

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

# REPORT ON THE MONITORING OF THE PUBLISHED DOCUMENTS AND INFORMATION THAT THE MUNICIPALITIES AND CENTERS FOR THE DEVELOPMENT OF PLANNING REGIONS IN THE REPUBLIC OF NORTH MACEDONIA AS HOLDERS OF THE INFORMATION ARE OBLIGED TO PUBLISH ON THEIR WEBSITES



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### INTRODUCTION:

Public information is available to citizens in two ways - by proactivity of the institutions themselves and by 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 that contain all information of importance 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 institutions' obligations to make their work transparent also apply to the bodies of the municipalities, the city of Skopje and the municipalities in the city of Skopje and the Centers for the Development of Planning Regions, as holders of information of a public nature. The municipalities, as well as the Centers for the Development of the Planning Regions, with their competencies, work in the interest of the citizens to provide conditions for their development through their transparent operation. For that reason, it is important that the citizens are promptly and clearly informed about all the information of importance to the public, and the Local Self-Government Units and the planning regions for development are obliged to provide the citizens with access to that information.

The general objective of the monitoring was to see the level of proactive transparency of the Municipalities and Centers for the Development of Planning Regions. In this report, we present the findings of the monitoring which examined the extent of published information that is relevant to citizens, for the annual reports on their work, whether they provide accurate, precise and complete data to the information requesters, 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, according to the 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 own initiative and continuously, to publish information on their work and actions, on

decision-making, finances and on the services they provide to citizens, on their web sites.

The goal of fulfilling the obligation to proactively publish information is reflected in the opportunity for citizens/information requesters 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 information of a public nature, the legal obligation is clearly established for the holders not only to respond to the submitted requests in relation to the Law on Free Access to Public Information but also to publish public information on their websites, such as and those that 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 in a timely manner. 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 of time, 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 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/requesters of public information are saved time, money and effort. The principle of equality enables the realization of this right, fulfilment of obligations, as well as participation in political, social and economic processes, all with the aim of strengthening 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 (ZFAPI).

### 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 ZFAPI and increasing the capacities of the holders of information of a public nature in relation to 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 monitoring frequency can be once a year, on an annual basis or over a longer period. In order to ensure the comparability of the results and to use them for problem identification, training needs and strategy development, it is worth monitoring to be carried out often enough.

### FRAME OF REFERENCE:

The reference framework for monitoring should be the questionnaire developed specifically for that purpose based on the categories listed in Article 10 of the ZFAPI. The questionnaire differentiates relevant issues for the municipalities, that is, the Local Self-Government Units and Centers for the Development of Planning Regions. The questionnaire for the Municipalities contains 40 questions and sub-questions, and for the Centers the questionnaire contains 32 questions and sub-questions. Basically, all the questions to the holders of information stem from Article 10 of the ZFAPI 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 information of a public nature in relation to the proactive publication of information in accordance with Article 10 of the Law on FAPI, carried out monitoring of 89 holders, i.e. on the websites of the holders from the Local Self-Government Units, the community of RSM local self-government units and Centers for the Development of Planning Regions published on the List of Information Holders on the Agency's website. The monitoring was carried out in the period from April 10 to May 15, 2023. The

Department of Cooperation and Analysis was in charge of monitoring 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.

The monitoring was conducted in accordance with Article 10 of the Law on Free Access to Public Information (Official Gazette of the Republic of Macedonia No. 101/2019).

Out of a total of 89 entities monitored in the specified period, 88 are registered in the List as holders, and an official letter was sent to the Center for Development of the Polish Planning Region during the monitoring for the appointment of an official to mediate the information of a public nature, but web the site of the center was monitored in order to obtain a complete picture of the proactive transparency of this category of holders.

We would like to mention that in the period of July 2021, the Agency carried out monitoring of the municipalities and development centers of the planning regions, but it was carried out according to a different methodology, and this monitoring was carried out in accordance with 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. Two questionnaires were prepared (one intended for the Municipalities, and the second for ZELS and CRPR) containing a total of 40 questions, ie 32, which derive from Article 10 of the Law. Some of them contain one or more sub-questions, and the maximum number of possible points is 60 points for the Municipalities and 52 for ZELS and CRPR. Holders of published data received 0, 0.5 and 1 points, depending on the number and up-to-dateness of the published documents. The questionnaire was distributed to the holders, who were asked to carry out an evaluation of their own transparency and return the questionnaires to the Agency.

Within the deadline for submitting the answers to the Agency, the holders submitted 47 questionnaires, 10 of which did not contain links to the specific documents as requested and were not taken into account during the monitoring of the web pages.

The web pages of the monitored holders from the Municipalities are not unified, that is, they are different both in appearance and in terms of their contents and the information that is published. Unlike the web pages of the municipalities, the Centers for the Development of Planning Regions have the same web pages and the information for some of these holders is unified. They 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 the goal of easy access to public information, i.e. the list of information on most of the web pages of the holders is not published on the home

page, so access to it will be quick and with a maximum of three clicks to the requester of the information. Most often, public information, the link to it, is moved by the institutions to the Public Relations, Contact 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 requestors is in accordance with 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 local government units.

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 many low levels of transparency who have between 0 and 15 points, with a low level between 16 and 30 points, medium level holders between 31 and 46 points, and with a high level of transparency between 47 and 60 points.

From the monitored 89 holders of information, according to the monitoring methodology, 16 holders have a high level of transparency, 47 holders have a medium level of transparency, 24 have a low level of transparency, and two holders showed a very low level of transparency. Monitored holders have a mean value of proactive transparency. However, this does not mean that the Local Self-Government Units should be satisfied with their transparency because the websites of the largest number of municipalities are it easy to obtain certain information that is of interest to citizens/public information requesters.

According to the results of the monitoring, the municipalities of Valandovo, Demir Hisar, Berovo, Bitola and Delchevo are the most transparent with 58 and 57 points respectively, followed by the three municipalities with 56 points. Two years ago, the municipalities of Valandovo and Demir Hisar again showed the highest transparency on their web pages with 96.6%, that is, 95% active transparency of published information in accordance with Article 10 of the Law on FAPI. Also, the municipalities of Arachinovo and Zelenikovo again with the least amount of published information according to ZFAPI. We should emphasize that the municipalities of Valandovo and Demir Hisar practice proactive transparency and accountability in their work to the citizens in an easy and accessible way accessible to applicants.

The comparative analysis of the monitoring shows that 8 municipalities remained with the same transparency values, 3 with a high level of transparency, 2 municipalities with a medium level of transparency, 1 municipality with a low and 2 municipalities with a very low level of transparency.

An increase in the level of transparency was noted by 36 municipalities, of which 3 municipalities with a high level, 22 municipalities with an average level, 7 municipalities with a low level and 4 municipalities with a very low level of transparency.

9 municipalities with a very low level of transparency, 14 municipalities with a low level, 12 with an average level and 2 municipalities with a high level of transparency, ie 37 municipalities, recorded a decrease in the level of transparency.

The biggest jump in the level of transparency is observed in 4 municipalities, namely: Centar Župa - an increase of 34 places; Debar - an increase of 29 places; Kavadarci - an increase of 28 places and Butel - an increase of 27 places.

The biggest drop in the level of transparency is also in 4 municipalities: Novaci - drop by 39 places; Caška - drop by 38 places; Pehchevo - drop by 37 places and Rosoman - drop by 32 places.

In general, 37 municipalities or 29.97% of municipalities have an improvement in terms of active transparency, 36 municipalities or 29.61% have less active transparency and 8 municipalities or 6.48% remain with the same active transparency.

Seen from a regional perspective, the leading place is the Eastern region with 70.28% active transparency, bearing in mind that in this region there are also the municipalities of Berovo and Delčevo with the best results in fulfilling their obligations to the citizens, and in the last place among the regions is Skopje with 52.90% active transparency together with the municipalities with the lowest active transparency Zelenikovo and Arachinovo.

Based on the monitored web pages according to the methodology and the Questionnaire, the following results and indicators for the proactive transparency of the holders were obtained: out of a total of 89 monitored holders, 35 have published a link to the List of Information on the home page, and 51 do not have a banner/link. 54 have published data about their competence, and 33 have not published data, and all holders have published the basic contact data with the holder of the information. The data on the official or the person in charge of the holder of the information: 73 holders have published a biography on the web pages, and 16 have not published a biography of the person in charge.

From the monitoring, we can conclude that in the free access to information link, 76 holders have published the basic contact data for officials who mediate public information, while 13 holders have not published the data. 40 holders have uploaded data on persons for authorized protected internal reporting, and 49 have not fulfilled this obligation. 51 institutions have published a list of persons employed by the holder of the information with an official e-mail, 32 have not published data, 46 have published an official telephone number for employees in their institutions, and 33 have not published this information. In the section for clarification of the way of submitting the request for

access to information (way of submitting an oral, written request or electronically), only 30 holders clarify how the requesters can get the requested public information. The availability of the Free Access Request Form is with 62 holders, and some of them have still uploaded the Free Access Request Form in accordance with the Law of 2006 and the amendments of 2010/15. The annual report on access to public information (2022 and 2021) has been uploaded on their websites by 44 holders for 2021 and 49 for 2022, while 45 have not published it for 2021 and 40 for 2022 in accordance with Article 36 of the Civil Code.

The laws that refer to the authority of the holder of information have been set by 42 holders, with which the citizens, that is, the applicants, can get acquainted with the basic information about the basis on which the holders from the state institutions work, while 40 do not have it. In the section in which the holders inform about the Regulations within their competence in the form of a by-law, which refer to: the rules for internal organization, this document has been published by 31 holders, the rules for the systematization of jobs on the web pages have moved 46 subjects. Only 20 institutions have published the rules for protected internal reporting by monitored holders. In the section of orders and instructions, only 16 holders publish this kind of information. An organogram for internal organization has been published on the web pages by 58 holders from ELS, ZELS and CRPR.

As part of the questionnaire that was delivered to the holders of information from this category, there were also questions about whether they had published the Statute, the official gazettes of the municipalities, the agendas of the sessions and the decisions of the councils of the municipalities. The following results can be obtained from the monitored pages: 65 holders have published the statutes, while 16 have not moved them to their web pages. Official Gazettes were posted by 64 holders, and 11 did not publish them. The agendas for the Council sessions are published by 48 holders, and 32 do not publish this information so that the citizens are aware of what the holders will discuss at their sessions. 62 holders publish the decisions of the Council, while 20 of them do not fulfil this obligation.

42 holders have published strategic plans for their work, and 45 of them have not published this information. Work strategies have been published by 49 holders, while 38 have not moved this information. Annual plans and work programs have been published by 50 entities, and 33 entities do not publish this type of information. The proposal of documents (proposal of programs, programs, views, opinions, studies) on the web pages have been moved by 54 holders, while 33 holders have not published. On the web pages in the section where the holders publish the reports on the work, 44 holders have published reports, and 34 do not publish this information, while 11 partially fulfil this obligation. Statistical data that affect the life and health of citizens, the monitoring showed that this type of information has been moved by all the monitored subjects by publishing the data on their websites.

Information about the published acts and measures resulting from the authority and work of the holder, the monitoring showed that 54 holders publish this type of information on their web pages, while 31 do not publish the same. In the section for published services provided by the holders of information, 77 holders move the necessary information with which they familiarize citizens with the services they offer for the same, 45 holders move information about information related to the tariff rates for fees for issuing real acts, and 32 do not fulfil this obligation, so citizens are not able to get this information in a quick and simple way.

A total of 54 holders publish the information on urban planning, and 16 do not move this data. Also, information on building permits is moved by 43 holders, while 37 do not publish this information. Information related to local economic development is published by 46 holders, and 26 do not link it on their web pages. Information about communal activities was published by 50 holders, while 26 are not proactive in relation to this information.

For the last three years (2023, 2022 and 2021) 65, 80 and 76 holders have published their annual budgets, and 24, 9 and 13 holders have not published the information. The final accounts for the last three years have been moved by 59, 73 and 68 holders, 30, 16 and 21 holders have not published this information. Quarterly financial statements have been published by 52 entities, and 36 entities have not published the required information. In connection with the publication of audit reports, this information was published by 33 holders.

Monitored holders, when it comes to information related to public procurement, published the following information: the number of holders who have published the annual plan for public procurement is 44, and 45 have not published it on their websites. Concerning the published public procurement notices, 64 holders have moved this information, while 23 holders have not published the information on the web pages. Also, 67 holders published the notice of the concluded agreement, and 22 entities did not publish the information. The same number of the monitored holders (7) proactively published the information about the concluded contract for public-private partnership and published the contract on the web pages.

The monitoring of the web pages of the Municipalities and Centers for the Development of Planning Regions showed that as holders of public information, they should improve and strengthen their proactivity towards the citizens as much as possible. The information they publish should be placed in a separate banner/link under the title LIST OF INFORMATION/FREE ACCESS TO INFORMATION, which will make it available to applicants 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, on their websites, should monitor

and regularly publish their information in accordance with Article 10 of the Law and their competencies. The holders will practice this by placing a unified banner in which they will list the necessary information that they have published in separate links on the web pages, but also the information that they will have to constantly update and publish. In that way, information requesters will be able to access information that is of interest to them in a quick and simple way.

In the future, in the training that the Agency continuously organizes for officials with information holders, it 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 life and work, as well as to more easily access the services offered to the holders of public information with their competence.

### **APPENDIX:**

ANNEX 1: Table with the results of the monitoring of the Municipalities and Centers for the Development of the Planning Regions for 2023

Serial	Municipalities and Centers for the Development of		
no.	Planning Regions	Points	A legend
			Municipalities with a high
1	Municipality of Valandovo	58	level of transparency
2	Municipality of Demir Hisar	57	
3	Municipality of Berovo	56	
3	Municipality of Bitola	56	
3	Municipality of Delchevo	56	
6	Municipality of Veles	52	
7	Municipality of Gradsko	51	
7	Municipality of Kochani	51	
9	Municipality of Kriva Palanka	51	
10	Municipality of Kavadarci	50	
11	Municipality of Center	49,5	
12	Municipality of Vasilevo	48	
12	Municipality of Zrnovci	48	
12	Municipality of Karposh	48	
12	Municipality of Probishtip	48	
16	Centar Zupa Municipality	47	
			Municipalities with a
			medium level of
17	Municipality of Kumanovo	46,5	transparency
18	Municipality of Gazi Baba	45,5	

18	Municipality of Prilep	45,5
20	Kisela Voda Municipality	45
	Center for Development of the Eastern Planning	
20	Region-Shtip	45
22	Municipality of Ohrid	44,5
23	Municipality of Debar	44
23	Center for Development of Vardar Planning Region-Veles	44
25	Airport Municipality	43
25	Municipality of Bogdanci	43
25	Municipality of Gevgelija	43
25	Municipality of Sveti Nikole	43
29	Municipality of Ilinden	42,5
30	Municipality of Konche	42
31	Municipality of Bosilovo	41,5
31	Municipality of Strumica	41,5
33	Municipality of Debrca	41
33	Municipality of Cheshinovo-Obleshevo	41
35	Stip Municipality	40,5
	Center for Development of the South-Eastern Planning	
35	Region-Strumica	40,5
37	Municipality of Brvenica	40
37	Kicevo Municipality	40
37	Municipality of Mavrovo and Rostusha	40
40	Municipality of Gostivar	38,5
41	Municipality of Krushevo	38
42	Municipality of Makedonska Kamenica	37,5
42	Mogila Municipality	37,5
42	Municipality of Resen	37,5
45	Municipality of Petrovec	37
45	Municipality of Butel	37
45	Municipality of Vevcani	37
45	Municipality of Makedonski Brod	37
49	THE CITY OF SKOPJE	36,5
49	Municipality of Chaska	36,5
49	Municipality of Kratovo	36,5
52	Municipality of Vinica	35
53	Municipality of Negotino	34,5
53	Municipality of Novo Selo	34,5
53	Municipality of Struga	34,5
56	Municipality of Radovish	33,5

	Center for the Development of the Skopje Planning		
57	Region-Skopje	34	
58	Municipality of Zhelino	33	
59	Municipality of Novaci	32,5	
60	Municipality of Staro Nagoricane	32	
61	Municipality of Tearce	32	
62	Municipality of Gjorce Petrov	31	
	Center for Development of South-West Planning		
63	Region-Struga	30,5	
C 4	Marriaga literat Danas in in	20	Municipalities with a low
64	Municipality of Bogovinje	30	level of transparency
65	Municipality of Tetovo	29,5	
66	Municipality of Dojran	29	
67	Municipality of Pehchevo  Community of units of the local self-government	28	
68	RSM-ZELS	27,5	
69	Municipality of Lipkovo	27	
69	Rankovce Municipality	27	
71	Municipality of Plasnica	25	
72	Municipality of Studeničani	24,5	
73	Municipality of Sopishte	24	
73	Municipality of Chucher Sandevo	24	
75	Municipality of Karbinci	23	
75	Chair Municipality	23	
77	Municipality of Vrapcishte	22	
77	Municipality of Jegunovce	22	
77	Krivogastani municipality	22	
	Center for Development of the North-Eastern Planning		
80	Region-Kumanovo	20,5	
81	Rosoman Municipality	19,5	
82	Municipality of Lozovo	19	
83	Municipality of Demir Kapija	18,5	
84	Municipality of Dolneni	18	
85	Municipality of Saraj	17	
	Center for Development of Pologsky Planning		
85	Region-Tetovo	17	
87	Shuto Orizari Municipality	16,5	Navaisiasittis 111
88	Municipality of Zelenikovo	14	Municipalities with a very low level of transparency
89	Municipality of Arachinovo	13,5	· · · · · · · · · · · · · · · · · · ·

ANNEX 2: Comparative analysis of the monitoring results of the Municipalities and planning regions for 2021 and 2023

numerpunites and planning regions for 2021 and 2020							
High level of transparency							
Municipality	2021	2023					
Valandovo	1	1					
Demir Hisar	2	2					
Kochani	3	<b>↓</b> 7	down 4 places				
Bitola	4	4					
Crooked Palanka	5	<b>↓</b> 9	down 4 places				
Veles	6	<b>↓7</b>	drop by 1 place				
Berovo	7	<b>†3</b>	an increase of 4 places				
Delcevo	8	<b>†3</b>	an increase of 4 places				
Medium level of transparency							
Ohrid	9	<b>↓22</b>	down 13 places				
Stip	10	<b>↓</b> 35	down 25 places				
Chashka	11	<b>↓</b> 49	down 38 places				
Konche	12	<b>↓</b> 30	down 18 places				
Gevgelija	13	<b>↓</b> 25	down by 12				

Prilep	14	<b>_18</b>	down 4 places
Sveti Nikole		*	down 4 places
	15 16	<b>↓</b> 25 ↑12	•
Zrnovci	17	17	down 4 places
	18		down 36 places
Poppy. Kamenica		<b>↓42</b>	down 26 places
Karposh	19	↑12 ↓50	an increase of 7 places
Novaci	20	<b>↓</b> 59	down 39 places
Vasilevo	21	<b>↑12</b>	an increase of 9 places
Center	22	<b>↑11</b>	an increase of 11 places
Strumica	23	<b>↓31</b>	down 8 places
Krushevo	24	<b>↓41</b>	down 17 places
Probishtip	25	↑12	an increase of 13 places
Mavrovo and Rostusha	26	<b>↓</b> 37	down 11 places
Makedonski Brod	27	<b>↓</b> 45	down 18 places
Gradsko	28	<b>↑7</b>	an increase of 21 places
Debrca	29	<b>↓33</b>	down 4 places
Pehcevo	30	<b>↓67</b>	down 37 places
Bosilovo	31	31	
Gazi Baba	32	<b>↑18</b>	an increase of 14 places
Radovish	33	<b>↓</b> 56	down 23 places
Resen	34	<b>↓42</b>	down 8 places
Bogdanci	35	<b>↑25</b>	an increase of 10 places
Novo Selo	36	<b>↓</b> 53	down 17 places
Kavadarci	38	<b>↑10</b>	an increase of 28 places
Mogila	39	<b>↓42</b>	down 3 places
Vinica	40	<b>↓52</b>	down 12 places
The City of Skopje	41	<b>↓</b> 49	down 8 places
Aerodrom	42	<b>↑25</b>	an increase of 17 places
Kisela Voda	43	↑20	an increase of 23 places
Zhelino	44	<b>↓58</b>	down 14 places
Cheshinovo-Obleshevo	45	<b>↑33</b>	an increase of 12 places
Low level of transparency			
Kichevo	48	<b>↑37</b>	an increase of 11 places
Rosoman	49	<b>↓81</b>	down 32 places
Centar Zhupa	50	↑16	an increase of 34 places
Kratovo	51	<b>↑49</b>	an increase of 2 places
Debar	52	↑23	an increase of 29 places
Tetovo	53	<b>↓</b> 65	down 12 places
Petrovec	54	<b>↑45</b>	an increase of 9 places
Ilinden	55	↑29	an increase of 26 places
Vevcani	57	↑45	an increase of 12 places
Carbinci	58	<b>175</b>	down 17 places
Brvenica	59	↑37	an increase of 22 places
		1	p

Dolneni	60	<b>↓</b> 84	down 24 places
Negotino	61	<b>↑53</b>	an increase of 8 places
Struga	62	<b>↑53</b>	an increase of 9 places
Sopishte	63	<b>↓73</b>	down 10 places
Gjorche Petrov	64	<b>↑62</b>	an increase of 2 places
Demir Kapija	65	<b>↓83</b>	down 22 places
Gostivar	66	<b>↑40</b>	an increase of 26 places
Shuto Orizari	67	<b>↓87</b>	down 20 places
Tearce	68	<b>↑64</b>	an increase of 4 places
Rankovce	69	69	
Tears	70	<b>↑61</b>	an increase of 9 places
Very low level of transparency			
Butel	72	<b>↑45</b>	an increase of 27 places
Saraj	73	<b>↓</b> 85	down 12 places
Krivogashtani	74	<b>↓77</b>	down 3 places
Chair	75	75	
Lipkovo	77	<b>↑69</b>	an increase of 8 places
Lozovo	78	<b>↓82</b>	down 4 places
Studenichani	79	<b>↑72</b>	an increase of 7 places
Jegunovce	81	<b>↑77</b>	an increase of 4 places
Dojran	82	<b>↑66</b>	an increase of 16 places
Chucher-Sandevo	83	<b>↑73</b>	an increase of 10 places
Staro Nagorichane	84	↑60	an increase of 24 places
Plasnica	85	<b>↑71</b>	an increase of 14 places
Zelenikovo	86	<b>↓</b> 88	down 2 places
Vrapchishte	87	<b>↑77</b>	an increase of 10 places
Arachinovo	88	88	

Centers for the development of planning			
regions	2021	2023	
Center for Development of the Eastern			
Planning Region-Shtip	37	<b>↑20</b>	an increase of 17 places
Center for Development of the Vardar Planning			
Region - Veles	46	<b>↑23</b>	an increase of 13 places
Center for Development of the South-Eastern			
Planning Region - Strumica	47	<b>↑35</b>	an increase of 12 places
Center for the Development of the Skopje			
Planning Region-Skopje	76	<b>↑57</b>	an increase of 19 places
Center for Development of the South-West			
Planning Region - Struga	71	<b>↑63</b>	an increase of 8 places

Community of local self-government units of			
RSM-ZELS	56	<b>↓68</b>	down 12 places
Center for Development of the North-Eastern			
Planning Region-Kumanovo	80	80	same active transparency
Center for Development of Pologsky Planning			
Region-Tetovo	/ /	17	

### **ANNEX 3: Results for the proactive transparency of regions in Republic of North Macedonia**

И сточен регион	70,28%		Југоисточен регион	69,04%		Југозападен регион	64,78%		Пелагониски регион	63,719
анг Општина		Ранг	Општина		Ранг	Општина		Ранг	Општина	
1 Берово	93,30%	1	Валандово	96,60%		Центар Жупа	78,30%	1	Демир Хисар	95,00%
2 Делчево	<b>93,30</b> %	1	Василево	80,00%		? Олрид	74,16%	2	Битола	93,30%
3 Кочани	85,00%	3	Гевгелија	72,00%		Дебар	73,30%	3	Прилеп	76,00%
4 Зрновци	80,00%	4	Богданци	72,00%		Дебрца	68,30%	4	Крушево	68,30%
5 Пробиштип	80,00%	5	Конче	70,00%	. !	Кичево	66,60%	5	Мопила	62,50%
6 Чешиново-Облешево	68,30%	- (	Босилово	69,16%	(	і Мак.Брод	61,60%	6	Ресен	62,509
7 Wwn	67,50%	7	Струмица	69,00%		Вевчани	61,60%	7	Новаци	54,169
8 Мак. Каменица	€2,50%		Ново Село	∑57,50%	1	В Струга	57,50%	8	Кривогаштани	36,609
9 Виница	58,33%	9	Радовиш	₹55, <b>83</b> %		Э Пласница	41,66%	9	Долнени	30,009
10 Пехчево	46,60%	11	Дојран	48,30%						
11 Карбинци	38,30%									
Северонсточен регион	61,11%		Вардарски регион	60,01%						
анг Општина		Ранг	Општина			Полошин регион	53,11%		Скопски регион	52,90
1 Крива Паланка	<b>85,00</b> %	1	Велес	86,60%	Ранг	Општина		Paur	Општина	
2 Куманово	77,50%	1	Градоко	85,00%	1	L Бр <del>оениц</del> а	66,60%	1	Центар	82,509
3 Кратово	60,83%	3	Кавадарци	83,30%	1	Маврово и Ростуше	66,60%	2	Карпош	80,009
4 Старо Нагоричане	53,30%		Свети Николе	72,00%		Гос <b>тив</b> ар	64,16%	3	Гази Баба	75,80%
5 Ранковце	45,00%	5	Чашка	60,83%	į į	Желино	55,00%	4	Кисела Вода	75,00%
6 Липково	45,00%	- (	Неготино	57,50%	Į į	Теарце	53,30%	5	Аеродром	71,60%
		7	Росоман	32,50X	(	Боговиње	50,00%	6	Илинден	70,839
			/1030B0	31, <del>6</del> 0%		<sup>7</sup> Тетово	49,16%	7	Петровец	61,609
		9	Демир Капија	30,80X	;	В Јегуновце	36,60%	8	Бутел	61,609
						Э Врапчиште	36,60%	9	Град Скопје	60,839
								19	Ѓорче Петров	51,66%
								11	Студеничани	40,809
									Connune	40,000
								13	Чучер Сандево	40,00
									Чамр	38,30%
									Capaj	28,30%
									Шуто Оризари	27,509
									Зелениково	23,309
									Арачиново	22,50%

# ANNEX 4: Questionnaire for officials for mediating public information regarding the active transparency of the Municipalities and the City of Skopje

### I group Access to information

- 1. Do you have the list of information posted on the home page?
- **2.** Have you published anonymized requests/responses for free access to public information on the website?
- 3. Data on your jurisdiction?
- **4.** The basic data for contact with the holder of information:
- 4.1. name
- 4.2 address
- 4.3 telephone number
- 4.4 fax number
- 4.5 email address
- 4.6 the address of the Internet site
- **5.** The information about the official or the person in charge with the holder of the information
- 5.1 biography
- 5.2 contact details
- **6.** Basic contact details for an official person for mediating public information
- 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
- 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 way of submitting the request for access to information (way of submitting oral, written request and electronically).
- 10. A request form for free access to public information has been submitted
- **11.** The year for which you have uploaded the annual report on access to public information

### **II group Organizational setting**

- **12.** Laws relating to the jurisdiction of the holder of information
- **13.** The regulations that the information holder adopts within their 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 Orders
- 13.5 instructions
- 14. Organogram for internal organization
- 15. Is the statute of the municipality, ZELS, published?
- **16.** Is the Official Gazette of the municipality published?
- 17. Are the daily agendas for the sessions of the council of the municipality published?
- **18.** Are the decisions of the council of the municipality/planning region published?

### **III group Operative**

- 19. Strategic plans for the work of information holders
- 20. Strategies for the work of information holders
- **21.** Annual plans and work programs
- **22.** Are proposals for documents uploaded to the website (proposals for programs, programs, views, opinions, studies)
- 23. Are the work reports that you submit to the supervisory authorities published?
- 24. Do you publish statistical data that affect the life and health of citizens
- **25.** Published acts and measures that result from the competence and work of the holder of information
- 26. Are the types of services provided by the information holders published?
- 27. Tariffs for fees for issuing real deeds
- **28.** Are DUP/GUP (urban planning information) published?
- **29.** Is information about urban planning (building permits) published?
- **30.** Is information about local economic development published?
- **31.** Is information about communal activities published?

### IV Budget, financial operations and public procurement

32. Annual budget for the last three years

2023

2022

2021

33. Final account for the last three years

2022

2021

2020

- **34.** Quarterly financial statements for the current year
- **35.** Has your institution been audited?

- 35.1 Has the audit report been published?
- **36.** Has the annual public procurement plan been published?
- **37.** Are public procurement notices published?
- **38.** Is the notice of concluded contract published?
- **39.** Do you have a public-private partnership agreement?
- **40.** Is the public-private partnership agreement published on the website?

## ANNEX 5: Questionnaire for officials to mediate public information regarding the active transparency of Centers for the Development of Planning Regions

### I group Access to information

- 1. Do you have the list of information posted on the home page?
- **2.** Have you published anonymized requests/responses for free access to public information on the website?
- 3. Data on your jurisdiction?
- 4. The basic data for contact with the holder of information:
- 4.1. name
- 4.2 address
- 4.3 telephone number
- 4.4 fax number
- 4.5 email address
- 4.6 the address of the Internet site
- **5.** The information about the official or the person in charge with the holder of the information
- 5.1 biography
- 5.2 contact details
- 6. Basic contact details for an official person for mediating information
- 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
- 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 request form for free access to public information has been submitted
- 11. The year for which you have uploaded the annual report on access to public information

#### 2022

#### 2021

- **12.** Laws relating to the jurisdiction of the holder of information
- **13.** The regulations that are adopted by the owner of the information in the form of a by-law within the scope of his authority:
- 13.1 internal organization rules
- 13.2 rulebook for the systematization of jobs
- 13.3 rules for protected reporting
- 13.4 Orders
- 13.5 instructions
- 14. Are the decisions of the planning region published?
- 15. Organogram for internal organization
- **16.** Strategic plans for the work of information holders
- 17. Strategies for the work of information holders
- **18.** Annual plans and work programs
- **19.** Are proposals for documents uploaded to the website (proposals for programs, programs, views, opinions, studies)
- 20. Are the work reports that you submit to the supervisory authorities published?
- 21. Do you publish statistical data that affect the life and health of citizens
- **22.** Published acts and measures that result from the competence and work of the holder of information
- 23. Are the types of services provided by the information holders published?

### IV Budget, financial operations and public procurement

24. Annual budget for the last three years

2023

2022

2021

25. Final account for the last three years

2022

2021

2020

- 26. Quarterly financial reports for the current year
- 27. Has your institution been audited?

- 27.1 Has the audit report been published?
- **28.** Has the annual public procurement plan been published?
- **29.** Are public procurement notices published?
- **30.** Is the notice of the concluded contract published?
- **31.** Do you have a public-private partnership agreement?
- **32.** Is the public-private partnership agreement published on the website?