



**USAID**  
 NGA POPULLI AMERIKAN  
 OD AMERIČKOG NARODA

**KOSOVA  
 DEMOCRATIC  
 INSTITUTE**

**TRANSPARENCY  
 INTERNATIONAL  
 KOSOVA**

# TRANSPARENCY INDEX FOR MUNICIPAL GOVERNANCE 2020

## FOR 38 MUNICIPALITIES OF KOSOVO

APRIL 2021



> >> >>> >>>> **TRANSPARENCY AND ANTI-CORRUPTION** <<<< <<<< <<<<



APRIL 2021

# **TRANSPARENCY INDEX FOR MUNICIPAL GOVERNANCE 2020**

**FOR 38 MUNICIPALITIES  
OF KOSOVO**



COPYRIGHT © 2021. Kosova Democratic Institute (KDI).

Kosova Democratic Institute reserves all rights to this report and no part of this publication shall be subject to reproduction or transmission in any mechanical or electronic form, including photocopying, or any storing or retrieval system of materials without publisher's prior authorization in writing. The publication may be reproduced or transmitted only for non-commercial purposes. Whenever and whoever intends to use excerpts or different materials of this publication shall be obliged to clearly state the source wherever the excerpts or materials used have been obtained.

Should you have any comments, criticism or suggestions, please contact us through any of the following options provided below:

Address: Street Bajram Kelmendi, no. 45,  
10000, Prishtina, Kosovo  
Tel.: +381 (0)38 248 038  
E-mail: [info@kdi-kosova.org](mailto:info@kdi-kosova.org)  
Web: [www.kdi-kosova.org](http://www.kdi-kosova.org)

By: Diana Metushi Krasniqi

Design: Envinion

This publication has been prepared by the Kosovo Democratic Institute - Transparency International Kosova and supported by USAID through the Transparent, Effective and Accountable (USAID TEAM) activity. The author's views expressed in this publication do not necessarily reflect the views of the United States Agency for International Development (USAID) or the Government of the United States of America.

# CONTENT

- LIST OF ABBREVIATIONS..... 8**
- INTRODUCTION ..... 9**
- EXECUTIVE SUMMARY ..... 10**
- RANKING OF MUNICIPALITIES ..... 14**
- RESEARCH METHODOLOGY ..... 16**
- LIST OF INDICATORS ..... 20**
- COMPARATIVE ANALYSIS 2015-2020 ..... 25**
- COMPARATIVE ANALYSIS 2018-2020 ..... 30**
- PILLAR I: TRANSPARENCY IN PUBLIC PROCUREMENT ..... 32**
  - Procurement planning on the web site ..... 34
  - Transparency in tendering activities ..... 35
  - Contract notices..... 35
  - Contract award notices..... 36
  - Publication of signed contracts..... 39
  - Transparency in public auctions ..... 41
  - Information in the first instance complaints relating to public procurement process ..... 43
- PILLAR II: BUDGET TRANSPARENCY ..... 45**
  - Publication of the investment plan on the web site..... 48
  - Publication of the approved budget on the web site..... 49
  - Publication of changes to budget appropriations on the web site ..... 50
  - Publication of the quarterly financial reports on the web sites ..... 50



Publication of the annual summary report for the municipality’s budget  
for the previous fiscal year on the web site..... 51

Publication of the Mid-Term budgetary framework on the web site ..... 52

Audit report on the web site..... 52

Publication of the annual report on subsidies on the web site ..... 53

**PILLAR III: ACCESS TO PUBLIC DOCUMENTS..... 54**

**PILLAR IV: INFORMATION AND PUBLIC PARTICIPATION..... 55**

Openess and public consultation..... 57

    Tender opening sessions ..... 57

    Publication of draft budget for public consultations ..... 57

    Publication of draft decisions and/or agendas for consultation with public ..... 57

    Public Hearings..... 58

Citizens’ visits to Municipal web sites ..... 59

Communication with the Municipality..... 61

Information on municipal enterprises and subordinate institutions ..... 62

**PILLAR V: GRANTS AND FUNDING ..... 63**

**PILLAR VI: PROFESSIONAL ETHICS AND CONFLICT OF INTEREST..... 67**

**CONCLUSIONS ..... 72**

**RECOMMENDATIONS..... 73**





IN TIMES LIKE THESE, TRANSPARENCY  
MATTERS MORE THAN EVER  
The need for transparency and  
accountability during the COVID-19  
pandemic goes beyond health systems.”

TRANSPARENCY INTERNATIONAL, 2020

# LIST OF ABBREVIATIONS

<b>AI</b>	Administrative Instructions
<b>KDI</b>	Kosova Democratic Institute
<b>LPP</b>	Law on Public Procurement
<b>PPI</b>	Public Procurement Index
<b>PPRC</b>	Public Procurement Regulatory Commission
<b>PRB</b>	Procurement Review Body
<b>E-PROCUREMENT</b>	Electronic Public Procurement Platform
<b>MLG</b>	Ministry of Local Government
<b>MPA</b>	Ministry of Public Administration
<b>MLSW</b>	Ministry of Labor and Social Welfare
<b>MF</b>	Ministry of Finance
<b>NAO</b>	National Audit Office
<b>SME</b>	Small and Medium Enterprises
<b>TI</b>	Transparency International
<b>TIK</b>	Transparency International Kosovo

# INTRODUCTION

Year 2020 was not a usual year for any government, process, or citizen. Same as the entire globe, Kosovo was faced with COVID-19 pandemic and its side-effects. The public health threat imposed social distancing restrictions by the central government and health institutions. These restrictions affected operations of both central and local governments, as well as the life and wellbeing of citizens. Being faced with a major risk, citizens have never been more dependent on government actions and information.

Kosovo came to face the pandemics with no financial preparations, action plan or the necessary infrastructure, and the first to be confronted with these challenges were municipalities<sup>1</sup>. This *force majeure* prompted an increase usage of emergent and unplanned expenditures in order to accommodate the public health and social welfare needs. As a result, transparency was overlooked in these expedient procurement procedures in both central and local governance, thus, as some studies note, increasing the risk of public money being spend less carefully<sup>2</sup>.

Year 2020, more than ever, raised the importance of transparency. While life, health, social welfare, education, and economy depended on the government support, as well as the government's confrontation with the reduction of revenues from the collection of taxes, duties and excises, there were continuous reporting of loss of public money through high prices

of emergent acquisitions, favoritism, and lack of accountability which remains an ongoing challenge in public governance in Kosovo<sup>3</sup>.

For the fifth consecutive year, through the publication of the Transparency Index, Kosova Democratic Institute (KDI)/Transparency International Kosova (TIK) continues to shed light on municipal expenditures through public procurement and financing and thereby encouraging institutions to improve the quality of services delivered to citizens. The goal of this Index is to inform citizens about the levels of transparency and efficiency with which local governments can provide goods, works, and services, and to encourage institutions to conduct more efficient and transparent financial planning and expenditures.

1 Government of Kosovo's decision No. 01/09 to place in quarantine Municipalities of Klina and Vitia/Vitina, dated 13 March 2020

2 Kosovo during pandemic COVID-19, Friedrich Naumann Foundation, May 2020; available at <https://www.freiheit.org/western-balkans/kosovo-during-pandemic-covid-19>

3 Kosovo\* 2020 Report, European Commission, Oct. 2020





opened this process up to public consultation. Whereas **31 municipalities** published their draft decisions about municipal investments, including their agendas on their web sites, and 35 municipalities provided means of electronic communication via e-mail addresses or communication boxes in the contact module. On the other hand, according to the data received from the **32 municipalities** that responded to the request for information, during 2020, these municipalities organized **169 public budgetary hearings with 16,718 participants**. One of the key contributors to the increase of public participation was utilization of social media as digital means of communicating with citizens.

However, 2020 showed a **decrease of 3%** in transparency in municipalities promoting professional ethics and mitigating conflicts of interest from 76% in 2019 to 73% in 2020.

Publication of these documents in the municipalities' web sites is the first line of accountability towards

their citizens. Moreover, this is witnessed by the number of visits to these web sites. According to information received from the Ministry of Local Government (MLG), the municipal web sites in 2020 were visited **4,167,112** times, by 1,248,850 visitors.

This is a clear indicator that besides the challenges of being faced with a **force majeure**, municipalities should focus on publishing more and more information to their citizens. While all documents pertaining to public procurement and budget have to be reported to the central government, municipalities should establish structures for the same to be immediately published on their web sites.

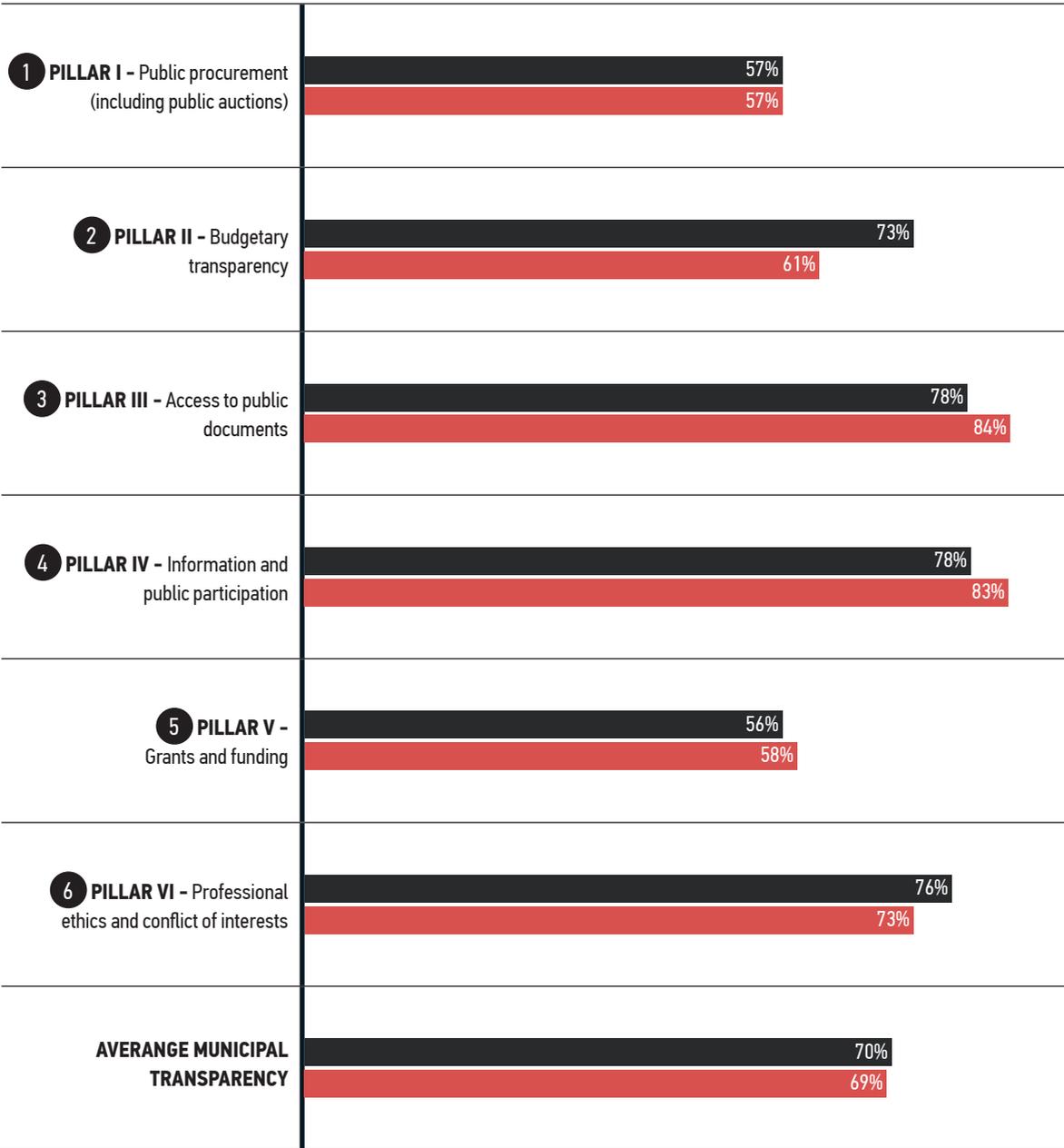
Also, KDI encourages all municipalities to review their gaps in this index for 2020 and focus on increasing the transparency in all pillars in 2021, aside the challenges imposed by the pandemics.



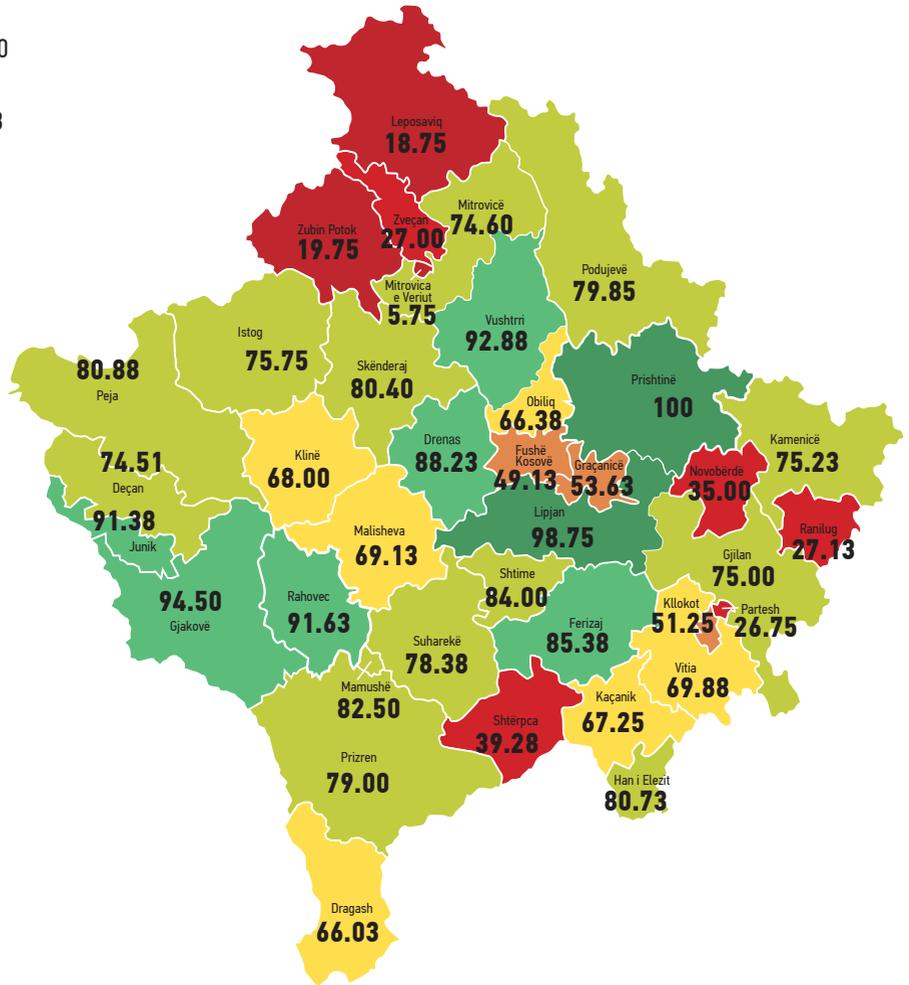
In 2020, being faced with the **COVID-19** pandemic, Kosovo witnessed a change by **-1%** of transparency in local governance when comparing to the previous year (2019).



# OVERALL TRANSPARENCY OF MUNICIPALITIES IN SIX PILLARS



# TOP RANKING OF MUNICIPALITIES



0 LEAST TRANSPARENT MUNICIPALITY

MOST TRANSPARENT MUNICIPALITY

100



|||||

Municipality / Pillar		Pillar I - Public procurement (including public auctions)	Pillar II - Budgetary transparency	Pillar III - Access to public documents	Pillar IV - Information and public participation	Pillar V - Grants and funding	Pillar VI - Professional ethics and conflict of interest	OVERALL SCORE PER MUNICIPALITY
16	Suhareka/Suva Reka	24.00	15.63	10.00	15.00	7.50	6.25	78.38
17	Istog/Istok	27.00	12.50	10.00	15.00	3.75	7.50	75.75
18	Kamenicë/Kamenica	20.85	15.63	10.00	15.00	7.50	6.25	75.23
19	Gjilan/Gnjilane	22.50	12.50	10.00	15.00	7.50	7.50	75.00
20	South Mitrovica	17.10	18.75	10.00	15.00	7.50	6.25	74.60
21	Deçan/Dečan	21.45	20.31	10.00	9.00	5.00	8.75	74.51
22	Viti/Vitina	14.25	15.63	10.00	15.00	6.25	8.75	69.88
23	Malishevë/Mališevo	6.00	21.88	10.00	15.00	7.50	8.75	69.13
24	Klina	21.00	12.50	10.00	12.00	5.00	7.50	68.00
25	Kaçanik/Kaçanik	13.50	12.50	10.00	15.00	7.50	8.75	67.25
26	Obiliq/Obilic	12.00	15.63	10.00	15.00	7.50	6.25	66.38
27	Dragash/Dragaš	11.40	21.88	10.00	9.00	7.50	6.25	66.03
28	Gračanicë/Gračanica	13.50	15.63	0.00	12.00	6.25	6.25	53.63
29	Klllokot/Klokot	15.00	18.75	0.00	7.50	6.25	3.75	51.25
30	Fushë Kosovë/Kosovo Polje	3.00	15.63	10.00	10.50	3.75	6.25	49.13
31	Shtërpçë/Štrpce	4.65	9.38	10.00	9.00	1.25	5.00	39.28
32	Novobërdë/Novo Brdo	6.75	6.25	0.00	12.00	3.75	6.25	35.00
33	Ranilug	3.00	9.38	0.00	6.00	3.75	5.00	27.13
34	Zveçan/Zvečan	6.00	0.00	10.00	6.00	0.00	5.00	27.00
35	Partesh/Partes	3.00	0.00	0.00	15.00	5.00	3.75	26.75
36	Zubin Potok	3.00	0.00	10.00	3.00	0.00	3.75	19.75
37	Leposaviq/Leposavić	6.00	0.00	10.00	1.50	0.00	1.25	18.75
38	North Mitrovica	3.00	0.00	0.00	1.50	0.00	1.25	5.75

0

LEAST TRANSPARENT MUNICIPALITY

MOST TRANSPARENT MUNICIPALITY

100

|||||



# RESEARCH METHODOLOGY

Kosova Democratic Institute (KDI), the chapter of Transparency International (TI) for Kosovo, has relied upon Transparency International's standard methodology over the past years to measure transparency of institutions in public procurement. In 2018, KDI upgraded the methodology to accommodate new legal provisions in public procurement in Kosovo.

This upgraded rating methodology was adopted in Kosovo through a participatory process involving technical experts and local government stakeholders<sup>4</sup>. This participatory process was informative for municipalities and led to greater levels of municipal ownership of the evaluation process. The recommendation of the focus group was to cluster indicators of the same nature into pillars, therefore combining public procurement and auctions into one single pillar, as defined below. At the recommendation of the focus group, two new pillars were added addressing (1) grants and financing and (2) professional ethics and conflicts of interest. Also, a new indicator was added to the pillar on Information and Public participation pertaining to public enterprises and subsidiary institutions.

For the Transparency Index in Municipal Governance 2020, KDI assessed the institutional transparency of Kosovo's municipalities against **41 indicators**, clustered in **six thematic pillars**. In 2019, two indicators

were removed from the methodology used in 2018. One indicator is related to central platform for public procurements, as this is a mandatory requirement for all contracting authorities, and the second indicator was pertaining the publication of the legislation that regulates public enterprises, as this is only applicable to larger municipalities. The methodology used in 2020 is a mere reflection of the methodology used in 2019.

Since the number of indicators and points per indicator do not provide a maximum combined score of 100, weighted scoring was used for numerical scores allowing KDI to rank performance based on categories of differing levels of prioritization or importance. The number of indicators, maximum points for indicators per pillar, and the weight of each pillar is shown in the table below.

---

<sup>4</sup> Focus Group held on 15.03.2018 with representatives from Government, Donor Agency and Civil Society



|||||

<b>Pillar</b>	<b>Number of indicators</b>	<b>Total indicator points</b>	<b>Maximum weighted points by pillar</b>
<b>PILLAR I</b> - Public procurement (including public auctions):	14	20	30
<b>PILLAR II</b> - Budgetary transparency:	8	16	25
<b>PILLAR III</b> - Access to public documents:	4	4	10
<b>PILLAR IV</b> - Information and public participation:	7	10	15
<b>PILLAR V</b> - Grants and funding:	4	8	10
<b>PILLAR VI</b> - Professional ethics and conflict of interest:	4	8	10
<b>TOTAL</b>	<b>41</b>	<b>66</b>	<b>100</b>

\*\*\* All 38 municipalities have been informed through email about new methodology, indicators, and scoring<sup>5</sup>.

<sup>5</sup> E-mail sent to all Mayors on 26 May 2020

|||||



**The indicators are divided into:**

**1. Output Indicators** – there are 29 output indicators that measure whether planned activities and actions are being implemented as intended or as required by law. These indicators rely on data drawn from robust, verifiable sources such as municipal or central government web sites. These indicators score from 0 to 2 points, as listed below:

- 0 Points** - indicating that there was no information
- 1 Point** – indicating that the information was partially disclosed
- 2 Points** – indicating that the information was fully disclosed

**2. Performance Indicator** – there are 12 performance indicators which measure the quality of performance. KDI enumerators relied on these indicators to compare data and establish a performance percentage. To match the numerical points of other indicators, these indicators were evaluated as outlined in the table below:

DATA COMPARISON MUNICIPALITY VS ALTERNATE SOURCE IN PERCENTAGE	1 – 9	10-19	20 – 29	30 – 39	40 – 49	50 – 59	60 – 69	70 – 79	80 – 89	90 – 99	100
<b>POINTS</b>	0.1	0.2	0.3	0.4	0.5	0.6	0.7	0.8	0.9	1	2



|||||

### Method of assessment used to award a certain number of points:

- A** Analytical conclusion of the research team;
- D** Ensuring standards of compliance adopted by the MLGA AI 01/2015<sup>6</sup>, MPA AI 01/2015<sup>7</sup>, LAW No.04/L-042<sup>8</sup>, LAW No. 03/L-040<sup>9</sup>, LAW No. 03/L-048<sup>10</sup>, MLSW Rules No.02/2015<sup>11</sup>, and Government Decision No. 07/87<sup>12</sup>; Government of Republic of Kosovo Regulation No. 04/2015<sup>13</sup>.
- W** Website analysis. The research clearly indicates there is sufficient information on the official Website or other official Internet resources;
- I** Response to letter of inquiry;
- T** Internet data;
- S** complaints of citizens, court decisions, articles in the reputable mass media, public documents from NGOs (Non-Governmental Organizations), and deputies of the City Council.
- M** Direct meeting and interviews with local government and citizens

---

<sup>6</sup> Administrative Instruction (MLGA) no. 01/2015 for the transparency in municipalities: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=11403>

<sup>7</sup> Administrative Instruction (MPA) no. 01/2015 on the web sites of public: [https://map.rks-gov.net/getattachment/04a69d9b-2b96-4ef2-bfc7-4c82cb860384/Udhezimi-Administrativ-\(MAP\)-nr-01-2015-per-Ueb-Fa.aspx](https://map.rks-gov.net/getattachment/04a69d9b-2b96-4ef2-bfc7-4c82cb860384/Udhezimi-Administrativ-(MAP)-nr-01-2015-per-Ueb-Fa.aspx)

<sup>8</sup> Law No. 04/L-042 on public procurement in Republic of Kosovo: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2772>

<sup>9</sup> Law No. 03/L-040. on local self-government: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2530>

<sup>10</sup> Law no. 03/L-048 on public financial management and accountability: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2524>

<sup>11</sup> Rules (MLSW) No.02/2015 on the criteria and procedures for financial support for subsidies and grants: <https://gzk.rks-gov.net/ActDetail.aspx?ActID=11129>

<sup>12</sup> Government Decision 07/87 on Open Data: [http://www.kryeministri-ks.net/repository/docs/Vendimet\\_e\\_Mbledhjes\\_se\\_87-te\\_te\\_Qeverise\\_2016.pdf](http://www.kryeministri-ks.net/repository/docs/Vendimet_e_Mbledhjes_se_87-te_te_Qeverise_2016.pdf)

<sup>13</sup> Regulation (GRK) - No. 04/2015 on civil servant code of conduct of the republic of Kosovo: [http://kryeministri-ks.net/repository/docs/Rregullore\\_QRK\\_Nr.042015\\_per\\_Kodin\\_e\\_Miresjelljes\\_ne\\_Sherbimin\\_Civil\\_te\\_Republikes\\_se\\_Kosoves\\_19.pdf](http://kryeministri-ks.net/repository/docs/Rregullore_QRK_Nr.042015_per_Kodin_e_Miresjelljes_ne_Sherbimin_Civil_te_Republikes_se_Kosoves_19.pdf)

|||||

# LIST OF INDICATORS

Pillar	Indicator	Legal requirement	Output	Type of indicator	Indicator assessment
 <p><b>PILLAR I</b></p> <p>Public procurement (including public auctions)</p>	1 Is the procurement plan published on the web site	MPA AI 01/2015	Y/N	Output Indicator	D, W
	2 Is there a list of all executive bodies, public institutions and organizations who regulate or address procurement advices and disputes	MPA AI 01/2015	Y/N	Output Indicator	D, W
	3 Is there annual procurement report for the previous year published on the web site	MPA AI 01/2015	Y/N	Output Indicator	D, W
	4 Notifications for tenders are published on the municipality's web site	Article 12 of MLGA AI 01/2015	Y/N	Output Indicator	D, W
	5 Notifications for contract awards are published on the municipality's web site	Article 12 of MLGA AI 01/2015	Y/N	Output Indicator	D, W
	6 Number of notifications for tenders on the municipality's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	7 Number of notifications for tenders on the PPRC's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	8 Number of notifications for contract award on the municipality's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	9 Number of notifications for contract award on the PPRC's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W

|||||

Pillar	Indicator	Legal requirement	Output	Type of indicator	Indicator assessment
 Public procurement (including public auctions)	Does the municipality publish contracts on its web site	These indicators are illustrative, to show if the contracts are published by the municipality, and how many, however, they are not scored.	Y/N	Output Indicator	W
	Number of contracts published on the municipality's web site	These indicators are illustrative, to show if the contracts are published by the municipality, and how many, however, they are not scored.	Data	Quantitative Indicator	W
	Does the municipality publish PRB decisions on its web site	Recommendation given by KDI after the 2020	Y/N	Output Indicator	W
	Number of PRB decisions published on the municipality's web site	Recommendation given by KDI after the 2020	Data	Quantitative Indicator	W
	<b>10</b> Number of notifications for auctions on the municipality's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	<b>11</b> Number of notifications for auctions on the PPRC's web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	<b>12</b> Are first degree claims and Decisions for procurement process published on municipality's web site	Article 12 of MLGA AI 01/2015	Y/N	Output Indicator	D, W
	<b>13</b> Number of decisions/ answers on 1st degree claims for procurement process published in web site	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W
	<b>14</b> Number of decisions/ answers on 1st degree claims for procurement process, information from municipality	Article 12 of MLGA AI 01/2015	Qualitative data	Performance Indicator	A, D, W

|||||



Pillar	Indicator	Legal requirement	Output	Type of indicator	Indicator assessment
 Budgetary transparency	1 Is the investing plan published on the web site	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	2 Is the budget published on the website	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	3 Are the amendments to the budget published on the web site	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	4 Are the quarterly expense reports published on the web site	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	5 Is the summary report for the municipality's budget for the previous fiscal year published on the web site	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	6 Are mid-term budgetary framework published on the web site	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	7 Is the audit report on webpage	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	8 Is the annual report on subventions published on the web site	Good governance	Y/N	Output Indicator	D, W
 Access to public documents	1 Number of requests for access to public documents	MLGA AI 01/2015 (Article 9)	Qualitative data	Performance Indicator	I
	2 Number of rejected requests and administrative silence (non-responses)	MLGA AI 01/2015 (Article 9)	Qualitative data	Performance Indicator	I
	3 Number of requests relating to public procurement	MLGA AI 01/2015 (Article 9)	Qualitative data	Performance Indicator	I
	4 Number of rejected requests relating to public procurement	MLGA AI 01/2015 (Article 9)	Qualitative data	Performance Indicator	I



|||||

Pillar	Indicator	Legal requirement	Output	Type of indicator	Indicator assessment
 Information and public participation	1 Are tender opening sessions opened to public	LPP 04/L-042	Y/N	Output Indicator	D, I
	2 How often do the citizens use the municipality web site	Good governance	Number	Quantitative Indicator	T
	3 Is the draft budget published for public consultations	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	4 Are draft decisions and/or agendas published for consultation with public	MLGA AI 01/2015	Y/N	Output Indicator	D, W
	5 Can you send an online letter of enquiry to the municipality	MPA AI 01/2015	Y/N	Output Indicator	D, W
	6 Number of public hearings (min. 2 per year)	MLGA AI 01/2015	Data	Quantitative Indicator	I, W
	7 Is the organizational scheme for including public enterprises and the subordinate institutions published on the web site	MPA AI 01/2015	Y/N	Output Indicator	D, W
 Grants and funding	1 Are the regulations for grant awards published on web site	Law No. 03/L-040, Law No. 03/L-048 MPA AI 01/2015)	Y/N	Output Indicator	D, W
	2 Are calls for grant applications published on the web site	MLSW Regulation No.02/2015	Y/N	Output Indicator	D, W
	3 Are the results of grant awards published on the web site	MLSW Regulation No.02/2015	Y/N	Output Indicator	D, W
	4 Is there information about the evaluation process of the projects	MLSW Regulation No.02/2015	Y/N	Output Indicator	D, W

|||||



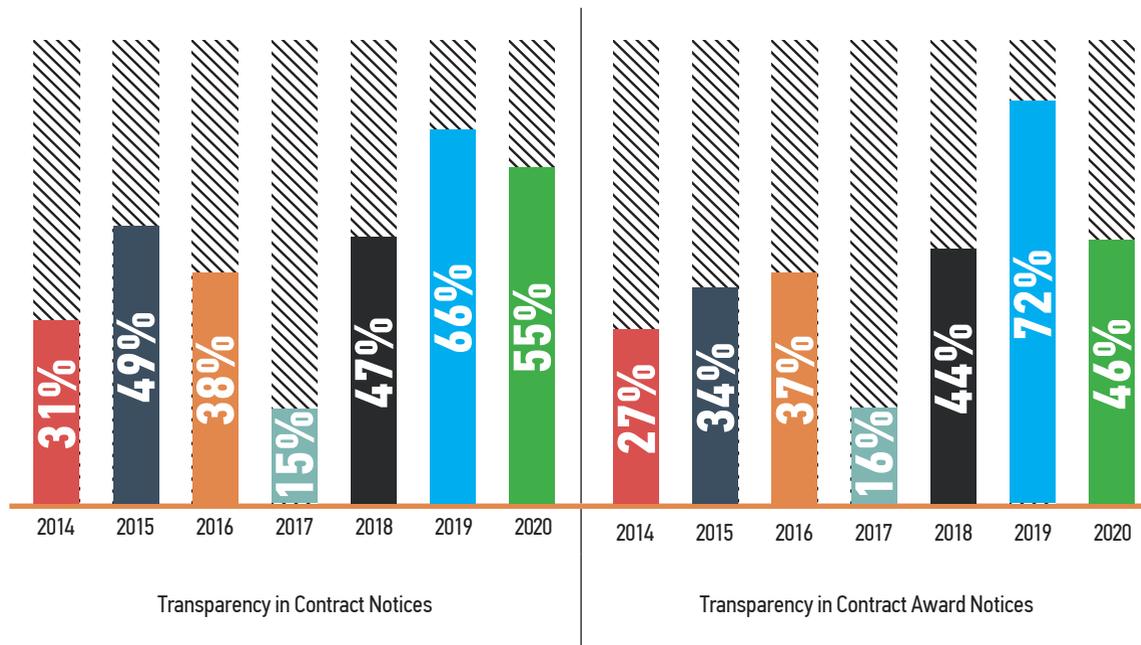
Pillar	Indicator	Legal requirement	Output	Type of indicator	Indicator assessment
 Professional ethics and conflict of interest	<b>1</b> Does the municipality have a Code of Ethics?	Law 03/L-040	Y/N	Output Indicator	I, D
	<b>2</b> Is the Integrity Plan published on the web site	Law 03/L-040	Y/N	Output Indicator	D, W
	<b>3</b> Is there an instrument for reporting unethical behaviors, discrimination or conflict of interest	REGULATION (GRK) - NO. 04/2015	Y/N	Output Indicator	I, D
	<b>4</b> Are political affiliations or political party memberships for the assembly members published in website	MPA AI 01/2015	Y/N	Output Indicator	D, W





The graph below shows the transparency trends in public procurement through the years 2015- 2020.

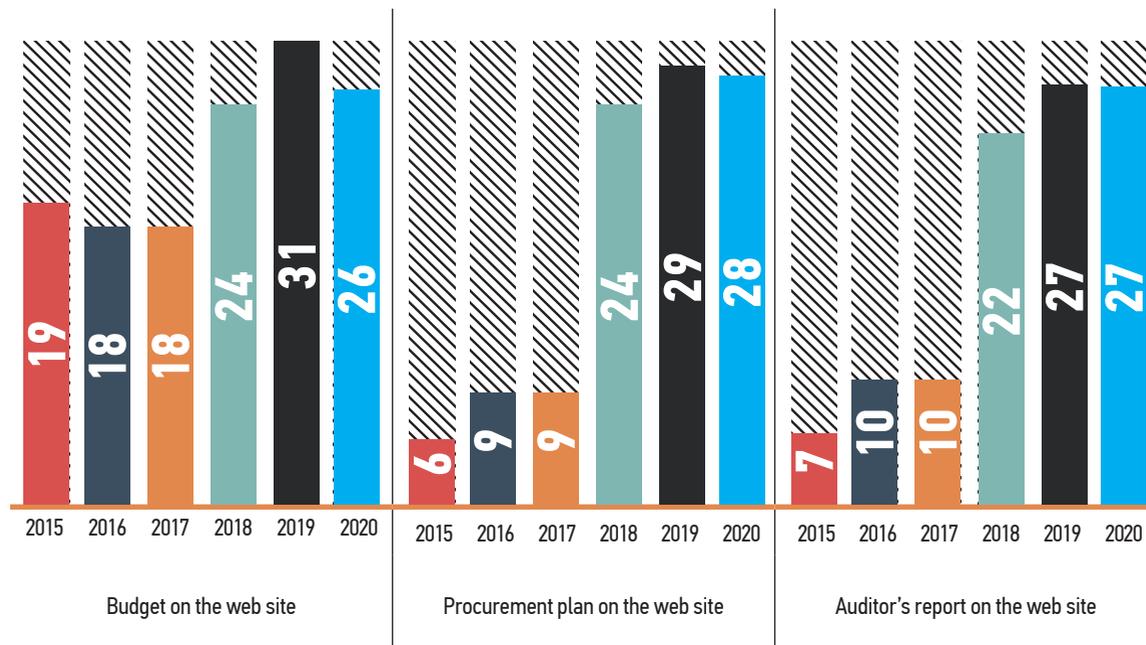
**Transparency in Procurement 2015-2020**





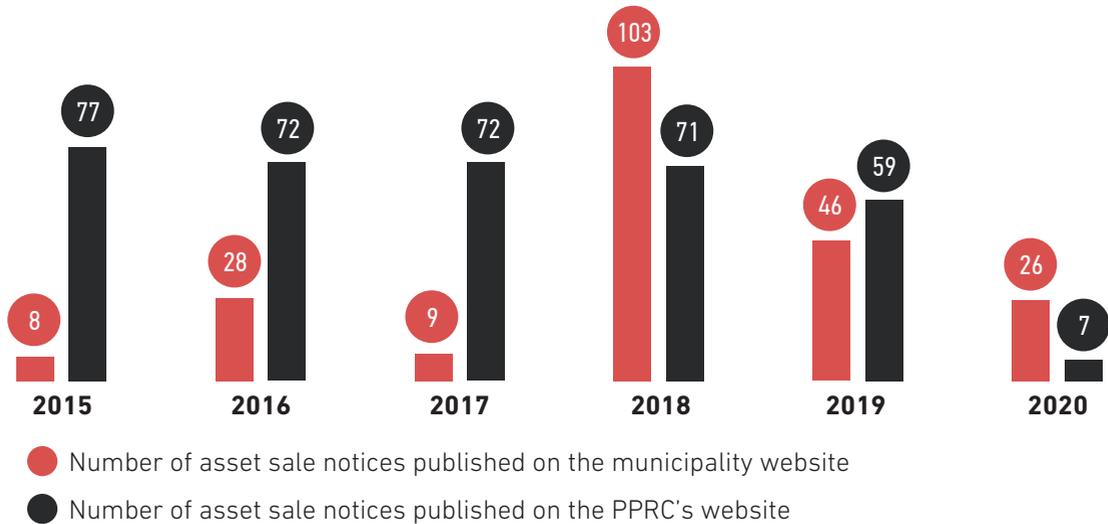
Additionally, municipalities also exhibited a change by **-11%** in budget transparency in comparison to 2019 (from 82% in 2019 to 71% in 2020).

### Budgetary Transparency 2015-2020

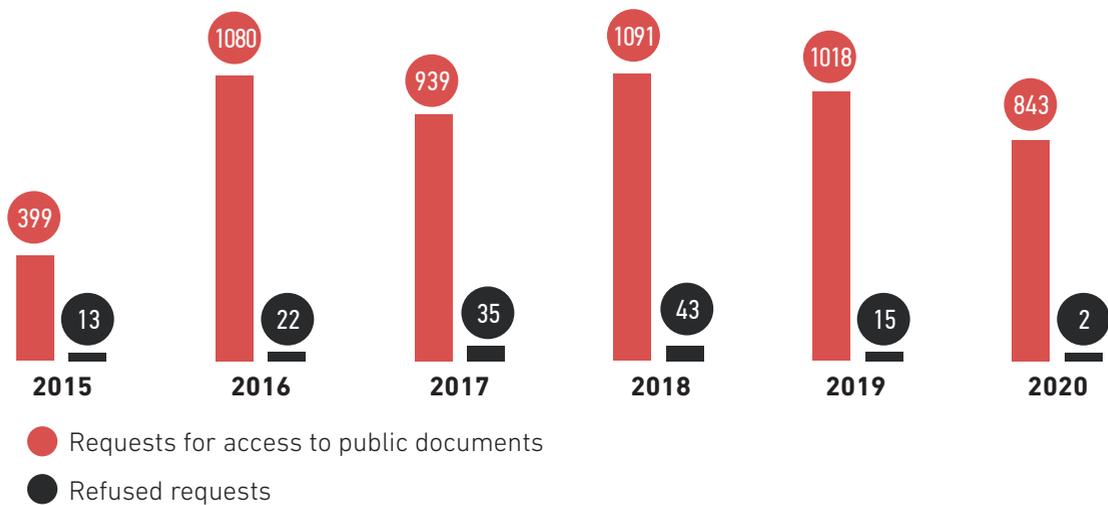


The following chart shows the transparency trends 2015 – 2020 in publication of the asset sales notices by municipalities.

**Publication of public auctions in municipality's web site 2015-2020**

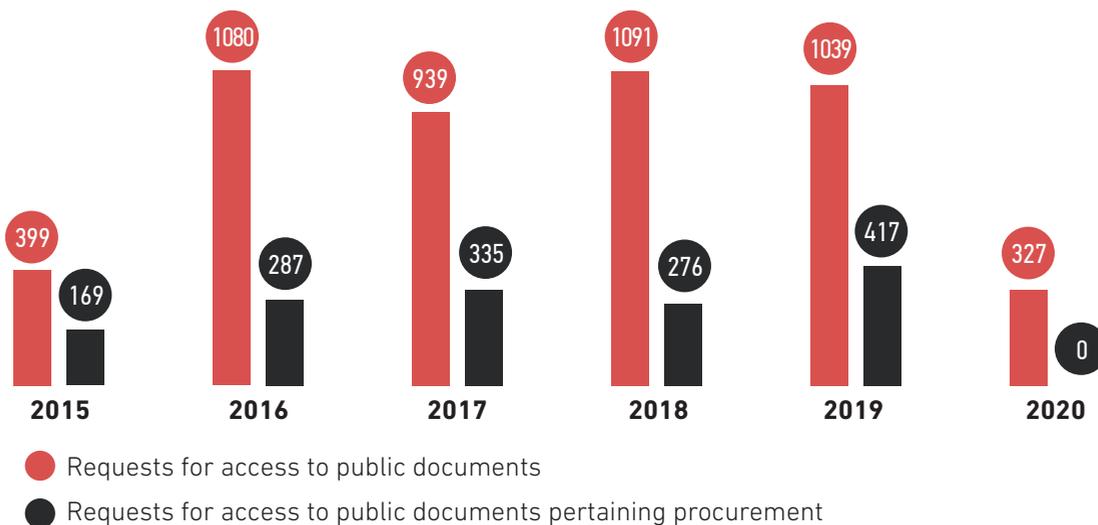


**Access to public documents**



|||||

### Requests to access to public documents pertaining to procurement



As we can see from the above charts, in 2020, there was a change by **-22%** of transparency in the above mentioned **19** indicators.

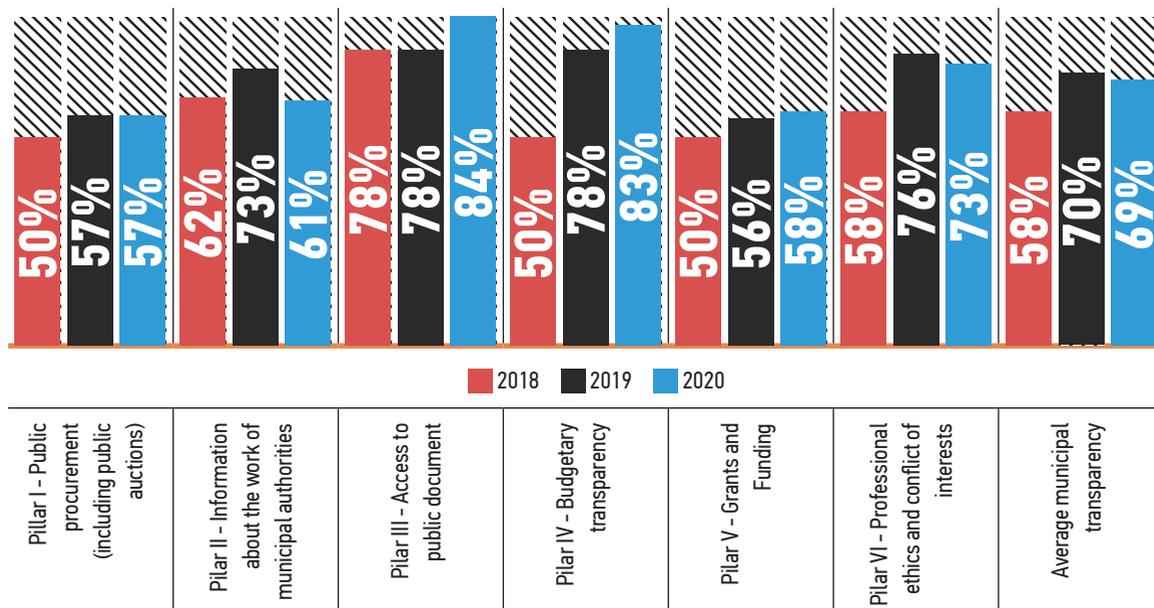
- 1 In 2020, there was a change by **-16%** in transparency in public procurement in comparison to 2019 (from 66% to 51%).
- 2 Additionally, there was a **change** in budgetary transparency by **-11%**, from 82% in 2019 to 71% in 2020.
- 3 On publication of notices for 2020, 26 notices were published in municipalities' websites but only 7 in PPRC's website as required by the legal framework.
- 4 In comparison to 2019, the number of requests to access documents pertaining to public procurement in 2020 **decreased** by a total of **175 requests**.

|||||

# COMPARATIVE ANALYSIS ON TRANSPARENCY FOR LOCAL GOVERNANCE 2018-2020

The methodology used in 2020 is a mere reflection of methodology used in 2018 and 2019. This provided grounds for comparison of municipal transparency performance on the same pillars over the period 2018-2020.

The index shows that in 2020 we had a positive change of transparency in three out of six pillars, and a negative change of transparency in two pillars and one remained the same as follows:



The average municipal transparency in six measured pillars changed by **-1%** from 70% in 2019 to 69% in 2020.

# PILLAR I

## Transparency in Public Procurement

The Transparency Index measures, in Pillar 1, transparency in Public Procurement. In 2020, 33% of Kosovo's public budget was spent through public procurement<sup>14</sup>. But, this process in Kosovo is often described as prone to corruption<sup>15</sup>.

To evaluate the level of transparency in this Pillar, KDI measured 14 indicators<sup>16</sup> related directly to public procurement activities in all 38 municipalities in Kosovo.

The maximum points in this pillar are 30 while the minimum score is zero. The table to the right shows the ranking of municipalities by the individual scoring in this pillar.

The **average score** for all municipalities is **57%**, which remains at the same level as 2019. While all municipalities utilize the electronic procurement platform e-prokurimi, there are several important documents such as feasibility study reports (where applicable), bid evaluation reports, contract management plans, and invoices that are not published on the central platform or local web sites.

However, the rate of publication of procurement plans, annual procurement reports for the previous year, notifications for tenders, notifications for contract award, and notifications for auctions is measurably improving, although there is still room for increased compliance.

Nevertheless, to achieve maximum scores in this pillar, municipalities must demonstrate an extra effort to ensure all contract notices and contract award notices are published on their web sites, not just on the national e-Procurement platform, followed by the publication of first-degree claims and decisions for procurement reviews.

<sup>14</sup> PPRC Annual Report on Public Procurement for 2019

<sup>15</sup> Public Procurement in Western Balkans, European Court of Auditors, 2018

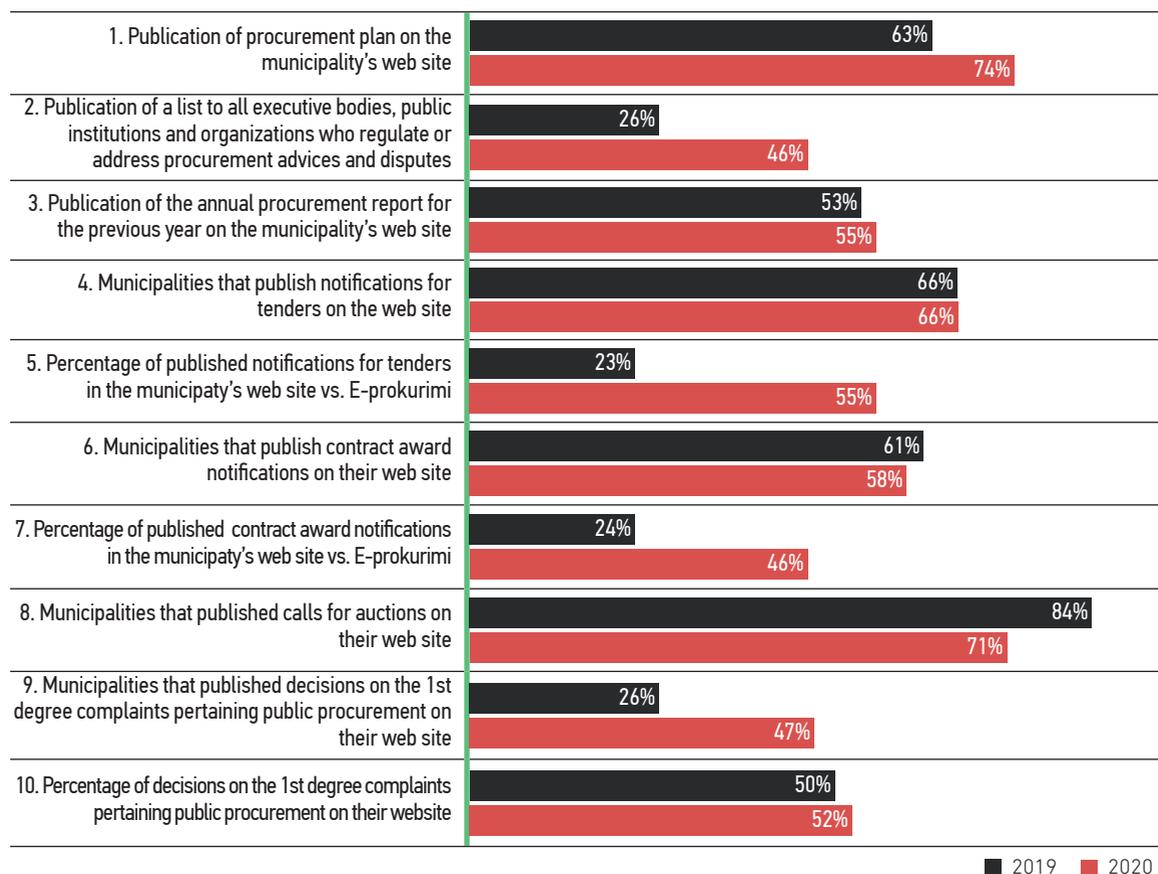
<sup>16</sup> See section on Methodology

Rank	Municipality	Points
1	Lipjan/Ljpljan	30.00
1	Pristina	30.00
3	Mamushë/Mamuša	28.50
3	Rahovec/Orahovac	28.50
3	Vushtrri/Vučitrn	28.50
6	Gjakova/Đakovica	27.00
6	Istog/Istok	27.00
6	Junik	27.00
6	Pejë/Peć	24.00
6	Shtime/Štimlje	24.00
6	Suharekë/Suva Reka	24.00
12	Gllugoc/Glogovac	23.85
13	Gjilan/Gnjilane	22.50
14	Podujevë/Podujevo	22.35
15	Deçan/Dečan	21.45
16	Ferizaj/ Uroševac	21.00
16	Klinë/Klina	21.00
18	Kamenicë/Kamenica	20.85
19	Skenderaj/Srbica	20.40
20	Prizren	20.25
21	South Mitrovica	17.10
22	Hani i Elezit/Elez han	16.35
23	Kllkot/Klokot	15.00
24	Viti/Vitina	14.25
25	Gračanicë/ Gračanica	13.50
25	Kaçanik/Kaçanik	13.50
27	Obiliq/Obilić	12.00
28	Dragash/Dragaš	11.40
29	Novo Bërdë/Novo Brdo	6.75
30	Leposaviq/Leposavić	6.00
30	Malishevë/Mališevo	6.00
30	Zveçan/Zvečan	6.00
33	Shtërpçë/Štrpce	4.65
34	Fushë Kosovë/Kosovo Polje	3.00
34	North Mitrovica	3.00
34	Partesh/Partes	3.00
37	Ranillug/Ranilug	3.00
37	Zubin Potok	3.00

|||||

The following chart presents the current overall situation for all municipalities in this process, by activity, and also comparison to transparency trends between 2019 and 2020:

### TRANSPARENCY IN PUBLIC PROCUREMENT PER INDICATOR (%) 2019 - 2020



- 28 of 38 municipalities published their procurement plans on their web sites;
- 18 of 38 municipalities published a list of all executive bodies, public institutions and organizations who regulate or address procurement advices and disputes on their web sites;
- 21 of 38 municipalities published the annual procurement report from the previous year on their web sites;
- 22 of 38 municipalities published all contract notices, and 6 have partially published their contract notices on their web sites;
- 16 of 38 municipalities published contract award notices, and 12 have partially published their contract award notices on their web sites;
- 11 of 38 municipalities published notices for sale of assets on their web sites;
- 18 of 38 municipalities published the contracting authority's decisions regarding first instance complaints from economic operators on their web sites.

|||||





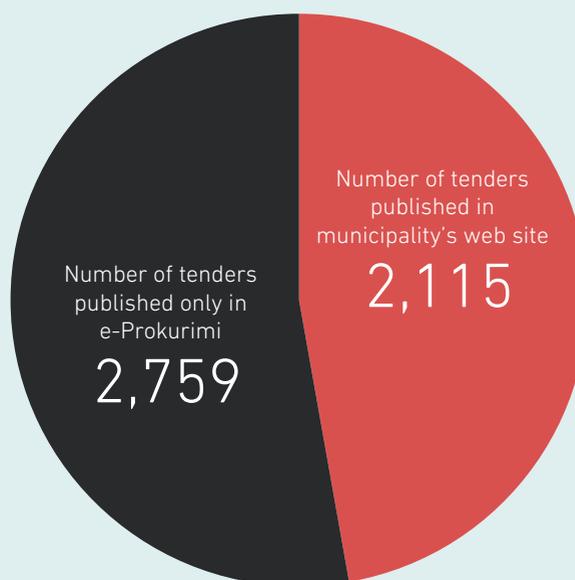
## Transparency in tendering activities

To evaluate the level of transparency in tendering, KDI compared the following six performance indicators, with the aim of illustrating the difference between the websites of municipalities and the notices these institutions have published on the PPRC website:

- 1 Number of notifications for tenders on the municipality's web site;
- 2 Number of notifications for tenders on the PPRC's web site (e-Procurement);
- 3 Number of notifications for contract award on the municipality's web site;
- 4 Number of notifications for contract award on the PPRC's web site (e-Procurement);
- 5 Number of notifications for auctions on the municipality's web site;
- 6 Number of notifications for auctions on the PPRC's web site (e-Procurement).

## Contract notices

The number of tenders published on the municipal web sites is usually different from the number of tenders published on the official central procurement platform (e-Procurement). In 2020, 77% of notices for local government tenders were published on municipal web sites, which marks a change of +9% in transparency compared to the previous year (68%). Out of 2,759 tender notices that were published on the e-Procurement platform, 2,115 of them were also published on municipal web sites.



# Contract award notices

Regarding contract award notices, out of 2,940 notices published on the e-procurement platform, 2,117 of them were also published on municipal web sites. This represents 72% of the contract award notices. In comparison to the previous year (69% in 2019), 2020 marked a change by +3% in transparency in this indicator.



2020 marked a

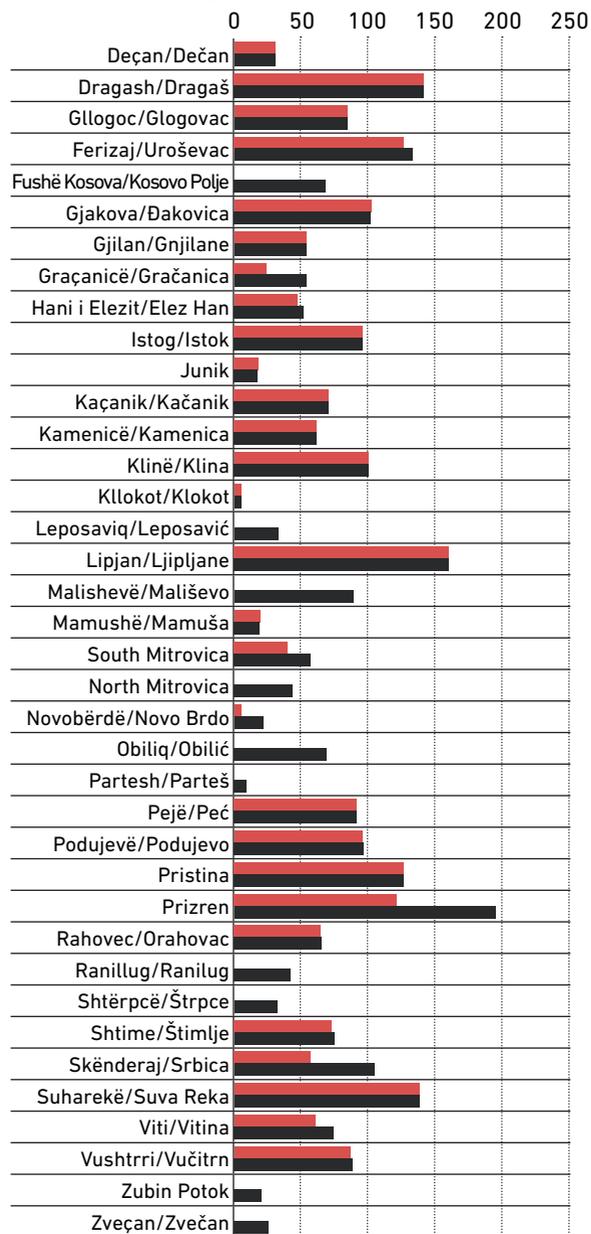
# 3%

increase of transparency in publication of contract award notices.



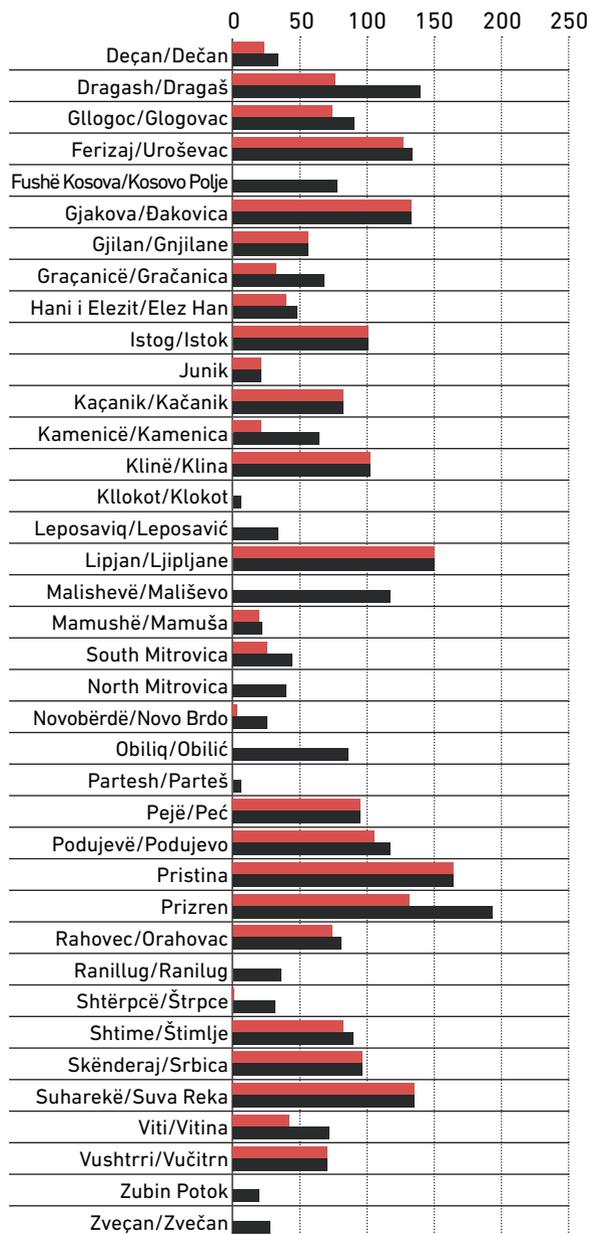
The following tables illustrate the level of procurement transparency for all municipalities of Kosovo:

### Comparison of published tenders between PPRC and municipalities' websites



■ Number of tenders published in Municipality's website  
 ■ Number of tenders published on e-Procurement

### Comparison of the publication of contract award notices



■ Number of contract notices published in Municipalities website  
 ■ Number of contract notices published on e-Procurement



## Publication of contracts and PRB decisions

In 2018, several municipalities started publishing their contracts in their web sites. This number of municipalities started growing over the next two years 2019 and 2020. Additionally, in 2020 KDI recommended all municipalities to start publishing the PRB decisions pertaining their procurement actions. Publication of contracts and PRB decisions on the municipalities' web sites are not a legal requirement, however this practice is recognized as a good governance by municipalities. Although the Index illustrates the municipalities that have shown this good practice and the numbers of published contracts and PRB decisions, these practices are not scored in the index.

Although according to the actual legislation<sup>17</sup>, all contracting authorities shall publish their contracts on the central procurement platform e-procurement, most municipalities continued to follow the trend of publishing their contracts on their municipalities' web sites. Through 2020, 25 municipalities published contracts on their web sites, as listed below (in alphabetical order):

#	Municipality	# of published contracts	#	Municipality	# of published contracts
1	Dečan/Dečan	42	14	South Mitrovica	19
2	Dragash/Dragaš	120	15	Obiliq/Obilić	74
3	Glllogoc/Glogovac	141	16	Peja/Peć	103
4	Ferizaj/Uroševac	166	17	Podujevë/Podujevo	111
5	Gjakova/Đakovica	128	18	Pristina	219
6	Gjilan/Gnjilane	59	19	Prizren	193
7	Hani i Elezit/Elez Han	48	20	Rahovec/Orahovac	96
8	Istog/Istok	147	21	Shtime/Štimlje	77
9	Junik	24	22	Skënderaj/Srbica	90
10	Kaçanik/Kaçanik	16	23	Suhareka/Suva Reka	200
11	Lipjan/Ljiplane	146	24	Viti/Vitina	56
12	Malishevë/Mališevo	39	25	Vushtrri/Vučitrn	105
13	Mamushë/Mamuša	29			

<sup>17</sup> Rules and Operational Guidelines for Public Procurement



The following twelve municipalities have published the PRB decisions pertaining their procurement actions on their web sites:

- |                    |                   |                     |
|--------------------|-------------------|---------------------|
| 1 Deçan/Dečan      | 5 Istog/Istok     | 9 Pristina          |
| 2 Ferizaj/Uroševac | 6 Junik           | 10 Prizren          |
| 3 Gjakova/Đakovica | 7 Lipjan/Lipljane | 11 Rahovec/Orahovac |
| 4 Gjilan/Gnjilane  | 8 Peja/Peć        | 12 Vushtrri/Vučitrn |



Publication of contracts and PRB decisions on the municipalities' web sites are not a legal requirement, however this practice is recognized as a good governance by municipalities.



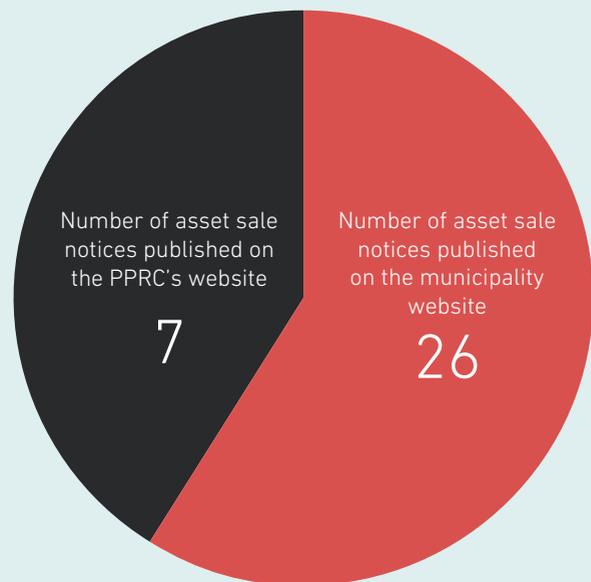
# Transparency in public auctions

In Kosovo, the number of public auctions is quite small compared to the overall number of public procurements. Items sold through auctions are not of high monetary value; however, publication of these activities on the municipalities' web sites is a legal requirement of Law No. 04/L-144 on Allocation for Use and Exchange of Im-movable Property in the Municipality.

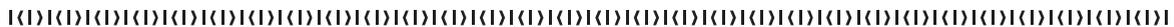
Additionally, the procedures for the public auction notifications and award are regulated through the secondary legislation for public procurement, and therefore, their publication on the PPRC website is also required.

To measure the level of transparency in this process, the Index compared the following two indicators:

1. Number of notifications for auc-tions on the municipality's web site from January to December 2020;
2. Number of notifications for auc-tions on the PPRC and e-Procure-ment web sites from January to December 2020.



The procedures for the public auction notifications and award are regulated through the secondary legislation for public procurement, and therefore, their publication on the PPRC website is also required.



The following is the list of municipalities that have published their calls for auctions on their web sites:

- |                    |                     |                       |
|--------------------|---------------------|-----------------------|
| 1 Dragash/Dragaš   | 5 Kačanik/Kačanik   | 9 Novobërdë/Novo Brdo |
| 2 Glogoc/Glogovac  | 6 Kamenicë/Kamenica | 10 Podujeva/Podujevo  |
| 3 Ferizaj/Uroševac | 7 Klinë/Klina       | 11 Suhareka/Suva Reka |
| 4 Gjakova/Đakovica | 8 Lipjan/Ljiplane   |                       |





## Information in the first instance complaints relating to public procurement process

This Indicator deals with the procurement review (or bid protest) process. KDI measured the transparency of first instance complaints – that is, complaints addressed by the municipalities themselves before escalating to the Procurement Review Body (PRB). The Public Procurement Law was amended by Law No. 05/L-068 that entered into force in January 2016, mandating contracting authorities, themselves, including municipalities, serve as the first instance of review for procurement complaints.

According to information provided by municipalities, in 2020, based on the 32 responses from the municipalities, economic operators filed 549<sup>18</sup> first instance complaints related to procurement activities. The following is the list of municipalities that publish these complaints/decisions on their web site:

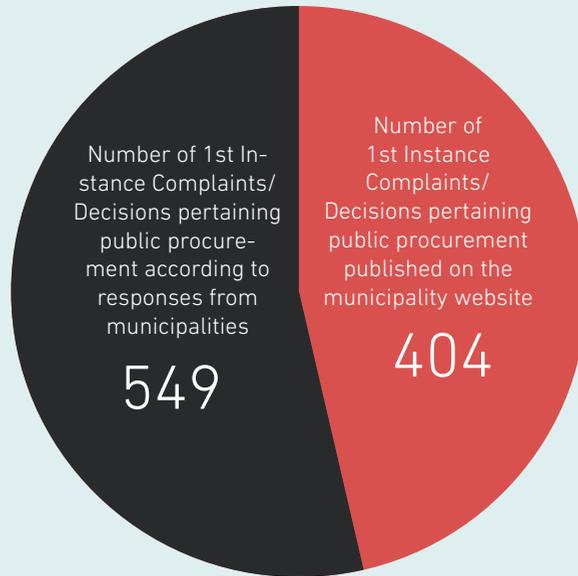
- |                    |                      |                       |
|--------------------|----------------------|-----------------------|
| 1 Deçan/Dečan      | 7 Kamenicë/Kamenica  | 13 Pristina           |
| 2 Gjakova/Đakovica | 8 Klina              | 14 Prizren            |
| 3 Gjilan/Gnjilane  | 9 Lipjan/Ljiplane    | 15 Rahovec/Orahovac   |
| 4 Glogoc/Glogovac  | 10 Mamushë/Mamuša    | 16 Shtime/Štimlje     |
| 5 Istog/Istok      | 11 Peja/Peć          | 17 Suhareka/Suva Reka |
| 6 Junik            | 12 Podujeva/Podujevo | 18 Vushtrri/Vučitrn   |

---

<sup>18</sup> Information received from the municipalities as a response to the inquiry on public information



These municipalities published 404 decisions on these complaints on their web site.



While the majority of the municipalities publish documents pertaining to public procurement, there are four municipalities that do not publish any documentation pertaining to this process. The information about their activities is only available on the central government procurement platform.

- 1 Zvečan/Zvečan
- 2 Leposaviq/Leposavić
- 3 North Mitrovica
- 4 Zubin Potok

# PILLAR II:

## Budget transparency

To measure budget transparency, KDI used the following indicators:

1. Is the municipal investment plan published on the web site?
2. Is the municipal budget published on the website?
3. Are changes to budget appropriations published on the web site?
4. Are the quarterly expense reports published on the web site?
5. Is the Annual Summary Report for the municipality's budget for the previous fiscal year published on the web site?
6. Are mid-term budgetary framework documents published on the web site?
7. Is the external audit report posted on the web page?
8. Is the annual report on subsidies published on the web site?

The maximum points in this section are 25 while the minimum score is zero. The table to the right shows the ranking of municipalities by the individual scoring in this pillar. The average score for budgetary transparency is **61%**.

In comparison to previous year (2019), there was a change in budget transparency by -12%, from 73% in 2019 to 61% in 2020.

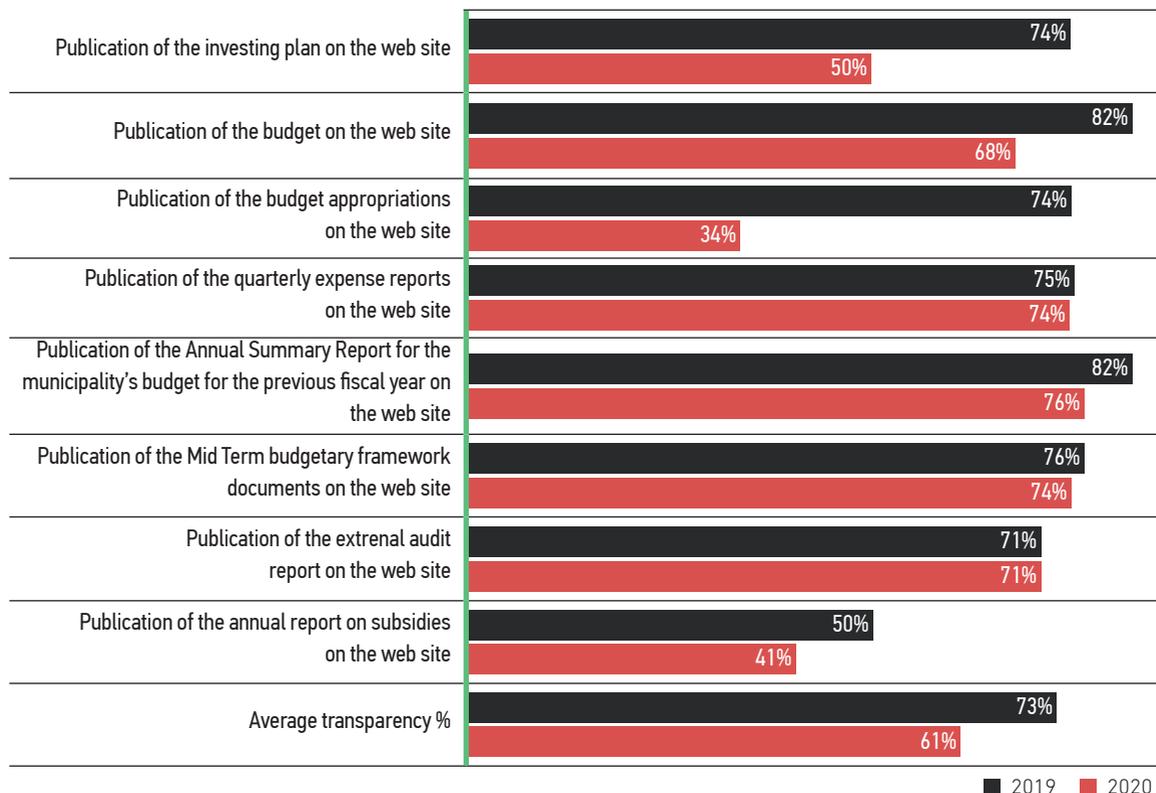
The highest decrease of transparency in this pillar is marked in publishing of investment plan (-24%) and amendment to budget appropriations (-42%).

#	Municipality	Points
1	Gjakova/Đakovica	25.00
1	Lipjan/Ljipljane	25.00
1	Pristina	25.00
3	Dragash/Dragaš	21.88
3	Glllogoc/Glogovac	21.88
3	Ferizaj/Uroševac	21.88
3	Hani i Elezit/Elez Han	21.88
3	Junik	21.88
3	Malishevë/Malisevo	21.88
3	Rahovec/Orahovac	21.88
3	Vushtrri/Vučitrn	21.88
12	Deçan/Dečan	20.31
13	Klllokot/Klokot	18.75
13	South Mitrovica	18.75
13	Podujeva/Podujevo	18.75
13	Prizren	18.75
13	Shtime/Štimlje	18.75
13	Skënderaj/Srbica	18.75
19	Fushë Kosova/ Kosovo Polje	15.63
19	Gračanicë/Gračanica	15.63
19	Kamenicë/Kamenica	15.63
19	Obiliq/Obilić	15.63
19	Pejë/Peć	15.63
19	Suhareka/Suva Reka	15.63
19	Viti/Vitina	15.63
26	Gjilan/Gnjilane	12.50
26	Istog/Istok	12.50
26	Kaçanik/Kaçanik	12.50
26	Klinë/Klina	12.50
26	Mamushë/Mamuša	12.50
31	Ranillug/Ranilug	9.38
31	Shtërpçë/Štrpce	9.38
33	Novo Bërdë/Novo Brdo	6.25
34	Leposaviq/Leposavić	0.00
34	North Mitrovica	0.00
34	Partesh/Parteš	0.00
34	Zubin Potok	0.00
34	Zveçan/Zvečan	0.00



The following chart shows performance by indicators:

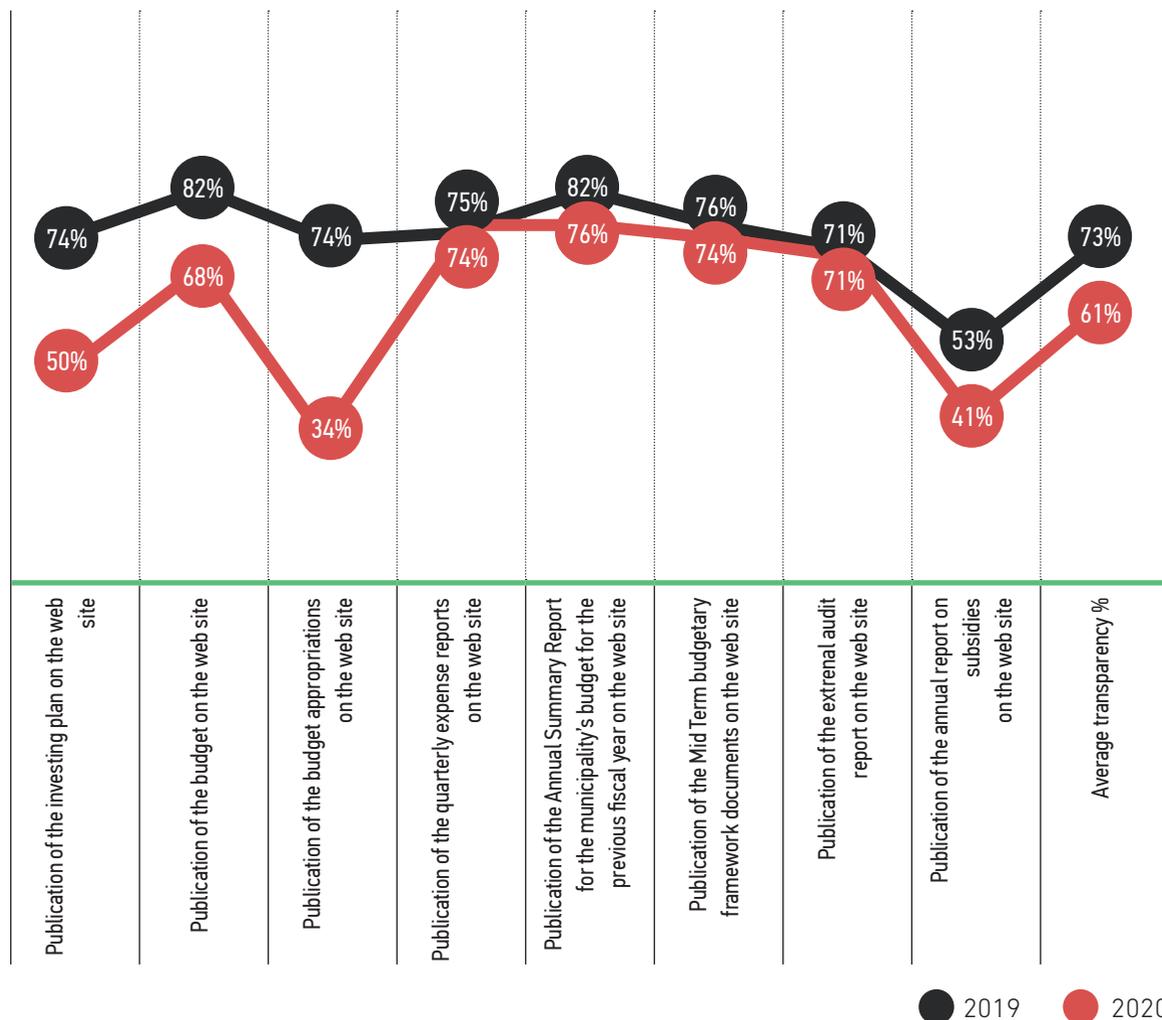
**BUDGETARY TRANSPARENCY PER INDICATOR (%)**



|||||

The following chart illustrates budget transparency trends for the years 2019 – 2020:

### Transparency in municipal budget per indicator (%) 2019 - 2020



|||||



# Publication of the investment plan on the web site

According to the Ministry of the Local Government (MLG) Administrative Instructions 01/2015, all municipalities are legally required to publish the investment plan. In 2020, 19 of 38 municipalities published their investment plans on their web sites. The following is the list of municipalities that fulfilled this legal requirement:

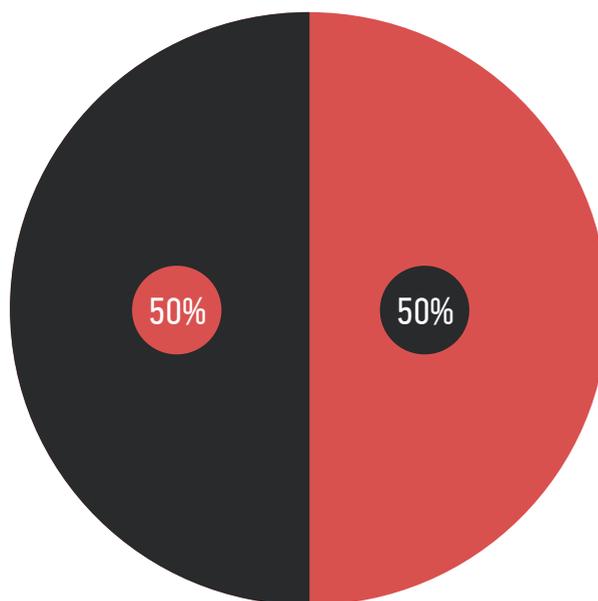
- |                             |                          |                      |
|-----------------------------|--------------------------|----------------------|
| 1 Dečan/Dečan               | 8 Hani i Elezit/Elez Han | 14 Podujeva/Podujevo |
| 2 Dragash/Dragaš            | 9 Junik                  | 15 Pristina          |
| 3 Gllgoc/Glogovac           | 10 Klllokot/Klokot       | 16 Prizren           |
| 4 Ferizaj/Uroševac          | 11 Lipjan/Ljiplane       | 17 Rahovec/Orahovac  |
| 5 Fushë Kosova/Kosovo Polje | 12 Malishevë/Mališevo    | 18 Skënderaj/Srbica  |
| 6 Gjakova/Đakovica          | 13 Mitrovicë e Jugut     | 19 Vushtrri/Vuçitrn  |
| 7 Graçanicë/Gračanica       |                          |                      |

Municipalities that do not publish the investment plan

19

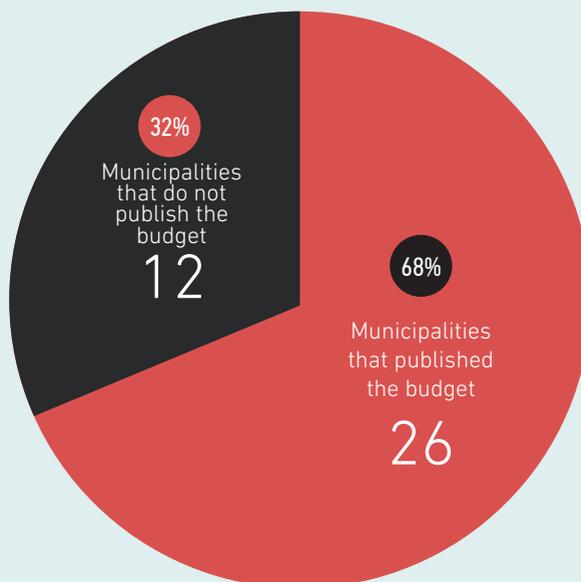
Municipalities that published the investing plan

19



# Publication of the approved budget on the web site

During the period January to December 2020, 26 municipalities published their budget plans on their web sites. This is a change in transparency by **-14%** compared to the previous year, from 82% in 2018 to 68% in 2020.



The following is the list of municipalities that published the budget in 2020:

- |                             |                          |                       |
|-----------------------------|--------------------------|-----------------------|
| 1 Deçan/Dečan               | 10 Junik                 | 19 Podujeva/Podujevo  |
| 2 Dragash/Dragaš            | 11 Kaçanik/Kaçanik       | 20 Pristina           |
| 3 Glogoc/Glogovac           | 12 Klllokot/Klllokot     | 21 Prizren            |
| 4 Ferizaj/Uroševac          | 13 Lipjan/Ljiplane       | 22 Rahovec/Orahovac   |
| 5 Fushë Kosova/Kosovo Polje | 14 Malishevë/Mališevo    | 23 Skënderaj/Srbica   |
| 6 Gjakova/Đakovica          | 15 Mamushë/Mamuša        | 24 Suhareka/Suva Reka |
| 7 Graçanicë/Gračanica       | 16 South Mitrovica       | 25 Viti/Vitina        |
| 8 Hani i Elezit/Elez Han    | 17 Novo Bërdë/ Novo Brdo | 26 Vushtrri/Vučitrn   |
| 9 Istog/Istok               | 18 Pejë/Peć              |                       |

## Publication of changes to budget appropriations on the web site

In 2020, in response to pandemics, the Government of Kosovo did one amendment to the Law on Budget appropriations for 2020<sup>19</sup>, with the aim of relocating the funds in response to the health and social welfare means. 19 of 38 municipalities benefited from this amendment, however, only three municipalities (Gjakova/Đakovica, Lipjan/Ljiplane and Pristina) published the amended law on the budget appropriations on their web sites.

## Publication of the quarterly financial reports on the web sites

The current legal framework<sup>20</sup> requires publication of quarterly and annual expense reports by all public financial institutions.

The following municipalities published their quarterly financial reports on their website:

- |                             |                       |                       |
|-----------------------------|-----------------------|-----------------------|
| 1 Deçan/Dečan               | 9 Junik               | 16 Pristina           |
| 2 Dragash/Dragaš            | 10 Kaçanik/Kaçanik    | 17 Prizren            |
| 3 Glllogoc/Glogovac         | 11 Lipjan/Ljiplane    | 18 Rahovec/Orahovac   |
| 4 Ferizaj/Uroševac          | 12 Malishevë/Mališevo | 19 Skënderaj/Srbica   |
| 5 Fushë Kosova/Kosovo Polje | 13 Mitrovicë e Jugut  | 20 Suhareka/Suva Reka |
| 6 Gjakova/Đakovica          | 14 Pejë/Peć           | 21 Viti/Vitina        |
| 7 Graçanicë/Gračanica       | 15 Podujeva/Podujevo  | 22 Vushtrri/Vučitrn   |
| 8 Hani i Elezit/ Elez Han   |                       |                       |

19 LAW NO. 07/L -014 LAW ON AMENDING AND SUPPLEMENTING THE LAW No. 07/L-001 ON BUDGET APPROPRIATIONS FOR THE BUDGET OF REPUBLIC OF KOSOVO FOR YEAR 2020

20 See list of Indicators



# Publication of the annual summary report for the municipality's budget for the previous fiscal year on the web site

According to the Ministry of the Local Government Administration (MLGA) Administrative Instructions 01/2015, all municipalities are legally required to publish the annual summary report for the previous fiscal year on their web site. In 2020, 24 of 38 municipalities published the annual summary report on their web sites. This marks a change by - 6% , respectively from 82% in 2019 to 76% in 2020.

The following municipalities published the annual summary report for the municipality's budget for the previous fiscal year on the web site:

- |                             |                       |                       |
|-----------------------------|-----------------------|-----------------------|
| 1 Deçan/Dečan               | 9 Istog/Istok         | 17 Podujeva/Podujevo  |
| 2 Dragash/Dragaš            | 10 Junik              | 18 Pristina           |
| 3 Glllogoc/Glogovac         | 11 Kaçanik/Kaçanik    | 19 Prizren            |
| 4 Ferizaj/Uroševac          | 12 Klllokot           | 20 Rahovec/Orahovac   |
| 5 Fushë Kosova/Kosovo Polje | 13 Lipjan/Ljiplane    | 21 Skënderaj/Srbica   |
| 6 Gjakova/Đakovica          | 14 Malishevë/Mališevo | 22 Suhareka/Suva Reka |
| 7 Graçanicë/Gračanica       | 15 Mamushë/Mamuša     | 23 Viti/Vitina        |
| 8 Hani i Elezit             | 16 Pejë/Peć           | 24 Vushtrri/Vučitrn   |







- |                             |                       |                       |
|-----------------------------|-----------------------|-----------------------|
| 1 Deçan/Dečan               | 9 Junik               | 17 Pristina           |
| 2 Dragash/Dragaš            | 10 Klllokot/Klokot    | 18 Prizren            |
| 3 Glllogoc/Gllogovac        | 11 Lipjan/Ljiplane    | 19 Rahovec/Orahovac   |
| 4 Ferizaj/Uroševac          | 12 Malishevë/Mališevo | 20 Skënderaj/Srbica   |
| 5 Fushë Kosova/Kosovo Polje | 13 Mamushë/Mamuša     | 21 Suhareka/Suva Reka |
| 6 Gjakova/Đakovica          | 14 South Mitrovica    | 22 Viti/Vitina        |
| 7 Hani i Elezit/Elez Han    | 15 Pejë/Peć           | 23 Vushtrri/Vučitrn   |
| 8 Istog/Istok               | 16 Podujeva/Podujevo  |                       |

## Publication of the annual report on subsidies on the web site

Publication of the annual report on subsidies is a good governance indicator. This indicator is important because it provides the public with information on how public funds are divided and awarded by municipalities in support to the local economy, cultural, and sport activities. In 2020, 14 out of 38 municipalities published the annual report on subsidies on their websites. The following is the list of municipalities that publish this report:

- |                     |                          |                     |
|---------------------|--------------------------|---------------------|
| 1 Deçan/Dečan       | 6 Hani i Elezit/Elez Han | 11 South Mitrovica  |
| 2 Dragash/Dragaš    | 7 Junik                  | 12 Pristina         |
| 3 Glllogoc/Glogovac | 8 Lipjan/Ljiplane        | 13 Rahovec/Orahovac |
| 4 Ferizaj/Uroševac  | 9 Malishevë/Mališevo     | 14 Vushtrri/Vučitrn |
| 5 Gjakova/Đakovica  | 10 Mamushë/Mamuša        |                     |



# PILLAR III:

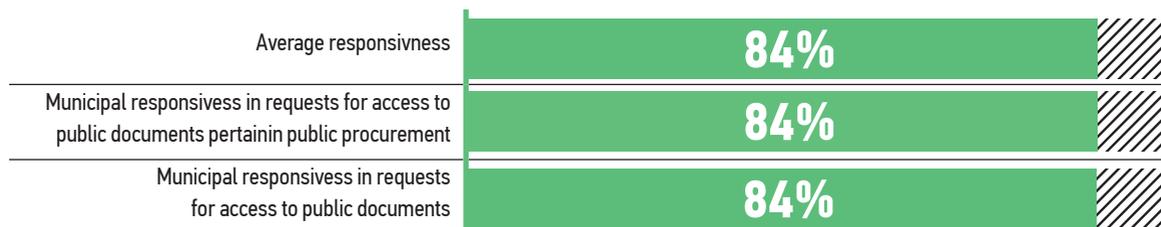
## Access to public documents

The Transparency Index measures, in Pillar 3, access to public documents. Through this Pillar, KDI observed the extent to which the Law on Access to Public Documents is implemented. In addition, KDI assessed the ability of citizens, civil society organizations, and media to use this mechanism to demand accountability from municipal institutions. The maximum score in this pillar is 10 while the minimum score is zero. The overall municipal responsiveness to requests for access to public documents is at 84%. KDI sent 38 requests for access to public information and received a municipal response from 32 municipalities; six municipalities did not respond. Based on the information provided by municipalities, out of 843 requests, only 2 were rejected based on the legal dispositions on data protection/confidentiality of information.

### THE NUMBER OF REQUESTS FOR ACCESS TO DOCUMENTS SENT BY KDI TO MUNICIPALITIES AND RESPONSES TO SUCH REQUESTS

MUNICIPALITIES	38
SUBMITTED REQUESTS FOR ACCESS	38
RESPONDED TO REQUESTS	32
DID NOT RESPOND TO REQUESTS	6

### MUNICIPAL RESPONSIVENESS IN REQUESTS FOR ACCESS TO PUBLIC DOCUMENTS (%)



In this Pillar, the focus was on requests for access to public documents in public procurement. According to the information provided by municipalities in response to the request from KDI, citizens submitted 835 requests for access to public documents to 32 municipalities that provided the information for 2020. Of these, 327 were related to public procurement. Municipalities with the largest number of requests for access to public documents were Pristina with 94, Gjakova/Đakovica with 83 and Ferizaj/Uroševac with 79 requests for access to public document.

32 out of 38 municipalities responded to the KDI survey providing data on the request for access to public documents, while seven municipalities did not provide that information.

### LIST OF MUNICIPALITIES THAT DID NOT PROVIDE INFORMATION PERTAINING REQUESTS FOR ACCESS TO PUBLIC DOCUMENTS

1	Gračanicë/Gračanica
2	Klllokot/Klokot
3	North Mitrovica
4	Novo Bërdë/Novo Brdo
5	Partesh/Parteš
6	Ranillug/Ranilug

# PILLAR IV

## Information and public participation

To measure transparency of information provision to citizens pertaining civil engagement and information, KDI used the following indicators:

1. Are tender opening sessions opened to public?
2. How often do the citizens use the municipal web site?
3. How many times have the citizens visited the municipal web sites?
4. Is the draft budget published for public consultations?
5. Are draft decisions and/or agendas published for consultation with public?
6. Can citizens send an online letter of enquiry to the Municipality?
7. Number of Budget Hearings (min. 2 per year)?
8. Is the organizational scheme including public enterprises and the subordinate institutions published in the web site?

The maximum points assigned in this pillar are 15 while the minimum score is zero. The table to the right shows the ranking of municipalities by the individual scoring in this pillar.

The average level of transparency in public information and public participation is 83%.

While all tender opening sessions are opened to the public, and 89% of municipalities have built modules on their web sites for easy and direct communication with citizens, 71% of the municipalities published their draft budget for public consultation, and 76% also published their draft agendas and decisions for consultation with citizens.

#	Municipality	Points
1	Drenas	15.00
1	Ferizaj/Uroševac	15.00
1	Gjakova/Đakovica	15.00
1	Gjilan/Gnjilane	15.00
1	Hani i Elezit/Elez Han	15.00
1	Istog/Istok	15.00
1	Junik	15.00
1	Kaçanik/Kaçanik	15.00
1	Kamenicë	15.00
1	Lipjan	15.00
1	Malishevë	15.00
1	Mamushë/Mamuša	15.00
1	Mitrovicë	15.00
1	Obiliq	15.00
1	Partesh	15.00
1	Pejë/Peć	15.00
1	Podujeva/Podujevo	15.00
1	Prishtinë	15.00
1	Prizren	15.00
1	Rahovec/Orahovac	15.00
1	Shtime/Štimlje	15.00
1	Skënderaj/Srbica	15.00
1	Suhareka/Suva Reka	15.00
1	Viti/Vitina	15.00
1	Vushtrri	15.00
26	Graçanicë	12.00
26	Klinë	12.00
26	Novo Bërdë	12.00
29	Fushë Kosova/ Kosovo Polje	10.50
30	Deçan	9.00
30	Dragash/Dragaš	9.00
30	Shtërpçë/Štrpce	9.00
33	Kllokot	7.50
34	Ranillug	6.00
34	Zveçan/Zvečan	6.00
36	Zubin Potok	3.00
37	Leposaviq/Leposavić	1.50
37	Mitrovicë e Veriut	1.50

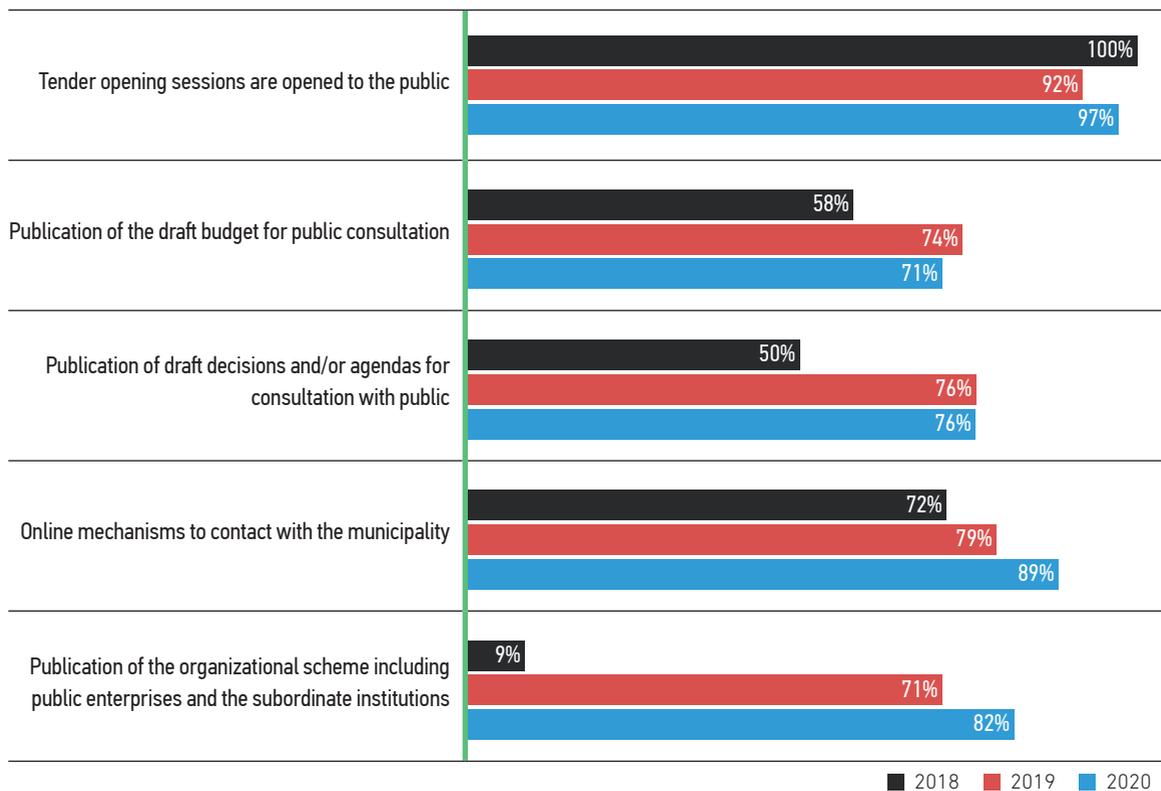


Besides being challenged with pandemics COVID-19, and gathering and movement restrictions, municipalities showed proactive in involving the public into the decision-making process. While respecting the health measures which limited the numbers of participants, municipalities also organized public hearings using digital platforms. Although working with limited capacities, and using both methods (physical and digital) in 2020, they organized 162 public hearings exceeding the legally mandated minimum of two such public hearings per year.

In 2020, 82% of municipalities published their organograms and basic regulating legislation for these entities. Even though some smaller municipalities do not own public enterprises, and receive their services from the regional level, their citizens are in daily contract with the service providers. These services include water supply, sewage systems, waste collection, etc., for which the citizens have regular concerns, thus the information on how they operate, and who is responsible at what lever for their oversight should be available to them. Pandemics has shown the public interest in municipal governance had decreased comparing to the previous year (2019) when the municipal websites were visited **6,542,769** times. However, in 2020, municipal web sites were still visited **4,167,112** times (indicating multiple return visits of 1,248,850 visitors for a country with a population of only 1,809,481).

The following chart shows the transparency comparison for the period 2018 - 2020:

**TRANSPARENCY IN PUBLIC INFORMATION AND PUBLIC PARTICIPATION(%)**





# Openess and public consultation

## TENDER OPENING SESSIONS

According to the Information received from 32 municipalities who responded to the requests for access to public information, all tender opening sessions are open to the public, however six municipalities responded the tender sessions are open with prior request due to space limitations. During the tender opening sessions, competing business, citizens, and monitoring organizations can observe the procedures and offered prices.

## PUBLICATION OF DRAFT BUDGET FOR PUBLIC CONSULTATIONS

In 2020, 28 municipalities published the draft budget for public consultation. The following is the list of municipalities who published the draft budget:

- |                          |                          |                       |
|--------------------------|--------------------------|-----------------------|
| 1 Glogoc/Glogovac        | 11 Lipjan/Ljiplane       | 20 Pristina           |
| 2 Ferizaj/Uroševac       | 12 Malishevë/Mališevo    | 21 Prizren            |
| 3 Gjakova/Đakovica       | 13 Mamushë/Mamuša        | 22 Rahovec/Orahovac   |
| 4 Gjilan/Gnjilane        | 14 South Mitrovicë       | 23 Shtërpcë/Štrpce    |
| 5 Graçanicë              | 15 Novo Bërdë /Novo Brdo | 24 Shtime/Štimlje     |
| 6 Hani i Elezit/Elez Han | 16 Obiliq/Obilić         | 25 Skënderaj/Srbica   |
| 7 Istog/Istok            | 17 Partesh/Parteš        | 26 Suhareka/Suva Reka |
| 8 Junik                  | 18 Pejë/Peć              | 27 Viti/Vitina        |
| 9 Kaçanik/Kaçanik        | 19 Podujeva/Podujevo     | 28 Vushtrri/Vučitrn   |
| 10 Kamenicë              |                          |                       |

## PUBLICATION OF DRAFT DECISIONS AND/OR AGENDAS FOR CONSULTATION WITH PUBLIC

In addition to the draft budget, in 2020, 30 municipalities published their draft decisions and agendas for consultation with the public. The following is the list of municipalities that published these documents for consultation:





- |                             |                           |                       |
|-----------------------------|---------------------------|-----------------------|
| 1 Ferizaj/Uroševac          | 11 Klinë/Klina            | 21 Podujeva/Podujevo  |
| 2 Fushë Kosova/Kosovo Polje | 12 Kllokot/Klokot         | 22 Pristina           |
| 3 Gjakova/Đakovica          | 13 Lipjan/Ljiplane        | 23 Prizren            |
| 4 Gjilan/Gnjilane           | 14 Malishevë/Mališevo     | 24 Rahovec/Orahovac   |
| 5 Graçanicë/Gračanica       | 15 Mamushë/Mamuša         | 25 Shtërpcë/Štrpce    |
| 6 Hani i Elezit/Elez Han    | 16 South Mitrovica        | 26 Shtime/Štimlje     |
| 7 Istog/Istok               | 17 Novo Bërdë / Novo Brdo | 27 Skënderaj/Srbica   |
| 8 Junik                     | 18 Obiliq/Obilić          | 28 Suhareka/Suva Reka |
| 9 Kaçanik/Kaçanik           | 19 Partesh/Parteš         | 29 Viti/Vitina        |
| 10 Kamenicë                 | 20 Pejë/Peć               | 30 Vushtrri/Vučitrn   |

## PUBLIC HEARINGS

Besides challenges with pandemics COVID-19, municipalities have been very active with regard to public hearings pertaining to budget approval. The required number of public hearings is a minimum of two for the budget circular as part of the budget hearing. According to the data received from the 31 municipalities, using digital platforms and small gathering within the permits by the National Health Institution of Kosovo, during 2020, these municipalities organized 169 public hearings, which were attended by 7,718 citizens. Public hearings organized through digital platforms prompted a higher public participation. The most effective public engagement was shown to be through social media, where the outreach was higher. The following municipalities had the highest number of the public hearings in 2020:

#	Municipality	Number of public hearings (minimum 2 a year)	Number of participants
1	Lipjan/Ljiplane	22	500
2	Rahovec/Orahovac	15	155
3	Drenas	14	342
4	Shtime/Štimlje	13	470
5	Viti/Vitina	13	225



|||||

## Citizens' visits to municipal web sites

To answer the question why the municipalities should publish the public documents on their web sites, even when there are central platforms, KDI obtained the information pertaining to the visits to the municipal websites.

According to information received from the Ministry of Local Government Administration (MAPL), the municipal web sites in 2020 were visited **4,167,112** times. The table below illustrated the number of visitors and visits to the web site versus the number of population<sup>23</sup>.

#	Municipality	# of visitors to the web site (2020)	# of visits to the web site (2020)	# of population according to 2011 Census	visitors vs. population in %	visits vs. population in %
1	Dečan/Dečan	26,164	49,866	40,019	65%	125%
2	Dragash/Dragaš	24,954	62,777	33,997	73%	185%
3	Gllgoc/Glogovac	55,358	378,241	58,531	95%	646%
4	Ferizaj/Uroševac	35,884	78,286	108,610	33%	72%
5	Fushë Kosova/ Kosovo Polje	37,755	105,876	34,827	108%	304%
6	Gjakova/Đakovica	42,366	159,679	94,556	45%	169%
7	Gjilan/Gnjilane	45,658	173,604	90,178	51%	193%
8	Graçanicë/Gračanica	16,026	30,130	10,675	150%	282%
9	Hani i Elezit/Elez Han	14,051	25,308	9,403	149%	269%
10	Istog/Istok	31,102	78,589	39,289	79%	200%
11	Junik	8,314	17,551	6,084	137%	288%
12	Kaçanik/Kaçanik	25,378	57,980	33,409	76%	174%
13	Kamenicë/Kamenica	34,324	96,798	36,085	95%	268%
14	Klinë/Klina	33,475	83,375	38,496	87%	217%
15	Klllokot/Klokot	6,076	15,147	2,556	238%	593%

23 2011 Census, ASK: <http://ask.rks-gov.net/media/2009/kosovo-census-atlas-2011.pdf>

|||||

TRANSPARENCY INDEX FOR MUNICIPAL GOVERNANCE 2020

|||||

16	Leposaviq/ Leposavić	2,609	10,460	13,773	19%	76%
17	Lipjan/Ljiplane	50,551	215,901	57,605	88%	375%
18	Malishevë/Mališevo	33,737	76,956	54,613	62%	141%
19	Mamushë/Mamuša	7,486	20,273	5,507	136%	368%
20	South Mitrovica	39,426	100,726	84,235	47%	120%
21	North Mitrovica	3,038	10,860	29,460	10%	37%
22	Novobërdë/Novo Brdo	13,244	28,322	6,729	197%	421%
23	Obiliq/Obilić	29,768	68,387	21,549	138%	317%
24	Partesh/Parteš	7,859	13,224	1,787	440%	740%
25	Peja/Peć	37,679	85,047	96,450	39%	88%
26	Podujeva/Podujevo	39,735	118,037	88,499	45%	133%
27	Pristina	270,293	1,310,692	198,897	136%	659%
28	Prizren	51,940	228,739	177,781	29%	129%
29	Rahovec/Orahovac	35,951	79,163	56,208	64%	141%
30	Ranilug	7,685	12,985	3,866	199%	336%
31	Shtërpçë/Štrpce	10,185	15,950	6,949	147%	230%
32	Shtime/Štimlje	26,316	46,558	27,324	96%	170%
33	Skënderaj/Srbica	33,800	67,888	50,858	66%	133%
34	Suhareka/Suva Reka	35,209	78,661	59,722	59%	132%
35	Viti/Vitina	31,973	61,537	46,987	68%	131%
36	Vushtrri/Vučitrn	38,693	96,392	69,870	55%	138%
37	Zubin Potok	2,282	3,461	6,616	34%	52%
38	Zvečan/Zvečan	2,506	3,686	7,481	33%	49%

<b>TOTAL</b>		<b>1,248,850</b>	<b>4,167,112</b>	<b>1,809,481</b>	<b>69%</b>	<b>230%</b>
--------------	--	------------------	------------------	------------------	------------	-------------

|||||

# Communication with the municipality

To measure the ease of access to communication with municipalities, KDI also verified the means to communicate with the municipalities using online tools. 34 of 38 municipalities have contact boxes and/or other online mechanisms where the citizens can submit their inquiry and it will be delivered to the municipality's information desk. The following is the list of municipalities who have online communication mechanisms on their web sites:

- |                             |                       |                       |
|-----------------------------|-----------------------|-----------------------|
| 1 Deçan/Dečan               | 13 Kamenicë/Kamenica  | 25 Pristina           |
| 2 Dragash/Dragaš            | 14 Klinë/Klina        | 26 Prizren            |
| 3 Glogoc/Glogovac           | 15 Lipjan/Ljiplane    | 27 Rahovec/Orahovac   |
| 4 Ferizaj/Uroševac          | 16 Malishevë/Mališevo | 28 Ranilug            |
| 5 Fushë Kosova/Kosovo Polje | 17 Mamushë/Mamuša     | 29 Shtërpcë/Štrpce    |
| 6 Gjakova/Đakovica          | 18 South Mitrovicë    | 30 Shtime/Štimlje     |
| 7 Gjilan/Gnjilane           | 19 Novo Bërdë/        | 31 Skënderaj/Srbica   |
| 8 Graçanicë/Gračanica       | 20 Novo Brdo          | 32 Suhareka/Suva Reka |
| 9 Hani i Elezit/Elez Han    | 21 Obiliq/Obilić      | 33 Viti/Vitina        |
| 10 Istog/Istok              | 22 Partesh/Parteš     | 34 Vushtrri/Vučitrn   |
| 11 Junik                    | 23 Pejë/Peć           | 35 Zveçan/Zvečan      |
| 12 Kaçanik/Kaçanik          | 24 Podujeva/Podujevo  |                       |

# Information on municipal enterprises and subordinate institutions

One of the least transparent areas of municipal work, and the area that is often accused of corruption by citizens and civil society, is public enterprises. Citizens regularly use services provided by municipal public enterprises, especially utilities. While there are several municipalities that do not have public enterprises, there are regional public enterprises that provide services, and it is important for the municipalities to provide information to their citizens on their regulatory legislation, their functions, and to whom these public enterprises report on the municipal level. With the aim of verifying how much information the municipalities provide to their citizens pertaining to public enterprises, KDI has measured the following two indicators.

1. Is the organizational scheme including public enterprises and the subordinate institutions published on the web site?

In 2020, 31 municipalities published the organizational scheme including public enterprises and the subordinate institutions published on the web site. This is a change by +14.8% in transparency in comparison to 2019 when 27 municipalities published them.

# PILLAR V:

## Grants and funding

Grants and funding are additional activities through which municipalities spend the municipal budget.

To measure transparency in grants and funding, KDI used the following indicators:

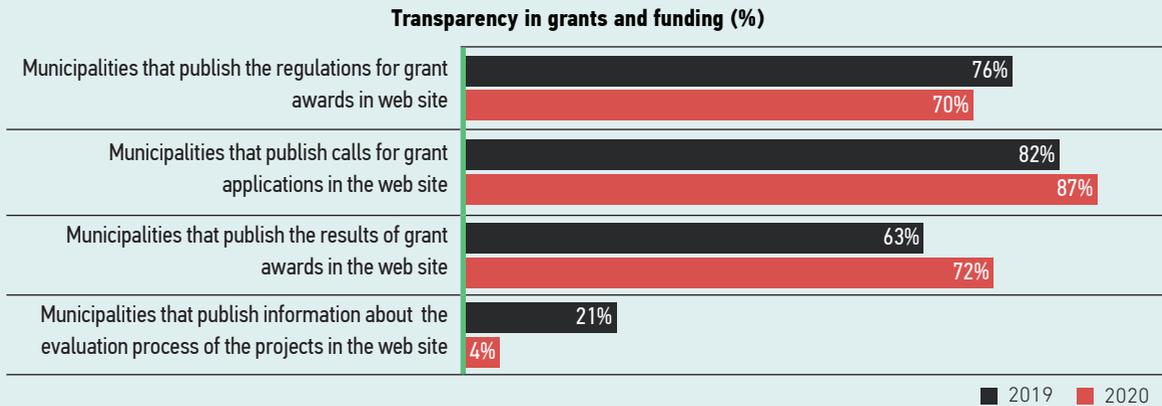
1. Are the regulations for grant awards published on the web site?
2. Are calls for grant applications published on the web site?
3. Are the results of grant awards published on the web site?
4. Is there information about the evaluation process of the projects?

The maximum points assigned in this pillar are 10 while the minimum score is zero. The table to the right shows the ranking of municipalities in this pillar. The average level of transparency in grants and funding is 58%.

87% of municipalities published their calls for grant applications, and 72% published the results of the awards, 70% of municipalities published the regulations for grant awards. Unfortunately, 2020 marked a huge decrease on publication of evaluation process for grant awards from 21% in 2019 to only 4% in 2020. (12 municipalities) have specific regulations for grants' (or subsidies') awards.

#	Municipality	Points
1	Pristina	10.00
2	Lipjan/Ljipljane	8.75
3	Dragash/Dragaš	7.50
3	Glllogoc/Glogovac	7.50
3	Ferizaj/Uroševac	7.50
3	Gjakova/Đakovica	7.50
3	Gjilan/Gnjilane	7.50
3	Hani i Elezit/Elez Han	7.50
3	Junik	7.50
3	Kaçanik/Kaçanik	7.50
3	Kamenicë/Kamenica	7.50
3	Malishevë/Mališevo	7.50
3	Mamushë/Mamuša	7.50
3	South Mitrovica	7.50
3	Obiliq/Obilić	7.50
3	Prizren	7.50
3	Skënderaj/Srbica	7.50
3	Suhareka/Suva Reka	7.50
3	Vushtrri/Vučitrn	7.50
20	Gračanicë/Gračanica	6.25
20	Klllokot/Klokot	6.25
20	Pejë/Peć	6.25
20	Podujeva/Podujevo	6.25
20	Rahovec/Orahovac	6.25
20	Shtime/Štimlje	6.25
20	Viti/Vitina	6.25
27	Deçan/Dečan	5.00
27	Klinë/Klina	5.00
27	Partesh/Parteš	5.00
29	Fushë Kosova/ Kosovo Polje	3.75
29	Istog/Istok	3.75
29	Novo Bërdë/Novo Brdo	3.75
29	Ranilug	3.75
34	Shtërpçë/Štrpce	1.25
35	Leposaviq/Leposavić	0.00
35	Mitrovicë e Veriut	0.00
35	Zubin Potok	0.00
35	Zveçan/Zvečan	0.00

The following chart shows the performance by each indicator in this pillar:



In 2020, 70% of municipalities published regulations for grant awards. The following 20 municipalities published these regulations:

- |                          |                       |                       |
|--------------------------|-----------------------|-----------------------|
| 1 Deçan/Dečan            | 8 Junik               | 15 Obiliq/Obilić      |
| 2 Dragash/Dragaš         | 9 Kaçanik/Kaçanik     | 16 Pristina           |
| 3 Glogoc/Glogovac        | 10 Kamenicë/Kamenica  | 17 Prizren            |
| 4 Ferizaj/Uroševac       | 11 Lipjan/Ljiplane    | 18 Skënderaj/Srbica   |
| 5 Gjakova/Đakovica       | 12 Malishevë/Mališevo | 19 Suhareka/Suva Reka |
| 6 Gjilan/Gnjilane        | 13 Mamushë/Mamuša     | 20 Vushtrri/Vučitrn   |
| 7 Hani i Elezit/Elez Han | 14 South Mitrovica    |                       |

|||||

While the following 13 municipalities include the regulations in their calls for applications:

- |                             |                     |                    |
|-----------------------------|---------------------|--------------------|
| 1 Fushë Kosova/Kosovo Polje | 6 Partesh/Parteš    | 10 Ranilug         |
| 2 Graçanicë/Gračanica       | 7 Pejë/Peć          | 11 Shtërpcë/Štrpce |
| 3 Istog/Istok               | 8 Podujeva/Podujevo | 12 Shtime/Štimlje  |
| 4 Kllokot/Klokot            | 9 Rahovec/Orahovac  | 13 Viti/Vitina     |
| 5 Novo Bërdë/ Novo Brdo     |                     |                    |

The following is the list of 33 (82%) municipalities who published calls for grants on their web sites:

- |                             |                           |                       |
|-----------------------------|---------------------------|-----------------------|
| 1 Deçan/Dečan               | 12 Kaçanik/Kaçanik        | 23 Pejë/Peć           |
| 2 Dragash/Dragaš            | 13 Kamenicë/Kamenica      | 24 Podujeva/Podujevo  |
| 3 Glllogoc/Glogovac         | 14 Klinë/Klina            | 25 Pristina           |
| 4 Ferizaj/Uroševac          | 15 Kllokot/Klokot         | 26 Prizren            |
| 5 Fushë Kosova/Kosovo Polje | 16 Lipjan/Ljiplane        | 27 Rahovec/Orahovac   |
| 6 Gjakova/Đakovica          | 17 Malishevë/Mališevo     | 28 Ranillug           |
| 7 Gjilan/Gnjilane           | 18 Mamushë/Mamuša         | 29 Shtime/Štimlje     |
| 8 Graçanicë/Gračanica       | 19 South Mitrovica        | 30 Skënderaj/Srbica   |
| 9 Hani i Elezit/Elez Han    | 20 Novo Bërdë / Novo Brdo | 31 Suhareka/Suva Reka |
| 10 Istog/Istok              | 21 Obiliq/Obilić          | 32 Viti/Vitina        |
| 11 Junik                    | 22 Partesh/Parteš         | 33 Vushtrri/Vučitrn   |

|||||



The following 28 municipalities (72%) published the results of grant awards on the web site.

- |                      |                      |                       |
|----------------------|----------------------|-----------------------|
| 1 Junik              | 8 Mamushë/Mamuša     | 15 Prizren            |
| 2 Kaçanik/Kaçanik    | 9 South Mitrovica    | 16 Rahovec/Orahovac   |
| 3 Kamenicë/Kamenica  | 10 Obiliq/Obilić     | 17 Shtime/Štimlje     |
| 4 Klinë/Klina        | 11 Partesh/Parteš    | 18 Skënderaj/Srbica   |
| 5 Klllokot/Klokot    | 12 Pejë/Peć          | 19 Suhareka/Suva Reka |
| 6 Lipjan/Ljiplane    | 13 Podujeva/Podujevo | 20 Viti/Vitina        |
| 7 Malishevë/Mališevo | 14 Pristina          | 21 Vushtrri/Vučitrn   |

Of 38 municipalities, only Municipality of Pristina/Pristina published their grant evaluation reports, while Lipjan/Ljiplane published the reports without the comparative tables.



# PILLAR VI:

## Professional ethics and conflict of interest

Integrity is one of the key elements in public financial management. To measure the mechanisms to support integrity and the fight against corruption, mismanagement, conflicts of interest, and abuse of official power, KDI used the following indicators to measure good governance mechanisms in municipalities:

1. Does the municipality have a code of ethics?
2. Is the Integrity Plan published on the web site?
3. Is there an instrument for reporting unethical behaviors, discrimination, or conflict of interest, and has assigned the responsible officer in accordance to the law on protection of the whistleblowers?
4. Are political affiliations or political party memberships for the assembly members published on the municipal web site?

The maximum points assigned in this pillar are eight while the minimum score is zero. The table to the right shows the ranking of municipalities in this pillar.

The average level transparency in professional ethics and conflict of interest is 76%. All municipalities must abide to the Code of Ethics for the public administration.

95% of municipalities have confirmed they have established structures and instruments for reporting unethical behaviors and have assigned the responsible officer as required by the Law on Protection of the Whistleblowers<sup>24</sup>, while five municipalities did not confirm if they have full-filled their obligations under the law on protection of whistleblowers.

<sup>24</sup> [LAW No. 06/L –085 ON PROTECTION OF WHISTLEBLOWERS](#)

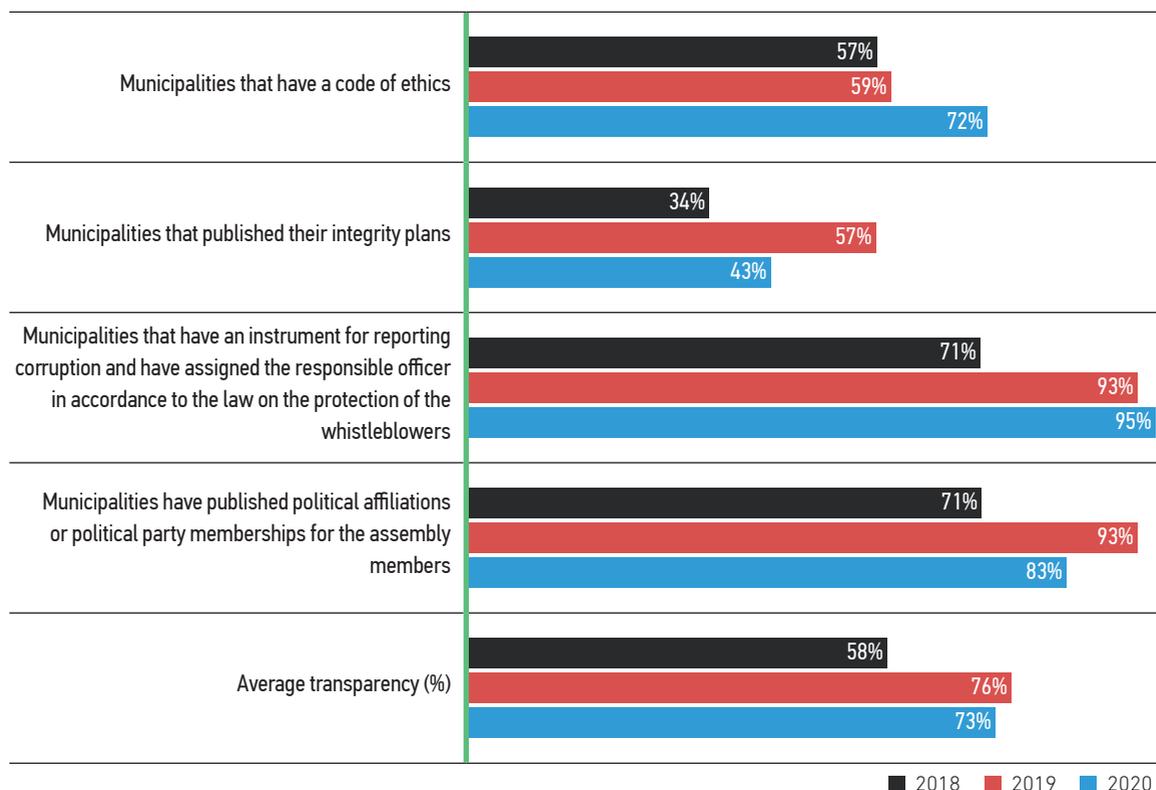
#	Municipality	Points
1	Glllogoc/Glogovac	10.00
1	Gjakova/Đakovica	10.00
1	Hani i Elezit/Elez Han	10.00
1	Junik	10.00
1	Lipjan/Ljipljane	10.00
1	Pejë/Peć	10.00
1	Pristina	10.00
1	Vushtrri/Vučitrn	10.00
1	Ferizaj/Uroševac	10.00
10	Deçan/Dečan	8.75
10	Kaçanik/Kaçanik	8.75
10	Malishevë/Mališevo	8.75
10	Mamushë/Mamuša	8.75
10	Shtime/Štimlje	8.75
10	Skënderaj/Srbica	8.75
10	Viti/Vitina	8.75
17	Gjilan/Gnjilane	7.50
17	Istog/Istok	7.50
17	Klinë/Klina	7.50
17	Podujeva/Podujevo	7.50
17	Prizren	7.50
17	Rahovec/Orahovac	7.50
23	Dragash/Dragaš	6.25
23	Fushë Kosova/ Kosovo Polje	6.25
23	Graçanicë/Gračanica	6.25
23	Kamenicë/Kamenica	6.25
23	South Mitrovica	6.25
23	Novo Bërdë/Novo Brdo	6.25
23	Obiliq/Obilić	6.25
23	Suhareka/Suva Reka	6.25
31	Ranilug	5.00
31	Shtërpçë/Štrpce	5.00
31	Zveçan/Zvečan	5.00
34	Klllokot/Klokot	3.75
34	Partesh/Parteš	3.75
34	Zubin Potok	3.75
35	Leposaviq/Leposavić	1.25
35	North Mitrovica	1.25



The Index has shown that 95% of municipalities have published political affiliation of their assembly members. 44% of municipalities have their own code of ethics, while only 43% of municipalities published their integrity plans.

The following charts show the municipal ranking by points earned on each of the above-mentioned pillars and indicators:

**TRANSPARENCY IN PROFESSIONAL ETHICS AND CONFLICT OF INTEREST(%) 2018 - 2020**



|||||

While all 38 municipalities operate under the code of ethics for public administration, 17 municipalities have drafted and approved their own municipal code of ethics. The following is the list of these municipalities:

- |                          |                      |                     |
|--------------------------|----------------------|---------------------|
| 1 Deçan/Dečan            | 7 Istog/Istok        | 13 Pristina         |
| 2 Glogoc/Glogovac        | 8 Junik              | 14 Prizren          |
| 3 Ferizaj/Uroševac       | 9 Klinë/Klina        | 15 Rahovec/Orahovac |
| 4 Gjakova/Đakovica       | 10 Lipjan/Ljiplane   | 16 Shtime/Štimlje   |
| 5 Gjilan/Gnjilane        | 11 Pejë/Peć          | 17 Vushtrri/Vučitrn |
| 6 Hani i Elezit/Elez Han | 12 Podujeva/Podujevo |                     |

In 2020, 16 (43%) of 38 municipalities published their valid integrity plans on their web sites. The following is the list of municipalities that published their integrity plans. Municipality of Deçan/Dečan has published the draft integrity plan for 2020 – 2022, however, due to pandemics, the plan was not approved during the period of this measuring.

- |                          |                      |                     |
|--------------------------|----------------------|---------------------|
| 1 Glogoc/Glogovac        | 7 Lipjan/Ljiplane    | 12 Rahovec/Orahovac |
| 2 Ferizaj/Uroševac       | 8 Malishevë/Mališevo | 13 Shtime/Štimlje   |
| 3 Gjakova/Đakovica       | 9 Mamushë/Mamuša     | 14 Skënderaj/Srbica |
| 4 Hani i Elezit/Elez Han | 10 Pejë/Peć          | 15 Viti/Vitina      |
| 5 Junik                  | 11 Pristina          | 16 Vushtrri/Vučitrn |
| 6 Kaçanik/Kaçanik        |                      |                     |

|||||



Additionally, 36 (95%) of 38 municipalities reported they have instrument for reporting unethical behaviors, discrimination, or conflicts of interest, and have assigned the responsible officer according to the law on protection of the whistleblowers. The following is a list of municipalities that have instruments for reporting unethical behaviors, discrimination, or conflicts of interest, including mechanisms for implementing the legal requirements for whistleblowing protection:

- |                             |                          |                       |
|-----------------------------|--------------------------|-----------------------|
| 1 Deçan/Dečan               | 13 Kamenicë/Kamenica     | 25 Pristina           |
| 2 Dragash/Dragaš            | 14 Klinë/Klina           | 26 Prizren            |
| 3 Glllogoc/Glogovac         | 15 Klllokot/Klokot       | 27 Rahovec/Orahovac   |
| 4 Ferizaj/Uroševac          | 16 Lipjan/Ljiplane       | 28 Ranilug            |
| 5 Fushë Kosova/Kosovo Polje | 17 Malishevë/Mališevo    | 29 Shtërpcë/Štrpce    |
| 6 Gjakova/Đakovica          | 18 Mamushë/Mamuša        | 30 Shtime/Štimlje     |
| 7 Gjilan/Gnjilane           | 19 South Mitrovica       | 31 Skënderaj/Srbica   |
| 8 Graçanicë/Gračanica       | 20 Novo Bërdë/ Novo Brdo | 32 Suhareka/Suva Reka |
| 9 Hani i Elezit/Elez Han    | 21 Obiliq/Obilić         | 33 Viti/Vitina        |
| 10 Istog/Istok              | 22 Partesh/Parteš        | 34 Vushtrri/Vučitrn   |
| 11 Junik                    | 23 Pejë/Peć              | 35 Zubin Potok        |
| 12 Kaçanik/Kaçanik          | 24 Podujeva/Podujevo     | 36 Zveçan/Zvečan      |



|||||

In 2020, 83% of municipalities (33 of 38) have published on their web sites political affiliations or political party memberships for the assembly members. The following is a list of municipalities that have published on their web sites political affiliations or political party memberships for the assembly members:

- |                             |                           |                       |
|-----------------------------|---------------------------|-----------------------|
| 1 Deçan/Dečan               | 12 Kaçanik/Kaçanik        | 23 Pristina           |
| 2 Dragash/Dragaš            | 13 Kamenicë/Kamenica      | 24 Prizren            |
| 3 Glogoc/Glogovac           | 14 Klinë/Klina            | 25 Rahovec/Orahovac   |
| 4 Ferizaj/Uroševac          | 15 Lipjan/Ljiplane        | 26 Ranilug            |
| 5 Fushë Kosova/Kosovo Polje | 16 Malishevë/Mališevo     | 27 Shtërpcë/Štrpce    |
| 6 Gjakova/Đakovica          | 17 Mamushë/Mamuša         | 28 Shtime/Štimlje     |
| 7 Gjilan/Gnjilane           | 18 South Mitrovica        | 29 Skënderaj/Srbica   |
| 8 Graçanicë/Gračanica       | 19 Novo Bërdë / Novo Brdo | 30 Suhareka/Suva Reka |
| 9 Hani i Elezit/Elez Han    | 20 Obiliq/Obilić          | 31 Viti/Vitina        |
| 10 Istog/Istok              | 21 Pejë/Peć               | 32 Vushtrri/Vučitrn   |
| 11 Junik                    | 22 Podujeva/Podujevo      | 33 Zvečan/Zvečan      |

|||||

# CONCLUSIONS

In 2020, Kosovar municipalities were faced with multiple challenges in their governance. Facing with the COVID-19 pandemic had resulted in capacity limitations, movement restrictions, changes in investment priorities, health emergencies and revenue shortfalls, respectively tax collection.

These challenges showed to have influenced the previously good will of municipalities, by not achieving any positive changes in transparency. The average transparency measured in this index **changed by -1%** from 70% in 2019 to 69% in 2020.

The index showed that in 2020, when compared to the e-Procurement central platform, **only 24 municipalities published over 50% of their contract notices and contract award notices on their web sites.** While all notices are available in the e-Procurement platform, most citizens are not familiar with central activities, however they are more familiar to their municipal infrastructure.

The Index noted that the 25 municipalities who had started publishing their awarded contracts in 2019 and 2018, continued to do so, besides the staff limitations. Although not a legal obligation, in 2020, the same municipalities continued to publish **2,448** of their public contracts in PDF-format on their web sites. Also, in voluntarily bases, in 2020, 12 municipalities published 214 PRB decisions pertaining their procurement actions in their websites.

A negative trend was noted in budgetary transparency. Approximately **61%** of municipalities are publishing important planning and expenditure reports on

their web sites. The index shows an change by **-12%** (from 73% in 2019 to 61% in 2020) of municipalities publish documentation pertaining to budget planning and expenditures.

An improvement was noted in public participation. In comparison to 2019, from 32 responses to requests for information that were sent by KDI, all municipalities have reported to have met the legal requirement to hold public meetings with citizens.

New circumstances prompted municipalities to use new methods to stay close and consult with the public. Because of movement and gathering limitations caused by pandemics, a vast majority of municipalities organized most of their public hearings using digital platforms. Responses from municipalities showed that besides exceeding the minimal legal requirement of 2 public hearings per year, these 31 municipalities organized 169 hearings, with 16,718 participants (citizens). The greatest number of participants was noted in public hearings in social media.

Similar to the previous year's findings, also in 2020 web sites for all municipalities lack consistency and municipalities are unclear about what information they should present to the public about expenditure, and they lack instruction on naming format. Also, the municipalities continue to face technical problems where the uploaded documents cannot be opened.



Katalogimi në botim – (CIP)  
Biblioteka Kombëtare e Kosovës “Pjetër Bogdani”





ISBN 978-9951-745-26-0



9 789951 745260

KDI is a Non-Governmental Organization (NGO) engaged to support democracy development by involving citizens in public policy-making and strengthening civil society sector, with the aim to impact the increase of transparency and accountability by public institutions.

For more information on KDI, please visit [www.kdi-kosova.org](http://www.kdi-kosova.org)

With the financial support of:



**USAID**  
NGA POPULLI AMERIKAN  
OD AMERIČKOG NARODA