

## PAR Monitor Report Serbia

# PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT

2024/2025



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## ABOUT WEBER 3.0

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

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

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



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



## ACKNOWLEDGEMENTS

As in the case of the previous editions of the National PAR Monitor reports, published for 2017/2018, 2019/2020 and 2021/2022, special acknowledgements go to the members of the WeBER Platform and the National Working Group in Serbia, as well as the other stakeholders in Serbia that shared their experiences through interviews, thus immensely contributing to the quality of this report. They are not individually identified in this report to protect their anonymity.

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<sup>1</sup> A joint initiative of the European Union and the OECD.

## EXECUTIVE SUMMARY

*The assessment of the transparency, openness and meritocracy of public service and human resource management focuses on five critical aspects - 1) transparency of statistics and reports on civil service, 2) transparency of temporary hiring in the civil service, 3) transparency and merit principle of recruitment process, 4) merit based selection and protection of top managers from undue political influence, and 5) transparency and clarity of information on the civil service remuneration. The first aspect examines the availability of statistics or reports that cover civil service structure and key elements of civil service policy and HRM. The aspect of temporary hiring focuses on conditions and limitations for temporary hiring, while also examining the application of merit-principle and the openness and transparency of the hiring procedure. The aspect devoted to the recruitment process focuses on accessibility of vacancy announcements, existence of administrative burden, equal opportunities for external candidates in the application process, institutional support to applicants, transparency of outcomes, and citizens' perception on the meritocracy of recruitment. When it comes to the top managers in the civil service, the emphasis is placed on merit-based nature of recruitment and appointment practices and the use of objective dismissal criteria, as well as on limitations on acting appointments, the extent to which appointments are protected from political influence in practice, and the competitiveness of procedures. Finally, the last aspect is devoted to transparency and clarity of the civil service remuneration system and the existence of citizen-friendly presentations on its main aspects. Findings of this report reflect the period since the publication of the PAR Monitor 2021/2022, starting from the second half of 2022, and until the end of 2024.<sup>2</sup>*

Transparency of basic information on the civil service is neither recognised as a strategic objective within Serbia's PAR strategy nor mandated by the existing legal framework. The most relevant laws in the area - Law on the State Administration, and the Law on Civil Servants (CSL) - contain no provisions on publishing statistical data on the civil service structure. The Law on Free Access to Information of Public Importance obliges public authorities to publish Information Booklets, but these only require details on heads of internal organisational units, not broader civil service system data. Examples of Republic Geodetic Authority, Ministry of Culture and Ministry of Finance represent some transparency initiatives, but not sufficient for gaining substantive insights into

<sup>2</sup> For 2022, only developments not captured by the PAR Monitor 2021/2022 are included.

the system and its core features. Moreover, publicly available reports on key elements of civil service policy<sup>3</sup> cover only two topics - trainings and partially disciplinary responsibilities and ethics and integrity issues. Interviews with key informants revealed additional challenges: some reports, such as those on staff outflow and performance appraisals, are not made public; those reports often contain repetitive content and their utility is additionally reduced by a lack of in-depth data analytics. Overall, even when data is produced, its limited accessibility, inconsistent publishing, limited coverage and analysis undermine its potential.

Temporary hiring in Serbia's state administration is only partially regulated and often misused. The CSL sets grounds and duration for fixed-term employment, while the Budget System Law (BSL) introduces percentage limits. However, contracted staff outside the civil service regime are only covered by the Labour Law. Additionally, the law does not limit the number of renewals for temporary engagements, which allows long-term temporary employment without open competition. Recruitment procedures are only partially transparent: in most cases of temporary engagements (e.g., replacements, cabinet staff, acting managers, interns), hiring of civil servants can occur without competition, based solely on one verified competence. Public competitions apply only in limited cases of hiring civil servants temporarily, and even then, with exceptions, while rules for hiring contracted staff are not regulated by the CSL and basic legal foundations are set by the Labour Law only. Transparency is further weakened as public competitions for temporary engagement of civil servants have been repeatedly postponed until 2026. Empirical data from five sample institutions show that temporary staff often exceed the 10% legal cap, indicating weak enforcement of BSL. Key informants indicate widespread opacity, a lack of reporting, and misuse of temporary contracts to circumvent recruitment procedures. Overall, temporary hiring remains insufficiently limited and prone to abuse, undermining merit-based recruitment and accountability.

The Serbian civil service legal framework comprehensively covers the aspect of recruitment, but its implementation leaves important gaps. The PAR Strategy 2021–2030 outlines ambitions to strengthen merit-based hiring, with targeted measures (such as improving competence assessment tools and supporting the High Civil Service Council), but lacks broader commitments on openness and transparency. Legislation ensures nationwide advertising, and basic transparency through publication of shortlists and scores, but annulment decisions are not published, and detailed reasoning for candidate selection remains inaccessible. Vacancy announcements are broadly available, though rarely shared via social media, and bureaucratic style in which they are presented limits accessibility

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<sup>3</sup> These include planning, recruitment, performance appraisal, career development (promotions and demotions), professional development (trainings), remuneration (salaries), disciplinary responsibility and ethics and integrity issues and measures.

for potential applicants. Application requirements impose minimal burdens, with authorities obliged to collect most documents ex officio, but incomplete applications are automatically rejected, creating inflexibility. No disproportionate conditions were imposed in the reviewed sample competitions, supporting equal access in principle. Still, gaps in transparency persist, particularly regarding unpublished annulment decisions and the absence of reasoning behind results. Key informants confirm that undue influence and advantages for those previously hired in civil service undermine meritocracy, while public perception surveys reveal strong distrust: only a quarter of citizens believe recruitment is merit-based, while large majorities perceive personal and political connections as decisive.

The PAR strategic framework establishes a comprehensive agenda for strengthening the professionalism of civil service top management, with activities ranging from competency-based recruitment, career development to establishing a network of top managers. The CSL and the relevant bylaws provide a formal basis for merit-based recruitment and limits acting appointments, regulate vacancy announcements, competency testing, and the role of selection committees. However, the final appointment stage remains vulnerable to political influence, as the Government's Rules of Procedure introduce a political layer, the Government Personnel Commission, outside the civil service framework, capable of overruling merit-based proposals. Dismissal provisions also contain vague criteria and allow abolishment of top management posts through internal reorganisation, creating risks of arbitrary removal. In practice, the reliance on acting appointments has become entrenched: between April 2024 and May 2025, 81% of appointments to top management positions were acting, these appointments are often extended beyond legal limits and positions filled by non-civil servants, undermining both professionalism and integrity. Completed competitions show very low candidate interest with average of fewer than two eligible applicants per top management vacancy. Key informants underline pervasive political interference, weak competition, and the misuse of acting appointments as the greatest barriers to depoliticisation. They recommend stricter safeguards, automatic extensions of tenure of top managers until new competitions are completed, and reconsideration or abolition of acting appointments altogether. Overall, the system is perceived as politicised, unstable, and insufficiently merit-based, requiring robust reforms to secure professional, independent top civil service management.

The remuneration of civil servants in Serbia is regulated by the Law on the Salaries of Civil Servants and General Employees, which sets coefficients for ranks, pay groups, and grades, and prescribes salary supplements, their conditions, and rules for combination. The Law does not envisage performance-based bonuses, limiting discretionary awards. Data availability increased, as the Ministry of Finance published a report on salaries for June 2025, offering



average, median, minimum, and maximum salary data by rank and education level, though it did not provide gender pay gap or other gender-sensitive data. In parallel, a citizen-friendly tool, *salary calculator*, available on the website of the Human Resource Management Service (HRMS), made salary information more accessible by allowing users to estimate potential earnings based on the selected state administration body, rank, and pay grade. Despite these developments, vacancy announcements still omit salary details for advertised positions, as there is no legal obligation to disclose them. Key informants view the system as insufficiently clear or transparent despite the general availability of information in legal acts such as on salary coefficients, stressing the need for data that is both accessible and easy to understand. While the salary calculator was highlighted as good practice, key informants called for regular publication of user-friendly statistics to meet standards of transparency and clarity.

The recommendations from this monitoring cycle are devoted to strengthening the overall transparency of the civil service system by ensuring that comprehensive annual reports are regularly produced and published, covering all key aspects of the system, and that statistical data is made available in open format. A unified policy and legal framework are proposed to ensure transparent and merit-based recruitment across all categories of staff in the state administration, with additional focus on defining clear rules for hiring contracted staff, in order to prevent misuse. Recommendations also call for allowing applicants to correct incomplete applications, ensuring salary information is included in vacancy announcements and publishing annulled competition decisions with reasoning. When it comes to the aspect of senior civil service, proposed reforms include limiting the influence of the Government Personnel Commission over senior civil service appointments and ending the practice of excessive and prolonged acting positions by filling vacancies through competitions. Finally, recommendations call for publication of data on competitions, appointments, and dismissals of senior civil servants.

## LIST OF ABBREVIATIONS AND ACRONYMS

|           |  |
|-----------|--|
| BSL       | Budget System Law  |
| CS        | Civil Servant  |
| CSL       | Civil Servants Law   |
| CSO       | Civil Society Organisations                                  |
| CPR       | Central Personnel Registry                                   |
| DMPD      | Direction for Measures and Precious Metals                   |
| FAQ       | Frequently Asked Questions                                   |
| FOI       | Freedom of Information Request                               |
| HCSC      | High Civil Service Council                                   |
| HRMIS     | Human Resource Management Information System                 |
| HRMS      | Human Resource Management Service                            |
| MAFW      | Ministry of Agriculture, Forestry and Water Management       |
| MIT       | Ministry of Information and Telecommunication                |
| MoE       | Ministry of Education  |
| MPALSG    | Ministry of Public Administration and Local Self-Government  |
| NAPA      | National Academy for Public Administration                   |
| PAR       | Public Administration Reform                                 |
| ReSPA     | Regional School of Public Administration                     |
| RoP       | Rules of Procedure   |
| SCS       | Senior Civil Servants  |
| SIGMA     | Support for Improvement in Governance and Management         |
| TA        | Tobacco Administration                                       |
| WeBER 3.0 | Western Balkan Enablers for Reforming Public Administrations |

# **I. WeBER PAR Monitor: What we monitor and how?**

## **I.1 WeBER's approach to monitoring PAR**

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

In line with WeBER's focus on the region's EU accession process, once the SIGMA Principles of Public Administration were revised in 2023, the WeBER PAR Monitor methodology was also redesigned in 2024, building on the Principles,<sup>4</sup> and on SIGMA Methodology,<sup>5</sup> and complementing the monitoring by SIGMA by providing additional observations focused on transparency, inclusiveness, openness or other aspects of state administrations' work depending on PAR area in question. This revision helps maintain the focus of WeBER's recommendations on EU-compliant reforms, thus guiding the governments in the region towards successful EU accession and future membership. The main changes in the revised PAR Monitor methodology are briefly listed below.<sup>6</sup>

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

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

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

**Table 1: Main changes in the PAR Monitor methodology**

## **STRUCTURE**

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

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

## **DATA SOURCES**

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

## **PAR MONITOR REPORTING**

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

## I.2 Why and how WeBER monitors the “Public Service and Human Resource Management” area

A professional, transparent, and merit-based civil service is a cornerstone of public administration that works in the public interest. These principles are essential for safeguarding professionalism, integrity, and public trust in institutions. WeBER’s monitoring focuses on how these principles are applied in practice, beyond what is formally guaranteed in laws and strategies: from the accessibility and inclusiveness of vacancy announcements to the transparency of recruitment outcomes and the public availability of data on key aspects of the civil service. These issues directly affect the quality, responsiveness, and trustworthiness of public institutions. When recruitment is politicised, rules are unclear, or data is withheld, citizens are left with an administration that serves political interests rather than public needs. The monitoring of this area supports evidence-based advocacy for a more competent, accountable, and depoliticised civil service - one that citizens can trust to serve the public interest.

Monitoring in **the Public Service and Human Resource Management area** is based on four SIGMA Principles in this area:



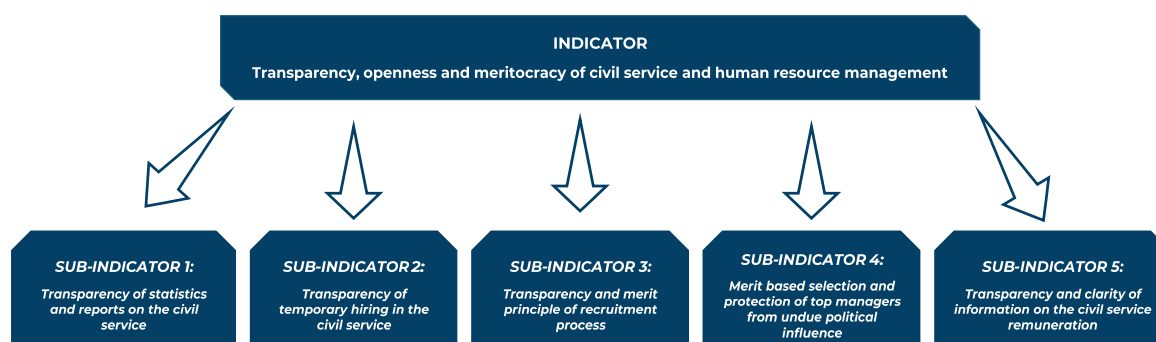
**Principle 8:** The employment framework balances stability and flexibility ensure accountability of public servants and protects them against undue influence and wrongful dismissal

**Principle 9:** Public administration attracts and recruits competent people based on merit and equal opportunities

**Principle 10:** Effective leadership is fostered through competence, stability, professional autonomy and responsiveness of accountable top managers

**Principle 11:** Public servants are motivated, fairly and competitively paid and have good working conditions

These Principles are assessed from the perspective of availability of all relevant information on different key areas of the civil service, while also examining the extent to which merit-based recruitment is present within the system, including the procedure for temporary hiring, and merit-based appointment of top managers. A focus on transparency and openness seeks to determine the extent to which relevant authorities publish information which helps interested public gain insight into crucial aspects of the system and the extent to which civil service is open to external candidates when recruiting new employees.



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

The **first sub-indicator** focuses on the existence of statistics and reports that cover important data and key policy areas of the civil service system (such as recruitment, career development, and such). Monitoring of strategy and policy, legislation and practice aspects is performed by combining qualitative analysis of strategic documents, regulations and publicly available official data. For the assessment of outcomes and impact, researchers conduct three key informants' interviews with non-state actors who possess significant expertise in the area and/or experience participating in the analysed processes.

**Table 2: Indicator elements under sub-indicator 1**

| Indicator element: number and title   | Type                       |
|---|----------------------------|
| E 1.1 Strategic framework envisages improvements in transparency of basic information on civil service                          | Strategy and policy        |
| E 1.2 Regulations stipulate that data on civil service and employees in the central state administration are publicly available | Legislation                |
| E 1.3 The Government regularly publishes reports pertaining to the civil service  | Practice in implementation |
| E 1.4 Published reports include data on employees other than civil servants in the central state administration                 | Practice in implementation |
| E 1.5 Published reports segregate data based on gender, age, and education  | Practice in implementation |
| E 1.6 Civil service data is available in open format(s)   | Practice in implementation |

|  |                            |
|--|----------------------------|
| E 1.7 The government comprehensively reports on the key elements of civil service policy and HRM     | Practice in implementation |
| E 1.8 Key non-state actors consider reports on civil service policy as transparent and comprehensive | Outcomes and impact        |

The **second sub-indicator** assesses openness and transparency of temporary hiring in the civil service, while also looking into the application of the merit principle and the limitations to the use of temporary hiring.

Monitoring of this sub-indicator is based on the review of regulations and websites of relevant institutions, as well as official documents and data obtained through FOI requests. The assessment of the practice-type elements is conducted on a sample of most recently completed competitions for hiring temporary staff in five different central state administration bodies, i.e. 5 competition procedures for hiring fixed-term civil servants (one per body) and 5 competition procedures for hiring contracted staff (one per body), resulting in 10 procedures observed in total. For the assessment of outcomes and impact, as in the first sub-indicator, researchers conduct interviews with key informants.

**Table 3: Indicator elements under sub-indicator 2**

| Indicator element: number and title  | Type                       |
|--|----------------------------|
| E 2.1 Regulations stipulate conditions and limitations for hiring temporary staff                      | Legislation                |
| E 2.2 Regulations stipulate openness and application of merit-principle when hiring temporary staff    | Legislation                |
| E 2.3 Procedure for hiring temporary staff is open and transparent                                     | Practice in implementation |
| E 2.4 Temporary hirings are limited in practice  | Practice in implementation |
| E 2.5 Key non-state actors consider the use of temporary hiring as transparent, limited and purposeful | Outcomes and impact        |

The **third sub-indicator** examines the transparency of the recruitment process and the application of the merit-principle. Specifically, the assessment focuses on the accessibility of vacancy announcements, the inclusiveness and fairness of procedures for external candidates, the level of institutional support to applicants and of any administrative burden, as well as the availability of information on selection outcomes, including the annulment of procedures.

Monitoring of strategy and policy, legislation and practice aspects is performed by combining various data sources to maximise reliability of results. It includes

qualitative analysis of strategic documents, legal acts and official data that is publicly available or obtained from responsible institutions using FOI requests. The analysis of Practice type elements under this sub-indicator is conducted on the same five ministries/central state administration bodies sampled under sub-indicator 2. For the outcomes and impact assessment, researchers conduct three key informants' interviews. Unlike the first two sub-indicators, researchers also use public perception survey results to assess outcomes and impact within this sub-indicator. The public perception survey was conducted specifically for the purposes of the 2024/2025 PAR Monitor cycle.

**Table 4: Indicator elements under the sub-indicator 3**

| Indicator element: number and title   | Type                       |
|---|----------------------------|
| E 3.1 Strategic framework envisages improvements of openness, transparency and merit principle of the recruitment process                     | Strategy and policy        |
| E 3.2 Regulations stipulate openness, transparency, and merit principle of the recruitment process  | Legislation                |
| E 3.3 Vacancy announcements for public competitions are made broadly publicly available   | Practice in implementation |
| E 3.4 Vacancy announcements for public competitions are presented in a way to motivate and attract external candidates                        | Practice in implementation |
| E 3.5 Responsible institution provides support and guidance to applicants   | Practice in implementation |
| E 3.6 There are no unreasonable barriers for external candidates which make public competitions more easily accessible to internal candidates | Practice in implementation |
| E 3.7 The application procedure imposes minimum administrative/paperwork burden on candidates   | Practice in implementation |
| E 3.8 Candidates can supplement missing documentation within a reasonable timeframe   | Practice in implementation |
| E 3.9 Decisions and reasoning of the selection panels are made publicly available, with due respect to the protection of personal information | Practice in implementation |
| E 3.10 Information about annulled public competitions, including reasoning for the annulment, is made publicly available                      | Practice in implementation |
| E 3.11 Key informants consider recruitment into civil service as transparent and merit-based  | Outcomes and impact        |



|  |                     |
|--|---------------------|
| E 3.12 Citizens' perception of merit-based civil service recruitment                               | Outcomes and impact |
| E 3.13 Citizens' perception of the influence of personal connections in civil service recruitment  | Outcomes and impact |
| E 3.14 Citizens' perception of the influence of political connections in civil service recruitment | Outcomes and impact |

The **fourth sub-indicator** focuses on the merit-based selection of top managers and the existence of mechanisms for their protection from undue political influence. Specifically, WeBER examines if the recruitment and appointment practices for civil service top management are based on merit, by looking into the limitations on acting appointments, use of objective dismissal criteria, and the extent to which appointments are protected from political influence in practice.

Monitoring relies on the review of strategy and policy, legislation, institutional websites and official documents, supplemented by data obtained through FOI requests sent to the responsible institutions. The analysis of Practice type elements under this sub-indicator is conducted on the same five ministries/central state administration bodies sampled under sub-indicator 2. For the assessment of outcomes and impact, researchers conduct key informants' interviews, while public perception survey data is not used.

**Table 5: Indicator elements under the sub-indicator 4**

| Indicator element: number and title  | Type                       |
|--|----------------------------|
| E 4.1 Strategic framework envisages strengthening of professionalism of the civil service top management   | Strategy and policy        |
| E 4.2 Regulations stipulate competitive, merit-based procedures for the recruitment of civil service top management                                | Legislation                |
| E 4.3 Regulations stipulate that acting appointments to top management positions are only made from within the civil service, for a limited period | Legislation                |
| E 4.4 Regulations stipulate objective criteria for the termination of hiring of top management positions   | Legislation                |
| E 4.5 Existence of procedures on appointments to top management positions outside of the scope of the civil service legislation                    | Legislation                |
| E 4.6 The merit-based recruitment for top management positions is applied in practice  | Practice in implementation |
| E 4.7 Acting appointments are, in practice, only made from within the civil service  | Practice in implementation |

|  |                            |
|--|----------------------------|
| E 4.8 Ratio of eligible candidates per top managerial-level vacancy  | Practice in implementation |
| E4.9 Share of non-merit-based appointments to top management positions   | Practice in implementation |
| E4.10 Key non-state actors consider that the selection and appointment process of top managers is merit-based and that they are protected from undue political influence | Outcomes and impact        |

Finally, the **fifth sub-indicator** examines the transparency and clarity of the civil service remuneration system, primarily focusing on the availability of information on salaries and its citizen-friendliness.

Monitoring of this sub-indicator is based on the review of regulations and websites of relevant institutions. For the assessment of outcomes and impact, researchers conduct key informants' interviews.

**Table 6: Indicator elements under the sub-indicator 5**

| Indicator element: number and title   | Type                       |
|---|----------------------------|
| E 5.1 Regulations define a simply structured remuneration system  | Legislation                |
| E 5.2 Information on civil service remuneration system is available online                                  | Practice in implementation |
| E 5.3 Citizen friendly explanations or presentations of the remuneration information exist                  | Practice in implementation |
| E 5.4 Key informants consider information on the civil service remuneration system as transparent and clear | Outcomes and impact        |

## II. TRANSPARENCY, OPENNESS AND MERITOCRACY OF CIVIL SERVICE AND HUMAN RESOURCE MANAGEMENT

This section presents the assessment results for Serbia. Each sub-section presents the results for one sub-indicator (five in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, legislation and institutional framework, then moving to the practice in implementation, and ending with outcomes and impact. Each sub-indicator assessment concludes with the graph showing the awarded points.

The graph below displays the overall results for the Public Service and Human Resource Management area in Serbia, measured on a scale from 0 to 100 points.

Transparency, openness and meritocracy of civil service and human resource management (score 0-100)



## II.1 Transparency of statistics and reports on civil service

**Principle 8: The employment framework balances stability and flexibility ensure accountability of public servants and protects them against undue influence and wrongful dismissal**

***Awarded points per elements in sub-indicator 1: Transparency of statistics and reports on civil service <sup>7</sup>***

| Indicator elements  | Element type               | Score         |
|---|----------------------------|---------------|
| E 1.1 Strategic framework envisages improvements in transparency of basic information on civil service                          | Strategy and policy        | 0/0.5         |
| E 1.2 Regulations stipulate that data on civil service and employees in the central state administration are publicly available | Legislation                | 0/1           |
| E 1.3 The Government regularly publishes reports pertaining to the civil service  | Practice in implementation | 0/3           |
| E 1.4 Published reports include data on employees other than civil servants in the central state administration                 | Practice in implementation | 0/3           |
| E 1.5 Published reports segregate data based on gender, age, and education  | Practice in implementation | 0/3           |
| E 1.6 Civil service data is available in open format(s)   | Practice in implementation | 0/3           |
| E 1.7 The government comprehensively reports on the key elements of civil service policy and HRM                                | Practice in implementation | 1/3.5         |
| E 1.8 Key non-state actors consider reports on civil service policy as transparent and comprehensive                            | Outcomes and impact        | 0/2.5         |
| <b>Total score for sub-indicator 1</b>  |                            | <b>1/19.5</b> |

<sup>7</sup> The first sub-indicator focuses on the following SIGMA sub-principles: The government has a clear policy on public service, and the political-level responsibility for the area is established; A central body, sufficiently empowered, effectively leads and co-ordinates the human resource management (HRM) system for the public service, provides support to public administration bodies, and monitors implementation; Public administration bodies have sufficient capacities for professional HRM; An effective information system supports HRM processes and provides data allowing for evidence based public service policy.

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*Since the previous WeBER monitoring cycle, there have been no notable improvements in the availability of information and statistics on the civil service system. Comprehensive reports are still not published, although some statistics are sporadically available. Moreover, SIGMA noted that the human resource management information system (HRMIS) was recently developed but has not yet been made available to public administration bodies.<sup>8</sup> In December 2024, the Human Resource Management Service (HRMS), as the authority responsible for the system, launched training sessions for public administration bodies on data entry into the HRMIS.<sup>9</sup> There is no information on when the system will become fully operational, although it could help address the lack of publicly available data on the civil service, as it should enable easier and faster production of reports.*

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Enhancement of transparency of basic information on the civil service is not included in the PAR planning documents, indicating that transparency concerns are not recognised as a strategic objective. The PAR Strategy and its Action Plan define activities aimed at improving the aspect of recruitment, career management, and professional development, but none of the measures and activities cover the issue of transparency of information on these aspects. Moreover, there is no legal obligation for state administration bodies to publish data on the civil service structure. Specifically, the Law on the Civil Service and the Civil Servants Law (CSL) do not address this aspect at all. On the other hand, the Law on Free Access to Information of Public Importance prescribes an obligation for public authorities to publish Information Booklets which contain basic information on the public authority. However, neither the Law nor the Instructions for Producing and Publishing the Information Booklet prescribe the obligation to publish information on employees.<sup>10</sup> This Law only requires public administration bodies to provide information on the names, contacts, and function descriptions for heads of internal organisational units. The lack of explicit strategic and legal mandates makes it unlikely that the issue of data transparency will be addressed soon.

Such a deficiency of strategic guidance and legal provisions is evident in practice, as reports covering the entire scope of civil service are not publicly available, making it harder for the interested parties to easily access credible information. This refers not only to general data, such as the number of employees or state administration bodies and such, but also to data disaggregated by specific criteria that would enable deeper insights and provide a basis for further analysis. Such criteria can include employees' gender, age, education, number of employees

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<sup>8</sup> SIGMA/OECD, *Public Administration in Serbia 2024: Assessment against the Principles of Public Administration*, 2025, pp. 44. Available at: <https://tinyurl.com/3f9ua2pt>

<sup>9</sup> See more at: <https://tinyurl.com/2vj856vp>

<sup>10</sup> Law on free access to information of public importance, Official Gazette No. 105/2021. Available at: <https://tinyurl.com/4ub5s66w>. Instructions for producing and publishing the Information Booklet, Official Gazette No. 10/2022, available at: <https://tinyurl.com/mdnx5zus>.

per civil service ranks/title, number of employees per central state administration body, recruitment, staff turnover, data on employees other than civil servants in the central state administration (general state employees, contracted staff, temporary employment), and other. The absence of comprehensive reporting practices impedes in-depth analysis and identification of systemic issues or progress trends.

Although data on the entirety of the civil service is not available, there are individual examples of state administration bodies publishing statistics and reports. Such an example can be found within the Information Booklet of the Republic Geodetic Authority, which provided gender segregated data on their employees, further broken down by type of engagement – full-time, fixed-term and contracted staff - and the level of education.<sup>11</sup> Another example is the Information Booklet of the Ministry of Culture, which provides data on the number of employees per rank and employees hired outside of the scope of the civil service regime, i.e., under the general labour regulations.<sup>12</sup> Furthermore, the Ministry of Finance has published a report on the salaries per sectors and typical job positions for June 2025. This report contains data on average salaries per civil service ranks and typical job positions, number of employees per education level (including salary rank) and the age structure.<sup>13</sup> Although commendable, these examples are exceptions rather than standard practice. The sporadic publication of statistics and reports does not provide system-wide insights, nor can it be ensured that these bodies will continue this practice.

Furthermore, reports covering key elements of civil service policy<sup>14</sup> are also scarce. Namely, only two topics are regularly publicly reported on, on a yearly basis: trainings, and (partially) disciplinary responsibilities and ethics and integrity issues. Regarding the former, the National Academy for Public Administration (NAPA) publishes annual reports containing the number of trainings per topic, participants per session, number of sessions by delivery method, and results of evaluations conducted by the participants.<sup>15</sup> Regarding the later, the High Civil Service Council (HCSC) produces an annual report on the compliance of central administration bodies with the Code of Conduct of Civil Servants.<sup>16</sup> However, the report assesses disciplinary and integrity issues in terms of compliance with the Code and thus addresses only a narrow segment of the wider integrity topic, as breaching the Code of Conduct is considered a minor breach of the labour relations. As previously stated, such reporting practices, limited to these two reports, fail to capture the full scope of the system. Furthermore, the limited

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11 Available at: <https://tinyurl.com/4emkd8df>

12 Available at: <https://tinyurl.com/264frz92>

13 Available at: <https://tinyurl.com/ajhyky5>

14 These include planning, recruitment, performance appraisal, career development (promotions and demotions), professional development (trainings), remuneration (salaries), disciplinary responsibility and ethics and integrity issues and measures.

15 Available at: <https://tinyurl.com/3cuwm694>

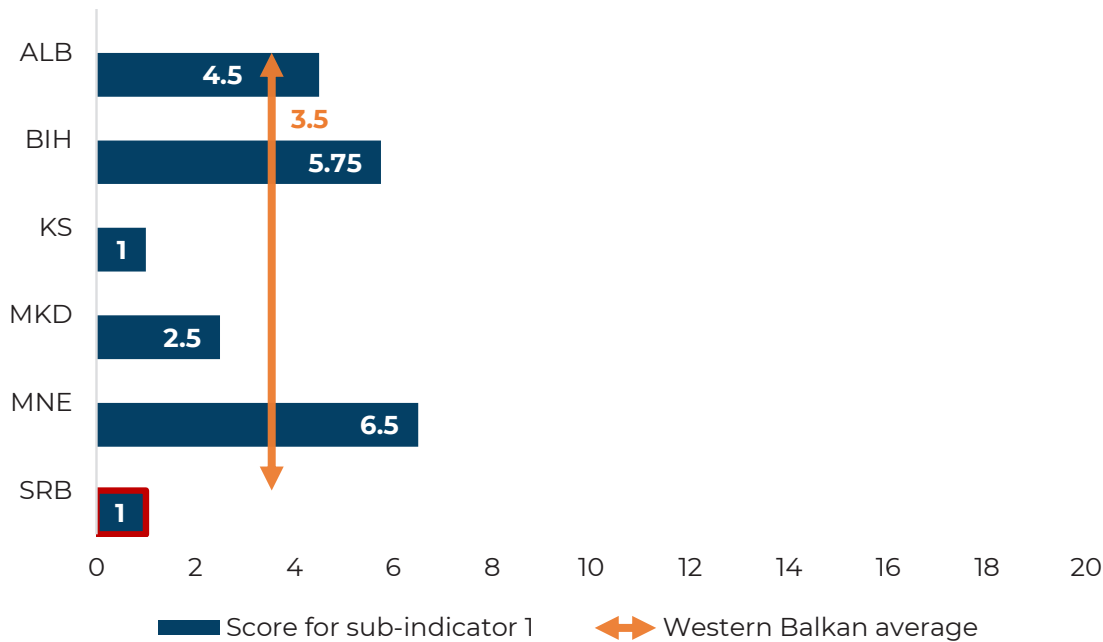
16 Available at: <https://tinyurl.com/bdf4r24b>

analytical depth of these reports reduces their usefulness for stakeholders seeking for more meaningful insights.

Finally, key informants do not agree that the reports on the civil service are transparent and comprehensive.<sup>17</sup> The insights gained from the interviews suggest that some reports are regularly produced, but not made available to the public, such as reports on recruitment, annual staff outflow and performance appraisals. Key informants noted that these reports are well-structured and contain relevant data, but stressed the need for improvement, primarily regarding the publication of these reports, but also regarding the key findings – content is often repeated from year to year, and deeper analytics is lacking. Furthermore, one key informant highlighted the importance of having an information system, such as HRMIS, which could enable better data coverage and analysis. These findings suggest that even when quality reports are produced, their limited accessibility and insufficient analytical depth undermine their potential impact on decision-making and formulating informed reform measures.

HOW DOES SERBIA DO IN REGIONAL TERMS?

**Sub-indicator 1:** Transparency of statistics and reports on civil service (maximum score 19.5)



<sup>17</sup> Researchers identified and interviewed relevant non-state actors with experience and knowledge in the field (key informants). Non-state actors are selected among representatives of civil society organisations, academia, professional organisations, media associations, investigative journalism outlets, or thematic experts. As a rule, three non-state actors were interviewed for all statements. Key informant interviews were held on May 30<sup>th</sup>, June 13<sup>th</sup> and July 2<sup>nd</sup>, 2025. Two key informants responded with fully disagree and one responded with tend to disagree to the statement “Publicly available reports and statistics on civil service are transparent.”. The ratio of responses per agreement scale was the same for the statement “Publicly available reports and statistics on civil service are comprehensive enough.”

## II.2 Transparency of temporary hiring in the civil service

**Principle 8: The employment framework balances stability and flexibility ensure accountability of public servants and protects them against undue influence and wrongful dismissal**

*Awarded points per elements in sub-indicator 2:  
Transparency of temporary hiring in the civil service <sup>18</sup>*

| Indicator elements   | Element type               | Score            |
|--|----------------------------|------------------|
| E 2.1 Regulations stipulate conditions and limitations for hiring temporary staff                      | Legislation                | 1/2              |
| E 2.2 Regulations stipulate openness and application of merit-principle when hiring temporary staff    | Legislation                | 0.25/1           |
| E 2.3 Procedure for hiring temporary staff is open and transparent                                     | Practice in implementation | -1/3.5           |
| E 2.4 Temporary hirings are limited in practice  | Practice in implementation | 0/3              |
| E 2.5 Key non-state actors consider the use of temporary hiring as transparent, limited and purposeful | Outcomes and impact        | 0/3              |
| <b>Total score for sub-indicator 2</b>   |                            | <b>0.25/12.5</b> |

Since the last WeBER monitoring cycle, there has been no resolution of the main issues connected to temporary hiring. Both the European Commission and SIGMA, identify significant issues with temporary hiring in the Serbian civil service. The European Commission notes that, while legislation provides for merit-based recruitment and dismissal, around 10% of civil servants are hired on a fixed-term basis without a competition or skills assessment.<sup>19</sup> SIGMA similarly observes that temporary employment is used excessively, often justified as responding to a temporary workload increase.<sup>20</sup> SIGMA highlights that staff planning has not been implemented since 2012 and has been replaced by case-by-case approvals through a special commission, which will remain in place

<sup>18</sup> The second sub-indicator focuses on the following SIGMA sub-principle: The public administration uses temporary employment in justified situations and within reasonable time limits.

<sup>19</sup> European Commission, Serbia Report 2024, pp. 27. Available at: <https://tinyurl.com/bd3mncwy>.

<sup>20</sup> SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration, pp. 44. Available at: <https://tinyurl.com/26pvjun3>.



*until the end of 2026.<sup>21</sup> Overall, both sources indicate that the legal framework and its implementation allow for widespread temporary hiring, limiting strategic workforce planning and undermining merit-based recruitment.*

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Conditions and limitations for temporary hiring in the Serbian public administration are partially regulated. CSL<sup>22</sup> prescribes specific grounds for fixed-term employment of civil servants (CS)<sup>23</sup> and limits the duration accordingly. The BSL<sup>24</sup> further restricts hiring by limiting the number of new permanent hires at 70% of turnover and by setting a ceiling of 10% of permanent employees for hiring of all temporary and contract-based employees in the public sector, with exceptions requiring Government's approval. However, conditions for contracted staff outside the merit-based civil service regime (such as service contracts, or other forms of temporary engagement) are not regulated by CSL, but the Labour Law regulates it in terms of duration, employment status, etc<sup>25</sup>. In addition, there are no legal limits on the number of contract renewals, either for fixed-term civil service posts or for other types of contracts regulated by labour regulations, enabling long-term temporary engagements that bypass competitive recruitment procedures. Overall, while there are formal limits on overall temporary employment in the civil service in terms of the allowed percentage of employees and on the duration of fixed-term engagement, the absence of clear regulation for all other contractual arrangements used by state administration bodies, and the lack of restrictions on the renewal of either fixed-term or contract-based hires significantly weaken safeguards against the abuse of temporary hiring practices.

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21 Ibid, pp. 52.

22 Civil Servants Law, Official Gazette No. 19/2025. Available at: <https://tinyurl.com/2wa4vwds>

23 Such as replacing an absent civil servant, temporary workload increases (up to six months), and cabinet. positions linked to an official's mandate.

24 Ar. 27k Budgetary System Law, Official Gazette No. 94/2024. Available at: <https://tinyurl.com/2mkywbs8>.

25 Labour Law, ar. 197-202.

**Table 7. Employment Contracts in the Public Administration:  
Types, Duration, and Legal Basis**

| <i>Type of temporary engagement</i>      | <i>Legal framework</i> | <i>Reason for engagement</i>  | <i>Duration</i>   |
|--|------------------------|---|---|
| <b>Civil service fixed-term position</b> | Civil Servants Law     | to replace an absent civil servant  | until the return of the absent civil servants                     |
|  |                        | due to the temporarily increased volume of work   | maximum of six months   |
|  |                        | at workplaces in the cabinet  | while the top managers' duty lasts                                |
|  |                        | for training trainees   | until traineeship ends  |
|  |                        | for the purpose of replacing a civil servant who was appointed in acting status   | while the duty of acting manager lasts                            |
|  |                        | for replacing a civil servant whose employment relationship is suspended due to an internship   | until traineeship ends  |
| <b>Service contract</b>                  | Labour Law             | carrying out tasks outside the employer's regular activities, which involve independently producing a specific item or performing certain physical or intellectual work | not limited - engagement lasts until the agreed task is completed |
| <b>Temporary and occasional contract</b> | Labour Law             | carrying out tasks within the employer's main activity  | 120 working days (max)  |

Procedures for temporary hiring in the Serbian civil service are only partially transparent and merit-based. The CSL prescribes different recruitment regimes depending on the grounds for fixed-term employment.<sup>26</sup> A fixed-term employment relationship may be established without an internal or public competition in the following cases: for replacing of an absent civil servant until their return; for positions in the cabinet for the duration of a public office; for replacing of a civil servant appointed as acting manager; or for replacement of a civil servant whose employment is suspended due to an internship. In these cases, hiring can be conducted with verification of only one

<sup>26</sup> Civil Servants Law, ar. 63.

competence by a manager. In some cases, candidates who have previously passed a public competition may be rehired without a new competition.<sup>27</sup> Public competitions will be mandatory from January 2026, but only for fixed-term employment due to a temporary workload increase or for training interns, and even then, only if such positions are included in the personnel plan.<sup>28</sup> Furthermore, the regulations allows successive fixed-term engagements of same civil servant due to temporary workload increases without repeating the competition procedure.<sup>29</sup> For contracted staff outside the civil service regime, recruitment procedures are not regulated, and the general Labour Law applies, which sets no transparency or merit-based criteria. Altogether, while certain categories of fixed-term civil service hirings are subject to open competition, significant exemptions (especially for contracted staff) undermine the overall transparency and competitiveness of temporary recruitment in the central state administration.

In practice, transparency and openness of temporary hiring procedures are practically non-existent. Although the CSL stipulates that fixed-term employment due to temporary workload increases or for training interns should follow as the result of public competition procedure, this provision applies from 1 January 2026, and has been repeatedly postponed, year after year. As a result, state administration bodies are currently not obliged to publicly announce vacancies for these positions. At the same time, since hiring of contracted staff outside the civil service regime is not legally subject to open and merit-based recruitment rules, information on these hiring practices is not systematically available. Consequently, the current temporary hiring practices fully lack transparency or openness.

Assessment of the scope of temporary hiring in practice was conducted on a sample of five central state administration bodies: Tobacco Administration (TA), Ministry of Education (MoE), Direction for Measures and Precious Metals (DMPD), Ministry of Information and Telecommunication (MIT), and Ministry of Agriculture, Forestry and Water Management (MAFW). Calculating the share of temporary employees relative to the total permanent workforce in each institution revealed substantial deviations - in all sampled bodies the share of temporary employees is higher than the prescribed cap of 10% set by the BSL, including fixed-term civil servants, service contracts, or other forms of temporary engagement. In some cases, the actual share of temporary staff significantly exceeds the legally permitted thresholds (see Table 8). Overall, the findings indicate that temporary hiring in practice often surpasses the legal limits, highlighting weak enforcement of regulations and a strong reliance on temporary staff beyond what is formally allowed.

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<sup>27</sup> Ibid.

<sup>28</sup> Ibid.

<sup>29</sup> Ibid.

**Table 8. Temporary employment in sampled central state administration bodies**

| <b>SAMPLE</b> | <b><i>Number of permanently hired CS</i></b> | <b><i>Number of temporarily hired CS</i></b> | <b><i>Number of employees on other types of contracts</i></b> | <b><i>Temporary Staff (% of Permanent Staff)</i></b> |
|---------------|--|--|---|--|
| <b>TA</b>     | 30   | 0  | 4   | 13   |
| <b>MoE</b>    | 295  | 7  | 70  | 26   |
| <b>DMPD</b>   | 87   |  | 12  | >14 <sup>29</sup>                                    |
| <b>MIT</b>    | 59   | 0  | 24  | 41   |
| <b>MAFW</b>   | 925  | 226  | 202   | 46   |

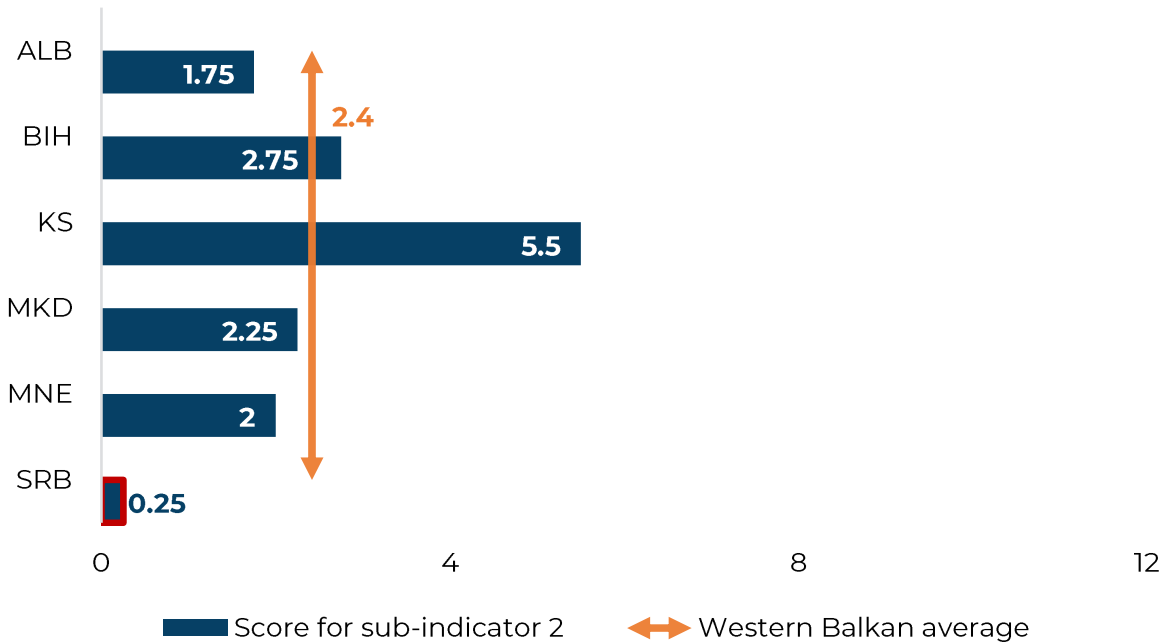
Key informants perceive the use of temporary hiring in civil service as largely non-transparent, insufficiently limited, and often lacking a clear purpose.<sup>31</sup> All three interviewees strongly emphasised the absence of public data and reporting on temporary employment, which prevents oversight and accountability. They highlighted that many temporary positions persist for years, and that certain contract types are sometimes used to circumvent formal competition procedures. While some legal provisions exist, implementation is frequently delayed or selectively applied, particularly in larger institutions. Opinions on purposefulness are mixed: one informant acknowledges that temporary hiring can serve workforce planning objectives, whereas the others point to systemic misuse and unfair advantages in subsequent recruitment processes. Overall, these perceptions indicate that temporary hiring practices are poorly monitored, inconsistently applied, and vulnerable to abuse, underscoring the need for stronger transparency and enforcement mechanisms.

30 DMPD official website contains information on both permanent and temporary staff combined, and information about 12 individuals employed on a temporary basis under various types of contracts. Based on this, we can conclude that the share of temporary employees clearly exceeds 14%. In fact, it is even higher, as the reported figure of 87 civil servants represents the combined total of both permanent and temporary staff.

31 Researchers identified and interviewed relevant non-state actors with expertise in the field (key informants). These actors were selected among representatives of civil society organisations, academia, professional associations, media organisations, investigative journalism outlets, and thematic experts. As a rule, three non-state actors were interviewed for all statements. Key informant interviews took place on May 30, June 13, and July 2, 2025. All key informants expressed full disagreement with the statement: “The use of temporary hiring in civil service, such as fixed-term employment of civil servants and hiring of contracted staff, is transparent.” Regarding the statement “The use of temporary hiring in civil service is, in practice, limited,” two informants tended to disagree, while one fully disagreed. On the statement “The use of temporary hiring in civil service is purposeful,” opinions were divided: KI1 tended to agree, KI2 fully disagreed, and KI3 tended to disagree.

HOW DOES SERBIA DO IN REGIONAL TERMS?

**Sub-indicator 2:** Transparency of temporary hiring in the civil service (maximum score 12.5)



## II.3 Transparency and merit principle of recruitment process

### Principle 9: Public administration attracts and recruits competent people based on merit and equal opportunities

#### *Awarded points per elements in sub-indicator 3: Transparency and merit principle of recruitment process<sup>32</sup>*

| Indicator elements  | Element type               | Score     |
|---|----------------------------|-----------|
| E 3.1 Strategic framework envisages improvements of openness, transparency and merit principle of the recruitment process                     | Strategy and policy        | 0.25/0.75 |
| E 3.2 Regulations stipulate openness, transparency, and merit principle of the recruitment process  | Legislation                | 1/1.25    |
| E 3.3 Vacancy announcements for public competitions are made broadly publicly available   | Practice in implementation | 2.25/3    |
| E 3.4 Vacancy announcements for public competitions are presented in a way to motivate and attract external candidates                        | Practice in implementation | 0/2       |
| E 3.5 Responsible institution provides support and guidance to applicants   | Practice in implementation | 3/3       |
| E 3.6 There are no unreasonable barriers for external candidates which make public competitions more easily accessible to internal candidates | Practice in implementation | 3/3       |
| E 3.7 The application procedure imposes minimum administrative/paperwork burden on candidates   | Practice in implementation | 4/4       |

<sup>32</sup> The third sub-indicator focuses on the following SIGMA sub-principles: The public administration analyses human resources (HR) and prepares and implements HR plans aligned with the budget to ensure the appropriate workforce size, mix of competencies, skills and expertise to fulfil its mission, considering both current and future needs; Public servants are recruited through transparent and open competitions, based on merit; Inclusive recruitment policies and practices support diversity and equal opportunities in the public administration; Recruitment is based on accurate job descriptions providing the required candidate profile (experience, knowledge, skills, competencies) for effective performance, reflected in vacancy announcements, along with work and salary conditions; Selection committees are composed of members qualified to perform the assessment of candidates against the job requirements, without any conflict of interest, and free from political influence; Selection methods provide fair and valid assessment of the experience, knowledge, skills and competencies necessary to perform the job and enable the selection of the most suitable candidates; Recruitment and selection processes are efficient, timely, user-friendly and supported by digital tools; Applicants are informed of recruitment decisions in a timely manner and have the right to ask for justification and appeal through administrative and judicial channels.

|   |                            |                |
|---|----------------------------|----------------|
| E 3.8 Candidates can supplement missing documentation within a reasonable timeframe   | Practice in implementation | 0/3            |
| E 3.9 Decisions and reasoning of the selection panels are made publicly available, with due respect to the protection of personal information | Practice in implementation | 4/4            |
| E 3.10 Information about annulled public competitions, including reasoning for the annulment, is made publicly available                      | Practice in implementation | 0/4            |
| E 3.11 Key informants consider recruitment into civil service as transparent and merit-based  | Outcomes and impact        | 0/2.5          |
| E 3.12 Citizens' perception of merit-based civil service recruitment  | Outcomes and impact        | 0.5/2          |
| E 3.13 Citizens' perception of the influence of personal connections in civil service recruitment   | Outcomes and impact        | 0/2            |
| E 3.14 Citizens' perception of the influence of political connections in civil service recruitment  | Outcomes and impact        | 0/2            |
| <b>Total score for sub-indicator 3</b>  |                            | <b>18/36.5</b> |

*There have been no significant developments since the last WeBER monitoring cycle. In its latest country report, the European Commission considered the regulatory framework for human resources management to be solid. While legislation provides for merit-based hiring and dismissal procedures, it grants considerable discretion to institutional managers in forming selection committees.<sup>33</sup> Similarly, SIGMA notes that recruitment is based on a competency model, employing a broad range of techniques to assess candidates' competencies, knowledge, and skills.<sup>34</sup> The competency framework is seen as relatively flat, distinguishing proficiency levels only for managerial positions. SIGMA positively notes the introduction of new initiatives to attract talent, such as the development of a user-friendly candidate portal, "Candidates' corner."*

The PAR Strategy 2021–2030 outlines the ambition to build a well-led, professional, motivated, and efficient public administration that upholds the merit principle and attracts competent staff. Although it lacks concrete measures focusing on improved openness and transparency of recruitment process, the Strategy contains clearly defined measures to enhance merit-based

<sup>33</sup> European Commission, Serbia Report 2024, pp. 27. Available at: <https://tinyurl.com/bd3mncwy>

<sup>34</sup> SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration, pp. 44. Available at: <https://tinyurl.com/26pvjun3>

recruitment, accompanied by a specific allocation of responsibilities. These include improving competency assessment tools, providing online training for selection committees, analysing overlaps in verification of competencies, and developing a competency framework with a roadmap for integration. Measures also target strengthening the capacity of the HCSC to apply competency-based selection methods. Overall, while the strategic framework provides targeted actions to strengthen the merit principle in recruitment, it falls short of addressing broader openness and transparency aspects in a measurable and responsibility-assigned manner.

The Regulation on Internal and Public Competition for Filling Vacancies in State Bodies<sup>35</sup>, together with the CSL, provides a comprehensive legal framework for using public competitions to fill vacancies, covering application procedures, candidate tracking, selection stages, selection committees' composition, assessment of candidates' competencies, and selection criteria and results. Openness of the public competition process is ensured by provisions requiring advertisement on the state body's website and notice board, the e-Government portal, the website and printed bulletin of the National Employment Service, and the HRMS website. Vacancies may additionally be advertised in daily newspapers, on employment portals, and in other media outlets. Transparency of selection outcomes is ensured through provisions on publication of list of candidates (under application codes) while the names of selected candidates are published on the announcing state body's and the HRMS's websites. However, when a competition is annulled (e.g., no candidates meet the criteria, no applications received, or no candidates participated), legal framework only requires that decisions are delivered to candidates in the process and not disclosed publicly. Overall, while the legal framework mostly ensures openness of competition procedures and publication of competition results, it falls short on mandating the public availability of annulment decisions, limiting full transparency.

Broad availability of vacancy announcements for executorial civil service positions in practice was assessed by reviewing vacancy announcements for the most recently completed public competitions in five central state administration bodies.<sup>36</sup> All analysed competition procedures met the minimum requirements for broad availability (see Table 9).<sup>37</sup> Use of social media is at its minimum: only the MIT vacancy announcement was advertised on HRMS's Facebook pages. Overall, the publication practices ensured sufficient accessibility of advertisements to applicants through multiple channels.

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35 Regulation on Internal and Public Competition for Filling Positions in State Bodies, Official Gazette No. 67/2021, Available on: <https://tinyurl.com/3dt6v4y2>

36 Same sample as above.

37 Wide public availability implies publication through at least 3 different advertising methods that are available throughout the country, including a single portal/website for all employment in the central state administration and social media.



**Table 9. Use of advertisement channels for recruitment**

| criteria   | sample |     |      |     |      |
|--|--------|-----|------|-----|------|
|  | TA     | MoE | DMPS | MIT | MAFW |
| <i>advertised through portal for all recruitments in civil service (HRMS webpage)</i>                                  | ✓      | ✓   | ✓    | ✓   | ✓    |
| <i>advertised through hiring bodies' social media</i>  | x      | x   | x    | ✓   | x    |
| <i>advertised through hiring bodies' website</i>   | ✓      | ✓   | ✓    | ✓   | ✓    |
| <i>advertised through additional means, such as periodic publication of advertisements of the NES, bulletin boards</i> | ✓      | ✓   | ✓    | ✓   | ✓    |

All job advertisements contained the necessary information,<sup>38</sup> but the format of informing was not always citizen-friendly. The texts of vacancy advertisements were mostly written in a bureaucratic style, with parts appearing to be copied directly from regulations. Their length, formal tone, and frequent use of technical jargon could discourage potential applicants unfamiliar with such terminology. Although the HRMS has published summaries highlighting key information in simpler language, these serve only as short introductions to the full, regulation-laden text of vacancy announcements. The sections on competency testing and assessment methods remain especially complex. While the content of advertisements meets formal requirements, the presentation still limits accessibility, making it less appealing to a broader pool of potential candidates.

The HRMS supports applicants through multiple communication channels, including social media, monthly “open door” sessions, and a dedicated online platform – the “Candidate corner” – which features a visual roadmap of the civil service hiring process with a narrative explanation, sample tests and preparation materials for each stage, and a FAQ section. It also hosts a YouTube channel and a Viber community to respond to candidate inquiries. Despite these extensive resources and communication efforts, none of the analysed vacancy announcements was made more appealing to candidates by using different visual or textual formats, such as infographics, images, charts, or similar.

<sup>38</sup> On the state body, job position, employment conditions, type and place of work, competencies to be assessed and methods of assessment, the scope of testing, application deadlines, submission procedures, required documentation, and the expected start date of the selection process, as well as the name, phone number, and availability of a designated contact person from the recruiting authority.

The analysis of legislative provisions and sampled vacancy announcements shows that no additional or disproportionate requirements were imposed on candidates during the competition procedure.<sup>39</sup> General employment conditions are limited to Serbian citizenship, legal age, absence of prior termination of employment in a state body due to a serious breach of duty, and no criminal record resulting in imprisonment of at least six months. All positions are equally accessible under the same conditions, and selection is based solely on competency testing. Importantly, passing the state professional exam is neither a prerequisite nor an advantage for entry into the civil service.<sup>40</sup> Moreover, the review of five vacancy announcements from sampled institutions confirmed that the prescribed legal procedure was consistently applied. Overall, recruitment process does not place unreasonable barriers on external candidates, thereby supporting equal access to civil service positions.

Additionally, review of vacancy announcements confirmed that the initial application phase imposes minimal administrative burden on candidates. Applicants are only required to submit the application form, while all other supporting documents are either collected ex officio by the HRMS or requested at later stages of the procedure, once candidates successfully pass all stages before the interview.<sup>41</sup> The Law on General Administrative Procedure,<sup>42</sup> obliges authorities to obtain personal data and facts from official records free of charge, unless the candidate explicitly chooses to provide them independently.<sup>43</sup> This arrangement ensures that candidates are not faced with significant financial or administrative costs at the outset of the recruitment process. Consequently, the recruitment system formally and practically minimises the initial documentation burden, facilitating streamlined application process for candidates. However, it should be noted that incomplete or untimely applications are automatically rejected, without providing candidates a chance to supplement missing documents at the initial submission stage.<sup>44</sup> Although candidates who advance to later stages can submit certain evidence within five working days,<sup>45</sup> the

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39 Such as proof of passing a state exam before application, proof of attendance/certificates of specific courses/technical skills available only to civil servants or costly to take, medical certificates, certified translations, and similar) or those that could only reasonably be expected from an existing civil servants (e.g. very specific information on the tasks and duties of the job position to which they are being recruited).

40 CS who has established an employment relationship for an indefinite period of time and who has not passed the state professional exam shall take the state professional exam within six months from the date of establishment of the employment relationship.

41 Regulation on Internal and Public Competition for Filling Positions in State Bodies, ar. 51.

42 Law on General Administrative Procedure, Official Gazette of the RS, 18/2016, 95 /2018, 2/2023, ar.103, available at: <https://tinyurl.com/46hrbm28>.

43 Such as certificates of citizenship, civil registry extracts, or evidence of having passed the state or bar exam.

44 Civil Servants Law, ar.55.

45 Regulation on Internal and Public Competition for Filling Positions in State Bodies, ar. 26.

strict rejection of incomplete applications at the outset limits flexibility in the recruitment process, by disqualifying potentially qualified candidates.

The lists of candidates who met the selection criteria, along with the points they scored, were published online for all analysed vacancies, except for MAFW. In all those cases, more detailed reasoning behind the decisions – such as the breakdown of candidate performance across different stages of the selection process – was not publicly available but could be obtained via FOI requests and review of selection committees' minutes. While the basic transparency requirement of publishing scores was largely met, the lack of publicly accessible reasoning limits the clarity of the selection process for external stakeholders.

When a public competition is annulled, such as when no candidates meet the selection criteria or when no applications are submitted,<sup>46</sup> the responsible manager issues a decision notifying all eligible candidates of the outcome, and candidates can appeal to the appeal commission within eight days of delivery.<sup>47</sup> However, these decisions are not published or made available online on the HRMS webpage nor on sampled institutions' webpages. The lack of public access to annulment decisions limits transparency and prevents the public from understanding why competitions were annulled.

Key informants expressed mixed views on the meritocracy and transparency of civil service recruitment. Regarding meritocracy of the process, two key informants expressed tendency to disagree that the process is fully merit-based, citing undue influence, persistent corruption, and advantages for former temporary staff, while one key informant expressed agreement, noting improvements through introduction of written competency tests. On transparency, two key informants tended to agree that procedures are somewhat transparent, particularly in candidate support and formal rules, whereas one key informant disagreed, emphasizing limited access to information in internal vacancies and the low effectiveness of appeal mechanisms. Overall, key informants concluded that while regulations provide a sound framework, practical implementation remains imperfect, with merit principle and transparency only partially ensured.

Public perception of civil service recruitment highlights significant concerns about meritocracy and undue influence.<sup>48</sup> Only 25% of Serbian citizens agreed or strongly agreed that public servants are recruited through public competitions based on merit, while 68% disagreed or strongly disagreed, and 7% had no opinion. The majority of citizens sees personal and political connections as decisive factors: 80% agreed or strongly agreed that personal connections (family, friendship, or kinship) are necessary to secure a state administration job,

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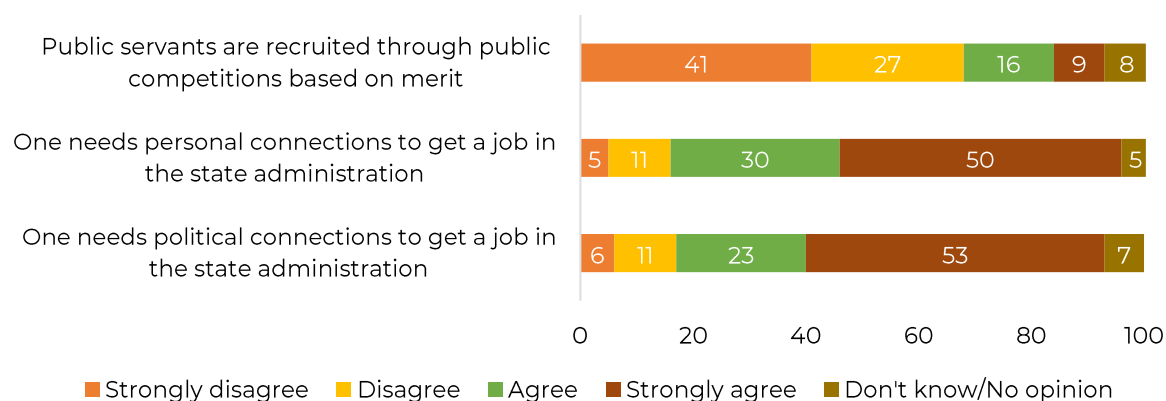
<sup>46</sup> Civil Servants Law, ar.60.

<sup>47</sup> Ibid.

<sup>48</sup> Public perception survey in Serbia was conducted from the 15th of February until the 19th of February 2025. For more information on the sample and list of statements, please refer to the section Methodology Appendix.

and 76% agreed or strongly agreed that political connections (party membership or ties to political organisations) influence recruitment. Overall, these results indicate a strong public opinion that recruitment is driven by personal and political ties rather than qualifications and merit-based assessment procedures.

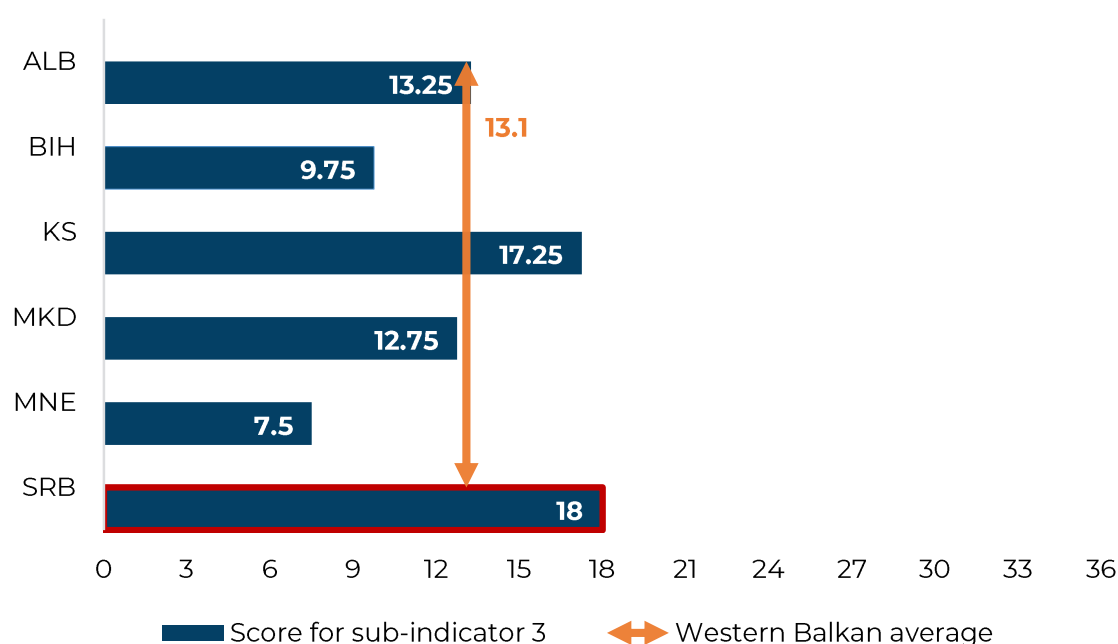
**Chart 1. Share of citizens' responses per agreement scale (%)**



**Note:** All results are rounded to the nearest integer. Due to rounding, percentages may not always appear to add up to 100%. The base for these questions was N = 1006.

## HOW DOES SERBIA DO IN REGIONAL TERMS?

**Sub-indicator 3:** Transparency and merit principle of recruitment process (maximum score 36.5)



## II.4 Merit based selection and protection of top managers from undue political influence

**Principle 10: Effective leadership is fostered through competence, stability, professional autonomy and responsiveness of accountable top managers**

*Awarded points per element in sub-indicator 4: Merit based selection and protection of top managers from undue political influence<sup>49</sup>*

| Indicator elements   | Element type               | Score   |
|--|----------------------------|---------|
| E 4.1 Strategic framework envisages strengthening of professionalism of the civil service top management   | Strategy and policy        | 0.5/0.5 |
| E 4.2 Regulations stipulate competitive, merit-based procedures for the recruitment of civil service top management                                | Legislation                | 1/1.5   |
| E 4.3 Regulations stipulate that acting appointments to top management positions are only made from within the civil service, for a limited period | Legislation                | 1/1     |
| E 4.4 Regulations stipulate objective criteria for the termination of hiring of top management positions   | Legislation                | 1.5/2   |
| E 4.5 Existence of procedures on appointments to top management positions outside of the scope of the civil service legislation                    | Legislation                | 0/3     |
| E 4.6 The merit-based recruitment for top management positions is applied in practice  | Practice in implementation | 3/4     |
| E 4.7 Acting appointments are, in practice, only made from within the civil service  | Practice in implementation | 0/3     |
| E 4.8 Ratio of eligible candidates per top managerial-level vacancy  | Practice in implementation | 0/2.5   |

<sup>49</sup> The fourth sub-indicator focuses on the following SIGMA sub-principles: The law establishes top managers as a specific category. The scope of top management is adequately defined, ensuring that senior managerial positions in ministries and agencies are not treated as political offices; Top management positions are made attractive through fair recruitment, competitive remuneration, professional challenges, autonomy and mitigation of career risks; Recruitment procedures are merit-based, professionally led, impartial and transparent, allowing selection and appointment of top managers with sufficient high-level experience, knowledge, skills, and competencies to perform their job well against predefined standards; Recruitment policies and practices support equal opportunities, gender balance and non-discrimination in top managerial positions; Top managers in public administration have clearly defined objectives, aligned with the mission of the organisation and objectives of the government, and their performance is regularly assessed; Top managers in public administration have sufficient professional and managerial autonomy, enabling them to assume responsibility for the management of staff, resources, and work.

|  |                            |               |
|--|----------------------------|---------------|
| E4.9 Share of non-merit-based appointments to top management positions   | Practice in implementation | 0/2.5         |
| E4.10 Key non-state actors consider that the selection and appointment process of top managers is merit-based and that they are protected from undue political influence | Outcomes and impact        | 0/2.5         |
| <b>Total score for sub-indicator 4</b>   |                            | <b>7/22.5</b> |

*Since the previous monitoring cycle, key issues affecting the merit-based selection of top managers (senior civil servants) and their protection from undue political influence remain mainly unresolved. As SIGMA highlights in its 2024 monitoring report, the excessive use of acting appointments continues to bypass regular competition procedures, creating ongoing risks for the professionalism of top management and the integrity of the entire civil service system.<sup>50</sup> The possibility of removing top managers from office through organisational restructuring is repeatedly highlighted as another major risk. The same report also notes that these positions often lack attractiveness, with few candidates applying for announced vacancies, while selection committees, appointed by the HCSC, frequently lack experts in the relevant fields. Finally, SIGMA takes note of relatively low turnover among top management positions, and high gender parity.*

The PAR strategic framework includes targeted measures to strengthen the professionalism of civil service top management. Under the Measure 3.3 *Strengthening the professionalism of top managers*, the current PAR Strategy Action Plan, valid until the end of 2025, outlines several key activities to this end. These include developing a strategic document on top management; integration of top management policy into relevant legislation; introducing performance indicators for top managers within the appraisal process; establishing a network of top managers to facilitate experience exchange; enhancing professional development of top managers through the Career Management Centre; and the development of competency-based training programmes. The Action plan also clearly assigns implementing and supporting institutions for each activity.

The CSL provides a formal basis for a professional top management by prescribing, in principle, competitive and merit-based recruitment procedures, while limiting acting appointments to existing civil servants. Recruitment, including for top management positions, is further regulated by the bylaw on

<sup>50</sup> SIGMA/OECD, *Public Administration in Serbia 2024: Assessment against the Principles of Public Administration*, 2025, pp. 44. Available at: <https://tinyurl.com/3f9ua2pt>

filling vacancies,<sup>51</sup> which requires announcements of competitions and details the application and selection process, including competency and skills testing. For top management posts, the HRMS announces either an internal or public competition, and the HCSC conducts the competition. Also, the HCSC appoints selection committees composed of civil servants and subject-matter experts. Candidates are assessed through tests of general functional, special functional, and behavioural competencies, followed by interviews. The assessment of general functional and behavioural competencies is conducted by the HRMS, while the assessment of the special functional competencies and the interviews are administered by the selection committee. Selection committees submit a ranked list of up to three best candidates meeting the benchmarks to the head of hiring body or another authorised proposer of candidates for appointment. However, the proposer is not obliged to recommend any candidate to the Government and must only inform the HCSC and HRMS of the reasons for doing so, which undermines the merit principle at the very final stage of the top management recruitment process.

However, despite the provisions in the CSL, the final appointment of officially proposed candidates ultimately depends on procedures outside the civil service framework. Under the Government's Rules of Procedure (RoP), the Government's Personnel Commission reviews and proposes appointments and dismissals within its remit, adding an additional layer of assessment before final nomination.<sup>52</sup> This arrangement raises concerns because: (1) the RoP is not part of the civil service legislative framework; (2) the CSL explicitly assigns the proposal of candidates to the head of the hiring body; and (3) the Government Personnel Commission, as a permanent working body composed of Government members and other senior officials (including state secretaries), constitutes a political instance capable of intercepting, and effectively overruling, the merit-based appointment process for top managers.

Also, the CSL explicitly limits acting appointments to full-time civil servants who meet the prescribed requirements, and for a maximum of six months. It further stipulates that an internal or public competition must be launched within 30 days of the acting appointment. Only if the competition fails to result in an appointment, or is otherwise unsuccessful, may the acting status be extended for an additional three months. In exceptional circumstances, acting appointments may also be made to temporarily replace a top manager absent for more than 30 days, until their return. Overall, the CSL provides for certain safeguards when top management positions are to be temporarily filled without application of merit-based procedure.

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<sup>51</sup> Regulation on the Internal and Public Competition for Filling in Vacancies in State Bodies, Official Gazette RS no. 2/2019 ad 67/2021.

<sup>52</sup> Article 31, Rule of Procedure of the Government, Official Gazette of RS, no. 61/2006 - revised text, 69/2008, 88/2009, 33/2010, 69/2010, 20/2011, 37/2011, 30/2013, 76/2014 and 8/2019 - other regulation).



Regarding the legally established grounds for terminating the tenure of top managers, the CSL defines mostly objective criteria, with some critical exceptions. Certain provisions allow for dismissal on insufficiently precise grounds, such as “serious disruption” in the functioning of a state body attributed to a top manager’s failure to meet work plans or strategic goals. Moreover, top manager positions may be abolished through changes to the rulebooks on internal organisation and systematisation, without clear safeguards to ensure fully objective and impartial criteria for such abolishment (see table below).

**Table 10: Termination of top managers’ employment**

| CRITERIA  | Reasons for termination of work <sup>52</sup>  |
|---|--|
| <i>Recurrent negative performance appraisals<sup>53</sup></i>   | According to results of annual or extraordinary performance appraisal, top manager is evaluated with outcome 1,8-2,5 i.e., “needs improvement” (dismissal)                             |
|   | According to the final decision based on performance appraisal, top manager is evaluated with outcome 1,0-1,7 i.e., “did not meet the majority of expectations” (dismissal)            |
|   | Authority responsible for appointment determines that there has been a serious work disruption due to responsibility for failure to achieve work plans and strategic goals (dismissal) |
| <i>Restructuring and downsizing for objective technical, financial, economic, or organisational reasons</i> | A state authority is abolished, and its scope is taken over by another state authority or not taken over by any state authority (abolishment)  |
|   | A state authority is abolished, and part of the scope of the state authority top management position belongs to is taken over by another state authority (abolishment)                 |
|   | A top management position is abolished by adopting a new or amending the existing Rulebook on internal organisation and systematisation (abolishment)                                  |

<sup>53</sup> All reasons, including termination, abolishment, and dismissal from work. CSL Articles 76-78.

<sup>54</sup> The legal framework allows for dismissal of top managers based on the results of a single performance appraisal cycle. Still, according to the *Regulation on Performance Appraisal of Civil Servants (Official Gazette of RS, no. 2/2019, 69/2019 and 20/2022)*, heads of authorities are required to continuously monitor the work of top managers. If it is determined that the established annual goals are not being met, a written notice of identified deficiencies must be issued, setting a deadline of at least three months for improvement. Should the organisational unit under the top manager’s leadership still fail to achieve the required results within this period, the head of the authority may initiate an extraordinary performance appraisal.



|   |   |
|---|---|
| <i>Objectively verifiable circumstances</i>                   | End of one's term (termination of work)   |
|   | Submission of a written resignation (termination of work)   |
|   | Assumes office as an official in a state, provincial or local self-government body (termination of work)  |
|   | Reaching retirement age (termination of work)   |
|   | Prison sentence or probation sentence of at least six months (dismissal)  |
|   | For other reasons provided for in the general labour regulations, which govern the termination of the employment relationship regardless of the will of the employee and the will of the employer (dismissal) <sup>54</sup> |
| <i>Ethics-related reasons and disciplinary responsibility</i> | An authority responsible for appointment accepts the Ombudsman's public recommendation for dismissal (dismissal)  |
|   | An authority responsible for appointment accepts the Anti-Corruption Agency's initiative for dismissal based on its measure of public disclosure of recommendation for dismissal (dismissal)                                |
|   | A final decision imposing a disciplinary sanction of termination of employment (dismissal)  |

An analysis of the most recent completed competition procedures for top managers in the five state administration bodies covered by this report indicates that the formal steps of merit-based selection and appointment were largely observed although with low level of competition. Notable deviations in practice raise concerns about timeliness and predictability of outcomes. For example, in the Tobacco Administration, the last completed recruitment cycle for a top management position began in 2015, prior to the legal introduction of the competency framework now used in recruitment and concluded only in 2021. This five-year delay between vacancy announcement and appointment not only creates uncertainty for candidates but also undermines the relevance of this selection process, as it was finalised under a significantly amended CSL.<sup>56</sup> Such cases highlight the need for procedural safeguards to ensure that recruitment processes are concluded within reasonable timeframes and under the same legal framework in which they are initiated. Key findings for the observed sample are presented in the table below.

<sup>55</sup> According to the Article 176 of the Labour Law such reasons include the loss of ability to work, prohibition from performing certain tasks while employer cannot provide for performance of other tasks, absence from work for a period of more than six months due to serving a sentence, or issuance of security, correctional or protective measure. Labor Law, Official Gazette RS, no. 24/2005, 61/2005, 54/2009, 32/2013, 75/2014, 13/2017 - decision of the Supreme Court, 113/2017 and 95/2018 - authentic interpretation).

<sup>56</sup> In the response to the freedom of information request sent to the Tobacco Administration, it is stated that the vacancy was announced on 4 November 2015, while the Government Decision on appointment is dated 21 January 2021.

**Table 11: Application of merit-based competition procedure for hiring top managers (sample based)**

| <i>SAMPLE</i> | <i>Type</i>     | <i>Position</i>    | <i>Applied</i> | <i>Eligible</i> | <i>Written testing</i> | <i>Interview</i> | <i>Selection list</i> | <i>Appointed</i> |
|---------------|-----------------|--------------------|----------------|-----------------|------------------------|------------------|-----------------------|------------------|
| <i>TA</i>     | Public (2015)   | Assistant Director | 5              | 2               | x                      | ✓                | 1                     | ✓ (2021)         |
| <i>MoE</i>    | Internal (2024) | Assistant Minister | 1              | 1               | ✓                      | ✓                | 1                     | x                |
| <i>DMPM</i>   | Public (2023)   | Director           | 2              | 1               | ✓                      | ✓                | 1                     | ✓ (2023)         |
| <i>MIT</i>    | Internal (2023) | Assistant Minister | 1              | 1               | ✓                      | ✓                | 1                     | ✓ (2024)         |
| <i>MAFW</i>   | Internal (2025) | Assistant Minister | 1              | 1               | ✓                      | ✓                | 1                     | ✓ (2025)         |

Further assessment of practice confirms that, despite the safeguards introduced by the CSL, acting appointments to top management positions are not necessarily made from the existing civil service pool. The HRMS does not maintain state-wide records on the previous employment status of acting appointees, and the Government's publicly available appointment acts also lack this information. The scale of the issue is substantial: in the 12-month period prior to monitoring (1 April 2024 – 1 May 2025), out of 130 appointment decisions, 105 (81%) were acting appointments and only 25 (19%) were regular appointments.<sup>57</sup> As noted in previous PAR Monitor editions, the problem is aggravated by repeated reappointments of the same individuals to acting positions well beyond the legal time limits, in some cases for several years. This entrenched reliance on acting appointments, and in clear breach of the CSL, remains the single greatest obstacle to building a professional and politically independent top management.

Practical difficulties in securing a professional top management are also evident from the ratio of eligible candidates per vacancy. In the same 12-month period prior to monitoring, 32 competition procedures for top management positions were completed, with 57 candidates meeting the eligibility requirements, averaging fewer than two eligible candidates per vacancy.<sup>58</sup> Such a low level of competition limits the effectiveness of merit-based recruitment and increases the risk of appointments being influenced by factors other than professional competence. Key informants broadly reject the view that top managers are selected and appointed based on merit or are adequately protected from undue political

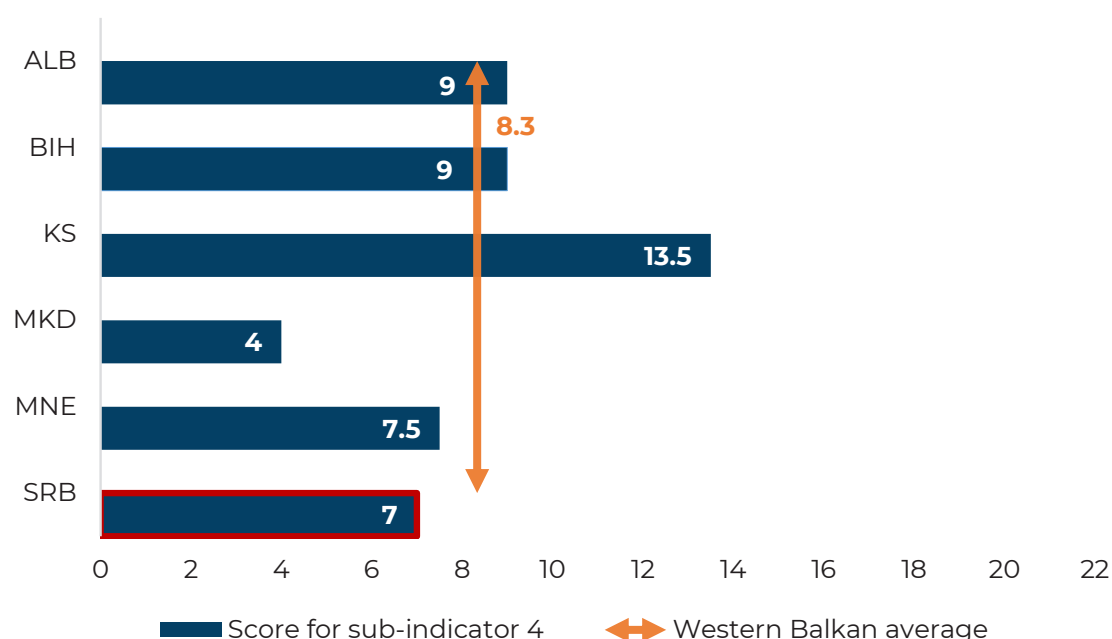
<sup>57</sup> Data received via response to the freedom of information request.

<sup>58</sup> Data received via response to the freedom of information request.

influence, pointing instead to pervasive political interference.<sup>59</sup> The composition of selection committees is seen as an impediment, as it is often lacking independent professionals. Suggested remedies include removing public officials from committees' membership and introducing automatic extensions of top managers' tenure if no new competition is launched. Consistent with evidence from practice, key informants stress that acting appointments are frequently misused, with positions filled by non-civil servants, prompting calls for stricter rules or even abolishing acting roles altogether. They also highlight the volatility of top management posts, noting that even regular appointees can be removed through organisational changes, while their career trajectories are often shaped by loyalty, as senior staff tend to depart together with ministerial changes. Altogether, key informants view the current system of top managers as highly politicised, unstable, and in need of stricter safeguards to ensure merit-based, professional leadership.

## HOW DOES SERBIA DO IN REGIONAL TERMS?

**Sub-indicator 4:** Merit based selection and protection of top managers from undue political influence (maximum score 22.5)



<sup>59</sup> Key informant interviews were held on May 30<sup>th</sup>, June 13<sup>th</sup> and July 2<sup>nd</sup>, 2025. Two key informants responded with fully disagree and one responded with tend to disagree to the statement “*Top managers (senior civil servants) are selected and appointed based on merit*” while all three key informants responded with fully disagree to the statement “*Top managers (senior civil servants) are sufficiently protected from undue political influences.*”

## II.5 Transparency and clarity of information on the civil service remuneration

**Principle 10: Public servants are motivated, fairly and competitively paid and have good working conditions**

*Awarded points per elements in sub-indicator 5: Transparency and clarity of information on the civil service remuneration<sup>60</sup>*

| Indicator elements  | Element type               | Score        |
|---|----------------------------|--------------|
| E 5.1 Regulations define a simply structured remuneration system  | Legislation                | 1.5/1.5      |
| E 5.2 Information on civil service remuneration system is available online                                  | Practice in implementation | 1/2          |
| E 5.3 Citizen friendly explanations or presentations of the remuneration information exist                  | Practice in implementation | 2/2          |
| E 5.4 Key informants consider information on the civil service remuneration system as transparent and clear | Outcomes and impact        | 0/3.5        |
| <b>Total score for sub-indicator 5</b>  |                            | <b>4.5/9</b> |

Since the previous monitoring cycle, there have been no major amendments to the Law on the Salaries of Civil Servants and General Employees, nor other changes that would affect the current system. The salary system remains partially fragmented, as several institutions and categories of civil servants operate under separate systems for calculating salary bases – including the Ministry of Interior, Ministry of Defence, Tax Administration, Customs Administration, Administration for the Execution of Criminal Sanctions, and civil servants working in courts and prosecutors' office.<sup>61</sup> Furthermore, the Law on the Salary System of Public Sector Employees, enacted to reform the salary system across the public sector, was repealed in March 2025. Previously, the application of the Law had been postponed several times, most recently to

<sup>60</sup> The fifth sub-indicator focuses on the following SIGMA sub-principles: The public administration offers a competitive package of financial and non-financial compensation: remuneration and benefits, development and career opportunities, job security, and a respectful and inclusive work environment, to attract, motivate and retain employees and teams with the required skills and competencies; The salary system is transparent to employees and the public, while ensuring a sufficient degree of protection of sensitive personal data.

<sup>61</sup> SIGMA/OECD, *Public Administration in Serbia 2024: Assessment against the Principles of Public Administration*, 2025, pp. 60-61. Available at: <https://tinyurl.com/3f9ua2pt>

January 1<sup>st</sup>, 2025. However, the attempts to unify the salary system through this Law ultimately produced no results as it has been repealed, and it is unclear whether similar initiatives will be brought forward in the future.

The salary system is governed by the Law on Salaries of Civil Servants and General Employees, which regulates all core elements of remuneration. Primarily, the Law provides a table with coefficients per civil service rank, pay group and pay grade.<sup>62</sup> It also prescribes the amounts of salary supplements, conditions for their use and options for their combination.

**Table 12: Basis and amounts of salary supplements<sup>63</sup>**

| <i>Basis for the salary supplement</i>             | <i>Amount/limits of the supplement</i>  |
|--|---|
| night work   | each hour amounts to 26% of the value of one working hour of the base salary                                |
| work on a public holiday that is not a working day | each hour amounts to 110% of the value of one working hour of the base salary                               |
| additional workload <sup>62</sup>                  | 4% to 8% of the base salary, or 5% to 10% if the civil servant is substituting the head of an internal unit |
| on-call duty                                       | each hour amounts to 10% of the value of one working hour of the base salary                                |

In addition, a salary can be supplemented in cases of overtime work.<sup>64</sup> However, overtime is primarily compensated by awarding additional time off to a civil servant – one and a half hours for each hour spent working overtime. Only in cases where a civil servant, due to the nature of the job, cannot take compensatory time off in the month following the month of overtime work, each overtime hour is paid at a rate 26% higher than the base hourly pay.<sup>65</sup> Rules on combining supplements specify that supplements for night work, work on a public holiday that is not a working day, and for additional workload exclude the overtime work supplement. If a civil servant is called in to work while on-call, the time spent working is considered overtime.<sup>66</sup> Finally, the Law

62 Article 13, Law on Salaries of Civil Servants and General Employees, Official Gazette No. 19/2025, available at: <https://tinyurl.com/24e85cxv>

63 The supplement for additional workload can be added to a salary if a civil servant (based on a written order of a supervisor) performs tasks not included in their job description due to a temporary workload increase or due to an absence of the civil servant who otherwise performs those tasks. Article 26, Law on Salaries of Civil Servants and General Employees.

64 Senior civil servants are entitled only to supplements for time spent in employment. Ibid, Article 29.

65 Ibid, Articles 24-28.

66 Ibid, Article 30.

does not envisage performance-related discretionary supplements (bonuses), limiting the possibility for arbitrary awards. It should be noted that both the CSL and the Law on Salaries of Civil Servants and General Employees envisage rewarding civil servants based on two consecutive positive performance appraisals.<sup>67</sup> However, this does not represent discretionary supplements, as this type of reward implies an increase in the salary coefficient, and, thus, a permanent salary increase. Taken together, these provisions establish a clear, detailed remuneration framework.

A citizen-friendly presentation of the remuneration system is available at the HRMS website, in the “Candidates’ corner” (*Kutak za kandidate*). This section contains a tool called *salary calculator*, which provides salary estimates based on the selected state administration body, rank, and pay grade.<sup>68</sup> While the tool does not provide a comprehensive overview of the entire system, it allows candidates to estimate their earnings and enables other interested parties to gain an understanding of the potential salary range for different civil servants’ ranks. Moreover, this section contains a table outlining the required years of experience and education for each rank, helping candidates assess their eligibility and estimate potential salaries more precisely. Such tools significantly enhance the transparency and citizen-friendliness, especially given that most relevant information is otherwise contained only in legal documents, which do not specify salary ranges and are not easily understood by those without prior knowledge of the system.

Apart from the efforts to provide citizen-friendly tools, an increase in the availability of information on salaries was also noted in this monitoring period. Namely, the Ministry of Finance has published a report on the salaries per sector and typical job positions for June 2025, which draws on data from the centralised payroll information system (*ISKRA*). This report contains data on average, median, minimum and maximum salaries per civil service ranks and typical job positions and the number of employees per education level, including salary ranks for each level of education.<sup>69</sup> However, the report does not include gender pay gap data or other gender-sensitive information. On the other hand, it provides valuable statistics that help interested parties better understand the system, particularly when used alongside the salary calculator. As this is the only such report available at the Ministry of Finance’s website, long-term transparency will depend on regular reporting practices, broader data coverage, and the integration of gender-sensitive and other relevant analytical dimensions.

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<sup>67</sup> Article 16, Law on Salaries of Civil Servants and General Employees, and Article 87a, Civil Servants Law.

<sup>68</sup> Available at: <https://tinyurl.com/c8raptx9>

<sup>69</sup> Available at: <https://tinyurl.com/ajhyky5>

Nevertheless, salary information is still not available in vacancy announcements, which do not even contain an approximate salary range for the advertised position. Moreover, the CSL and the Regulation on Internal and Public Competitions for Filling Vacancies in State Authorities do not require the institutions to provide such information, making it highly unlikely that this practice will be improved in the future without a legal obligation.<sup>70</sup>

Finally, key informants in general do not consider that the remuneration system is clear or transparent.<sup>71</sup> While they noted that relevant information is available in the legislation, they stressed that the system itself is not sufficiently clear. One key informant emphasised that the availability of information in legal acts is not enough, and that other relevant information must also be easy to understand and find, in order to meet standards of clarity and transparency. The same informant also noted that transparency issues additionally stem from the fact that several legal acts (apart from the analysed Law) define salary bases. On a positive note, key informants highlighted the salary calculator as an example of good practice in terms of communication towards the public and interested parties, noting that the public is less interested in the remuneration framework and more in the specific salary for a given position. These findings point to the necessity of more citizen-friendly presentations of the salary system, with regular publication of statistics, containing salary ranges per civil service rank as a minimum, and availability of information on salary range in vacancy announcements.

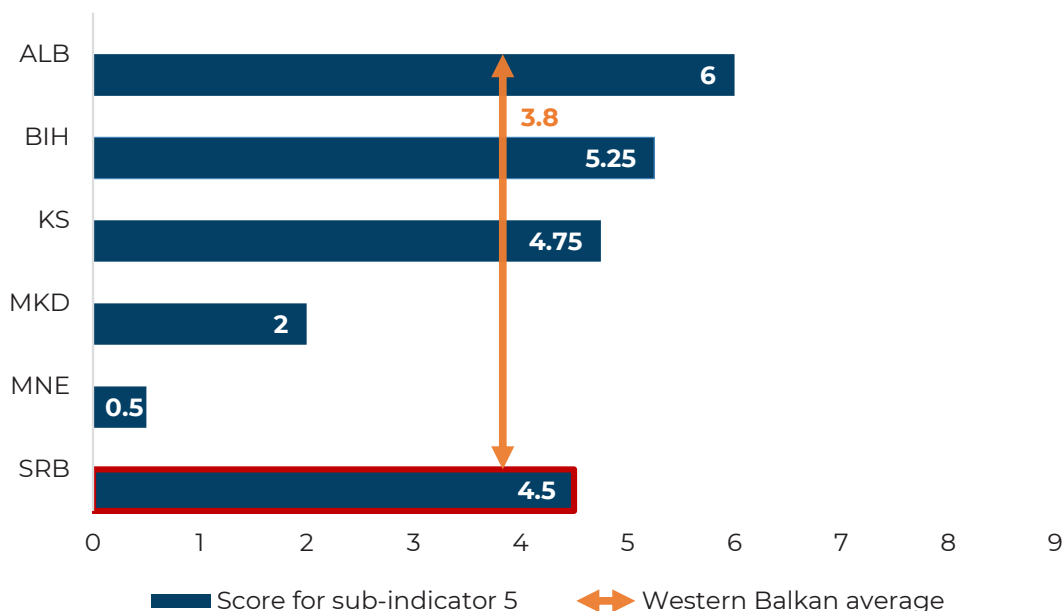
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<sup>70</sup> Article 55, Civil Servants Law and Article 11, Regulation on internal and public competitions for filling vacancies in state authorities, Official Gazette No. 67/2021, available at: <https://tinyurl.com/45br78uh>

<sup>71</sup> Key informant interviews were held on May 30<sup>th</sup>, June 13<sup>th</sup> and July 2<sup>nd</sup>, 2025. Two key informants stated that they tend to agree, while one stated that they fully disagree with the statement “*Civil service remuneration (salary) system is transparent.*” Regarding the statement “*Civil service remuneration system (salary) is sufficiently clear.*”, one key informant stated that they tend to agree, one that they tend to disagree, and one that they fully agree.

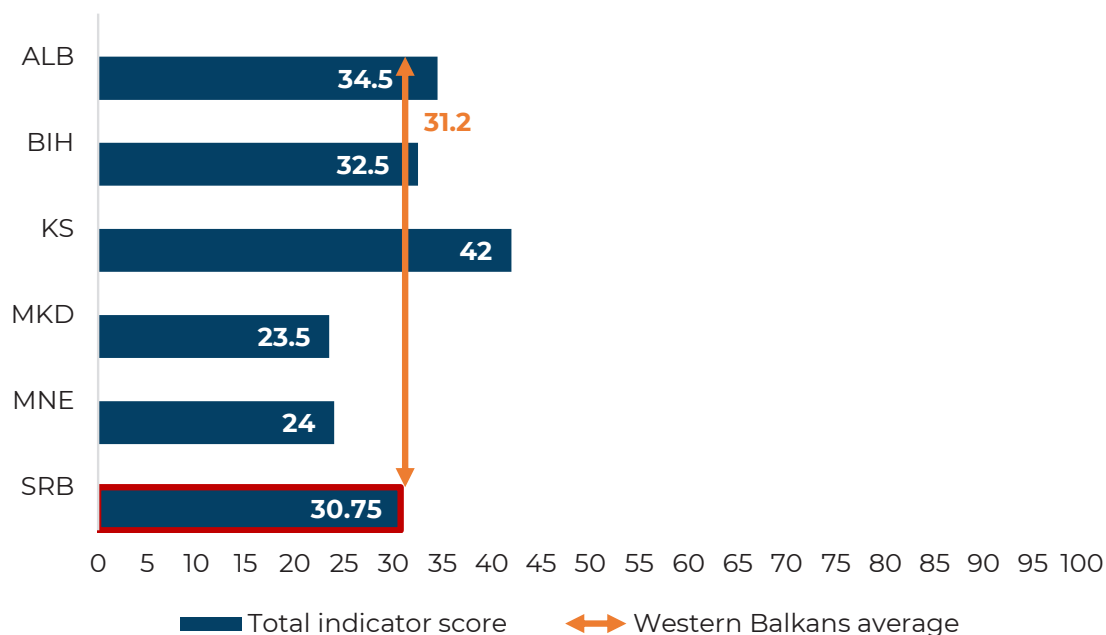
## HOW DOES SERBIA DO IN REGIONAL TERMS?

**Sub-indicator 5:** Transparency and clarity of information on the civil service remuneration (maximum score 9)



## OVERALL SCORES COMPARISON IN THE PUBLIC SERVICE AND HUMAN RESOURCE MANAGEMENT AREA

**Indicator:** Transparency, openness and meritocracy of civil service and human resource management



Regional overview report for Public Service and Human Resource Management area, with results for all WB administrations is available at: [www.par-monitor.org](http://www.par-monitor.org)



## II.6 Recommendations for the Public Service and Human Resource Management

### II.6.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

| <i>Recommendations</i>   | <i>Type (short term/medium term/long term)<sup>72</sup></i> | <i>Status</i> | <i>Explanation</i>  |
|--|---|---------------|---|
| The Government should ensure full interoperability of the HRM information system (the Central Personnel Registry - CPR) with other relevant systems, such as the payroll system. | Medium term   | N/A           | The HRM information system, including the Central Personnel Registry as one of its components, is still not fully operational. No information is available on when it will become functional or whether it will be interoperable with other relevant systems. However, it should be noted that the Regulation on the Central Personnel Registry does envisage data exchange: "Synchronisation and exchange of data from the Central Personnel Registry with other technical systems for electronic data exchange will be carried out through the service bus of the state administration authority responsible for developing and implementing standards and measures for introducing information and communication technologies in state administration bodies and government services, or, where necessary, through individual web services. The established data records, through services available via the e-Government Portal and the state service bus, will be used for the Central Personnel Registry to collect up-to-date data and to provide its records for the needs of other systems." <sup>73</sup> |

<sup>72</sup> Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations require more than three years to be implemented.

<sup>73</sup> Article 5, Regulation on the Central Personnel Registry, Official Gazette No. 3/2024. Available at: <https://tinyurl.com/2bzfw2nm>

|   |             |                       |  |
|---|-------------|-----------------------|--|
| In addition to enabled interoperability, the new central personnel registry should allow for generating quick reports on the relevant HRM issues, such as the annual turnover for the different staff categories/ administrative bodies or division of data on civil servants by categories and administrative bodies.  | Medium term | N/A                   | Due to the fact that the information system is still not fully operational, as mentioned above, it cannot be assessed whether it can allow generating reports on relevant issues in the HRM area.  |
| The Government should enact a special regulation on the CPR. The regulation should explicitly prescribe the contents of the Registry, frequency, and methods of updating it, its management and monitoring, as well as methods to verify accuracy of data and measures for bodies that do not comply with the CSL and the regulation (who do not provide the data in the registry). | Short term  | Partially implemented | The Regulation on the Central Personnel Registry was adopted in January 2024. It prescribes the contents of the Registry, frequency, and methods of updating it and its management. However, the Decree does not specify the monitoring, methods to verify accuracy of data and measures for bodies that do not comply with the CSL and the regulation, i.e., do not provide the data in the registry. <sup>74</sup> |
| The MPALSG and the HRMS should regularly publish statistical data on the civil service and make it available in open data format. The data on the number of civil servants should at least be broken down by basic ranks/functions and by institutions. Such datasets should also be published at the central Open Data Portal, available for download and reuse free of charge.    | Short term  | No action taken       | The MPALSG and the HRMS do not publish statistical data on the civil service on their websites or the Open Data Portal.  |

<sup>74</sup> Ibid

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|--|--------------------|------------------------------|---|
| <p>The HRMS, NAPA and the Ministry of Finance should produce and publish comprehensive annual reports on the civil service from areas within their competence that are currently either not being produced or not being published. Those include planning and recruitment, performance appraisal, career development, and remuneration policy. In addition to quantitative elements, the reports should contain outcome-oriented components that would address the quality of work of the civil service and assessments of its professionalisation and depoliticisation.</p> | <p>Medium term</p> | <p>Partially implemented</p> | <p>The NAPA regularly prepares and publishes annual reports on professional development, specifically on trainings offered to civil servants.<sup>75</sup> The Ministry of Finance issued a report on salaries in June 2025, though it remains unclear whether this practice will continue on a regular basis.<sup>76</sup> However, these reports contain mainly quantitative elements and lack a deeper qualitative analysis. Regarding the HRMS, key informants noted that it produces several annual reports, such as those on staff outflow and performance appraisals, but these are not made publicly available.</p> |
| <p>The Government, HRMS and MPALSG should intensify activity on promoting reports and data on civil service through the most popular nation-wide means, including webpages, social media, press releases and media statements. Such promotion can contribute to an improved public image of the state administration, increased transparency, and trust, as well as increased attraction of potential high-quality candidates for work in the state administration.</p>  | <p>Short term</p>  | <p>No action taken</p>       | <p>None of the available reports mentioned in the analysis – reports on trainings, salaries and compliance with the Code of conduct – are actively promoted or widely advertised.</p>   |

<sup>75</sup> Available at: <https://tinyurl.com/3cuwm694>

<sup>76</sup> Available at: <https://tinyurl.com/ajhyky5>

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| <p>The Government should make the duration limits for temporary engagements more explicit and clearer and prescribe unambiguous criteria for the selection of temporary staff in the state administration. The duration of all forms of temporary engagement contracts (a fixed-term contract under the CSL, temporary and service contracts under the Labour Law) should be legally limited to up to one year and there should be clear and transparent criteria for possible renewal of such contacts after the expiry of the one-year period. Criteria for temporary employment should contain requirements and/or competences which are equal or similar to those required for civil servants performing tasks (jobs) of similar complexity.</p> | <p>Short term</p> | <p>Partially implemented</p> | <p>Fixed-term contracts regulated under Law on the Civil Servants require either a public competition to be conducted for the purpose of hiring (implying mandatory competency check), passed competency check for at least one competency required to work in the position, or require that a person being hired has passed a public competition in the previous four years, meeting all selection criteria, without the necessity to conduct the public competition again. However, these provisions will come into force as of January 2026 and public administration bodies are not oblige to conduct competitions for fixed-term employment until then.<sup>77</sup> All fixed term contracts under this Law are limited based on the reason of employment: 1) replacing an absent civil servant - until his return; 2) temporarily increased workload - maximum of six months; 3) workplaces in the cabinet - while the official's duty lasts; 4) training interns - while the traineeship lasts; 5) replacing a civil servant who has been appointed as an acting official - while his duty lasts; 6) replacing a civil servant whose employment relationship is suspended due to an internship – until his return.<sup>78</sup> However, there are no limitations in terms of renewal of fixed-term contracts with same individuals. Moreover, temporary and service contract regulated under the Labour Law do not specify the requirements in terms of competencies. Service contracts do not have a limited duration, while temporary employment contracts are limited to 120 days, but there are no limitations in terms of renewal of this contract with the same individual.<sup>79</sup></p> |
|--|-------------------|------------------------------|---|

<sup>77</sup> Article 63, Law on the Civil Servants, Official Gazette No. 19/2025, available at: <https://tinyurl.com/2wa4vwds>

<sup>78</sup> Ibid.

<sup>79</sup> Articles 197 and 199, Labour Law, Official Gazette No. 95/2018, available at: <https://tinyurl.com/hramjdm5>

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|---|-------------------|------------------------------|--|
| <p>State administration bodies should be obliged to conduct public competitions for all types and grounds of temporary engagement in the civil service. Competencies of candidates should be examined based on clearly set criteria for temporary engagement.</p> | <p>Short term</p> | <p>Partially implemented</p> | <p>There are six bases for fixed-term engagement under the Law on Civil Servants: 1) replacing an absent civil servant; 2) temporarily increased workload; 3) workplaces in the cabinet; 4) training interns; 5) replacing a civil servant who has been appointed as an acting official; 6) replacing a civil servant whose employment relationship is suspended due to an internship. An employment relationship in cases 2) and 4) is established following public competition. Employment relationship in cases 1), 3), 5), and 6) is established without the obligation to conduct an internal or public competition, after the verification of at least one competency required for work in the given position, through a procedure determined by the head of the authority, applying the methods of competency verification used in the selection process. By way of exception, a state authority may employ, for a fixed term due to a temporarily increased workload and without conducting a public competition, a person who, within the previous four years, has participated in a public competition conducted by a state authority and met the criteria prescribed for selection in that competition procedure, provided that the person meets the requirements for the position and possesses the necessary competencies. However, it should be noted that these sections of the Law will come into force from January 2026.<sup>80</sup> Finally, public competitions are not mandatory for hiring personnel on the basis of temporary and service contracts.</p> |
|---|-------------------|------------------------------|--|

<sup>80</sup> Article 63, Civil Servants Law.

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| State administration bodies advertising vacancies should translate the bureaucratic language of public competitions into a simpler and clearer language, include visual elements such as infographics or videos explaining the steps in the recruitment process, as well as publish a FAQ sheet clarifying the most challenging questions based on the previous practice. All subsequent questions for clarification should be made public with a corresponding answer. | Short term | Partially implemented | The results of this monitoring cycle indicate that public competition announcements are still written in a bureaucratic style with no visual elements. However, it is important to note that the HRMS has made efforts to summarise public competitions and highlight the most relevant information using more accessible language. These summaries help simplify the announcements, although they serve only as an introduction to the full competition text, which is provided in the annex. Moreover, the HRMS attempts to clarify these aspects for candidates through various communication channels, including social media, a YouTube channel, and regular responses to questions through its Viber community, and monthly “open door” sessions. They also maintain a dedicated platform for candidates, <sup>81</sup> which includes a visual map of the selection process, frequently asked questions and other useful guidance. |
| The institutions advertising vacancies should introduce search engines on their respective webpages for filtering vacancy announcements according to multiple criteria.   | Short term | Partially implemented | HRMS website offers a search engine which enables filtering all vacancies according to several criteria: name of the institution, place, date of the competition, and whether the competition is active, internal or public. <sup>82</sup> However, websites of five sample administration bodies analysed in this monitoring cycle (Tobacco Administration, Ministry of Education, Directorate for Measures and Precious Metals, Ministry of Informing and Telecommunications and Ministry of Agriculture, Forestry and Water Management) do not provide search engines for filtering vacancy announcements.   |

81 See at: <https://kutak.suk.gov.rs/>

82 Available at: <https://www.suk.gov.rs/konkursi/170>

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|--|------------|-----------------------|---|
| State administration bodies should intensify advertising vacancies through social media channels and invest efforts in making the advertised content visually attractive and reader friendly.  | Short term | Partially implemented | The analysis of vacancy announcements for five sample public administration bodies (Tobacco Administration, Ministry of Education, Directorate for Measures and Precious Metals, Ministry of Informing and Telecommunications and Ministry of Agriculture, Forestry and Water Management) showed that there were no efforts to make the announcements visually attractive and reader-friendly, while also indicating that social media of said institutions are not used as a means of communicating vacancies to the interested parties. However, the HRMS regularly notifies the members of its Viber community on the vacancies, while also utilising the reader-friendly presentations mentioned above. |
| Institutions advertising public competitions should use the eGovernment Portal, in line with article 54 of the CSL. With the increased visibility of the portal in the recent year, this can improve the promotion of vacancies and contribute to higher ratio of eligible candidates. | Short term | Fully implemented     | All five sample bodies utilised the eGovernment Portal for advertising analysed vacancy announcements. It should be noted that this section of the eGovernment Portal does not list the vacancies but provides a link to the websites of the HRMS and the National Employment Service, where all job listings can be found. <sup>83</sup>   |

83 Available at: <https://tinyurl.com/4yp5sanp>

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| <p>A passed professional state exam should not be a prerequisite but a long-term requirement for employment in the senior civil service. Alternatively, and as a minimum, taking the exam should be made free of charge, the timeframe for taking the exam should be prolonged and candidates should be offered free access to courses and tutorials to help them prepare for the exam. This would create equal conditions for external candidates and candidates applying from within the administration.</p> | <p>Short term</p> | <p>Not implemented</p>       | <p>Article 45 of the CSL prescribes all conditions for employment in the senior civil service (such as general employment conditions, years of experience, education level, etc.), not mentioning the professional state exam among the list of prerequisites.<sup>84</sup> However, the same Article further specifies that candidates who did not already pass the exam can be employed as civil servants, but need to pass it within the prescribed deadline, while this option is not mentioned for senior civil servants. Moreover, the analysis indicated that the passed professional state exam is listed as a condition of employment for senior civil servants in both public and internal competitions for such posts, indicating that, although the CSL is not precise in this regard, the exam remains a prerequisite.</p> |
| <p>The decisions and reasoning of the ranking and selection of all participating candidates in all recruitment phases, as well as on the annulment of public competitions, should be made publicly available, with due respect for the protection of personal information, thus allowing for increased external scrutiny and creating added pressure for merit-based selection.</p>  | <p>Short term</p> | <p>Partially implemented</p> | <p>The decisions of the ranking and selection of all participating candidates in all recruitment phases were available in this monitoring cycle for four out of five sample bodies, exception being the Ministry of Agriculture, Forestry and Water Management. However, more detailed explanations on the reasoning behind the ranking and selection are still not published and have to be obtained through FOI requests. Moreover, information on the annulment of public competitions is still not made publicly available, it is only delivered to candidates who participated in the procedure.</p>   |
| <p>The Government should urgently cease the practice of appointing and reappointing acting managers and start making appointments of senior civil servants in accordance with the legal provisions.</p>  | <p>Short term</p> | <p>No action taken</p>       | <p>From May 2024 to May 2025, a total of 130 appointments to top managers positions were made. Out of those, 105 were acting appointments for which it is unclear whether they were made from the pool of current civil servants or not, indicating that 81% of appointments was not merit-based.<sup>85</sup></p>  |

<sup>84</sup> Article 45, Civil Servants Law.

<sup>85</sup> Data obtained through an FOI sent to the HRMS on May 5<sup>th</sup>, 2025. Response was received on May 9<sup>th</sup>, 2025.



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| It is necessary to announce vacancies for all the positions currently in acting status. Moreover, the Government needs to complete all current competition procedures conducted by the High Civil Service Council by selecting a candidate for appointment.                       | Medium term | No action taken | No vacancy announcements of the positions currently held by acting senior civil servants are available on the HRMS website.  |
| Appointments of senior civil servants should be exempt from the competence of the Government Personnel Commission. Appointment proposals by heads of administrative bodies for filling in the SCS vacancy should be directly forwarded for approval at the Government's sessions. | Short term  | No action taken | According to the RoP of the Government, the Government Personnel Commission is still in charge of the pre-selection of senior civil servants and their final nomination to the government, which is not in line with the competency-based selection prescribed by the CSL. <sup>86</sup>   |
| Information on the offered salary for jobs in the civil service should be part of public competition announcements that are advertised through nation-wide channels.  | Short term  | No action taken | Salary information is still not available in vacancy announcements, which do not even contain an approximate salary rank for the advertised position. Moreover, the Regulation on internal and public competitions for filling vacancies in state authorities does not require the institutions to provide such information. <sup>87</sup> |

<sup>86</sup> Article 31, Rules of Procedure of the Government, Official Gazette No. 8/2019, available at: <https://tinyurl.com/56e5f4nb>

<sup>87</sup> Article 11, Regulation on internal and public competitions for filling vacancies in state authorities, Official Gazette No. 67/2021, available at: <https://tinyurl.com/45br78uh>

|   |            |                       |   |
|---|------------|-----------------------|---|
| The webpages of the MPALSG and HRMS should contain information on average total salaries per different categories of civil servants. Both websites should provide citizen-friendly explanations or visual presentations of salary information.  | Short term | Partially implemented | The MPALSG website does not provide any information on salaries. The HRMS website offers a useful tool called salary calculator, that provides potential salary estimates based on the selected public administration body, rank, and pay grade. <sup>88</sup> This section also contains a table outlining required years of experience and education for each rank, helping candidates assess their eligibility and estimate potential salaries more precisely. Moreover, the report on salaries issued by the Ministry of Finance contains information on average salaries per different categories of civil servants. |
| The HRMS should publicly disclose any reports on the state of play and proposed measures regarding the outflow of staff, which are drafted in line with the article 7 of the Instruction on the methodology for monitoring and analysing the situation related to the outflow of staff and its impact on the work of the state administration.      | Short term | No action taken       | The reports are not available on the HRMS website.  |
| Central state administration bodies should continuously promote the whistleblower protection system to their employees. This can be done through in-house awareness raising workshops across the administration, reader-friendly brochures and counselling about the possibilities given to whistleblowers, including real-life cases and examples. | Short term | Partially implemented | The National Academy for Public Administration offers trainings on whistleblower protection to all civil servants in their annual General training programme for civil servants. Moreover, in March 2024, a special training programme with a specific topic of ethics and integrity was produced by NAPA, offering advanced training on whistleblower protection. <sup>89</sup> On the other hand, data on additional workshops in other public administration bodies is not available, and reader-friendly brochures on this topic are not publicly available.  |

88 Available at: <https://tinyurl.com/c8raptx9>

89 Available at: <https://tinyurl.com/mryypfcc> and <https://tinyurl.com/yc2c3tx3>

## II.6.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT

Recommendations from the monitoring cycle 2024/2025 for the Public Service and Human Resource Management area are listed below. The recommendations are grouped into three types, according to the estimated time needed for their implementation. Recommendations for which the assessed time for implementation is up to one year are labelled as short-term. Medium-term recommendations should be implementable within a period of one to three years. Long-term recommendations would likely require more than three years to be implemented.

### ***Short-term recommendations***

- The application of the legal obligation to publish competitions for filling vacancies for fixed-term civil servant posts has been continuously postponed in the previous years, most recently to January 2026. Starting from January 2026, all hiring authorities should conduct competitions for filling vacancies on a fixed-term basis, in line with Article 63 of the Civil Servants Law. The announcements should be made available on the HRMS website.
- Hiring authorities and HRMS do not publish decisions on the annulment of competitions, which would provide the reasoning for the annulment. This practice precludes the interested public from gaining insights into this aspect of the recruitment procedure and, thus, poses an additional transparency issue. MPALSG and HRMS should ensure that decisions regarding annulled competition procedures are published, along with clear reasoning, to strengthen transparency and public trust in the recruitment process.
- Candidates in the competition process are not allowed to supplement or correct their documentation after submission. The MPALSG, in cooperation with the HRMS, should initiate the revision of the legal framework so as to allow applicants to correct or supplement incomplete applications within a prescribed deadline, preventing unnecessary disqualification of qualified candidates due to minor technical omissions. The Government should adopt the proposal of the amended framework and submit it for formal enactment in the Parliament.
- The current RoP of the Government allows the Government Personnel Commission to pre-select and nominate top manager candidates to the Government, after competitions for these positions are finalised. The General Secretariat of the Government, in cooperation with the MPALSG, should amend the RoP of the Government in order to uphold the competency-based selection procedure introduced by the CSL. This implies removing the jurisdiction of the Government Personnel

Commission for proposing candidates for the senior civil service after the finalisation of competition procedures.

- The legislative provisions restricting the period of time a top manager can spend in the acting status are not observed in practice. The Government should cease the practice of excessive acting appointments and their repeated prolonging to periods longer than those prescribed by the CSL, and initiate the development of an operational plan with the HRMS for filling in the top management vacancies through competitions.
- In the senior civil service domain, critical issues that affect professionalism are: excessive use of acting appointments to senior civil service positions, constant prolonging of acting terms past the legally allowed time period and breaching the provision requiring that appointments to acting positions are made from within the civil service. Thus, control mechanisms are necessary to ensure legal compliance in this area. In that regard, the Administrative Inspection should introduce regular inspection of the legality of decisions on acting appointments in its work programme. This would require not only noting which appointments are not made in accordance with the CSL, but also submission of requests for the annulment of the decisions which breach the prescribed time period or appoint persons outside of the civil service to acting positions.
- Salary information is lacking from vacancy announcements in state administration bodies, which do not even contain an approximate salary range for the advertised position. The MPALSG and the HRMS should initiate the amendments to Article 55 of the CSL, to require the inclusion of expected salary information in all vacancy announcements both public and internal. The Government should adopt the proposal of the amended framework and submit it for formal enactment in the Parliament.
- Until the salary information becomes a mandatory part of vacancy announcements, all hiring authorities should provide a link to the “salary calculator” along with all advertised positions, to enable candidates to gain an insight into their potential salary.

### **Medium-term recommendations**

- The HRMS does not systematically gather, analyse and publish information on the competitions conducted for the appointment of top managers and acting appointments, ultimately undermining transparency, accountability and merit-based recruitment in top managerial positions. The HRMS should establish a practice of systematic and regular gathering and publishing of information related to internal and public competition procedures, including, at minimum:

- number of total and eligible candidates per vacancy,
- number of competitive appointments to the top management positions,
- number of acting appointments, including information on such appointments made outside of the civil service,
- number of dismissals, segregated by reasons for dismissal.
- Due to the absence of published general data and reports on the civil service system, it is currently impossible to gain even a basic understanding of its structure, composition, and dynamics. To address this major transparency and accountability gap, the MPALSG should:
  - establish the practice of regularly producing and publishing comprehensive annual reports on the key aspects of the civil service system. These reports should combine quantitative data and qualitative analysis and cover, among other topics, staff planning, recruitment, turnover, professional and career development, performance appraisal, remuneration, disciplinary responsibility, and ethics and integrity;
  - ensure regular publication of, at least, basic statistical data on the civil service, in open and reusable formats. This should include, at a minimum: the total number of civil servants; distribution by public administration bodies (or types of bodies); by civil service ranks; by managerial and non-managerial positions; and by gender. Such data should be published on the MPALSG and HMRS website and the Open Data Portal, available for free download and reuse.

### ***Long-term recommendations***

- The coexistence of multiple categories of staff governed by different recruitment rules has created inconsistencies in the application of merit-based recruitment and transparency standards across the civil service. Such a lack of a merit-based approach to recruitment and selection ultimately undermines the integrity and professionalism of the public administration. The MPALSG should, as the main policymaker in this area, initiate the revision of the policy and legal framework in a comprehensive way, so as to align all categories of staff (civil servants, temporary staff, contracted staff, interns) with merit-based and transparent recruitment principles. The Government should adopt the proposal of the amended framework and submit it for formal enactment in the Parliament.
- Widespread use of temporary employment outside the civil service system (i.e., hiring contracted staff) in the state administration results in a disproportionately high number of staff not subject to merit-based recruitment, who often conduct civil servants' tasks, although not allowed by law to do so. Furthermore, contracted staff are as a rule not

recruited through competitive procedures, nor are they subject to the salary rules that apply to civil servants, which compromises transparency and distorts the remuneration system, ultimately breaching the equal pay principle. The Government should introduce clear rules for hiring contracted staff outside the scope of civil service legislation, to prevent misuse of contracts and ensure they are subject to at least basic merit-based recruitment principles.

## METHODOLOGY APPENDIX

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

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

Monitoring heavily relied on the analysis of official documents publicly available on the websites of administration bodies and on the data and information contained therein. However, in cases where the data was not available, researchers sent requests for free access to information to relevant institutions in order to obtain information necessary for awarding points for the elements.

**Table 13. FOI requests sent in Serbia**

| Institution  | Date of request | Date of reply to the request |
|--|-----------------|------------------------------|
| Human Resource Management Service                      | 15.4.2025.      | 16.4.2025.                   |
|  | 5.5.2025.       | 5.5.2025.                    |
|  | 27.5.2025.      | 9.6.2025.                    |
|  | 4.6.2025.       | 11.6.2025.                   |
|  | 5.5. 2025.      | 9.5.2025.                    |
| Tobacco Administration                                 | 29.4.2025.      | 6.5.2025.                    |
|  | 19.5.2025.      | 20.5.2025.                   |
|  | 19.5.2025.      | 20.5.2025.                   |
| Ministry of Agriculture, Forestry and Water Management | 29.4.2025.      | 20.5.2025.                   |
|  | 19.5.2025.      | 29.5.2025.                   |
|  | 19.5.2025.      | 29.5.2025.                   |
| Ministry of Education                                  | 29.4.2025.      | 8.5.2025.                    |
|  | 19.5.2025.      | 26.5.2025.                   |
|  | 19.5.2025.      | 26.5.2025.                   |

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|--|--|--|
| Directorate for Measures and Precious Metals   | 29.4.2025.<br>19.5.2025.<br>19.5.2025. | 7.5.2025.<br>21.5.2025.<br>21.5.2025.  |
| Ministry of Information and Telecommunications | 29.4.2025.<br>19.5.2025.<br>19.5.2025. | 12.5.2025.<br>20.5.2025.<br>20.5.2025. |

Interviews with key informants were conducted and used as a base for point allocation for elements 1.8, 2.5, 3.11, 4.10 and 5.4. Additionally, they were used to collect qualitative, focused, and in-depth inputs on monitored phenomena. Interviews with other stakeholders (such as representatives of public administration bodies) were additionally used in the research to complement and verify otherwise collected data and findings. Selection of interviewees was based on purposive, non-probability sampling, targeting interlocutors based on their expertise on the topic.

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.8, 2.5, 3.11, 4.10 and 5.4 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

**Table 14. Interviews conducted in Serbia**

| Date       | Interviewees  |
|------------|---|
| 30.5.2025. | Key informant 1, non-state actors, expert in the Human Resource Management area |
| 13.6.2025. | Key informant 2, non-state actors, expert in the Human Resource Management area |
| 2.7.2025.  | Key informant 3, non-state actors, expert in the Human Resource Management area |



## List of interview questions

- **Element 1.8**

The following questions are used for point allocation for the element 1.8. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Publicly available reports and statistics on civil service are transparent.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Publicly available reports and statistics on civil service are comprehensive enough.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

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

1. How would you assess the quality and reliability of data published in official civil service reports?
2. Can citizens, the media, and civil society easily find and understand these reports?
3. Do the reports and statistics cover all relevant aspects of the civil service (such as recruitment, promotion, and staff turnover)?
4. Are there any critical data points missing from publicly available civil service reports? If so, which ones?
5. To what extent are the published data used to improve human resource management policies in the public administration?
6. How would you assess the usability and structure of the reports – are the data clearly presented and tailored to different audiences?
7. Is there room for improvement in the comprehensiveness and level of detail in these reports? If so, how?

- **Element 2.5**

The following questions are used for point allocation for the element 2.5. Point allocation is determined based fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Use of temporary hiring in civil service, such as fixed-term employment of civil servants, and hiring of contracted staff, is transparent.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Use of temporary hiring in civil service is, in practice, limited.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
3. To what extent do you agree with the following statement: **Use of temporary hiring in civil service is purposeful.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

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

1. In your opinion, is there sufficient publicly available information about temporary hiring in civil service?
2. Are there clear criteria and procedures for hiring temporary civil servants and contracted staff?
3. Do you think the selection process for temporary positions is adequately documented and communicated to the public?
4. In your opinion, what are the most common problems with using temporary hiring in civil service?

5. In your opinion, how frequently are fixed-term and contracted positions used compared to permanent employment? Are temporary positions primarily used to address short-term needs, or are temporary engagements sometimes becoming permanent roles instead?
6. Are there cases where temporary hiring is used beyond its intended scope?
7. What measures, if any, are in place to prevent excessive reliance on temporary staff in public administration?

- **Element 3.11**

The following questions are used for point allocation for the element 3.11. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Process of recruitment into civil service is based on merit.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Process of recruitment into civil service is transparent.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

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

1. Do you think the merit-based recruitment process in civil service is consistently applied in practice?
2. Do you consider the mechanisms in place to ensure that recruitment decisions are based on merit to be adequate and of sufficient quality?
3. Are there any factors that undermine merit-based recruitment in civil service?
4. How transparent are the selection criteria and procedures for civil service recruitment?

5. Do you consider that candidates have access to clear and detailed information about job openings and selection processes?
6. What challenges exist in making civil service recruitment fully transparent and merit-based?
7. How effective are appeal mechanisms for candidates who believe the recruitment process was unfair?
8. What improvements could be made to enhance both transparency and meritocracy in civil service recruitment?

- **Element 4.10**

The following questions are used for point allocation for the element 4.10. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Top managers (senior civil servants) are selected and appointed based on merit.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Top managers (senior civil servants) are sufficiently protected from undue political influences.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

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

1. How do you assess the process of selecting and appointing top managers in civil service?
2. Do you believe that the selection of senior civil servants is consistently based on merit rather than political considerations? How could the selection and appointment process for top managers be improved to ensure greater merit-based decision-making?

4. What safeguards are in place to ensure that top managers in civil service are selected based on their qualifications and experience?
5. In your opinion, is the current system for appointing senior civil servants transparent and fair?
7. In your opinion, how would you assess mechanisms for protection of top managers from undesirable political interference, if any?

• **Element 5.4**

The following questions are used for point allocation for the element 5.4. Point allocation is determined based on fully agree/tend to agree responses. For each question where all key informants fully agree/tend to agree with the statement, 1 point is allocated.

1. To what extent do you agree with the following statement: **Civil service remuneration (salary) system is transparent.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree
2. To what extent do you agree with the following statement: **Civil service remuneration system (salary) is sufficiently clear.**
  - a) fully disagree
  - b) tend to disagree
  - c) tend to agree
  - d) fully agree

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

1. How would you assess the transparency of the civil service remuneration system?
2. Do you consider the current salary system in civil service to be clear? Are the criteria for determining salaries and bonuses in civil service publicly available and easily accessible?
3. How do you evaluate the fairness of the civil service salary structure in relation to the duties and responsibilities of different positions?
4. In your opinion, is the civil service remuneration system regularly updated to reflect changes in the cost of living or other economic factors?

5. Are there mechanisms in place to ensure that the salary system remains equitable across different levels of civil service?
6. How is the transparency of the civil service remuneration system communicated to both current employees and potential candidates?
7. Do you think that the public is adequately informed about how civil service remuneration is structured and allocated?
8. What improvements, if any, would you suggest to make the civil service remuneration system more transparent and clearer for all stakeholders?

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

The survey was conducted between 15<sup>th</sup> and 19<sup>th</sup> of February 2025. The margin of error for the sample of 1006 citizens is  $\pm 3,52\%$ , at the 95% confidence level.

**Table 15: Public perception survey questions in the area of Public Service and Human Resource Management**

| Statement 2  | Strongly disagree | Disagree | Agree | Strongly agree | Don't know/No opinion |
|--|-------------------|----------|-------|----------------|-----------------------|
| Public servants are recruited through public competitions based on merit (i.e. best candidates are enabled to get the jobs).                                       | 1                 | 2        | 3     | 4              | 99                    |
| Statement 3  | Strongly disagree | Disagree | Agree | Strongly agree | Don't know/No opinion |
| One needs personal connections to get a job in the public administration in my country (i.e., family ties, kinship, friendship and similar)                        | 1                 | 2        | 3     | 4              | 99                    |
| Statement 4  | Strongly disagree | Disagree | Agree | Strongly agree | Don't know/No opinion |
| One needs political connections to get a job in the public administration (i.e., membership in political party/organisation, personal ties with political parties) | 1                 | 2        | 3     | 4              | 99                    |

## LIST OF REFERENCED SOURCES IN THIS REPORT

### ***Legal acts, by-laws and public policy documents***

Instructions for Producing and Publishing the Information Booklet, Official Gazette No. 10/2022. Available at: <https://tinyurl.com/mdnx5zus>.

Labour Law, Official Gazette No. 95/2018. Available at: <https://tinyurl.com/hramjdm5>

Civil Servants Law, Official Gazette No. 19/2025. Available at: <https://tinyurl.com/2wa4vwds>

Law on Free Access to Information of Public Importance, Official Gazette No. 105/2021. Available at: <https://tinyurl.com/4ub5s66w>.

Law on Salaries of Civil Servants and General Employees, Official Gazette No. 19/2025. Available at: <https://tinyurl.com/24e85cxv>

Law on the Budgetary System, Official Gazette No. 94/2024. Available at: <https://tinyurl.com/2mkywbs8>

National Academy for Public Administration. 2024. Ethics and integrity training programme for civil servants for 2024. Available at: <https://tinyurl.com/yc2c3tx3>

National Academy for Public Administration. 2025. General training programme for civil servants. Available at: <https://tinyurl.com/mryypfcc>

Regulation on the Central Personnel Registry, Official Gazette No. 3/2024. Available at: <https://tinyurl.com/2bzfw2nm>

Regulation on the Internal and Public Competitions for Filling Vacancies in State Authorities, Official Gazette No. 67/2021. Available at: <https://tinyurl.com/45br78uh>

Rules of Procedure of the Government, Official Gazette No. 8/2019. Available at: <https://tinyurl.com/56e5f4nb>

## **Reports**

European Commission, *Serbia Report 2024*, Available at: <https://tinyurl.com/bd3mncwy>

Ministry of Finance of Serbia. 2025. *Report on salaries per sectors and typical job positions*. Available at: <https://tinyurl.com/ajhyky5>

SIGMA/OECD. 2025. *Public Administration in Serbia 2024: Assessment against the Principles of Public Administration*. Available at: <https://tinyurl.com/3f9ua2pt>

## **Websites**

eGovernment Portal - <https://euprava.gov.rs/>

Human Resource Management Service (official website) - <https://www.suk.gov.rs/>

Ministry of Finance (official website) - <https://www.mfin.gov.rs/>

Ministry of Public Administration and Local Self-Government (official website) - <https://mduls.gov.rs/>

National Academy for Public Administration (official website) - <https://napa.gov.rs/>

Unified Information System of Information Booklets - <https://informatior.poverenik.rs/naslovna>





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