

Area 4: Organisation, Accountability, and Oversight

INDICATOR	ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION
Sub-indicator 1	Reactive transparency - freedom of information (FOI)
Sub-indicator 2	Proactive transparency
Annexes	FOI requests; Questionnaire for key informants' interviews

SIGMA PRINCIPLES AND SUBPRINCIPLES MONITORED

P15. Public administration is transparent and open.

- a. The government has established strategic objectives to promote openness and transparency of public administration, assigning clear responsibilities to specific actors
- b. Individuals, including non-residents, and legal persons have the legal right to access public information without justifying their request.
- c. 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.
- d. 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.
- e. 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.
- f. Responsibility for monitoring compliance with the legislation on public information, providing guidance and imposing sanctions is clearly assigned and implemented.
- i. 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.

INDICATOR	ACCOUNTABILITY AND TRANSPARENCY OF STATE ADMINISTRATION		
General methodological remarks	<i>For the sub-indicator 1, the entire body of FOI requests submitted during the entire PAR Monitor cycle is used as a sample at the country level, for point allocation purposes under Elements 1.7-1.11.</i>		
	<i>For the sub-indicator 2, the same sample of central administration bodies is used for point allocation under Elements 2.2-2.11. The sample consists of five central state administration bodies: three line ministries (1 large, 1 medium, 1 smaller, in terms of thematic scope); a ministry with general planning and coordination function; and a central-level service provider that is not a ministry, and who delivers public services to citizens (or citizens and businesses). Unless specified otherwise, general criteria for the assessment of proactive transparency practices of sampled bodies under Elements 2.2-2.11 include availability, accessibility, citizen friendliness, and whether information is up to date.</i>		
	<i>For the Outcome and Impact type of elements, 3 interviews with key informants are envisaged as a rule. Unless specified otherwise in the methodology of individual elements, the same interviews with key informants should be used to allocate points in all such elements. For the Outcome and Impact elements 1.17, 1.18 and 2.14, points are awarded based on the results of the public perception survey conducted within the scope and for the purpose of the monitoring cycle. The public perception survey was conducted from 1st of February until the 26th of February across all six Western Balkans administrations on a representative sample.</i>		
	<i>If no information which is critical for point allocation can be obtained either through the review of websites stated in the data sources, or through the submission of FOI requests, research should hold interviews with the responsible central state administration bodies to obtain missing data (unless it is clear from point allocation guidelines that points are allocated solely on public availability of required information).</i>		
Sub-indicator 1	Reactive transparency - freedom of information (FOI)		
Element 1.1	Formulation	Type	Data source
<i>SIGMA Principle P15.a</i>	There is a strategic document in force that envisages improvements in reactive transparency of state administration	Strategy and Policy	PAR Strategic framework
	Methodology		Point allocation
	Review of valid government strategic document at the time of measurement (strategy, programme or similar) to determine whether improvements in reactive transparency of state administration work are foreseen (reactive information provision, in response to FOI requests), as a key prerequisite for accountability. Researchers identify relevant sections in the analysed strategic documents that contain information on goals, and specific measures or activities, with clear assignment of responsibilities. If no strategic document envisages actions towards improvements in reactive transparency, no points are awarded.		0.25 - Measures or activities for improving reactive transparency envisaged, with clear assignment of responsibilities <i>Maximum score: 0.25</i>
Element 1.2	Formulation	Type	Data source

<i>SIGMA Principle P15.b, c</i>	Regulations stipulate legal right of individuals and legal persons to access public information without justifying their request	Legislation	Laws and bylaws regulating FOI
	Methodology		Point allocation
	Review of valid regulations at the time of measurement to determine whether legal framework stipulates free access to all information held by public authorities, or legal persons who exercise public authority, and free access by any interested third party without limitations or justifications (natural or legal persons). Also, regulations should clearly stipulate exceptions to free access to information, which should be limited to the following: 1. national security, defence and international relations; 2. public safety; 3. the prevention, investigation and prosecution of criminal activities; 4. disciplinary investigations; 5. inspection, control and supervision by public authorities; 6. privacy and other legitimate private interests; 7. commercial and other economic interests; 8. the economic, monetary and exchange rate policies of the State; 9. the equality of parties in court proceedings and the effective administration of justice; environment; or 10. the deliberations within or between public authorities concerning the examination of a matter.¹ Also, legal framework should clearly stipulate that parts of the document/information not covered by any exceptions must be disclosed upon request.		0.5 – legal framework stipulates legal right of individuals to access public information without justification 0.5 – legal framework stipulates legal right of legal persons to access public information without justification 0.5 – legal right is granted to non-residents (individuals and legal persons) 0.5 – legal framework stipulates all exceptions to legal right 0.5 – legal framework stipulates that parts of the document/information not covered by exception are to be released <i>Maximum score: 2.5</i>
Element 1.3	Formulation	Type	Data source
<i>SIGMA Principle P15. C,d</i>	Regulations stipulate submission of responses to FOI requests in requested format, within prescribed deadlines, and free of charge	Legislation	Laws and bylaws regulating FOI
	Methodology		Point allocation
	Review of valid regulations at the time of measurement to determine whether legal framework stipulates submission of responses to FOI: 1. In requested format		0.5 – submission of responses in requested format stipulated

¹ Council of Europe Convention on Access to Official Documents Tromsø, 18. VI. 2009

	2. Within prescribed deadlines, and 3. Free of charge (excluding justified costs, such as, for making photocopies/printouts, and not for the provision of information itself). In addition, and for narrative purposes, researchers note any exceptions to the rules, if any, and their justification.		0.5 – submission of responses within prescribed deadlines stipulated 0.5 – free of charge submission of responses stipulated <i>Maximum score: 1.5</i>
Element 1.4	Formulation	Type	Data source
<i>SIGMA Principle P15.e</i>	Regulations stipulate obligatory disclosure of grounds for refusal of access to information	Legislation	Laws and bylaws regulating FOI
	Methodology		Point allocation
	Review of valid regulations at the time of measurement to determine whether legal framework stipulates that holders of public information need to disclose grounds for refusal of access to information. In addition, and for narrative purposes, researchers note any exceptions to the rules, if any, and their justification.		1 – obligatory disclosure of grounds for refusal of access to information stipulated <i>Maximum score: 1</i>
Element 1.5	Formulation	Type	Data source
<i>SIGMA Principle P15.b, c</i>	Regulations stipulate sanctions, as preventive measures against non-compliance with FOI	Legislation	Laws and bylaws regulating FOI
	Methodology		Point allocation
	Review of valid regulations at the time of measurement to determine whether legal framework stipulates sanctions for non-compliance with the FOI requirements. In addition, and for narrative purposes, researchers note type and range of sanctions (e.g., if financial penalties are envisaged, what is the range of fines and for what types of breaches or misdemeanours). Point allocation is determined based on the two criteria - if sanctions are envisaged against all holders of public information (public authorities), and if are sanctions envisaged against persons responsible for the entire organisation (heads of authorities), half a point each. If other subjects of sanctions are envisaged, e.g., against authorised persons for receiving, processing and responding to FOI requests, researchers note them in the assessment narrative.		0.5 – sanctions envisaged against all holders of public information 0.5 – sanctions envisaged against persons responsible for the entire organisation (heads) <i>Maximum score: 1</i>
Element 1.6	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Regulations establish a supervisory authority that is mandated to monitor FOI rights and reports on its implementation	Institutional setup	Laws and bylaws regulating FOI
	Methodology		Point allocation

	Review of valid regulations at the time of measurement to determine whether legal framework establishes a supervisory authority, with competences to monitor FOI rights application, and report on its implementation on an annual basis.		0.5 – supervisory authority responsible for monitoring FOI rights implementation established 0.5 – supervisory authority is mandated to report on FOI rights implementation on an annual basis <i>Maximum score: 1</i>
Element 1.7	Formulation	Type	Data source
<i>SIGMA Principle P15. C</i>	Responses to FOI are provided in requested format	Practice	Sample of FOI requests submitted during monitoring cycle
	Methodology		Point allocation
	Review of responses to all FOI requests submitted during the ongoing PAR Monitor cycle to determine whether requested information is provided in the requested format (photocopy, digital copy, audio/video copy, etc.). If different format than requested was used, responses to requests need to clearly state that public authority does not have the technical capabilities to allow access to information in requested format. In addition, and for narrative purposes, researchers cite law provisions relevant to this Element. If public authorities responded to fewer than 90% of the total submitted requests, this element is automatically zero. <i>Note: for the purpose of point allocation, no complaints/appeals need to be submitted to responsible supervisory authorities for cases of administrative silence, and researchers keep track of requests which were not responded to within legal deadlines.</i>		1.75 – FOI requests were responded to (90% minimum threshold) 1.75 – FOI requests were responded in requested format (90% minimum threshold), except for justified exceptions in which public authorities clearly indicated lack of technical/logistical capabilities for doing so <i>Maximum score: 3.5</i>
Element 1.8	Formulation	Type	Data source
<i>SIGMA Principle P15. D</i>	Responses to FOI are provided within legally stipulated deadlines	Practice	Sample of FOI requests submitted during monitoring cycle
	Methodology		Point allocation
	Review of responses to all FOI requests submitted during the ongoing PAR Monitor cycle to determine whether requested information is provided within legally stipulated deadlines, including the legally stipulated extended deadline , if applicable.		4 – FOI requests were responded within legally stipulated deadlines (90% minimum threshold) <i>Maximum score: 4</i>

	If public authorities have used extended deadlines to formally respond to requests, researchers analyse, for narrative purposes, whether for each such case advance notification was sent. In addition, and for narrative purposes, researchers cite law provisions relevant to this Element. If public authorities responded to fewer than 90% of the total submitted requests, this element is automatically zero.		
Element 1.9	Formulation	Type	Data source
<i>SIGMA Principle P15. D</i>	Responses to FOI are provided free of charge	Practice	Sample of FOI requests submitted during monitoring cycle
	Methodology		Point allocation
	Review responses to all FOI requests submitted during the ongoing PAR Monitor cycle to determine whether public authorities provide information free of charge. This excludes justified costs, e.g., for making photocopies/printouts, and not for the provision of information itself (e.g., electronic copies should be free of charge, as well as reviewing the documents at the premises of the institution). In addition, and for narrative purposes, researchers cite relevant legal provisions on charging for FOI requests, if applicable, and under what conditions they apply. If public authorities responded to fewer than 90% of the total submitted requests, this element is automatically zero.		4 – Information was provided free of charge except for justified costs (90% minimum threshold) <i>Maximum score: 4</i>
Element 1.10	Formulation	Type	Data source
<i>SIGMA Principle P15. D</i>	Public authorities submit information that was requested	Practice	Sub-sample of FOI requests submitted during monitoring cycle
	Methodology		Point allocation
	Based on the list of submitted FOI requests analysed in the elements 1.7-9, an entire sample of formal responses is analysed for their content, i.e., whether contents of responses match entirely (quantitatively and qualitatively) with the initial requests. Responses that only confirm the receipt of FOI requests are not considered. In cases where the response to the FOI indicates that the requested information is available online, researchers determine whether precise guidance for identifying information was provided (for example, a reference to a homepage is not considered precise guidance but rather the exact link(s) where the information is placed).		2 – more than 60% but less than 90% of responses contained information that was requested OR 4 – at least 90% of responses contained information that was requested <i>Maximum score: 4</i>

Element 1.11	Formulation	Type	Data source
<i>SIGMA Principle P15. E</i>	Public authorities communicate grounds for refusal of access to information	Practice	Sample of FOI requests submitted during monitoring cycle
	Methodology Review of responses to all FOI requests submitted during the ongoing PAR Monitor cycle to determine whether public authorities provide reasons for refusing access to information, in cases where access was denied. Researchers determine the number of refused requests, and the existence of clear elaborations for each. In cases of unclear, or insufficiently elaborated reasoning, researchers consult legal framework to determine whether elaborations on refusals are justified and consult internally within the team. If no refusal was issued for the entire body of FOI requests sent during the monitoring cycle, this element automatically receives maximum points. For the purpose of this element, administrative silence will be considered as a refusal with no justification. In addition, and for narrative purposes, researchers cite relevant legal provisions on grounds for refusal of access to information and way of communicating them to requesting persons or entities.		Point allocation 4 – Grounds for refusal communicated in all cases where access was denied, OR no refusals in the entire body of analysed requests <i>Maximum score: 4</i>
Element 1.12	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Supervisory authority regularly publishes annual reports on application of freedom of information	Practice	Website of supervisory authority for FOI
	Methodology Review of websites of supervisory authorities for FOI to determine whether they regularly publish annual work reports that cover the application of FOI rights and conduct of public authorities. Regularity is defined as online availability of annual reports for the last three annual reports in line with the stipulated legal deadlines for their publication.		Point allocation 1.5 – First annual report was published 1.5 – Second annual report was published 1.5 – Third annual report was published <i>Maximum score: 4.5</i>
Element 1.13	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Supervisory authority's annual reports include information on imposed and executed sanctions	Practice	Website of supervisory authority for FOI Supervisory authorities' annual reports
	Methodology Review of the last available annual report identified in the Element 1.12, to determine whether supervisory authorities report on sanctions for the reporting period. Specifically, if reports contain information on: 1. Number of imposed and executed sanctions at the level of all public authorities (grand total)		Point allocation 2 – annual report contains information on the total number of imposed and executed sanctions 2 – annual report contains information on the number of imposed executed sanctions

	2. Number of imposed and executed sanctions per individual public authorities or per type of public authority (state administration bodies included). In addition, and for narrative purposes, researchers note comments and remarks made by supervisory authority on implementation on sanctions for non-compliance with FOI requirements. If the report includes no sanctions that have been imposed (and executed), maximum points are awarded. However, if supervisory authority was inactive in the observed period, or no annual report was produced, zero points are automatically awarded.		per individual public authorities or per type of public authority (state administration bodies included) <i>Maximum score: 4</i>
Element 1.14	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Supervisory authority proactively publishes up-to-date citizen-friendly resources and fill-in forms for freedom of information	Practice	Website of supervisory authority for FOI
	Methodology		Point allocation
	Review of websites of supervisory authorities for FOI to determine whether they publish updated citizen-friendly resources on freedom of information. Citizen-friendly resources are defined as documents and materials that should facilitate exercise of FOI by informing citizens on their rights and duties in a succinct and easy to understand format. These can include, but are not limited to: 1. Guidebooks for free access to information (how-to) 2. Multimedia guides for free access to information (how-to) 3. Schematic/visual illustrations of the free access to information procedure Additionally, researchers review websites of supervisory authorities for FOI to determine whether they publish fill-in forms for different steps of procedure (FOI request, complaint forms at least). In case of other examples that are not mentioned in the list, researchers will consult internally to align approaches. Citizen-friendly resources produced by non-state actors are considered for point allocation as long as they are available from the supervisory authority's website. For all available resources, it will be checked whether they are up to date, i.e., in line with valid regulations regulating FOI, and their amendments (if they are relevant).		1.5 – At least one citizen-friendly resource from the list (points 1 to 3) is proactively available 1.5 – Fill-in forms for different steps in FOI procedures are published 1.5 – Proactively published citizen-friendly resources and fill-in forms are up to date i.e., aligned with valid regulations on FOI <i>Maximum score: 4.5</i>
Element 1.15	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Key non-state actors consider supervisory authority's sanctions as transparent and effective	Outcomes and Impact	Key informants' interview
	Methodology		Point allocation

	Researchers conduct interviews with key informants to establish whether, in practice, supervisory authorities' sanctions are transparent, and effective. Non-state actors from civil society, academic community, professional organisations, media associations, investigative journalism outlets, as well as thematic experts can be considered for interviews. Researchers identify 3 key informants to interview. In addition to the conversation, result of which will be used to complement the assessment with qualitative insights, interview participants will be asked to fill in a short survey on the spot to express their position on the issue of transparency and effectiveness of supervisory authority's sanctions, using a four-point scale – fully agree, tend to agree, tend to disagree, fully disagree. Point allocation will be determined based on the ratio of positive responses/agreement. Interviewees respond to the following statements: To what extent do you agree or disagree with following: 1. Supervisory authority's sanctions are transparent. 2. Supervisory authority's sanctions are effective. <i>Note: The same interviews will be used for other elements in this indicator that are measuring outcomes and impact, unless otherwise specified.</i>		1.5 – all interviewees agree that supervisory authority's sanctions are transparent 1.5 – all interviewees agree that supervisory authority's sanctions are effective <i>Maximum score: 3</i>
Element 1.16	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	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	Key informants' interview
	Methodology		Point allocation
	Attitudes of key informants on responding to requests that contain sensitive information or refusing access to information, are assessed via the same key informant interviews, and using the same methodological approach, from the Element 1.15. Interviewees respond to the following statements: To what extent do you agree or disagree with following: 1. Public authorities adequately respond to requests containing sensitive information. 2. Public authorities properly act when refusing access to information. Sensitive information will be interpreted to mean information that is relevant for public integrity safeguarding, such as but not limited to:		1.5 – all interviewees agree that public authorities adequately respond to requests containing sensitive information 1.5 – all interviewees agree that public authorities properly act when refusing access to information <i>Maximum score: 3</i>

	- Post employment integrity in practice (ministers, other top officials) - Lobbying activities - Financing of political parties and election campaigns - Conflict of interest in public sector, incl. asset declarations - Public procurement - Beneficial ownership in state-owned, or controlled entities - Competition protection and state aid - Government borrowing - Security and defence - Information that contains personal data etc.		
Element 1.17	Formulation	Type	Data source
<i>SIGMA Principle P15. B</i>	Citizens' perceived awareness of their right to access information of public importance	Outcomes and Impact	Public perception survey
	Methodology		Point allocation
	The results of the public perception survey are used as a basis for point allocation under this element. Researchers award points under this element based on the percentage of citizens who responded with "agree" and "strongly agree" to the following statement: I have the right to request and obtain information of public importance from public authorities.		0.5 – 20%-40% of respondents responded with "agree" or "strongly agree" OR 1 – 40%-60% of respondents responded with "agree" or "strongly agree" OR 1.5 – 60%-80% of respondents responded with "agree" or "strongly agree" OR 2 – more than 80% of respondents responded with "agree" or "strongly agree" <i>Maximum score: 2</i>
Element 1.18	Formulation	Type	Data source
<i>SIGMA Principle P15. F</i>	Citizens' perception of institutional support in exercising the right to access information of public importance	Outcomes and Impact	Public perception survey
	Methodology		Point allocation

	The results of the public perception survey are used as a basis for point allocation under this element. Researchers award points under this element based on the percentage of citizens who responded with “agree” and “strongly agree” to the following statement: The [institution in charge of overseeing the fulfilment of the right to access information of public importance] assists citizens in exercising their right to obtain information of public importance.		0.5 – 20%-40% of respondents responded with “agree” or “strongly agree” OR 1 – 40%-60% of respondents responded with “agree” or “strongly agree” OR 1.5 – 60%-80% of respondents responded with “agree” or “strongly agree” OR 2 – more than 80% of respondents responded with “agree” or “strongly agree” <i>Maximum score: 2</i>
SUBTOTAL POINTS			49.75
Sub-indicator 2	Proactive transparency		
Element 2.1	Formulation	Type	Data source
SIGMA Principle P15.a	There is a strategic document in force that envisages improvements in proactive transparency of state administration	Strategy and Policy	PAR Strategic framework
	Methodology		Point allocation
	Review of valid government strategic document at the time of measurement (strategy, programme or similar) to determine whether improvements in proactive transparency of state administration work are foreseen, as a key prerequisite for accountability. Researchers identify relevant sections in the analysed strategic documents that contain information on goals, and specific measures or activities, with clear assignment of responsibilities. If no strategic document envisages actions towards improvements in proactive transparency, no points are awarded.		0.25 - Measures or activities for improving proactive transparency envisaged, with clear assignment of responsibilities <i>Maximum score: 0.25</i>
Element 2.2	Formulation	Type	Data source
SIGMA Principle P15. i	Regulation stipulates proactive transparency obligations	Legislation	Laws and bylaws regulating work of state administration bodies, and access to information in state administration/public sector
	Methodology		Point allocation

	Review of valid regulations at the time of measurement to determine whether there is a requirement on proactive transparency of state administration bodies, i.e., proactive disclosure of key information from their work. For point allocation, it will be specifically observed whether any existing rules on proactive transparency measures determine the way this legal requirement should be implemented and whether proactive transparency means publishing of information in open, machine-readable format. In addition, and for narrative purposes, researchers cite relevant provisions that stipulate type of information that should be proactively made available as per legal framework.		0.5 – legal framework stipulates general proactive transparency requirement for state administration bodies 0.5 - legal framework clearly specifies which types of data and documents need to be published 0.5 – legal framework stipulates that public information needs to be available in open, machine-readable format <i>Maximum score: 1.5</i>
Element 2.3	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible, and citizen-friendly information on scope of work	Practice	Websites of sampled bodies
	Methodology		Point allocation
	Assessment is conducted based on review of official websites of five state administration bodies: - Three line ministries (1 large, 1 medium, 1 smaller in terms of thematic scope) - A ministry with general planning and coordination function, - A central-level service provider that is not a ministry, and who delivers public services to citizens (or citizens and businesses). Scope of work is defined as official scope of work (purview) of state administration body that is defined by valid regulations at the time of measurement. Criteria definition: - Availability – if description of the scope of work is available on the sample body's websites - Accessible – if information is not more than three clicks away from the homepage - Citizen friendly – not copy-pasted from legislation; efforts are made to simplify information and publish it in language that is understandable to citizens. The same sample of observed bodies will be used as a basis for point allocation for elements 2.3 – 2.12.		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 3</i>
Element 2.4	Formulation	Type	Data source

<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, citizen-friendly and easily accessible information on policy documents and legal acts under their competence	Practice	Websites of sampled bodies
	Methodology Relevant policy documents and legal acts are defined as strategic documents and primary and secondary legislation adopted under the competence of sample bodies. If a sample body does not perform policy making function (e.g., service delivery institution), researchers consider the legal acts on which their competences and procedures they implement are based. Criteria definition: - Availability, if lists (inventory) of policy documents and legal acts relevant to policies under their competence is available at official websites - Up to date, if listed policy documents and legal acts are currently enforced (verification to be done by cross-checking reference number and date of adoption with the versions published on the official gazette website). For sample bodies with smaller number of documents on websites, it will be checked if they are up to date by comparing them with versions available at the website of Official Gazette. For those with large number of documents, a sample of documents is randomly checked against the Official Gazette versions - Accessible, if information is not more than three clicks away from the homepage - Citizen friendly, if policy documents and legal acts are listed within specifically dedicated website locations, are consolidated (regardless of if amendments are published separately) and are downloadable.		Point allocation 1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>
Element 2.5	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on public services	Practice	Websites of sampled bodies
	Methodology Public services are defined as either electronic or traditional services offered by state administration bodies. Criteria definition: - Availability, if list of services offered is available at official websites - Up to date, if all listed services are currently available/possible to obtain - Accessible, if information on services is not more than three clicks away from the homepage		Point allocation 1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>

	- Citizen friendly, if FAQ sections on services offered is available. Also, for e-services obtained through central government portal (if existing), it is considered whether clear information/redirection link to the portal is provided on websites of sample body. Researchers perform check of regulation to ascertain that sample bodies provide services. If sample body does not provide services as per legislation, no points will be deducted.		
Element 2.6	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on impact assessments and evaluations	Practice	Websites of sampled bodies
	Methodology		Point allocation
	Researchers check the existence of impact assessment and evaluation documents (ex-ante or ex post), for policy areas under the competence of sample bodies. Criteria definition: - Availability, they are published for all policy sectors within a sampled body (at least one such document). - Up to date, if there is at least one impact assessment/evaluation published in the last two calendar years - Accessible, if information is not more than three clicks away from the homepage - Citizen friendly, if such documents are listed within purposefully dedicated website locations and are downloadable. In case of service providers, with no policy making authority, it will be considered if analyses on citizen feedback on service provision, on the quality of services provided and similar, are available online and meet other criteria.		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>
Element 2.7	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant reports on their work in a timely, accessible and citizen-friendly manner	Practice	Websites of sampled bodies Government website
	Methodology		Point allocation
	Work reports are defined as documents which are produced and published on an annual or multi-annual basis, and that provide information on activities done and results achieved in a reporting period. This element is assessed in line with the relevant national regulations. In case reporting on the work of state administration bodies is legally part of the Government's work reports, and publishing is done		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is timely 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly

	through the Government's website only, it is eligible for point allocation provided that sample bodies' reports are identifiable within the Government's report. Criteria definition: - Availability, if work report covering the entire scope of responsibility of sample bodies is available - Timely, if reports are published in line with prescribed legal deadlines. - Accessible, if information is not more than three clicks away from the homepage - Citizen friendly, if there is an introductory section that explains the results of work in an understandable language or format, or it contains graphs/illustrations/infographics, or any other elements making those reports communicable.		Maximum score: 4
Element 2.8	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible, and citizen friendly budget information	Practice	Websites of sampled bodies
	Methodology		Point allocation
	Budget information is defined as annual financial (budget) plans, and year-end financial (budget) execution reports, unless specified otherwise. If a sample body provides a clear link to a central online location where its budget information can be found, it is accepted for point allocation. Criteria definition: - Availability, if financial plans for the current year and financial reports for the previous year (or last financial report that should be published in line with regulations) are available on websites - Up to date, if financial plans are in line with the latest in-year budget amendments/modifications, if applicable - Accessible, if financial plans and reports are not more than three clicks away from the homepage (even if website of a sample body redirects to another central location) - Citizen friendly, if sample bodies published a citizen budget for the current calendar year.		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly Maximum score: 4
Element 2.9	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible and citizen friendly contact information	Practice	Websites of sampled bodies
	Methodology		Point allocation
	Contact information is defined as information on emails, phone number, and physical/postal addresses. Criteria definition:		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date

	- Availability, if general contact information is available (generic email, phone number and physical address), as well as contacts for free access to information (emails of responsible persons, telephone of responsible unit) - Up to date, if one general contact information (e.g. cabinet, call centre) and contacts for free access to information are verifiable through phone calls and emails (both contacts need to be verified to be considered up to date) - Accessible, if information on each relevant contact is not more than three clicks away from the homepage - Citizen friendly – if there are dedicated sections on website that present contact information (website user does not have to search through document(s) or use search engine to locate it).		1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>
Element 2.10	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible and citizen friendly information on organisational structure	Practice	Websites of sampled bodies FOI (if not available)
	Methodology		Point allocation
	Information on organisational structure is defined as information on hierarchical breakdown of organisational units and their responsibilities. Criteria definition: - Availability, if the organizational chart/organigram for the entire organisational structure is presented online - Up to date, if presented organisational structure is in line with valid acts on internal organisation (to be requested by FOI if not available) - Accessible, if information is not more than three clicks away from the homepage - Citizen friendly, if organisational chart is presented in a readable manner (names of units can be easily read etc.) and downloadable. FOI requests submitted for the purpose of element are to be included in the sample of all requests used as a data source under sub-indicator 1, where applicable.		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date 1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>
Element 2.11	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish relevant, up to date, easily accessible and citizen-friendly sections dedicated to public consultation processes	Practice	Websites of sampled bodies
	Methodology		Point allocation
	Criteria definition:		1 – 4/5 sample bodies publish information 1 – 4/5 sample bodies publish information that is up to date

	- Availability, if list of public consultation processes organised by sample bodies is available online (or there is a link to a central consultation portal redirecting to consultations processes organised by sample bodies) - Up to date, if public consultation processes from the current and last calendar year are listed (or only for the last calendar year if no consultations took place in the current year) - Accessible, if information is not more than three clicks away from the homepage - Citizen friendly, if all public consultation processes are listed within a dedicated website location. In case of service providers, with no policy making authority, it will be considered if user feedback channels on service provision are available online, accessible and citizen friendly. In this case, up to date would mean that the feedback channel is functional, i.e., that inputs can be submitted by users.		1 – 4/5 sample bodies publish information that is accessible 1 – 4/5 sample bodies publish information that is citizen friendly <i>Maximum score: 4</i>
Element 2.12	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	State administration bodies publish data in open, machine-readable format	Practice	National open data portal Websites of sampled bodies
	Methodology		Point allocation
	Review of national open data portal to determine whether at least single dataset related to the work of sampled bodies is published in machine-readable format. For this element, “machine-readable format means a file format structured so that software applications can easily identify, recognise and extract specific data, including individual statements of fact, and their internal structure”.² File formats include common open data formats with highest openness rating i.e., that are adjustable such as xml, xlsx, xls, ods, csv, tsv, json.³ To qualify for maximum point allocation, any such dataset should be available at the national open data portal. If such portal does not exist, any such document/dataset should be available within a purposefully created online section at sampled bodies’ websites.		2 – all sample bodies publish at least single dataset related to their work in open, machine-readable format through their websites 2 – available open datasets are published on the national open data portal <i>Maximum score: 4</i>
Element 2.13	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	Public administration publishes high-value open datasets	Practice	Relevant government websites
	Methodology		Point allocation

² Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast).

³ See more: https://data.europa.eu/sites/default/files/data_formats_v1.pdf.

	According to the 2019/1024 EU Directive, high-value datasets are “documents the re-use of which is associated with important benefits for society, the environment and the economy, in particular because of their suitability for the creation of value-added services, applications and new, high-quality and decent jobs, and of the number of potential beneficiaries of the value-added services and applications based on those datasets”.⁴ The approach for this element considers whether such high-value datasets are published by the government/state bodies online. According to the Directive these datasets shall be: (a) available free of charge, (b) machine readable, (c) provided via APIs; and (d) provided as a bulk download, where relevant. Thematic categories: 1. Geospatial; 2. Earth observation and environment; 3. Meteorological; 4. Statistics; 5. Companies and company ownership; 6. Mobility.		For each thematic category, 0.75 point is allocated if single dataset is published, that meets all four criteria (a-d): - 6 thematic categories x 0.75= 4.5 <i>Maximum score: 4.5</i>
Element 2.14	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	Key non-state actors consider proactively published information as citizen-friendly	Outcomes and Impact	Key informants’ interviews
	Methodology		Point allocation
	Attitudes of key informants are assessed via the same key informant interviews, and using the same methodological approach, from the Element 1.15. Findings from the interview discussions are used for determining point allocation and for qualitatively supplementing PAR Monitor reports. Interviewees respond to the following statements: To what extent do you agree or disagree with following: 1. Public information that is proactively published online, on websites of public authorities, is citizen friendly.		3 – all interviewees agree that proactively published information on websites of public authorities is citizen friendly <i>Maximum score: 3</i>
Element 2.15	Formulation	Type	Data source
<i>SIGMA Principle P15. i</i>	Citizens’ perception of accessibility of information on public authorities’ websites	Outcomes and Impact	Public perception survey
	Methodology		Point allocation

⁴ Directive (EU) 2019/1024 of the European Parliament and of the Council of 20 June 2019 on open data and the re-use of public sector information (recast).

	The results of the public perception survey are used as a basis for point allocation under this element. Researchers award points under this element based on the percentage of citizens who responded with "agree" and "strongly agree" to the following statement: I can easily find the information I need on the websites of public authorities and the Government.	0.5 – 20%-40% of respondents responded with "agree" or "strongly agree" OR 1 – 40%-60% of respondents responded with "agree" or "strongly agree" OR 1.5 – 60%-80% of respondents responded with "agree" or "strongly agree" OR 2 – more than 80% of respondents responded with "agree" or "strongly agree" <i>Maximum score: 2</i>
SUBTOTAL POINTS		50.25
TOTAL POINTS		100

Annexe 1: Key informant interviews

➤ Element 1.15

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

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

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

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

➤ Element 1.16

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

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

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

1. When it comes to exemptions when responding to FOI requests, are they typically justified clearly and specifically, or in a generic manner?

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

➤ **Element 2.14**

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

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

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

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

Annexe 2: FOI requests

FOI requests are used to gather data necessary for point allocation for element 2.10. Researchers send FOI requests to relevant institutions only if data requested under the methodology for these elements are not publicly available.

➤ **Element 2.10**

A freedom of information request is submitted to each of the sample bodies where the valid act on internal organisation is not publicly available, requesting the following: **currently valid act on internal organisation of the body.**