

2016

SCORECARD REPORT

How open is the Kosovo Government? Kosovo Open Governance Scorecard results



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Introduction

Public institutions gather, record, and hold information of public importance. The need to inform the public about laws and decisions, and the right of the public to be informed, to know their rights and obligations is the first driver of information disclosure. In general, the public can access these information through the following two ways. Firstly, when the public institutions disclose information in response to requests from the general public (reactive disclosure). Secondly, when the public institutions publish information with their own initiative, without a request being filed (proactive disclosure). Proactive disclosure results to proactive transparency which can be achieved using a multiplicity of means ranging from publications and official gazettes, to publicly accessible notice boards, to radio and television announcements, to posting on the Internet via a public institutions' websites.

At present, the Council of Europe Convention on Access to Official Documents is the strongest general provision in international law that refers directly to proactive disclosure. Article 10 of this Convention requires that public authority make public all the information in interest of promoting transparency, and public participation. The Explanatory Report to the

1 'At its own initiative and where appropriate, a public authority shall take the necessary measures to make public official documents which it holds in the interest of promoting the transparency and efficiency of public administration and to encourage informed participation by the public in matters of general interest.' https://rm.coe.int/CoERMPublicCommonSearchServices/Display-DCTMContent?documentId=0900001680084826

Council of Europe Convention on Access to Official Documents elaborates on the classes of information that should be published proactively. Specifically, Article 10, paragraph 72 specifies:

'Public authorities are required by law to publish, on their own initiative, information about their structures, staff, budget, activities, rules, policies, decisions, delegation of authority, information about the right of access and how to request official documents, as well as any other information of public interest. This is done on a regular basis and in formats including the use of new information technologies (for example web pages accessible to the public) and in reading rooms or public libraries, in order to ensure easy, widespread access.'2

Note: The proposed mechanism is the disclosure of information using web pages accessible to the general public, in order to ensure easy, widespread access.

Following the aforementioned mechanism, the objective of this analysis is to gauge the degree of proactive disclosure of public institutions in Kosovo. The methodology for the scorecards included the review of reports on national laws and practices on access to information, as well as the monitoring of 28 websites (19 Ministries

 $^{2\} https://rm.coe.int/CoERMPublicCommonSearchServices/DisplayDCTMContent?documentId=09000016800d3836$

websites, The Office of the Prime Minister website, and the websites of 8 political parties that are in National Assembly), of public institutions, and assessment of the four following categories:

- Fiscal Transparency,
- Access to information of public importance,
- Parliamentary openness and oversight, and
- National Action Plan.

Each category holds a set of information on budget, operations, procurement, and organisation openness of the public institutions. Budget information includes annual budget, and end of the year fiscal reports; operations information comprises of information report on the work of the ministries for the previous year, acts that regulate the work of the ministries, database of acts reviewed by the Parliament, records of public sessions, database of documents related to the oversight function of the Parliament, reports on oversight/audit activities; procurement information covers public procurement plans, calls for tenders, and contract awards/ procedure cancellations; and lastly organisational information are laws and regulations, organograms, staff contact information and high officials biographies.

This scorecard report portrays the performance of public institutions in the four aforementioned categories (Fiscal Transparency, Access to information of public importance, Parliamentary openness and oversight, and National Action Plan) towards fostering open governance. The report assesses the availability of information in all categories, as well as their accessibility and comprehensiveness. After the data on the availability of information were gathered, the data analyst calculated the average level of transparency for each category, for each institution. Finally, in order to reduce the margin of error a re-check of the data gathered was done for all observed institutions. This approach ensured higher level of accuracy while picturing the level of openness of public institutions in Kosovo.

The scorecard report is structured in three parts. The first part of the report provides general overview for the scorecards on open governance, including the assessment of the in-law indicators for open governance in Kosovo. The second part of the report focuses on proactive disclosure assessment, and the assessment of in-practice indicators for open governance in Kosovo. The in-practice measurement draws attention to four categories: 1. Fiscal Transparency, 2. Access to information of public importance, 3. Parliamentary openness and oversight, and 4. National Action Plan. The last part provides conclusions and recommendation.

The Scorecards on open governance

Transparency International defines 'Open Government Scorecard' as a dashboard with an extensive set of in-law and in-practice indicators which assesses whether basic conditions are met to foster open governance around three pillars: (1) transparency, (2) participation and engagement, and (3) control and oversight.³ These three pillars contribute to accountability, responsiveness and efficiency of governments. The general goal of the scorecard is to provide a quick reference guide to the conditions required for open governance and a tool to assess whether basic legal and institutional conditions are met in respective country.

The framework on which the scorecards are designed is as following:

(1) Transparency -

The public right to know what their governments are doing must be recognized as human right, therefore it is crucial to develop policies that fulfill this right, as well as tools and infrastructure to facilitate it's fulfillment;

[In-Law Indicator] In Kosovo, the Law on the Right of Access to Public Documents⁴ recognizes a fundamental right of access to information. Kosovo acknowledges full constitutional recognition of the public right of access to information. Moreover, in Kosovo, the Law on Public Financial Management promotes transparency through obliging the publication of quarterly reports, as well as the national budget along with other explanatory documents in a comprehensive and understandable form.

Open data commitment is known as a tool for promoting transparency. Open data commitments apply to all organizations operating with public funds or performing a public function, including private enterprises and civil society organizations. The Government of Republic of Kosovo has initiated a process to adopt the Open Data Charter.⁵

 $^{3 \}quad http://www.transparency.org.uk/publications/uk-open-gover-nance-scorecard-methodology-description/\\$

http://www.kuvendikosoves.org/common/docs/ligjet/2010-215-eng.pdf

⁵ 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.

(2) Participation and engagement -

The public right to participate and engage in decision-making must be recognized as human right, therefore it is crucial to develop policies that support this right, as well as tools and infrastructure to facilitate it's fulfilment;

[IN-LAW INDICATOR] All public institutions in Kosovo have a constitutional obligation to include citizens in their work, whether in drafting or implementation of their policies and programs. The Article 45 of the Constitution of the Republic of Kosovo states that 'State institutions support the possibility of every person to participate in public activities and everyone's right to democratically influence decisions of public bodies.'

(3) Control and oversight-

The institutional architecture, policies and practices must exist to fulfil these rights and achieve perform control and oversight;

[In-LAW INDICATOR] To have control and oversight means to have the capacity and authority of formal institutions (such as legislatures and supreme audit institutions) to understand and influence how public resources are being raised and spent. The Article 136 of the Constitution of the Republic of Kosovo points that the 'General-Auditor of the Republic of Kosovo is the highest institution of economic and financial control'. 6

While this section covered the in-law indicators for the three open governance pillars, the assessment of the in-practice indicators will be discussed on the coming sections separately. The in-law indicators in itself do not capture the full picture of the open governance, moreover, even relatively strong laws cannot ensure openness if they are not implemented properly. Therefore, the in-practice assessment should complement in-law indicator on the context, power arrangements and institutional conditions of open governance.

http://www.confeuconstco.org/en/congress/congress-XVI/Constitution_ of_the_Republic_of_Kosovo_-_E.pdf

Proactive disclosure assessment

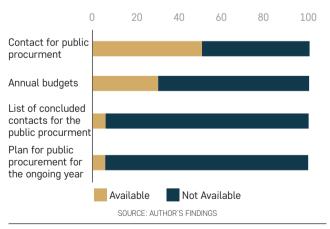
The in-law indicators permitted furthering our inquiry to assess whether the conditions desired to meet a standard were met in-practice for the three pillars of open governance. An assessment whether conditions in line with legal provisions are met in-practice, is done for four categories:

1. Fiscal Transparency, 2. Access to information of public importance, and 3. Parliamentary openness and oversight. Finally, an evaluation of the implementation of the National Action Plan is incorporated as the fourth category of this scorecard report 4. National Action Plan).

1. Fiscal Transparency

From the findings on scorecards, the Kosovo Government publishes end of the year fiscal reports in its website, the report is easily accessible and comprehensive. In contrast, none of the political parties that are in National Assembly publishes annual financial reports on their webpages.

FIG. 01 Overview of avaiability if information on Kosovo institutions'/ministries' websites



As depicted in Figure 1, the majority of ministries do not publish their annual budgets on their websites. From the total 72 percent of them do not publish their annual budgets, whereas only 28 percent do. When it comes to publishing information on public procure-

ment, every institution is obliged to prepare a procurement plan, and submit it to Central Agency of Procurement. Specifically, the Law No. 04/L-042 on Public Procurement specifies:

'1. No less than thirty (30) days prior to the beginning of each fiscal year, each contracting authority shall prepare, in case of a public authority or a public undertaking, submit to the Chief Administrative Officer of the contracting authority, in writing, a preliminary procurement plan that identifies in reasonable detail all supplies, services and works that the contracting authority intends to procure over the course of such fiscal year.'

Originally, the Law on Public Procurement has not set a mandatory requirement for using electronic procurement. However, as of January 2016, the new Law No. 05/L -068 on amending and supplementing the law No. 04/L-042 on Public Procurement of the Republic Of Kosovo, stipulates:

'4. Use of electronic procurement is mandatory in the moment the Government of Kosovo takes a decision on this issue.'

The process of adopting the new amendment of the Law on Public Procurement (i.e. use of electronic Procurement) ended with the decision No. 13/79 of the Kosovo Government. Additionally, September 2016 marks the beginning of the implementation of e-procurement by the contracting authorities in the central level.

Figure 1 shows that from the public procurement set of information, 6 percent of the public institutions/ ministries have published contract awards/ procedure cancellation on their web pages.

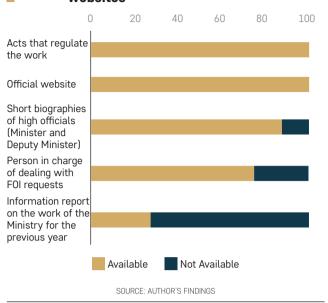
Furthermore, as shown in Figure 1, organizational information are rather available. Roughly, 50 percent of contacts for public procurement are published on public institutions websites. However, a list of concluded contacts still lacks in most of the institutions. Only six percent of institution possess such a substantial list.

2. Access to Information of **Public Importance**

Based on the Right to Information-Rating (RTI) data for the in-law performance, Kosovo is ranked at the 24th position out of 111, and the bases of this rating comes from the measurement of the legal framework, but not its implementation.7 Specifically, the Law on the Right of Access to Public Documents explicitly stipulates that, "1. Every person enjoys the right of access to public documents. 2. Documents of public institutions and organs of state authorities are public, except for information that is limited by law due to privacy, business trade secrets or security classification."8 Therefore, the legal framework (including jurisprudence) recognizes a fundamental right of access to information.

As depicted in Table 1, according to the Comprehensive Report on the achievement of the right to access public documents by public institutions (Annual Report, 2014), the total number of requests for access to public documents at the Government of the Republic of Kosovo and subordinate institutions was 851 requests. Government institutions completely acted on 736 out of the 851 requests received. Moreover, they partly acted on 25 out of the total requests, whereas, 81 requests out of the total were classified as other- which means that a number of the requesters (i.e. 56) were asked to provide further clarifications regarding the requested document, or their request was readdressed to another institution.

FIG. 02 Overview of availability of information on Kosovo institutitions/ministries websites



In the category of Access to Information of Public Importance, Figure 2 shows that for the individual set of information, the least published data are those of operational information. Only around 28 percent of ministries publish the 'Information report on the work for the previous year'. Organizational information, such as 'Person in charge for dealing with FOI requests' and short biographies of high officials (Minister and Deputy Minister)' have somewhat better rating. Respectively, around 80 percent of ministries do publish information (i.e. his/her name, address, contact information) of person in charge for dealing with FOI requests. Moreover, roughly 95 percent of the institutions do publish short biographies of high officials.

TAB. 01 Facts on access to information of public importance

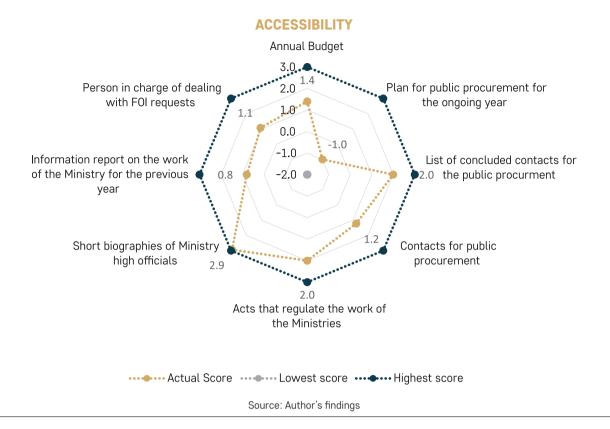
RTI and Access to Information country ranking	21
The number of submitted request	851
The number of requests according to which Commissioner has acted	N/A
The number of cases that Government institutions acted upon the request of the Commissioner	N/A
The number of cases that Government institutions acted completely	745
The number of cases that Government institutions acted partly	25
The number of cases that Government institutions did not act	81

SOURCE: COMPREHENSIVE ANNUAL REPORT, 2014

In some cases, countries with relatively weak laws may nonetheless be very open, due to positive implementation efforts, while even relatively strong laws cannot ensure openness if they are not implemented properly.

http://www.rti-rating.org/view_country/?country_name=Kosovo

FIG. 03 Ranking of transparency information based on average accessibility scores for two categories (Fiscal Transparency and Information of Public Importance)



2.1 ACCESSIBILITY AND COMPREHENSIVENESS OF AVAILABLE INFORMATION

Accessibility and comprehensiveness, means that all support materials available to public officials involved in a decision-making process must be made available to the general public. Key data and analysis should be presented in a form that is accessible and comprehensible to citizens. The scale to which the rating of the accessibility and comprehensiveness is measured ranges on a scale of -2 to 3 points (a score of -2 means lowest rate, and a score of three means highest rate of accessibility/ comprehensiveness).

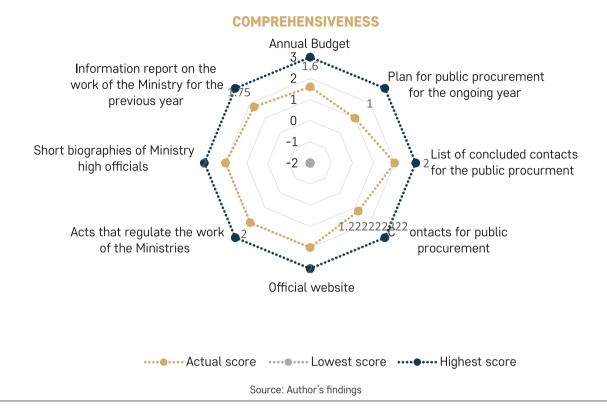
2.1.1 Accessibility

A measure of accessibility for the available materials in institutions websites shows that organizational information are rated with higher scores, whereas with the lowest score are rated the information on plans for public procurement. More specifically, the radar chart illustrates the ease of accessibility on fiscal documents, operational information, procurement plans, and organizational information.

Budget is one of the most important documents for each of the governmental institution. The average accessibility rating of the annual budget on the public institutions as shown in Figure 3, measured on a scale of -2 to 3 points, is at a score of 1.4, which means that only basic budget transparency exists for those institutions that do publish budget information (only 28 percent of public institutions do publish annual budgets). Looking at the individual set of information, the least published information has to do with public procurement. Even though all of the government institutions have the public procurement plans, none of them publishes it online on their web pages, except for the Ministry for the Kosovo Security Force which has procurement documents (such as contract procedures/ procedure cancellations) available on its website, though not very easy accessible. As such, plans for public procurement are missing in most of the public institutions9, the accessibility of public procurement information is rated with -1 points (in ministries websites), which means that often ministries do not make available even basic information on public procurement. In the public procurement category, scorecards find that one can access contacts for public procurement,

⁹ From the interviews with officials from Public Procurement departments of the public institutions (i.e. ministries), the author reveals that Plans for Public Procurement should be published in the Public Procurement Regulatory Commission)

FIG. 04 Ranking of transparency information based on average comprehensiveness scores for two categories (1) Fiscal Transparency and (2) Information of Public Importance



and the lists that are concluded with the contacts for the public procurement can be useful as they do provide substantial information on their websites.

As depicted in the Figure 3, organizational information and documents have the highest level of accessibility. In the line with contacts for public procurements, there is high level of accessibility for person in charge of dealing with FOI requests, and short biographies of ministry high officials.

Moreover, Figure 3 shows that acts that regulate the work of the ministries have 2 points of accessibility, as highly rated for being easily accessible and very transparent, and in the other hand information report on the work of the ministry for the previous year is the least published information among those with public interest, and even those that are published lack accessibility.

2.1.2 Comprehensiveness

From the budget information, operational information (information reports on the work of ministries), procurement information, and organizational information that are available on public institutions websites, and rather accessible, their comprehensiveness does not vary a lot from one another. Figure 4 shows the level of comprehensive of annual ministries' budget, which on average it has a score of 1.6 points (which means somewhat high level of comprehensiveness).

The best rating for comprehensiveness is given for four sets of information: 1) Official website; 2) Acts that regulate the work of the Ministries; 3) Short biographies of Ministry high officials; and 4) List of concluded contacts for the public procurement, (i.e. operational and organizational information), as these four sets of information include more detailed information. On the other hand, the lowest rate is given for public procurement information, which means that even the very few institutions which publish public procurement information, these data available on ministries websites lack comprehensiveness.

The average comprehensiveness of all information in the two categories (1) Fiscal Transparency, and (2) Information of Public Importance, measured on a scale -2 to 3, is 1.7 points, which means that in overall the set of information available to public have a moderate level of comprehensiveness, and adequate information for public understanding.

3. Parliamentary **Openness and Oversight**

The data gathered for this category present an overview of availability of parliamentary information. For this part of the study, in order to get the exact information whether the data is available or not, the survey was designed using dichotomous questions, which included only two possible answers - Yes or No. The Kosovo's Assembly webpage¹⁰ holds information on composition of the assembly, members, and the scope of activities. For each member of the assembly an individual profile is published on the website; excluding individual results from the public voting of MPs for the current composition.

Website contains operational information such as: current agenda of the parliament, database of acts reviewed by the parliament, records of public sessions, database of documents related to the oversight function of the parliament (e.g. hearings, investigations, parliamentary questions). However, the webpage does not include any report on oversight/ audit activities undertaken by parliamentary committees.

Finally, from the organizational information the assembly's website also includes clear information of the person in charge of dealing with freedom of information (FOI) requests.

3.1 Accessibility and Comprehensiveness of Parliamentary information

The scorecard observation on parliamentary openness and oversight covers the assessment of the information accessibility and comprehensiveness.

TAB. 02 Overview of availability of parliamentary information

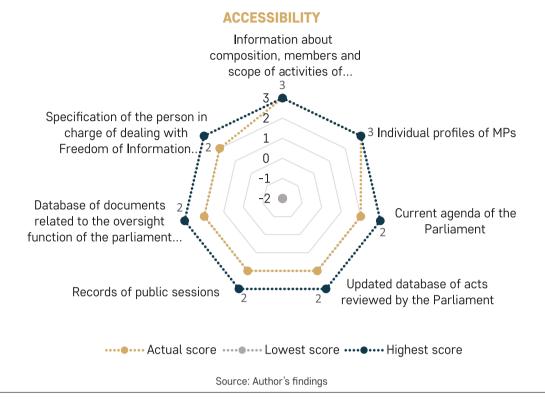
Composition, members and scope of activities	Yes	
Individual profiles of MPs	Yes	
Individual results from public voting of MPs for the current composition		No
Current agenda of the parliament	Yes	
An updated database of acts reviewed by the parliament	Yes	
The records of public sessions	Yes	
Database of documents related to the oversight function of the parliament (e.g. Hearings, investigations, parliamentary questions, etc.)	Yes	
The person in charge of dealing with freedom of information (FOI) requests	Yes	
Reports on oversight/audit activities undertaken by parliamentary committees		No
SOURCE: AUTHOR'S FINDINGS	••••••	•••••••

3.1.1 Accessibility

The ranking of transparency information based on average accessibility scores for Parliamentary Openness and Oversight category is rather high. As shown in Figure 5, Information about composition, members and scope of activities of parliamentary committees, and individual profiles of MP's are fully accessible, and therefore ranked with 3 points of accessibility. Other information such as: current agendas of the Parliament, updated database of acts reviews by the Parliament, records of public sessions, database related to oversight, and contacts for FOI are assessed by 2 points of accessibility (maximum being 3). In here as-well, in regards to organizational information the level of accessibility rate is high, with a slight decrease of accessibility rate on operational information.

¹⁰ http://www.kuvendikosoves.org/?cid=2,1

FIG. 05 Ranking of transparency information based on average accessibility scores for Parliamentary Openness and Oversight category



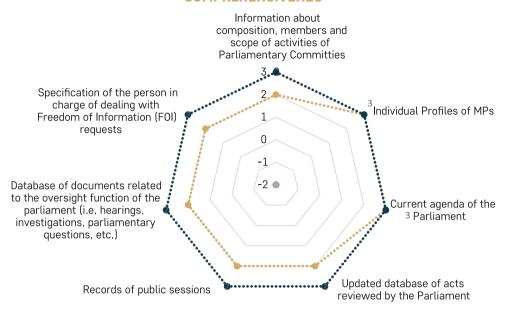
3.1.2 Comprehensiveness

The ranking of transparency information based on average comprehensiveness scores for Parliamentary Openness and Oversight category delivers positive results. Figure 6 shows that in the organizational information there are two sets that are ranked with 2 points of comprehensiveness (maximum being 3); that is information about composition, members and scope of activities of the Kosovo's assembly, and specifications of the person in charge of dealing with Freedom on Information (FOI) requests. With the same score are ranked three sets of operational information; respectively, database of documents related to the oversight function of the Parliament, records of public sessions, and updated database of acts reviewed by the Parliament.

Maximum score of comprehensiveness is given to one set from operational information, and one from organisational information (i.e. individual profiles of MPs, and current agenda of the Parliament).

FIG. 06 Ranking of transparency information based on average comprehensiveness scores for Parliamentary Openness and Oversight category

COMPREHENSIVENES



Source: Author's findings

4. OGP Country Action Plan and Implementation

The Ministry of European Integration was authorised to select and chair a working group comprised from private sector, civil society and other relevant stakeholders. This working group was created to first of all draft the OPG Action Plan for 2014-2016. This action plan was adopted in April, 2014. The inclusion of civil society in drafting the action plan was through an email call, to which not everyone had access, but the ones that were included in the group email. The results from our findings reveal that the process of drafting an action plan was not transparent in itself. Neither the comments/ suggestions received during the consultation process were published by the ministry in charge, thereof Ministry of European Integration. The Riinvest Institute has done the monitoring of the implementation of the

actions set in the National Action Plan. The Riinvest's monitoring report reveals that, only one action out of 42 was fully completed.11

Following the unsuccessful implementation of National Action Plan 2014-2016, Kosovo has been rejected to join the Open Government Partnership, Regardless, the Government of Republic of Kosovo has initiated a process to adopt the Open Data Charter. The responsible authorities to coordinate the implementation of the Open Data Charter will be the Ministry of European Integration and the Ministry of Public Administration.

TAB. 02 OGP Country Action Plan and Implementation

Has the Action Plan for the ongoing period been adopted?	Yes
Which was the deadline for the adoption of the Action Plan?	2016
When it was adopted?	April, 2014
Has the civil society been included in drafting the Action Plan(s) (public debates, consultations, possibility of contributing and sending comments, etc.)?	Yes
Was it a call to civil society to participate in the drafting of the Action Plan available publicly?	No
Was it easily accessible?	No
In what way the Ministry in charge sent an invitation for participation in the drafting of the Action Plan:	by email/mail, by phone
Does the method call civil society to participate in the drafting of the action plan is regulated by law/ordinance? – Yes/No	No
What is the prescribed method?	
Has the Ministry in charge published a list of comments/suggestions received during the consultation process?	No
Is it easily accessible?	
Is it comprehensive?	
Has the Ministry in charge published a list of explanations why rejected suggestions have not been adopted?	No
Is it easily accessible?	
Is it comprehensive?	
Has there been a media campaign promoting OGP?	No
Was it intensive?	-

Source: Author's findings

http://www.riinvestinstitute.org/publikimet/pdf/Raporti_i_Monitorimit1419261410.pdf

Conclusion and Recommendation

This scorecard analysis, which is used as an instrument that assesses the degree of proactive disclosure of public institutions in Kosovo, suggests that in-law performance of open governance in Kosovo outscores the in-practice performance. The national laws and commitments of the Kosovo Government towards creating a more transparent, participatory, and accountable society seems guite promising. However, this promising legal framework cannot ensure openness if it is not implemented properly. In some cases, countries with relatively weak laws may nonetheless be very open, due to positive implementation efforts.

The assessment done for the purpose of the scorecard report in the four following categories: 1) Fiscal Transparency, 2) Access to information of public importance, 3) Parliamentary openness and oversight, and 4) National Action Plan, gives us a low in-practice performance of Kosovo public institutions towards open governance, with exemption of organizational set of information. Each category included a set of information on budget, operations, procurement, and organisation openness of the public institutions.

The least disclosed information are those of public procurement, followed by budgetary information, and then operational information. Rather good in-practice performance is recorded for organizational information. Specifically, only 6 percent of the public institutions disclose procurement information on their web sites (mainly information that have to do with contract awards/ procedure cancellation, whereas none of the ministries publishes the plan for public procurement. Moreover, the majority of ministries (72 percent) do not publish their annual budgets on their websites. At the same level of openness are the operational information, only around 28 percent of ministries publish the operational information. Organizational information have somewhat better rating. Respectively, around 80 percent of ministries do publish organizational information (i.e. names, addresses, contact information) of person in charge for dealing with FOI requests. Moreover, roughly 95 percent of the institutions do publish short biographies of high officials.

When measuring the accessibility and comprehensiveness rate for the set of information for these categories: (1) Fiscal Transparency and Information of Public Importance, and (2) Parliamentary Openness and Oversight category we find the following, the following is concluded.

For the (1) Fiscal Transparency and Information of Public Importance category, public procurement data are rated with the lowest scores, followed by operational information, budget information, and with slight higher scores for organizational information. The comprehensiveness rating is a little different on the order, first with the lowest rating comes procurement information, followed by budgetary information, operational information, and with higher scores for organizational information.

Moreover, accessibility scores for disclosed information on the (2) Parliamentary Openness and Oversight category are rather satisfactory. Specifically for the set of operational information which are rated a little bit lower that organizational information, whereas procurement and budgetary information are not included in this category. Similar performance is shown for the comprehensiveness of organizational and operational information, when again procurement and budgetary information are not included.

In-law improvement is needed by promoting not only access to information but also proactive disclosure through including a specific proactive provisions in the right of access to information law. The law should give due consideration to how information will be structured, organized, edited, and when and where it will be disclosed. These considerations lead to a number of recommendations including that information should be organized and published so that it is: available, findable, relevant, comprehensible, free or low cost, and up-to-date. When setting up or improving proactive disclosure schemes, public bodies should ensure that they are well-resourced, progressive, promoted (within government and to the public), comprehensively monitored, and properly enforced.

Finally, the study suggests that in order to complement the in-law indicators with the in-practice ones each ministry should publish the information on budget, operations, procurement, and organisation in order foster open governance, and contribute to accountability, responsiveness and efficiency of governments of the public institutions. Specifically, annual budget, and end of the year fiscal reports should be public as budget information. From the operations information the following document should be accessible from the public: information report on the work of the ministries for the previous year, acts that regulate the work of the ministries, database of acts reviewed by the Parliament, records of public sessions, database of documents related to the oversight function of the Parliament, reports on oversight/audit activities. Moreover, each ministry should publish procurement information; which includes public procurement plans, calls for tenders, and contract awards/ procedure cancellations. And lastly, enrich organisational information though publishing all laws and regulations, organograms, completed staff contact information and high officials biographies.

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- 22. Ministry of Justice, RKS 2015, 2016, available at: <www.md-ks.net/>
- 23. Ministry of Labour and Social Welfare, RKS 2015, 2016, available at: https://mpms.rks-gov.net/
- 24. Ministry of Local Government Administration, RKS 2015, 2016, available at: https://mapl.rks-gov.net/
- 25. Ministry of Public Administration, RKS 2015, 2016, available at: http://map.rks-gov.net/
- 26. Ministry of Trade and Industry, RKS 2015, 2016, available at: <www.mti-ks.org/ >

This publication is the result of the project Advocacy for Open Government, which is being implemented in six Western Balkans countries: Albania, Bosnia and Herzegovina, Montenegro, Macedonia, Serbia and Kosovo.



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This publication is funded by the European Union





Published by:
RIINVEST INSTITUTE
Lidhja e Prizrenit nr. 42
Prishtinë 10000, Republika e Kosovës
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www.riinvestinstitute.org