

PAR Monitor Report Serbia

ORGANISATION, ACCOUNTABILITY AND OVERSIGHT

2024/2025



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ABOUT WEBER 3.0

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

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

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

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



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



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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.

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

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

EXECUTIVE SUMMARY

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

Serbia has a comprehensive legal framework for freedom of information (FOI), which guarantees the right of individuals and legal persons to access public information without justification, ensures equal treatment of all requesters, and defines information of public importance in line with international standards. The Law on Free Access to Information of Public Importance (LFAl) establishes a broad system of procedural guarantees, including strict deadlines, prescribed response formats, cost-free access with limited exceptions related to reasonable costs e.g., for photocopying documents, mandatory written reasoning for refusals, and a detailed catalogue of exceptions, alongside provisions requiring partial disclosure of non-exempt information. It also establishes sanctions for non-compliance and an independent supervisory authority, the Commissioner for Information of Public Importance and Personal Data Protection (the Commissioner), mandated to oversee implementation and report annually to the National Assembly. Strategic documents partially support improvements in reactive transparency, primarily through the Public Administration Reform Strategy Action Plan (PAR AP) valid until 2025, which included measures to strengthen compliance and capacity of institutions, although the absence of a new action plan as of March 2026 indicates a gap in strategic continuity. The implementation of the FOI framework demonstrates generally strong procedural compliance, but more mixed results in terms of substantive access to information. During this PAR Monitor cycle, public authorities responded to 94.8% of all submitted FOI requests, with almost all responses provided within legal deadlines, in the requested format, and free of charge. However, nearly one quarter of responses did not contain the requested information, most commonly because authorities claimed that the requested data were not collected or provided only partial information, indicating shortcomings in record-keep-

ing and the effective implementation of FOI obligations. At the same time, the Commissioner demonstrates strong formal performance through timely annual reporting, including systematic reporting on FOI implementation and sanctions, and the provision of accessible citizen-oriented tools such as guides, fill-in forms supporting FOI rights exercise, and procedural materials. However, non-state actors and stakeholders consistently highlight weaknesses in practice, including limited effectiveness of sanctions, delays in complaint handling, inconsistent application of FOI exemptions, and uneven compliance with the Commissioner's decisions. Similarly, public perception data reveal a significant gap between high awareness of FOI rights among citizens (70%) and lower perceptions of institutional support (42%), suggesting that despite a robust legal and institutional framework, challenges persist in ensuring consistent substantive compliance and effective enforcement in practice.

The proactive transparency framework in Serbia rests on a relatively solid legislative foundation. The Law on State Administration, the LFAI, and the Law on eGovernment collectively establish obligations for public administration bodies to publish information on their work, produce information Booklets in machine-readable format, and make open data available on the Open Data Portal. However, as in the previous monitoring cycles, the assessment of practice across the sample of central state administration bodies reveals a significant gap between the legal framework and its implementation. The practice of proactive disclosure is highly unstandardised: information such as organigrams and work reports are consistently available, accessible, and timely, but others, such as contact information, information on public services, and impact assessments, are unevenly published and frequently outdated. Citizen-friendliness remains the weakest criterion across nearly all information types assessed, with none of the sampled bodies presenting budget information or work reports in a format adapted to a non-expert audience. Open data policy is inconsistently applied: only one of the five sampled bodies provides a link to the Open Data Portal on its website and while four sample bodies have published datasets on the Portal, the scope of published data remains limited and does not reflect the full range of their work. An assessment of high-value datasets against EU standards found compliant datasets in four out of six thematic categories, except for meteorological and mobility categories. Key informants confirmed the findings of the desk research, highlighting inconsistencies in structure of websites of public authorities, outdated content, and non-searchable file formats. Their stances point to a disconnect between the formal obligation to publish information and the institutional capacity or willingness to maintain that information in a usable form. Citizens' perception reinforces this picture, as only 38% of citizens agree or strongly agree that they can easily find information on the websites of public authorities, while 41% disagree or strongly disagree. A further 21% expressed no opinion, suggesting that a significant segment of the population does not engage with public authority websites at all.

The recommendations from this monitoring cycle focus on improving the annual reporting of the Commissioner for Information of Public Importance and Personal Data Protection through further disaggregation of data on the number of imposed and executed sanctions and on non-compliance with the legal provisions governing free access to information, such as the number of cases of administrative silence. Additionally, standardisation of public authority websites and the information presented on them is recommended, primarily through amendments to the current legal framework. Finally, the recommendations aim to improve open data policy and the practice of publishing open datasets by public authorities.

LIST OF ABBREVIATIONS AND ACRONYMS

CSO	Civil Society Organisations
LFAI	Law on Free Access to Information of Public Importance
MAFWM	Ministry of Agriculture, Forestry and Water Management
ME	Ministry of Education
MPALSG	Ministry of Public Administration and Local Self-Government
MS	Ministry of Sport
PAR	Public Administration Reform
ReSPA	Regional School of Public Administration
RGA	Republic Geodetic Authority
SIGMA/OECD	Support for Improvement in Governance and Management
TEN	Think for Europe Network

I. WeBER PAR Monitor: What we monitor and how

I.1 WeBER's approach to monitoring PAR

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

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

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

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

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

Table 1: Main changes in the PAR Monitor methodology

STRUCTURE

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

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

DATA SOURCES

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

PAR MONITOR REPORTING

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

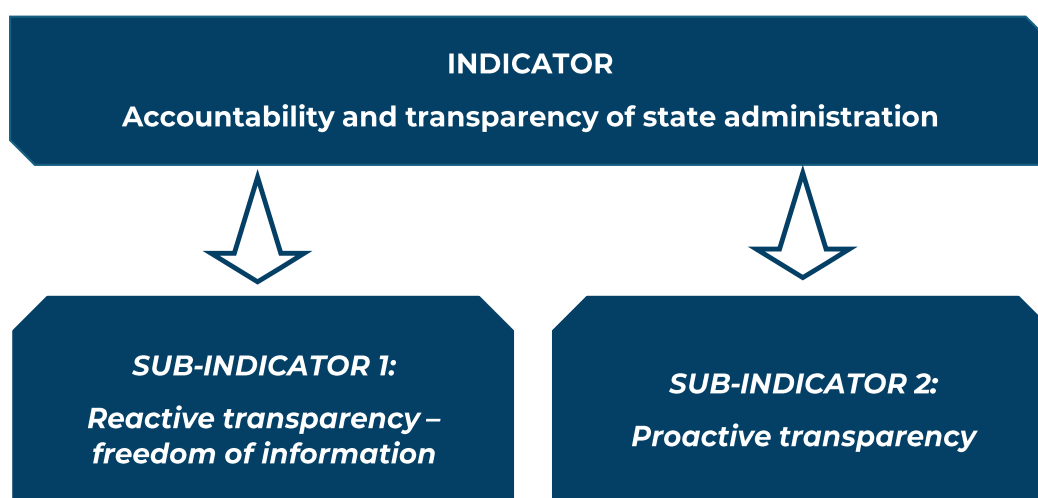
I.2 Why and how WeBER monitors the “Organisation, Accountability and Oversight” area

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

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

Principle 15: Public administration is transparent and open.

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



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

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

Table 2: Indicator elements under sub-indicator 1

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

The **second sub-indicator** assesses whether the strategic and legal frameworks enable proactive information provision, by analysing strategic documents and legal acts, while also focusing on how proactive informing is applied in practice by public authorities. Assessment of practice type elements, performed during the monitoring window for this area (April-May 2026), is conducted based on a sample of five public administration bodies:

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

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

Table 3: Indicator elements under sub-indicator 2

Indicator element: number and title	Type
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy
E 2.2 Regulation stipulates proactive transparency obligations	Legislation
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible, and citizen-friendly manner	Practice in implementation
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation
E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation
E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation

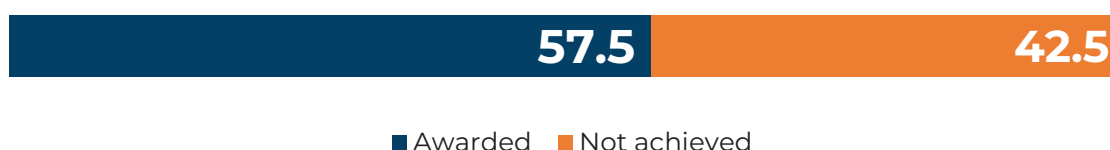
E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation
E 2.13 Public administration publishes high-value open datasets	Practice in implementation
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact

II. ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION

This section presents the assessment results for Serbia. Each sub-section presents the results for one sub-indicator (two in total), beginning with a brief overview of developments since the PAR Monitor 2021/2022. This is followed by a detailed assessment of the sub-indicator elements, starting with the policy, 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 Organisation, Accountability and Oversight area in Serbia, measured on a scale from 0 to 100 points.

Accountability and transparency of state administration
(score 0-100)



II.1 Reactive transparency – freedom of information

Principle 15: Public administration is transparent and open

***Awarded points per element in sub-indicator 1:
Reactive transparency – freedom of information⁵***

Indicator elements	Element type	Score
E 1.1 There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and policy	0.25/0.25
E 1.2 Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation	2.5/2.5
E 1.3 Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation	1.5/1.5
E 1.4 Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation	1/1
E 1.5 Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation	1/1
E 1.6 Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional set-up	1/1
E 1.7 Responses to FOI are provided in requested format	Practice in implementation	3.5/3.5
E 1.8 Responses to FOI are provided within legally stipulated deadlines	Practice in implementation	4/4
E 1.9 Responses to FOI are provided free of charge	Practice in implementation	4/4
E 1.10 Public authorities submit information that was requested	Practice in implementation	2/4

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

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

State of play

Assessments by SIGMA⁶ and the European Commission⁷ point to a generally strong legal and institutional framework governing access to public information in Serbia, while highlighting persistent challenges in its practical implementation. According to both sources, Serbia has a strengthened legal and institutional framework for access to information following the 2021 amendments to the LFAI. However, both reports highlight that the implementation of the law has been adversely affected by a sharp increase in appeals and complaints, reportedly linked to the misuse of legal remedies, placing significant pressure on the Commissioner's capacity and raising concerns about the effectiveness of enforcement mechanisms in practice.

⁶ SIGMA/OECD, Public Administration in Serbia 2024: Assessment against the Principles of Public Administration. Available at: <https://tinyurl.com/26pvjun3>.

⁷ European Commission, Serbia 2025 Report. Available at: <https://tinyurl.com/mwww8dv9f>.

PAR strategic framework in Serbia partially envisages improvements in the reactive transparency of public administration, primarily through measures to implement the legal framework for free access to information. The PAR AP, which was in force until 2025, included a measure that envisaged amendments to the LFAI⁸ to strengthen accountability and transparency in the work of public bodies, as well as activities aimed at strengthening the human resource capacities of the Commissioner for supervision over the implementation of the Law, with clearly assigned responsibilities for implementation.⁹ However, the expiry of the PAR AP in 2025, and the absence of a newly adopted Action Plan at the time of monitoring in March 2026, created a gap in the continuity of the strategic improvements in this domain.

The legal framework in Serbia guarantees individuals and legal persons the right to access public information without the obligation to justify their request, and it defines the scope and limitations of this right in line with international standards. The LFAI stipulates that requesters are not required to provide reasons for seeking access to information,¹⁰ while the right applies equally to all persons, regardless of citizenship, residence, or other personal characteristics.¹¹ The Law defines information of public importance broadly as information held by public authorities that the public has a legitimate interest in knowing.¹² The legal framework also prescribes exceptions to access to information, including the protection of national security, public safety, criminal proceedings, economic interests, confidential information, intellectual property rights, and environmental protection.¹³ In addition, the Law stipulates that parts of documents not covered by exceptions must be disclosed upon request.¹⁴ With these provisions, the legal framework establishes sufficiently broad guarantees for access to public information.

The legal framework further stipulates that responses to requests for free access to information should be submitted in the requested format, within prescribed deadlines, and generally free of charge, with limited exceptions related to material costs. The LFAI provides that authorities issue copies of documents containing the requested information in the form in which the information exists and, where possible, in the format requested by the applicant, including photocopies, audio,

8 Law on Free Access to Information of Public Importance, *Official gazette of RS* no. 120/04, 54/07, 104/09, 36/10, 105/21. Available at: <https://tinyurl.com/4j7fbzd2>.

9 Action Plan for the Period from 2021 to 2025 for the Implementation of the Public Administration Reform Strategy in the Republic of Serbia for the Period from 2021 to 2030, available at: <https://tinyurl.com/y7d8cvjc>.

10 Law on Free Access to Information of Public Importance, ar. 15.

11 Law on Free Access to Information of Public Importance, ar. 6.

12 Law on Free Access to Information of Public Importance, ar. 2.

13 Law on Free Access to Information of Public Importance, ar. 9.

14 Law on Free Access to Information of Public Importance, ar. 12.

video, or digital copies.¹⁵ The Law further stipulates that authorities are obliged to respond without delay and no later than within 15 days from the receipt of the request, while an extension of up to 40 days is permitted only in justified cases, provided that the applicant is informed of the reasons for the delay within seven days.¹⁶ Access to information through inspection of documents at the premises is free of charge, whereas applicants may be required to cover only the necessary material costs of reproducing or sending copies of documents, in accordance with the government-prescribed tariff. The Law also envisages exemptions from these costs for journalists, human rights organisations, and cases concerning the protection of public health and the environment.¹⁷ Overall, the legal framework provides comprehensive guarantees regarding the format, timeliness, and affordability of access to information, while allowing narrowly defined exceptions related to justified administrative expenses.

Furthermore, public authorities are obliged to disclose the grounds for refusing access to information. The LFAI provides that if an authority refuses to fully or partially grant access to the requested information, provide the requested document, or issue or send a copy of the document, it must adopt a formal decision rejecting the request without delay and no later than within 15 days from the receipt of the request.¹⁸ The decision must contain a written explanation of the reasons for refusal and inform the requester about the available legal remedies that may be used to challenge the decision. Thus, the legal framework establishes clear obligations for public authorities to justify refusals and ensure legal protection through the right to appeal.

Also, the LFAI stipulates sanctions as preventive measures against non-compliance with obligations related to FOI. It envisages enforcement measures against public authorities that fail to comply with the Commissioner's decisions, including the possibility for the Commissioner to impose fines on authorities through indirect coercion mechanisms.¹⁹ In addition, the Law prescribes misdemeanour liability for heads of public authorities in a wide range of cases related to violations of FOI obligations.²⁰ These include failure to provide accurate and complete information, refusal to receive requests, failure to maintain records of oral requests, non-compliance with the Commissioner's decisions, failure to publish and update information on the authority's work, failure to conduct employee training, non-submission of annual reports to the Commissioner, and obstruction of inspection supervision. In that sense, provisions on sanctions

¹⁵ Law on Free Access to Information of Public Importance, ar. 18.

¹⁶ Law on Free Access to Information of Public Importance, ar. 16.

¹⁷ Law on Free Access to Information of Public Importance, ar. 17.

¹⁸ Law on Free Access to Information of Public Importance, ar. 16.

¹⁹ Law on Free Access to Information of Public Importance, ar. 28a.

²⁰ Law on Free Access to Information of Public Importance, ar. 46.

against both public authorities and heads of authorities aim at strengthening institutional as well as accountability of heads of public authorities.

Table 4: Compliance of Serbia's legal framework with key FOI legal requirements

Legal requirement	Compliant
Legal right of individuals to access public information without justification	✓
Legal right of legal persons to access public information without justification	✓
Legal right extends to non-residents (individuals and legal persons)	✓
Legal framework defines all permissible exceptions to the right of access	✓
Legal framework requires partial disclosure of information not covered by exceptions	✓
Responses must be provided in the requested format	✓
Responses must be provided within the prescribed deadlines	✓
Responses are provided free of charge (except justified material costs)	✓
Grounds for refusal of access must be stated in writing	✓
Sanctions are envisaged for public authorities	✓
Sanctions are envisaged for heads of public authorities	✓

The legal framework further establishes a dedicated supervisory authority responsible for overseeing the implementation of and monitoring compliance with FOI obligations. The LFAI designates the Commissioner²¹ as an independent state body responsible for safeguarding and the right of access to information held by public authorities.²² In addition to its supervisory and enforcement functions, the Commissioner is legally mandated to report on the implementation of the LFAI. Specifically, the Commissioner is required to submit an annual report to the National Assembly within three months of the end of each fiscal year, providing information on the actions undertaken by public authorities in implementing the law, as well as on the Commissioner's own activities and expenditures.²³ With the introduction of the Commissioner, an independent mechanism with oversight and reporting functions, the legal framework has, together with sanctions for non-compliant authorities, embedded the necessary accountability and transparency safeguards for FOI.

21 See: <https://www.poverenik.rs/sr/>. At the time of drafting this report, the website of the Commissioner for Information of Public Importance and Personal Data Protection was temporarily unavailable. The analysis presented in this report is based on information and data that were publicly available on the website during the monitoring period.

22 Law on Free Access to Information of Public Importance, ar. 1.

23 Law on Free Access to Information of Public Importance, ar. 36.

The following sections present the findings on implementation of the legal framework provisions governing free access to information in practice. The assessment was based on the analysis of the sample of 58 FOI requests submitted during the entire PAR Monitor 2024/2025 cycle, between 22 October 2025 and 2 February 2026. The requests were addressed mostly to state administration bodies and were used to assess the extent to which legal requirements concerning access to information are implemented in practice.

The findings indicate a generally high level of compliance with procedural requirements. Responses were received for 55 out of 58 submitted FOI requests (94.8%). Of the 55 responses received, 42 contained the requested information, while in 13 cases (23.6%), authorities responded but did not provide the requested information, most commonly because they stated that they did not collect the requested data or provided only partial information. Only three requests out of the total remained unanswered (5.2%), constituting cases of administrative silence. Furthermore, only one request was formally rejected by the General Secretariat of the Government,²⁴ and only one response (1.8% of all responses received) was submitted after the legally prescribed deadline, while all responses were received free of charge. Among the cases in which information was disclosed, only one response (2.4%) was not delivered in the requested format, as the information was sent by post rather than electronically. Taken together, the findings suggest that public authorities generally comply with legal requirements concerning the timeliness, format, and cost of access to information. However, the relatively high proportion of responses in which no requested information was delivered – almost a quarter, indicates that public authorities inconsistently record and keep information from their work or simply do not abide by the FOI framework in full.

When it comes to the Commissioner's work, it regularly publishes annual reports on the implementation of FOI and the conduct of public authorities. Observed annual reports, for 2023, 2024 and 2025 were prepared and published within the prescribed timeframe, in March 2024, March 2025 and March 2026, respectively. The reports are publicly available on the Commissioner's website and contain statistical data on the application of FOI rights, the conduct of public authorities, and the handling of requests and complaints, accompanied by an overview of key findings and developments.²⁵ By demonstrating consistent compliance with reporting obligations, the Commissioner enables regular public scrutiny of the FOI application across the public administration.

²⁴ In this case, the authority requested an amendment to the request in question, arguing that the request concerned "information carriers" rather than information itself. Following the submission of an amended request on 20 February 2026, the request was ultimately rejected in its entirety as incomplete on 9 March 2026.

²⁵ See: <https://tinyurl.com/c84hz2s9>

In addition, the Commissioner's annual report includes information on both imposed and executed sanctions related to non-compliance with FOI obligations. For instance, the 2025 annual report provides aggregate data on misdemeanour proceedings initiated during the reporting period. The report also contains information on the outcomes of these proceedings as well as on instances where charges were not issued due to insufficient evidence, or the expiry of the statutory limitation period. While the report provides comprehensive information on the overall number and execution of sanctions, it does not systematically present sanction data broken down by individual public authorities or types of public authorities. That said, the reporting practices by the Commissioner provide a transparent though more general overview of sanctioning policy.

The Commissioner also publishes online a wide range of citizen-friendly resources and practical tools designed to facilitate the exercise of FOI rights. It provides on its website several types of guidance materials, including the *Brief Guide to the Right of Access to Information of Public Importance and the Protection of Personal Data*,²⁶ published in 2023, which addresses key questions related to the exercise of FOI rights in a concise and accessible manner. In addition, the website contains visual representations of the FOI procedure,²⁷ as well as multimedia guides,²⁸ explaining various aspects of the process. A comprehensive set of fill-in forms is available online too, covering various stages of the FOI procedure, including request forms, complaint forms for different grounds of appeal, and templates for initiating court proceedings against the Commissioner's decisions.²⁹ The reviewed resources and forms are aligned with the current legal framework governing access to information and reflect the applicable regulatory requirements. Overall, the Commissioner demonstrates a proactive approach to supporting citizens in exercising their rights by providing accessible, practical, and up-to-date guidance materials and tools.

However, key non-state actors expressed mixed views regarding the transparency of sanctions imposed by the Commissioner and were unanimous in assessing their effectiveness negatively.³⁰ While one interviewee fully agreed and another tended to disagree that sanctions are transparent, both considered them ineffective in improving compliance with FOI obligations. Interviewees acknowl-

26 See: <https://tinyurl.com/bdcrxhxy>

27 See: <https://tinyurl.com/3b939ffe>

28 See: <https://tinyurl.com/mrmz8xn7>

29 See: <https://tinyurl.com/53z5nffu>

30 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. Two non-state actors were interviewed for all statements. Key informant interviews were held on May 15th and May 20th, 2026. One key informant responded with fully agree and one responded with tend to disagree to the statement "Supervisory authority's sanctions are transparent." Two key informants responded with fully disagree to the statement "Supervisory authority's sanctions are effective."

edged that complaints submitted to the Commissioner are often resolved in favour of applicants, but stressed that lengthy complaint procedures, in some cases lasting more than two years, significantly reduce the practical value of such decisions. They attributed these delays primarily to the growing volume of complaints, including cases involving the misuse of access to information requests, and limited institutional capacities within the Commissioner's office. Both interviewees also questioned the deterrent effect of sanctions, noting that public authorities frequently continue to withhold politically sensitive information despite the existence of financial penalties, while enforcement mechanisms and the execution of the Commissioner's decisions remain weak. Additional concerns were raised regarding lengthy Administrative Court proceedings, the limited engagement of the Administrative Inspectorate in addressing substantive FOI violations, and the insufficient visibility of information on imposed sanctions, which is largely confined to annual reports. Overall, the interviewees find that, despite a generally transparent framework and active oversight by the Commissioner, the existing sanctioning system is largely ineffective in securing compliance with FOI requirements in practice.

A predominantly negative assessment was expressed by key non-state actors on how public authorities handle requests involving sensitive information and on the quality of reasoning provided in cases of refusal.³¹ Both interviewees fully disagreed that authorities adequately respond to such requests or properly justify refusals of access to information. They reported a clear pattern of inconsistency in the application of FOI exemptions across institutions, where technical compliance with procedural rules is often present, but substantive interpretation of legal provisions varies significantly. Requests related to politically sensitive issues, such as budgetary spending, were described as particularly vulnerable to incomplete, partial, or fully withheld responses, while non-sensitive requests tend to be processed more effectively. In cases of refusal, interviewees highlight that authorities are seen to rely on formal legal grounds but often without providing specific, case-based justification of harm, resulting in generic and insufficiently substantiated reasoning. In sum, interviewees perceive application as inconsistent and insufficiently effective in ensuring meaningful access to sensitive information and properly reasoned refusals.

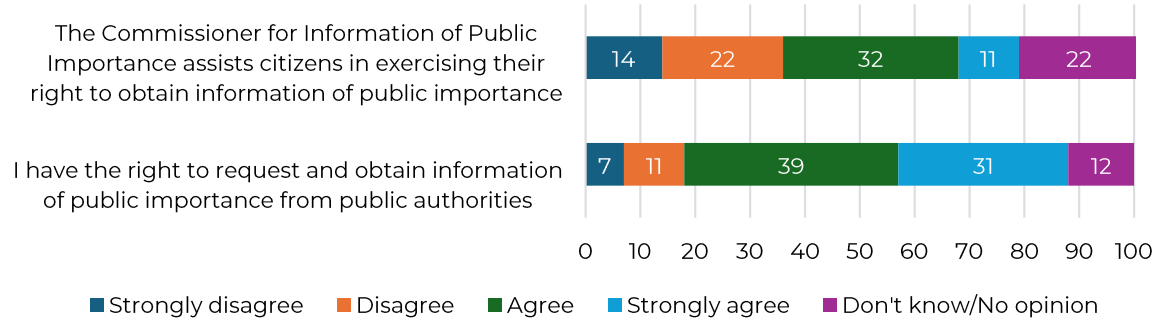
Finally, the public perception data indicates that awareness of the FOI rights is relatively well established among citizens in Serbia, with 70% of them agreeing that they have the right to request and obtain information from public authorities.³² However, confidence in the institutional support available for exercising

³¹ Key informants responded with fully disagree to the statement "Public authorities adequately respond to requests containing sensitive information" as well as to the statement "Public authorities properly act when refusing access to information."

³² 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.

this right is considerably lower with only 42% agreeing that the Commissioner assists citizens in obtaining information of public importance. The significant difference between awareness of the right itself and perceptions of institutional support points to a need for greater visibility and public understanding of the Commissioner’s mandate and functions. Without transparent and proactively advertised support channels and mechanisms, awareness of one’s rights alone cannot compensate for its smooth and effective implementation.

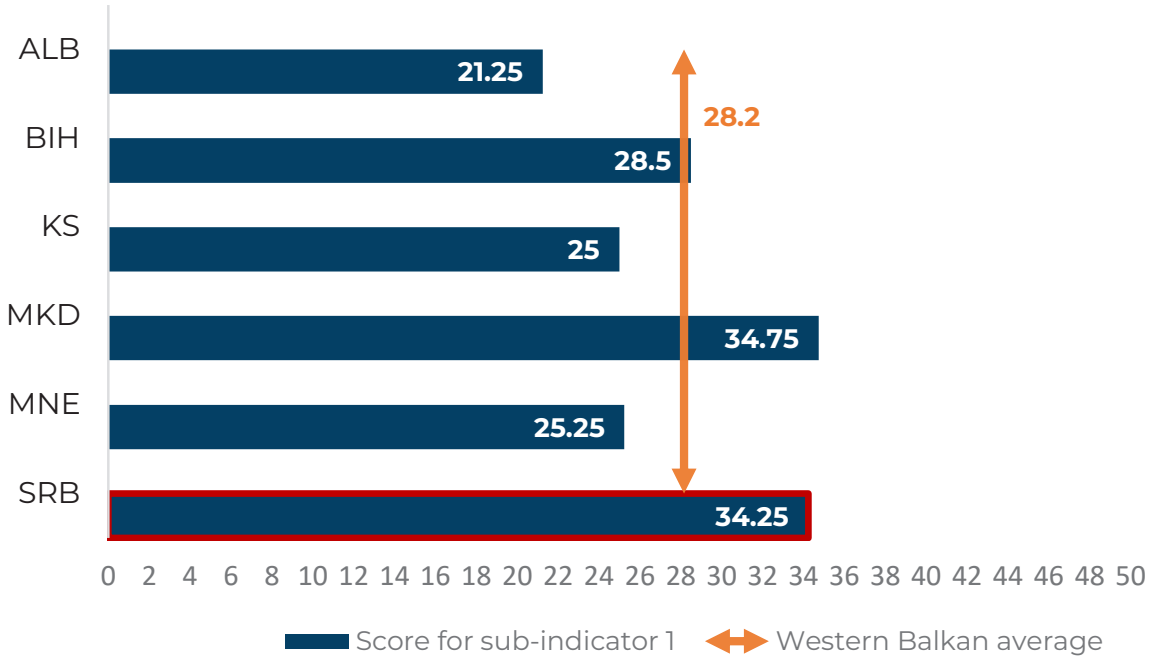
Chart 1: Share of citizens’ responses per agreement scale (%)



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



II.2 Proactive transparency

Principle 15: Public administration is transparent and open.

Awarded points per element in sub-indicator 2: Proactive transparency³³

Indicator elements	Element type	Score
E 2.1 There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and policy	0.25/0.25
E 2.2 Regulation stipulates proactive transparency obligations	Legislation	1.5/1.5
E 2.3 State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice in implementation	2/3
E 2.4 State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice in implementation	3/4
E 2.5 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice in implementation	0/4
E 2.6 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice in implementation	0/4
E 2.7 State administration bodies publish relevant reports on their work in a timely, accessible, and citizen-friendly manner	Practice in implementation	3/4
E 2.8 State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice in implementation	2/4
E 2.9 State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice in implementation	0/4
E 2.10 State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice in implementation	4/4

³³ The second sub-indicator focuses on the following SIGMA sub-principles: The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors; Public administration bodies proactively disclose public information, which is relevant, complete, accurate and up to date, accessible, understandable, machine-readable, in open-format and reusable.

E 2.11 State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice in implementation	4/4
E 2.12 State administration bodies publish data in open, machine-readable format	Practice in implementation	0/4
E 2.13 Public administration publishes high-value open datasets	Practice in implementation	3/4.5
E 2.14 Key non-state actors consider proactively published information as citizen-friendly	Outcomes and impact	0/3
E 2.15 Citizens' perception of accessibility of information on public authorities' websites	Outcomes and impact	0.5/2
Total score for sub-indicator 2		23.25/50.25

Since the previous monitoring cycle, SIGMA notes that the proactive transparency among state bodies was largely maintained through the publication of Information booklets of public authorities. However, ministries still face difficulties in upholding equally high standards of proactive disclosure with respect to their planning and reporting documents. At the same time, per SIGMA, citizens benefit from good availability of key datasets, including readily accessible consolidated legislation, major public registers, and statistics. The Open Data Portal offers over 2,000 data sets, with real-time and dynamic data covering areas such as air quality and public transport. However, certain important datasets are still not available in formats suitable for re-use or as real-time, dynamic datasets, and satisfaction among citizens and businesses with the public availability of important information and data held by public authorities stands at only around fifty percent.³⁴

The strategic framework for PAR, implemented in 2025, envisaged several activities devoted to the improvement of proactive transparency practices of public authorities. The Action Plan for 2021-2025 for the implementation of the PAR Strategy defines several activities with clearly assigned responsibilities: development of a manual/guidelines for managers on the positive effects of increasing transparency in the work and development of an e-Information Booklet for public administration bodies; development and updating of training modules on open data standards, their reuse and work with the Open Data Portal as part of the training programme for employees in state bodies and local self-government units and implementation of those training modules; development and adoption of an Action Plan for the implementation of the

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

Open Government Partnership initiative in Serbia for the period 2022-2024 and for 2024-2026.³⁵ These activities focus primarily on awareness-raising and training rather than on regulatory or enforcement measures, but are important for improving the practice of providing information to the public proactively.

Similarly, the legislative framework in Serbia provides the prerequisites for the proactive publication of information. The Law on State Administration establishes that publicity of work is one of the principles governing the functioning of state administration. It requires bodies to provide insight into their work to the public, in line with the law regulating free access to information of public importance. State administration bodies are also obliged to inform the public about their work through means of public information and other appropriate channels, while employees authorised to prepare such information are responsible for its accuracy and timeliness.³⁶

In addition to these general principles, the existing framework specifies what data and documents must be published. The LFAI mandates the preparation and publication of Information Booklets that inform on the work of all public authorities.³⁷ These Booklets must be published at least once a year and must contain the categories of information prescribed by the LFAI (such as organisation structure, budget, types of services offered, etc.).³⁸ The legislation further stipulates that Information Booklets should be produced in electronic, machine-readable form, using an Information System structured so that entered content can be automatically converted into machine-readable data. Finally, the Law on eGovernment requires authorities to publish open data

35 Specific objective 6 of the PAR Strategy is devoted to the area of Accountability, and within it, Measure 6.4 titled *Improving proactive publication of data held by public administration bodies*, envisages relevant activities. Available at: <https://monitoring.mduls.gov.rs/dokumenta.html>

36 Articles 11 and 76, Law on Public Administration, Official Gazette No. 79/2005-3, 101/2007-4, 95/2010-7, 99/2014-11, 30/2018-3 (other law), 47/2018-7. Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/79/1/reg>

37 Article 39, Law on Free Access to Information of Public Importance.

38 The following information must be presented: 1) description of the authority, obligations and organisational structure; 2) information on the budget and working capital; 3) information on the types of services the body directly provides to interested parties; 4) the procedure for submitting requests to the body, i.e. filing complaints against its decisions, actions or omissions; 5) a review of requests, complaints and other direct measures taken by interested parties, as well as decisions of the body regarding submitted requests and complaints, i.e. responses to other direct measures taken by interested parties; 6) information on the method and place of storage of information carriers, the type of information it possesses, the type of information it makes available, as well as a description of the procedure for submitting requests; 7) names of the heads of the state body and a description of their authorities and duties, as well as the decision-making procedures; 8) rules and decisions of a body concerning the public nature of the work of that body (working hours, address, contact telephone numbers, identification marks, accessibility for persons with special needs, access to sessions, admissibility of audio and video recording, etc.), as well as any authentic interpretation of those decisions; 9) rules and decisions on the exclusion and restriction of the public nature of the work of a state body, as well as their justification.

More details on which data should be present in the Information Booklet, and other relevant aspects, are available in the Instructions for Producing and Publishing Information Booklets, available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/drugidrzavniorganiorganizacije/uputstvo/2022/10/1/reg>

within the scope of their competence on the Open Data Portal, in a manner that enables easy search and reuse.³⁹ These provisions establish a relatively thorough set of obligations for proactive transparency, including requirements on the availability of information in open formats.

Against this legislative baseline, the assessment examined the extent to which public authorities fulfil these obligations in practice. The assessment of practice was based on a sample of five state administration bodies:

1. Ministry of Agriculture, Forestry and Water Management (MAFWM)
2. Ministry of Education (ME)
3. Ministry of Sport (MS)
4. Ministry of Public Administration and Local Self-Government (MPALSG)
5. Republic Geodetic Authority (RGA).

For each of these bodies, the following types of information were observed and assessed against the criteria of availability, accessibility, timeliness (update of information) and citizen-friendliness: information on the scope of work, policy documents and legal acts, public services, impact assessments and evaluations, work reports, budget information, contact information, organisational structure and on public consultation processes. The MS and RGA are the institutions for which the majority of assessed information fulfilled the criteria in most cases, while accessibility was the criterion that was most often met across all types of information. However, the analysis points to a highly unstandardised practice, as described below.

The presentation of results is divided into two groups of information for easier tracking of findings. The first group consists of information on the scope of work, on policy documents and legal acts, on public services, on impact assessments and evaluations and reports on their work, and the second group includes budget and contact information, organisational structure and public consultation processes.

Starting with the first group of information types, the sampled bodies display uneven performance against the four assessment criteria, with notable gaps in citizen-friendliness and timeliness. Information on the scope of work of the sampled bodies is available and accessible across the sample (within three or fewer clicks from the homepage), but citizen-friendliness is not consistently ensured (see Table 5 below). Information on policy documents and legal acts is available and citizen-friendly for four out of five bodies and accessible for all five, but up to date for only two, as authorities do not regularly update their websites with the latest versions of legal acts. Information on services offered by the sampled

³⁹ Article 27, Law on eGovernment, Official Gazette No. 27/2018-25. Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/27/4/reg>

bodies is available and accessible for three out of five bodies, but up to date only for the MS and citizen-friendly only for the RGA. Information on impact assessments and evaluations was assessed as unavailable since none had published such documents for all policy sectors within their scope of work. Where such documents were present, they were citizen-friendly and up to date in only two cases, while accessible in three. Reports on the work of the sample bodies were available, timely, and accessible across the sample, but none of the bodies presented the data in a citizen-friendly format, such as through graphs, infographics, or introductory sections explaining results in an accessible language. Overall, assessed information in this group is available and reachable, but not necessarily in formats accessible to a non-expert audience or up to date.

**Table 5: Public availability of information
on the work of public administration bodies**

Institution/ Criteria	MAFWM	ME	MS	MPALSC	RGA
<i>information on the scope of work</i>					
<i>available</i>	✓	✓	✓	✓	✓
<i>accessible</i>	✓	✓	✓	✓	✓
<i>citizen-friendly⁴⁰</i>	✗	✓	✗	✓	✓
<i>information on policy documents and legal acts</i>					
<i>available</i>	✓	✗	✓	✓	✓
<i>up to date⁴¹</i>	✓	✗	✗	✗	✓
<i>accessible</i>	✓	✓	✓	✓	✓
<i>citizen-friendly⁴²</i>	✗	✓	✓	✓	✓
<i>information on public services</i>					
<i>available</i>	✓	✗	✓	✗	✓
<i>up to date</i>	✗	✗	✓	✗	✗ ⁴³
<i>accessible</i>	✓	✗	✓	✗	✓

40 Citizen-friendliness in this regard means that the information is not copied and pasted from legislation; efforts are made to simplify information and publish it in language that is understandable to citizens.

41 Up to date means that the listed policy documents and legal acts are currently enforced.

42 Citizen friendliness means that policy documents and legal acts are listed within specifically dedicated website locations, are consolidated (regardless of whether amendments are published separately) and are downloadable.

43 RGA services are available only to lawyers, geodetic organisations, and other professional institutions; thus, it cannot be assessed if the services are up to date.

<i>citizen-friendly</i> ⁴⁴	X	X	X	X	✓
<i>information on impact assessments and evaluations</i>					
<i>available</i> ⁴⁵	X	X	X	X	X ⁴⁶
<i>up to date</i> ⁴⁷	✓	X	✓	X	X
<i>accessible</i>	✓	✓	✓	X	X
<i>citizen-friendly</i> ⁴⁸	X	✓	✓	X	X
<i>reports on the work of the bodies</i>					
<i>available</i>	✓	✓	✓	✓	✓
<i>timely</i> ⁴⁹	✓	✓	✓	✓	✓
<i>accessible</i>	✓	✓	✓	✓	✓
<i>citizen-friendly</i>	X	X	X	X	X

Looking into the second group, budget information was not assessed as fully available for two out of five bodies, although in four cases available budget data and documents were up to date for four (see Table 6 below). This information was accessible across the sample, but none of the bodies presented it in a citizen-friendly format. Contact information, including general as well as FOI contact points, was fully available for only two out of five bodies, though three had accessible contact sections. It was citizen-friendly only for the ME, while it could not be confirmed whether the contact details were up to date for any of the sampled bodies. Information on public consultation processes met all required criteria to a greater extent than other information types: it was available and accessible for all five bodies, and up to date and citizen-friendly for four. Finally, information on organisational structure was the category where all required criteria were met for all sampled bodies, with the exception of accessibility for the RGA. Overall, within this group of assessed information, practices are more divided – available organigrams and public consultation processes meet the required criteria almost

44 Citizen-friendly means that FAQ sections on services offered are available. Also, for e-services obtained through the central government portal (if existing), it is considered whether a clear information/redirection link to the portal is provided on the websites of the sample body.

45 Availability means that they are published for all policy sectors within a sampled body (at least one such document).

46 Since the RGA does not have policy making authority, the researchers checked if analyses on citizen feedback on service provision, on the quality of services provided and similar, are available online and meet other criteria.

47 Up to date means that there is at least one impact assessment/evaluation published in the last two calendar years.

48 Citizen-friendly means that such documents are listed within purposefully dedicated website locations and are downloadable.

49 Timely means that reports are published in line with legal deadlines, where applicable.

fully across the sample, while publication of budget and contact information is unevenly disseminated, particularly in terms of citizen-friendliness.”

**Table 6: Public availability of information
on the work of public administration bodies**

Institution/ Criteria	MAFWM	ME	MS	MPALSC	RGA
<i>budget information</i>					
<i>available</i> ⁵⁰	✓	✓	✗	✗	✓
<i>up to date</i>	✓	✓	✓	✗	✓
<i>accessible</i>	✓	✓	✓	✓	✓
<i>citizen- friendly</i>	✗	✗	✗	✗	✗
<i>contact information</i>					
<i>available</i>	✗	✓	✗	✓	✗
<i>up to date</i>	✗	✗	✗	✗	✗
<i>accessible</i>	✗	✓	✗	✓	✓
<i>citizen- friendly</i> ⁵¹	✗	✓	✗	✗	✗
<i>information on the organisational structure (organigrams)</i>					
<i>available</i>	✓	✓	✓	✓	✓
<i>up to date</i>	✓	✓	✓	✓	✓
<i>accessible</i>	✓	✓	✓	✓	✗
<i>citizen- friendly</i> ⁵²	✓	✓	✓	✓	✓
<i>Information on public consultation processes</i>					
<i>available</i>	✓	✓	✓	✓	✓
<i>up to date</i>	✓	✗	✓	✓	✓
<i>accessible</i>	✓	✓	✓	✓	✗
<i>citizen- friendly</i> ⁵³	✗	✓	✓	✓	✓

50 Available means that financial plans for the current year and financial reports for the previous year (or the last financial report that should be published in line with regulations) are available on websites.

51 Citizen-friendly means that there are dedicated sections on the website that present contact information (the website user does not have to search through document(s) or use a search engine to locate it).

52 Citizen-friendly means that charts are presented in a readable manner (names of units can be easily read etc.) and are downloadable.

53 53 Citizen-friendly means that all processes are listed within a dedicated website location.

The assessment across all categories shows that public authorities do not follow a unified approach to informing the public about their work. Rather than adhering to a common standard governing which information should be present and how it should be presented (in terms of both accessibility and citizen-friendliness), each body follows its own practice. Even basic information, such as contact details or descriptions of services, is not available across all observed bodies. This points to the need for centralised efforts to standardise the practices to ensuring they provide accurate, up-to-date information in language and formats appropriate for citizens.

A similar pattern of inconsistency is visible in the area of open data. The sampled bodies do not consistently publish open data on both their websites and the Open Data Portal, nor do they routinely link to the Portal from their websites. Only the ME includes a link to the Open Data Portal on its homepage banner.⁵⁴ When it comes to utilising the Open Data Portal for provision of open datasets, four sampled bodies have published datasets on the Portal, except for the MS.⁵⁵ However, while the Portal contains data for almost all sampled bodies, the findings again point to uneven practices: bodies differ in whether and how they make open data visible on their websites, whether by publishing datasets directly or by linking to the Portal, and in which data they make available as the scope of published data does not reflect the full range of their work. This indicates, again, uneven and unstandardised practices across the administration in terms of their approach to the open data policy.

To assess the quality and usability of open data in more detail, the assessment also examined the availability of high-value datasets in six thematic categories according to the EU framework: geospatial, earth observation and environment, meteorological, statistics, companies and company ownership, and mobility. The datasets in each category must be available free of charge, machine-readable, provided via APIs and provided as a bulk download, where relevant.⁵⁶ Datasets which met all required criteria were available in four out of six categories, excluding meteorological and data on mobility. In the geospatial area, a dataset called “Cadastral parcels, cadastral zoning - INSPIRE WFS service”, provided by the RGA, was available on the GeoSrbija Portal and met

⁵⁴ See at: <https://prosveta.gov.rs/>

⁵⁵ MAFWM: dataset titled Agricultural advisory and professional services contacts, available at: <https://data.gov.rs/sr/datasets/poljoprivredne-savetodavne-i-struchne-sluzhbe-srbije-kontakti/#resources>. ME: several datasets related to data on middle, elementary, higher, and dual education, e.g.: <https://data.gov.rs/sr/datasets/osnovno-obrazovanje-podatsi-o-broju-zaposlenikh/#resources>.

MPALSC: several datasets, e.g.: <https://data.gov.rs/sr/datasets/broj-zaposlenikh-i-radno-angazhovanikh-litsa-u-ministarstvu-drzhavne-uprave-i-lokalne-samouprave/>.

Republic Geodetic Authority: several datasets, e.g.: <https://data.gov.rs/sr/datasets/adresni-registar/>.

⁵⁶ For more information on the high-value data, categories and criteria, see the Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information, available at: <https://eur-lex.europa.eu/eli/dir/2019/1024/oj/eng>

all the abovementioned criteria.⁵⁷ For Earth observation and environment, all criteria were met for a dataset provided by the Environmental Protection Agency titled “Quality of Air – API”.⁵⁸ In statistics category, all criteria were met for a dataset “Population estimates, by age and sex, comparative overview at the municipal level” by the Statistical Office.⁵⁹ For companies and company ownership, all criteria were met for the dataset called “API for the Register of Companies” provided by the Business Register Agency on the Open Data Portal.⁶⁰ In the category of mobility, although there were some datasets available, they did not meet the required criteria, while for the meteorological category, no open datasets were found on the Open Data Portal, website of the Republic Hydrometeorological Service of Serbia or the Statistical Office of Serbia. With at least one compliant dataset identified in four out of six thematic categories, it can be concluded that Serbia has partially aligned with the EU high-value dataset framework, with gaps in the meteorological and mobility domains preventing closer alignment.

The findings from the desk research are largely corroborated by qualitative evidence. Key informants expressed divided views on the citizen-friendliness of information proactively published online by public authorities.⁶¹ One interviewee highlighted significant inconsistencies in the availability and accessibility of information across websites, noting that they differ considerably in structure, user-friendliness, and approaches to proactive disclosure, making it difficult for users to navigate and locate relevant information. The same interviewee identified open data as a particularly weak area, describing both the availability and quality of datasets as very poor. Overall, they emphasised that information disclosure practices vary substantially between institutions, reducing transparency, comparability, and ease of access for citizens and other users. Another interviewee noted some positive examples of standardised and easily accessible information, particularly regarding public services and the eGovernment portal but assessed overall data quality as inconsistent. Information is often outdated, non-uniform, and lacks clear time references. This interviewee identified the Government as particularly non-transparent, citing inconsistencies in the publication of annual work plans and a lack of transparency around Government sessions, including the absence of advance publication of agendas or access to supporting materials. They also highlighted

57 Available at: <https://metakatalog.geosrbija.rs/geonetwork/srv/srp/catalog.search#/metadata/e8012122-a498-426d-b4f8-edb93ddd9f7f>.

58 Available at: <https://data.gov.rs/sr/datasets/kvalitet-vazdukha-api/>

59 The link to the specific dataset can only be provided as CSV or Json. This is the link to the Statistical Office data portal, where datasets per SDGs are available: <https://opendata.stat.gov.rs/odata/>

60 Available at: <https://data.gov.rs/sr/datasets/api-za-registar-privrednikh-drushtava/>

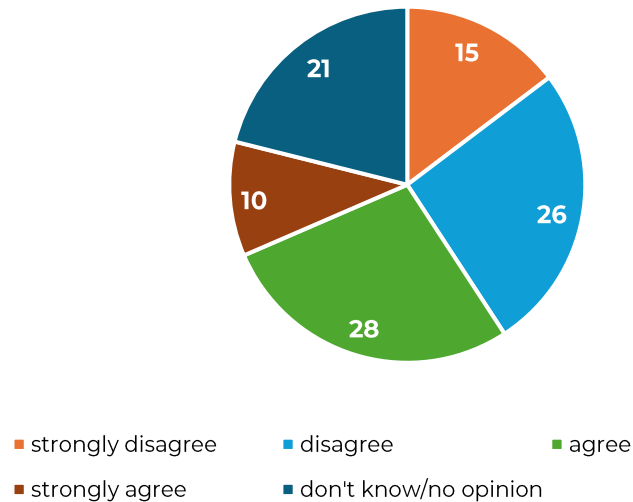
61 Key informant interviews were organised on the 15th and 20th of May 2026. To the statement “Public information that is proactively published online, on websites of public authorities, is citizen-friendly” one key informant chose to agree, and the other tend to disagree.

frequent technical barriers in accessing information, including broken links and documents published as PDF or image files, sometimes with non-searchable scanned pages, which significantly limit usability. These stances point to a disconnection between the legal obligation to publish information and the institutional capacity or willingness to make that information genuinely usable. The issues described by key informants suggest that proactive disclosure of information is often treated as a one-off activity, rather than a continuous obligation to maintain up-to-date and usable databases.

Citizens' perceptions confirm that these shortcomings are not only analytically observable but experienced in practice.⁶² Only 38% of citizens in Serbia agree or strongly agree that they can easily find the information they need on the websites of public authorities. Notably, the share of citizens who disagree or strongly disagree (41%) exceeds the share of those who agree or strongly agree, while a substantial proportion (21%) expressed no opinion. The fact that fewer than four in ten citizens perceive government websites as easily navigable suggests that the current approach to proactive disclosure is not achieving its intended purpose from the perspective of its primary audience. The share of those who chose "don't know/no opinion" as a response is equally important, since it shows that more than one in five respondents were unable or unwilling to assess the accessibility of information, which strongly suggests that a significant segment of the population does not engage with these websites at all. If a substantial portion of citizens are not reaching public authority websites in the first place (whether due to low awareness, lack of digital literacy, or a prior expectation that the information will not be useful), then proactive disclosure as currently practised is failing in terms of whether it reaches the public it is meant to inform. Addressing this requires looking beyond website design and toward broader questions of outreach, digital inclusion, and whether the current channels of proactive disclosure match the information-seeking habits of the population.

⁶² 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*.

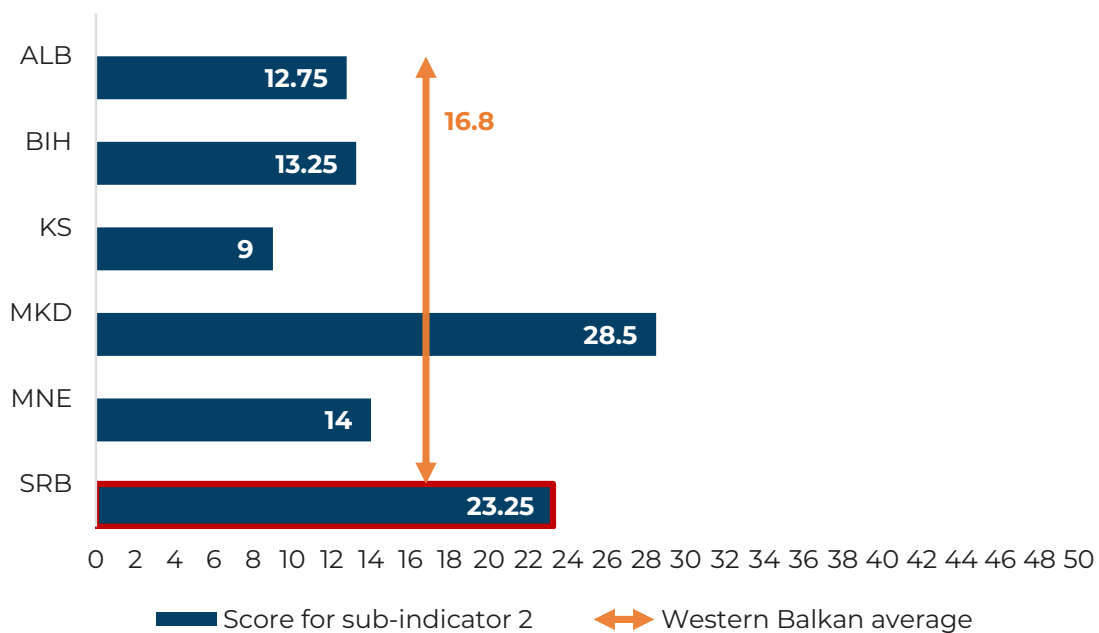
Chart 2: Share of citizens' responses on an agreement scale to the statement "I can easily find the information I need on the websites of public authorities and the Government." (%)



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

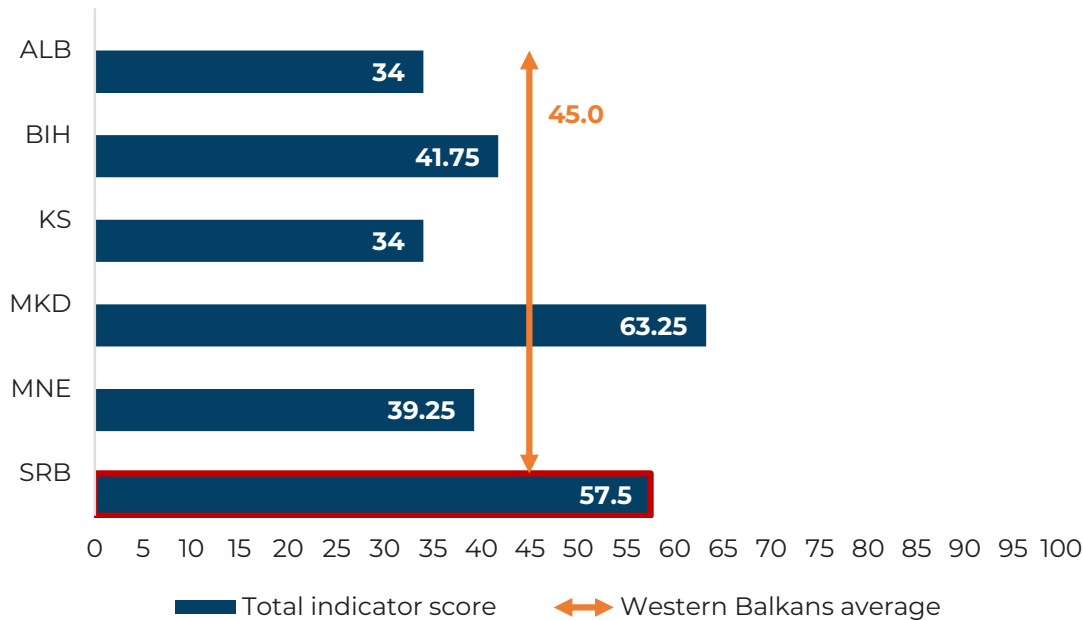
HOW DOES SERBIA DO IN REGIONAL TERMS?

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



**OVERALL SCORES COMPARISON IN THE ORGANISATION,
ACCOUNTABILITY AND OVERSIGHT AREA**

Indicator: Accountability and transparency of state administration



*Regional overview report for Organisation, Accountability and Oversight area,
with results for all WB administrations is available at: www.par-monitor.org*

II.5 Recommendations for the Organisation, Accountability and Oversight area

II.5.1 TRACKING RECOMMENDATIONS FROM PAR MONITOR 2021/2022

<i>Recommendations</i>	<i>Type (short term/medium term/long term)⁶³</i>	<i>Status</i>	<i>Explanation</i>
Public authorities at the state administration level should inform by using simple, citizen-oriented language on their websites, focusing on ease of access and better user experience. This should ideally be done by adopting, in the long term, a whole-of-government approach instead of the current approach in which each institution possesses its own website.	Short term	No action taken	A whole-of-government approach has not been adopted since the previous monitoring cycle. Each public administration body has its own webpage, and they are not necessarily uniform in terms of the visual presentation and the information they offer. Even though the Decree on Detailed Conditions for the Creation and Maintenance of a Web Presentation of Authorities has been in force since 2018, the analysis conducted during this cycle showed that public administration bodies do not have uniform webpages; thus, the use of citizen-friendly language is also not uniform.
When publishing documents (policy and legal documents, reports, etc.), public authorities should briefly introduce or explain their content and purpose without bureaucratic terminology, focusing on the most important aspects and how they affect the everyday life of citizens, associations, businesses, minority groups, or other groups in society.	Short term	No action taken	Sample public administration bodies whose websites were analysed during the assessment did not provide such introductions to documents published on their webpages. The main approach was publication of a list of all relevant documents with only their title.

⁶³ 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.

When providing information on organisational purpose and purview, describing policy areas, and offered services, or similar administrative information (either in the Information Booklets or otherwise online), public authorities should strictly avoid the copy-paste of texts from statutory acts, but tailor information to an average citizen.	Short term	Partially implemented	All five sample public administration bodies observed during this cycle provided citizen-friendly information on their organisational structure: Ministry of Agriculture, Forestry and Water Management, Ministry of Education, Ministry of Sport, Ministry of Public Administration and Local Self-Government and Republic Geodetic Authority. Three out of five sample public administration bodies provided citizen-friendly information on the scope of their work during this monitoring cycle: the Ministry of Education, the Ministry of Public Administration and Local Self-Government, and the Republic Geodetic Authority. Furthermore, the Republic Geodetic Authority provided citizen-friendly information on services they offer. However, the institutions lack a unified approach on this matter.
Public authorities at the state administration level should proactively publish their annual work reports online.	Short term	Fully implemented	For all five public administration bodies observed within the sample, annual work reports were available within the annual reports on the work of the Government. In this report, all individual public administration bodies have a dedicated section where the information on their work is presented.
Public authorities at the state administration level should start producing and publishing citizen-friendly versions of their annual budgets (financial plans).	Short term	No action taken	None of the public administration bodies analysed in this monitoring cycle published citizen-friendly information on their annual budgets.
Public authorities at the state administration level should start publishing at least one dataset pertaining to their scope of work in line with the open data standards.	Short term	Partially implemented	Four out of five sample public administration bodies provided datasets related to their work on the Open Data Portal: the Ministry of Agriculture, Forestry and Water Management, the Ministry of Education, the Ministry of Public Administration and Local Self-Government, and the Republic Geodetic Authority. Furthermore, the Ministry of Education provided a clear link to the Open Data Portal in the homepage banner. The Ministry of Sport is the only body that did not provide any open data during the monitoring period.

Public authorities at the state administration level should clearly display information on cooperation with civil society, and external stakeholders in general, preferably through an easily accessible section on the website's homepage.	Short term	No action taken	Observed public administration bodies do not have clearly displayed information on cooperation with civil society and external stakeholders in general on their homepages or sections devoted to contact information.
Public authorities at the state administration level should dedicate a separate website section for public consultations and public debates on policy documents and legislation. Alternatively, the authorities can provide a clearly visible link to a new eConsultation portal, as soon as it is made operational, where all public debates and consultations are supposed to be published.	Short term	Fully implemented	All observed bodies have sections on their websites dedicated to ongoing consultations and public debates for public policy documents and legal acts under their jurisdiction, although they mainly do not provide links to the processes on the eConsultation Portal.
To fully protect the FOI rights, changes to the FOI legislation in Serbia should ensure effective practical implementation of sanctions for all non-compliant authorities, and that the Commissioner's measures are adequately enforced.	Medium term	No action taken	The Law on Free Access to Information of Public Importance has not been amended since the previous monitoring cycle, i.e., since November 2021.
Regulation on closer conditions for creation and maintenance of web presentation of authorities from 2018 should be amended to include provisions defining the use of citizen-friendly language when communicating and releasing information through webpages.	Medium term	No action taken	The Regulation has not been amended since 2018. The current text does not touch upon the matter of the use of citizen-friendly language.
Public authorities at the state administration level that have appointed a contact person for cooperation with civil society, should clearly communicate this on their webpages – either by linking to existing database of contact points, or by providing information on contact person at a clearly visible online location.	Short term	No action taken	None of the observed public administration bodies refers specifically to a contact person for cooperation with civil society in the sections devoted to contact information.

A legally binding rule should be introduced for proactive and accessible publishing of all or most of the documents, data and information created in the work of public authorities, with limited, clear, and justified exceptions (open by default), including their publication in machine-readable format.	Medium term	No action taken	Since the last PAR Monitor 2021/2022, there have been no amendments to the legal framework in Serbia governing the proactive disclosure of information by the public administration bodies. As before, the Law on Public Administration states that one of the principles of the functioning of public administration is the publicity of work. Article 11 states that the work of public administration bodies is public, and that they are obliged to provide insight into their work to the public, in accordance with the law regulating free access to information of public importance. Furthermore, Article 76 (titled Informing the public about the work of public administration bodies) states that public administration bodies are obliged to inform the public about their work through public information media and in other appropriate ways, while employees authorised to prepare information and data related to informing the public are responsible for their accuracy and timeliness.⁶⁴ Law on Free Access to Information of Public Importance, in Article 39, mandates the preparation and publication of Information Booklets that inform on the work of the public administration body.⁶⁵ This Article mandates the publication of Information Booklets at least once a year and states that the following information must be present in the Information Booklet: 1) description of the authority, obligations and organisational structure; 2) information on the budget and working capital; 3) information on the types of services the body directly provides to interested parties; 4) the procedure for submitting requests to the body, i.e. filing complaints against its decisions, actions or omissions;
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64 Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2005/79/1/reg>

65 Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2004/120/7/reg/20100605>

		5) a review of requests, complaints and other direct measures taken by interested parties, as well as decisions of the body regarding submitted requests and complaints, i.e. responses to other direct measures taken by interested parties; 6) information on the method and place of storage of information carriers, the type of information it possesses, the type of information it makes available, as well as a description of the procedure for submitting requests; 7) names of the heads of the state body and a description of their authorities and duties, as well as the decision-making procedures; 8) rules and decisions of a body concerning the public nature of the work of that body (working hours, address, contact telephone numbers, identification marks, accessibility for persons with special needs, access to sessions, admissibility of audio and video recording, etc.), as well as any authentic interpretation of those decisions; 9) rules and decisions on the exclusion and restriction of the public nature of the work of a state body, as well as their justification. More details on which data should be present in the Information Booklet, and other relevant aspects, are available in the Instructions for Producing and Publishing Information Booklets.⁶⁶ The Instructions, in section II, state that the Information Booklet is a document that is produced in electronic and machine-readable form. Instructions further state that the Booklet is created and published within an Information System that is structured in such a way that the entered content can be automatically translated into machine-readable data. Finally, the Law on eGovernment, Article 27 stipulates the following: The authority is obliged to publish open data from the scope of its competence on the Open Data Portal in a manner that enables its easy search and reuse.⁶⁷
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⁶⁶ Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/drugidrzavniorganiorganizacije/uputstvo/2022/10/1/reg>

⁶⁷ Available at: <https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2018/27/4/reg>

II.5.2 RECOMMENDATIONS FROM THE 2024/2025 MONITOR REPORT

Recommendations from the monitoring cycle 2024/2025 for the Organisation, Accountability and Oversight 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

- Annual reports on the work of the Commissioner for Information of Public Importance and Personal Data Protection do not include data on the number of imposed and executed sanctions broken down by public authorities or by their types (including state administration bodies) but only provide aggregate figures. Starting from the next annual report, the Commissioner should provide this data disaggregated by one of these two categories, enabling a more detailed insight.
- Similarly, the Commissioner's annual reports do not provide disaggregated data per institution regarding non-compliance with the legal provisions governing free access to information, such as the number of cases of administrative silence. Starting from the next annual report, the Commissioner should provide such data per public authorities in order to enable stronger public scrutiny, at least for state administration and local administration bodies.

Medium-term recommendations

- The websites of public authorities are not standardised in terms of what data must be present and how it should be presented, resulting in uneven public disclosures on their work. Regulation on closer conditions for creation and maintenance of web presentation of authorities from 2018, in Article 8, prescribes only the homepage sections of the websites, but does not specify which type of information must be present in these sections. The Government should amend the Regulation to define all types of information that must be published on websites, regularly updated, and made accessible up to three clicks from the website (such as information on the consultation processes, on policy documents and legal acts, etc.). Furthermore, the Regulation should prescribe the use of citizen-friendly language in all communication and publication through websites.

- Open data policy is not fully developed or standardised across public authorities, as their websites largely do not refer to the Open Data Portal, even by way of a basic link. Moreover, although sampled bodies have published certain datasets related to their work on the Portal, in most cases, only a single dataset has been published, reflecting only a fraction of their work. To achieve better alignment with the open data policy, public administration bodies should start regularly publishing all relevant information on their work (such as service metrics, performance information, budget execution, statistics, etc.) in open formats on the Open Data Portal. Moreover, they should provide visible redirection links from their websites to such datasets on the Portal.

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.

For the assessment of the sample-based “practice in implementation” elements under sub-indicator 1 (1.7 – 1.11), a sample of **58 FOI requests** was used as a basis for analysis and point allocation. This sample consists of all FOI requests submitted to public authorities in Serbia during the 2024/2025 PAR Monitor cycle.

For the assessment of the sample-based “practice in implementation” elements under sub-indicator 2 (2.3 – 2.12), the assessment was based on reviewing a sample of websites of five public administration bodies:

1. Ministry of Agriculture, Forestry and Water Management,
2. Ministry of Sport
3. Ministry of Education
4. Ministry of Public Administration and Local Self-Government
5. Republic Geodetic Authority.

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

Key informant interviews were comprised of a set of up to four questions where the participants expressed their agreement on a four-point scale: fully disagree, tend to disagree, tend to agree and fully agree. Points under elements 1.15, 1.16, and 2.14 were allocated if all key informants stated that they tend to agree/fully agree with the statement. Additionally, a set of open-ended questions was used, allowing for a discussion with interviewees and on-the-spot sub-questions rather

than strictly following a predetermined format. Interviewees were given full anonymity in terms of personal information and institutional/organisational affiliation.

Table 7: Interviews conducted in Serbia

Date	Interviewees
15.05.2026.	Key informant 1
20.05.2026.	Key informant 2

List of interview questions

➤ **Element 1.15**

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

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

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

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

➤ **Element 1.16**

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

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

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

1. When it comes to exemptions when responding to FOI requests, are they typically justified clearly and specifically, or in a generic manner?
2. Do you consider that public authorities, or a certain body, extensively rely on confidentiality or other bases for exemption from providing information?
3. How effective is the appeal process in overturning unjustified refusals, and does the possibility of appeal influence the initial practice of individual bodies, in terms of deciding if and how they will respond to an FOI request?
4. How do authorities balance the protection of sensitive information with the public interest? Is there a standardised approach to classifying information as confidential or otherwise sensitive?
5. Are certain categories of information routinely treated as sensitive, even when disclosure might be justified?
6. Do authorities frequently provide partial access through redaction, or do they tend to refuse access in full?

➤ Element 2.14

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

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

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

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

The public perception survey 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 the 15th and 19th of February 2025. The margin of error for the sample of 1006 citizens is $\pm 3,52\%$, at the 95% confidence level.

Table 8: Public perception survey questions in the area of Organisation, Accountability and Oversight

Statement	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/No opinion</i>
I have the right to request and obtain information of public importance from public authorities.	1	2	3	4	99
Statement	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/No opinion</i>
I can easily find the information I need on the websites of public authorities and the Government.	1	2	3	4	99
Statement	Strongly disagree	Disagree	Agree	Strongly agree	<i>Don't know/No opinion</i>
The Commissioner for Information of Public Importance and Personal Data Protection assists citizens in exercising their right to obtain information of public importance.	1	2	3	4	99

LIST OF REFERECED SOURCES IN THIS REPORT

Legal acts, by-laws, and policy documents

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Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information. Available at: <https://eur-lex.europa.eu/eli/dir/2019/1024/oj/eng>

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

Websites

Commissioner for Information of Public Importance and Personal Data Protection - <https://www.poverenik.rs/sr/>

Ministry of Agriculture, Forestry and Water Management - <https://minpolj.gov.rs/>

Ministry of Education - <https://prosveta.gov.rs/>

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

Ministry of Sport - <https://www.mos.gov.rs/>

Open Data Portal - <https://data.gov.rs/sr/>

Republic Geodetic Authority - <https://www.rgz.gov.rs/>



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