

ACCOUNTABILITY, LOADING:

A survey of open data for enhancing political integrity in the Western Balkans and Türkiye

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Türkiye**

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EXECUTIVE SUMMARY

Open data for political integrity

Political integrity, as defined by Transparency International, means consistently exercising political power for the common good, independent from private interests, and not leveraging power to maintain the wealth and position of the office holders.¹ To minimise the risk of undermining political integrity, it is essential to ensure that political officeholders are free from the undue influence of vested interests, that inclusive and open opportunities exist for influencing decision-making, and that office holders are held accountable for using power for private gain.²

This report underscores how open data can be utilised to uphold political integrity in the Western Balkans and Türkiye, focusing on three key areas: political financing, law-making and resource allocation. These three areas are of particular significance for anti-corruption and political integrity in the region given the existing evidence of opaque political finance, the undue influence of vested interests in law-making and favouritism in public contracting.³

The report analyses and compares 11 datasets⁴ pertaining to political integrity in Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia and Türkiye, as shown in Table 1.

TABLE 1. DATASETS ASSESSED⁵ IN THE WESTERN BALKANS AND TÜRKIYE

Policy input	
Assets and interests of public officials	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye
Directories of public officials	Bosnia and Herzegovina, ⁶ Kosovo, North Macedonia, Serbia, Türkiye
Lobbying register/meetings	Bosnia and Herzegovina, North Macedonia, Serbia, Türkiye
Political finance	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye
Policy output	
Awarded concessions for exploration of mineral goods	North Macedonia
Government budget	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye
Government spending	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye

Public procurement	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye
Public procurement, privatisation and other procedures	Serbia
Voting records	Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, Türkiye
Private sector data	
Company registers	Bosnia and Herzegovina, Kosovo, Serbia, Türkiye
Beneficial ownership	Bosnia and Herzegovina, Serbia, Türkiye
Land and real estate registers	Bosnia and Herzegovina, Serbia, Türkiye

Key common challenges

Our analysis of these datasets identified the following most common problems:

- + a lack of interoperability, which refers to the capability of different datasets to be matched and analysed together
- + formats in which the datasets are published
- + metadata and documentation, which serve the purpose of helping users understand the structure, sources and analytical limitations of the data
- + data collection issues, particularly regarding missing data

On the first point, some of the key datasets that are essential for detecting political corruption, such as political finance as well as the assets and interests of public officials, lack unique identifiers in most cases. This is particularly problematic with respect to the absence of unique identification numbers for firms associated with public officials. Specifically, the absence of these identifiers means that datasets of assets and interests of public officials cannot be automatically matched with other relevant datasets, such as company registers and public procurement records, which could aid in detecting potential conflicts of interests and favouritism in public contracting.

Second, the formats in which the datasets are published are generally not user-friendly, as they do not allow for bulk downloads in the majority of cases. With the exception of certain datasets, such as public procurement, government budgets and spending, which are available in machine-readable formats, other datasets such as political financing and assets and interests of public officials are typically provided in digital text formats or as scanned images in most cases.

Third, metadata and documentation are absent in all analysed datasets. The lack of information on the structure of the data, description of variables, explanation of sources and analytical limitations complicates any potential analysis of corruption risks.

Finally, missing data and delays in granting timely access to datasets pose significant challenges, particularly in the domains of public procurement, asset and income declarations, and political finance. These obstacles impede the potential for data analysis by interested parties. Furthermore, despite the availability of some datasets, such

as public procurement, in machine-readable formats, a lack of relevant variables for developing corruption risk indicators negatively impacts their quality and usability in certain cases.

The central recommendation of this study is therefore to make political integrity datasets in the Western Balkans and Türkiye accessible in line with the principles of the International Open Data Charter,⁷ especially regarding data formats, comparability, interoperability and timely publication.

INTRODUCTION

Political finance, law-making and allocation of public resources are particularly vulnerable to corruption in the Western Balkans and Türkiye.⁸ When political officeholders misuse public resources by directing public procurement contracts to politically connected companies, allow vested interests to exert undue influence on law-making, or offer favours to big businesses in exchange for political donations, they are committing political corruption.

Having a robust integrity system is a crucial safeguard against political corruption.⁹ With Kosovo joining the Open Government Partnership (OGP) in 2023, all Western Balkan countries have now expressed their commitment to open government standards.¹⁰ One component of a robust integrity system is having transparent and open political integrity data that can aid in deterring corrupt interests and practices and offer insights into the political finance of political actors and the links between politics and private interests through lobbying records and public procurement, as well as through assets and interest of public officials and company and beneficial ownership registers. These datasets may help identify potential conflicts of interest and favouritism in the allocation of public funds.

This study therefore focuses on analysing the quality of data on the activities that influence the integrity of political officeholders¹¹ in the Western Balkans and Türkiye. The report distinguishes between three groups of datasets, as shown in Table 1. These are: policy input data, which refers to information on the sources of influence on the policy process; policy output data, referring to information on the outcome of policy processes; and private sector data, which provides information on companies.

The aim of this study is to map out the existing political integrity data ecosystem in the region, with the goal of a) improving the capacity of state actors, media and civil society to detect and prevent political corruption using open data; b) enhancing domestic and cross-border exchanges between relevant stakeholders in using open data to detect political corruption; and c) identifying the current limitations of political integrity data in the region and highlighting the most crucial aspects of relevant datasets that require improvement.

The assessment of the quality of political integrity datasets is based on a standardised questionnaire designed to evaluate data quality, including its existence, online availability, timeliness, completeness, granularity, formats, openness, accessibility, interoperability, metadata, documentation and extent.¹² These dimensions reflect how well the analysed datasets align with open data principles such as those outlined in the International Open Data Charter. Figure 1 illustrates the average scores for each dataset analysed in the Western Balkans and Türkiye.

The remainder of this report discusses each assessed dataset, focusing on its relevance for political integrity, its significance for the context of the Western Balkans and Türkiye, and the main challenges identified regarding its data quality. The report concludes with recommendations.

FIGURE 1. THE AVERAGE SCORES OF POLITICAL INTEGRITY DATASETS IN THE WESTERN BALKANS AND TÜRKIYE



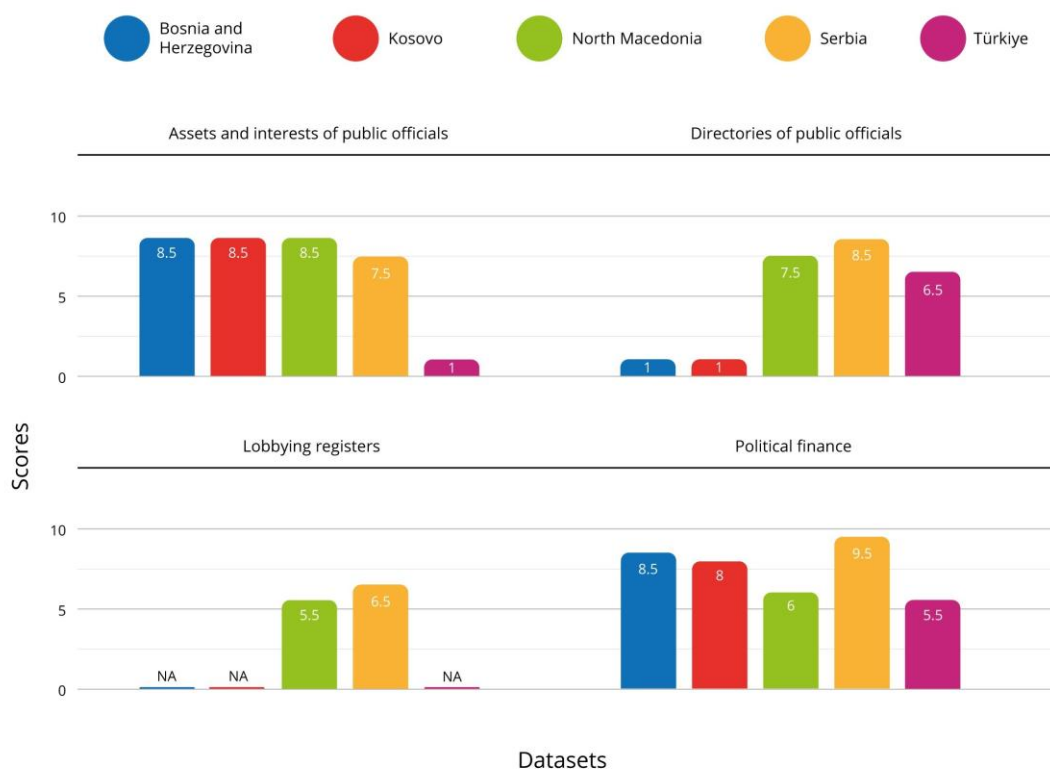
Note: Missing circles indicate that a dataset does not exist in the country in question or that it was not assessed within this study. Scores range from 0 (lowest) to 1.04 (highest). For a detailed methodology description, please refer to the Annex: Assessment questionnaire. For clarifications regarding Bosnia and Herzegovina, please refer to endnote 6.

POLICY INPUT DATA IN THE WESTERN BALKANS AND TÜRKIYE

Policy input data refers to datasets that provide information on the sources of influence on policy processes. Four policy input datasets were assessed within this study:

- + assets and interests of public officials
- + political finance
- + directories of public officials
- + lobbying registers and meetings

FIGURE 2. POLICY INPUT DATA IN THE WESTERN BALKANS AND TÜRKIYE



Note: The scores range from 0 (lowest) to 12.5 (highest). Missing bars indicate that a dataset does not exist in that country or that it was not assessed within this study. For a detailed methodology description, please refer to the Annex: Assessment questionnaire.

ASSETS AND INTERESTS OF PUBLIC OFFICIALS

Income, interest and asset declaration systems are widely recognised as essential tools for promoting public sector integrity and combating corruption.¹³ Specifically, they can be utilised in:

- + detecting illicit enrichment of public officials through systematic monitoring of changes in their wealth
- + preventing or exposing unchecked conflicts of interest
- + increasing public scrutiny and bolstering confidence in the integrity of public officials¹⁴

There exists a broad consensus that an effective system requires an independent and well-funded oversight body, mandatory and regularly submitted declarations, and public access to this information.¹⁵ Therefore, one important strategy in mitigating conflicts of interest and other breaches of political integrity relates to the disclosure of assets and interests of public officials through publicly accessible registers in line with the International Open Data Charter principles.

When these registers facilitate the verification of reported income against other databases, such as land and tax registers, or allow for comparison with prior declarations, they become an effective tool for detecting political corruption.¹⁶ Moreover, when made interoperable with other datasets such as public procurement and business registers, big data analysis could reveal whether politically connected companies have higher profitability, a greater share of awarded public procurement contracts, or larger tax debts in comparison to non-connected firms operating within the same markets.

Relevance for the Western Balkans and Türkiye

Extensive investigative research by journalists across the Western Balkans and Türkiye has documented instances of conflicts of interests and illicit enrichment among public officials. This body of research underscores the significance of maintaining transparent and publicly accessible data regarding asset, income and interest declarations. Specifically, this issue pertains to high-level public officials in the Western Balkans and Türkiye at national or subnational levels who have been implicated in hiding wealth, conflicts of interest, and failure to provide complete and timely declarations, as indicated by the examples in Box 1.

Research conducted in the region has additionally provided evidence of significant disparities between the income and property holdings of public officials. One instance of this can be observed in Serbia.¹⁷ Legal actions taken against public officials in the Western Balkans and Türkiye due to their failure to submit timely and accurate declarations often result in minor penalties or, in some cases, are entirely dismissed.¹⁸

The examples presented in Box 1 serve as illustrations of a recurring pattern. Research conducted in Bosnia and Herzegovina and Serbia, for example,¹⁹ reveals several instances of high-ranking political figures within the region concealing their property holdings. Furthermore, in April 2022, it was reported that the ambassador of Kosovo to Croatia, Martin Berishaj, was involved in an alleged financial scandal.²⁰ Namely, Slovenian media reported that he had received around €600,000 to his Montenegro based consulting firm from the Serbian branch of the Slovenian energy supplier GEN-I.²¹ The money was then allegedly gradually transferred to the current Prime Minister of Slovenia, Robert Golob, who denied any involvement in the alleged corruption scandal.²² Following the media coverage, the Anti-Corruption Agency (AKK) began to verify Berishaj's assets.²³ Moreover, the Prosecutor's Office announced that it had launched an investigation against Berishaj in relation to false reporting of assets.²⁴

Although the discussion concerning the regulatory framework for asset, income and interest declarations in the Western Balkans and Türkiye goes beyond the scope of this study, it is worth noting that across the region it frequently grapples with various deficiencies, including:

- + imposing either negligible fines or no fines at all for the failure to provide complete and timely declarations²⁵
- + a lack of human resources to verify the asset declarations
- + an ineffective adjudication of the declaration cases by judiciary
- + the complete exemption of certain categories of civil servants who hold positions with a high risk of corruption from the obligation to submit their declarations²⁶

Therefore, the supporting regulatory framework needs further improvement to incentivise public officials to submit timely, complete and accurate declarations.

Box 1. Failure to declare assets and interests in the Western Balkans and Türkiye

In **Bosnia and Herzegovina**, Fahrudin Radončić, the former Security Minister, failed to declare a yacht on two occasions: first, to the Central Electoral Commission (CIK) when he was elected Delegate to the Parliamentary Assembly, and second, to the Council of Ministers of Bosnia and Herzegovina when he became the Minister of Security.²⁷

In **Kosovo**, the former Kosovo ambassador to the US, Akan Ismail, failed to declare a sum of nearly 4 million Swiss francs (approx. €4.14 million) held in his Credit Suisse account, despite being obligated to report this to Kosovo's Agency for Prevention of Corruption.²⁸ Following the publication of research that unveiled this undisclosed information, the Special Prosecution of Kosovo initiated a case.²⁹

In **North Macedonia**, fugitive former Prime Minister Nikola Gruevski was tried in absentia and received a seven-year prison sentence for using his political party's funds from donations to illicitly purchase land properties in Skopje and other locations via an offshore company located in Belize.³⁰

In **Serbia**, the former Major of Brus, Milutin Jeličić, received an eight-month suspended sentence in 2019 for his failure to report a portion of his property to the Agency for Prevention of Corruption.³¹

In **Türkiye**, the wealth amnesty law was extended at the end of 2021 by decree, allowing individuals and entities to repatriate previously undeclared offshore assets and to declare previously undisclosed domestic assets without suffering any tax penalties and avoiding legal scrutiny.³²

Common challenges

With the exception of Türkiye, the declarations of assets and interests of public officials are publicly available in all other cases that are subject to this study. Nevertheless, these declarations present several common challenges.

The declarations are published in **data formats** that are not user-friendly. Specifically, asset and interest declarations are available on a case-by-case basis either in html format (Bosnia and Herzegovina, North Macedonia and Serbia) or as searchable PDF reports (Kosovo). These formats do not allow for downloading the datasets in bulk. Instead, they require web scraping to gather the data into a database. For example, in the

Serbian case, it is possible to send an API³³ request to retrieve the data in json format. This complicates any big data analysis compared to the convenience of machine-readable files that could be directly downloaded.

With regards to **data interoperability**, which refers to the capability of different datasets to be matched and analysed together, unique identifiers are not utilised, with the exception of Bosnia and Herzegovina's declarations, which contain a unique code only for political entities. Without unique identification numbers, these declarations cannot be matched with other relevant databases, such as company, public procurement and beneficial ownership registers. This major shortcoming complicates the matching of these with the other mentioned databases, which is essential to detect potential cases of illicit enrichment of public officials through politically connected firms and to identify corruption risks in the allocation of public resources.

Data collection itself is another problematic issue, particularly with regards to missing data, as only Kosovo provides complete declarations. In the Serbian case, the Agency for Prevention of Corruption's website clarifies that the absence of a public official's declaration in the database does not imply non-submission.³⁴

In addition, these declarations in all cases lack any **metadata or documentation** that would help in assessing their sources and analytical limitations.

The Serbian Agency for Prevention of Corruption also maintains a dataset on the involvement of companies associated with public officials in processes like public procurement, privatisation and other related procedures. Unlike asset and income declarations, this dataset contains unique identification numbers for firms, which makes it potentially interoperable with other relevant databases. However, this dataset is published in formats unsuitable for big data analysis, as it requires prior web scraping.

POLITICAL FINANCE

Political finance is an area particularly susceptible to corruption, as vested interests (big business, foreign governments, criminal organisations) may use hefty donations as a tool to exert influence on law-making and the allocation of public resources, resulting in state capture³⁵ and institutionalised grand corruption.³⁶

Having transparent data on financing of political parties, candidates and third parties is thus necessary to prevent undue influence on election outcomes and policy agendas. When political finance datasets are matched with datasets on public procurement, for example, they allow for examining whether businesses donating to parties benefit from big public procurement contracts, as well as whether corruption risks of public procurement contracts awarded to donor-related firms are higher compared to other firms in the same market. Political finance datasets can also be combined with company registers to assess changes in the financial performance of donor firms. These analyses can help in detecting potential conflicts of interest and corruption risks in the allocation of public funds.

Relevance for the Western Balkans and Türkiye

Although the Western Balkan countries³⁷ have made progress in harmonising their political finance legislation with the EU and international standards, a lack of transparency and accountability of political parties remains a challenging issue,³⁸ as shown in the examples in Box 2. Hence, the oversight role of civil society, citizens and investigative journalists is essential to expose any breaches of political finance regulations.

Box 2. Money politics in the Western Balkans

In **Bosnia and Herzegovina**, one report suggests that nine political parties received donations from private companies that won public tenders awarded by the executive branch of the government.³⁹ The country's law on political party financing forbids donations by such firms in cases where these private companies have received more than 10,000 KM⁴⁰ (approximately €5,130) in a calendar year in public tenders.⁴¹

In **Kosovo**, research has shown that political party donors gained around €220 million from public tenders between 2007 and 2014.⁴² The top of the list were the donors of the Democratic Party of Kosovo (PDK), followed by the donors of Vetëvendosje (Self-determination) (LVV).⁴³

In **North Macedonia**, fugitive and former Prime Minister Nikola Gruevski came under an investigation launched by the Special Prosecution Office (SPO) for the illegal financing of the VMRO-DPMNE political party. Gruevski was the prime suspect in accepting €4.9 million in illegal donations for his political party between 2009 and 2015 while he was Prime Minister.⁴⁴

In **Serbia**, several donors claimed that they helped the Serbian Progressive Party (SNS) to hide the origin of money during elections in 2017 by giving donations under their name to SNS with money they had previously received from the party.⁴⁵

Common challenges

To varying degrees, political finance information is publicly available in all analysed countries. It is only published on a timely basis in three out of the five (Bosnia and Herzegovina, Kosovo and Serbia). The available data, however, suffers from several important shortcomings.

With regards to **data formats**, none of the countries analysed offer machine-readable files of political finance data, meaning that bulk downloads are not possible. Instead, all countries offer data on a case-by-case basis, either in digital text format or as scanned PDF files. For example, in the case of Serbia, the data is accessible in html format through the Agency for Prevention of Corruption's website. This agency separately maintains databases for annual reports on the political finance of political entities and electoral campaign expenditure. In Bosnia and Herzegovina, political finance data is accessible on the website of the Central Electoral Commission (CIK) in the form of individual PDF documents. In Kosovo and North Macedonia, the data is only available in the form of scanned PDF documents.

With regards to **interoperability**, although Bosnia and Herzegovina and Serbia include the identification numbers of political entities, none of the reports contain identification numbers for donor firms or individual donors. Consequently, the political finance data cannot be matched with datasets on company registers and public procurement, for example, which would enable the analysis of potential conflicts of interest or risks of political favouritism in the allocation of public funds.

Serbia is a positive example with regards to the extent of **granularity** of political finance data, as it provides disaggregated data on campaign expenditures of political entities.⁴⁶ However, there are no regulations on third party financing, and there is no duty for individual candidates to report on their costs paid directly for the campaign.⁴⁷ Overall, the poorest quality of political finance data is in Türkiye, where the data is published with significant delay, without any common identifiers used, and in the form of financial audit reports.

Finally, like the asset and interest declarations, political finance datasets have no **metadata and documentation** in any of the analysed cases.

DIRECTORIES OF PUBLIC OFFICIALS

Directories of public officials refer to information on all public officials above certain seniority levels that allow citizens to know who performs public duties on their behalf. From the perspective of political integrity, their purpose is to enable matching with other databases, such as company, public procurement and beneficial ownership registers, in order to detect any potential conflicts of interest involving public officials. Additionally, this information can assist in verifying asset and interest declarations and detect any potential incompatibilities with regards to employment.

Relevance for the Western Balkans and Türkiye

In the absence or low availability of interest declarations, sources of donations received as candidates, or lobbying contacts with private individuals while in office, basic directories of public officials can help investigations on deeply embedded patronage networks widespread across the Western Balkans and Türkiye.⁴⁸ While integrity rules for public officials are largely in place and progressively more aligned with European standards over the years, compliance is still low. Bearing in mind the widespread issues with compliance with integrity systems, a complete, timely, up-to-date and user-friendly record of public officials would enable easier monitoring of potential breaches of political integrity.

In Serbia, for example, the investigative journalist analysis has shown that at least 87 candidates for the Serbian National Parliament between 2012 and 2020 violated the Law on the Agency for Prevention of Corruption.⁴⁹

In Kosovo, the former Mayor of Istog, Haki Rugova, faced allegations of a conflict of interest. The indictment was launched in 2018 and related to a case in 2014 where the municipality awarded a €300,000 tender contract to a company owned by his brother, and Rugova himself signed the contract.⁵⁰ In June 2021, he received a one-year prison sentence.⁵¹

Common challenges

The data on directories of public officials is publicly available in North Macedonia, Serbia and Türkiye.⁵² However, in the latter, the data is not complete.

Like the other datasets, the **formats** in which the public officials' data is published are not user-friendly. In all three countries, the data is available in digital text format. The data is available in html format in North Macedonia and Serbia. In both countries, it includes the education level and position that a public official occupies, as well as the dates of assuming the role. In the case of Türkiye, the information about public officials is only available in the form of officials' biographies on the websites of relevant institutions, hence it is scattered across many websites.

With regards to **interoperability**, unique identifiers are not used in any of the three cases, which means that matching this data with other relevant datasets, such as company registers and public procurement, is not possible. Specifically, without unique identifiers for institutions in which public officials are employed, it is not possible to match directories of public officials with public procurement datasets in order to see, for example, whether firms with ties to public officials get public procurement contracts with institutions employing those public officials.

LOBBYING REGISTERS/MEETINGS

Transparency International defines lobbying as “any direct or indirect communication with public officials, political decision makers or representatives for the purposes of influencing public decision-making, and carried out by or on behalf of any organised group.”⁵³ As such, lobbying is an essential part of a democratic process, but challenges may arise with unequal access to decision makers, where vested interests may obtain disproportionate influence in shaping policy agendas at the expense of public interest.⁵⁴ Big business actors can also exploit loopholes in lobbying legislation by hiding behind front groups,⁵⁵ while weak lobbying legislation can open up the space for political corruption.⁵⁶

Considering these risks, it is important to provide a transparent picture of the impact of lobbying on decision-making. Among other policies, disclosure of meetings held by public officials and a lobby register that would include information on lobbyists, including contacts with officials, financial expenditures, actors involved and types of interests advocated for, would help both citizens and policy makers to have a clearer overview of the effects and the nature of lobbying.⁵⁷ To be informative and analytically useful, it is important that a lobbying register is based on a broad definition of lobbying and mandatory for all actors.⁵⁸

When made interoperable with other datasets, such as political finance, it is possible to get insights into the relationship between political donations and outcomes of policies that were lobbied by or on behalf of donor companies.

Relevance for the Western Balkans and Türkiye

Informal ties between politics and business operating through patronage networks remain persistent in the Western Balkans and Türkiye.⁵⁹ Well-defined lobbying rules can shed light on those ties. Currently, only North Macedonia and Serbia have specific legislation on lobbying out of all the countries analysed in this study. For example, Kosovo still does not have a law on lobbying, and there is no initiative from either the government or the Assembly to draft the law.⁶⁰

In Serbia, the Law on Lobbying stipulates too narrowly that lobbying commences with a written notice from lobbyists to the individuals being lobbied. This implies that any other form of contact falls outside the purview of this legislation.⁶¹ This restriction is reflected in the limited number of officially reported lobbying interactions over the years. For instance, Transparency Serbia undertook research into the law's implementation during the initial five months. They sent 23 inquiries to institutions that were anticipated to be prime candidates for lobbying activities and received 23 uniform responses indicating that no lobbying contacts aligned with the law's definition of lobbying had occurred.⁶² Within the four years of implementation, a mere seven contacts were reported to the Agency for Prevention of Corruption (ACAS).⁶³ An additional challenge is that the records kept by the state authorities on lobbying contacts are not publicly accessible, nor are the annual reports of registered lobbyists to ACAS on contact details and subjects discussed.⁶⁴

This example underscores the significance of a legislative framework in establishing comprehensive lobbying registers that accurately depict the total extent of lobbying activities.

Common challenges

Lobbying registers are publicly accessible in North Macedonia and Serbia, but the data itself is of poor quality, making these datasets some of the worst performing of all that were assessed in this study.

In North Macedonia, there were no registered lobbyists at the time of writing this study. Hence, although the database is available on the website of the State Commission for Prevention of Corruption, it remains empty.

In Serbia, the register of lobbyists is maintained on the website of the Agency for Prevention of Corruption. Although the dataset contains information on registered lobbyists, there is no record of their meetings. Nevertheless, the larger issue concerning this dataset pertains to the legislative framework governing lobbying,⁶⁵ which adopts a very narrow definition of lobbying. Consequently, even if the dataset incorporated all information regarding lobbying meetings conducted by registered lobbyists, its value would be limited as the number of official contacts is insignificant.⁶⁶

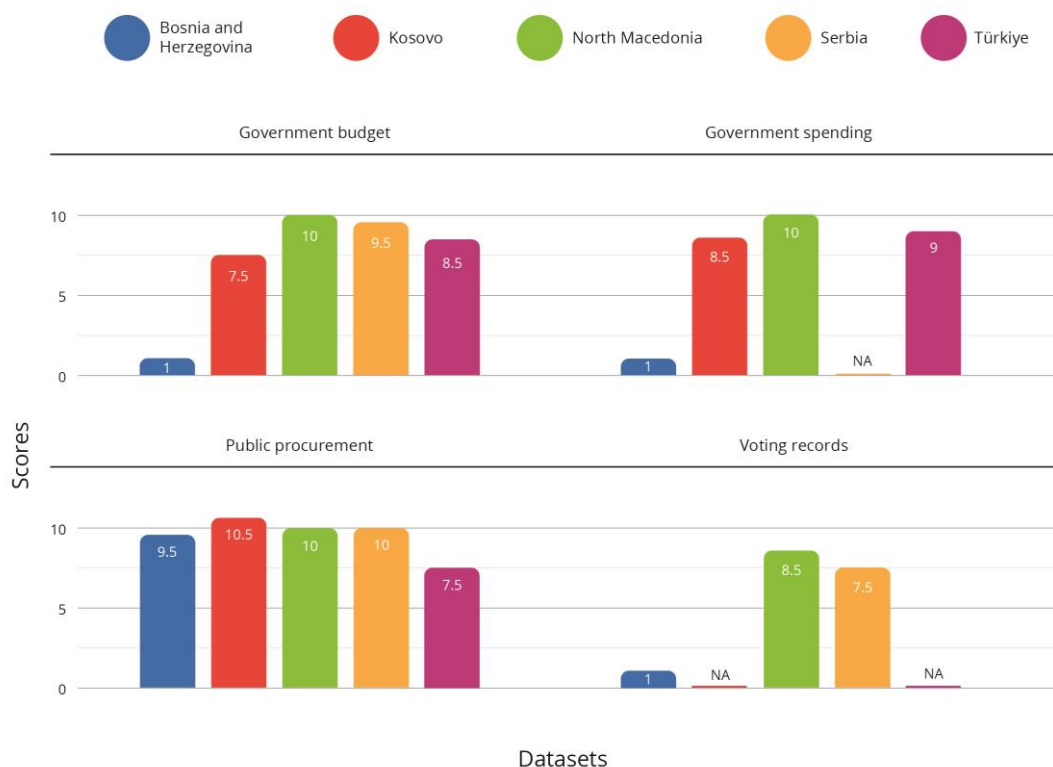
These datasets are published in **data formats** that do not enable bulk downloads, as in both North Macedonia and Serbia, the datasets are in html formats.

POLICY OUTPUT DATA IN THE WESTERN BALKANS AND TÜRKIYE

Policy output data refers to information depicting the outcome of policy processes, such as law-making decisions, budget and spending data and public expenditures through public procurement. Within this study, the following policy output datasets were assessed:

- + government budget
- + government spending
- + public procurement
- + voting records

FIGURE 3. POLICY OUTPUT DATA IN THE WESTERN BALKANS AND TÜRKIYE



Note: The scores range from 0 (lowest) to 12.5 (highest). Missing bars indicate that a dataset does not exist in that country or that it was not assessed within this study. For a detailed methodology description, please refer to the Annex: Assessment questionnaire.

GOVERNMENT BUDGET AND GOVERNMENT SPENDING

Government budgets provide information on the national budget by sector, department and other units, while spending data provides insights into spending at the transactional level. Both of these datasets, depending on their quality, reflect the government's commitment to transparency, manifesting in providing public access to disaggregated data on how it allocates the budget as well as how it spends it.

Considering that public spending is vulnerable not only to waste, but also to deliberate misuse and fraud⁶⁷ to benefit specific interest groups, the transparency of government budget and spending data aids in upholding the political integrity of political officeholders. Additionally, transparent government budget and spending data enables citizens to assess whether public funds are managed in the public interest.⁶⁸

Relevance for the Western Balkans and Türkiye

High corruption risks in the allocation of public funds, as evidenced in the region,⁶⁹ suggest that having transparent government budget and spending is essential as one of the safeguards against corruption. In Serbia, for example, the State Audit Institution's (DRI) reports over the years have shown that part of public money is spent irregularly.⁷⁰ In Kosovo, there is evidence of wasteful spending in infrastructure projects, such as the motorway project connecting Kosovo and North Macedonia. In relation to this project, former Minister of Infrastructure Pal Lekaj, along with two other officials, was indicted in 2022 for the questionable €53 million penalty fee that the government paid to the construction consortium Bechtel-Enka due to delays in government payments.⁷¹ A common challenge for the Western Balkans is that public-private partnership (PPP) projects' related costs are not included in the budget documents.⁷²

Common challenges

Government budget datasets are available and published on a timely basis in Kosovo, North Macedonia, Serbia and Türkiye, while government spending data is publicly accessible in Kosovo, North Macedonia and Türkiye.

With regards to **data formats**, only North Macedonia provides the government budget dataset in machine-readable format via csv files that are available for download. In the case of Kosovo, Serbia and Türkiye, the budget is available in the form of searchable PDF files. When it comes to government spending, machine-readable files are available in North Macedonia (csv format) and Türkiye (xls format), while Kosovo provides data in the form of searchable PDF files.

Government budget data in all cases utilises some common operators, such as budget and project codes, economic classifications identifying the type of expenditure, and unique codes for recipients of budget funds. However, these common operators can only be utilised for matching with government spending data.

With regards to the **interoperability** of government spending data, North Macedonia is a positive example, as it includes unique tax numbers for both recipients and issuers, enabling potential matching with other relevant databases.

Like other datasets, government budget and spending datasets in the Western Balkans and Türkiye do not have proper **metadata and documentation**.

PUBLIC PROCUREMENT

Rich academic and policy literature, along with numerous journalistic investigations in and beyond the Western Balkans and Türkiye, have found evidence of political favouritism, lack of competition and failure to achieve value for money in public procurement contracting.⁷³ Hence, making this data available to public scrutiny throughout all procurement stages, from the publishing of bids through the awarding of contracts to potential contract amendments, is essential to minimise corruption risks in public spending. When made interoperable with other datasets, such as asset and interest declarations and business registers, public procurement data is a powerful tool to detect conflicts of interest and other breaches of political integrity.

Relevance for the Western Balkans and Türkiye

Numerous cases of corruption demonstrate the strong influence of patronage networks in the process of allocating public procurement contracts in the Western Balkans and Türkiye. Procurement procedures are often characterised by high corruption risks, manifesting in low competition levels and tailored specifications, as several examples in Box 3 indicate.

Box 3. Corruption risks in public procurement in the Western Balkans and Türkiye

In Bosnia and Herzegovina, research shows that public procurements generally lack transparency, and that abuse of rules typically manifests in formulating technical specifications that are tailored to specific companies.⁷⁴ Competition levels are low, as the data of the Public Procurement Agency (PPA) suggest that there are 1.7 bidders per procedure, on average.⁷⁵ The latest Support for Improvement in Governance and Management (SIGMA)⁷⁶ monitoring report for Bosnia and Herzegovina highlights several challenges concerning public procurement contract management. Notably, there is no evidence of systematic ex post evaluation of the procurement process.⁷⁷ Moreover, issues persist with contract implementation, and the PPA lacks data on the number and value of modified contracts in the post-award stage.⁷⁸ The absence of information on contract implementation on central public procurement portals increases corruption risks, considering that bidders lack the necessary information to flag potential contract violations.⁷⁹

In North Macedonia, the Special Prosecution Office launched an investigation in 2017 in relation to the public procurement of a luxury car under the codename Tenk.⁸⁰ A court in Skopje found that the former Prime Minister Nikola Gruevski instructed two officials in the procurement of Mercedes Benz vehicle in 2012 with an aim to favour a particular supplier.⁸¹

In Türkiye, President Erdogan's closest business allies, known as "the gang of five", receive the vast majority of government tenders.⁸² Research on public procurement in Türkiye has shown that politically connected companies enjoy higher contract prices and a high level of government discretion compared to non-connected firms.

Common challenges

Public procurement datasets are, with the exception of Türkiye, the best-performing of all the datasets analysed within this study. These datasets are available online, published in a timely manner, and available in machine-readable formats in three out of five cases. In Kosovo, access to the database is available through API, making it the only dataset assessed in this study available in that format. However, the public procurement datasets have other important shortcomings.

With regards to **data formats**, these datasets are available in machine-readable formats in Kosovo (via API), and in North Macedonia and Serbia⁸³ (through machine-readable files), while in Bosnia and Herzegovina and Türkiye, they are available in digital text formats. However, most of the datasets do not contain key variables essential for developing corruption risk indicators. For example, the information in the Serbian public procurement datasets which can be directly downloaded is limited. The information that is crucial to develop risk indicators of public procurement contracts, such as the number of bidders, final price, announcement and submission dates, unique identification numbers of issuing institutions and winner firms, and decision period, are only available on a case-by-case basis by clicking either on the folders with individual documentation for each case or on individual PDFs. This information cannot be directly downloaded and requires scraping in order to collect it in a database.

In this regard, North Macedonia is comparatively positive example, as its dataset on awarded contracts provides machine-readable csv files rich with some of the key variables that can be used to develop risk indicators, such as estimated and final price, highest and lowest offers and number of bidders.

With regards to **interoperability**, these datasets do not contain information on identification numbers of winning firms,⁸⁴ which would be essential for making them interoperable with other key datasets, such as asset and interest declarations, political finance and company registers. Hence, the value of these datasets as tools to detect political corruption, despite their availability in machine-readable formats in the majority of cases, is limited.

The public procurement datasets are typically **accessible** in all analysed cases, although the access to the tender documentation for individual contracts requires a free of charge registration.

Similar to the other datasets, all public procurement datasets lack appropriate **metadata and documentation**.

Box 4. Awarded concessions for exploration of mineral goods in North Macedonia

Within this study, one additional dataset, relevant for the topic of allocation of public resources, was assessed. This dataset provides information on concessions awarded for exploration of mineral goods, and it is particularly relevant from the perspective of political integrity, considering the high corruption risks identified in relation to concessions for renewable energy-related projects in the region.⁸⁵

This dataset is accessible in machine-readable format as an xlsx file available for download. However, the dataset suffers from similar shortcomings as other datasets assessed in this study.

While it includes unique identification numbers of firms, this information is missing in a lot of cases, which hinders the ability to match this dataset with other relevant databases. Moreover, there is a lot of missing data in other fields as well, such as the dates of signing the concession contract as well as the address and tax number of concessionaires.

Finally, the dataset is not updated in a timely manner.

VOTING RECORDS

Voting records ideally include details of the session, chamber, and the type of legislation (amendment, new bill, etc.) as well as the voting decisions of each legislator. Transparent voting records of parliamentarians encourage accountability of legislators for the decisions they make and serve as a tool to detect potential conflicts of interest.⁸⁶ For example, when made interoperable with other datasets, such as assets and interest declarations and lobbying, voting records can help identify suspicious ties between political officeholders and interest groups.⁸⁷

Relevance for the Western Balkans and Türkiye

Considering different forms of undue influence on law-making, transparent and open data on voting records would serve as an important tool to hold political officials accountable. A recent study on Kosovo has identified laws that enable certain businesses to hold monopoly positions or avoid checks and balances.⁸⁸ A study on North Macedonia has indicated that tailor-made laws have three typical purposes, including establishing control over an industry or a sector, achieving impunity for corruption and avoiding checks and balances.⁸⁹ For example, amendments to the criminal code of 2018 in North Macedonia lowered the sentence for misuse of public procurement.⁹⁰

Common challenges

Despite the importance of having open and transparent voting records in the Western Balkans and Türkiye, this is one of the worst performing datasets in the region. Voting records are publicly available only in North Macedonia and Serbia. In Kosovo's Assembly, voting has been conducted by a show of hands for over two and half years, due to the failure to complete a tender procedure to reinstate electronic voting.⁹¹ This has drawn criticism from the civil society sector.

With regards to **data formats**, while voting records are available in the digital text format in both North Macedonia and Serbia, the information is available only in the form of searchable PDF files on a case-by-case basis in Serbia. These files include information on how each Member of Parliament voted as well as their party affiliation.

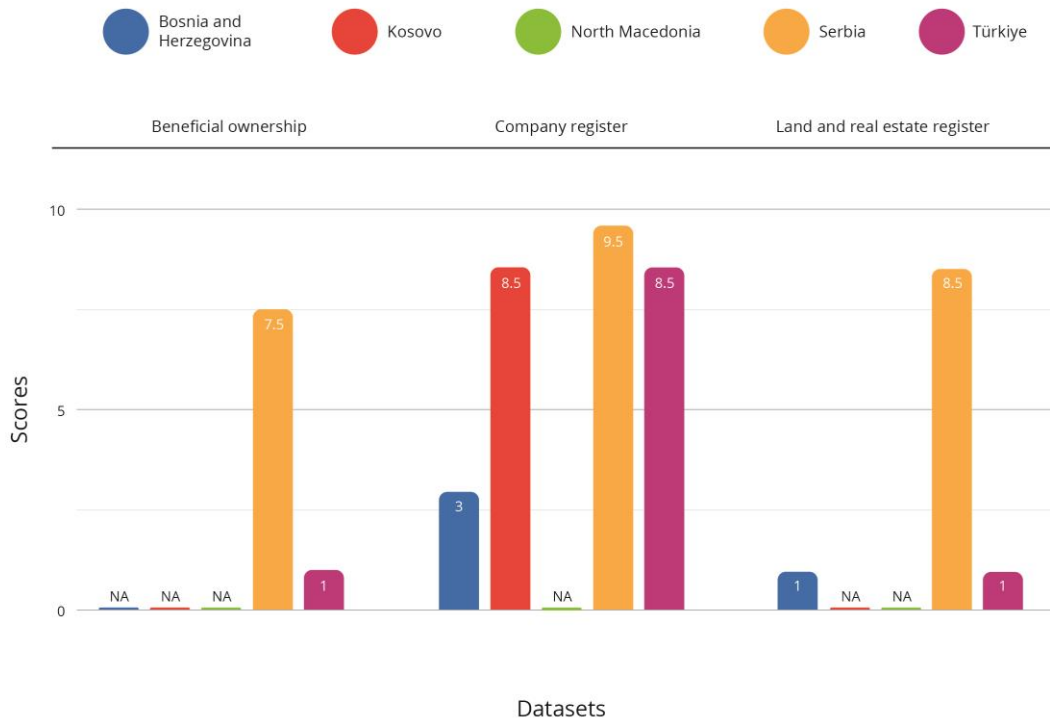
While voting records are published in a **timely** manner in both North Macedonia and Serbia, they cannot be made **interoperable** with other datasets, as they have no unique identifiers for Members of Parliament nor for political parties.

PRIVATE SECTOR DATA IN THE WESTERN BALKANS AND TÜRKIYE

Private sector data refers to information on companies, their revenues, management structures, ownership, financial and tax data, etc. Within this study, the following private sector data was assessed:

- + beneficial ownership registers
- + company registers
- + land and real estate registry

FIGURE 4. PRIVATE SECTOR DATA IN THE WESTERN BALKANS AND TÜRKIYE



Note: The scores range from 0 (lowest) to 12.5 (highest). Missing bars indicate that a dataset does not exist in that country or that it was not assessed within this study. For a detailed methodology description, please refer to the Annex: Assessment questionnaire.

BENEFICIAL OWNERSHIP

Beneficial ownership registers contain information on the ultimate owners of an entity (company or trust fund), i.e. the natural persons who own, control or benefit from that entity.⁹² Large leaks of documents, such as the Panama and Pandora papers,⁹³ unveiled the degree to which top-level politicians, business figures and organised crime groups exploit offshore heavens to hide wealth, launder money derived from illicit activities, and evade paying taxes at the expense of public interest.⁹⁴ Consequently, in recent years, efforts have been directed towards establishing national beneficial ownership registers. At the same time, there have been collaborations between networks of the non-profit sector, industry and government aimed at publishing openly accessible beneficial ownership datasets.⁹⁵

Considering that grand corruption cases in many instances rely on the use of shell companies, having open, timely and freely accessible national central registers of beneficial owners would provide more effective national and international investigations⁹⁶ as well as facilitate the exchange of information between relevant institutions both within and between countries.

Moreover, beneficial ownership registers can help in detecting and preventing illicit use of corporate entities for political corruption, bribery and tax evasion. These registers can also be utilised to map out the relationship between the key political and business actors in a country, for example, by interconnecting them with political financing and public procurement datasets.

Relevance for the Western Balkans and Türkiye

Political officeholders and businesspeople in the Western Balkans and Türkiye have also made use of offshore companies for their business activities, as shown in Box 5.

Box 5. Doing business with offshore companies in the Western Balkans and Türkiye

In Bosnia and Herzegovina, the former director of a company called Bosnalijek was accused of extracting money from the company through his offshore firms over two time periods. According to the Prosecution of Bosnia and Herzegovina, he extracted resources while being the director of the representation of Bosnalijek in Moscow between 2005 and 2012 while the firm was in the majority ownership of the federal government.⁹⁷ He allegedly did so via fake consultancy contracts with his own offshore firms.⁹⁸

In Serbia, investigation of the Crime and Corruption Reporting Network (KRIK) and the Organized Crime and Corruption Reporting Project (OCCRP) revealed that the current Serbian Finance Minister, Siniša Mali, as a representative of two offshore firms based in British Virgin Islands, bought 23 luxury apartments in Bulgaria during 2012 and 2013. Mali later claimed that his signatures on the documents were forged. In 2009, Mali received over half a million euros from an offshore company “Alessio Investment” registered in British Virgin Islands.⁹⁹ The money was transferred a Swiss bank account and was allegedly paid for the purchase of the company “Ferd Genetics”, which Mali sold to “Alessio Investment”.¹⁰⁰ The investigative journalists revealed, however, that Mali was the director of “Alessio Investment”. The origin of the money was never uncovered.¹⁰¹

In Türkiye, the leaks of the Panama, Pandora and Paradise papers helped reveal a network of politically connected billionaires who relied on offshore companies to siphon resources out of Türkiye. One example is the network of offshore companies in Switzerland and the British Virgin Islands tied to the billionaire Erman Ilıcak.¹⁰²

The privatisation process in the region was and is especially vulnerable to these practices. Firms with hidden ownership, political connections and sometimes links to organised crime groups are known to buy companies designated for privatisation.¹⁰³

Common challenges

Transparency International’s chapters assessed beneficial ownership registers in Bosnia and Herzegovina, Serbia and Türkiye. This register is publicly accessible only in Serbia on the website of the Business Registers Agency (APR).

While the database is regularly updated and available in a disaggregated form for each individual company, it suffers from at least two major shortcomings. First, it requires mandatory registration to be able to access any data. Second, it is possible to search by unique identification numbers of firms, but users can only search one firm at the time. Hence, it is not possible to download information in bulk, and even web scraping the data would be a technically challenging task.

COMPANY REGISTERS

Company registers contain information about every legally registered company within a jurisdiction and typically include information on dates when companies were formed, whether they are still active, changes of directors and management boards, and financial performance data. As such, company registers are one of the most essential databases for detecting and preventing breaches of political integrity. When matched with datasets on political finance, lobbying and public procurement, for example, they can provide insights into questions about potentially opaque political finance and politicised allocation of public resources, such as:

- + the difference in corruption risks in awarded public procurement contracts between politically connected and non-connected firms
- + changes in business fortunes of firms due to establishing political connections
- + changes in business fortunes (e.g. number of awarded public procurement contracts) of firms after donating to political parties, etc.

Relevance for the Western Balkans and Türkiye

Having open and transparent company registers in the Western Balkans and Türkiye is essential to be able to detect political corruption, considering the politicised nature of their economies, allocation of resources and widespread state capture. Political parties in the region act as key captors of institutions and key drivers in the process of redirecting public resources into the pockets of politically connected actors.¹⁰⁴

Box 6. Politically connected companies across Western Balkans and Türkiye

In Bosnia and Herzegovina, one database created by the Center for Investigative Journalism (CIN) showed that firms owned by politicians or their family members largely benefit from public procurement contracts.¹⁰⁵ One recent case involves a private firm owned by the current Human Rights and Refugees Minister Sevlid Hurtić, which won over 1.4 million KM (approximately €716,000) in two tenders.¹⁰⁶ Transparency International Bosnia and Herzegovina filed a report about this case to the Commission on deciding over conflicts of interests of Bosnia and Herzegovina, citing violations of the law on conflict of interest in governmental institutions in Bosnia and Herzegovina.¹⁰⁷

In Kosovo, evidence suggests that the interests of top-level politicians, political parties and businesses captured the regulation of gravel extraction.¹⁰⁸ Reports suggest that gravel quarrying companies are largely owned by actors with strong political ties. In 2013, it was revealed that the brother of the former Prime Minister had ties with a company registered for producing gravel which had managed to secure important clients.¹⁰⁹

In North Macedonia, legislation for the environmental sector, such as regulation no. 29¹¹⁰ introducing support for producers using renewable energy in the form of feed-in tariffs and premiums, was particularly beneficial for hydropower producers, some of which were politically connected.¹¹¹

In Serbia, politically connected private arms traders accumulated huge profits while state-owned arms factories suffered financially.¹¹²

In Türkiye, procurement data between 2004 and 2011 suggests that two-thirds of public procurement contracts allocated by five state-owned enterprises in the energy sector went to politically connected firms.¹¹³

Common challenges

Transparency International's chapters assessed company register data in Bosnia and Herzegovina, Kosovo, Serbia and Türkiye. Company registers in Bosnia and Herzegovina,¹¹⁴ Kosovo, Serbia and Türkiye¹¹⁵ are publicly available, timely and make use of common identifiers,¹¹⁶ such as unique identification numbers for firms. However, they have several important shortcomings.

These data are published in **formats** that are not appropriate for immediate analysis, as in all cases the information is provided in digital text formats. Specifically, in the case of Kosovo, the data is available in html format, while Serbia and Türkiye have adopted a hybrid form, combining html, Word, and PDF formats in the former case, and html and PDF formats in the latter. In the Serbian case, the basic firm data, such as date of registration, identification number, and bank account numbers, are available in html format, while changes of directors and management boards as well as financial reports are available as Word and PDF documents, respectively. Hence, any big data analysis would require web scraping and significant technical planning.

A related issue refers to searching for information. In the Serbian case, firms can only be searched on a case-by-case basis by entering either their unique identification number or their name.¹¹⁷ Kosovo's register is slightly better in this respect, as it enables searching by industry sector, which in theory would make web scraping slightly less cumbersome. The Turkish register allows for filtering by location and searching by trade industry number or name.

With regards to **accessibility**, while the datasets in Serbia and Kosovo can be accessed without registration, the Turkish register can only be accessed after prior registration.

LAND AND REAL ESTATE REGISTERS

Land and real estate registers include national-level information on land and real estate ownership, tenure and location, and this data is typically maintained by a land registration agency or national cadastre. The Russian war in Ukraine has brought to the fore the magnitude of challenges related to financial secrecy, manifesting in difficulties to identify and freeze assets of oligarchs linked to Vladimir Putin.¹¹⁸ These challenges go far beyond tracking the wealth of several oligarchs, as wealth secrecy is a global issue that facilitates financial opacity.¹¹⁹ Therefore, having publicly accessible data on land and real estate registers is one important element in detecting political corruption and helping to track dirty money flows.

Relevance for the Western Balkans and Türkiye

Corruption risks in relation to the land and real estate registers are a challenging issue in the Western Balkans and Türkiye as well. In Serbia, there were multiple allegations over the last several years on alleged corrupt practices in Republic Geodetic Authority, the institution that maintains the land register.¹²⁰ In Kosovo, multiple allegations of corruption practices have emerged with regards to expropriation and privatisation processes of land and property.¹²¹ Within Kosovo's current regulatory framework, the shared responsibility for property management among different levels of governments presents significant challenges in combating corruption related to land and property. In North Macedonia in 2015, financial police arrested 19 people, including employees of the Agency for Real Estate Cadastre (AREC), the owner of a private surveying company and individuals who illegally acquired real estate property.¹²²

Common challenges

The land and real estate register is one of the worst performing datasets analysed in this study. It was assessed in Bosnia and Herzegovina,¹²³ Serbia and Türkiye, and it is publicly accessible only in Serbia.

The Serbian register is updated in a timely manner and there is detailed information about each parcel. However, the data is in digital text format, meaning that it is not possible to download the data in bulk. Moreover, the dataset does not make use of common identifiers, which makes this dataset impossible to match with other databases analysed in this study.

RECOMMENDATIONS

In order for watchdogs from civil society, media and government to be able to detect risks of political corruption using publicly available information, data holders must:

General

- + Publish datasets in machine-readable formats based on International Open Data Charter principles, thereby enhancing their accessibility to a wider audience, including civil society organisations, media and citizens. Given the specific corruption risks identified in the Western Balkans and Türkiye, such as the concealment of wealth by public officials and conflicts of interests, it is especially crucial to provide machine-readable formats for datasets pertaining to assets and interests of public officials, political finance, and company and beneficial ownership registers.
- + Enhance dataset interoperability by ensuring that key variables contain unique identifiers. Given the high corruption risks associated with the allocation of public funds in the region, it is essential, at a minimum, to include unique identifiers of firms, state institutions and public officials in the relevant datasets. These improvements would facilitate automating the match of company and beneficial ownership registers to other information, such as public procurement, political finance, and assets and interests of public officials. This would have practical relevance as well by enabling law enforcement agencies to collaborate and automate the exchange of information.

Assets and interests of public officials

- + Information on assets and interests of public officials should be made available in machine-readable formats in all countries analysed in this study.
- + Regulators should ensure that declarations of assets and interests are made publicly available in a timely manner and at regular intervals following changes in the content.
- + Declarations of assets and interests should incorporate unique identifiers for public officials and any type of legal entity where they hold beneficial ownership.

Directories of public officials

- + Considering the widespread issues with compliance with integrity systems in the region, it is essential to provide unique identifiers of public officials and institutions in which they are employed to facilitate matching of this information with other datasets, such as public procurement.
- + Directories of public officials should be made available in a centralised manner and in machine-readable formats.

Lobbying registers and meetings

- + Lobbying registers should be based on a broad definition of direct and indirect lobbying, encompassing all organised groups that seek to influence the decision-making process. This is essential for these registers to function as effective tools for detecting political corruption. The evidence presented in this study underscores that an overly narrow definition of lobbying results in datasets that provide minimal useful information for holding public officials accountable.
- + Lobbying registers should be publicly accessible in machine-readable formats and include information on at least the identity of lobbyists, the interests that they represent, the sources of funding of lobbying activities, and any political contributions to political parties or candidates in cash or in kind.
- + Individual lobbyists, lobbying firms, political parties and candidates should have unique identifiers to facilitate the matching of lobbying registers with other information.

Political finance

- + Regulators must update reporting rules to make it compulsory for candidates and third parties to also report their income and expenditures.
- + Reporting and disclosure of political finance information must include itemised financial reports for campaign expenditures and donations.
- + Political finance information should include unique identifiers for political parties, candidates, third parties, individual donors and donor firms to facilitate matching with other political integrity information.
- + All financial reports should be properly itemised by an adequate classification of assets, income, liabilities and expenditures.
- + Political finance and campaign expenditure reports should be made available in machine-readable formats.

Policy output data

- + With a few notable exceptions outlined in this study, public procurement datasets, in particular, should improve content by incorporating additional information to facilitate the development of corruption risk indicators. This may encompass details such as the number of bidders, the final price, announcement and submission dates, as well as unique identification numbers for issuing entities and winning firms.

Private sector data

- + Considering the relevance of company and beneficial ownership registers in detecting political corruption, regulators and data holders in the region need to make urgent efforts to make these registers publicly available and regularly updated in machine-readable formats.

GLOSSARY

Based on Transparency International's Anti-Corruption Glossary.¹²⁴

Beneficial ownership secrecy: A beneficial owner is the real person who ultimately owns, controls or benefits from a company or trust fund and the income it generates. The term is used in contrast with the legal or nominee company owners and trustees, all of whom might be registered the legal owners of an asset without actually possessing the right to enjoy its benefits. Complex and opaque corporate structures set up across different jurisdictions make it easy to hide the beneficial owner, especially when nominees are used in their place and part of the structure is in a secret jurisdiction.

Conflict of interest: Situation where an individual, or the entity for which they work, whether a government, business, media outlet or civil society organisation, is confronted with choosing between the duties and demands of their position and their own private interests.

Grand corruption: The abuse of high-level power that benefits the few at the expense of the many, and causes serious and widespread harm to individuals and society. It often goes unpunished. See also 'corruption', 'petty corruption', and 'political corruption'.

Lobbying: Any activity carried out to influence a government or institution's policies and decisions in favour of a specific cause or outcome. Even when allowed by law, these acts can become distortive if disproportionate levels of influence exist by companies, associations, organisations and individuals.

Offshore financial centres: Countries or jurisdictions, sometimes called 'fiscal paradises' or 'tax havens', provide financial services to non-residents on a disproportionate scale to the domestic economy as a result of financial incentives, such as minimum government interference and very low or zero tax rates.

Open data:¹²⁵ Open data is digital data that is made available with the technical and legal characteristics necessary for it to be freely used, reused, and redistributed by anyone, anytime, anywhere.

Political corruption: Manipulation of policies, institutions and rules of procedure in the allocation of resources and financing by political decision makers who abuse their position to sustain their power, status and wealth. See 'corruption', 'grand corruption', and 'petty corruption.'

Political integrity:¹²⁶ Exercising political power consistently in the public interest, independent from private interests and not using power to maintain the office holder's own wealth and position.

Procurement: A multi-step process of established procedures to acquire goods and services by any individual, company or organisation, from the initial needs assessment to the contract's award and service delivery.

ANNEX

Assessment questionnaire

For each of the data questions below the researchers will need to respond with respect to each of the selected key data sources. The researchers are expected to provide a simple YES/NO answer, and additional references required as evidence. A final score will result of the aggregated values for each of the questions.

- + Each 'Y' value is equal to 1.
- + Each 'N' value is equal to 0.

The exception to the above is question D-Formats.

D-Exist Does this information exist in any form, even if not publicly accessible? YES/NO/NO EVIDENCE (Please describe the evidence and if applicable include links that may point to the existence of the data.) If the answer to this question is 'NO' for any of the datasets evaluated then you don't need to continue with the rest of the 'D-' questions for that dataset, given that they won't be applicable

D-Data Is this data available online in any form? YES/NO (Include links to the available data as evidence.) If the answer to this question is 'NO' for any of the datasets evaluated then you don't need to continue with the rest of the 'D-' questions for that dataset, given that they won't be applicable

D-Timeliness Are the available datasets timely and updated? YES/NO (Include last update date and update frequency as evidence.)

D-Completeness Does the dataset include all units/items/subjects that are required to be reported? (For example, in the case of assets and interests of officials, does the dataset include all the relevant officials, or are there missing ones.) YES/NO (If no, describe the extent of the missingness and provide any key examples. Very often this will be impossible to assess without in-depth research, so this question will be treated as a pilot).

D-Granularity Does the government release datasets at the finest level of granularity available without data aggregations? YES/NO (Describe any existing aggregation as evidence.) For example government spending can be reported at its most granular at the level of each invoice paid or aggregated by spending category or institution.

D-Formats Does the government release datasets in machine-readable and reusable formats? YES/NO If YES, is it through: a) a machine-readable file or b) APIs. If NO, is it a) image/hand-written text or b) digital text? (Include the list of all available formats as evidence.) Some examples of machine-readable and reusable formats are: csv, xls, xlsx, ods, xml, shp, px and json. The scoring for this question is as follows: YES(a) = 1; YES(b) = 1.5; NO(a) = 0; NO(b) = 0.5.

D-Openness Does the government release open data that is free of charge and under an open and unrestricted licence? YES/NO (Include references to any applicable charging policy and licence as evidence.) An open licence must clearly state that anyone has permission to reuse it and does not restrict what the data can be reused for, more than attribution and share-alike. Refer to the Open Definition and the list of conformant licences for a detailed overview of what counts as an open licence.

D-Accessibility Does the government release the datasets without mandatory registration? YES/NO (Include links to any required registration process as evidence.)

D-Interoperability Does the government make use of common identifiers when collecting and publishing data? YES/NO (Include references to any implemented standard as evidence. If Yes, please provide information on whether these common identifiers are shared with other key datasets.)

D-Metadata Does the government ensure that the datasets include consistent core metadata including at least a descriptive title, data source, publication date and available formats? YES/NO (Include links to any existing metadata descriptions as evidence.)

D-Documentation Does the government provide clear accompanying documentation for the published datasets with sufficient information to understand the source(s) and analytical limitations of the data? YES/NO (Include links to any accompanying documentation as evidence.)

D-Extent Is the dataset available at the national level? YES/NO. (If NO, please include in notes the geographic area covered).

Assessment of political integrity datasets in the Western Balkans and Türkiye

Tables A1-A13 display average scores for each assessed dataset, provided that a dataset received at least a summed score of 1. The score is the average of all 12 indicators and ranges from a minimum of 0 to a maximum of 1.04 (12.5/12=1.04). For clarification regarding the case of Bosnia and Herzegovina, please refer to endnote number 5.

Table A1. Average score for Assets and interests of public officials' dataset in the Western Balkans and Türkiye.

Assets and interests of public officials	Score (0 lowest – 1.04 highest)
Bosnia and Herzegovina	0.71
Kosovo	0.71
North Macedonia	0.71
Serbia	0.62
Türkiye	0.08

Table A2. Average score for Beneficial ownership dataset in the Western Balkans and Türkiye.

Beneficial ownership	Score (0 lowest – 1.04 highest)
Serbia	0.62
Türkiye	0.08

Table A3. Average score for Company register dataset in the Western Balkans and Türkiye.

Company register	Score (0 lowest – 1.04 highest)
Serbia	0.79
Kosovo	0.71
Türkiye	0.71
Bosnia and Herzegovina	0.25

Table A4. Average score for Directories of public officials' dataset in the Western Balkans and Türkiye.

Directories of public officials	Score (0 lowest – 1.04 highest)
Serbia	0.71
North Macedonia	0.62
Türkiye	0.54
Bosnia and Herzegovina	0.08
Kosovo	0.08

Table A5. Average score for Government budget dataset in the Western Balkans and Türkiye.

Government budget	Score (0 lowest – 1.04 highest)
North Macedonia	0.83
Serbia	0.79
Türkiye	0.71
Kosovo	0.62
Bosnia and Herzegovina	0.08

Table A6. Average score for Government spending dataset in the Western Balkans and Türkiye.

Government spending	Score (0 lowest – 1.04 highest)
North Macedonia	0.83
Türkiye	0.75
Kosovo	0.71
Bosnia and Herzegovina	0.08

Table A7. Average score for Lobbying register/meetings dataset in the Western Balkans and Türkiye.

Lobbying register/meetings	Score (0 lowest – 1.04 highest)
Serbia	0.54
North Macedonia	0.46

Table A8. Average score for Political financing dataset in the Western Balkans and Türkiye.

Political financing	Score (0 lowest – 1.04 highest)
Serbia	0.79
Bosnia and Herzegovina	0.71
Kosovo	0.67
North Macedonia	0.5
Türkiye	0.46

Table A9. Average score for Public procurement dataset in the Western Balkans and Türkiye.

Public procurement	Score (0 lowest – 1.04 highest)
Kosovo	0.88
North Macedonia	0.83
Serbia	0.83
Bosnia and Herzegovina	0.79
Türkiye	0.62

Table A10. Average score for Land and real estate register dataset in the Western Balkans and Türkiye.

Land and real estate register	Score (0 lowest – 1.04 highest)
Serbia	0.71
Bosnia and Herzegovina	0.08
Türkiye	0.08

Table A11. Average score for Voting records dataset in the Western Balkans and Türkiye

Voting records	Score (0 lowest – 1.04 highest)
North Macedonia	0.71
Serbia	0.62
Bosnia and Herzegovina	0.08

Table A12. Average score for Awarded concessions for exploration of mineral goods dataset in North Macedonia.

Awarded concessions for exploration of mineral goods	Score (0 lowest – 1.04 highest)
North Macedonia	0.58

Table A13. Average score for Public procurement, privatisation and other procedures dataset in Serbia.

Public procurement, privatisation and other procedures	Score (0 lowest – 1.04 highest)
Serbia	0.71

ENDNOTES

¹ Transparency International. 2020. [Political integrity](#).

² Transparency International. 2020. [Political integrity](#).

³ Nieves Zúñiga, Examining State Capture: Undue Influence on Law-Making and the Judiciary in the Western Balkans and Türkiye, Transparency International, 2020; Slagjana Taseva, [Grand Corruption and Tailor-Made Laws in Republic of North Macedonia](#), Transparency International Macedonia, 2020.

⁴ The number refers to datasets assessed in more than one case. Overall, there are 13 unique datasets.

⁵ Contains the list of datasets assessed by at least one Transparency International chapter. Additionally, a dataset is included in the table if a chapter checked for its availability and determined that it does not exist in the country in question.

⁶ Due to the specificities of Bosnia and Herzegovina's governance system, separate datasets with varying quality and availability exist for different levels of government in the cases of the company register, directories of public officials, government budget and spending, voting records and land and real estate register. Consequently, it was not possible to provide uniform responses for the majority of indicators related to these datasets in the case of Bosnia and Herzegovina. Specifically, the datasets on the directories of public officials, government budget and spending, voting records and land and real estate registry could only be evaluated on the first indicator, "D-exist", while the company register was assessed on three indicators, namely "D-exist", "D-datasets", and "D-Timeliness". For a detailed overview of each indicator, please refer to the Annex: Assessment questionnaire.

⁷ International Open Data Charter. No date. [Principles](#).

⁸ Nieves Zúñiga, Examining State Capture: Undue Influence on Law-Making and the Judiciary in the Western Balkans and Türkiye, Transparency International, 2020; Slagjana Taseva, [Grand Corruption and Tailor-Made Laws in Republic of North Macedonia](#), Transparency International Macedonia, 2020.

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