

HOW MUCH ARE MONTENEGRIN LOCAL SELF-GOVERNMENTS (NON)TRANSPARENT?



- ANALYSIS OF TRANSPARENCY OF THE WORK OF
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Analysis of transparency of the work of 23 local self-governments in Montenegro -

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INTRODUCTION

The public administration system in Montenegro is undergoing reform interventions for decades with the aim of harmonizing with the best European standards and practices, which should, among other things, make public administration more accessible to citizens. An important parameter of improving public administration work is transparency, which is also the focus of this research.

In assessing the level of transparency of local self-governments, two cross section points were chosen. **The first** is a crosscheck of manner of local self-governments' resolving issues and their one-year performance in resolving requests for free access to information, with proceedings upon complaints that have arisen as a result of initiated and cases which have been resolved unfavourably for the party, including those relating to the administration silence, therefore, in accordance with the Law on Free Access to Information these data were requested from all local self-governments. **The second cross-cutting point** is an assessment to which extent the 23 local self-governments' websites in Montenegro contain information that must be accessible to citizens under the provisions of Article 12 of the Law on Free Access to Information¹.

Transparency of work of local self-governments in Montenegro chronically represents one of the weaker points of the system. There is a high degree of tolerance to non-compliance with the provisions of the Law on Free Access to Information by authorised bodies, there are also numerous different interpretations of the same provisions of this Law by the officials who deal with the requests, and inadequate staff solutions are notable with the ever-increasing administration silence. All this causes a large number of complaints filed to the Agency for Personal Data Protection and Free Access to Information, which itself as well, due to a lack of staff, has the problem of resolving cases within a reasonable time. The latest amendments to the Law on Free Access to Information that have further restricted access to information and closed the system by giving discretionary right to managers of bodies to mark documents as business or tax secret without providing a deadline stating the reasons for restricting access to information, are consequently cumulatively strengthening a rather low degree of transparency of work of local self-governments.

The Strategy of Public Administration Reform in Montenegro 2016-2020 recognizes a reduced level of transparency in processes such as conducting public procurement,

¹ Article 12, Paragraph 1 of the Law on Free Access to Information of Montenegro ('Official Gazette of Montenegro', no. 044/12, 030/17) prescribes: *The public authority shall publish on its website following information: 1) the access to information guide; 2) public registries and public records 3) programmes and work plans; 4) reports and other documents on work and state of play in areas within their competence; 5) drafts, proposals, and final texts of strategic documents, plans and programmes for their implementation; 6) draft and proposal of laws and other regulations, as well as opinions of experts delivered in relation to drafts and proposals for legislation; 7) single acts and contracts on use of financial resources originating from public revenues and of state-owned property; 8) list of civil servants and state employees with their titles; 9) list of public officials and pay lists for them, as well as list of other incomes related to exercise of public function; 10) Decisions and other single acts that are of importance to rights, duties, and interests of third parties; 11) Information to which the access was granted upon request.*

budgeting and recruiting new staff. The same problems are also pointed out by the European Commission's Report on Montenegro² for 2018 and the Report on Implementation of Action Plan for implementation of Chapter 23 for period January-June 2018³. Thus, the key planned activities are aimed at *improving transparency in the planning process, the adoption of acts and their implementation with the respect of the principle of participation⁴ and establishment of a transparent public procurement procedure in accordance with the Law on Public Procurement⁵*. The SIGMA Monitoring Report on Montenegro also warns about the problem of non-availability of data on employees and their earnings, which is part of a proactive publication of data⁶.

This paper provides a cross section of the observed parameters along with basic guidelines as to how to overcome some of the identified problems related to (non) transparency of local self-governments. The first part deals with the manner of resolving of local self-governments' bodies and overview of the data obtained as per requests for free access to information sent to local self-governments, after which availability of data on websites of municipalities was processed in detail in comparison with the application of Article 12 of the Law on Free Access to Information. From this, conclusions and key recommendations for improvement of the existing system were made.

2 Available on: <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20180417-montenegro-report.pdf>

3 Government of Montenegro, Report on Implementation of the Action Plan for Realization of Chapter 23, January-June 2018, p. 264

4 Government of Montenegro, Report on the Implementation of the Action Plan for Realization of Chapter 23, January-June 2018, p. 264 and 98.

5 Government of Montenegro, Report on the Implementation of the Action Plan for Realization of Chapter 23, January-June 2018, p. 264 and 104.

6 OECD, SIGMA, Monitoring report: The Principles of Public Administration, Montenegro, November 2017, p. 68.

METHODS OF LOCAL SELF-GOVERNMENTS' CONDUCT IN PROVIDING INFORMATION TO CITIZENS

The research team of **CCE has been able to acquire responses** to submitted requests for free access to information from 17 municipalities: **Andrijevica, Bar, Berane, Bijelo Polje, Danilovgrad, Herceg Novi, Kolasin, Kotor, Mojkovac, Petnjica, Pljevlja, Pluzine, Ulcinj, Savnik, Zabljak and Cetinje**. Regarding **the Capital City of Podgorica**, responses were provided by Golubovci Municipality, Tuzi⁷ Municipality, Secretariat for Self-Local Government, Secretariat for Finances, Secretariat for Communal Affairs, Secretariat for Youth and Social Welfare and Secretariat for Culture and Sport. The request was not answered by the Cabinet of the Mayor, the Secretariat for Spatial and Urban Planning and Environmental Protection and the Directorate of Local Public Revenues, and the request was rejected by the Property Administration. Local self-governments **that did not submit responses are as follows: Gusinje, Plav, Rozaje and Tivat, and Budva and Niksic denied access to required information.**

When it comes to data collection, 17 municipalities that provided the answer⁸ and part of the information submitted by the bodies of the Capital City of Podgorica, are the ones that are covered by this research.

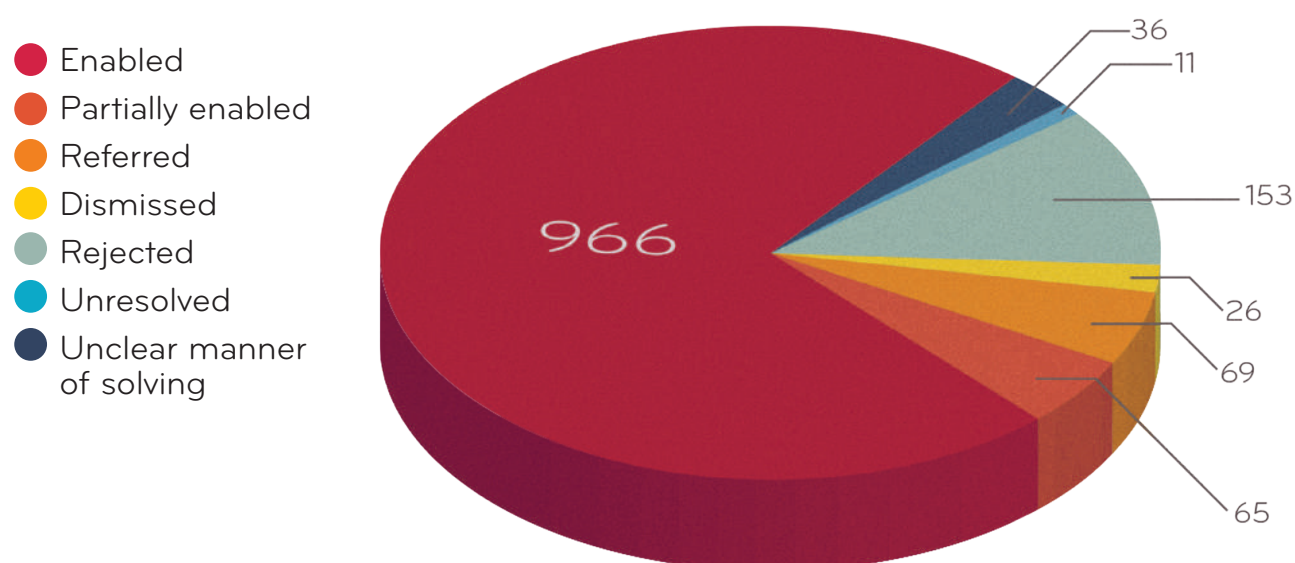
In the period from 1/1/2017 to 1/1/2018, 16 local self-governments and the Capital City of Podgorica received **1326** requests for free access to information, of which **1279 (96.46%)** have been resolved in some of the ways provided by law, **11 (1.28%)** of the requests are unresolved, while for **36 (2.71%)** requests, the method of resolving remained unknown.

The Law on Free Access to Information stipulates that the submitted requests for free access to information *may be resolved by granting access to the requested information, partially granting access to the requested information, referring to the resolution of another (authorised) body, rejecting or discarding the request.*

Local self-governments approved **966 (73%)** requests, partially approved **65 (5%)** requests, while **69 (5%)** requests were forwarded to other bodies. **153 (11%)** requests were rejected and **26 (2%)** requests were discarded. **11 (1%)** requests remained unsolved, and **36 (3%)** had an unclear method of solving.

⁷ Municipality Tuzi was a part of Capital City Podgorica until 1 September 2018, and since that date it is independent municipality.

⁸ In further processing of data, municipalities that denied request for free access to information are not included.



Graphic 1. Graphic representation of resolving of 16 local self-governments and the Capital Podgorica

In the new model of local action plans, which was prepared by the Union of Municipalities in March 2017, measures *Provision of implementation of the Law on Free Access to Information and Trainings of employees resolving upon requests for free access to information* were included. The Law on Free Access to Information has been in force since 2012, and accordingly local bodies have had to know and respect the same since then. The law provides development of guidelines for free access to information and forms for submitting requests, as well as their regular updating. However, even after six years of application, there is a lot of planning but less work on implementation of this Law, and there is a lack of adequate sanctioning of those local self-governments that directly violate these provisions, which consequently has a negative impact on quality of work of local self-governments.

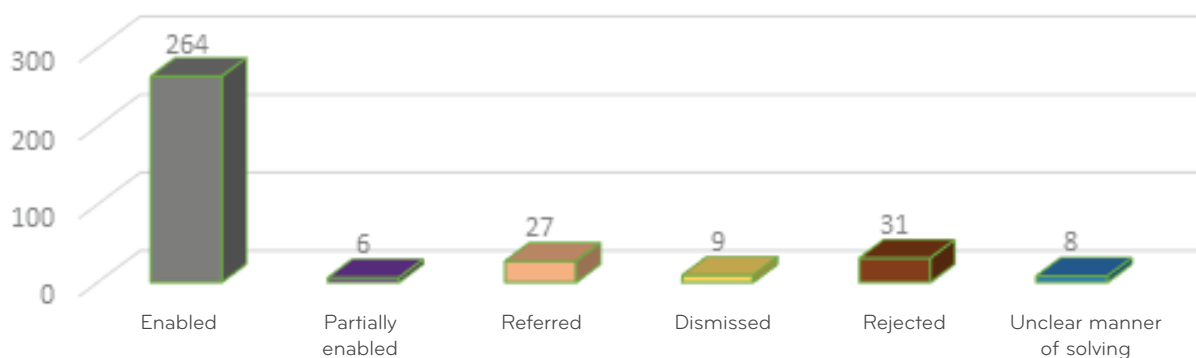
Municipality	To allow access	To partially allow access	To refer to another body	To discard request	To reject request
Andrijevica	19	0	1	0	5
Bar	71	4	13	0	6
Berane	60	3	0	3	10
Bijelo Polje	46	11	1	1	15
Danilovgrad	19	0	9	3	1
Herceg Novi	264	6	27	9	31
Kolasin	20	3	0	0	5
Kotor	190	0	2	2	17
Mojkovac	20	3	1	0	1

Petnjica	23	0	0	0	0
Pljevlja	60	12	0	5	39
Pluzine	5	3	0	1	4
Podgorica ⁹	102	9	11	0	8
Ulcinj	7	0	0	0	0
Savnik	6	5	0	0	4
Zabljak	23	6	4	2	1
Cetinje	31	0	0	0	6
	966	65	69	26	153

Table 1. The manner of resolving upon requests for free access to information of 16 local self-governments and the Capital Podgorica

Of the local self-governments who submitted response to the sent request, Herceg Novi has had the highest number of received requests, while Ulcinj has had the smallest number of received requests.

The Municipality of **Herceg Novi** received **345 requests for free access to information** during 2017, of which access was allowed to 264 requests, access to the 6 requests was partially allowed, 27 requests were sent to the other body for solving, 9 requests were discarded and 31 rejected, while for 8 requests the method of solving is unknown.



Graphic 2. Graphic representation of resolving of Municipality of Herceg Novi during 2017

The smallest number of requests in the period from 1/1/2017 to 1/1/2018 had Municipality **Ulcinj with 7 requests**, to which access was allowed.

The manner of resolving is quite harmonized in all municipalities, and allowing the access to information remains the most dominant manner of resolving, while others are far less represented.¹⁰ The issue of quality of information that the applicants receive on the basis of submitted requests has not been in the focus of this but requires a separate research. Also, there remains the issue of charging costs of the proceedings, which in some cases are unjustifiably high and could be reduced by the use of electronic communication means.

⁹ Part of bodies of the Capital City of Podgorica provided answers – Municipality of Golubovci, Municipality of Tuzi, Secretariat for Local Self-Government, Secretariat for Finances, Secretariat for Communal Affairs, Secretariat for Youth and Social Welfare and Secretariat for Culture and Sport. These data were cumulatively provided in this table.

¹⁰ This research did not go into the content of requests or answers, but only the „flow“ of the system, i.e. the openness of local self-governments to provide information from formally-legal aspect.

CONDUCT OF SECOND INSTANCE BODY UPON COMPLAINTS

The SIGMA monitoring report finds that the Agency for Protection of Personal Data and Free Access to Information has begun to monitor the proactive access to data in March 2017, but without the real possibility of imposing sanctions, which is why this monitoring is of limited scope¹¹. The protection procedure before the Administrative Inspection is, due to limited capacities of this inspection, also ineffective, thus this channel of protection and sanctioning of those who violate this law seems useless and the system is deprived of the most effective mechanism for democratic control of the government.

Data available to local self-governments indicate that against them, in the period from 1/1/2017 until 1/1/2018, and **74 complaints** were filed. This represents **5.58%** of the total number of received requests or **5.78%** in relation to the requests that have been resolved in some manner.

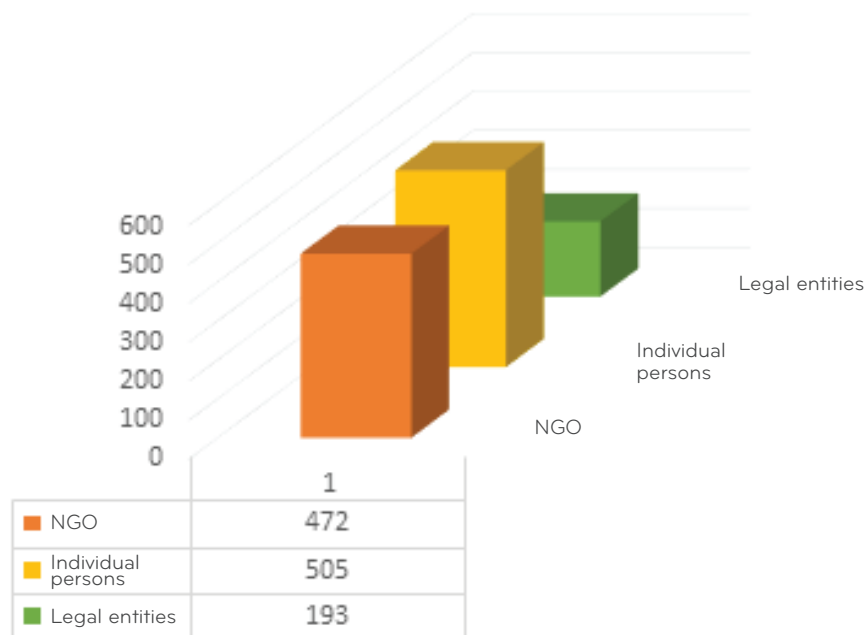
In 2017, the Agency received 4862 complaints, and for 3880 a decision or a conclusion was made. Of total of 18 inspections carried out over the implementation of the Law on Free Access to Information, none have been implemented in some local self-government¹². **The Agency does not keep records of incoming complaints by bodies or local self-governments**, thus consequently their data for the purpose of this research have been left out. It is also evident that the second-instance body is also suffering from the consequences of 'backlog' due to non-compliance with the provisions of the Law on Free Access to Information by the first instance bodies, in this case local self-governments.

11 OECD, SIGMA, Monitoring report: The Principles of Public Administration, Montenegro, November 2017, p. 78.

12 Report on the state of protection of personal data and state in the field of access to information for 2017, p. 77

STRUCTURE OF ENTITIES WHO SEEK INFORMATION

Physical entities were the most common submitters of requests for free access to information to local self-governments, in the period from 1/1/2017 to 1/1/2018, with even as much as **505 (43%)** requests. Next are non-governmental organisations (NGOs) with **472 (40%)** submitted requests and other legal entities with **193 (17%)** submitted requests.¹³



Graphic 3. Graphic representation of entities that seek information from local self-governments

A change is noted in the trend considering that previous researches have shown that non-governmental organisations are the most frequent submitters of requests for free access to information¹⁴. This is positive because it can be an indicator of a greater interest of citizens for local issues and the community they live in. However, depending on the information requested by these requests, this may also mean that certain data that should have been on the municipal websites were not available, which would be an indicator of a reduced level of transparency in the work of local self-governments.

¹³ Bodies of Municipality of Herceg Novi have not submitted complete data on submitters of requests to the day of presentation of data, therefore these numbers may vary.

¹⁴ Centre for Civic Education (CCE), I have the right to know – report on transparency of local self-governments on example of Capital City Podgorica, Kotor and Pljevlja, 2017, available on <http://media.cgo-cce.org/2018/05/cce-i-have-the-right-to-know.pdf>

(NON)AVAILABILITY OF DATA ON WEB PRESENTATIONS OF LOCAL SELF-GOVERNMENTS

Desk research of websites of local self-governments included a check of uniformity of data available on websites with data that should be available to the public, according to the provisions of Article 12 of the Law on Free Access to Information. That refers to: 1) the access to information guide; 2) public registries and public records 3) programmes and work plans; 4) reports and other documents on work and state of play in areas within their competence; 5) drafts, proposals, and final texts of strategic documents, plans and programmes for their implementation; 6) draft and proposal of laws and other regulations, as well as opinions of experts delivered in relation to drafts and proposals for legislation; 7) single acts and contracts on use of financial resources originating from public revenues and of state-owned property; 8) list of civil servants and state employees with their titles; 9) list of public officials and pay lists for them, as well as list of other incomes related to exercise of public function; 10) Decisions and other single acts that are of importance to rights, duties, and interests of third parties; 11) Information to which the access was granted upon request.

Respecting this provision and setting up all the data is in the spirit of proactive access to information, which should ease the work of officials who address the requests for free access to information, relieve local self-governments' work, and also enable citizens with better access to information.

This part is outlined as prescribed in Article 12 with additional attention given to public discussions, budget, and data on public procurement, as these are the data that are rated as the most subjected to corruption.

a. Guides for free access to information

The majority of local self-governments in Montenegro (17) have guides for free access to information on their websites. Six local self-governments have no guides that are publicly available on the website, which is a direct violation of Art. 12 of the Law on Free Access to Information. Also, in local self-governments, the most common practice is creating guides at the level of bodies of local self-governments. Discrepancies arise when publishing these data on sites, so we have situations where guides are available for five bodies of a local self-government, and for three there are none. We evaluated this as a presence of guide although it is obvious that the work of that municipality and its units is not fully transparent.

The time of adopting guides varies as well. The least number of municipalities have a uniform time of adopting guides. Although according to the Law, municipalities are obliged to adopt one every year, whereby only a few municipalities in several bodies have a guide for 2018, while the other guides date from 2017 to 2006.

This is an area for intervention of the Agency for the Protection of Personal Data and Free Access to Information, which besides the responsibility for (non) publication of guides should also deal with their content. Specifically, they often do not contain any updated data on persons who address requests or the information listed are not in compliance with certain amendments to laws and bylaws.

b. Public registers and public records

Most of the data that include public registers and records also include data that can only be obtained at a party's request, most often in local self-government premises. Such data, such as excerpts from birth registers, books and other various registers of service-users, are not data that can be made public and available on the website in order to protect the privacy of the person to whom they relate.

Data such as the list of councillors, public companies and public institutions, issued building permits and documentation related to urban-construction land have been quite updated. In some municipalities there are also lists of local NGOs and lists of projects approved on the basis of allocation of funds from municipal budgets. However, these data are often in formats that are not usable for further use, or even require the use of advanced programmes that users with basic knowledge might not be able to use.

Also, municipalities often have *drop-box* accounts for more extensive data from which the requested data can be downloaded, which is the most common case for financial documentation and reports.

Finally, public registers and records are not consolidated in one place on the website, so their search is difficult. Data binding for a body which is in charge of keeping these registries may be useful from a technical point of view, but it would be more useful for citizens-users to classify documents according to the data group they belong to in order to make them more transparent and easier to find.

c. Programme and plan of work of local self-government

These are the data that should be clearly separated on the website of the local self-governments. In as many as 10 local self-governments, programmes and work plans are not available to the public, while this is relatively unregulated in other 13 local self-governments, or these data are either scattered across the site or can be found only by direct search in the search engine. This indicates that there is no political will to make such data public and easily accessible on the site, despite the fact that most sites have clearly separated categories for these documents.

d. Reports and work documents

Reports on the work of local self-governments are consolidated in some municipalities, and in some they are divided by local self-government bodies. This makes them inconsistent both in terms of content and in the manner and time of publication, so it often happens that they are available for certain authorities, and for some there are names but not a document that can be opened. In addition, the year from which reports are available also varies from body to body, so some reports are from 2013 and some from 2017.

Six local self-governments have available report from 2017 on their websites. Nine municipalities have old reports (from 2016 and earlier), seven municipalities have no available reports on sites, while one municipality has reports from 2017 for some bodies, while other reports come from previous years.

Uneven practice at the level of bodies creates further problems because such manner

of work of some bodies and delays cause complaints to the Agency and lawsuits before the Administrative Court, which burdens the system.

e. Drafts and proposals of laws and strategic documents

This information can mostly be found in the Public Discussion section, if such exists on the site. These data are mostly updated, but do not exist as a separate section on the site in any municipality.

Also, on most municipal sites, there are flaws in the part of the available legal texts that regulate their work.

f. Contracts and separate acts on financial means

Most of the local self-governments maintain this section, to greater or lesser extent. Six local self-governments have no data on concluded contracts, while others have information separated in the part referring to bodies or in a separate part that relates exclusively to the contracts of this self-government.

Other individual acts, such as analytic cards published by some local self-governments, are far more difficult to find. Specific information about the use of official vehicles is rare and most often there are only data about the regulations regarding the use of the same.

g. List of civil servants and state employees

Only six local self-government sites have lists of civil servants and employees employed in the bodies of these self-governments. In some local self-governments, there are lists in the drop-down menus that are part of the employees within bodies of local self-government. However, this cannot be accepted as a valid list which must be separately given in the form of a single document.

The fact that 2/3 of the local self-governments in Montenegro does not have this list is worrying, especially considering that the local level has expressed problems with transparency in the part of employment.

h. Decisions and other individual acts

Nine local self-governments have not made available decisions and other individual acts on their websites. However, those that published them, have them updated, although finding them depends on whether they are organized within a body or in a separate part of the site.

In any case, the decisions that are available are not organized and often do not have adequate names which makes them hard to use, so it should be specified what solution, decision or other particular act is it in order to make the later use easier for end-users.

i. Information approved through the Law on free access to information

When it comes to decisions and information that are approved under the Law on Free Access to Information on websites, even 14 local self-governments, or more than half, are missing these data. However, not even those which have sections for these decisions and information do not always update them and often individual decisions

from previous years or links that should lead to other decisions that ultimately prove as unusable can be found.

j. Public procurement

The data that can be most commonly found in these sections are calls, contracts, and tender documentation. However, in this part, we note the shortcomings in terms of updating and integrity of data, and the two local self-governments do not have a separate section for public procurement at the website at all (Danilovgrad and Gusinje). Also, the data are often spread chronologically rather than separately as per public procurement in order to make it easier to search and track the flow of procurement.

This is part of the obligations arising from the AP for Chapter 23, and the Report on implementation of the Action Plan for implementation of Chapter 23 January-June 2018 states that *All ULSG established a special public procurement service or appointed a public procurement officer. All ULSG on the PPA website and on their website announce the Public Procurement Plan, calls for public bidding, decision on selection of bidders, contracts and annexes to the public procurement contract and decisions on disposal of municipal property. In certain number of municipalities, public procurement analysis is performed from the aspect of the risk of corruption. All ULSG established a special public procurement service, i.e. appointed a public procurement officer.* However, local self-governments have established a special public procurement service, but all other obligations are not at this level of fulfilment, as stated in the Government Report.

k. Budget

Most self-governments have made available data relating to the current year and in some cases they even include additional data related to spending from the budget, plans, etc. but it cannot be said that all data has been updated. Only Gusinje has no budget available on the site.

l. Public discussions

Three municipalities - Danilovgrad, Gusinje and Rozaje - do not have information on public discussions on municipal websites. Otherwise, the content of these sections varies from municipality to municipality. While some minutes and calls for public debates were disorganized, others resolved this, again, by dividing it by the bodies. The content of this part must be in accordance with the positive law of Montenegro and the practice of bodies, given in a separate part of the site for each individual public procurement.

In general, when analysing the availability of data on the site, it is still visible that local self-governments are reluctant to be responsible and transparent in their work, even in spite of legal obligations. Proactive publishing is not close to them, nor they see it as facilitating work and involving the local community. It seems that via partial publishing of data, certain information that should be available to the public due to its influence on development of local self-government and life of citizens is trying to be covered up.

CONCLUSIONS AND RECOMMENDATIONS

The degree of transparency of local self-governments varies, thus some of them make a large part of data available, while some other self-governments are trotting in the proactive publication of data. When it comes to resolving requests for free access to information, practice varies, but one of the key challenges identified is still the administration silence, which burdens both the first and second instance bodies.

One of the frequent problems in finding information that is of public importance on the websites of local governments is the obsolescence of data published. Thus, the work of local governments would be easier if they published the data from the year in which they were adopted, within 15 days of adoption, so that the public would be timely informed of the work plan and changes if they occur. **The data on the sites must be updated in accordance with the obligations imposed on the local self-government bodies by the regulations of Montenegro.**

The inconsistency in publishing data as per bodies is the worrying practice of local self-governments that can point to in-activity or deliberate disguise of data. **The authorised bodies in the local self-government must assume the obligation to monitor the uniformity of the work of all bodies so that there are no significant deviations in their work and availability of data on the sites.**

When conducting this research, it was noticed that there are sites, such as the site of Bijelo Polje municipality, which is easy to search, and that on the other hand we have complicated sites that are extremely difficult to search. This directly reduces the ability of citizens to find the information they need. **The authorised Ministry of Public Administration should develop a model of unified websites for all local self-governments in order to facilitate access to information and improve the openness and transparency of the work of local self-governments¹⁵.**

According to the findings of this research, it is noticeable that all municipalities in Montenegro have violated some of the provisions of Article 12 of the Law on Free Access to Information. Therefore, **it is necessary to conduct annual checking of the list of all data and documents that must be available on local self-governments' sites, to make reports on the performed check and to publish individual reports on municipal sites¹⁶.**

15 Centre for Civic Education (CCE), I have the right to know – report on transparency of local self-governments on example of Capital City Podgorica, Kotor and Pljevlja, 2017, available on <http://media.cgo-cce.org/2018/05/cce-i-have-the-right-to-know.pdf>

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