

AGENCY FOR THE PROTECTION OF THE RIGHT TO FREE ACCESS TO PUBLIC INFORMATION

REPORT ON THE MONITORING OF THE PUBLISHED DOCUMENTS AND INFORMATION THAT THE GOVERNMENT OF REPUBLIC OF NORTH MACEDONIA, MINISTRIES AND CONSTITUTING AUTHORITIES AS INFORMATION HOLDERS ARE OBLIGED TO PUBLISH ON THEIR WEBSITES



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INTRODUCTION:

Public information is available to citizens in two ways - with the proactivity of the institutions themselves and with reactive means - that is, by submitting a request for information from certain public institutions. Proactive transparency implies the timely publication of public information by institutions that do so on their initiative before they are requested orally, in writing or electronically, through clear, transparent and easily accessible web pages containing all important information to citizens. Such proactive publication of information contributes to the strengthening of law and enables the public to become familiar with regulations, decisions, policy-making and other actions that are of interest and affect them.

All the obligations of the institutions to make their work transparent also apply to the Government of the Republic of North Macedonia, the ministries, the bodies included, covered by the Strategy for Transparency of the Government (2019-2022), as holders of public information Institutions work in the interest of citizens to ensure conditions for their development through their transparent operation. For that reason, it is important that citizens are promptly and informed about all information of importance to the public, and the holders are obliged to provide citizens with access to that information.

The general objective of the monitoring was to see the level of proactive transparency of this group of information holders, and in this report, we present the findings of the monitoring which examined the extent of published information that is relevant to citizens, for annual reports on their work, whether information seekers are given correct, precise and complete data, whether the holders have a designated official person to mediate with the public information, as well as numerous other questions based on which the application of the standards for proactive transparency is evaluated, in accordance with Article 10 of The law on free access to public information.

WHAT IS PROACTIVE TRANSPARENCY?

When the holders of public information are open to the public, citizens find out what and how the state government bodies and other establishments and institutions work. This enables them to participate equally in public life and continuously control the work of the authorities.

The proactive publication of public information is a legal obligation of all holders, on their initiative and continuously, to publish information on their work and actions, on decision-making, finances and the services they provide to citizens, on their websites.

The goal of fulfilling the obligation to proactively publish information is reflected in the opportunity for citizens/information seekers to exercise their constitutionally guaranteed right of access to information, by providing services to information holders in a simple

and fast way. At the same time, the holders of information receive the necessary legitimacy, because they demonstrate responsibility in their work, and thus restore the trust of the citizens in the institutions.

With the proactive publication of public information, the legal obligation is established for the holders not only to respond to the submitted requests concerning the Law on Free Access to Public Information but also to publish public information on their websites, such as and to those who are not requested. Proactive publication of public information is an integral part of the right of access to information, ensuring that key information is available on time. As stated by the European Court of Human Rights, which recognizes it as a fundamental human right, "information is changeable and any delay in its publication, even for a short period, may reduce its overall value and interest in it."

Proactively published information of the holders should be easily accessible and understandable, usable, relevant to citizens and regularly updated. Information is a prerequisite for responsible government and a basis for democratic processes - information about the work of the holders enables citizens to adequately draw conclusions and participate in decision-making on issues that are of their interest. Transparency and access to public information are inseparable instruments in the fight against corruption.

A major advantage of proactively releasing public information, especially when it is done immediately, is that it makes it more difficult for information holders to deny the existence of the information or manipulate it. This means that all citizens/seekers of public information are saved time, money and effort. With the possibility of access to information, it is possible to realize the principle of equality, which principle aims to strengthen trust in institutions. The low proactivity of publishing information makes it impossible for the public to monitor, control and participate in the work of information holders.

SUBJECT OF MONITORING:

The monitoring is focused on checking the categories of information that should be regularly updated and published on the websites of the holders of public information in accordance with the provisions of Article 9 and Article 10 of the Law on Free Access to Public Information (LFAPI).

PURPOSE OF MONITORING:

The purpose of the monitoring is to detect the conditions in the implementation of the obligation of the holders of public information to proactively publish the 22 categories of information on their websites. It helps in realizing the competence of the Agency for the protection of the right of free access to information of a public nature for the

implementation of the provisions of LFAPI and increasing the capacities of the holders of information of a public nature concerning their greater transparency and openness. Also, the monitoring will contribute to a better identification of the training needs of the officials among the information holders.

FOLLOW-UP FREQUENCY:

The frequency of monitoring can be once a year, on a two-year basis or over a longer period, to ensure comparability of results and to be used for problem identification, training needs and strategy development, for those reasons monitoring is worth conducting often enough.

FRAME OF REFERENCE:

The reference framework for monitoring is the questionnaire developed specifically for that purpose based on the categories listed in Article 10 of the LFAPI. The questionnaire for this group of holders contains 27 questions and sub-questions. All the questions to the holders of information stem from Article 10 of the LFAPI and through the said questions the holders carry out a self-evaluation of their web pages and their proactivity, i.e. whether and to what extent they publish the necessary information that is of interest to the citizens.

RESULTS OF THE MONITORING:

The agency, in accordance with its competencies, but also as an added value of free access to public information concerning the proactive publication of information in accordance with Article 10 of the Law on FAPI, conducted monitoring of 51 holders, i.e. on the websites of the holders of the Government of Republic of North Macedonia, the ministries and bodies included, covered by the Government's Transparency Strategy (2019-2022), as part of the holders published on the List of holders of information on the Agency's website. The monitoring was carried out in the period from November 14 to December 14, 2023. The Department of Cooperation and Analysis was in charge of monitoring the websites for the full publication of documents and information that the holders of information are obliged to publish according to Article 10 of the Law.

We should mention that the Monitoring does not analyze the contents, that is, the quality of the published information.

Monitoring was carried out according to the methodology implemented in cooperation with external experts, hired by the IPA II Project "Transparency and Accountability of Public Administration", whose beneficiary is the Agency. A questionnaire containing a total of 27 questions was drawn up, deriving from Article 10 of the Law. Some of them

contain one or more sub-questions, and the maximum number of possible points is 49 points. Holders of the published data receive 0, 0.5 and 1 point, that is, 2 points for a submitted responsive Questionnaire for self-evaluation by the holders, depending on the number and up-to-dateness of the published documents. The questionnaire was distributed to the holders, who were asked to evaluate their own transparency and return the questionnaires to the Agency.

Within the period provided for submitting the answers to the Agency, the holders submitted 30 questionnaires, of which 1 questionnaire did not contain links to the specific documents as requested and was not taken into account during the monitoring of the web pages. From 20 holders, we did not receive back completed questionnaires and these holders did not receive points for submitting and answering the self-evaluation questionnaire. With the questionnaire, the holders of information first perform a self-evaluation of their website, and the Agency checks whether the provided links are useful for the applicants, that is, the citizens when accessing their websites.



The web pages of the monitored holders are different both in appearance and in terms of their contents and the information that is published. It should be emphasized that the web pages of the holders are updated according to their activities and have their function as the first informant for the citizens and the services they provide. But we should emphasize that what is intended for easy access to public information, i.e. the banner/link <u>PUBLIC INFORMATION</u> in most of the web pages of the holders, is published on the home page, so that access to them will be quick, and at most with three clicks for the information requester. This added value in facilitating access to public information derives from the Extract from the Draft Minutes of the One Hundred and Twenty-First Session of the Government of the Republic of North Macedonia held on January 24, 2023, in which the holders covered by this monitoring undertake to place a banner with the title "public information" in a visible place on their websites and it

should lead to the public information, as well as to the requests and responses after requests. This obligation has been respected by 37 institutions, while 12 holders have partially fulfilled it, due to the fact that their links have been moved in some of the links on the web pages. Only two institutions have not yet placed this banner on their homepage. Most often, the institutions move the public information, the link to it, to links such as contact, public relations and similar sections of the web pages. We also want to emphasize that unsystematized information creates confusion among citizens, that is, information is more difficult to access. This means that web pages should be easily accessible, and thus the information needed by the applicants, following the legal obligation for transparency of the holders of public information. Therefore, we appeal to the holders of information to make their information easily available for use by citizens. "Informed citizens, satisfied citizens", is the maxim for transparent institutions that are at the service of citizens.

Depending on the total number of points that the monitored holders received in relation to the published necessary documents and information in accordance with Article 10 of the Law, a gradation was made of the degree of fulfilment of the legal obligation for their active transparency, as follows: holders with weak transparency between 0 and 11 points, holders with average transparency between 12 and 24 points, 25 and 35 good transparency and from 36 to 49 points with very good transparency.

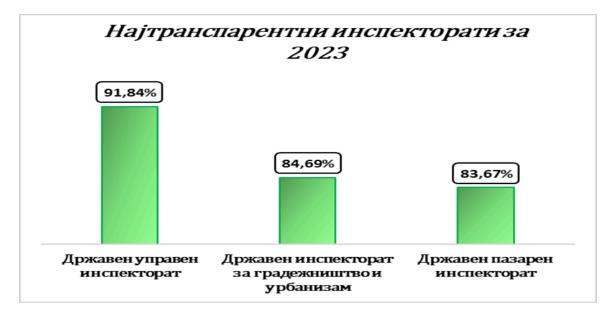
From the monitored 51 holders of information, according to the monitoring methodology, 29 holders have very good transparency, 16 holders have good transparency, and 5 holders have average transparency, and only one holder has poor transparency. We should emphasize that this year the transparency of the monitored institutions is 74.17%, which represents a very good transparency of the monitored institutions.

The obtained results show that the largest number of holders have improved their transparency, but we still want to emphasize that there is still room for improvement in the holders' websites and their proactive transparency so that the institutions will have satisfied applicants who will receive them quickly and simply the requested public information.



According to the results of the monitoring, the following are proactively transparent: the Ministry of Agriculture, Forestry and Water Management and the Ministry of Defense with 49 points, followed by the Ministry of Finance and the Customs Administration with 47 points. We should emphasize that the websites of the best-ranked institutions have an easy and accessible way of making public information of interest to the applicants, and we encourage them to monitor and build on proactive transparency, as well as accountability in their work to the citizens.

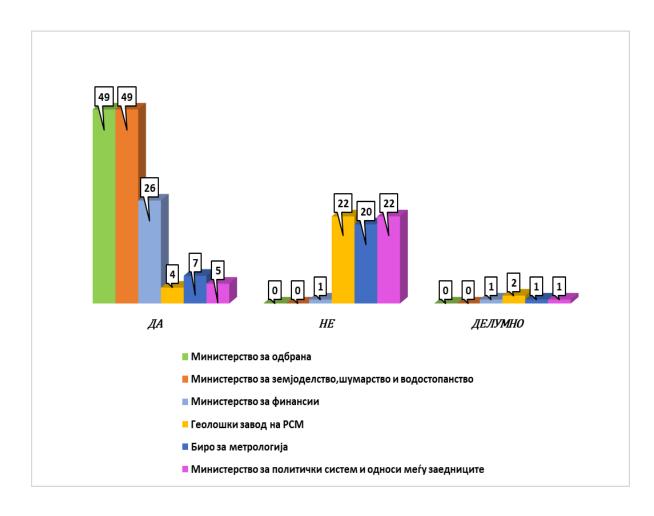




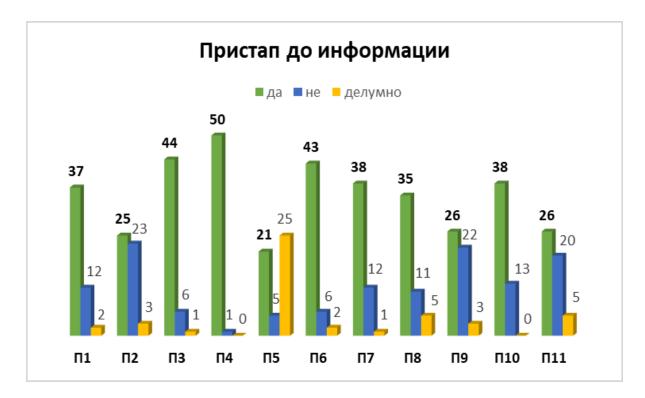
The Ministry of Agriculture, Forestry and Water Management for the second year in a row shows the best proactive transparency in relation to Article 10 of the Law on FAPI, together with the Ministry of Defense, which has continuity in its transparency and openness to information seekers.

The lowest transparency was shown by the Geological Institute of the Republic of North Macedonia with only 11 points, followed by: the Bureau of Metrology with 12 points, the Ministry of Political System and Relations between Communities with 13 points and the State Transport Inspectorate with 13.5 points. These holders should adapt their web pages for the end users, that is, the citizens, for reasons that it is difficult or impossible to obtain information about their work and their functioning on their web pages, which is the basic goal of proactive transparency.

Below is a graphic representation of the three most transparent monitored institutions that received points according to the self-evaluation questionnaire and the three proactively non-transparent institutions that also did not respond to the submitted questionnaire:

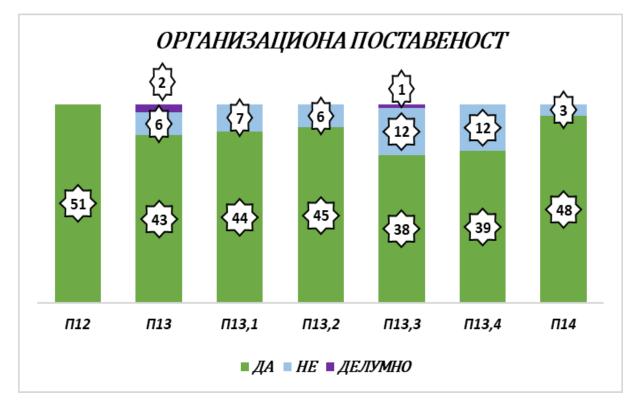


Based on the monitored web pages in accordance with the methodology and the Questionnaire, the following results and indicators for the proactive transparency of the holders were obtained: from a total of 51 monitored holders of the first group of questions: ACCESS TO INFORMATION, which contains 11 questions with sub-questions, the following results were obtained for their proactive transparency:



On their websites, 25 holders have published anonymously the requests/answers for free access to public information, while 23 holders do not publish them, which prevents the requesters from getting to know the requests that were submitted to them based on the Law on FAPI. Three holders have fulfilled this obligation partially because they have moved only part of the required years for publication. The monitoring of the web pages in the section on the published data for the officials who have been delegated the authority to mediate with public information showed that 43 holders have fulfilled their legal obligation, and 6 holders have not fulfilled it, that is, they have not moved data about the officials, and two holders have published partial information about the delegated official. These holders have not moved part of the data that they are required to publish, namely: contact phone number and e-mail address. 50 holders have moved the basic contact data with the owner of the information, and only one owner has moved the contact data on his website partially. 21 holders have published data about the official or responsible person at the holder of the information (biography and contact data), while 5 do not have basic data about the responsible persons in the institutions. Partial data has been moved by 25 holders. Basic data for contact with the person authorized for internal reporting, 38 holders have published on their website, while 12 institutions have not moved them. Only one holder has published partial information about the person for internal registration, that is, they do not have the contact phone and official e-mail data. A list of persons employed by the holder of the information with a position (official email and official phone) has been published by 35 holders, while 11 holders have not published this information. Partially published information has been moved by five holders. Clarification of the method of submitting the request for access to information (method of submitting oral, written request and electronically) has been published by 26 holders, and 22 institutions do not have the clarification on their web pages. Three institutions have partially fulfilled this obligation, in that they have not fully published the legal procedure for submitting a request for free access to public information. Also, a free access request form has been moved, 38 holders have on the web pages, and 13 holders have not published the form. Also, the legal obligation from Article 36 of the LFAPI to publish the Annual Report on the websites of the holders, 28 holders have published the report for 2022, while 23 institutions have not fulfilled the legal obligation. For 2021, 32 holders published the report and 19 holders did not move the report to their websites. With the publication of annual reports, information holders demonstrate the added value of proactive transparency.

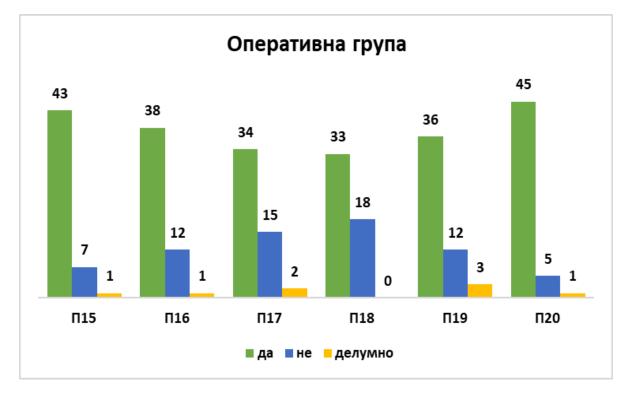
From the second group of questions: ORGANIZATIONAL STABILITY, the monitored 51 holders show very good transparency, and this can be seen from the table:



Concerning the publication of the laws relating to their jurisdiction, all monitored holders have published them and they are available on their websites. Only 2 holders do not make available to the requesters the regulations that the holder of the information adopts within their competence in the form of a by-law, and seven institutions do not publish the regulations for internal organization, while 44 of them publish them on the website, the systematization of 45 holders have moved the jobs to the required link, in contrast to 6 institutions that have not published this required document as information for citizens, one holder has published the rules for protected internal reporting in part,

while 12 of them have not published it, and 38 institutions posted it as information for citizens, while 38 institutions published decrees, orders and instructions as by-laws, while 12 do not publish this type of information. Organograms for internal organization have been published by 48 holders, and only 3 holders do not publish this document.

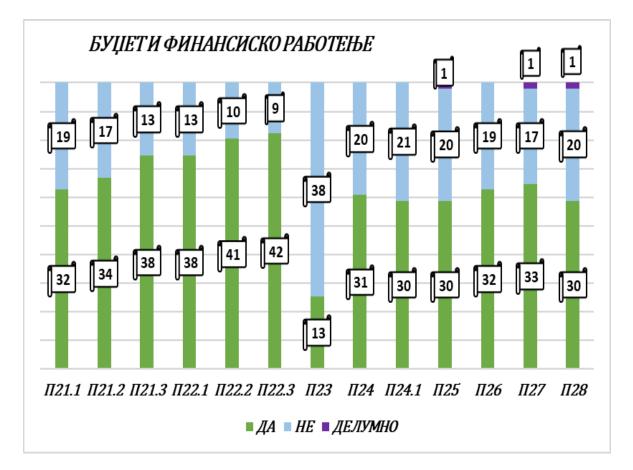
In the third OPERATIONAL group of questions, which refers to information from the scope of their work and contains 6 questions, the monitored holders have very good proactive transparency.



Of the required documents, 43 holders have published their strategic work plans, seven institutions have not moved them, and one has partially published them. Through the Work Strategies, citizens can get quality and relevant information and this document has been published by 38 holders, while 12 institutions have not published the strategies. Annual work plans and programs have been published by 34 holders, while 15 holders do not make these documents available to citizens, and only two institutions partially publish them. 38 institutions have moved the proposal documents to the web pages, and 18 holders do not publish this information on the web pages. It is necessary for the institutions to fulfill their transparency in the part in which they publish their reports on the work in full so that the citizens can be informed about how they have fulfilled their work and competence, and these documents have been published by 36 holders, while 12 institutions do not have them. published reports on their work, while 3 holders do not have them.

The published acts and measures resulting from the competence and work of the holders of information have been placed on their websites by 45 holders, while five holders have not moved this information, and only one institution partially informs the citizens about this type of document. In this group of issues, the holders should present their proactivity by publishing all the necessary documents arising from their competence and thus potential applicants will receive the information in a quick and simple way.

According to the monitoring, the holders should improve their proactive transparency mostly in the fourth group of issues: BUDGET, FINANCIAL OPERATION AND PUBLIC PROCUREMENT, for the reasons that the interest of the citizens is directed mostly concerning the financial operation of the institutions, and especially in the part of the published budgets, financial reports, audit reports and the publication of information and documents related to public procurement.



In the section on publishing budgets for the last three years, the monitored institutions show the following proactive transparency: 32 monitored institutions have published their budgets for 2023, while 19 have not published their institution's budget, for 2022 - 34 holders have published the necessary document, and 17 holders have not presented

it on the website. The situation with the published budget for 2021 does not differ from other years. In this section, 38 institutions published the requested information, and 13 institutions did not publish it on their pages.

Information about the final accounts for 2022, 2021 and 2020 have been moved to the web pages by 38 holders, while 13 institutions have not published the final accounts for 2022. For 2021, 41 holders have moved this information to the website, in contrast to 10 institutions that did not fulfil the legal obligation. The most information about the final account for 2020 was published by 42 institutions, compared to 9 institutions that did not proactively publish the requested document. This set of documents will have to be published by the holders for the reasons that the citizens should have an insight into how the funds from the budgets of the institutions were allocated and used for the needs of the citizens.

We would like to point out to the monitored holders that they should not publish their budgets in PDF format, but in Excel format so that they are viewable information in an open format and usable for citizens and those seeking public information, and also follow the global trend of this type of publication. With that, the information becomes usable for the work of applicants who do analyzes and other types of information, which will make the finances more accessible to the citizens. Also, each institution should publish its budget, that is, of the institution, and not as a full budget of the Republic of North Macedonia, because the same document will be unusable for information. Through the publication of this key financial document, citizens will be informed about the plans of the institutions in which way the financial resources will be spent and distributed for their work. We would like to emphasize that the publication of this information prevents potential corruption, and the reportable publication reduces the risk, but also the suspicion of possible corrupt acts.

Only 13 holders, out of a total of 51 monitored institutions, publish the quarterly financial reports, which are a legal obligation for the institutions to publish on their websites.

Audit reports have been published by 30 holders, and 21 institutions have not published this document. 31 holders report about the audit of their institution, while 20 institutions provide a link to the requested information. The audit report is an important document for citizens through which they can inspect the operations of the institutions see the remarks made in these reports for the holders and see if the institution has acted on the findings in the audit reports.

The results of the monitoring showed that also in the public procurement section, the holders should be very proactive in publishing these documents. So, only 32 institutions published the annual public procurement plan out of a total of 51 institutions. The annual plan was not published by 19 holders, and thus the citizens cannot see what and how the institutions predicted that they needed for their current operations. The

non-disclosure of the annual plan creates suspicion of possible corrupt actions among the holders. With the proactive publication of the annual public procurement plan, the institutions demonstrate their accountability concerning public procurement.

33 holders have published the announcements for public procurement, while 17 institutions have not linked the information on their websites regarding the public procurement announcement. One institution has partially moved this information, that is, it has only moved it as information for the advertisement (link), but it does not contain the specific information. Only 30 institutions published the notifications about the concluded contracts and fulfilled this legal obligation, while 20 holders did not publish the notification about the concluded contract. Also, one holder has partially posted this information. The publication of information in the public procurement section is one of the basic parameters in the anti-corruption operation of the institutions, but also for increasing the confidence of the citizens in their operations.

CONCLUSIONS AND RECOMMENDATIONS:

The level of transparency and accountability in the work of the Republic of North Macedonia Government, the ministries and the bodies within it have an increasing trend of proactive publication of information of a public nature and their transparency this year has been assessed as very good. Most of the monitored institutions have very good transparency and the Agency recommends to the holders to consistently respect the transparency and accountability standards in the future, for reasons that only in this way the institutions and their work will be more accessible to the end users, the applicants for public information, i.e. the citizens.

Information holders with average and poor transparency assessed monitoring need to invest much more effort to improve and strengthen their proactivity towards citizens as much as possible. The information they publish should be placed in a separate banner/link under the title PUBLIC INFORMATION, which will make it easily accessible to requesters and thus reduce the number of requests for free access to public information. The holders of their web pages have sub-links titled free access, public information, and transparency, but they are in links that are not transparent and easily accessible to citizens, that is, information requesters. The holders of their websites should monitor and publish their information regularly in accordance with Article 10 of the Law and their competencies.

Information holders, we will emphasize again, by setting up a unified banner in which they will publish public information, and at the same time update the information, will make the information more accessible to the citizens. In this way, the information requesters will be able to quickly and easily access the requested information that is of their interest.

In the future, the training that the Agency continuously organizes for officials with information holders, will continue to emphasize the active transparency and consistent application of Article 10 of the Law on FAPI, because in this way the holders help the citizens to better understand the functioning of the institutions, their rights and obligations, how they can influence the making of decisions that are reflected on their daily living and work, as well as to more easily access the services offered by the monitored institutions as holders of public information.

APPENDIX:

ANNEX 1: Table with the results of the monitoring of the Republic of North Macedonia Government, the ministries and the bodies in 2023

	INSTITUTIONS	Questionnaires answered	Final score	%	LEVEL OF PROACTIVE TRANSPARENCY
1	Ministry of Agriculture, Forestry and Water Management	yes	49	100%	VERY GOOD TRANSPARENCY
1	Ministry of Defense	yes	49	100%	
2	Ministry of Finance	yes	47	95,92%	
2	Customs Administration of Republic of North Macedonia	yes	47	95,92%	
3	Office of the President of the Republic of North Macedonia Government	yes	46	93,88%	
3	MISA	yes	46	93,88%	
4	State Educational Inspectorate	yes	45,5	92,86%	
5	Ministry of Economy	yes	45	91,84%	
5	Ministry of Environment and Spatial Planning	yes	45	91,84%	
5	State Administrative Inspectorate	yes	45	91,84%	
6	MTSP	yes	44,5	90,82%	
7	Government of Republic of North Macedonia -GS	yes	44	89,80%	
7	MIA	yes	44	89,80%	
7	Ministry of Justice	yes	44	89,80%	
7	MES (MON)	yes	44	89,80%	
8	Administration for the Protection of Cultural Heritage	yes	43	87,76%	
9	Republic of North Macedonia Food and Veterinary Agency	Not	42,5	86,73%	
10	Commission on relations with religious communities and religious groups	yes	41,5	84,69%	
10	State Inspectorate for Construction and Urbanism	Not	41,5	84,69%	
11	Bureau of Public Procurement	Not	41	83,67%	
11	Regional Development Bureau	yes	41	83,67%	
11	State Market Inspectorate	Not	41	83,67%	
12	Administration for Public Revenues	Not	38	77,55%	
12	State Environmental Inspectorate	yes	38	77,55%	
13	Ministry of Health	Not	37,5	76,53%	
14	State Statistical Office	yes	37	75,51%	

14	State Inspectorate for Agriculture	yes	37	75,51%	
15	Ministry of Culture	Not	36,5	74,49%	
16	Ministry of Local Self-Government	Not	36	73,47%	
17	Office for Representation of Republic of North Macedonia before the European Court of Human Rights	yes	35,5	72,45%	GOOD TRANSPARENCY
18	Republic of North Macedonia State Archive	Not	35	71,43%	
18	Bureau of Educational Development	yes	35	71,43%	
18	Financial Intelligence Authority	yes	35	71,43%	
18	State Inspectorate for Technical Inspection	yes	35	71,43%	
19	Ministry of Transport and Communications	Not	34,5	70,41%	
20	Assessment Bureau	Not	34	69,39%	
21	MFA	Not	33	67,35%	
21	Administration for keeping the registry books	yes	33	67,35%	
21	State Labor Inspectorate	partially	33	67,35%	
22	State Communal Inspectorate	yes	32	65,31%	
23	Agency for youth and sports	Not	31	63,27%	
23	Financial Police Authority	Not	31	63,27%	
24	National Security Agency	Not	30	61,22%	
25	Republic of North Macedonia Emigration Agency	yes	29	59,18%	
26	State Sanitary and Health Inspectorate	partially	27	55,10%	
27	Administration for enforcement of sanctions	Not	24,5	50%	AVERAGE TRANSPARENCY
28	State Inspectorate for Local Self-Government	Not	20	40,82%	
<mark>29</mark>	State Transport Inspectorate	Not	13,5	27,55%	
30	Ministry of Political System and Community Relations	Not	13	26,53%	
<mark>31</mark>	Bureau of Metrology	Not	12	24,49%	
32	Republic of North Macedonia Geological Institute	Not	11	22,45%	POOR TRANSPARENCY

ANNEX 2: Questionnaire for public information brokers regarding active transparency

First group ACCESS TO INFORMATION 1. Have you published the list of information on the home page? 2. Have you published anonymized requests/responses for free access to public information on the website? 3. Data from your competences? 4. The basic data for contact with the holder of information and that 4.1. name 4.2 address 4.3 telephone number 4.4 email address 4.5 the address of the Internet site 5. The information about the official or the responsible person with the owner of the information 5.1 biography 5.2 contact details 6. Basic data for contact with an official person for mediating information and that 6.1 name and surname 6.2 Email Address

6.3 telephone number

7. Basic data for contact with a person authorized for protected internal reporting and that

7.1 name and surname

7.2 email address

7.3 telephone number

8. List of persons employed by the holder of the information by position

8.1 official email

8.2 business phone

9. Clarification of the method of submitting the request for access to information (method of submitting an oral, written request and electronically)

10. A form for a request for free access to information of a public nature has been set up

11. From what year have you uploaded the annual report on access to public information

2022

2021

Second group ORGANIZATIONAL STABILITY

12. Laws relating to the jurisdiction of the holder of information

13. The regulations that the owner of the information adopts within his jurisdiction in the form of a by-law

13.1 internal organization rules

13.2 rulebook for the systematization of jobs

13.3 rules for protected reporting

13.4 decrees / orders / instructions

14. Organogram for internal organization

Third group OPERATIVE

15. Strategic plans for the work of information holders

16. Strategies for the work of information holders

17. Annual plans and work programs

18. Are proposals for documents posted on the website (proposals for programs, programs, views, opinions, studies?

19. Are the work reports that you submit to the supervisory authorities published?

20. Published acts and measures resulting from the competence and work of the holder of information

Fourth group BUDGET, FINANCIAL OPERATION AND PUBLIC PROCUREMENT
21. Annual budget for the last three years
2023
2022
2021
22. Final account for the last three years
2022
2021
2020
23. Quarterly financial reports for the current year
24. Has your institution been audited?
24.1 Has the audit report been published?
25. Has the annual public procurement plan been published?
26. Are public procurement announcements published?
27. Is the notice of the concluded contract published?
28. Answer questionnaire for self-evaluation