

Local self-government opening hours are not available. There are no defined office hours during which the president of municipality receives the citizens, there is no Annual Work Plan and Work Report, as well as information on the number of employees in public institutions and companies.

- **PUBLIC PROCUREMENT**

A public procurement section exists on this site (1 point), and information on public procurement tenders is only partially available for low value procurement (1 point). There is no information on the selected bidders, the public procurement conducted in 2019, the Public Procurement Plan for 2019, nor is there a report available on the implementation of the Public Procurement Plan for 2019 on the website.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Data on conducted public discussions (2 points), with proposals from stakeholders (2 points), reasons for accepting or rejecting them (2 points), as well as the competitions for proposals for awarding funds to civil society organizations and the results of the competition (1 + 1 point) are available on website. There is no information on competitions or distribution of funds to the media.

Overall score of the
Municipality of Bijelo Polje

58
points

BUDVA

www.budva.me

The Municipality of Budva, according to the indicators of this research, has 49 points, which places it among the more transparent municipalities in Montenegro.

The distribution of points per category is as follows: Municipal Assembly - 11; budget - 4; fight against corruption - 8; availability of information - 9; public procurement - 9; public discussions and public competitions - 8.

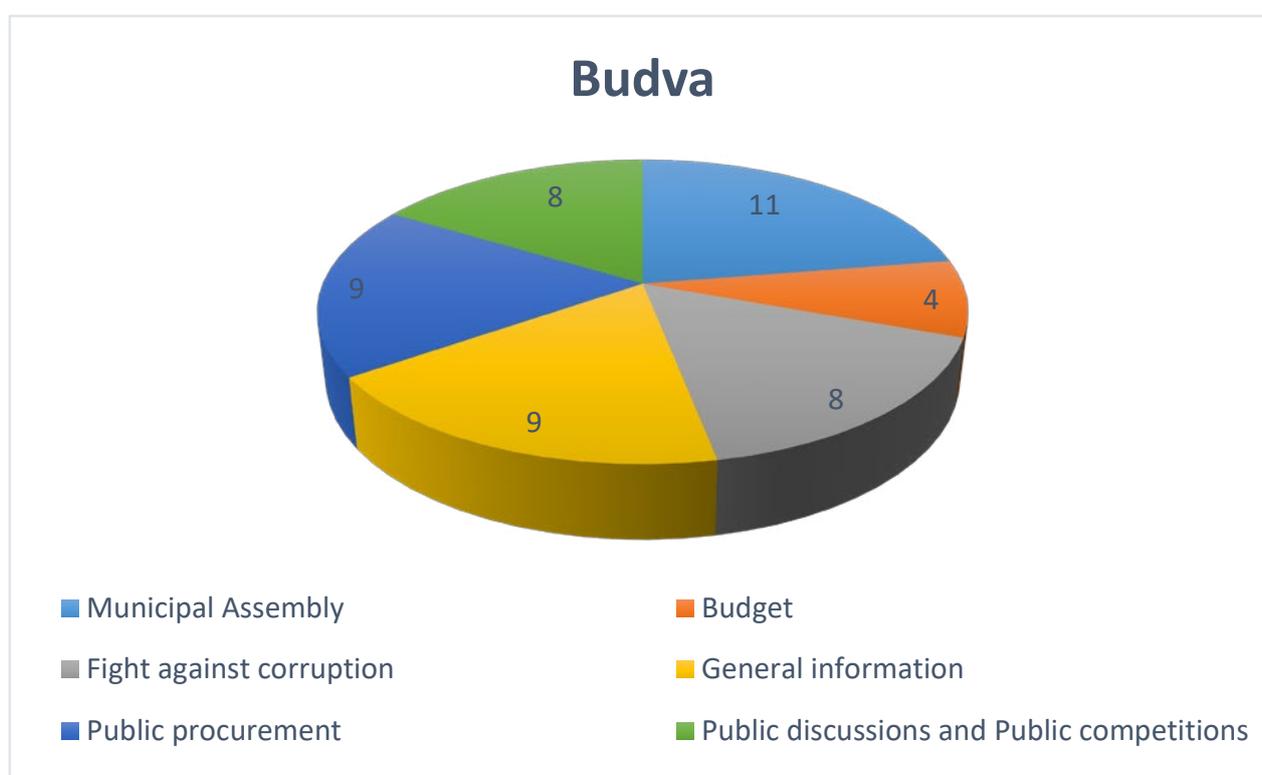


Chart 12: Overview of marks as per area in Municipality of Budva

The Budva Municipality website contains a significant amount of information, but also insufficiencies in the content part. This results in the fact that, despite the comparatively better result, the total number of points of the Budva municipality does not exceed even the half of what was the total number of indicators defined by the research.

• MUNICIPAL ASSEMBLY

Of the data for this area, the decisions adopted by the Budva Municipal Assembly during 2019 (2 points) with voting results from the sessions (1 point) are available. Also available on the website are proposed amendments to the discussed acts (2 points), with supporting explanations (1 points), the agenda of sessions (2 points), the list of councillors (2 points), and information that the sessions are broadcasted by Radio Budva (1 point).

No information is available on how the councillors voted individually, the contact details of the councillors and the detailed minutes of the sessions of the Budva Municipal Assembly.

• BUDGET

The Budva Municipality Budget for 2019 (2 points) is available on the website, with a citizen's guide (1 point), as well as a Public Call for a Public Discussion on the 2019 Budget (1 point).

On the other hand, the explanations of the Budget for 2019, reports on the implementation of the Budget, information on whether a public discussion was conducted, and the Report on the public discussion are not available. In addition, no budget for the 2020 Municipality of Budva was published on the website.

• FIGHT AGAINST CORRUPTION

In the section related to anti-corruption mechanisms, of the 13 required types of information defined by the research, the Budva Municipality website contains only three - information on mechanisms for reporting corruption to the municipality (2 points), the option for citizens to report irregularities in the work of local services, i.e. illegalities (2 points) and Code of Ethics for Employees (2 points). Additionally, the 2019 property report of president of municipality is available on the website of the Agency for Prevention of Corruption (2 points).

There is no manner to anonymously report corruption or irregularities in the work of local authorities on the website of Budva Municipality, there is no report available or information on the number of filed and processed complaints for 2019, there is no Integrity Plan and no report on its execution, and the same applies to the Local Anti-Corruption Plan and the accompanying report on implementation. There is also no information on salaries of public officials or employees nor information on the name of the person appointed to act on whistle-blower reports.

• AVAILABILITY OF INFORMATION

When it comes to the availability of general information, the Budva Municipality made available information/documents regarding contacts of the President of Municipality (2 points), a list of municipal inspections except the Utilities Police and the Utilities Inspection (1 point), contact information of the local community presidents (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), data on the number of employees in the municipality (1 point), and overview of approved requests filed under the Law on Free Access to Information (2 points).

On the other hand, no information is available on the working hours of local self-government, information on the handling of complaints, petitions and objections of citizens, nor is there a publicly available information on the office hours during which the president of the municipality receives the citizens. Also, the Municipal Strategic Development Plan, the Annual Municipal Work Plan, or the Report on the work of

municipality are not available. In addition, there is no data on the number of employees in public institutions and enterprises, an updated Guide to Free Access to Information, nor a contact of a person responsible for handling requests for free access to information.

- **PUBLIC PROCUREMENT**

The Budva Municipality website has a separate section dedicated to public procurement (1 point), as well as information on the public procurement tenders (2 points) and selected bidders (2 points). In addition, data on public procurement conducted in 2019 (2 points) and the Public Procurement Plan for 2019 (2 points) are available. The only information in this area that is not available on the website is the 2019 Procurement Implementation Report.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In this section, data on public discussions conducted during 2019 are available, except for the Budget (2 points), reports on conducted public discussions with data on stakeholders' proposals (2 points) and reasons for accepting or rejecting those proposals (2 points), competition for funding and decision on allocation of funds to civil sector organizations in 2019 (1 + 1 points). There is no information on the website about the competitions for funding or about any allocation of funds to the media in 2019.

Overall score of the
Municipality of Budva

49
points

CETINJE

www.cetinje.me

The Old Royal Capital of Cetinje, with 40 out of 100 points, is in the category of medium transparent municipalities.

The distribution of points per category is as follows: Municipal Assembly - 4; budget - 8; fight against corruption - 6; availability of information - 7; public procurement - 9; public discussions and public competitions - 6.

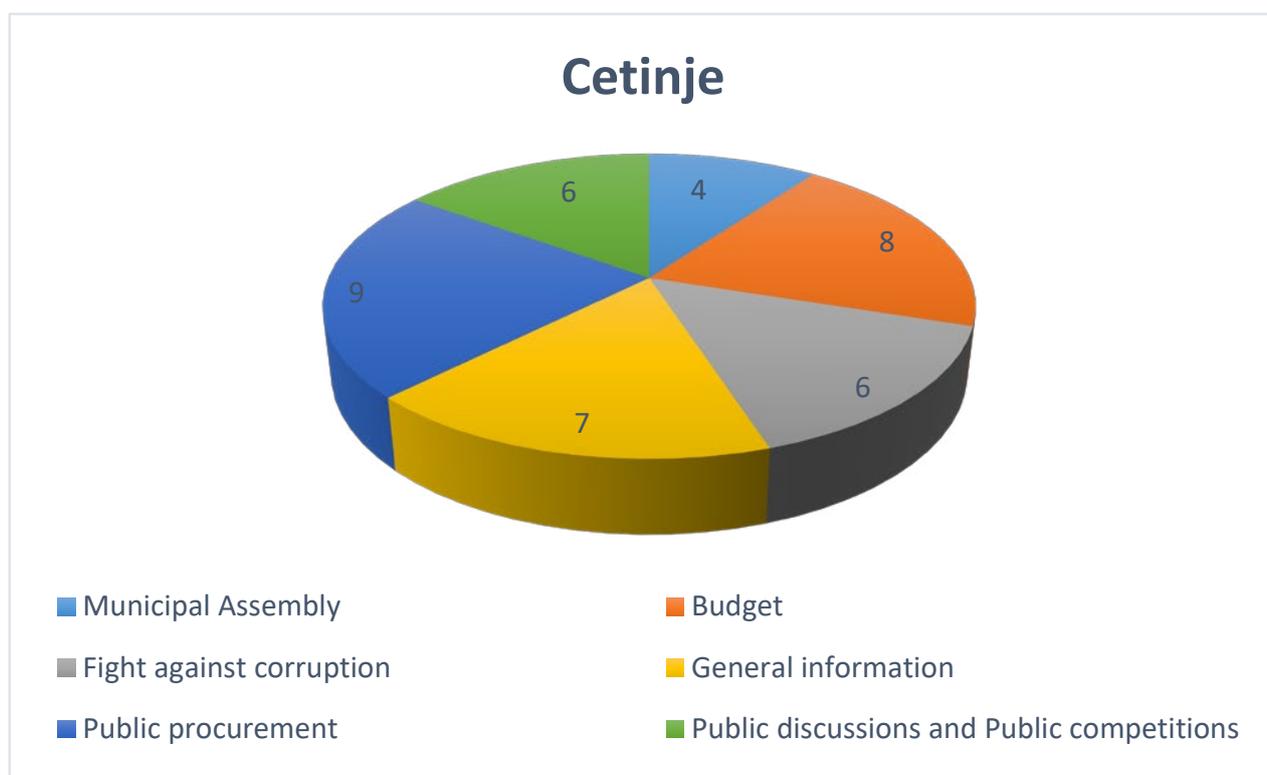


Chart 13: Overview of marks as per area in Old Royal Capital of Cetinje

The website of the Old Royal Capital of Cetinje is well designed with a clear categorization by areas that refer to documentation and information in the area of public policies and customer services. However, in many parts it has not been substantially updated and lacks data that is relevant to citizens of Montenegro.

• MUNICIPAL ASSEMBLY

Of the 10 pieces of information/documents that we searched for within the indicators of this research, only two are available on the website of the Old Royal Capital of Cetinje - the agenda of the next session of the Old Royal Capital Assembly (2 points) and the list of councillors (2 points).

The website of the Capital of Cetinje does not have the voting results from the 2019 Assembly sessions, nor information on how the councillors individually voted in 2019. Also,

there are no contacts of the councillors, decisions adopted by the Assembly of the Old Royal Capital in 2019, proposed amendments to the discussed acts, explanations of the amendments, data on the broadcasting of sessions via local media, or minutes of the sessions of the Assembly of the Old Royal Capital.

• BUDGET

Of the 10 required documents in the budget area, five are available on this municipality's website - 2019 Budget (2 points), Public Call for Public Discussion on the 2019 Budget (1 point), information that a public discussion on the Budget for 2019 was conducted (2 points), Public Discussion Report (2 points) and Budget for 2020 (1).

The explanation of the 2019 Budget could not be found on the website, nor the 2019 Budget document in a mechanically readable format (.xls or -xlsx), the 2019 Budget Execution Report, a citizens' guide nor information on whether the Final Account of the Budget for 2019 was discussed.

• FIGHT AGAINST CORRUPTION

Of the 14 required types of information/documents in this section, only three were available - the option for citizens to report irregularities or illegalities in the work via the 48h system (2 points), the Code of Ethics for Employees (2 points) and the property report of the mayor (2 points).

There is no information on the mechanisms for reporting corruption on website, which means that there is no possibility of reporting these cases anonymously. In addition, neither a report nor information on the number of filed and processed complaints for 2019 is available, or information on whether the Integrity Plan for the period 2018-2020 has been adopted. There is no published Local Anti-Corruption Plan, nor report on the implementation of that plan. The Integrity Plan is also missing. Neither the information on the salaries of public officials and employees nor the contact of the person appointed to act on whistle-blower reports are available.

• AVAILABILITY OF INFORMATION

Of the 15 required pieces of information/documents, the list of municipal inspections (1 point), the contact of the Mayor (2 points) and contacts of the presidents of local communities (2 points), the Annual Plan of the Old Royal Capital's Work (1 point) and the review of approved requests filed in accordance with the Law on Free Access to Information (1 point) were identified on the website of the Old Royal Capital Cetinje.

No information is available on the working hours of the Old Royal Capital, nor on the handling of complaints, petitions and objections. The website also does not specify or define office hours during which the mayor receives the citizens, the 2019 Work Report of the Old Royal Capital, the Strategic Development Plan of the Old Royal Capital and data on the number of employees in the Capital. In addition, the Rulebook on the Internal Organization and Jobs Systematization of the Old Royal Capital, information on the number of employees in the Old Royal Capital, the Guide

for Free Access to Information and the contact of the person tasked with answering the requests for free access to information are not published.

- **PUBLIC PROCUREMENT**

On the website of the Old Royal Capital of Cetinje there is a section dedicated to public procurement (1 point) with information on published tenders for public procurement (2 points) and on the selected bidders (2 points). Also data on public procurement conducted in 2019 (2 points) and the Public Procurement Plan for 2019 are available, while the Report on the Implementation of the Public Procurement Plan for 2019 is not published.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Data on public discussions conducted in 2019 except for the Budget (2 points) are published, as well as stakeholders' proposals in public discussions reports, and reasons for accepting or rejecting those proposals. There is no information available on the competitions for funding or funds allocated for the media in 2019, as well as information on the competitions for awarding funds to civil society organizations for 2019 and the manner of their allocation.

Overall score of the Old
Royal Capital Cetinje

40
points

DANILOVGRAD

www.danilovgrad.me

The municipality of Danilovgrad was one of the worst rated in the CCE research on transparency of local self-governments in 2018, but it has progressed in this period and has 35 points.

The distribution of points across categories is as follows: Municipal Assembly - 6; budget - 6; fight against corruption - 3; availability of information - 11; public procurement - 5; public discussions and public competitions - 4.

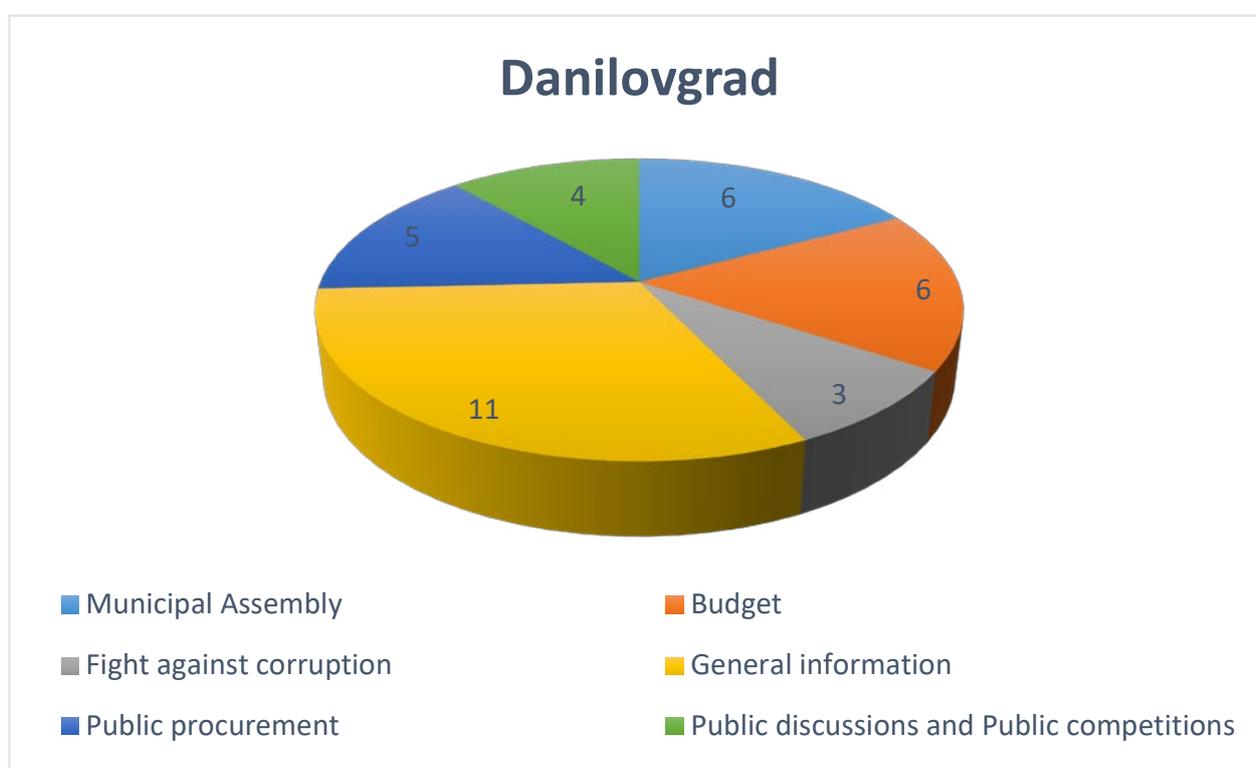


Chart 14: Overview of marks as per area in municipality of Danilovgrad

The Municipality of Danilovgrad has made a step forward in terms of its transparency, but also the appearance of the website itself, which is now more transparent and more user-oriented. However, a large number of information/documents are still unavailable and therefore it need serious improvement.

• MUNICIPAL ASSEMBLY

Decisions of the Municipal Assembly adopted during 2019 (2 points), the agenda of sessions of the Municipal Assembly (2 points) and the list of councillors (2 points) are available on the Danilovgrad Municipality's website.

Numerous documents/pieces of information are missing, such as: results of voting of councillors from municipal assembly meetings in 2019, how councillors voted

individually, proposed amendments acts discussed on sessions of the Municipal Assembly in 2019, accompanying explanations of amendments, contacts of councillors, minutes of sessions of the Municipal Assembly, as well as information on live broadcasts through certain local media.

• BUDGET

The only information that can be found on the website of Danilovgrad Municipality, in this area, is the Public Call for Public Discussion on the Budget for 2019 (1 point), information that this public discussion was conducted (2 points), Public Discussion Report (2 points) and the 2020 Budget.

The website does not have a Budget for 2019, which was probably deleted from the website, as well as an explanation of the Budget for 2019, and consequently there is no Budget in machine-readable form. There is also no Budget Execution Report, a citizens' guide to the Budget nor a Final Budget Account for 2019.

• FIGHT AGAINST CORRUPTION

There is no information on the mechanisms for reporting corruption on the website of Danilovgrad Municipality, nor on the manner in which interested citizens could report irregularities or illegalities of local services, and consequently there is no possibility of anonymous reporting.

The website does not have reports or information on the number of filed and processed complaints for 2019, the Code of Ethics for Employees, the Integrity Plan, the Local Anti-Corruption Plan, nor any reports on the implementation of these plans. Also, no information is available on the salaries of officials and neither is information on who has been appointed to act on whistle-blower reports. The only two pieces of information that are available relate to salaries of the public officials (1 point) and the property report of the president of municipality (2 points).

• AVAILABILITY OF INFORMATION

In this section, the Danilovgrad Municipality website has contact information of the presidents of communities (2 points), the contacts of the President of Municipality (2 points), the Municipal Strategic Development Plan (2 points), the number of employees of Danilovgrad Municipality (1 point), the Guide for free access to information (2 points), overview of approved requests filed in accordance with the Law on Free Access to Information (2 points) and contact of a person responsible for answering such requests.

However, there is no information on working hours, nor the list of municipal inspections, data on the handling of complaints, petitions and objections, office hours during which the president of the municipality receives the citizens, Rulebook on Internal Organization and Job Systematization, Annual Municipal Work Plan, the report on the work of the municipality, number of employees in public institutions and enterprises, and contact of a person answering requests for free access to information.

- **PUBLIC PROCUREMENT**

The Municipality of Danilovgrad created a separate section on public procurement (1 point) on its website, and it has published data on the selected bidders (2 points), as well as data on conducted public procurement (2 points). However, data on public procurement competitions, as well as the Public Procurement Plan and public procurement's reports are not available to the public.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In the part of public discussions and public competitions, the Municipality of Danilovgrad made available on the website only data on conducted public discussion except the Budget (2 points), NGO funding competitions and the results of those competitions (1 + 1 point). The public discussions' reports do not contain information on stakeholders' proposals, nor the reasons for accepting or rejecting them, and there are neither open competitions for the award of funds to the media nor the results of those competitions.

Overall score of the
Municipality of Danilovgrad

35
points

GOLUBOVCI

<http://podgorica.me/opstina-golubovci/>

City Municipality Golubovci with 22 out of a total of 100 points, according to the indicators of this research, is one of the most non-transparent municipalities in Montenegro.

The distribution of points across categories is as follows: Municipal Assembly - 2; budget - 6; fight against corruption - 2; availability of information - 4; public procurement - 6; public discussions and public competitions - 2.

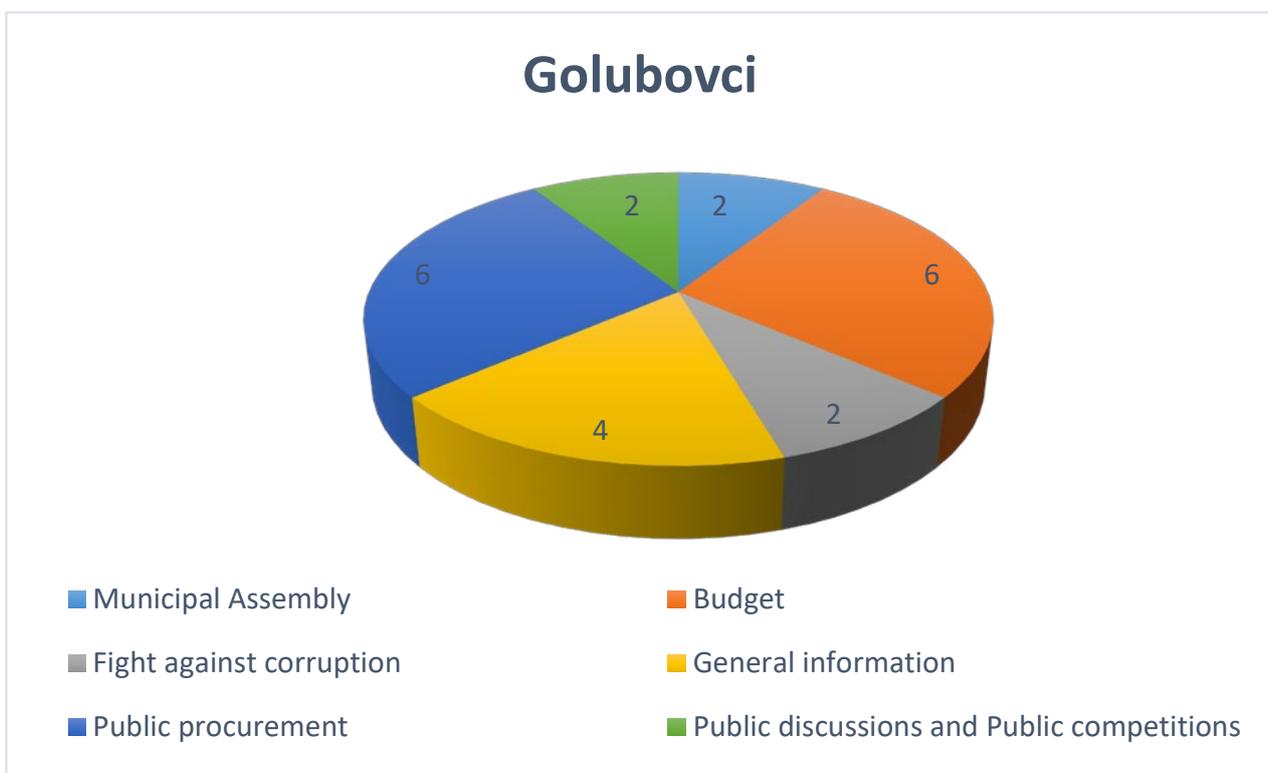


Chart 15: Overview of marks as per area in City Municipality Golubovci

As a city municipality within the Capital City of Podgorica, the Municipality of Golubovci does not have its own website, but rather shares information, through a separate category, within the website of the Capital City. This may have an effect on making data more difficult for users, but it should be emphasized that there is not much data at all, which requires the authorised organs to address this issue.

• MUNICIPAL ASSEMBLY

Of the 10 documents required in this area, only one was available - complete decisions adopted by the Municipal Assembly in 2019 (2 points).

The part of the website of the Capital of Podgorica that is dedicated to the Golubovci Municipality has no amendments to the acts considered, the explanations of these

amendments, the lists and contacts of councillors, how the councillors voted individually in 2019, the minutes from the sessions of the Municipal Assembly, information on whether the sessions of the Municipal Assembly are broadcasted through the media, the agenda of the next session, or the results of voting from the sessions during 2019.

• BUDGET

Of the 10 required documents in the budget area, only three are available on the website. Within the explanation of the Capital City's Budget there is also the City Municipality Golubovci Budget (2 points), the City Municipality Golubovci Budget explanation (1 point), as well as the City Municipality Budget for 2020 (1 point).

There is no mechanically readable budget on the website (.xls or -xlsx), information on whether the Final Budget Account for 2019 was discussed, the Budget Execution Report, the Public Invitation for Public Discussion on the Budget for 2019, or information whether it was even held, nor any reports or guides for citizens.

• FIGHT AGAINST CORRUPTION

When it comes to mechanisms of the fight against corruption, there is hardly any data. More specifically, of the 14 required pieces of information/documents, only the 2018-2020 Integrity Plan (2 points) is available.

There is no information on how to report corruption or the possibility to report irregularities in the work of local services, and there are no reports or information on the number of filed and processed complaints for 2019. In addition, information on the salaries of employees and public officials, contacts of the person appointed to act on whistle-blower reports, the Code of Ethics for Employees and the Local Anti-Corruption Plan for 2019, as well as reports on the implementation of the Integrity Plan and the Local Anti-Corruption Plan have not been published. Also, until the completion of this report, the president of the municipality within the Capital City did not submit an annual property report to the Agency for Prevention of Corruption.

• AVAILABILITY OF INFORMATION

The Municipality of Golubovci website has three of the 15 required general pieces of information/documents - contact of the President of Municipality (2 points), Rulebook on Internal Organization and Job Systematization (1 point) and number of employees in the municipality (1 point).

No information is available on complaints, petitions and objections, contact information of the presidents of communities, the Municipal Development Strategic Plan, the Annual Municipal Work Plan and Report on the work, local government working hours and the list of municipal inspections. The office hours during which the president of municipality receives the citizens and the working hours of the municipality are not specified, and there is no information on the number of employees in public institutions and enterprises. Also, there is no Guide to Access to Information, overview

of approved requests filed under the Free Access to Information Law, or contact of a person responsible for answering such requests.

- **PUBLIC PROCUREMENT**

On the website of the Golubovci Municipality, information is available about published tenders for public procurement (2 points), selected bidders (2 points) and public procurement conducted in 2019 (2 points). There is no separate section dedicated to public procurement, the Public Procurement Plan for 2019, nor the Report on Implementation of the Public Procurement Plan for 2019.

- **PUBLIC DISCUSSION AND PUBLIC COMPETITIONS**

In this area, there are published competitions for funding for civil society organizations and the results of those competitions (1 + 1 point), but there are no data on public discussions conducted in 2019 except the Budget, public discussions' reports containing data on stakeholder proposals and reasons for the acceptance or rejection of these proposals, or the information on media allocations in 2019.

Overall score of the City
Municipality of Golubovci

22
points

GUSINJE

www.opstinagusinje.me

According to the parameters of this research, the Municipality of Gusinje was rated the worst in terms of transparency of local self-governments in Montenegro with a total of 19 points.

The distribution of points per category is as follows: Municipal Assembly - 2; budget - 6; fight against corruption - 4; availability of information - 4; public procurement - 1; public discussions and public competitions - 2.

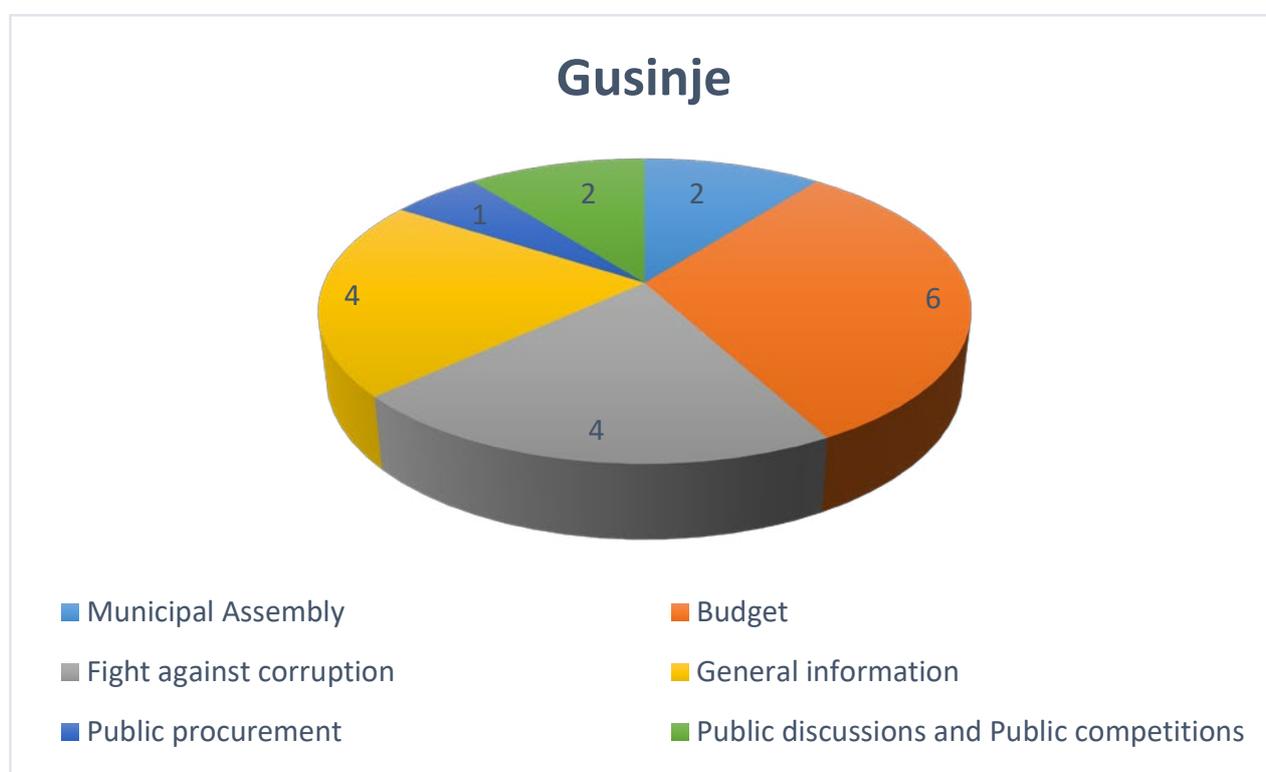


Chart 16: Overview of marks as per area in Municipality of Gusinje

One of the youngest municipalities in Montenegro has a highly expressed non-transparency regarding the availability of information that is of importance for monitoring public policies, but also for the needs of citizens.

• MUNICIPAL ASSEMBLY

On the Gusinje Municipality's website, in the section of information on the work of the Municipal Assembly, of the 10 required documents/types of information, only data on councillors are available, i.e. their list (2 points).

There are no adopted decisions of the Municipal Assembly, voting results or individual votes of councillors, as well as amendments to the proposals and explanations of the amendments. In addition, the agenda of the Municipal Assembly session, the contact

details of the councillors, the minutes from the sessions of the Municipal Assembly, as well as the information on direct broadcasting via media are not available.

• BUDGET

On the Gusinje Municipality website, of the 10 required types of information/documents related to the budget, four are available - Budget for 2019 (2 points), Public Invitation for Public Discussion on Budget for 2019 (1 point), information that a public discussion on the Budget for 2019 was conducted (2 points) and the Budget for 2020 (1 point).

The website does not have an explanation of the 2019 Budget, nor does it have a machine-readable budget. Also, the Public Discussion Report on the Budget for 2019, the Report on the Implementation of that Budget, the Guide to the Budget for Citizens and the Final Account of the Budget for 2019 are not available.

• FIGHT AGAINST CORRUPTION

As part of the fight against corruption, the Municipality of Gusinje made only the Integrity Plan (2 points) available on its website. Also, the president of municipality submitted the 2019 property report (2 points) to the Agency for Prevention against Corruption.

There is no information available on the mechanisms for reporting corruption, as well as the option for citizens to report irregularities or illegalities in the work of municipal services, and therefore there is no defined possibility of doing so anonymously. Additionally, there are no reports or information on the number of filed and processed complaints for 2019. In addition, the website does not have a Code of Ethics for Employees, a Report on the Implementation of the Integrity Plan, a Local Anti-Corruption Plan, a Report on the Implementation of the Local Anti-Corruption Plan, data on the salaries of public officials and employees, and data on a person appointed to act on whistle-blower reports.

• AVAILABILITY OF INFORMATION

In the area of availability of general types of information/documents, of the 15 that we searched for, only three are on the website - lists of municipal inspections in the part of the Utilities Inspection (1 point), contact information of the President of Municipality (2 points) and overview of approved requests filed in accordance with the Law on Free Access to Information (1 point).

The website does not have available information on the working hours of this municipality, office hours during which the president of municipality receives the citizens, or the contacts of the presidents of communities. Also, there is no information on the handling of complaints, petitions and objections, the Rulebook on Internal Organization and Jobs Systematization, the Municipal Strategic Plan, the Annual Work Plan and the Work Report, data on the number of employees in the municipality and its public institutions and enterprises, the Guide to Free Access to Information, as well as a contact of a person answering the requests for free access to information.

- **PUBLIC PROCUREMENT**

The Municipality of Gusinje has a separate section dedicated to public procurement (1 point) on its website. However, there is no information on public procurement competitions, selected bidders, as well as the Public Procurement Plan for 2019, the Report on the Implementation of that public procurement plan or the data on conducted public procurement.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In the part of public discussion and public competitions, the Municipality of Gusinje made available on its website only data on competitions for awarding funds to civil society organizations and their results (1 + 1 points). There are no data on public discussions during 2019, reports from public discussions containing data on proposals with reasons for their acceptance or rejection, or data on media competitions or allocated funds for media in 2019.

Overall score of the
Municipality of Gusinje

19
points

HERCEG NOVI

www.hercegnovi.me

The Municipality of Herceg Novi with a total of 47 points, according to the defined indicators of this research, is ranked high among medium transparent municipalities.

The distribution of points across categories is as follows: Municipal Assembly - 5; budget - 7; fight against corruption - 7; availability of information - 15; public procurement - 9; public discussions and public competitions - 4.

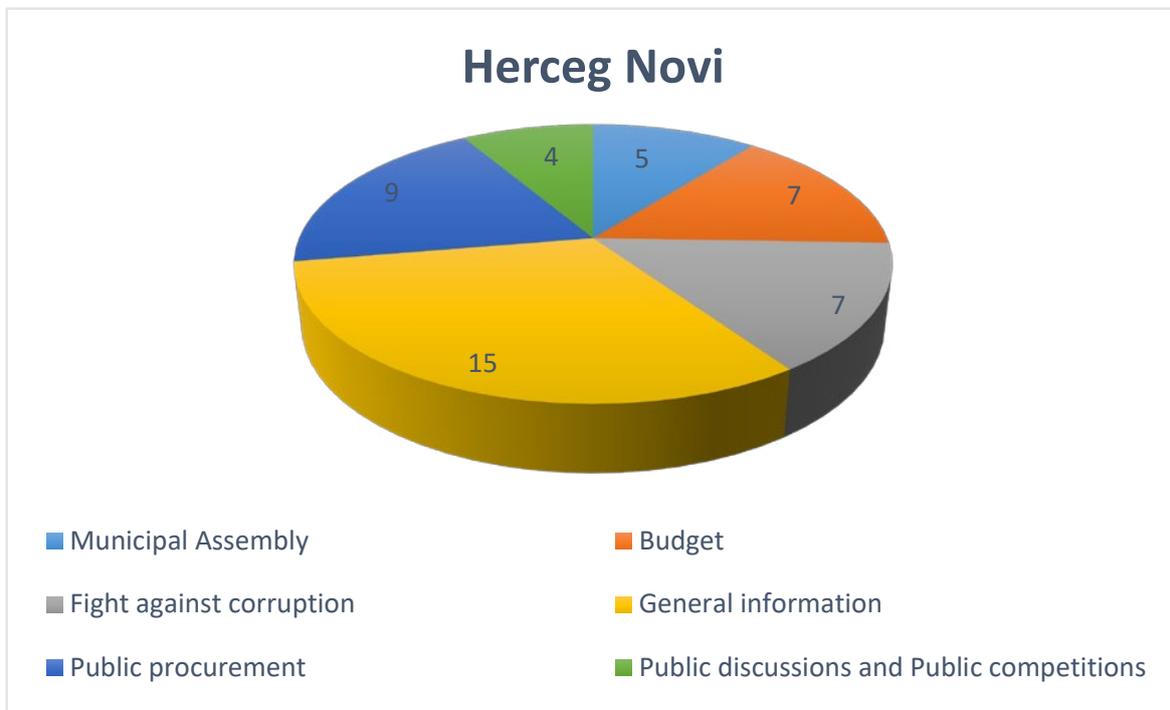


Chart 17: Overview of marks as per area in Municipality of Herceg Novi

The Herceg Novi Municipality website is visually appealing, clear and user-friendly. Some areas are well covered in content, while some lack a significant amount of information that is important for public policy monitoring in this municipality.

• MUNICIPAL ASSEMBLY

Decisions adopted by the Municipal Assembly during 2019 (2 points), followed by a list of councillors (2 points) and information on direct broadcast via media (1 point) are available on the Herceg Novi Municipality website.

However, the results of voting from the sessions of the Municipal Assembly are not available, information on how the councillors voted individually, the amendments to the proposals and explanations that followed them, the minutes from the meetings of the Municipal Assembly, the contact details of the councillors, as well as the agenda of the Municipal Assembly session.

• BUDGET

In the part of budget management, the Budget for 2019 (2 points) is available on the website of Herceg Novi Municipality, followed by reports on the execution of that Budget (2 points), the Public Call for Public Discussion on the Budget for 2019 (1 point) and information that a public discussion was conducted (2 points).

On the other hand, there is no explanation of the Budget for 2019, nor is that Budget in a mechanically readable format, guide for citizens, Report on Public Discussion on the Budget for 2019, information on whether the Final Account of the Budget for 2019 was discussed, as well as the 2020 Budget.

• FIGHT AGAINST CORRUPTION

The Municipality of Herceg Novi has on its website the possibility for citizens to report irregularities and illegalities in the form of 48h system (2 points), Code of Ethics for Employees (2 points) and information on salaries of officials (1 point). The president has submitted the property report for 2019 (2 points).

There is no detailed information available on the mechanisms for reporting corruption to the municipality, there is no possibility that irregularities or illegalities can be reported anonymously, and there are no reports or information on the number of filed and processed complaints for 2019. In addition, the website does not have an Integrity Plan, a Local Anti-Corruption Plan, nor reports on their implementation, and there is no information on the salaries of officials or who has been appointed to act on whistle-blower reports.

• AVAILABILITY OF INFORMATION

In the area of general availability of information/documents, the highest degree of transparency was noted. The Municipality of Herceg Novi has clearly indicated working hours of the municipality (2 points), contact information of the President (2 points) and of the presidents of local communities (2 points), list of municipal inspections, i.e. the Utilities Inspection (1 point), data on the number of employees in the municipality (1 point), Free Access to Information Guide (2 points), overview of approved requests filed under the Law on Free Access to Information (2 points), and contact of a person responsible for answering such requests (2 points).

The website does not have information on handling the complaints, petitions and objections, defined office hours during which the president of municipality receives the citizens, the Rulebook on Internal Organization and Job Systematization, data on the number of employees in public institutions and enterprises, the Municipal Strategic Development Plan, the Annual Work Plan of the municipality and the Local Government Work Report.

- **PUBLIC PROCUREMENT**

The Herceg Novi Municipality website has a section dedicated to public procurement (1 point), information on public procurement competitions (2 points), conducted public procurement (2 points), selected bidders (2 points), as well as a Public Procurement Plan for 2019 (2 points). Only the Report on the Implementation of the Public Procurement Plan for 2019 has not been published.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

The website has data on public discussions that do not include those for the 2019 Budget (2 points), public competitions for allocation of funds to NGO during 2019 (1 point) and results thereof (1 point). There is no information on stakeholder proposals during public discussions, the reasons for accepting or rejecting these proposals, nor on the competitions for allocation funds to media and the results of those competitions.

Overall score of Municipality
of Herceg Novi

47
points

KOLAŠIN

www.opstinakolasin.me

Kolašin Municipality received 45 points out of the total of 100 points, which ranks it high among medium transparent municipalities.

The distribution of points per category is as follows: Municipal Assembly - 6; budget - 5; fight against corruption - 12; availability of information - 16; public procurement - 3; public discussions and public competitions - 3.

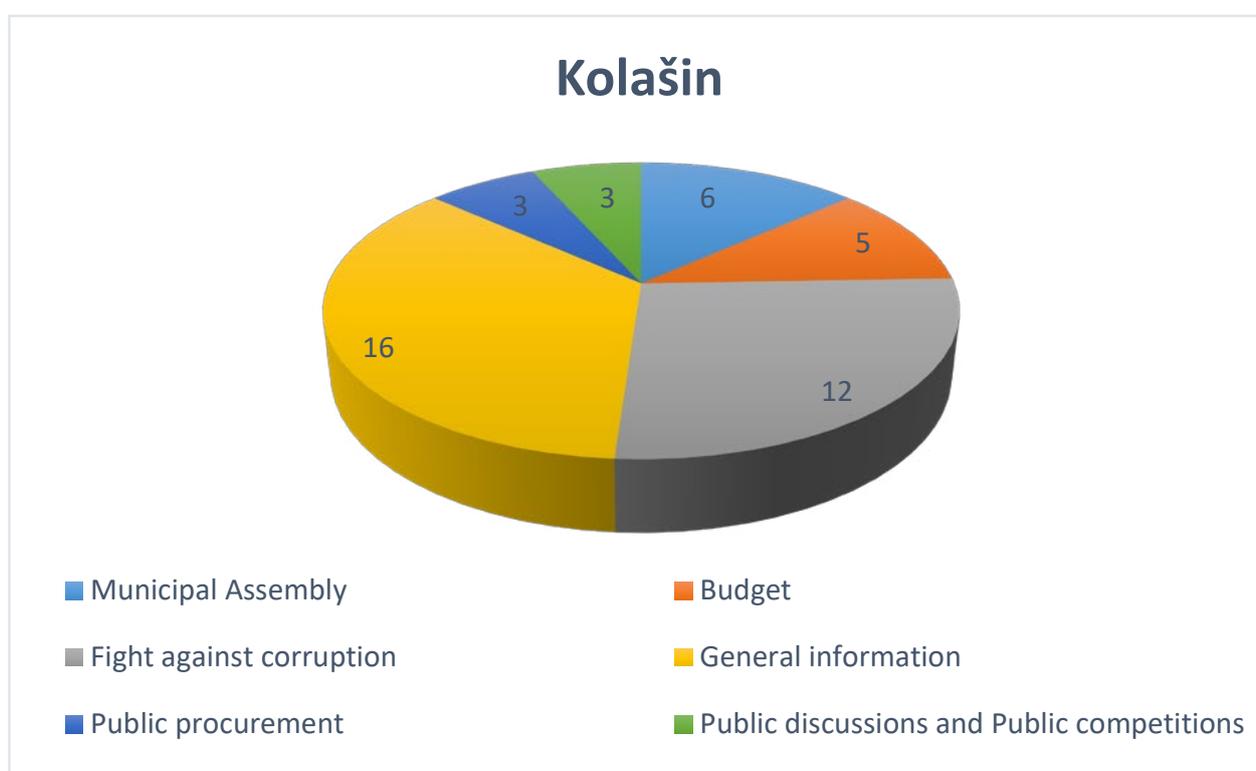


Chart 18: Overview of marks as per area in Municipality of Kolašin

It should be noted that when completing this survey, it was identified that the Municipality of Kolašin had set up a new website, which appears to be significantly more advanced than the previous one, but that website was not subject to analysis because the transparency assessment relates to 2019.

• MUNICIPAL ASSEMBLY

In this section, of the 10 required types of information/documents, three were available - information on decisions adopted by the Municipal Assembly in 2019 (2 points), agenda for the next session (2 points) and list of councillors (2 points).

However, there was no published data on the results of voting from the 2019 Municipal Assembly sessions, or how councillors voted individually. Also, there are no

amendments available to the acts discussed at the sessions, nor the explanations for those amendments. Finally, there are no minutes from sessions, councillor contacts, or information on whether sessions are broadcasted directly through the media.

• BUDGET

The Budget of 2019 (2 points), the citizens' guide (1 point), the Public Call for a Public Discussion on the Budget (1 point) and the 2020 Budget (1 point) are available on the Kolašin Municipality website.

There is no explanation of the Budget for 2019, nor is the Budget available in machine-readable form. Also, there is no 2019 Budget Execution Report, data on whether the public discussion on the Budget was conducted, nor a 2019 Budget Final Account.

• FIGHT AGAINST CORRUPTION

The Kolašin Municipality website contains information on mechanisms for reporting corruption (2 points), and there is an option to report irregularities or illegalities of local services (2 points), as well as the possibility to do so anonymously (1 point). Also, an Integrity Plan (2 points), information on salary of public officials (1 point) and the name of the person appointed to act on whistle-blower reports (2 points) are available. In addition, the president has submitted the 2019 property report (2 points).

No report or information is available on the number of filed and processed complaints for 2019, the Code of Ethics for Employees, the Report on the Implementation of the Integrity Plan, the Local Anti-Corruption Plan, the report on its implementation, nor information on the salaries of employees.

• AVAILABILITY OF INFORMATION

In the section of general information, the working hours of the municipality (2 points) are clearly indicated, as well as the contacts of the President of Municipality (2 points), those of presidents of local communities (2 points), the list of municipal inspections except the Utilities Police and the Utilities Inspection (1 point), and the Rulebook on Internal Organization and Jobs Systematization (1 point), Annual Work Plan of Kolašin Municipality (1 point), number of employees in the municipality (1 point), Guide to access to information (2 points), overview of approved requests filed under the Law on Free Access to Information (2 points) and contact of a person answering such requests (2 points) are all available.

There is no information on the website regarding the handling of complaints, petitions and objections, as well as the office hours during which the president of municipality receives the citizens. Also, there is no Municipal Strategic Development Plan, a report on the work of the municipality, or the number of employees in public enterprises and institutions.

• PUBLIC PROCUREMENT

On the website of the Municipality of Kolašin there is a public procurement section (1 point) and a Public Procurement Plan for 2019 (2 points). However, public procurement tenders, data on conducted public procurement and selected bidders, as well as the Report on the implementation of the Public Procurement Plan for 2019 are not available on the website.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

The website has data on conducted public discussions that do not include those for the 2019 Budget (2 points). Public tenders for awarding funds to civil society organizations during 2019 (1 point) have also been published.

There is no information available on stakeholder proposals, reasons for accepting or rejecting these proposals, the results of competitions for funding for civil society organizations, as well as media competitions on any basis and the results of those competitions.

Overall score of the
Municipality of Kolašin

45
points

KOTOR

www.kotor.me

According to the defined indicators of this research, the municipality of Kotor is in the category of the most transparent Montenegrin municipalities with a total of 53 points.

The distribution of points per category is as follows: Municipal Assembly - 7; budget - 6; fight against corruption - 10; availability of information - 14; public procurement - 9; public discussions and public competitions - 7.

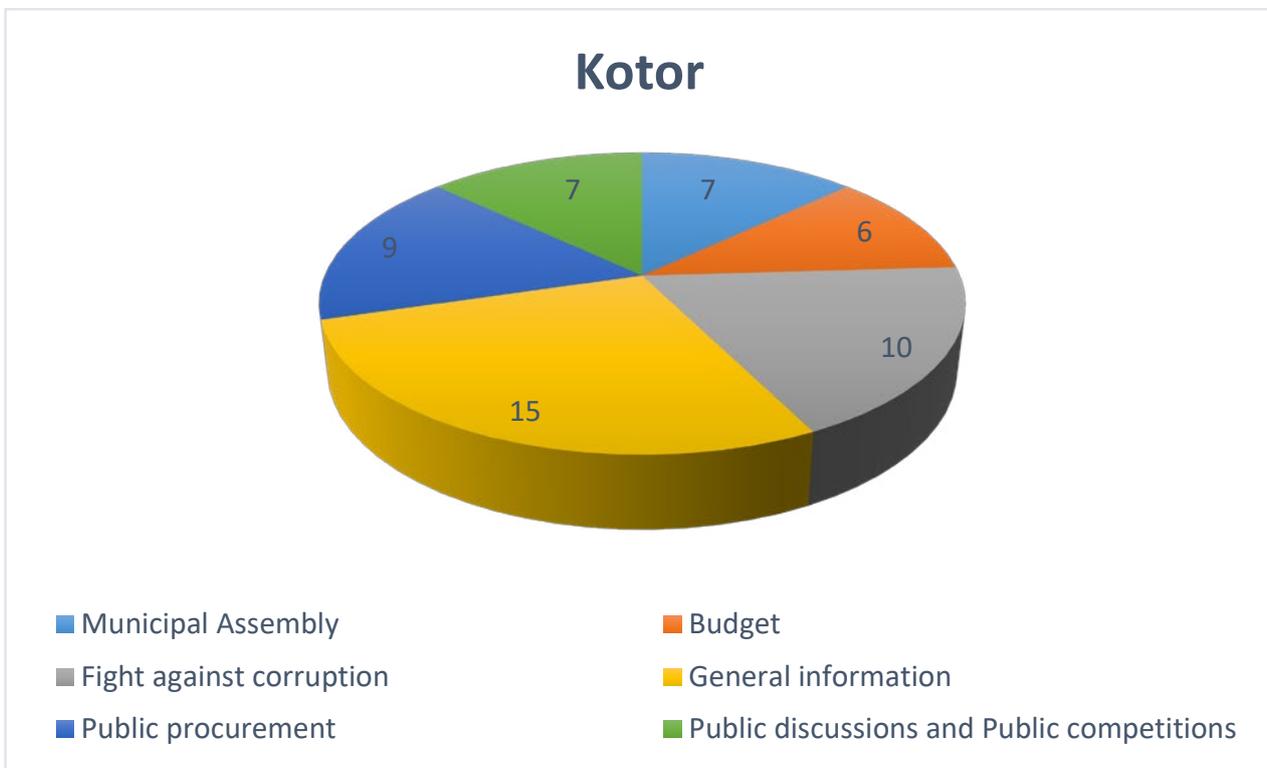


Chart 19: Overview of marks as per area in Municipality of Kotor

The municipality of Kotor has also recorded a solid level of transparency in previous researches on the transparency of Montenegrin municipalities conducted by the CCE, and this trend has continued. However, there is space for improvement in the availability of documents/information that enable adequate monitoring of public policies in this municipality.

• MUNICIPAL ASSEMBLY

The Kotor Municipality website provides information on decisions adopted by the Municipal Assembly in 2019 (2 points), the agenda of the next session (2 points), the list of councillors (2 points), as well as information on the direct broadcast of municipal assembly sessions via local media (1 point).

However, there is no information on the voting results from the 2019 Municipal Assembly sessions, or how the councillors voted individually. Also, there are no proposed amendments available to the acts that have been discussed at the sessions, nor the explanation for those amendments. Finally, there are no minutes from the sessions of the Municipal Assembly, nor the contacts of councillors.

• BUDGET

In the section pertaining to budgetary issues, the Budget for 2019 (2 points), the Public Call for Public Discussion on the Budget for 2019 (1 point), information that a public discussion on the Budget for 2019 was held (2 points), as well as the 2020 Budget (1 point) are available on website of Municipality of Kotor.

There is no explanation of the Budget for 2019, the Budget in a machine-readable form, nor the report on the execution of the Budget. In addition, no citizens' guide, Public Discussion Report or the 2019 Final Account are available.

• FIGHT AGAINST CORRUPTION

The Municipality of Kotor has made available six of the required 13 types of information/documents in the part of fight against corruption. Significantly, this municipality has the option on the website for citizens to report irregularities in work, i.e. illegalities, through the system 48h (2 points), and the possibility to submit a report anonymously as well (1 point). Also, the Code of Ethics for Employees is available (2 points), as well as the Integrity Plan (2 points), information on the salaries of officials (1 point), and the president of municipality has submitted a property report for 2019 (2 points).

The website does not contain data on mechanisms for reporting corruption to the municipality, report or information on the number of submitted and processed complaints for 2019, Report on the implementation of the Integrity Plan, Local Anti-Corruption Plan and report on its implementation, information on salaries of officials and contact of a person who was appointed to act on whistle-blower reports.

• AVAILABILITY OF INFORMATION

In the part of general information, on the website are available the following: data on working hours of the municipality (1 point), lists of municipal inspections (2 points), data on handling of complaints, petitions and objections through the 48h system (1 point), contacts of the President of Municipality (2 points) and of presidents of local communities (2 points). In addition, there is a list of employees of the municipality (1 point), as well as a Guide to free access to information (1 point) with an overview of approved requests filed under the Law on Free Access to Information (2 points) and a contact of a person answering such requests (2 points).

Office hours during which the president of the municipality receives the citizens are not available, and there is no Rulebook on Internal Organization and Jobs

Systematization in the municipality, the Municipal Strategic Development Plan, the Annual Work Plan and the report on the work of the municipality, as well as data on the number of employees of public institutions and enterprises.

- **PUBLIC PROCUREMENT**

On the website of the Municipality of Kotor, there is a section for public procurement (1 point) and data on the public procurement competitions (2 points), conducted public procurement (2 points), selected bidders (2 points), as well as the Public Procurement Plan for 2019 (2 points). However, the Report on the implementation of the Public Procurement Plan for 2019 is not available on the website.

- **PUBLIC DISCUSSIONS AND COMPETITIONS**

The website contains data on conducted public discussions that do not include those for the Budget for 2019 (2 points), reports on public discussions containing proposals from stakeholders (2 points), the results of the competitions for the allocation of funds to civil society organizations and the media (1 + 1) points), as well as public competitions for the allocation of funds to civil society organizations during 2019 (1 point). No information is available on the reasons for accepting or rejecting the proposals at public discussions, as well as the competitions for awarding funds to the media.

Overall score of the
Municipality of Kotor



MOJKOVAC

www.mojkovac.me

According to the indicators of this research, the municipality of Mojkovac is positioned high in the category of medium transparent Montenegrin municipalities with 45.5 points.

The distribution of points per category is as follows: Municipal Assembly - 6; budget - 10; fight against corruption - 7; availability of information - 7; public procurement - 9; public discussions and public competitions - 6.5.

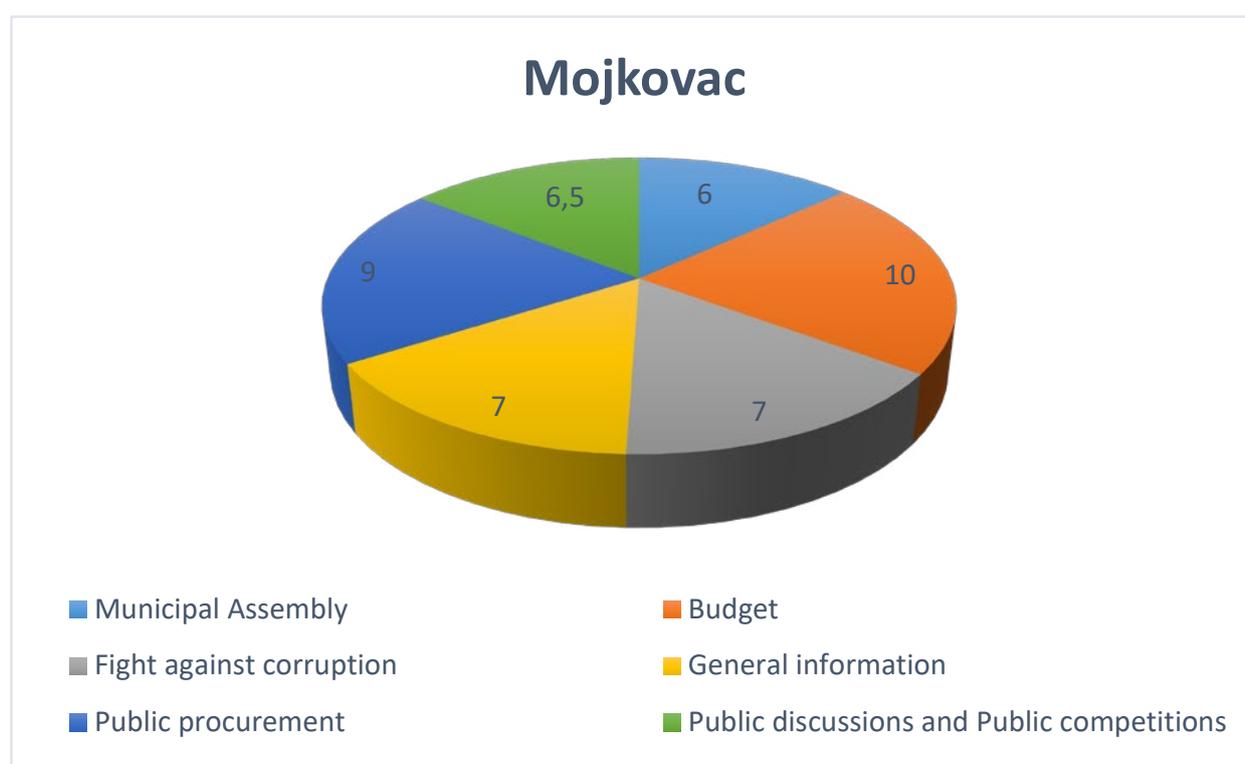


Chart 20: Overview of marks as per area in Municipality of Mojkovac

The website of the municipality of Mojkovac has been visually innovated in relation to the previous period, it is clear and user-oriented. However, improvements are needed in the content part, in all analysed areas.

• MUNICIPAL ASSEMBLY

Out of a total of 10 types of information/documents required by research in this part, three pieces of information are available on the website of the Municipality of Mojkovac - decisions adopted by the Municipal Assembly during 2019 (2 points), agenda of the next session (2 points) and list of councillors (2 points).

There are no published results of voting from the sessions of the Municipal Assembly during 2019, nor how the councillors voted individually. Also, there are no amendments

to the discussed acts, the explanations of these amendments, the minutes from the sessions of the Municipal Assembly, the contacts of councillors, or information whether the sessions are broadcasted directly via media.

• BUDGET

The Municipality of Mojkovac made available the Budget for 2019 (2 points), the Report on Budget Execution for 2019 (2 points), the Public Call for a Public Discussion on the Budget for 2019 (1 point), information that a public discussion on the Budget was held (2 points), Report on that public discussion (2 points) as well as the Budget for 2020 (1 point).

However, the explanation of the Budget for 2019, the Budget in machine-readable form, the guide for citizens, as well as the Final Account of the Budget for 2019 are not available.

• FIGHT AGAINST CORRUPTION

The Municipality of Mojkovac has made available four of the 13 required types of information/documents in the part of fight against corruption. These include the Code of Ethics for Employees (2 points), Integrity Plan (2 points), published contact of a person in charge of whistle-blower reporting (2 points), and the property report of president of the municipality for 2019 (2 points).

The website does not contain data on mechanisms for reporting corruption to the municipality of Mojkovac, the option for citizens to report irregularities or illegalities of local services, a report or information on the number of submitted and processed complaints for 2019, Report on the implementation of the Integrity Plan, Local Anti-Corruption Plan and a report on its implementation, nor information on the salaries of public officials and employees.

• AVAILABILITY OF INFORMATION

When it comes to the availability of municipal information, the website includes the contact of the President of Municipality (2 points), the Strategic Development Plan of the Municipality of Mojkovac (2 points), the list of employees in the municipality (1 point) and the contact of a person responsible for answering requests for free access to information (2 points).

However, data on the working hours of the municipality, lists of municipal inspections, contacts of the presidents of local communities are not available, nor are office hours during which the president of the municipality receives the citizens specified. Also, there is no Guide on Free Access to Information on the website, overview of approved requests filed in accordance with the Law on Free Access to Information, Rulebook on Internal Organization and Jobs Systematization in the Municipality, Annual Work Plan and Report on the Work of the Municipality, as well as data on the number of employees in public institutions and enterprises.

- **PUBLIC PROCUREMENT**

On the website of the Municipality of Mojkovac, there is a section for public procurement (1 point) and it has data on the public procurement tender (2 points), with data on conducted public procurement (2 points) and the selected bidder (2 points), as well as the Public Procurement Plan for 2019 (2 points). There is no Report on the implementation of the Public Procurement Plan for 2019 on the website.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

There is data on the website on conducted public discussions that do not include those for the 2019 Budget (2 points), public discussions' reports containing stakeholder proposals (but only for the last few public discussions) which has resulted in lower number of points (0.5 points). The reports contain information on the reasons for accepting or rejecting the proposals (2 points), and the competitions for funding and the results of the competitions for the allocation of funds to civil society organizations (1 + 1 point) have been also published. No information on allocation of funds to media is available.

Overall score of the
Municipality of Mojkovac

45.5
points

The Municipality of Nikšić is comparatively among the most transparent Montenegrin municipalities with a total of 54 points.

The distribution of points across categories is as follows: Municipal Assembly - 9; budget - 5; fight against corruption - 9; availability of information - 14; public procurement - 9; public discussions and public competitions - 8.

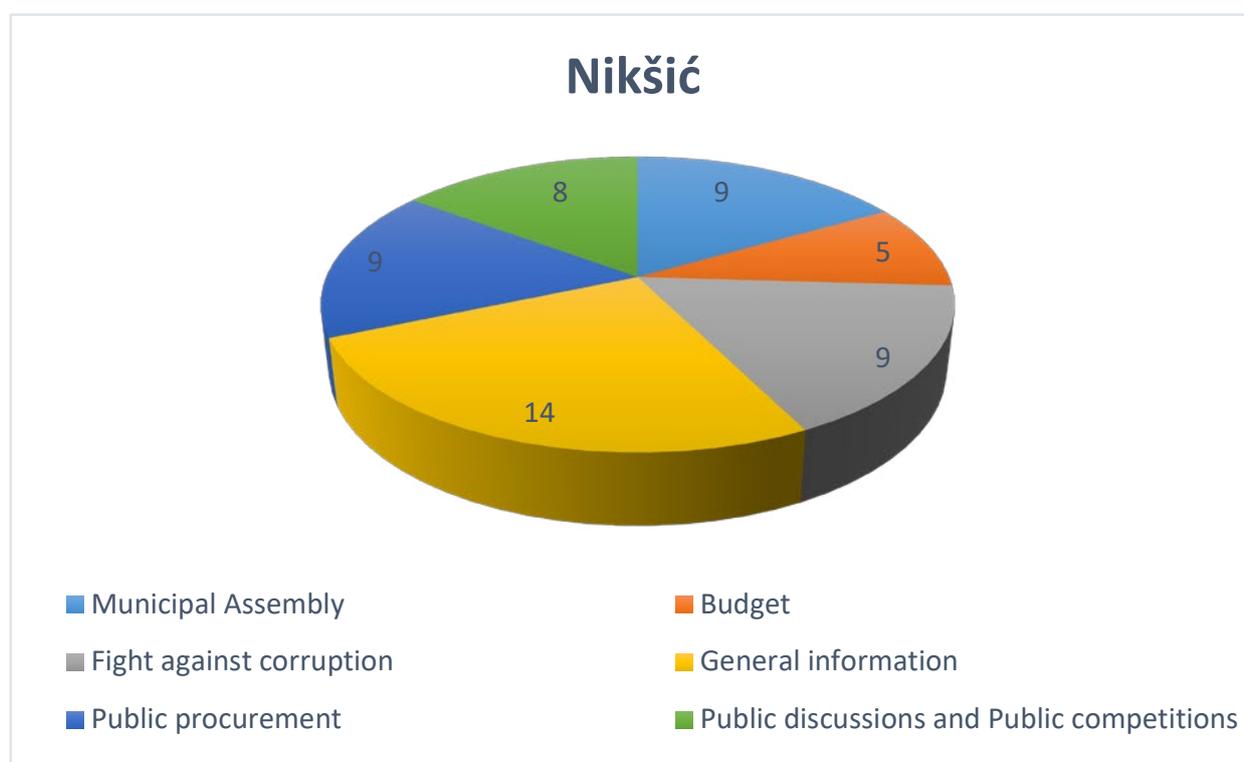


Chart 21: Overview of marks as per area in Municipality of Nikšić

The Municipality of Nikšić is the third-ranked municipality, according to the parameters set by this research, but the fact that the sum of points carries a little more than half of the total indicates the need to improve the content in terms of availability of documents/information that can contribute to assessment of public policies conducted by the local self-government.

• MUNICIPAL ASSEMBLY

In the part of required types of information/documents related to the work of the Municipal Assembly, the website contains decisions adopted by the Municipal Assembly in 2019 (2 points), results of voting from the sessions (1 point), agenda of the next session (2 points), list of councillors (2 points), minutes from the sessions (1 point), as well as information on live broadcasts of the sessions of the Municipal Assembly (1 point).

The results of the individual vote of councillors, proposed amendments to the draft

acts discussed at the sessions, explanations of these amendments, and contacts of councillors are not published.

• BUDGET

Of the 10 required types of information/documents related to budgetary management, four are available - Budget for 2019 (2 points), Budget explanation for 2019 (1 point), Budget Execution Report (2 points) and Budget for 2020 (1 point).

On the other hand, the Budget in a machine-readable format is not available, nor are the guide for citizens for the Budget, the Public Call for Public Discussion on the Budget for 2019, information on whether that public discussion was held, the report from the public discussion, and the Final Account of the Budget for 2019.

• FIGHT AGAINST CORRUPTION

The Code of Ethics for Employees (2 points), Integrity Plan (2 points), Local Anti-Corruption Plan (2 points), information on salaries of officials (1 point) are available on the website of the Municipality of Nikšić, and the President of the Municipality has submitted the property report for 2019 which is available on the website of the Agency for Prevention of Corruption (2 points).

There is no data on the mechanisms for reporting corruption on the website, there is no option for citizens to report irregularities or illegalities, and consequently there are no possibilities for anonymous reporting. Also, there are no reports or information on the number of filed and processed complaints for 2019, the Report on Implementation of the Integrity Plan and the Local Anti-Corruption Plan, information on the salaries of public officials and employees, as well as the contact of the person appointed to act on whistle-blowers reports.

• AVAILABILITY OF INFORMATION

Among the general information, lists of municipal inspections are available on the website of the Municipality of Nikšić with contacts of the Inspection Affairs Service (2 points), contact of the President of Municipality (2 points), Municipal Strategic Development Plan (2 points), Annual Work Plan (1 point), data on the number of employees in the municipality (1 point), Guide to Access to Information (2 points), overview of approved requests filed pursuant to the Law on Free Access to Information (2 points) and contact of a person responsible for answering such requests (2 points).

However, data on the working hours of the municipality are not available, nor are the office hours during which the president of the municipality receives the citizens defined, there is no information on the handling of complaints, petitions and objections, the Rulebook on Internal Organization and Jobs Systematization in the municipality, the Report on the Work of Municipality for 2019 and data on employees in public institutions and enterprises.

- **PUBLIC PROCUREMENT**

On the website of the Municipality of Nikšić there is a section for public procurement (1 point) and it has data on the public procurement tender (2 points), with information on conducted public procurement (2 points) and the selected bidder (2 points), as well as a Public Procurement Plan for 2019 (2 points). The Report on implementation of the Public Procurement Plan for 2019 has not been made available on the website.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

The website of the Municipality of Nikšić has data on conducted public discussions that do not include those for the Budget for 2019 (2 points), reports on these public discussions (2 points), which contain information on the reasons for accepting or rejecting proposals (2 points). Also, the competition for funding and the results of the competition for the allocation of funds to civil society organizations (1 + 1 point) are published as well. No data is available for investments in media.

Overall score of the
Municipality of Nikšić

54
points

PETNJICA

www.petnjica.co.me

The Municipality of Petnjica with a total of 33 points, according to the indicators of this research, represents one of the medium transparent municipalities.

The distribution of points across categories is as follows: Municipal Assembly 4; budget - 7; fight against corruption - 5; availability of information - 6; public procurement - 7; public discussions and public competitions - 4.

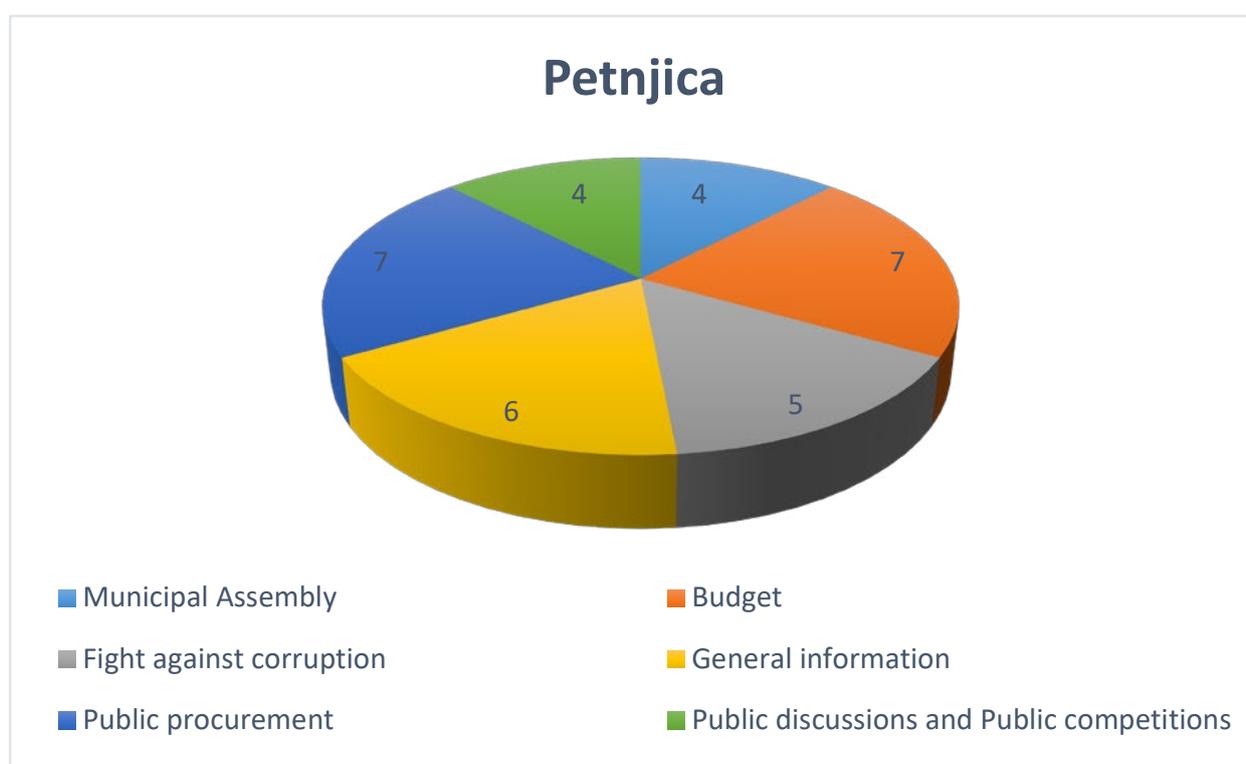


Chart 22: Overview of marks as per area in Municipality of Petnjica

One of the youngest Montenegrin municipalities, Petnjica, has a simple and clear website, but still insufficient in terms of content, especially in the part of information and documents that is important for monitoring the effectiveness of public policy implementation by local self-government.

• MUNICIPAL ASSEMBLY

Of 10 documents required in the part of functioning of the Municipal Assembly, only two were available on the Petnjica Municipality website - decisions adopted by the Municipal Assembly in 2019 (2 points) and the list of councillors (2 points).

It was impossible to find the results of voting from the 2019 Municipal Assembly sessions on the website, and how councillors voted individually at the 2019 sessions, proposed

amendments to the discussed acts or explanations of those amendments, agenda of the next session, minutes of the Municipal Assembly sessions, councillors' contacts, as well as information on whether sessions are broadcasted via any of the local media.

• BUDGET

In the part of budgetary issues, out of a total of 10 required documents, four are available on the website of this municipality - Budget for 2019 (2 points), Report on Budget Execution (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point) and information that a public discussion on the Budget for 2019 was held (2 points).

The website did not provide an explanation of the 2019 Budget or that Budget in a mechanically readable format (.xls or -xlsx) but in PDF. Also, there was no guide for citizens, information on whether the Final Account of the Budget for 2019 was discussed, the Report on the conducted public discussions, or the Budget for 2020.

• FIGHT AGAINST CORRUPTION

Regarding the fight against corruption, of the 14 required types of information/documents, three are available - the Code of Ethics for Employees (2 points), information on the salaries of public officials (1 point) and the property report of the President of Municipality for 2019 (2 points).

The website does not contain information on mechanisms for reporting corruption or the possibility for citizens to report irregularities or illegalities, and therefore no possibility of anonymous reporting. In addition, there is no report or information on the number of submitted and processed complaints for 2019, the Integrity Plan for the period 2018-2020, the Local Anti-Corruption Plan or reports on their implementation. In addition, information on the salaries of employees and contacts of the person appointed to act on whistle-blowers reports are not published.

• AVAILABILITY OF INFORMATION

Of the 15 types of information/documents that we searched for, only three can be found on the Petnjica Municipality website - contact of the President of Municipality (2 points), overview of approved requests filed under the Law on Free Access to Information (2 points) and contact of a person answering such requests (2 points).

Data on the working hours of the local self-government are not available, nor are office hours during which the president of the municipality receives the citizens specified. There is no list of municipal inspections, data on handling of upon complaints, petitions and objections, data on presidents of local communities, Annual Work Plan of the municipality, Report on the work of the municipality for 2019, data on the number of employees in public institutions and enterprises, Rulebook on Internal Organization and Jobs Systematization, the Strategic Municipal Development Plan and data on the number of employees in the municipality. There is an item of the

Guide to Access to Information on the website but there is no information when one opens this option.

- **PUBLIC PROCUREMENT**

On the Petnjica Municipality website there is a section dedicated to public procurement (1 point) with information on published tenders for public procurement (2 points), conducted public procurement in 2019 (2 points) and selected bidder (2 points). The Public Procurement Plan for 2019 and the Report on the Implementation of the Public Procurement Plan for 2019 have not been published on the website.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

There are data on public discussions conducted in 2019 except the Budget (2 points), and competitions for the allocation of funds to civil society organizations for 2019 (1 point) as well as decisions on the manner of their distribution (1 point) are published on the website as well. However, reports on public discussions with data on stakeholder proposals and reasons for acceptance or rejection have not been published, and data on investments in media during 2019 are also not available.

Overall score of the
Municipality of Petnjica

33
points

PLAV

www.plav.me

According to the parameters defined in this research, Plav Municipality is ranked among the most non-transparent municipalities in Montenegro with a total of 25 points.

The distribution of points per category is as follows: Municipal Assembly - 4; budget - 8; fight against corruption - 3; availability of information - 4; public procurement - 3; public discussion and public competitions - 3.

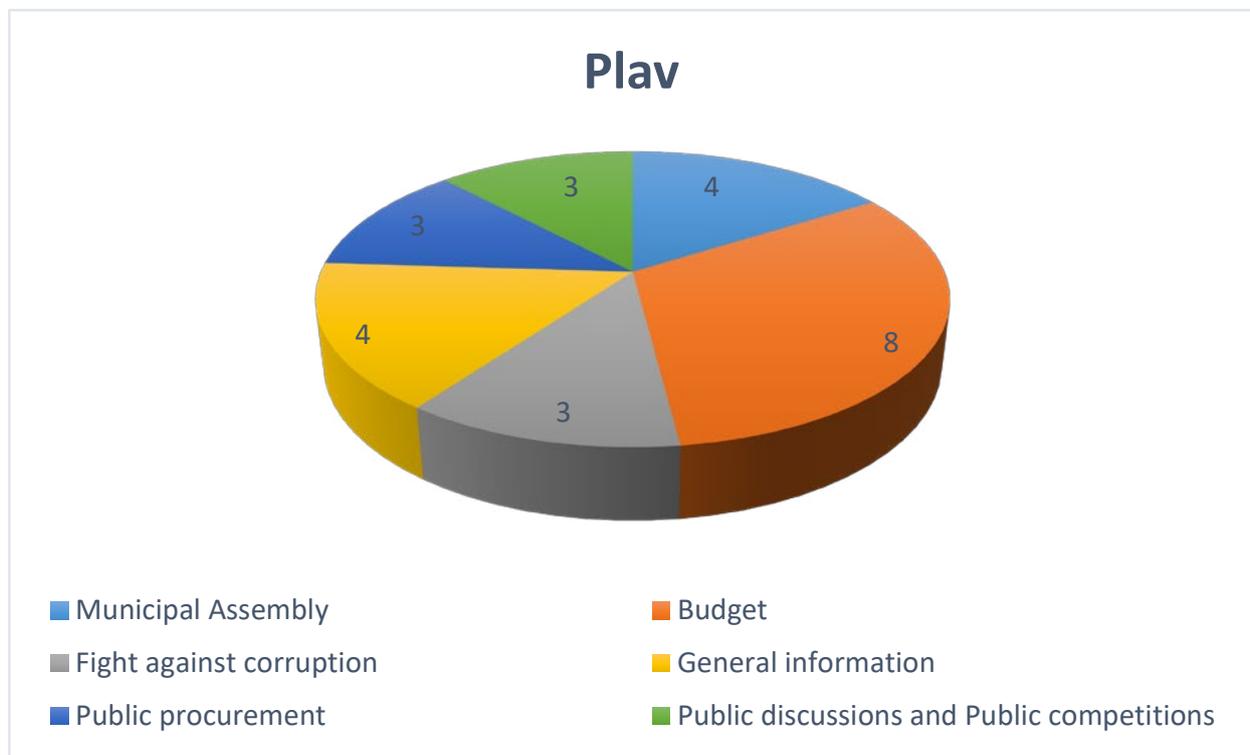


Chart 23: Overview of marks as per area in Municipality of Plav

Although the website of the municipality of Plav is visually appealing and simple for users, there are serious shortcomings in the content when certain categories are checked. Therefore, improvements are needed to facilitate access of citizens in the use of the service, as well as to effectively monitor the work of local self-government.

• MUNICIPAL ASSEMBLY

Out of a total of 10 required documents related to the Municipal Assembly, only two are available - the agenda of the next session of the Municipal Assembly (2 points) and the list of councillors (2 points).

There are no results of the decisions of the Municipal Assembly during 2019, voting from the sessions of the Municipal Assembly during 2019, or how the councillors voted individually. In addition, there are no amendments to the draft acts discussed at the sessions, as well as the explanations of those amendments. The contact details of councillors, minutes from the sessions or information on whether the sessions are broadcasted directly through one of the local media are not available either.

• BUDGET

In this part, out of 10 required types information/documents on the website, there is the Budget for 2019 (2 points), Public Call for Public Discussion on the Budget (1 point), information that a public discussion on the Budget for 2019 was held (2 points), Report on the public discussion on the Budget for 2019 (2 points) and the Budget for 2020 (1 point).

However, the website does not contain: the explanation of the Budget, the Budget in a machine-readable format, reports on the execution of the Budget, the guide for citizens for the Budget or the Final Account of the Budget for 2019.

• FIGHT AGAINST CORRUPTION

In terms of the fight against corruption, available information is scarce as well. Out of 14 required pieces of information/documents, only three can be found - the option on the website for citizens to report irregularities in the work of the municipality (2 points), the Integrity Plan (1 point) and the property report of the president of the municipality for 2019 (2 points).

There is no information on the website about the mechanisms for reporting corruption or the possibility of anonymous reporting. In addition, there is no report or information on the number of submitted and processed complaints for 2019, the Integrity Plan and the Local Anti-Corruption Plan, nor reports on their implementation. Also, no information was published on salaries of public officials and employees, nor the contacts of the person appointed to act on whistle-blowers reports.

• AVAILABILITY OF INFORMATION

When it comes to the availability of general information, the website of the municipality of Plav contains a list of municipal inspections in the part of the Utilities Inspection (1 point), contact of President of the Municipality (2 points) and of presidents of local communities (2 points), Municipal Work Plan (1 point) and overview of approved requests filed in accordance with the Law on Free Access to Information (1 point).

On the other hand, there are far more pieces of information that are not publicly available. This includes data on the working hours of the municipality, handling of upon complaints, petitions and objections, information on office hours during which the president of municipality receives the citizens, Rulebook on Internal Organization

and Jobs Systematization, Strategic Municipal Development Plan, Report on the work of the municipality, information on the number of employees in the municipality and its public institutions and enterprises, the Guide for Free Access to Information and the contact of a person responsible for answering such requests.

- **PUBLIC PROCUREMENT**

On the website of the municipality of Plav, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points), conducted public procurement in 2019 (2 points) and the selected bidder (2 points). The Public Procurement Plan for 2019 is available as well (2 points), but not the Report on the implementation of the Public Procurement Plan for 2019.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In the part of public discussions and public competitions, the Municipality of Plav published data on conducted public discussions except the one on the Budget (2 points), as well as data on proposals of stakeholders at public discussions (2 points), and reasons for their acceptance or rejection (2 points). The website of the municipality of Plav does not contain announcements about competitions for the allocation of funds to civil society organizations and the media for 2019, as well as about the manner of their distribution.

Overall score of the
Municipality of Plav

25
points

PLJEVLJA

www.pljevlja.me

The municipality of Pljevlja, with 43 out of a possible 100 points, is comparatively positioned among medium transparent municipalities.

The distribution of points across categories is as follows: Municipal Assembly 11; budget - 8; fight against corruption - 4; availability of information - 9; public procurement - 7; public discussions and public competitions - 4.

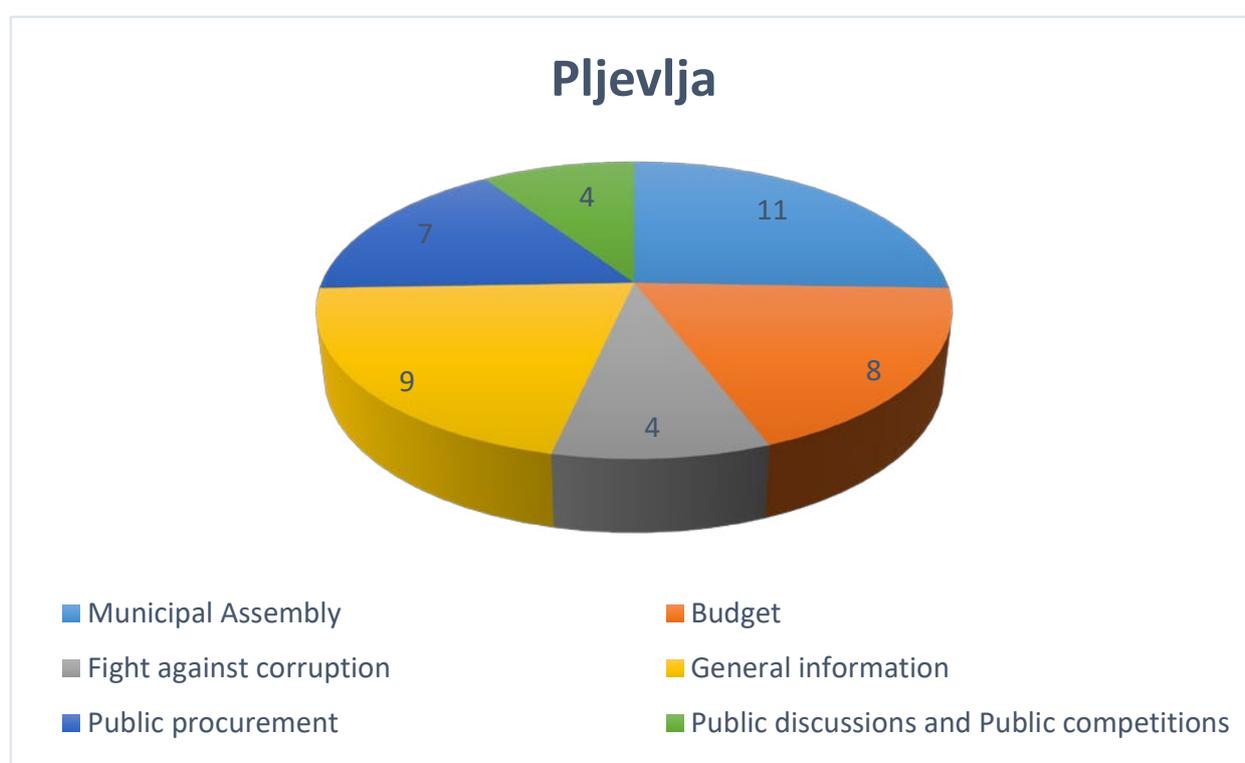


Chart 24: Overview of marks as per area in Municipality of Pljevlja

The website of the municipality of Pljevlja is clear, with plenty of special categories and is user-friendly in a technical sense, but that is not accompanied by the content in all aspects that are monitored according to the set indicators within this research.

• MUNICIPAL ASSEMBLY

Out of 10 required documents/types of information related to the work of the Municipal Assembly, seven are available on the website. These are the decisions adopted by the Municipal Assembly in 2019 (2 points), proposed amendments to the discussed acts, partial explanations of the amendments (1 point), agenda of the next session (2 points), list of councillors (2 points), partial minutes from sessions (1 point), as well as data on live broadcasts of sessions via one of the local media (1 point).

On the website of the municipality of Pljevlja, there are no results of voting from the sessions of the Municipal Assembly during 2019, nor how councillors voted individually and the contacts of councillors.

• BUDGET

In the section relating to the budget, out of a total of 10 required documents/types of information, five are available on the website of this municipality - Budget for 2019 (2 points), Report on budget execution (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point), information that a public discussion on the Budget for 2019 was held (2 points) and the Budget for 2020 (1).

There is no explanation of the Budget for 2019, the Report on conducted public discussion, or the Budget itself in a mechanically readable format (.xls or -xlsx). Also, there is no guide for citizens or the information on whether the Final Account of the Budget for 2019 has been discussed.

• FIGHT AGAINST CORRUPTION

Regarding the fight against corruption, poor transparency is registered, because, out of 14 required types of information/documents, only three are available - partially the Code of Ethics for Employees (1 point), information on salaries of public officials (1 point) and the property report of the President of Municipality for 2019 (2 points).

The website does not contain information on mechanisms for reporting corruption or the option for citizens to report irregularities in their work or illegalities local services, whilst the anonymous reporting is also not possible. In addition, there is no report or information on the number of submitted and processed complaints for 2019, the Integrity Plan for the period 2018-2020 and the Local Anti-Corruption Plan, nor reports on the implementation of these two plans. Finally, neither the salaries of the employees nor the contacts of the person appointed to deal with the whistle-blowers reports are published.

• AVAILABILITY OF INFORMATION

On the website of the municipality of Pljevlja, out of the required 15 types of information/documents, it is possible to find a list of municipal inspections, i.e. only Utilities Inspection (1 point), contact of the President of Municipality (2 points), Rulebook on Internal Organization and Jobs Systematization in the municipality (1 point), data on the number of employees in the municipality (1 point), Guide to Access to Information (2 points) and a contact of a person responsible for answering on requests for free access to information (2 points).

Data on the working hours of local self-government are not available, nor are data on the handling of complaints, petitions and objections. The website does not specify or define the office hours during which the president of municipality receives the citizens, there is no data on the presidents of local communities, as well as documents such as the Annual Work Plan of the municipality, the Report on the work of the

municipality for 2019, the Municipal Strategic Development Plan. There is no data on the number of employees in the municipality either, nor an overview of approved requests filed pursuant to the Law on Free Access to Information.

- **PUBLIC PROCUREMENT**

On the website of the Municipality of Pljevlja, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points), conducted public procurement in 2019 (2 points) and the selected bidder (2 points). The Public Procurement Plan for 2019 and the report on the implementation of the Public Procurement Plan for 2019 are not published.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

There is data on public discussions in 2019 except the Budget (2 points). The competitions for the allocation of funds to civil society organizations for 2019 (1 point) and decisions on distribution (1 point) have been published on the website as well. However, there are no reports on public discussions with data on stakeholder proposals and reasons for their acceptance or rejection, as well as data on competitions for funding or allocated funds for media in 2019.

Overall score of the
Municipality of Pljevlja

43
points

PLUŽINE

www.pluzine.me

The municipality of Plužine is among the most transparent Montenegrin municipalities with 52 points, out of a maximum of 100 according to the defined indicators of this research.

The distribution of points across categories is as follows: Municipal Assembly 6; budget - 10; fight against corruption - 4; availability of information - 15; public procurement - 9; public discussions and public competitions - 8.

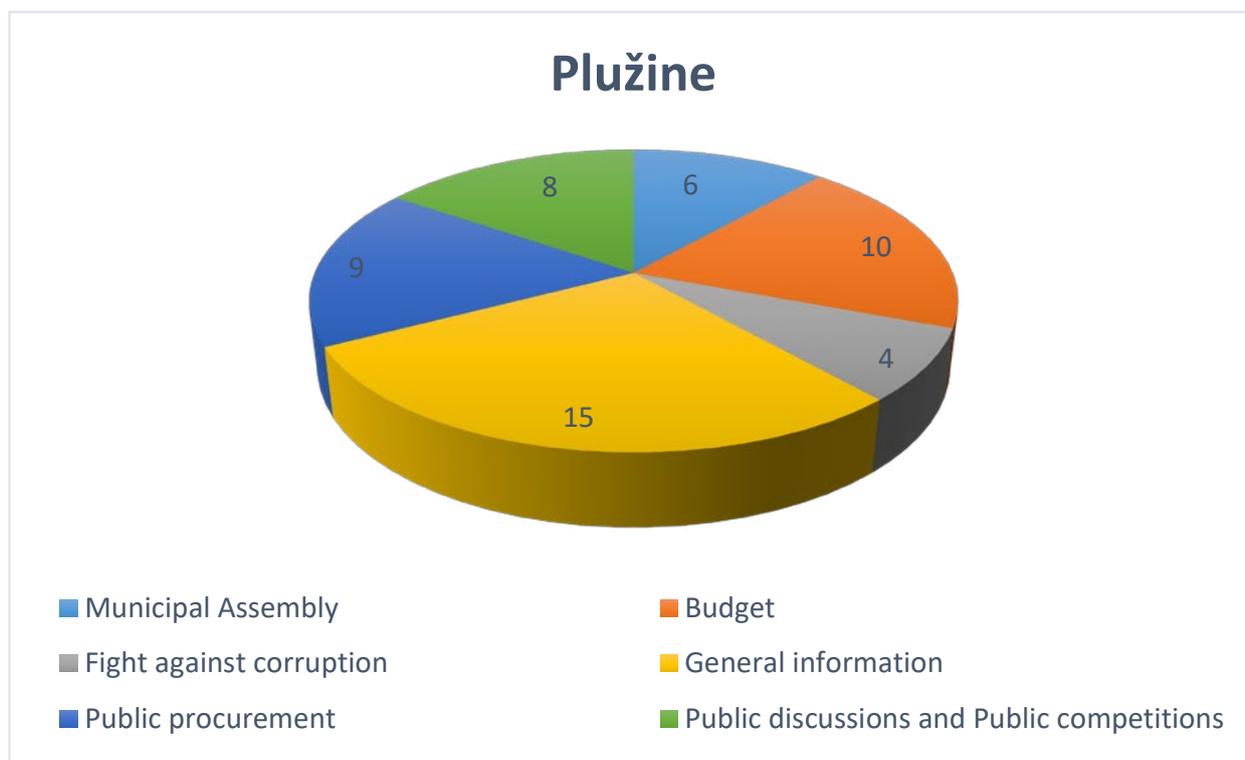


Chart 25: Overview of marks as per area in Municipality of Plužine

The website of the municipality of Plužine is not technically innovative, but it is clear and contains information that even some of the more developed municipalities that have invested more in the redesign of their websites do not have. However, the space for improvement exists especially in certain important categories, such as the area of fight against corruption.

• MUNICIPAL ASSEMBLY

On the website of the Municipality of Plužine, out of 10 required documents, three are available - decisions adopted by the Municipal Assembly in 2019 (2 points), the agenda of the next session (2 points) and the list of councillors (2 points).

However, the website does not contain proposed amendments to the discussed acts, explanations of the amendments, voting results from the sessions during 2019, as well as information on how councillors voted individually in 2019, contacts of councillors, minutes from Municipal Assembly's sessions or information whether sessions are broadcasted via one of the local media.

• BUDGET

Out of a total of 10 required documents in the area of the budget, six are available on the website of the Municipality of Plužine: Budget for 2019 (2 points), Report on Budget Execution (2 points), Public Call for Public Discussion on the Budget for 2019, information that a public discussion on the Budget for 2019 was held (2 points), Report on the public discussion on the Budget for 2019 (2 points) and the Budget for 2020 (1).

There is no explanation of the Budget on the website, and the Budget is not available in a mechanically readable format (.xls or -xlsx) but in PDF. Also, there is no guide for citizens or information on whether the Final Account of the Budget for 2019 has been discussed.

• FIGHT AGAINST CORRUPTION

Regarding the fight against corruption, out of 14 required types of information/documents, only two are available - the Code of Ethics for Employees (2 points) and the property report of the president of municipality for 2019 (2 points).

The website does not contain information on mechanisms for reporting corruption or the option for citizens to report irregularities or illegalities of their work, and consequently there is no possibility to do so anonymously. In addition, a report or information on the number of submitted and processed complaints for 2019, the Integrity Plan for the period 2018-2020 and the Local Anti-Corruption Plan, as well as reports on their implementation, are not available. Also, no information was published on the salaries of employees and public officials, nor the contact of the person appointed to act on whistle-blowers reports.

• AVAILABILITY OF INFORMATION

In the part of availability of general information, out of 15 types of information/documents that we searched for, eight are on the website: data on working hours of local self-government (2 points), list of municipal inspections in the part of Utilities Inspection (1 point), contact of the President of Municipality (2 points) and of presidents of local communities (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), data on the number of employees in the municipality (1 point), Guide for Free Access to Information (2 points), overview of approved requests filed according to the Law on Free Access to Information (2 points) and a contact of a person responsible for answering such requests (2 points).

Data on the handling of complaints, petitions and objections is not available, and the website does not specify or define office hours during which the president of municipality receives the citizens. There is also no Annual Work Plan of the municipality, Report on the work of the municipality for 2019, Municipal Strategic Development Plan, data on the number of employees in public institutions and enterprises in the municipality of Plužine.

- **PUBLIC PROCUREMENT**

On the website of the municipality of Plužine, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points), conducted public procurement in 2019 (2 points) and the selected bidder (2 points). Also, the Public Procurement Plan for 2019 is available, while the Report on the implementation of the Public Procurement Plan for 2019 has not been published.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Out of seven types of information/documents related to public discussions and public competitions, on the website of the Municipality of Plužine there is data on public discussions conducted in 2019 except the Budget (2 points), there are also reports on public discussions containing data with proposals from stakeholders (2 points), and reports on public discussions containing the reasons for accepting or rejecting these proposals (2 points). Competitions for the allocation of funds to non-governmental organizations for 2019 (1 point) and decisions on distribution (1 point) are also published on the website. There is no data on the allocated funds for the media during 2019.

Overall score of the
Municipality of Plužine

52
points

PODGORICA

www.podgorica.me

The Capital City of Podgorica, with 58 points out of a possible 100, according to the indicators of this research, is one of the two most transparent municipalities in Montenegro.

The distribution of points across categories is as follows: Municipal Assembly 9; budget - 12; fight against corruption - 5; availability of information - 17; public procurement - 7; public discussions and public competitions - 8.

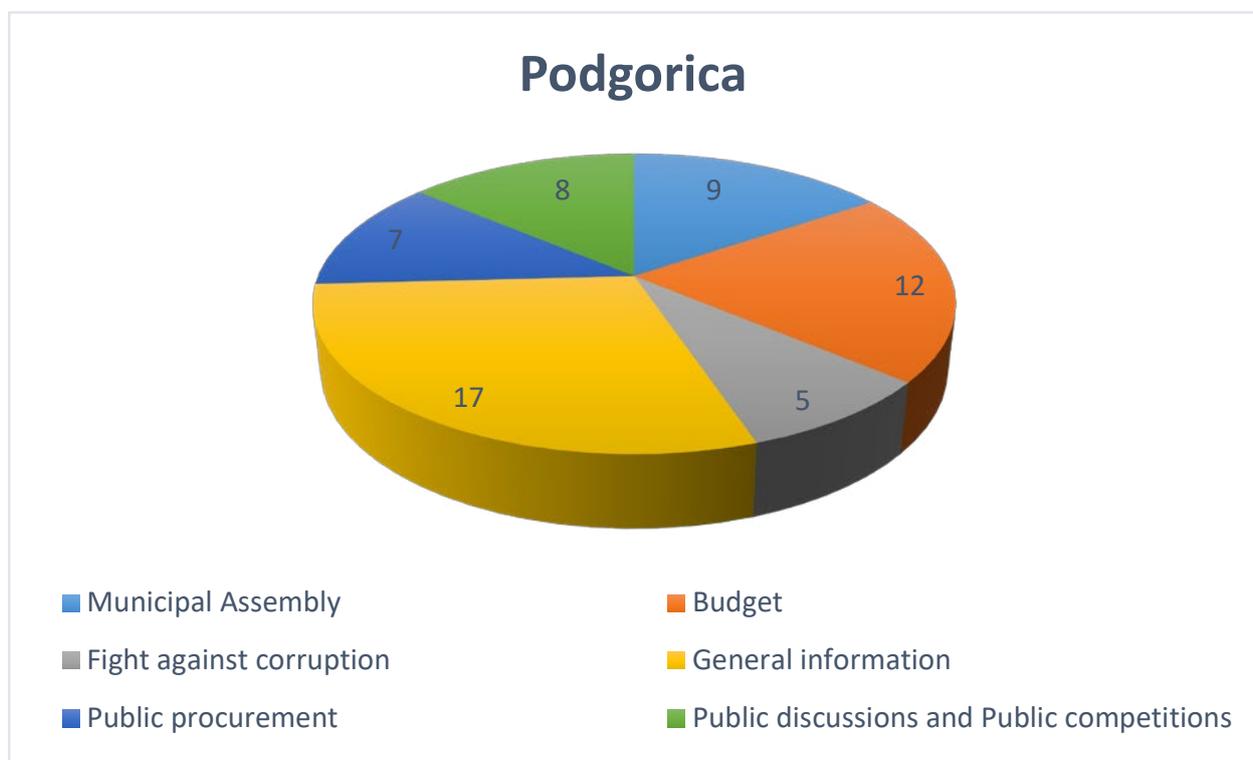


Chart 26: Overview of marks as per area in the Capital City of Podgorica

The website of the Capital City of Podgorica has several sub-websites and a large number of different categories, it is quite clear and offers a variety of content. Although the Capital Podgorica is comparatively one of the two most transparent municipalities, there are areas that are still incomplete in terms of content, and thus should be improved.

• MUNICIPAL ASSEMBLY

The Capital City of Podgorica made available six of the 10 required types of information/documents - decisions adopted by the Capital City Assembly in 2019 (2 points), proposed amendments to the discussed acts (2 points), explanations of proposed amendments (1 point), list of councillors (2 points), minutes from the sessions of the Capital City Assembly (1 point) and information on broadcasting of sessions via one of the media (1 point).

The website does not contain the agenda of the next session of the Capital City Assembly (2 points), the results of voting from the sessions during 2019, information on how the councillors voted individually in 2019, or the contacts of the councillors themselves.

• BUDGET

Out of a total of 10 required documents in the area of the budget, seven are available on the Capital's website. These include the Budget for 2019 (2 points), the explanation of the Budget for 2019 (1 point), the Report on Budget Execution (2 points), the Public Call for Public Discussion on the Budget for 2019 (1 point), the guide for citizens on the Budget (1 point), information that a public discussion on the Budget for 2019 was held (2 points), Report on the public discussion on the Budget for 2019 (2 points) and the Budget for 2020 (1 point).

The Budget in a mechanically readable format (.xls or -xlsx) and information on whether the Final Account of the Budget for 2019 was discussed were not found on the website.

• FIGHT AGAINST CORRUPTION

In the part of the fight against corruption, only three of the 14 required types of information/documents are available on the website of the Capital City of Podgorica - the option for citizens to report irregularities in work or illegalities of local services (2 points), Code of Ethics for Employees (1 point) and the Local Anti-Corruption Plan for 2019 (2 points).

There is no information on the website about the mechanisms for anonymous reporting of corruption, and there is no report or information on the number of submitted and processed complaints for 2019. Also, there is no Integrity Plan for the period 2018-2020, and no report on implementation of the Integrity Plan and the Local Anti-Corruption Plan for 2019. In addition, no information was published on the salaries of public officials and employees, nor on the contacts of the person appointed to act on whistle-blowers reports. At the time of conclusion of this research, the property report of the mayor for 2019 was not available on the website of the Agency for the Prevention of Corruption.

• AVAILABILITY OF INFORMATION

The website of the Capital City of Podgorica has 10 out of a total of 15 required general types of information/documents. This includes a list of municipal inspections in terms of Utilities Inspection and Utilities Police (1 point), data on handling complaints, petitions and objections (2 points), contact of the mayor (2 points) and of the presidents of local communities (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), Municipal Strategic Development Plan (2 points), Annual Work Plan (1 point), data on the number of employees (1 point), Guide for Free Access to Information (1 point), overview of approved requests filed in accordance

with the Law on Free Access to Information (2 points) and contact of a person responsible for answering such requests (2 points).

The following are not available on the website: data on working hours of local self-government, office hours during which the mayor receives the citizens. There is also no Report on the work of the municipality for 2019 or data on the number of employees in public institutions and enterprises of the Capital Podgorica.

- **PUBLIC PROCUREMENT**

On the website of the Capital City of Podgorica, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points), public procurement conducted in 2019 (2 points) and the selected bidder (2 points). The Public Procurement Plan for 2019 and the Report on the Implementation of the Public Procurement Plan for 2019 are not published.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Out of seven types of information/documents related to public discussions and public competitions, data on public discussion conducted in 2019 is available except the one on the Budget (2 points). Reports on public discussions containing data on stakeholder proposals (2 points) and reports on public discussions containing the reasons for accepting or rejecting these proposals (2 points) are available as well. The website also contains competitions for the allocation of funds to non-governmental organizations for 2019 (1 point), as well as the decision on distribution (1 point). There are no data on media competitions or funds given to the media during 2019.

Overall score of the Capital
City of Podgorica

58
points

ROŽAJE

www.rozaje.me

The municipality of Rožaje, with 25 out of 100 possible points, defined by the indicators of this research, is in the category of the most non-transparent Montenegrin municipalities.

The distribution of points across categories is as follows: Municipal Assembly - 6; budget - 2; fight against corruption - 4; availability of information - 5; public procurement - 6; public discussions and public competitions - 2.

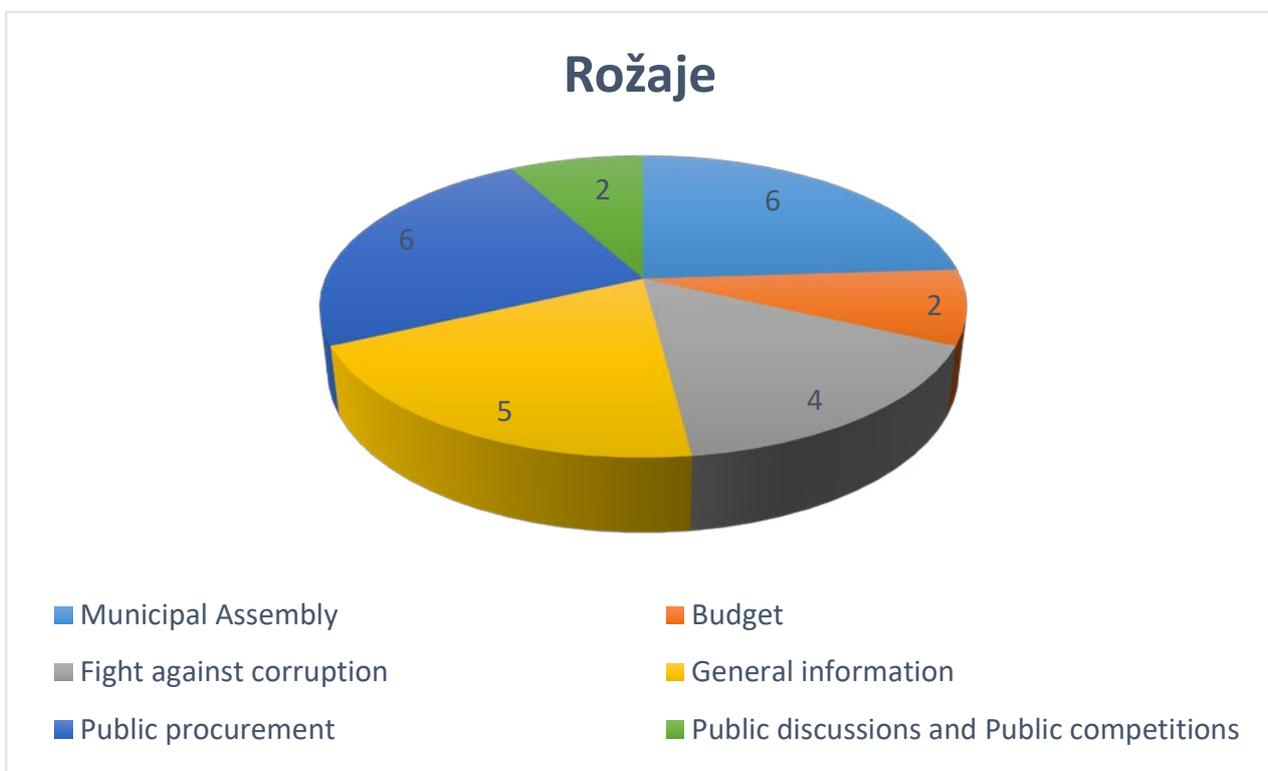


Chart 27: Overview of assessment as per area in the Municipality of Rožaje

Although it seems that the website of the municipality of Rožaje is of a more recent date, it is not sufficiently oriented towards users, nor does it highlight categories that can make it easier for citizens to access service information. Also, for those who want to systematically monitor the implementation of public policies, the job is even more difficult, because certain common categories of information are neither visually prominent nor exist in terms of content.

• MUNICIPAL ASSEMBLY

Out of 10 required types of information and documents in the part of transparency of the work of the Municipal Assembly, there are three on the website of the Municipality of Rožaje - decisions adopted by the Municipal Assembly in 2019 (2 points), the

agenda of the next session (2 points) and the list of councillors (2 points).

It was not possible to find the proposed amendments to the discussed acts, explanations of the proposed amendments, voting results from the sessions of the Municipal Assembly during 2019, how the councillors voted individually in 2019, contacts of councillors, minutes from the sessions of the Municipal Assembly or information whether the sessions are broadcasted via one of the local media.

• BUDGET

In the area of budgetary issues, a particularly worrying degree of non-transparency was noted. Namely, out of 10 types of information/documents that we searched for, only the Budget for 2019 was available on the website.

It was not possible to find the following on the website: explanation of the Budget for 2019, Budget in a mechanically readable format (.xls or -xlsx), Public Call for Public Discussion on the Budget for 2019, information that a public discussion on the Budget for 2019 was held, Report from the public discussion on the Budget for 2019, the Budget for 2020, information on whether the Final Account of the Budget for 2019 was discussed, reports on the execution of the budget for 2019, as well as a guide for citizens through the budget.

• FIGHT AGAINST CORRUPTION

Regarding the fight against corruption, out of 13 required types of information/documents, only the Code of Ethics for Employees was available (2 points) and the property report of the President of Municipality for 2019 (2 points).

There is no information on mechanisms of reporting corruption to the municipality of Rožaje, there is no option for citizens to report irregularities in work or illegalities of local services, nor the possibility of anonymous reporting, and there are also no reports on the number of submitted and processed complaints for 2019. Also, there is no Integrity Plan 2018-2020, Local Anti-Corruption Plan for 2019, nor reports on the implementation of those plans. In addition, no information was published on the salaries of public officials and employees and the contact of a person appointed to deal with whistle-blowers reports.

• AVAILABILITY OF INFORMATION

The website of the municipality of Rožaje has four of the 15 required types of general information/documents - Guide for Access to Information (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), overview of approved requests filed under the Law on Free Access to Information (1 point) and contact of a person responsible for answering such requests (2 points).

The following are not available on the website: information on working hours of local

self-government, data on handling complaints, petitions and objections, data on presidents of local communities, list of municipal inspections, Municipal Strategic Development Plan, Annual Work Plan of the Municipality, Report on Municipal Work for 2019, and office hours during which the president of municipality receives the citizens. Also, data on the number of employees in the municipality and municipal public institutions and enterprises are not available on the website either.

- **PUBLIC PROCUREMENT**

Of the six required types of information/documents related to public procurement, three can be found on the website of the municipality of Rožaje. There is a section on the website dedicated to public procurement (1 point), data on published tenders for public procurement (2 points) and conducted public procurement in 2019 (2 points). On the other hand, the Public Procurement Plan for 2019, the Report on implementation of the public procurement plan for 2019 (2 points) and data on the selected bidders cannot be found on the website of this municipality.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In the area of public discussions and public competitions, out of the seven required types of information/documents, only the data on public discussions conducted in 2019 except the Budget is available (2 points). There are no reports on public discussions containing information on the proposals of stakeholders or reports on public discussions with reasons for accepting or rejecting the submitted proposals. Also, there is no information available on competitions for the allocation of funds to civil society organizations for 2019, decisions on the distribution of these funds, as well as data on the funds allocated for the media in 2019.

Overall score of the
Municipality of Rožaje

25
points

ŠAVNIK

www.savnik.me

The Municipality of Šavnik is at the back of medium transparent municipalities with 30 points.

The distribution of points across categories is as follows: Municipal Assembly - 6; budget - 7; fight against corruption - 2; availability of information - 4; public procurement - 9; public discussions and public competitions - 2.

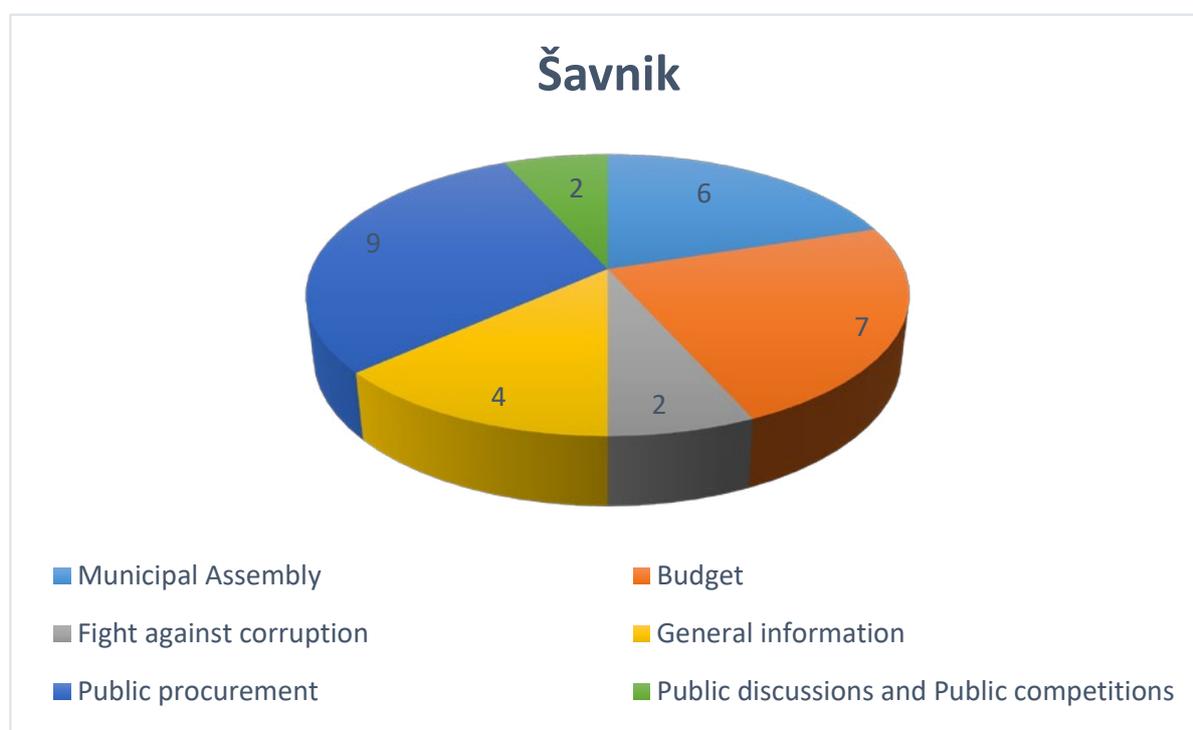


Chart 28: Overview of marks as per area in the Municipality of Šavnik

The municipality of Šavnik has a website that is seemingly clear, but with many missing categories and, more importantly, with very little content related to information and documents that are important for monitoring the work of this local self-government.

• MUNICIPAL ASSEMBLY

Out of 10 required documents/types of information regarding the work of the Municipal Assembly of Šavnik, only three were available on the website - decisions adopted by the Municipal Assembly in 2019 (2 points), the agenda of the next session (2 points) and the list of councillors (2 points).

It was not possible to find the results of voting from the sessions of the Municipal Assembly during 2019, how councillors voted individually in 2019, contacts of councillors, proposed amendments to the discussed acts, explanations of proposed

amendments, minutes from sessions, as well as information on whether the sessions are broadcasted via one of the local media.

• BUDGET

Out of a total of 10 required documents in the area of budget, five are available on the website of this municipality, and they refer to the Budget for 2019 (2 points), Report on budget execution but only for the first quarter (1 point), Public Call for Public Discussion on Budget for 2019 (1 point), information that a public discussion on the Budget for 2019 was held (2 points) and the Budget for 2020 (1 point).

There is no explanation of the Budget for 2019 on the website, nor the Budget itself in a mechanically readable format (.xls or -xlsx), a guide for citizens, information on whether the Final Account of the Budget for 2019 has been discussed, as well as the Report on the conducted public discussion and the Budget for 2019.

• FIGHT AGAINST CORRUPTION

In the area of availability of information related to the fight against corruption, the Municipality of Šavnik is the one lowest rated. Out of 14 required types of information/documents, only the property report of the President of Municipality 2019 (2 points) is available, which can be found on the website of the Agency for Prevention of Corruption (APC).

The website of the municipality of Šavnik does not contain information on mechanisms for reporting corruption or the option for citizens to report irregularities in work or illegalities of local services, which consequently means that these reports cannot be submitted anonymously. In addition, there is no report or information available on the number of submitted and processed complaints during 2019, the Code of Ethics for Employees, the Integrity Plan for the period 2018-2020, the Local Anti-Corruption Plan, as well as reports on their implementation. Also, no information was published on the salaries of public officials and employees, nor the contacts of a person appointed to act on whistle-blowers reports.

• AVAILABILITY OF INFORMATION

When it comes to general information, out of 15 required types of information/documents, it is possible to find only the contact of the President of Municipality (2 points) and the contact of a person responsible for answering the requests for free access to information (2 points).

Data on the working hours of local self-government or a coherent list of municipal inspections are not available, as well as data on the handling of complaints, petitions and objections. The website also does not specify the office hours during which the president of municipality receives the citizens, there is also no data on the presidents of local communities, the Annual Work Plan of the municipality, the Report on the work of the municipality for 2019, the Strategic Plan for Municipal Development and data on the number of employees in the municipality and its public institutions and enterprises, as well as the overview of approved requests filed in accordance with the

Law on Free Access to Information, the Rulebook on Internal Organization and Jobs Systematization, or the Guide for Free Access to Information.

- **PUBLIC PROCUREMENT**

On the website of the municipality of Šavnik, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points), public procurement conducted in 2019 (2 points) and the selected bidder (2 points). The Public Procurement Plan for 2019 is also available (2 points), but there is no Report on implementation of the Public Procurement Plan for 2019.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In this part, on the website of the municipality of Šavnik, there is only data on the public discussions conducted during 2019 except for the Budget (2 points).

There are no reports of public discussions containing information on stakeholder proposals, nor those containing reasons for accepting or rejecting these proposals. Also, data on competitions for funding or allocated funds for the media in 2019 are not available, as well as information on published competitions for the allocation of funds to civil society organizations for 2019 and the manner of their distribution.

Overall score of the
Municipality of Šavnik

30
points

TIVAT

www.opstinativat.me

With a total of 56 points, the municipality of Tivat is at the top of Montenegrin municipalities in terms of transparency, i.e. just behind the two municipalities that share the first place.

The distribution of points across categories is as follows: Municipal Assembly - 8; budget - 10; fight against corruption - 4; availability of information - 17; public procurement - 9; public discussions and public competitions - 8.

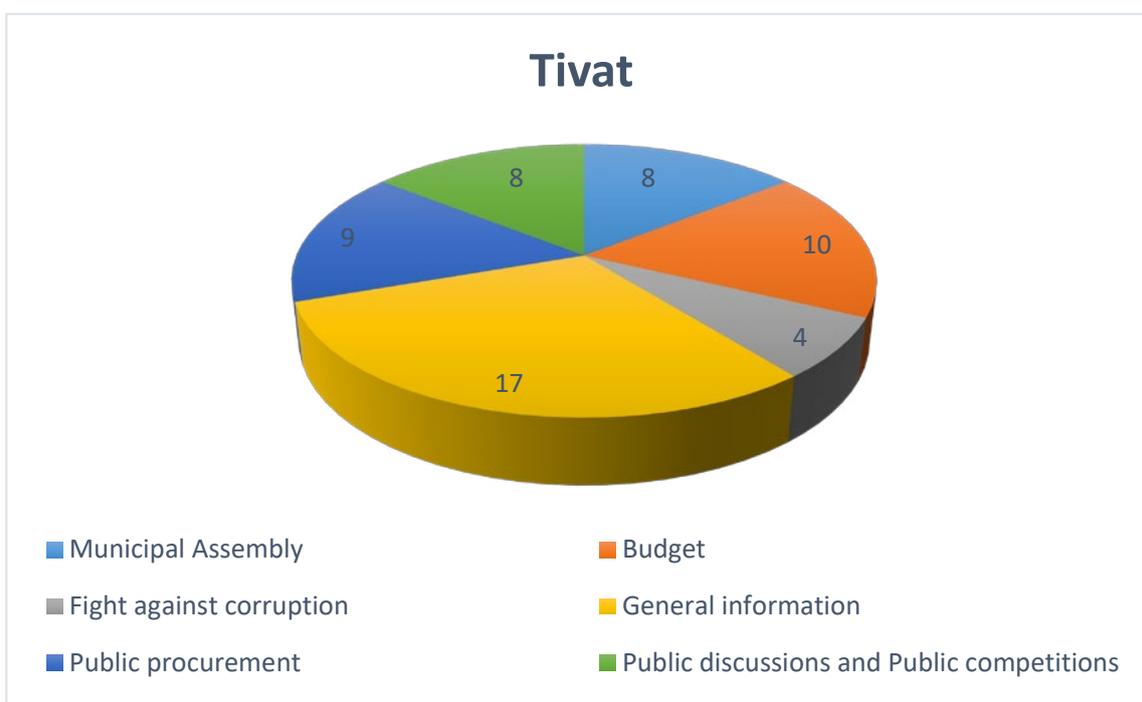


Chart 29: Overview of marks as per area in Municipality of Tivat

The website of the municipality of Tivat is modern, clear and functional. It contains a significant scope of information, but there is space for improvement in the part of information and documents that are important from the point of view of monitoring of public policies, but also the overall informing of citizens about the work of the municipality.

• MUNICIPAL ASSEMBLY

In this part, out of 10 required types of information/documents, five are published on the website of the Municipality of Tivat, and they refer to the decisions adopted by the Municipal Assembly in 2019 (2 points), the agenda of the next session (2 points), the list of councillors (2 points), minutes from the sessions of the Municipal Assembly (1 point), as well as information on whether the sessions of the Municipal Assembly are broadcasted via any of the media (1 point).

However, on the website of the municipality of Tivat, there are no proposed amendments

to the discussed acts, explanations of the proposed amendments, voting results from the sessions of the Municipal Assembly during 2019, how councillors voted individually in 2019, nor contacts of councillors.

• BUDGET

Out of a total of 10 required documents in the area of budget, six are available on the website, as follows: Budget for 2019 (2 points), Report on Execution of the Budget for 2019 (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point), information on the public discussion conducted on the Budget for 2019 (2 points), Report on the public discussion on the Budget for 2019 (2 points) and the Budget for 2020 (1).

There is no explanation of the Budget for 2019 on the website, nor is the Budget itself available in a mechanically readable format (.xls or -xlsx). There is no guide for citizens through the budget, as well as information on whether the Final Account of the Budget for 2019 has been discussed.

• FIGHT AGAINST CORRUPTION

In the part related to the fight against corruption, out of 14 required types of information/documents, only information on mechanisms for anonymous reporting of corruption (2 points) and the option for citizens to report irregularities or illegalities in work via the 48h system are available on the website (2 points).

The website does not contain reports or information on the number of submitted and processed complaints during 2019, as well as the Code of Ethics for Employees. Also, there is no Local Anti-Corruption Plan for 2019 and Integrity Plan for the period 2018-2020, nor reports on their implementation. No information was published on the salaries of public officials and employees, the contact of a person who is appointed to act on whistle-blowers reports, and until the conclusion of this research, the property report of the president of municipality for 2019 was not published on the website of the Agency for Prevention of Corruption.

• AVAILABILITY OF INFORMATION

The website of the municipality of Tivat contains 10 of the 15 required general types of information/documents: contact of the President of Municipality (2 points) and of presidents of local communities (2 points), lists of municipal inspections (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), Municipal Strategic Development Plan of Tivat (2 points), Annual Work Plan of the Municipality (1 point), data on the number of employees in the Municipality (1 point), Guide for Access to Information (1 point), overview of approved requests filed according to the Law on Free Access to Information (2 points) and a contact of a person responsible for answering such requests (2 points).

There is no data on website on working hours of the local self-government, nor are office hours during which the president of municipality receives the citizens specified. Also, there is no information on the handling of complaints, petitions and objections, the Report on the work of the municipality of Tivat for 2019, as well as data on the number of employees in public institutions and enterprises in this municipality.

- **PUBLIC PROCUREMENT**

In the area of public procurement, almost all required types of information/documents are available, which includes: section dedicated to public procurement (1 point) with the Public Procurement Plan for 2019 (2 points), data on public procurement tenders published during 2019 (2 points), as well as data on conducted public procurements (2 points) and selected bidders (2 points). The Report on the implementation of the Public Procurement Plan for 2019 is the only one available on the website.

- **PUBLIC DISCUSSIONS AND COMPETITIONS**

Of the seven required types of information/documents related to public discussions and public competitions, data on public discussions conducted in 2019 except the Budget (2 points) is available, as well as reports on public discussions containing data on stakeholder proposals (2 points) and reasons for accepting or rejecting these proposals (2 points), competitions for the allocation of funds to civil society organizations for 2019 (1 point) and decisions on the manner of their distribution (1 point). There is no data on competitions or allocated funds to the media in 2019.

Overall score of the
Municipality of Tivat



TUZI

www.tuzi.org.me

Municipality of Tuzi, with 38 out of the total 100 points, ranks among medium-transparent municipalities in a comparative ratio with other Montenegrin municipalities.

The distribution of points across categories is as follows: Municipal Assembly - 6; budget - 9; fight against corruption - 1; availability of information - 9; public procurement - 11; public discussions and public competitions - 2.

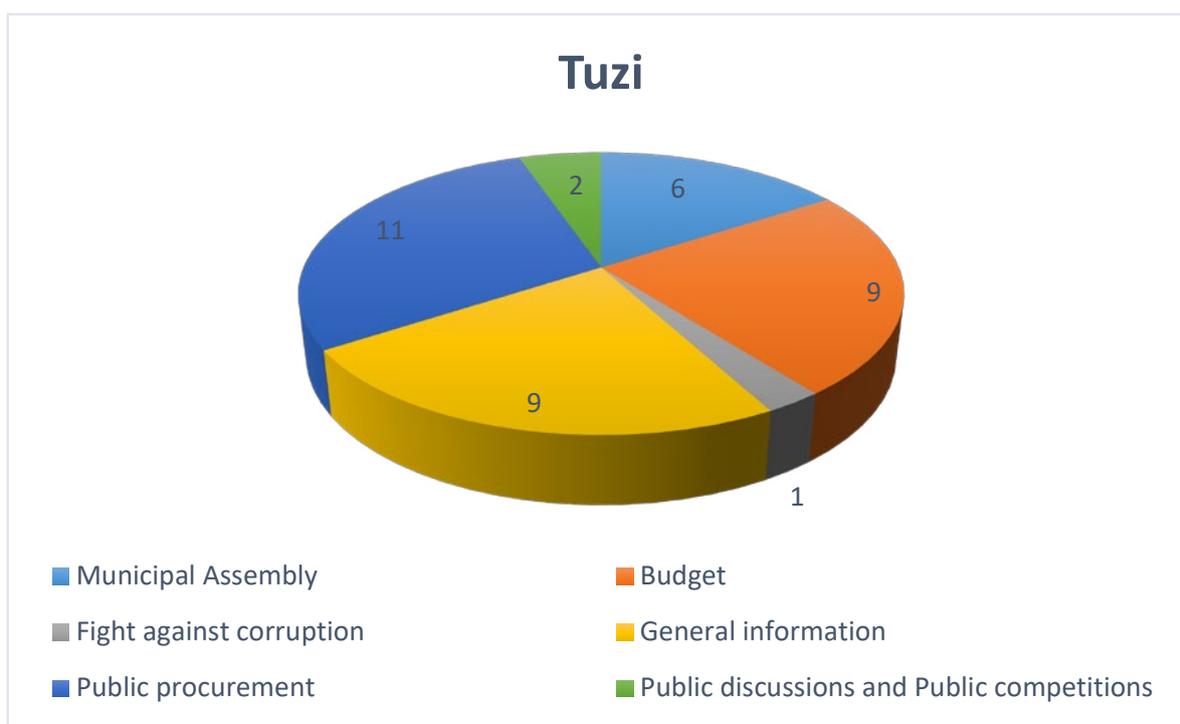


Chart 30: Overview of marks as per area in the municipality of Tuzi

The municipality of Tuzi has a website with a clear concept that is easy to search, but in terms of content it requires serious improvements in order to make relevant information available to citizens, as well as those related to effective monitoring of public policies.

• MUNICIPAL ASSEMBLY

Out of 10 required documents related to the work of the Municipal Assembly, only three are available - decisions adopted by the Municipal Assembly in 2019 (2 points), the agenda of the next session (2 points) and the list of councillors (2 points).

On the website of the municipality of Tuzi, there are no proposed amendments to the discussed acts, explanations of the proposed amendments, voting results from the sessions of the Municipal Assembly during 2019, as well as how the councillors voted individually. Also, there are no minutes from the sessions of the Municipal Assembly,

information on the broadcast of sessions via any of the local media, but also no contacts of councillors.

• BUDGET

In the part of budget management, six documents are available on the website of this municipality - Budget for 2019 (2 points), explanation of the Budget for 2019 (1 point), Budget in a mechanically readable format (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point), information that a public discussion on the Budget for 2019 was held (2 points) and the Budget for 2020 (1). The municipality of Tuzi is one of the few Montenegrin municipalities that has an available Budget for 2019 in a mechanically readable format (.xls or -xlsx).

However, there is no information on the website whether the Final Account of the Budget for 2019 was discussed, as well as the Report on Budget Execution for 2019, the Report on Public Discussion on the Budget for 2019 or the guide for citizens through the budget.

• FIGHT AGAINST CORRUPTION

There is almost no data on the fight against corruption. Namely, out of 13 required types of information/documents, only information on salaries of public officials is available (1 point).

The website does not have the option for citizens to report irregularities in work illegalities of local services, there is no information on mechanisms for anonymous reporting of corruption or a report or information on the number of submitted and processed complaints for 2019. In addition, the Integrity Plan 2018-2020, the Local Anti-Corruption Plan for 2019 and reports on their implementation are not available. Also, information on the salaries of employees, the contact of a person appointed to act on whistle-blowers reports, as well as the Code of Ethics for Employees were not published. Finally, until the conclusion of this research, a property report of the president of municipality was not available.

• AVAILABILITY OF INFORMATION

Website of Municipality of Tuzi has 5 out of the 15 required types of general information/documents - data on working hours of local self-government (2 points), list of municipal inspections in the part of Utilities Inspection (1 point), Guide for Free Access to Information (2 points), overview of approved requests filed according to the Law on Free Access to Information (2 points) and a contact of a person responsible for answering such requests (2 points).

The website does not contain the contact of the President of Municipality or of the presidents of local communities, as well as information on the handling of complaints, petitions and objections, nor are office hours during which the president of the municipality receives the citizens specified. Also, the website does not have the Municipal Strategic Development Plan of Tuzi, the Annual Work Plan of the

Municipality of Tuzi, the Rulebook on Internal Organization and Jobs Systematization and the Report on the Work of the Municipality for 2019. Finally, data on the number of employees in the municipality, as well as in public institutions and enterprises in the municipality are not available.

- **PUBLIC PROCUREMENT**

On the website of the municipality of Tuzi, there is all the required data in the area of public procurement, which includes a section dedicated to public procurement (1 point), the Public Procurement Plan for 2019 (2 points) and the Report on the implementation of the Public Procurement Plan for 2019 (2 points). Also, data on published tenders for public procurement (2 points), public procurement conducted in 2019 (2 points) and data on the selected bidder (2 points) are available as well.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

When it comes to public discussions and public competitions, only one of the seven required types of information exists - data on public discussions conducted in 2019 except for the Budget (2 points). Reports on public discussions containing information on stakeholder proposals or the reasons for accepting or rejecting these amendments, competitions for the allocation of funds to the media and NGOs for 2019, as well as information on the distribution of funds to these entities are not available.

Overall score of the
Municipality of Tuzi

38
points

ULCINJ

www.ul-gov.me

The Municipality of Ulcinj, with 37 points, belongs to the category of medium-transparent Montenegrin municipalities, whereby it should be emphasized that the overall transparency of all municipalities is rather low.

The distribution of points across categories is as follows: Municipal Assembly - 8; budget - 6; fight against corruption - 8; availability of information - 10; public procurement - 3; public discussions and public competitions - 2.

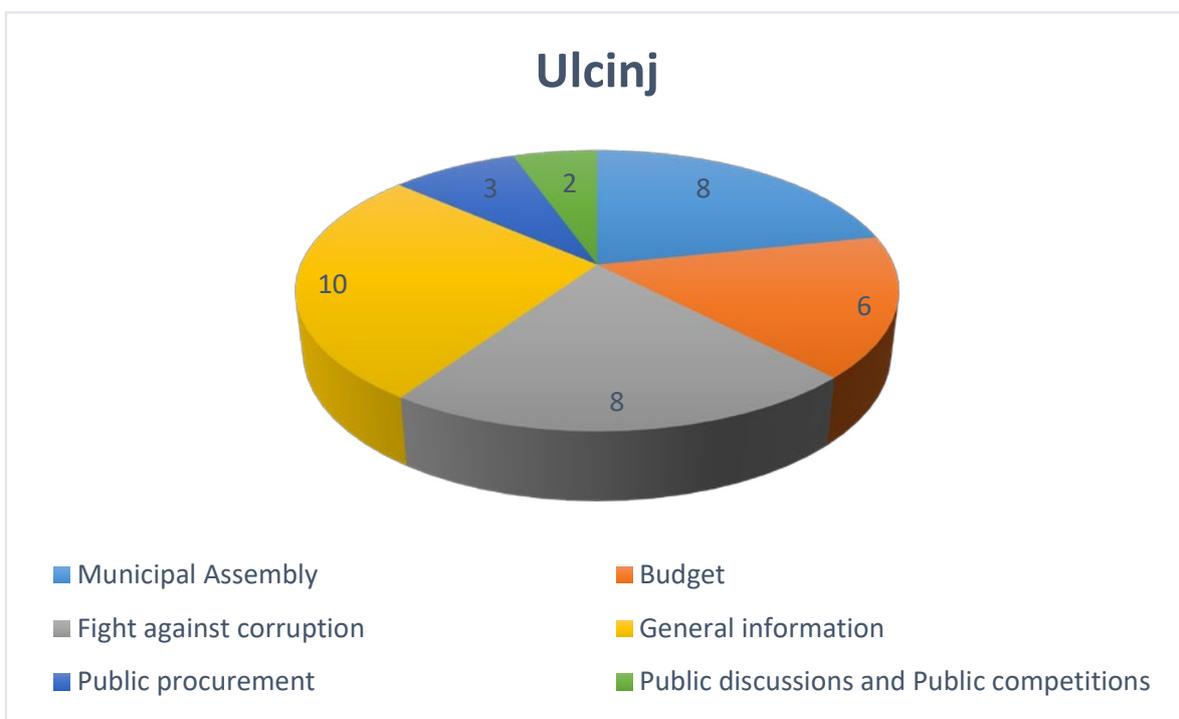


Chart 31: Overview of marks as per area in Municipality of Ulcinj

The website of Municipality of Ulcinj is trilingual (Montenegrin, Albanian and English), it is clear but with an insufficient number of documents that enable effective monitoring of public policies, as well as information that citizens need.

• MUNICIPAL ASSEMBLY

Out of 10 required documents in the area of work of the Municipal Assembly, five were available during the research - decisions adopted by the Municipal Assembly in 2019 (2 points), agenda of the next session (2 points), list of councillors (2 points), minutes from the sessions Municipal Assembly (1 point) and information that sessions are broadcasted directly via local media (1 point).

The results of voting from the sessions of the Municipal Assembly during 2019, amendments to the discussed acts, explanations of the proposed amendments,

how councillors voted individually in 2019, as well as contacts of councillors were not available on the website of the municipality of Ulcinj.

• BUDGET

In the part of the budget, out of 10 required documents, four are available on the website of the Municipality of Ulcinj - Budget for 2019 (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point), information on the Public Discussion conducted on the Budget for 2019 (2 points) and the Budget for 2020 (1).

There was no explanation of the Budget for 2019 on the website, the Report on Budget Execution for 2019 or that Budget in a mechanically readable format (.xls or -xlsx). Also, there was no report available on the conducted Public Discussion on the Budget for 2019, information on whether the Final Account of the Budget for 2019 was considered, as well as a guide for citizens through the Budget for 2019.

• FIGHT AGAINST CORRUPTION

In terms of the fight against corruption, data is very limited. Thus, out of 14 required types of information/documents, only four can be found. The following is available on the website of the Municipality of Ulcinj: information on mechanisms for reporting corruption (2 points), the option for citizens to report irregularities or illegalities in work (2 points) and the Integrity Plan for the period 2018-2020 (2 points). On the website of the Agency for the Prevention of Corruption, there is a property report of the President for 2019 (2 points).

The website does not have a report or information on the number of submitted and processed complaints for 2019, the Report on the implementation of the Integrity Plan, the Local Anti-Corruption Plan and the report on its implementation. In addition, information on salaries of public officials and employees, the Code of Ethics for Employees, as well as the contacts of the person appointed to act on whistle-blowers reports are not published.

• AVAILABILITY OF INFORMATION

In the part of general availability of data, the municipality of Ulcinj has available five of the 15 required types of information/documents - contact of the President (2 points), Municipal Strategic Development Plan (2 points), Guide for Free Access to Information (2 points), overview of approved requests filed according to Law on Free Access to Information (2 points) and contact of a person responsible for answering such requests (2 points).

Data on the working hours of the municipality or office hours during which the president of municipality receives the citizens are not available. In addition, there are no lists of municipal inspections and contacts of local community presidents. The website also does not contain data on the handling of complaints, petitions and objections, the Annual Work Plan of the municipality, the Report on the work of the municipality of Ulcinj for 2019, as well as data on the number of employees in the municipality and its public institutions and enterprises.

- **PUBLIC PROCUREMENT**

On the website of the Municipality of Ulcinj, there is a section dedicated to public procurement (1 point) with data on published tenders for public procurement (2 points). The Public Procurement Plan for 2019 has not been published, as well as information on the public procurement conducted in 2019, the selected bidder, nor the Report on the implementation of the Public Procurement Plan for 2019.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

Out of the seven required types of information in this segment, only data on the public discussions conducted during 2019 except the Budget is available on the website of the Municipality of Ulcinj (2 points). There are no reports of public discussions available that contain information on stakeholder proposals or reasons for accepting or rejecting those proposals. Also, data on competitions for funding or allocated funds for the media and non-governmental organizations in 2019 are not available.

Overall score of the
Municipality of Ulcinj

37
points

ŽABLJAK

www.zabljak.me

According to the indicators of this research, the municipality of Žabljak has 43 points and belongs to the category of medium transparent Montenegrin municipalities.

The distribution of points across categories is as follows: Municipal Assembly - 7; budget - 11; fight against corruption - 3; availability of information - 11; public Procurement - 9; public discussions and public competitions - 2.

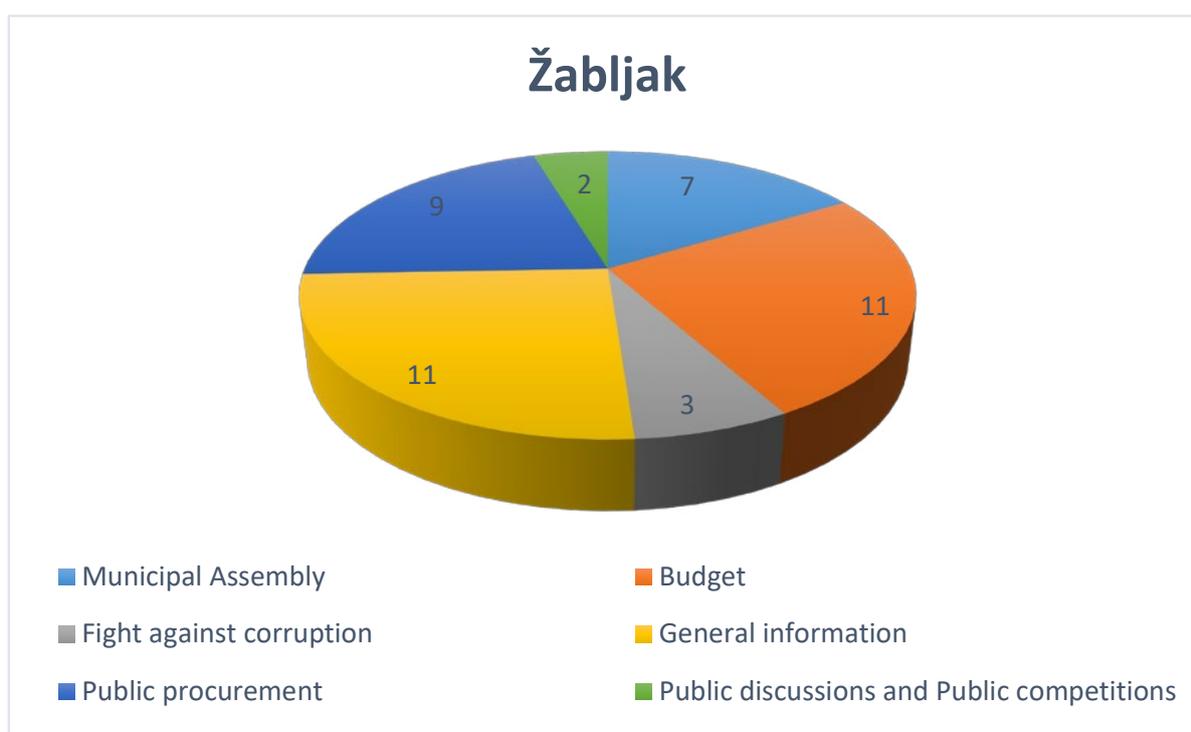


Chart 32: Overview of marks as per area in Municipality of Žabljak

The website of the Žabljak Municipality is clear, although it could be visually and technically refreshed, and the content lacks a significant amount of information that is important for thoroughly monitoring the work of this municipality.

• MUNICIPAL ASSEMBLY

In the part that refers to the work of the Municipal Assembly, the decisions that the Municipal Assembly has adopted in 2019 are published on the website of the Municipality of Žabljak (2 points), as well as the agenda of the next session (2 points), the list of councillors (2 points) and minutes from the sessions of the Municipal Assembly (1 point).

However, the research team was unable to find the results of voting from the sessions of the Municipal Assembly during 2019, proposed amendments to the discussed acts, as well as the explanations of those amendments on the website. Also, there is no information

on how councillors voted individually in 2019, contacts of the councillors themselves or information on whether the sessions are broadcasted directly via any local media.

• BUDGET

In the category related to budget, out of the 10 required types of information/documents, seven can be found on the website of Municipality of Žabljak, and these relate to the 2019 Budget (2 points), as well as its version in mechanically readable format (2 points), the Budget Execution Report (2 points), Public Call for Public Discussion on the Budget for 2019 (1 point), information that this public discussion was held (2 points), report on the conducted public discussion (2 points) and the Budget for 2020 (1 point). It is worth mentioning that the Municipality of Žabljak is among the few Montenegrin municipalities that has a Budget for 2019 available in a mechanically readable format (.xls or -xlsx).

The website does not contain explanations of the Budget, a guide for citizens, nor the information on whether the Final Account of the Budget for 2019 has been discussed.

• FIGHT AGAINST CORRUPTION

When it comes to fight against corruption, the scope of available information is significantly smaller. Namely, out of 14 required types of information/documents, only two are available on the website - Integrity Plan (2 points) and information on the salaries of public officials (1 point).

The website does not have 12 other required types of information/documents regarding the Code of Ethics for employees, the Integrity Plan Implementation Report, the Local Anti-Corruption Plan and Report on its implementation. Also, there is no information on the available mechanisms for reporting corruption nor the option for citizens to report irregularities at work i.e. illegalities, and thus consequently, there is no possibility of anonymous reporting. Finally, there are no reports on the number of complaints filed and processed during 2019, information on the salaries of employees or the contact of the person who was appointed to act on whistle-blowers reports. At the time of completion of this research, the property report of the president of municipality for 2019 was also unavailable.

• AVAILABILITY OF INFORMATION

The Municipality of Žabljak has made available the contact of the President of the Municipality (2 points), Rulebook on Internal Organization and Jobs Systematization (1 point), Municipal Strategic Development Plan (2 points), Annual Work Plan (1 point), as well as Guide to Access to Information (2 points), overview of approved requests filed pursuant to the Law on Free Access to Information (2 points) and a contact of a person responsible for answering such requests (2 points).

On the other hand, within this general information, there is no available information on working hours of the municipality or date for reception by the President of Municipality. Also, there are no contacts of the presidents of local communities, lists of municipal inspections, or data on the handling of complaints, petitions and

objections. The Municipality's Annual Work Plan, Work Report as well as data on the number of employees in the municipality and its public institutions and enterprises are not available on the website of the Municipality for 2019.

- **PUBLIC PROCUREMENT**

On the website of the municipality of Žabljak, there is a section dedicated to public procurement (1 point) with the Public Procurement Plan for 2019 (2 points), data on published tenders for public procurement (2 points), public procurement conducted in 2019 (2 points) and selected bidder (2 points). Of the six required documents, only Report on the implementation of the Public Procurement Plan for 2019 is missing.

- **PUBLIC DISCUSSIONS AND PUBLIC COMPETITIONS**

In this area, there are only announcements of competitions for the allocation of funds to the civil society organizations for 2019 (1 point) and the accompanying decision on that distribution (1 point). There is no data on public discussions conducted during 2019 (excluding Budget), public discussions' reports with proposals from stakeholders or the reasons for their acceptance or rejection. There is no information on competitions for funding or allocated funds to the media.

Overall score of the
Municipality of Žabljak

43
points

CITIZEN'S PERCEPTION OF CORRUPTION IN MONTENEGRO

In order to obtain a broader view of the problem of corruption and identify ongoing perceptions of this problem, a public opinion poll was conducted by the IPSOS Strategic Marketing Agency on a representative random three-stage stratified sample of 1,060 adult citizens of Montenegro. The survey was conducted in 17 cities in Montenegro, comprising territories of 130 territories of polling stations, i.e. urban, suburban and rural environments. Field data collection was conducted from 29 February to 7 March 2020. As a similar survey had been conducted in 2017, as part of an earlier CCE project on local corruption, data have been compared to check for trends or fluctuations in citizens' perceptions.

General perception of corruption and corruptive behaviour of institutions

Citizens of Montenegro recognize different types of corruption, and in the greatest percentage they associate corruption with bribery, i.e. giving or taking money or gifts in exchange for a service. Some also define abuse of office, embezzlement and employment through nepotism as corrupt acts, and some even describe the overall situation in the society as corruption.

As many as 89% of citizens recognize bribery of professors and police officers as corrupt acts, followed by bribery of administrative officials and doctors and employment through political party line. The lowest percentage of the respondents identified reliance on acquaintances to obtain an official document (69%) as corruption, and this is also the category in which we observe the largest drop compared to three years ago.

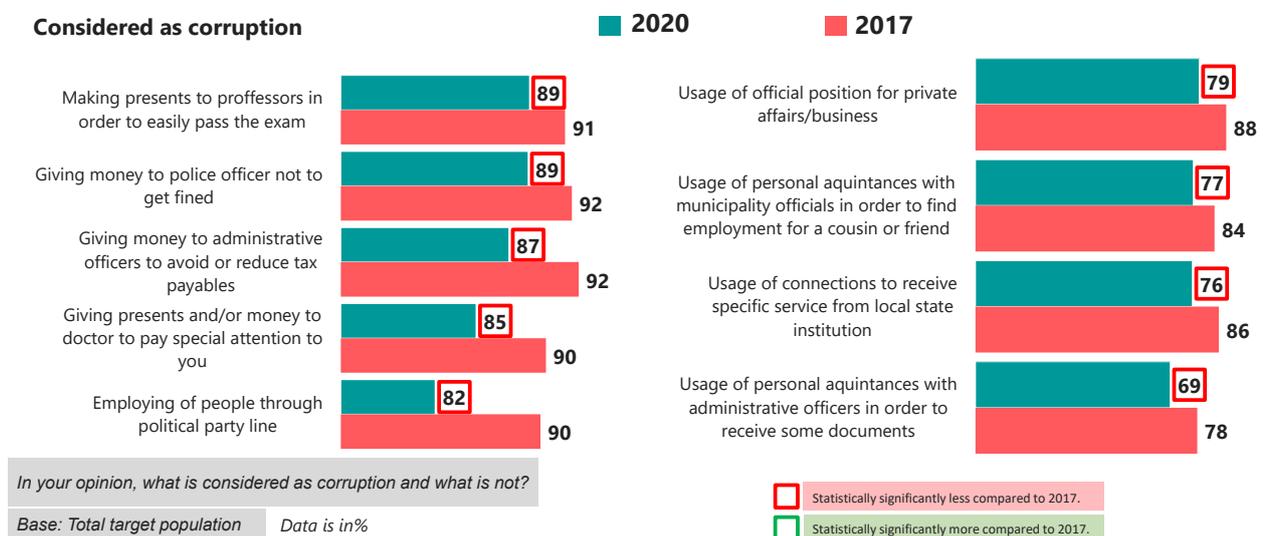
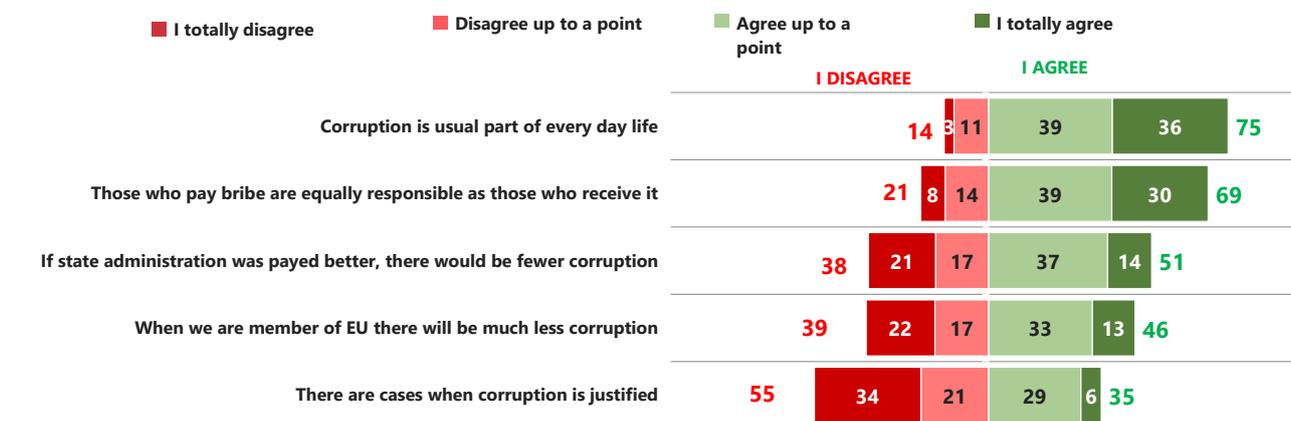


Chart 33: Recognition of the existing forms of corruption

It is especially worrying that as many as 75% of Montenegrin citizens perceive corruption as a part of everyday life. Almost every second respondent believes that this could be changed by joining the European Union, as well as by increasing the salaries of civil servants. Although responsibility for bribes is seen as falling on both sides (69%), a one-third of the respondents consider that corruption can be justified in some cases.



Up to what point do you agree with these statements?

Base: Total target population Data is in%

Chart 34: Percent of respondents agreeing with different statements on corruption

A significant percentage of citizens believe that corruption is present in institutions and consequently no Montenegrin institution enjoys high levels of trust. Two-thirds of respondents say that corruption is present in health-care institutions and political parties. The results are also worrying for the Administration for Inspection Affairs, the Customs Administration and the Police Administration (63%), followed by the Prosecution, the Department of Public Revenues and the media (61%), as well as the judiciary (60%). It is interesting to note that the perception of corruption in the Department of Public Revenues has dropped from 66% in 2017 to 61% in 2020, especially given recent developments in the 'Klap' case, in which several officials of the Department of Public Revenues were arrested on suspicion of having committed corruption-related criminal offences. Compared to 2017, slightly better results were also recorded by local self-governments. Three years ago, the percentage of those who perceived local self-governments as corrupt was 63%, but in 2020 it was 56%.

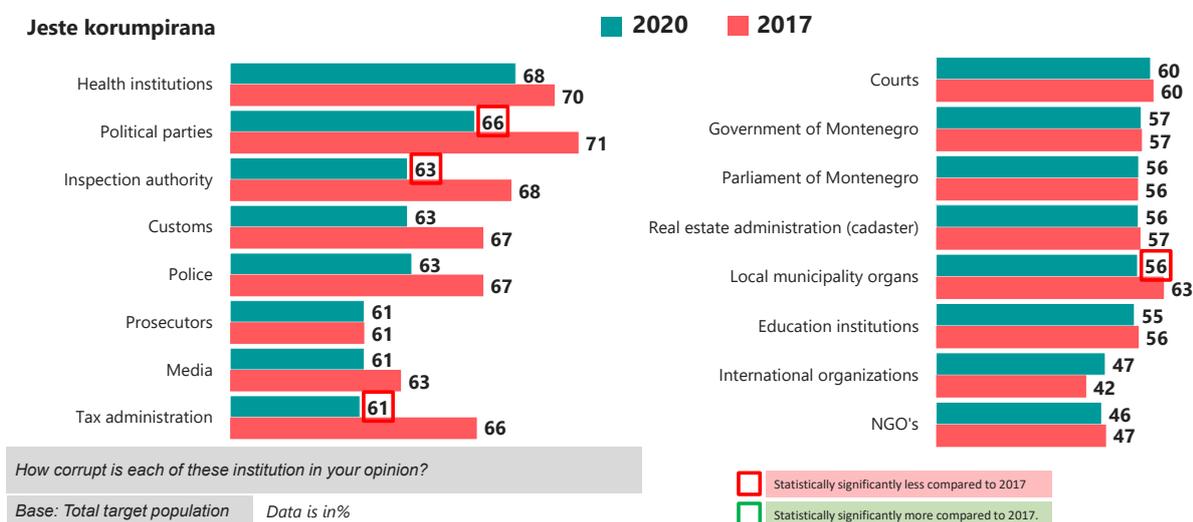


Chart 35: Perceptions of corruptive behaviour in institutions

When it comes to their own corruptive behaviour, Montenegrin citizens mostly state that they are not ready to pay bribes if someone from the institutions asks them to, i.e. only 9% of them admit that they would pay bribes. A little more than a quarter state that they would report the case to an authorised institution, while almost a quarter of the respondents would not take any measures.

Corruption at the local and national levels

Most of the respondents believe that corruption is equally present at the local and the national levels and identify as the dominant form of corruption a situation in which state officials receive gifts to solve someone's private problem. Compared to a survey of three years ago, perception of corruption at the local level is much lower.

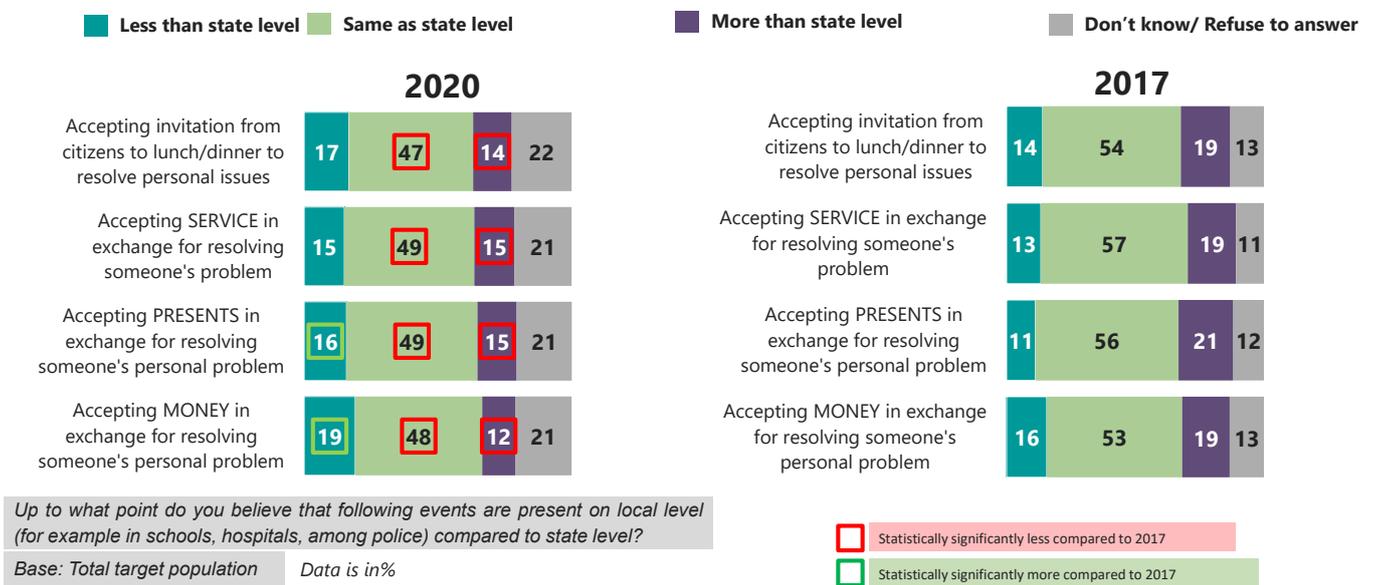


Chart 36: Perception of corruption at local and national levels

When it comes to the political party ties, almost 60% of citizens estimate that there is no difference between the local and the national level. However, compared to the previous survey, a greater number of citizens believe that party ties are used more at the national than at the local level, while the number of those who believe party ties are used more locally, or that there is no difference, has fallen.

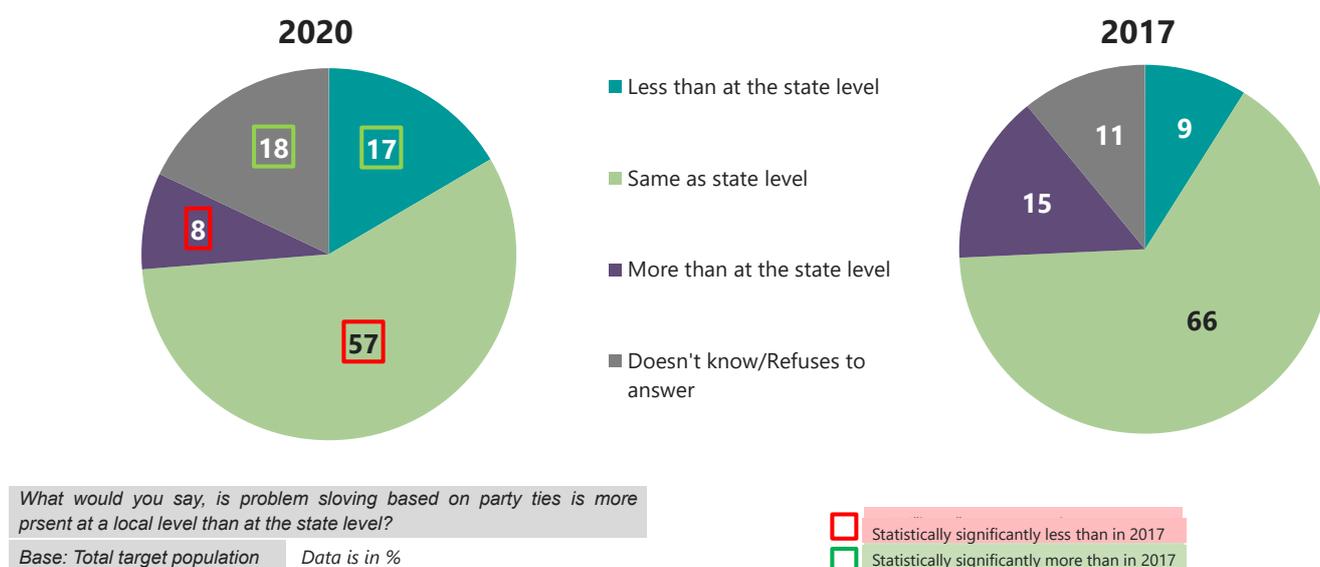


Chart 37: Use of party ties to solve problems at the local and national levels

Frequency of corruptive practices

Asked for their personal experiences with corruption, around one quarter of the citizens stated that they knew or had heard of several cases of bribery in their environment and slightly fewer claim to have heard of only one such case. Those who know of or have heard about one corruption case usually refer to a case of someone giving money to an official, while those who know about multiple corruption cases most frequently mention instances of gift giving.

Most citizens (71%) are not aware of a single reported corruption cases in their place of residence that would have been adjudicated in favour of the damaged party. Although this percentage is lower than in 2017 (80%), it is still worryingly high.

Among the main reasons for receiving and giving bribes, citizens state the absence of fines and low salaries, as well as difficulties in obtaining the necessary services through regular procedures. It is important to point out that the ineffectiveness of bodies specialized for the fight against corruption, as well as the lack of awareness of the harmful effects of corruption, also play a significant role in this.

Awareness of the role of documents and institutions in the fight against corruption

The percentage of citizens who are not adequately informed about the laws and documents that lay the basis for the fight against corruption is still alarmingly high. The percentage of those who are aware of the Law on Prevention of Corruption is the highest – 66%. At a first glance, this may seem positive, but it should be noted that the same percentage was recorded in 2017, which indicates that no progress has occurred, and the fact that one quarter has not even heard of this law is also not negligible. Moreover, only half of the respondents state that they are aware of the Criminal Code, which is significantly less compared to the previous survey in 2017 when this percentage was 65%.

The survey also asked the respondents about several institutions that are key in the suppression of corruption - the Agency for the Prevention of Corruption (APC), the Special State Prosecution (SSP) and the State Audit Institution (SAI).

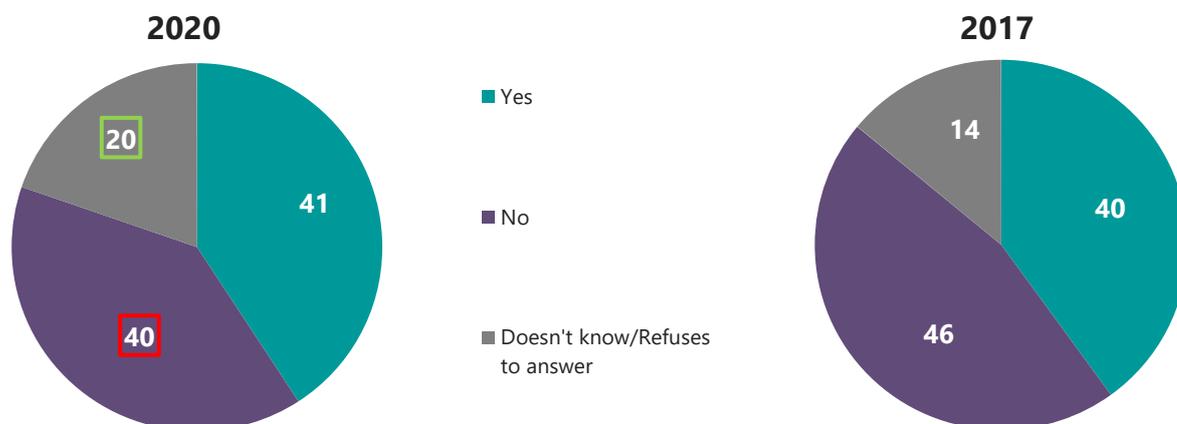
Even after four years of existence of the Agency for the Prevention of Corruption, citizens are not sufficiently informed about this institution. Three-quarters of them have heard about the APC, but two-fifths do not know enough about the jurisdiction and work of the APC. For example, 48% of respondents think criminal prosecution of corruption cases is a responsibility of the APC, which is wrong. The percentage of those who know that prevention and education in the fight against corruption are APC's responsibilities remains at almost the same level as in 2017. Of particular concern is that only 5% of respondents in 2020 know that the protection of whistle-blowers is one of the responsibilities of the Agency, compared to 15% in 2017. Finally, in three years, there has been no significant growth in the positive perception of the APC's work (15%). The number of those who have a neutral (18%) and negative attitude (32%) has decreased, while the number of those who do not want to express their opinion about the APC has tripled (35%).

The work of the Special State Prosecution in the fight against corruption is negatively assessed by 42% of citizens, 23% give a neutral and 17% positive. Here too the number of respondents who could not give a definite opinion on the work of this institution increased since 2017, while the number of those with a negative and neutral stance declined slightly.

Most of the respondents are dissatisfied with the work of the State Audit Institution, i.e. 39% of them negatively assess the work of the State Audit Institution, while only 17% have a positive attitude and 22% take a neutral position - almost identical to the percentage of undecided ones.

Reporting corruption

Citizens are divided on whether to report corruption or not, with 41% saying they would report corruption and 40% saying they would not, while almost a fifth are undecided. Compared to the 2017 survey, there is a significant decline in the number of those who would report corruption, and the number of undecided ones is growing.



All in all, would you report a corruption case?

Base: Total target population

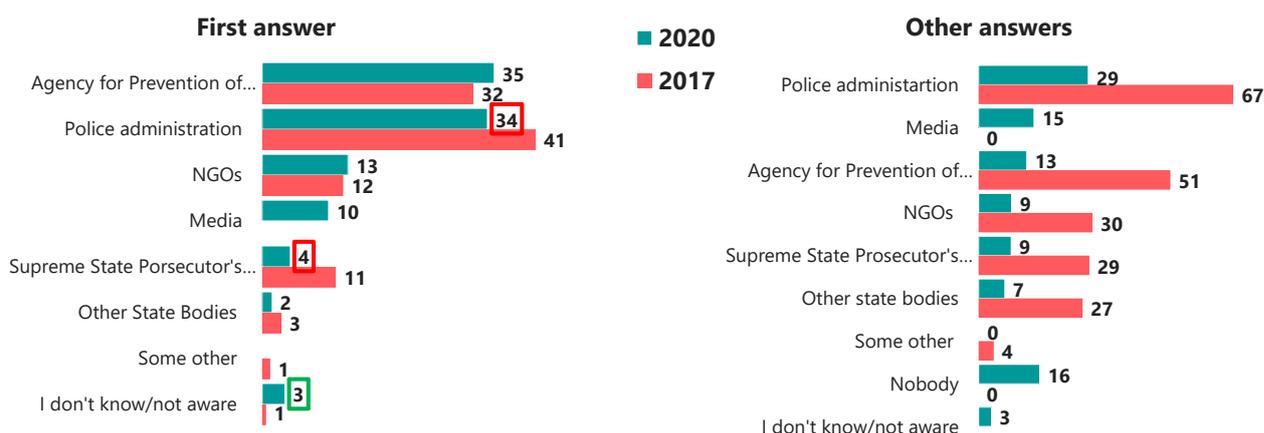
Data is in %

Statistically significantly less than in 2017
 Statistically significantly more than in 2017

Chart 38: Readiness to report corruption

More citizens would report corruption if given the opportunity to do so anonymously (47%), but even then 38% would not report corruption and 15% are undecided.

The APC and the Police Administration are most frequently cited as institutions to which the citizens would first report a case of corruption, followed by NGOs and the media. Compared to 2017, there is a slightly higher percentage of those who would report corruption to the APC, while the number of citizens who would report corruption to the Police Administration has dropped significantly (from 41% to 34%).



To which institution would you first report corruption case? And to whom else?

Podaci su u %

Base: Those who would report a corruption case (2020: 41% of the total target population, 2017: 40% of the total target population)

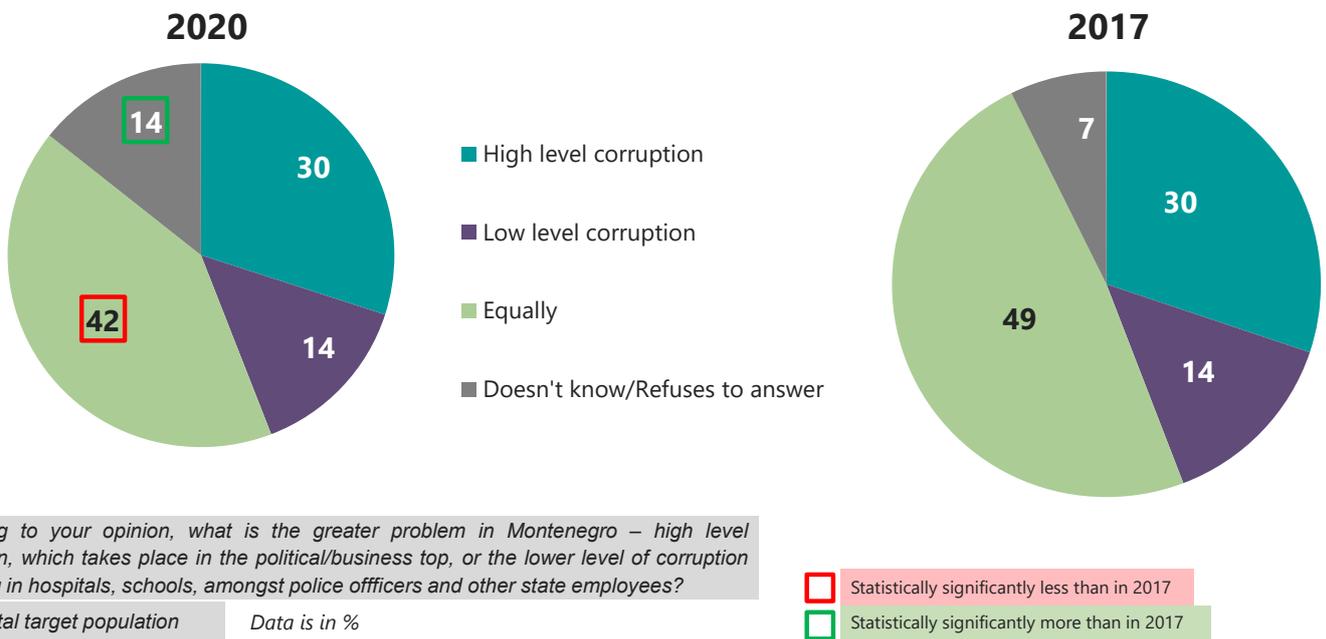
Statistically significantly less than in 2017
 Statistically significantly more than in 2017

Chart 39: Institutions to which citizens would first report corruption

Among those who say they would not report corruption, the most frequently given reason (28%) is that detecting corruption is the job of the state. Another quarter said they did not believe it would have any effect or that they would fear for their personal safety. Every tenth respondent believes that corruption is one of the strategies people use just to survive and that this is a reason why they would not report corruption.

High and low corruption and how to eradicate it

When asked whether high-level corruption (among the political and business elite) or corruption at lower levels, e.g. in hospitals, schools, in contact with the police and/or other civil servants is a bigger problem for the society, 42% of the citizens said that both levels of corruption were equally problematic, 30% that high-level corruption is the bigger problem, and only 14% that corruption at lower levels was the bigger problem. Compared to 2017, far fewer respondents thought that high-level corruption and lower-level corruption were equally problematic in Montenegro.



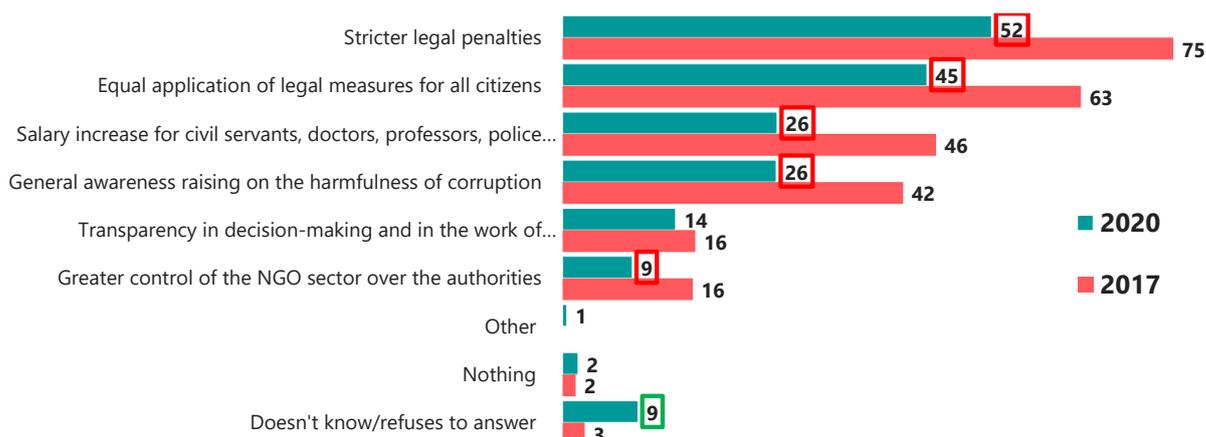
According to your opinion, what is the greater problem in Montenegro – high level corruption, which takes place in the political/business top, or the lower level of corruption hapening in hospitals, schools, amongst police officers and other state employees?

Base: Total target population

Data is in %

Chart 40: Ranking of the severity of problem that impose corruption at high or lower level

Fewer citizens than in 2017 believe that there can be effective mechanisms to fight corruption, although a large number still puts faith in stricter legal penalties and impartial application of rules. However, while three quarters of respondents in 2017 thought that stricter legal penalties could be the most effective method to fight corruption, today only a little more than half of the citizens believe in that. The number of those who think that the problem of corruption could be solved by impartial application of laws to all citizens has also dropped – from two thirds to less than a half. Similar decline can be observed in the citizen's faith in the power of other mechanisms, such as wage increases, raising awareness of the harmfulness of corruption, greater control of the public sector bodies by NGOs, etc.



And what would you say, which of the following activities would be the most successful in solving the problem of corruption in the place you live? Please rank the three most effective ways from the first to the third.

Base: Total target population

Data is in %

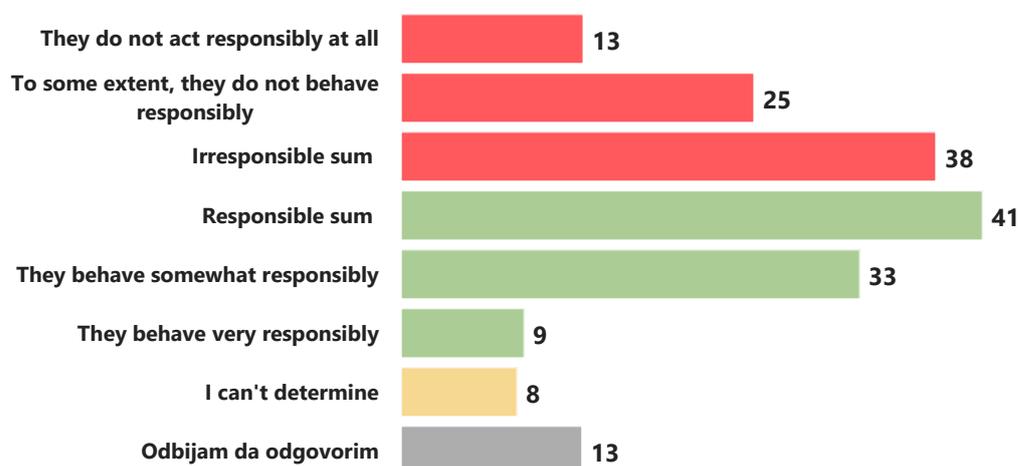
Statistically significantly less than in 2017

Statistically significantly more than in 2017

Chart 41: Measures to eradicate corruption

Responsibility and transparency of municipalities

The citizens are divided in their opinions on accountability of the municipalities they live in. Around two-fifths of the respondents say that the heads of municipal administrations behave accountably, while a slightly lower percentage thinks the opposite.



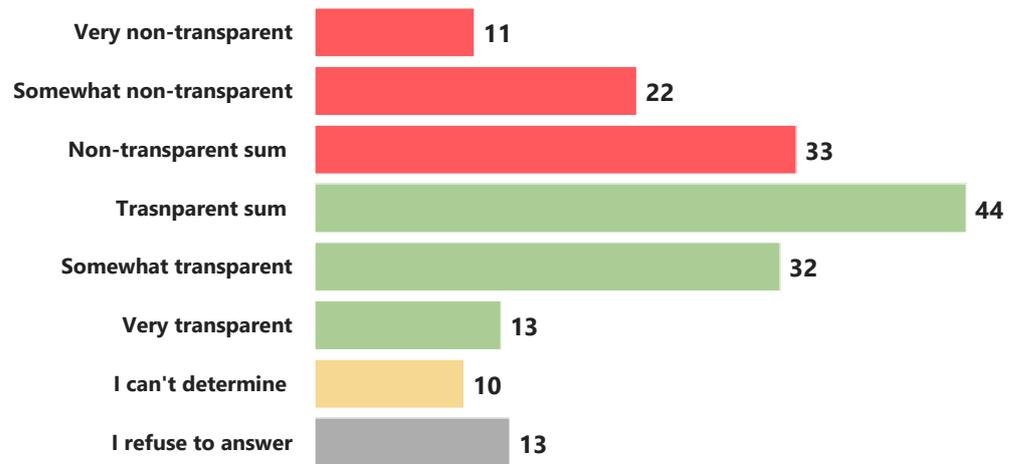
To what extent do the heads of the municipal administration of the municipality in which you live behave responsibly towards the citizens and the public interest?

Base: Total target population

Data is in %

Chart 42: Accountability of managers of local administration

More than two-fifths of the citizens hold positive views of the transparency of work of the municipality they live in, while one third thinks that that their local administration is not transparent.



How transparent are the local administration of the municipality in which you live, in your opinion? To what extent can you easily get all the necessary information through the site, by contacting the municipal services, etc.

Base: Total target population Data is in %

Chart 43: Transparency of municipalities

When evaluating local administrations, it is noticeable that citizens in the south of Montenegro have a much more critical attitude than those living in the northern and central regions.

FINAL REMARKS

The research findings gathered in the *Transparency Index of Montenegrin Municipalities* reveal an acute need to improve transparency in the work of local self-governments in Montenegro.

Out of a total of 100 points on indicators measuring transparency in various categories of key importance for the public, the Montenegrin municipalities scored on average 40.76 points in 2019. Even the two most transparent municipalities - Podgorica and Bijelo Polje - only scored slightly over a half - 58 points.

Comparing municipalities from different regions of the country, it can be noted that the South leads with an average score of 43.40, followed by the Central region with 41.16, and the North with 38.42 points.

It should be noted that a comparison between municipalities in which the national ruling coalition is in power and those in which the opposition holds the office reveals practically no difference in the degree of transparency. The average for the municipalities led by the opposition is 40.80 compared to 40.78 points for those led by the ruling coalition.

The size of the territory or population of the municipality has no impact on the degree of transparency.

Out of the documents deemed essential for municipal transparency, and in most cases explicitly required by law, none of the surveyed municipalities had the following: information on the votes of individual councillors during 2019; the Final Account of the Budget for 2019; a report or information on the number of submitted and processed corruption complaints in 2019; reports on implementation of the Integrity Plan and Local Anti-Corruption Plan for 2019; set office hours for citizens' contact with the mayor/president of the municipality; reports on the work of local self-government for 2019; and information on the allocation of funds to the media.

The issue of transparency of municipalities is often underestimated, but it is highly important not only for effective fight against corruption, but also for the monitoring of public policies at the local level and improving the services that municipalities provide to the citizens.

The *Transparency Index of Montenegrin Municipalities* can be a roadmap for those municipalities that want to improve their openness to stakeholders. The future measurements will show just how much the Montenegrin municipalities are committed to it.

