



Index of Active Transparency 2021

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2021 Index of Active Transparency

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Abbreviations

MoI	Ministry of Interior
MoE	Ministry of Economy
MESP	Ministry of Environment and Spatial Planning
MoH	Ministry of Health
MAFWE	Ministry of Agriculture, Forestry and Water Economy
MISA	Ministry of Information Society and Administration
MoC	Ministry of Culture
MLSG	Ministry of Local Self-Government
MFA	Ministry of Foreign Affairs
MoD	Ministry of Defence
MES	Ministry of Education and Science
MoJ	Ministry of Justice
MPSICR	Ministry of Political System and Inter-Community Relations
MTC	Ministry of Transport and Communications
MLSP	Ministry of Labour and Social Policy
MoF	Ministry of Finance
RNM	Republic of North Macedonia

Summary

- In 2021, active transparency of line ministries, the government and municipalities is calculated at **63%** (from maximum possible 100%) and according to the categorization of compliance rates falls within the category of “good” active transparency. In 2021, active transparency **has been improved by 5 percentage points** (from 58% to 63%).
- On average, **line ministries and the government** have published **79%** of required information, which accounts for **minimum improvement compared to last year** when active transparency score among ministries was 77%.
- For the fifth consecutive year, **municipalities** demonstrate lower active transparency compared to ministries, which is calculated at **60%** and implies an **improvement by 5.5 percentage points** compared to last year.
- **For the first time** since this index was established (2016 onwards), as many as **two institutions are assigned a score of maximum 100%**, meaning that they have published all information required. These are the **Ministry of Defence** which held the top rank last year and municipality **Karposh**, ranked third under the last year’s index.
- Among **planning regions**, the **East** holds the top rank for a second year in a row (with a score of 74%), while the bottom rank is still occupied by the **Skopje Region** (with a score of 49 %).
- Line ministries publish **the least information on finances** (only 60% from possible 100%), while municipalities publish the least information in respect to their competences (42% from possible 100%).
- As regards **freedom of information requests** addressed to all institutions on the same day and with identical inquiries, the average response rate among **municipalities** accounts for **17 days** (last year it was 24 days), while **ministries** responded within an average period of **16 days** (last year it was 26 days). **61%** of institutions have responded within the **law-stipulated deadline** of 20 days, while **39%** of them responded beyond this deadline, **thus acting in violation of the law**.

The term ‘active transparency’ means publication of information by institutions on their own initiative, without being addressed with freedom of information requests. However, active transparency is stipulated as legal obligation, primarily under the Law on Free Access to Public Information, but also in other laws, such as the Law on Local Self-Government, Law on Budgets, Law on Public Debt, Law on Financing Local Self-Government Units, etc. In addition to legal regulations, active transparency arises from good practices and institutions are obliged to proactively publish information under the Open Government Partnership’s National Action Plans.

Introduction: Why active transparency?

The term “active transparency’ means publication of information by institutions on their own initiative, without being addressed with freedom of information requests. On the other hand, ‘reactive transparency’ concerns cases in which the institutions are addressed with requests to disclose particular information.

The need for proactive publication of information arises from the fact that it implies public disclosure and availability of:

- » information about the authorities’ regulations and decisions, thereby ensuring the right of citizens to be informed about their rights and responsibilities in the society;
- » information needed by citizens to hold the authorities accountable;
- » information needed by citizens to participate in decision-making processes, and
- » information needed by citizens to obtain access to services provided by public institutions.

Institutions that proactively publish information enjoy multiple benefits from such practices, as follows:

- » active transparency helps the institutions to be more responsible in public spending;
- » by engaging in active transparency, institutions promote the principles of good governance and integrity; and
- » institutions are more efficient because they better manage information at their disposal.

It seems that technology development and advancement go hand-in-hand and support active transparency of institutions because the methods for distribution of information disposed by institutions and useful for citizens are growing in number and become more easily accessible.

The legal basis for active transparency is found in the Law on Free Access to Public Information. In addition to the obligation for institutions to respond to freedom of information requests, this law also contains provisions on proactive publication of information, i.e. publication of information on their own initiative.

Furthermore, a series of other laws stipulate obligations for the institutions to proactively publish information. They include provisions from the Law on Local Self-Government, Law on Budgets, Law on Public Debt, Law on Financing Local Self-Government Units, etc.

In addition to legal regulations, active transparency also arises from the practice. Worldwide, it is believed a good practice when the institutions make publicly available to all citizens their responses to frequently asked questions submitted as freedom of information requests.

Voluntary publication of information helps civil society organizations and investigative journalists to develop and publish research studies/stories which, in turn, allow citizens to better understand performance and operation of relevant institutions, their rights

and responsibilities, the manner in which they can influence decisions that affect their day-to-day life and work, and facilitate citizens' access to services provided by the state.

In principle, institutions can proactively publish all information at their disposal, except for those that are regulated as exemptions by law.

Active transparency is a relatively new notion in the world. Hence, there are no predefined standards about which information should be published by the institutions, except for those regulated as exemptions by law. However, analysis of relevant practices from different countries indicates to certain minimum information which the institutions should publish as part of their active transparency.

When they engage in proactive publication of information, institutions should be guided by the principle that disclosure of information is cost-effective and efficient, i.e. information disclosed is easily accessible to the broadest group of citizens possible. Moreover, honest active transparency means that the institutions inform citizens and interested parties about information disclosed and encourage access to and use of such information.

Proactively published information should be easily accessible and understandable, useful, relevant (relevancy of information could be confirmed in cooperation with civil society organizations and journalists) and regularly updated.

Based on all this, the Center for Civil Communications developed a detailed methodology for comprehensive research that measures the level of active transparency demonstrated by state institutions. The idea behind this research and ranking of the institutions under the so-called Index of Active Transparency is to help institutions in terms of which information they need to publish and to encourage them to make such information publicly available.

Methodology

This research is conducted on the basis of previously designed methodology and structured questionnaires that measure compliance rate with obligations for proactive publication of information on official websites of analysed institutions.

The legal basis for questionnaire design is identified in legal obligations for the institutions in various areas of operation that are relevant for citizens and affect their life and work. In that regard, due consideration was made of obligations arising from the Law on Free Access to Public Information and those arising from other laws that govern public spending.

This research is conducted for the sixth consecutive year and targets institutions that are direct holders of executive powers at central and local level, i.e. the government, ministries and local authorities, i.e. municipalities and the City of Skopje.

Having in mind the multitude of obligations related to proactive publication of information by the authorities at central and local level (municipalities have far greater obligations in this regard), the research is conducted on the basis of two questionnaires. One questionnaire targets line ministries and the government, while the other is intended for local self-government units, i.e. municipalities and the City of Skopje. In that, the questionnaire intended for the Ministry of Finance includes additional questions to reflect multiple obligations related to information disclosure by this ministry compared to the others.

Each question is assigned a particular number of points (weight), depending on the importance, volume and scope of information published on official websites of ranked institutions. In addition to measuring the institution's compliance with publication of information covered under the questionnaire, the research also includes a testing probe, i.e. submission of freedom of information requests to all institutions covered by the research in order to assess their performance in respect to timely and complete disclosure of information requested. The maximum number of points that can be assigned to ministries and the government is 48, while the Ministry of Finance could be assigned maximum 58 points, while in the case of municipalities and the City of Skopje, the maximum number of points is 74.

The initial research was conducted in the period from 22nd March to 9th April 2021. The final ranking of institutions was made on the basis of their compliance rate with obligations (expressed as percentage), i.e. the index of active transparency, which is calculated as the ratio between the number of points awarded and the maximum number of points. In that, a score of 0 signifies the lowest rank, while a score of 100 signifies the highest rank.

The scale of active transparency is divided into five categories depending on the relevant compliance rate. Hence, institutions with compliance rate of 80% to 100% are ranked as "very good", those with compliance rate of 60% to 80% belong to the category of "good", institutions with compliance rate of 40% to 60% are categorized as "average", those with compliance rate of 20% to 40% are ranked as "poor", and those with compliance rate of 0% to 20% are ranked as having "very poor" active transparency.

Overall ranking under the 2021 Index of Active Transparency

Rank	Institution	Score
VERY GOOD		
1	Ministry of Defence	100.0%
1	Karposh	100.0%
3	Kriva Palanka	95.7%
4	Ministry of Finance	94.4%
5	Valandovo	94.3%
6	Government of RNM	93.5%
7	Veles	93.1%
7	Kochani	93.1%
9	Demir Hisar	93.0%
10	MES	91.7%
11	Bitola	91.4%
12	Delchevo	90.0%
13	Ministry of Justice	89.1%
14	Berovo	88.6%
14	Kumanovo	88.6%
16	Ministry of Health	87.5%
17	Ministry of Interior	87.0%
18	Shtip	86.1%
19	Gevgelija	85.7%
20	Vasilevo	84.1%
21	MESP	83.3%
21	МНОА	83.3%
23	Konche	82.6%
24	Ohrid	81.9%
25	Kavadarci	80.6%
26	Strumica	80.0%
GOOD		
27	Gazi Baba	79.7%
27	Makedonska Kamenica	79.7%
27	MLSP	79.2%
30	Bogdanci	78.6%
31	Gradsko	78.3%
32	MTC	77.1%
32	MLSG	77.1%
34	Vinica	74.3%
35	City of Skopje	73.9%
36	Makedonski Brod	73.2%
37	Ministry of Culture	72.9%
38	Debrca	72.5%
39	Sveti Nikole	72.2%
40	Centar	71.8%
41	Pehchevo	71.4%
42	Zrnovci	71.0%
43	Ministry of Economy	70.8%
44	Gjorche Petrov	70.4%
45	Krushevo	70.0%
46	MAFWE	69.6%
46	Aerodrom	69.6%
48	Petrovec	69.0%
48	Chaska	69.0%
50	Vevchani	68.6%

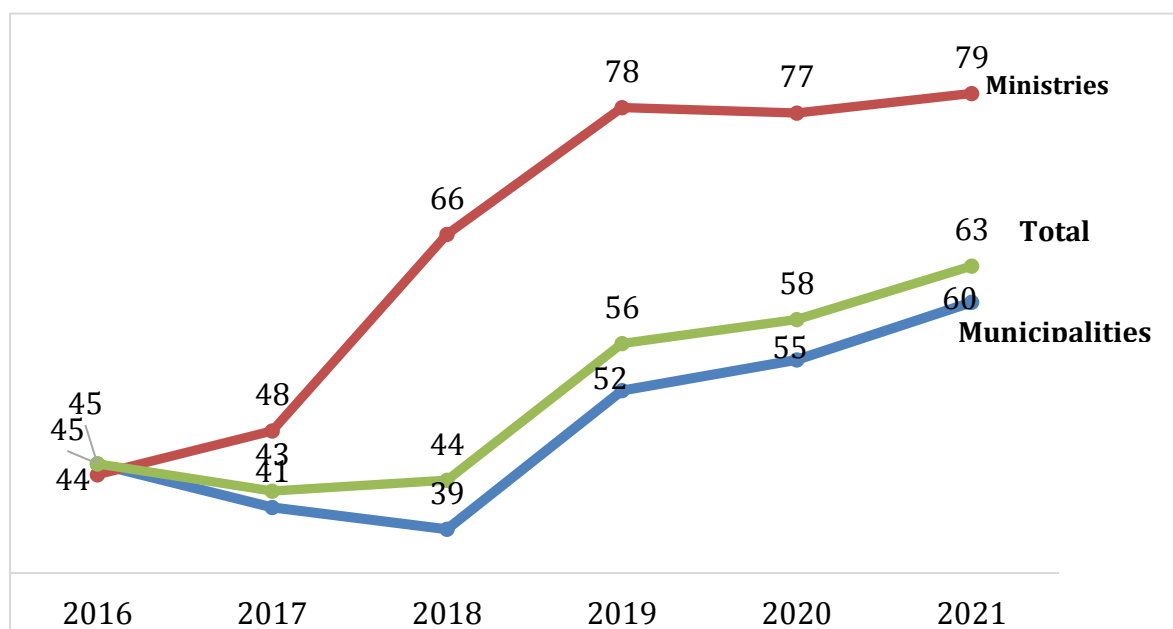
Rank	Institution	Score
51	Novo Selo	67.1%
51	Tetovo	67.1%
53	Mogila	66.7%
54	Zhelino	65.2%
55	MFA	64.6%
56	Prilep	64.3%
57	Gostivar	63.9%
58	Cheshinovo-Obleshevo	63.8%
59	Kratovo	62.9%
60	Bosilovo	62.3%
61	Resen	61.4%
AVERAGE		
62	Kisela Voda	59.2%
63	Brvenica	58.6%
64	Probishtip	57.1%
64	Radovish	57.1%
66	Dolneni	56.5%
67	Centar Zhupa	55.1%
68	Debar	54.3%
69	Negotino	52.8%
70	Jegunovce	52.2%
71	Mavrovo and Rostushe	49.3%
72	Struga	47.2%
73	Bogovinje	47.1%
74	Ilinden	46.4%
74	Rankovce	46.4%
74	Shuto Orizari	46.4%
77	Kichevo	45.7%
78	Dojran	44.9%
78	Krivogashtani	44.9%
80	Novaci	43.5%
81	Karbinci	42.0%
POOR		
82	Demir Kapija	37.7%
83	Lozovo	36.2%
83	Sopishte	36.2%
85	Butel	31.9%
85	Rosoman	31.9%
85	Chair	31.9%
88	MPSICR	28.3%
89	Saraj	28.2%
90	Tearce	26.1%
91	Studenichani	21.1%
VERY POOR		
92	Zelenikovo	14.5%
92	Staro Nagorichane	14.5%
94	Arachinovo	13.0%
94	Chucher Sandevo	13.0%
96	Lipkovo	11.6%
97	Vrapchishte	10.1%
97	Plasnica	10.1%

Detailed analysis of active transparency in 2021

For the first time in six years, proactive publication of information by the institutions, i.e. their active transparency score, has moved from “average” to “good” on the scale of compliance rates.

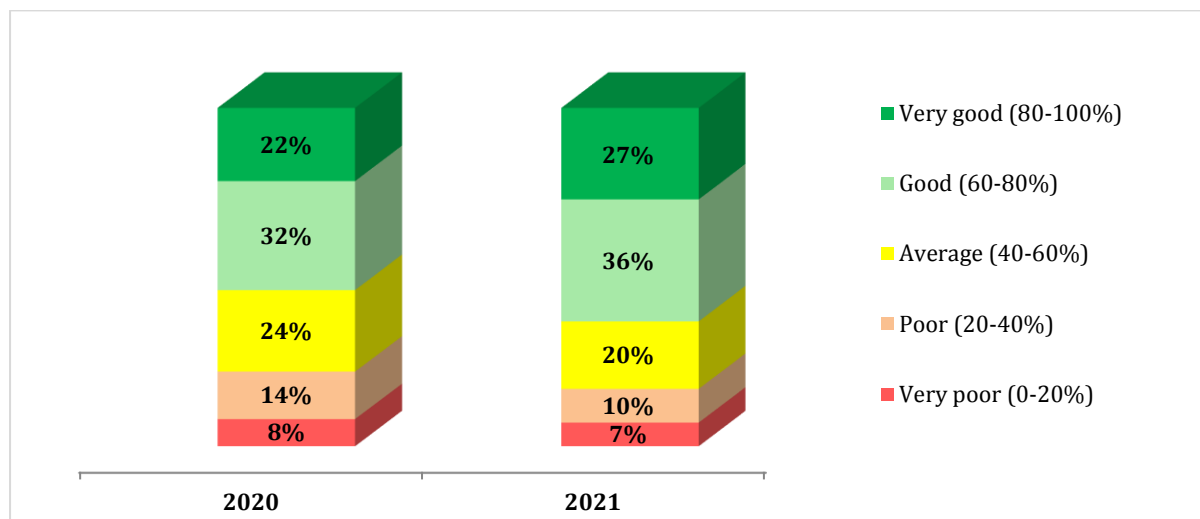
- In 2021, the average active transparency of all 98 targeted institutions is calculated at 63% (from maximum possible 100%) and for the first time falls under the category of “good” active transparency on the scale of compliance rates. From the start of this index (2016 onwards) and until last year, the average transparency of all institutions ranged from 44% to 58%, falling under the category of “average” compliance rate.
- In 2021, active transparency is calculated at 63%, implying an improvement by 5 percentage points compared to last year when it accounted for 58%.
- Ministries continue to publish more information compared to municipalities. Active transparency of ministries stands at 79%, while it is calculated at 60% among municipalities, although back in 2016 both groups of institutions had an equal starting point, i.e. a compliance rate of 45%. Hence, the gap between active transparency demonstrated by ministries and the government and that of municipalities remains wide.

Movement of active transparency scores throughout the years



- This year, more than half of institutions fall under the two best categories of “good” and “very good” active transparency. On that account, the number of institutions ranked under the remaining three groups of poorer compliance rates (“average”, “poor” and “very poor”) is decreased.

Distribution of institutions per different categories of active transparency



Active transparency of municipalities: at last, one municipality demonstrates active transparency performance of 100%; improvements are noted with 51 municipalities, but they are also featured in bottom-ranked positions

- After a one-year impasse, one municipality (Karposh) is again featured in the top positions on the ranking list of institutions by having demonstrated an active transparency score of 100%.
- Another municipality (Kriva Palanka) is featured on the third position in the overall ranking. The group of institutions marked by the best active transparency scores (“very good”), i.e. compliance rate of 80% to 100% with obligations for publishing information, includes as many as 17 municipalities among 26 institutions ranked. Last year, this group included 14 municipalities.
- With the exception of one ministry, municipalities hold the last 43 positions on the ranking list, i.e. they account for all institutions ranked in the two weakest groups marked by “poor” active transparency (compliance rate of 20% to 40%) and “very poor” active transparency (compliance rate of 0% to 20%).
- This year, 51 municipalities have improved their transparency scores unlike the situation observed last year when improvement was noted with 70 of them. Leaders, i.e. institutions that have improved their active transparency score by more than 20 percentage points, are Konche (by 59 points), Petrovec (by 57 points), Gradsko (by 45 points) and Centar Zhupa (by 42 points).

Active transparency of ministries and the government: after a year of stagnation, growth is noted again, albeit minimal

- The general level of active transparency among ministries and the government is increased by 2 percentage points from 77% last year to 79% this year.

- Among 16 line ministries and the government, as many as 12 institutions have demonstrated increase in terms of their compliance rate with active transparency obligations, 3 of them showed decrease, while 2 have identical scores with those calculated last year.
- Ministry of Defence is the best-ranked with a score of 100% and tops the ranking list of all 98 institutions. This ministry is also the first institution to have scored a maximum compliance rate of 100 % since the introduction of this ranking list in 2016.
- The biggest annual improvement is noted with the most recently formed Ministry of Political System and Inter-Community Relations which had scored 0% last year (when it did not have an official website) and earned an active transparency score of 28% this year.
- The government and the Ministry of Finance replaced each other in their respective ranks, and now the second position is held by the Ministry of Finance, pushing the government to the third place. They are followed by the Ministry of Education and Science and the Ministry of Justice. Although marked by the highest annual increase, the last position in this group of institutions is held by the Ministry of Political System and Inter-Community Relations.
- Nine ministries are featured in the best ranking group of “very good” active transparency (compliance rate of 80% to 100%), and seven are categorized as having “good” active transparency (compliance rate of 60% to 80%). Only one ministry is featured in the group of “poor” active transparency (compliance rate of 0% to 20%).

Ranking of ministries according to their active transparency

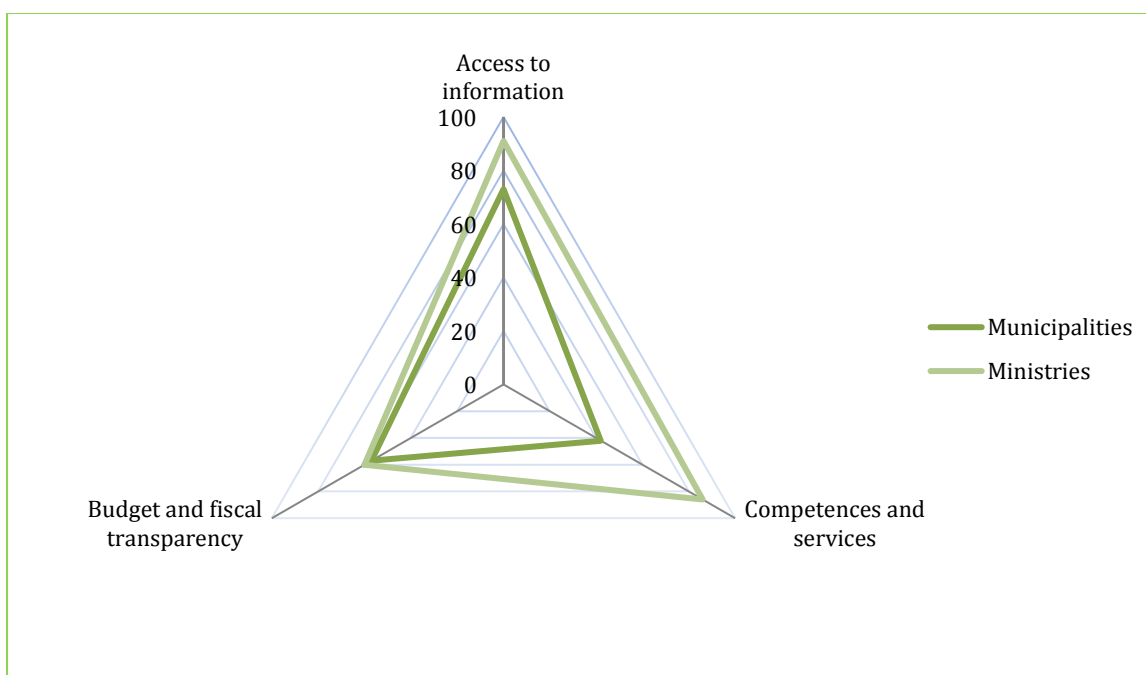
Rank	Overall rank	Institution	2021 score	2020 score	Change (in percentage points)
1	1	Ministry of Defence	100.0%	97.9%	2.1
2	4	Ministry of Finance	94.4%	85.2%	9.2
3	6	Government of RNM	93.5%	83.3%	10.2
4	10	Ministry of Education and Science	91.7%	70.8%	20.9
5	13	Ministry of Justice	89.1%	72.9%	16.2
6	16	Ministry of Health	87.5%	81.3%	6.2
7	17	Ministry of Interior	87.0%	85.4%	1.6
8	21	Ministry of Information Society and Administration	83.3%	83.3%	0
8	21	Ministry of Environment and Spatial Planning	83.3%	72.9%	10.4
10	27	Ministry of Labour and Social Policy	79.2%	79.2%	0
11	32	Ministry of Local Self-Government	77.1%	72.9%	4.2
11	32	Ministry of Transport and Communications	77.1%	62.5%	14.6
13	37	Ministry of Culture	72.9%	56.3%	16.6
14	43	Ministry of Economy	70.8%	72.9%	-2.1

15	46	Ministry of Agriculture, Forestry and Water Economy	69.6%	81.3%	-11.7
16	55	Ministry of Foreign Affairs	64.6%	75.0%	-10.4
17	88	Ministry of Political System and Inter-Community Relations	28.3%	0.0%	28.3
		AVERAGE	79.4%	77.1%	

The least information is published in respect to competences and finances

- Both ministries and municipalities published the most information in the area of access to public information.
- On the contrary, the least information is published on issues related to competences (in the case of municipalities) and those related to budgets and finances (in the case of ministries).
- In the area of **access to information**, the compliance rate among municipalities with obligations for active publication of this type of information, which mainly arise from the Law on Free Access to Public Information, accounts for 73% (last year it was 67%), while ministries and the government demonstrate a significantly higher compliance rate of 91% (last year it was 88%).
- In the area of **information on competences and services**, municipalities have an average compliance rate of 42% (last year it was 36%), and ministries have a compliance rate of 86 % (last year it was 89%).
- In respect to active publication of information in the area of **budget and financial transparency**, municipalities demonstrate a compliance rate of 57% (last year it was 36 %) and ministries – 60% (last year it was 42%).

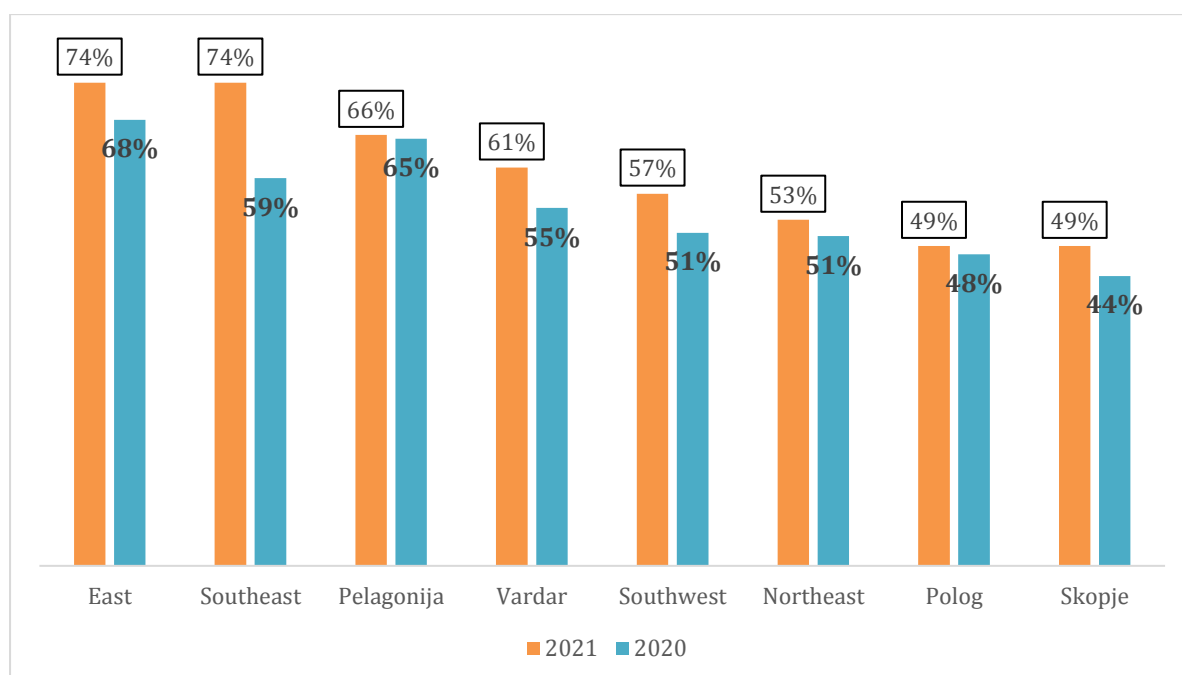
Active transparency per area of information



Regional comparison: the East Region maintains its top-ranking position for the third consecutive year, while the Skopje Region stays at the bottom

- All eight regions in the country have improved their active transparency scores in 2021, although in the case of some regions the improvement is only minimal.
- For the third consecutive year, the first place is held by the East Region, which has increased its compliance rate from 68% last year to 74% this year.
- The Pelagonija Region, which used to be a leader, descended from the second place last year to the third place this year, having improved its average active transparency score by only 1 percentage point.
- The second position on the ranking list of active transparency is now held by the Southeast Region, which has improved its transparency from 59% to 74%, i.e. by whole 15 percentage points in the course of one year, accounting for the highest leap among all planning regions.
- There are no changes in respect to the bottom position, which for years is held by the broader Skopje Region, on the account that municipalities within this region publish only 48.7% of all information required. Although the overall active transparency score for this region is increased by 5 percentage points compared to last year, it is still insufficient to overtake the second to last Polog Region, which has a score of 48.8% this year, improved by only 1 percentage point from last year.
- The middle ranks (fourth, fifth and sixth positions) are held by the same regions as last year, under the same order: Vardar (61%), Southwest (57%) and Northeast (53%).

Ranking of regions according to active transparency



East Region - 74 % (last year - 68 %)

- For the third year in a row, the East Region maintains its leader position in terms of active transparency with an average compliance rate of 74%, accounting for an improvement by 6 percentage points from last year.
- Makedonska Kamenica lost its top position within the region, which it has held for the last two years. Kochani emerged as the new leader with high compliance rate of 93%, followed by Delchevo, Berovo and Shtip, all of which are better ranked than Makedonska Kamenica, which now holds the fifth position.
- Both this and last year, the bottom rank is held by Karbinci, with 42% compliance rate with obligations. Although Karbinci has improved its score from last year by 13 percentage points, such improvement proved to be insufficient to climb up the ranking list from its bottom position.

Active transparency of municipalities in the East Region

Rank	Municipality	Score
1	Berovo	89%
2	Kochani	93%
3	Delchevo	90%
4	Shtip	86%
5	Makedonska Kamenica	80%
6	Vinica	74%
7	Pehchevo	71%
8	Zrnovci	71%
9	Cheshinovo-Obleshevo	64%
10	Probishtip	57%
11	Karbinci	42%

Southeast Region - 74 % (last year - 59 %)

- Year after year, the Southeast Region is continuously improving its rank, from fourth, to third position last year, and to second position this year, having increased its active transparency score by 5 percentage points.
- This year as well, i.e. for the second year in a row, the top position is held by Valandovo, which in 2018 was ranked the last in this region, but has been continuously improving its active transparency over the last three years. In that period, its compliance rate with obligations on publishing information has increased from 59% to 94%, and this municipality also holds the fifth position in the overall ranking list.
- The former leader in the region, Gevgelija, after having dropped to the fourth position last year, has again resumed the second rank, pushing down Strumica from second to fifth position.

- From the bottom rank last year, Konche has climbed to the fourth position, having improved its active transparency score by fantastic 60 percentage points, from 23% last year to 83% this year. From the penultimate rank last year, Dojran had dropped to the bottom of the list within this region, in spite of having improved its transparency by 19 percentage points.

***Active transparency
of municipalities in the Southeast Region***

Rank	Municipality	Score
1	Valandovo	94%
2	Gevgelija	86%
3	Vasilevo	84%
4	Konche	83%
5	Strumica	80%
6	Bogdanci	79%
7	Novo Selo	67%
8	Bosilovo	62%
9	Radovish	57%
10	Dojran	45%

Pelagonija Region - 66 % (last year - 65 %)

- A former leader among regions and second ranked for the last two years, in 2021 the Pelagonija Region dropped to the third position according to its active transparency score. Compared to last year, the region is marked by a minimum improvement of 1 percentage point. Nevertheless, it is still categorized in the group of “good” active transparency, with an average compliance rate above 60%.
- Bitola lost its long-standing top position despite having improved its active transparency score from 88% last year to 91% this year. The new leader in the region is Demir Hisar, with high compliance rate of 93%. This municipality was second ranked, and then shared the top position with Bitola, and has finally broke at the top of the ranking list alone.
- As was the case last year, Krushevo maintained its third position, while Mogila took over the fourth position from Prilep, which dropped to the fifth position. No changes are noted in respect to the bottom two positions, held by Krivogashtani and Novaci.

***Active transparency
of municipalities in the Pelagonija Region***

Rank	Municipality	Score
1	Demir Hisar	93%
1	Bitola	91%
3	Krushevo	70%
4	Mogila	67%
5	Prilep	64%
5	Resen	61%

7	Dolneni	57%
8	Krivogashtani	45%
9	Novaci	43%

Vardar Region - 61 % (last year - 55 %)

- The Vardar Region maintained its fourth position on the regional ranking list. No changes are noted to the leader position in this region, held by the Municipality of Veles. The situation is identical in respect to the second position, held by Kavadarci, although both municipalities have lost one percentage point each.
- Gradsko has significantly improved its active transparency score in 2021 and from the second to last position emerged on the high third position in the region, having improved its active transparency by whole 45%.
- Rosoman remains on the last position in the region, as its active transparency score has decreased by 1 percentage point compared to last year.

Active transparency of municipalities in the Vardar Region

Rank	Municipality	Score
1	Veles	93%
2	Kavadarci	81%
3	Gradsko	78%
4	Sveti Nikole	72%
5	Chashka	69%
6	Negotino	53%
7	Demir Kapija	38%
8	Lozovo	36%
8	Rosoman	32%

Southwest Region - 57 % (last year - 51 %)

- This year as well, the Southwest Region holds the fifth position among regions in terms of active transparency. Ohrid's top position is uncontested, despite having demonstrated minimal improvement compared to last year. No change is noted in respect to the second position, held by Makedonski Brod, although this municipality's active transparency score has slightly worsened.
- Centar Zhupa broke out from the last two positions held in the past years and climbed towards the middle of the ranking list, i.e. holds the fifth position, with an improved active transparency from 13% to 55%.
- The bottom position is now held by Plasnica, whose last year's score has been additionally decreased by 10%, and is now featured at the bottom of the ranking list comprised of 98 institutions.

Active transparency of municipalities in the Southwest Region

Rank	Municipality	Score
1	Ohrid	82%
2	Makedonski Brod	73%
3	Debrca	72%
4	Vevchani	69%
5	Centar Zhupa	55%
6	Debar	54%
7	Struga	47%
8	Kichevo	46%
9	Plasnica	10%

Northeast Region - 53 % (last year - 51 %)

- The Northeast Region also maintained its sixth position, where it landed last year after having moved up one rank.
- No changes are noted in respect to top four positions within this region. Kriva Palanka is still the leader, after it has assumed this position last year. With an active transparency score of 96%, this municipality is also the second best municipality in the country.
- Firmly placed on the second position is Kumanovo, which has improved its active transparency from last year by new 6 percentage points.
- Next are Kratovo and Rankovce, while the bottom and second to bottom ranks are exchanged, whereby Staro Nagorichane moved up one place and now the bottom position belongs to Lipkovo.

Active transparency of municipalities in the Northeast Region

Rank	Municipality	Score
1	Kriva Palanka	96%
2	Kumanovo	89%
3	Kratovo	63%
4	Rankovce	46%
5	Staro Nagorichane	14%
6	Lipkovo	12%

Polog Region - 49 % (last year - 48 %)

- After having dropped to the seventh, penultimate position among the regions last year, the Polog Region maintains this inglorious rank.
- Tetovo took over the top position held by Gostivar for several years, having improved its active transparency score by 9 percentage points. Zhelino climbed to the second position with an improved active transparency by as many as 22 points.

- Tearce and Vrapchishte remained in the last two positions and both municipalities still belong to the category of “poor” active transparency. Vrapchishte holds the second to last position in the overall ranking list that covers all 98 institutions.

***Active transparency
of municipalities in the Polog Region***

Rank	Municipality	Score
1	Tetovo	67%
2	Zhelino	65%
3	Gostivar	64%
4	Brvenica	59%
5	Jegunovce	52%
6	Mavrovo and Rostushe	49%
7	Bogovinje	47%
8	Tearce	26%
9	Vrapchishte	10%

Skopje Region - 49 % (last year - 44 %)

- For a third year in a row, the biggest region in the country, i.e. the Skopje Region, holds the bottom position among regions in respect to activities transparency demonstrated by its municipalities. Karposh kept its top position in the region and broke out to the first position among all 98 ranked institutions, having earned a score of maximum 100%.
- No changes are noted to the second position, still occupied by Gazi Baba. Centar and the City of Skopje exchanged their ranks, whereby the later improved its rank by one position and is now third, while Centar dropped to the fourth position.
- Gjorche Petrov leaped to the fifth rank, while Aerodrom remained in the same position from last year, when it was sixth ranked.
- A true winner this year is Petrovec, which held the bottom position last year with an active transparency score of only 12% and has climbed up by ten positions to the seventh rank with high 69% this year.
- Same municipalities remained at the bottom of the ranking list, with Chucher Sandevo being the worst ranked municipality, preceded by Arachinovo and Zelenikovo, with 13% and 14% respectively, from possible 100 %.

***Active transparency
of municipalities in the Skopje Region***

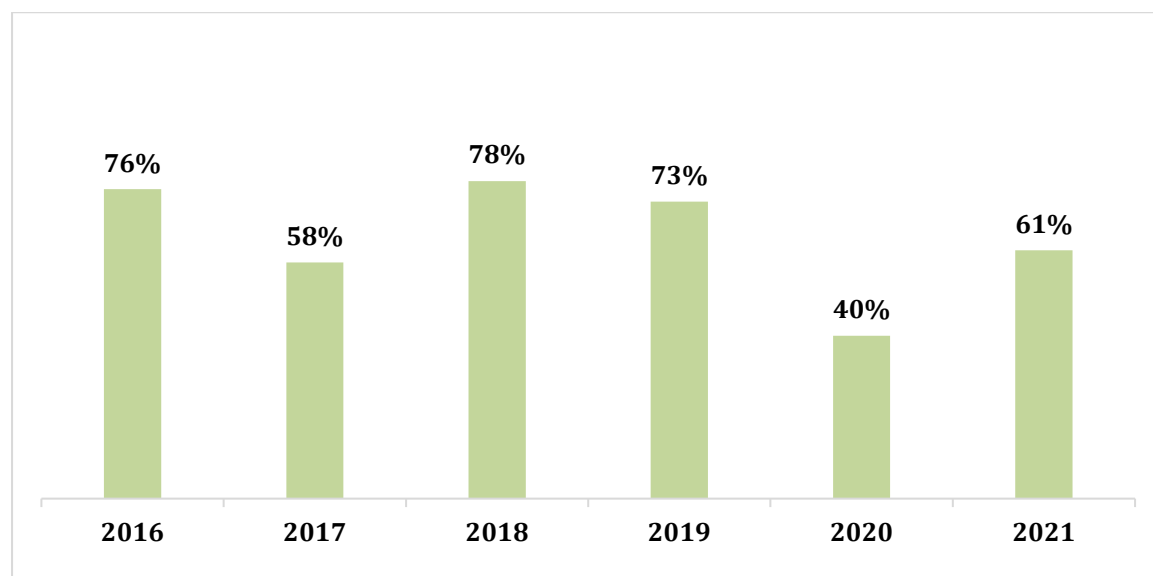
Rank	Municipality	Score
1	Karposh	100%
2	Gazi Baba	80%
3	City of Skopje	74%
4	Centar	72%

5	Gjorche Petrov	70%
6	Aerodrom	70%
7	Petrovec	69%
8	Kisela Voda	59%
9	Ilinden	46%
10	Shuto Orizari	46%
11	Sopishte	36%
11	Butel	32%
13	Chair	32%
14	Saraj	28%
15	Studenichani	21%
16	Zelenikovo	14%
17	Arachinovo	13%
18	Chucher Sandevo	13%

On average, the institutions responded to freedom of information requests within a period of 16 days, but only 61% of them have submitted their responses within the law-stipulated deadline

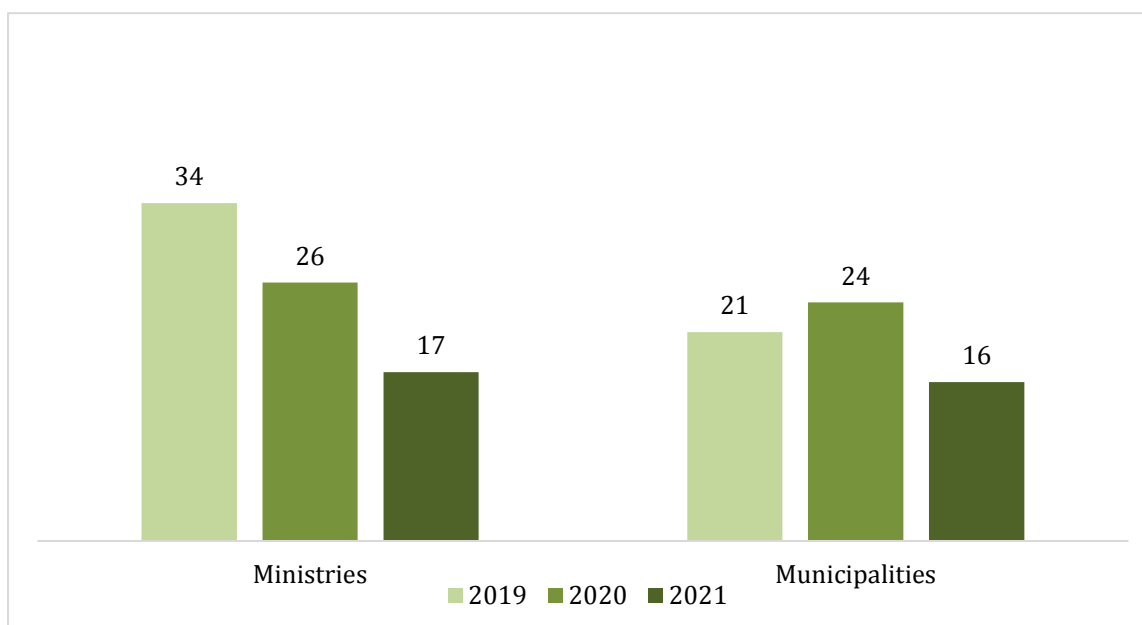
- On average, the institutions responded to freedom of information requests they have been presented on the same day and with identical inquiries within a period of 16 days, i.e. 4 days before expiration of the law-stipulated deadline.
- However, only 61% of them submitted their responses within the law-stipulated deadline of 20 days, while the remaining 39% submitted their responses beyond this deadline. Last year, only 39% of institutions had complied with the deadline for disclosing requested information, indicating a certain improvement in this regard.

Responses to freedom of information requests within the law-stipulated deadline (all institutions)



- Municipalities have a better track record than ministries in respect to the average number of days for submission of their responses, but also in respect to the share of FOI requests responded within the maximum law-stipulated deadline. On average, municipalities have responded to FOI requests within a period of 16 days, while this period among ministries accounts for 17 days. The share of responded FOI requests within the law-stipulated deadline is calculated at 62% among municipalities and at 59% among ministries.
- FOI requests were not responded by 4% of institutions, same as the share noted last year.
- The fastest response rate is observed with one municipality and accounts for one day, while the longest response rate of 48 days is observed with another municipality.

Average number of days for disclosure of requested information



Winners and losers

- As many as 62 from the total of 98 institutions covered in this research have improved their active transparency score in 2021 compared to 2020.
- The biggest individual improvement is observed with Konche (59%), Petrovec (57%), Gradsko (45%) and Centar Zhupa (42%).
- On the other hand, 33 institutions have published less information compared to last year, while 3 institutions do not show improvement or deterioration in respect to their active transparency score.
- Among line ministries, the biggest improvement is observed with the Ministry of Political System and Inter-Community Relations, but only because last year this

ministry did not have own website, and with the Ministry of Education and Science (21%).

Annual change in active transparency scores (2021/2020)

Institution	Change (in percentage points)		Institution	Change (in percentage points)
Konche	59.4%		City of Skopje	2.9%
Petrovec	57.4%		Tearce	2.9%
Gradsko	45.0%		Saraj	2.8%
Centar Zhupa	42.4%		Butel	2.5%
MPSICR	28.3%		Chair	2.5%
Zhelino	21.7%		Ministry of Defence	2.1%
Chashka	21.1%		Ohrid	1.6%
MES	20.9%		MoI	1.6%
Novo Selo	20.7%		Negotino	0.7%
Shtip	19.9%		Radovish	0.6%
Dojran	18.8%		Resen	0.5%
Ministry of Culture	16.6%		Vevchani	0.5%
Vinica	16.3%		Kavadarci	0.3%
Ministry of Justice	16.2%		Centar	0.0%
Kochani	14.8%		MISA	0.0%
MTC	14.6%		MLSP	0.0%
Sveti Nikole	14.5%		Kichevo	-0.7%
Mogila	13.1%		Jegunovce	-0.7%
Karbinci	13.0%		Gostivar	-0.9%
Bogdanci	12.4%		Kratovo	-0.9%
Bosilovo	11.6%		Krushevo	-1.0%
Gjorche Petrov	10.4%		Veles	-1.3%
MESP	10.4%		Makedonski Brod	-1.4%
Berovo	10.3%		Rosoman	-1.4%
Government of RNM	10.2%		MoE	-2.1%
Zelenikovo	10.2%		Prilep	-2.4%
Sopishte	10.1%		Lipkovo	-2.9%
Aerodrom	9.3%		Probishtip	-3.8%
Ministry of Finance	9.2%		Debar	-3.8%
Tetovo	9.1%		Strumica	-4.1%
Gevgelija	8.9%		Novaci	-4.3%
Valandovo	8.8%		Chucher Sandevo	-4.4%
Debrca	8.7%		Dolneni	-4.4%
Karposh	8.6%		Gazi Baba	-4.4%
Struga	7.8%		Kisela Voda	-5.1%
Delchevo	7.4%		Plasnica	-5.8%
Ministry of Health	6.2%		Krivogashtani	-5.8%

Kumanovo	6.0%		Demir Kapija	-5.8%
Kriva Palanka	5.8%		Makedonska Kamenica	-6.2%
Vasilevo	5.8%		Bogovinje	-6.5%
Shuto Orizari	5.0%		Mavrovo and Rostushe	-8.4%
Pehchevo	4.7%		Studenichani	-8.5%
Demir Hisar	4.6%		Arachinovo	-9.9%
Staro Nagorichane	4.4%		Vrapchishte e	-10.2%
Rankovce	4.4%		MFA	-10.4%
MLSG	4.2%		Ilinden	-11.6%
Brvenica	3.5%		MAFWE	-11.7%
Cheshinovo –Obleshevo	3.2%		Zrnovci	-13.5%
Bitola	3.0%		Lozovo	-14.5%

Appendices: Research questionnaire

1. Questionnaire on active transparency for ministries and the government

First group of questions: access to information

1. Does the institution's website have separate section on free access to information?
2. Has the institution published basic contact information for the officer responsible for access to information (name and surname, telephone and e-mail)?
3. Has the institution published the method for submission of freedom of information requests?
4. Has the institution published the list of information at its disposal?
5. Has the institution published basic contact information for the information holder (address, telephone and e-mail)?

Second group of questions: responsibility, accountability and integrity

6. Has the institution published data about the minister (biography, contract info, etc.)?
7. Has the institution published the list of employees/heads of departments and sectors with contact info?
8. Has the institution published its organizational structure (scheme, organogram)?
9. Has the institution published contact information for the officer responsible for protected internal reporting (name and surname, telephone and e-mail)?
10. Does the institution publish press-releases and/or newsletters or any other format for information dissemination?

Third group of questions: information on competences and services

11. Has the institution published information on its competences?
12. Has the institution published the laws that regulate its competences?
13. Has the institution published the regulations it adopts as secondary legislation?
14. Has the institution published its strategy plan and/or work strategy?
15. Has the institution published its annual plan and/or work program for the current year?

Fourth group of questions: budget and financial transparency

- 16. Has the institution published its budget for the current year?
- 17. Has the institution published its final budget account for the previous year?
- 18. Does the institution publish its audit reports?
- 19. Has the institution published its annual plan for public procurements in the current year?
- 20. Does the institution publish notices for public procurements in the current year?
- 21. Does the institution publish notifications on signed contracts for public procurements?

**Additional questions for the Ministry of Finance
(pertaining to the fourth group of questions: budget and financial transparency)**

- 22. Does the institution publish monthly reports on budget execution in the current year?
- 23. Does the institution publish semi-annual report on budget execution for the first six months of the previous year?
- 24. Does the institution publish data on public debt of RNM for the previous or the current year?

Deadline in which the institution responded to the freedom of information requests

2. Questionnaire on active transparency for municipalities and the City of Skopje

First group of questions: access to information

1. Does the institution's website have separate section on access to information?
2. Has the institution published basic contact information for the officer responsible for free access to information (name and surname, telephone and e-mail)?
3. Has the institution published the method for submission of freedom of information requests?
4. Has the institution published the list of information at its disposal?
5. Has the institution published basic contact information for the information holder (address, telephone and e-mail)?

Second group of questions: responsibility, accountability and integrity

6. Has the institution published data about the mayor (biography, contact info, etc.)?
7. Has the institution published the list of employees/heads of departments and sectors with contact information?
8. Has the institution published its organizational structure (scheme, organogram)?
9. Has the institution published contact information for the officer responsible for protected internal reporting (name and surname, telephone and e-mail)?
10. Does the institution publish press-releases and/or newsletters or other formats for information dissemination?
11. Has the institution published the municipal statute?
12. Does the institution publish the municipal bulletins?
13. Does the institution publish meeting agendas for the municipal council?

Third group of questions: budget and financial transparency

14. Has the institution published its budget for the current year?
15. Has the institution published its final budget account for the previous year?
16. Does the institution publish the so-called civil budget?
17. Does the institution publish quarterly reports on budget execution for the previous year?
18. Does the institution publish its audit reports?
19. Has the institution published its annual plan for public procurements in the current year?

20. Does the institution publish notices for public procurements in the current year?
21. Does the institution publish notifications on contracts signed for public procurements?

Fourth group of questions: information on competences and services

22. Has the institution published information on its competences?
23. Has the institution published the laws that govern its competences?
24. Has the institution published the regulations it adopts as secondary legislation?
25. Has the institution published the services it provides?
26. Does the institution publish DUP/GUP (information on urban planning)?
27. Does the institution publish information on urban planning (construction permits)?
28. Does the institution publish information on environmental protection?
29. Does the institution publish information on local economic development?
30. Does the institution publish information on public utilities?
31. Does the institution publish information on culture?
32. Does the institution publish information on sports and recreation?
33. Does the institution publish information on social protection and child protection?
34. Does the institution publish information on education?
35. Does the institution publish information on healthcare?
36. Does the institution publish information on civic protection and rescue measures?
37. Does the institution publish information on firefighting protection?
38. Does the institution publish information from supervision on performance of its competences?
39. Has the institution published information on the property tax rates stipulate by the municipality?
40. Has the institution published information on fees charged for utility connection of construction land?

Deadline in which the institution responded to freedom of information requests