ICEDA

Increasing Civic Engagement
in the Digital Agenda

DIGITAL AGENDA OBSERVATORY 2021

CUMULATIVE REPORT ON DIGITAL AGENDA ADVANCEMENT IN ALBANIA, KOSOVO, MONTENEGRO, NORTH MACEDONIA, AND SERBIA

JANUARY 2022

DIGITAL AGENDA OBSERVATORY 2021

CUMULATIVE REPORT ON DIGITAL AGENDA ADVANCEMENT IN ALBANIA, KOSOVO, MONTENEGRO, NORTH MACEDONIA, AND SERBIA

January 2022

ICEDA
Increasing Civic Engagement
in the Digital Agenda

The Increasing Civic Engagement in the Digital Agenda – ICEDA project aims at increasing the engagement of the civil society organizations (CSOs) in the shaping and implementation of the Digital Agenda in the Western Balkans (DAWB).

TABLE OF CONTENTS

LIST OF ACRONYMS

AEC - Agency for Electronic Communications

DA - Digital Agenda

DAO – Digital Agenda Observatory

CERT – Center for the Prevention of Security Risks in ICT systems

CIRT – Information Security and Computer Identities Directorate

CRTA - Center for Research, Transparency and Accountability

CSDA – Cross-cutting Strategy on Digital Agenda

CSO – Civil Society Organization

EU – European Union

ENER – Unique National Electronic Registry of Regulations

ERPAC – E-Register on Public Announcements and Consultations

ICT – Information and Communication Technology

ICEDA - Increasing Civic Engagement in the Digital Agenda

IT - Information Technology

KODE - Kosovo Digital Economy

MISA - Ministry of Information Society and Administration

NAECCS - National Authority for Electronic Certification and Cyber Security

NAIS – National Agency for Information Society

ODK – Open Data Kosovo

OGP – Open Government Partnership

RIA - Regulatory Impact Assessment

YOU - Youth Online and Upward

PREFACE

Digitalization in all spheres and for all social groups (without exception) is an effective mechanism for improving the well-being of citizens. This means improving the digital work and greater efficiency of institutions, organizations and other social entities. The need for digitalization became even more evident due to the COVID-19 pandemic, as it pointed to the urgent need for mechanisms, tools and adapted regulation for better organization and a fully functioning society. Thereby, the so-called "digital gap" occurred, i.e. the difference between the citizens in the initial positions regarding their access to the Internet, access to electronic devices, and hence the differences in the levels of their digital skills/literacy.

The Digital Agenda (DA) covers the development of the information society in the broadest sense. In order to actualize the issues of DA in the countries of the Western Balkans, the project Increasing Civic Engagement in the DA – ICEDA is currently being implemented with the financial support of the European Union (EU). The project is implemented by a partner consortium of CSOs, namely, Metamorphosis Foundation for Internet and Society (North Macedonia) as a leading partner, in cooperation with the e-Governance Academy (Estonia), CRTA – Center for Research, Transparency and Accountability (Serbia), NGO 35mm (Montenegro), Open Data Kosovo (Kosovo[1]) and by Levizja Mjaft! (Albania).

Although the topic of DA as an initiative covers a number of aspects, the activities and studies of the ICEDA project are mainly focused on the implementation of: e-government, raising public awareness, digital literacy and civic participation. Within this framework, in the period between March – May 2021, research consistent with the baseline study (conducted in the period between May – June 2020) was conducted in each of the targeted Western Balkan countries, namely Albania, Kosovo, Montenegro, North Macedonia, and Serbia. The aim of the research is to measure the progress in relation to the initial state of the areas correlated with the DA. The analysis resulted in a report that deals with topics related to the chapters of EU legislation, relevant to the DA, i.e. Chapter 10, entitled – "Information Society and Media".

Specifically, this document represents a cumulative report of DA advancement in each of the targeted Western Balkan countries which provides a comparative overview of the current situation in this field. More specific information for each country can be found in the individual Country reports, links to which are available in the Roadmap section of this document.

---

1   This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence.
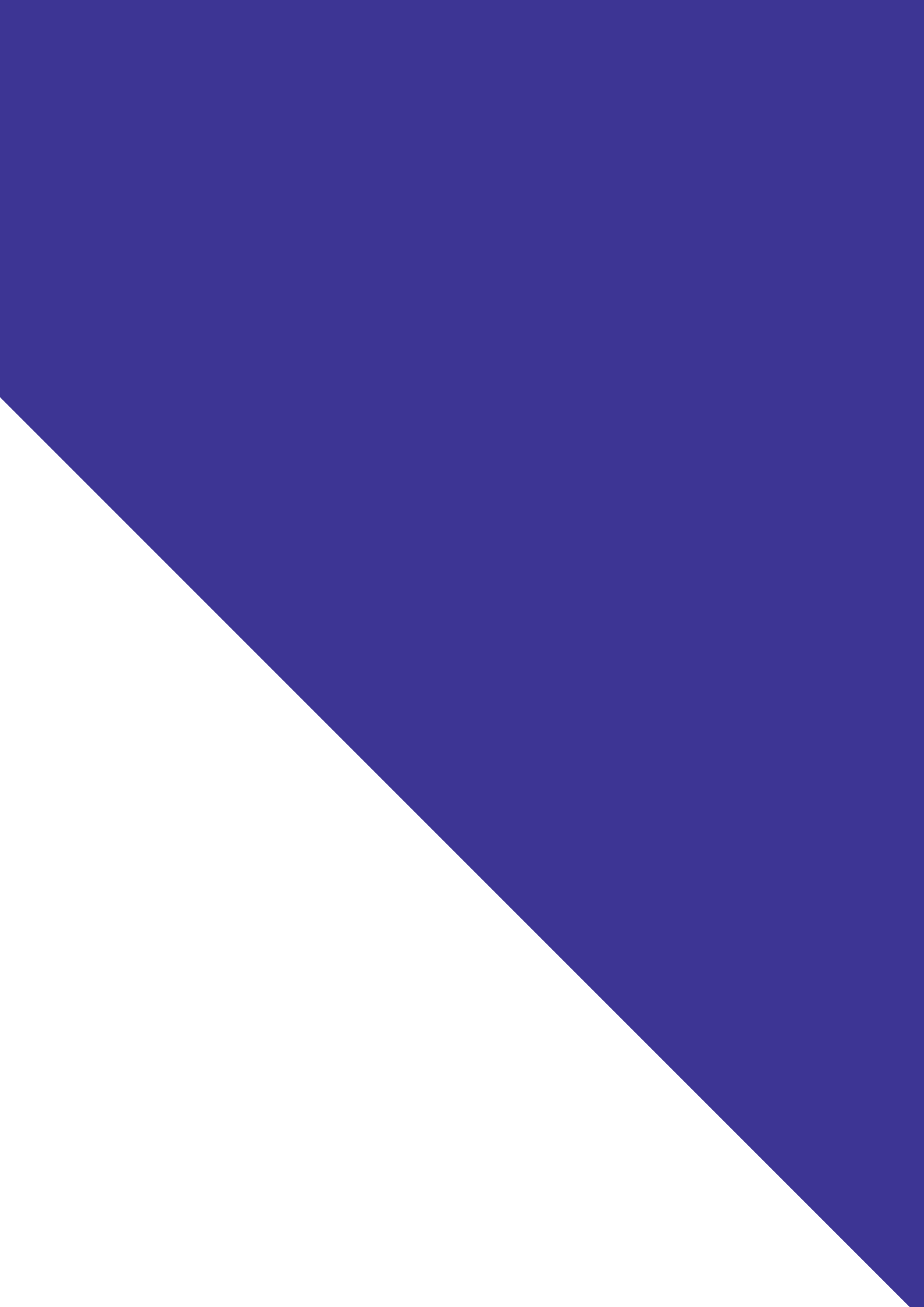
RESEARCH METHODOLOGY

The research methodology of the Digital Agenda Observatory (DAO) builds on the previous Country reports and roadmaps for DA advancement in the targeted Western Balkan countries and focuses on the topics on which CSOs have the greatest impact. The research is conducted on the basis of key indicators contained in a previously prepared questionnaire. The indicators are foreseen to enable a regional comparison between the selected countries from the Western Balkans, which should further contribute towards a positive competition and serve as a motive for further implementation of the DA.

The research is based on conducted desk research (review of conducted research; existing policy documents; national strategies; programs of the Government and central institutions of the targeted Western Balkan countries; publicly available reports and other relevant sources), then semi-structured interviews with persons directly involved and affected by the digitization process, as well as the testing of one national policy and three electronic services (e-services).

Based on the research conducted in this way, a report and a roadmap with recommendations have been prepared from each targeted Western Balkan country. The report provides an overview of the current state of development of the DA and provides insight into the role of CSOs in this area from all the targeted Western Balkan countries. The report and the roadmap can serve as a basis for additional in-depth research, but also as a motive and argument for creating strategic documents that will lead to enhanced digital transformation.

1

PRECONDITIONS FOR IMPLEMENTATION OF E-GOVERNMENT

1. PRECONDITIONS FOR IMPLEMENTATION OF E-GOVERNMENT

One of the preconditions for the successful implementation of e-government is for citizens to have the necessary means to use the e-government services. One of the main factors in this process is the access to the Internet. Overall, the targeted Western Balkan countries have a high internet penetration, namely a high percentage of households have access to the internet. The majority of the targeted Western Balkan countries have incurred an increase of internet penetration from 2019 to 2020 as shown in Table 1.

Table 1. Internet penetration in the targeted Western Balkan countries for 2019 and 2020

	Albania[1]	Kosovo[2]	Montenegro[3]	North Macedonia[4]	Serbia[5]
2019	73.5%	93.2%	74.3%	81.8%	80.1%
2020	75.2%	96.4%	80.3%	79.9%	81%

To continue with, the DAO report focuses also on the use of e-services, specifically the number of users. It is reported that none of the targeted Western Balkan countries collects fully comprehensive data regarding the usage of all of the e-services provided by institutions at all levels. This is due to the lack of full centralization of e-services within one platform, since some e-services are offered within the national e-services platforms, whereas some are offered through the websites of individual public institutions; and due to the lack of mechanisms to continuously collect such data for the purpose of evaluation and detecting potential obstacles in e-service usage.

Nevertheless, there is certain data available regarding the usage of the national e-services platforms, some of which follow patterns similar to other countries of the region. In **Albania**, a total of 7,705,068 applications for e-services have been submitted, and a total of 1,210,093 citizens and businesses served through the e-Albania portal[7]. As a major step forward, in February 2021, **Kosovo** launched the national e-services portal e-Kosova[8]. The portal has a total of 5,945 registered citizens and businesses, and 57,414 services have been used through it mainly related to paying taxes, police- and health-related issues. However, there is no comprehensive data regarding the usage of e-services delivered by other individual public institutions which are not offering their services through the centralized e-service platform.

In **Montenegro**, the level of e-services usage has been constant since 2017, showing a slight increase with a total of 491 applications submitted through the e-services national portal in the first 6 months

---

2   Internet penetration in Albania. Access here: https://bit.ly/2Xvc2cp
3   Internet Penetration in Kosovo. Access here: https://bit.ly/3tJTl0d
4   Internet Penetration in Montenegro. Access here: https://bit.ly/3CdihAl
5   Internet Penetration in North Macedonia. Access here: Пристапено: https://bit.ly/3tPLwXa
6   Internet Penetration in Serbia. Access here: https://bit.ly/2Z0hSDd
7   Albania national e-services portal. Access here: https://e-albania.al/
8   Kosovo national e-services portal. Access here: https://ekosova.rks-gov.net/

of 2020. Meanwhile, **North Macedonia** only has data regarding the usage of the national e-services portal[9] which was launched in December 2019. According to the research conducted in 2020, there were a total of 17,241 registered users on the portal, while during the current research this number had doubles (34,834 registered users). The total number of users of all available e-services (except on the Portal) cannot be determined, because so far such statistics are not kept by state institutions nor the State Statistical Office. Compared to data from April 2020, in **Serbia** the number of e-government portal registered users increased for 17.857 and is now 1.026.347[10], which makes 15% of the population of Serbia. However, the number of services provided did not change compared to previous data, and is in average 76.028 per month.

9   North Macedonia national e-services portal. Access here: www.uslugi.gov.mk
10   Serbian national e-services portal. Access here: https://euprava.gov.rs/

2
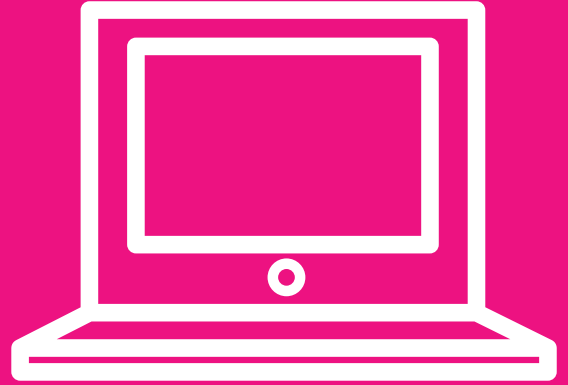
POLITICAL WILL AND STRATEGY

2. POLITICAL WILL AND STRATEGY

Political will and strategic commitment towards DA advancement and issues related to it are highly present in the targeted Western Balkan countries whether as specific DA strategies or topics related to it such as e-governance, cybersecurity, artificial intelligence, digital literacy, etc.

To begin with, through the Cross-cutting Strategy on Digital Agenda 2015–2020 (CSDA)[11] **Albania** aimed at increasing and promoting the usage of e-services, promoting ICT as part of education, and consolidating digital infrastructure, demonstrating its will to implement the DA. The greatest public attention of CSDA 2015 – 2020 was focused on the creation and functionality of the government portal, through which the general public and businesses could access public e-services. A continuation of this strategy is yet to be developed for the period between 2021–2026. Meanwhile, the digitization process in Albania is being administered through an Action Plan 2020 – 2022, in order to continue the objectives set in CSDA 2015 – 2020.

Kosovo has also demonstrated political will and strategic commitment to the digital transformation process through strategies which touch upon DA-related topics, initiation of membership in international organizations such as Open Government Partnership (OGP), and putting legislation in place which foster the implementation of the DA. Kosovo is currently working on developing the next DA strategy, as well as strategies regarding cybersecurity, public administration reform, e-governance, etc. Moreover, 'Efficient Governance' is a key part of the government's governance program[12] for the next 4 years, which is foreseen to be achieved through public administration reform, increase of e-governance usage, fostering a system of interoperability, and the advancement of the e-Kosova portal, amongst other things.

Despite changes in the government structure, in **Montenegro** the issue of quality e-government has remained a priority. Strategies in Montenegro that foster the DA the Public Administration Reform Strategy 2016–2020, Cyber Security Strategy 2018–2021, Information Society Development until 2020, and OGP National Action Plan 2018–2020. Strategies tackling Digital Transformation, Public Administration Reform, Cyber Security, and OGP are currently under development.

North Macedonia possesses a variety of documents which guide the respective institutions regarding the DA, many of which are outdated and need to be adapted to current trends and needs of the citizens. The digital transformation and alignment of the reform measures with the DA are a complementary part both of the Economic Reform Program for the period 2021 – 2023[13] adopted by the Ministry of Finance, and of the Ministry of Information Society and Administration's (MISA) Strategic Plan 2021–2023. The

---

11   Cross-cutting Strategy on Digital Agenda 2015-2020 (CSDA). Access strategy here: https://bit.ly/2XjZiow
12   Kosovo's new government program. Access program here: https://bit.ly/3nA6RTm
13   Economic Reform Program for the period 2021 - 2023. Access reform here: https://bit.ly/2XtuMJt

preparation of a National Strategy for Artificial Intelligence[14] is underway, and following the publication of the Country report, MISA put the Draft-National Strategy for ICT and Action Plan 2021–2025 up for public consultation. Hence, the political will is evident but its implementation in practice remains to be seen.

Similarly, **Serbia** shows political will and strategic commitment towards the advancement of e-governance. Serbia has adopted the eGovernment Development Programme and Action Plan 2020–2022, which paves the way for further development of eGovernment in Serbia, as one of the goals of the public administration reform and priorities of the Government[15]. Through this program, 300 new e-services are expected to be offered for citizens and the economy within the next two years.

14   Information about National Strategy for Artificial Intelligence: https://bit.ly/3hzPG0i
15   More information about eGovernment Development Programme in Serbia: https://bit.ly/2VKOoba

3
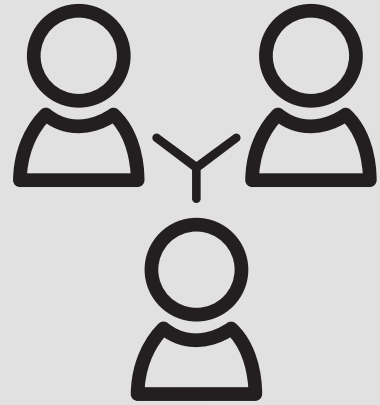
COORDINATION OF E-GOVERNMENT IMPLEMENTATION

3. COORDINATION OF E-GOVERNMENT IMPLEMENTATION

In line with the political will and specific DA related strategies described, each of the targeted Western Balkan countries has institutions assigned to overseeing and fostering e-governance. In **Albania**, the government has created institutions that within their scope of work have the obligation to directly exercise the digitalization or integral and complementary segments of this process, such as: National Authority on Electronic Certification and Cyber Security (NAECCS), National Agency for Information Society (NAIS), Ministry of Energy and Infrastructure, Ministry of Finances and Economy, Ministry of Education, Sport and Youth, The Information Center for Public Services, and Commissioner for Right of Information and Personal Data Protection.

In **Kosovo**, the Department for the Development of e-Governance within the Agency of Information Society is responsible for e-governance implementation, consisted of two sectors: Sector for Policies, Monitoring and Analysis; and Sector for Online Support and Promotion of e- Governance. Likewise, in **Montenegro**, the institution responsible for the implementation of the DA is the Ministry of Public Administration, Digital Society and Media (MPADSM), as stated in its name. Aside from creating public policies governing the system of public administration in Montenegro, the Ministry also deals with digital transformation, aiming at providing better quality of services and new digital services. Other ministries involved in this process are: Ministry of Finance and Social Welfare, Ministry of Interior, Ministry of Health, and Ministry of Education, Science, Culture and Sports.

Similarly, in **North Macedonia**, MISA is the central body in the processes of this coordination, with its own realized projects, strategic plan and annual work program. Their activities are related to the development and promotion of the information society, as well as to the integrated information and communication network, databases, interconnection and exchange of information, security aspects and infrastructure development[16]. Whereas for **Serbia**, the main body to oversee and implement the e-governance is the Government Office For Information Technologies And e-Government. The Office carries out tasks related to designing, harmonizing, developing and functioning of e-Government and information systems, as well as infrastructure of state administration bodies and Government services.[17] Two Ministries are in charge of preparing legal framework: The Ministry of State Administration and Local Self-Government concerning public administration reform and the e-government and coordinates the e-government development at the regional and local level and the Ministry of Trade, Tourism and Telecommunications, Department for the Digital Agenda.

---

[16]   North Macedonia Action Plan regarding e-Governance coordination. Access Action Plan here: https://bit.ly/3nDPm4r

[17]   Office for IT and Government in Serbia. Visit their website here: https://bit.ly/3zuzvHX

4
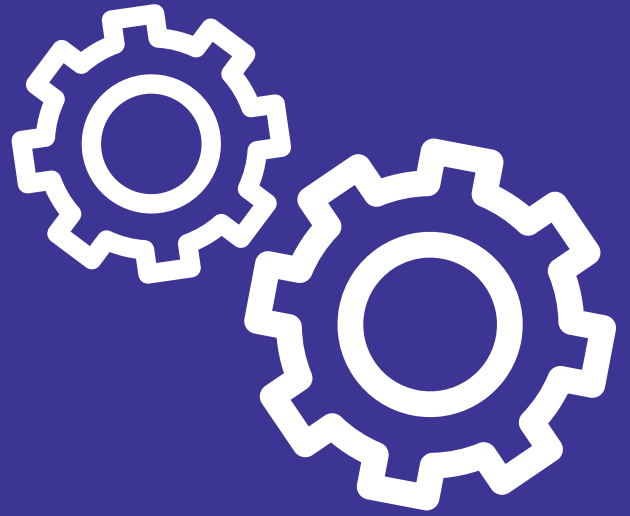
LEGAL FRAMEWORK

4. LEGAL FRAMEWORK

All of the targeted Western Balkan countries have specific legislation in place which fosters the implementation of DA-related issues, some of which are shown in Table 2.

Table 2. Legislation in the targeted Western Balkan countries regulating DA-related issues

COUNTRY	LEGISLATION
Albania	Law on Electronic Signature Law on Data Protection Law on Electronic Communication Law on Electronic Trade Law on Electronic Document Law on the Database of State
Kosovo	Law on Protection of Personal Data Law on Access to Public Documents Law on Information Society Governmental Bodies Law on Electronic Communication Regulation on Electronic Databases Law on Local Self-government18 Regulation for Minimal Standards of Public Consultation Draft-Law on Digital Identification and Trust Services in Electronic Transactions Draft- Law on Cyber Security
Montenegro	Law on Electronic Administration Law on Electronic Identification and Electronic Signature Law on Information Society Law on Electronic Document
North Macedonia	Law on Electronic Management and Electronic Services; Law on Electronic Documents, Electronic Identification and Trust Services; Law on Central Population Register; Law on Personal Data Protection (and the Directorate for Personal Data Protection, as a responsible body); Law on Free Access to Public Information.
Serbia	Law on Electronic Communication Law on Electronic Document, Electronic Identification and Security Services in Electronic Commerce Law on Electronic Administration Law on Free Access to Information of Public Importance Law on Protection of Personal Data

5

STATE OF
E-SERVICES

5. STATE OF E-SERVICES

While there have been major developments in the e-governance sphere such as electronic signatures, national e-services portals, interoperability platforms, research shows that much more needs to be done to promote e-services amongst the targeted Western Balkan countries.

The use and diversity of the national e-services portal in Albania is important to be noted. e-**Albania** has completed 95% of public electronic services, reaching the number of 1,217 services, 300 of which are for business. Currently, the e-Albania portal is the only platform in the region where citizens can receive their personal public services electronically.

Kosovo has witnessed major developments since DAO 2020, namely: 1) the development of the national e-services portal e-Kosova which is continuously adding new e-services in collaboration with other institutions; 2) the establishment of the interoperability platform which enables secure data exchange between a variety of institutions such as: The Kosovo Business Registration Agency, Civil Registration Agency, Tax Administration of Kosovo, Customs, Kosovo Cadastral Agency, etc; 3) the Draft-Law on Electronic Identification and Trusted Services in Electronic Transactions. These recent developments are promising and are only the first steps towards a widespread usage of e-services. Similar to Kosovo, in **Montenegro** some e-services are offered through the national e-services portal, and some through individual institutions' websites. Montenegro also uses a document management system within which more than 680,000 cases and over a million documents have been registered so far. Recently, a significant progress has been made concerning the use of digital signatures and electronic identification. In the past, digital certificates were predominantly used by companies in their communication with the Tax Administration (20.000 companies in 2018), but not so much by individuals (400 individuals in 2018). With the introduction of new ID cards with a chip in 2020 and the planned amendments to the Law on Electronic Document, according the interlocutors about 70,000 people (more than 10% of the population) have a new electronic ID card. Similar to Montenegro, in **North Macedonia**, the MISA has developed a new Document Management System, where according to research[18], only 9 out of 101 institutions that responded to the research noted that they have DMS. Nevertheless, North Macedonia has a National Interoperability Framework[19] which covers legal, organizational, semantic, and technical interoperability, Additionally, the Law on Electronic Management and Electronic Services and the Law on Electronic Documents, Electronic Identification and Trust Services by the competent authority (MISA) is considered to be at an advanced stage.

Whereas, in **Serbia** the government e-services portal was established in 2010, and by now it has 1.026.347 of registered users. In 2020 the Portal underwent a major reconstruction

---

18   Building a public sector based on knowledge. CCM. Available at: https://bit.ly/2VGnbWY
19   North Macedonia National Operability Framework. Access Framework here: https://bit.ly/3tIEx26

which improved the safety of user profiles through a two-step verification process, and was equipped with new design and improved functionality. More importantly, the Portal interconnected 15 different state registries and made them available to its users.

In addition to the research, e-services in relation to taxes, fiscalization processes, education, health etc. were tested, and overall, the e-services were relatively easy to use through easy access procedures, and clear instructions. Some of the e-services tested were directly accessed through the national e-services portal, or from other public institutions' websites. However, some of the tested services were not fully electronic, were not fully safe and needed further improvement to improve the experience of the users.

6

DIGITAL LITERACY

6. DIGITAL LITERACY

A similar scenario plays out in all the targeted Western Balkan countries. Specifically, there are no concrete and on-going strategies, except for Serbia, to foster the development of digital skills, and there is no specific data which points out what exactly needs to be done in this regards.

In **Kosovo**, within the Ministry of Internal Affairs and Public Administration, the Kosovo Institute for Public Administration (IPAK) is responsible for capacity-building of public officials and increasing the sustainability of civil service. IPAK provides training for public officials which are responsible for IT management in each institution, yet, such trainings do not have high attendance since they are not mandatory and public officials are not incentivized to participate. Whereas regarding ICT training provided to the general public, besides the numerous projects implemented by ODK and other CSOs in Kosovo, the ongoing project "KODE[20]" which is implemented by the Ministry of Economy with the following main components aims to tackle the ICT capacities of the public: Financing Digital Connectivity, National Spectrum Monitoring, Training for unemployed and under-employed young people through Youth Online and Upward (YOU) Program, and National Research and Education Network.

For **Albania**, the Country report does not provide information on digital literacy, whereas in **Montenegro**, there is no data on specific forms of building and improving digital skills of both civil servants and citizens. One of the goals of the MPADSM is to work on improving common information systems: from the electronic identity system, electronic payment of administrative and other fees system, electronic data exchange system, and the development and application of e-administration, as well as the development and application of a modem e-government portal and training for the use of common information systems.

In **North Macedonia**, research shows that digital skills are lacking not only in the general population but also in the public administration. With this level of digital skills, the transition to fully digital operations as well as fully digital services will not be quick nor easy, so the state must urgently take a strategic approach to mitigate this issue. The latest EC Progress Report[21] on the country states that the drafting of the Strategy for Development of Digital Skills has started, and digital literacy is a priority in the new Education Strategy, which will probably be coordinated by the Ministry of Education and Science (although MISA might also be a coordinator). In that regard, the adoption of a National ICT Strategy 2021–2025 is envisaged, but it has still not been adopted.

---

20   Kosovo Digital Economy Project. https://kodeproject.org/en/home-2/
21   Country Report North Macedonia, October 2020. European Commission. Available at: https://bit.ly/3hxsujc

Serbia is the only country of the region that has a strategic approach in dealing with digital literacy. The Strategy for Development of Digital Skills for the period 2020 – 2024 is set to develop digital skills of the citizens with the goal to achieve full potential of information and communication technologies to increase the standard and the quality of life,[22] specifically tackling digital skills among vulnerable groups. The latest information on digital literacy for 2020 shows that 51% of the population of Serbia is digitally illiterate, 15% is only partially literate, which makes the remaining 34% of the population completely literate. When it comes to differences in between genders, the female population has a higher percentage of digitally illiteracy by 4% compared to the male population.[23]

---

22   Strategy for Development of Digital Skills for the period 2020 - 2024 in Serbia. Available at: https://bit.ly/2Xs-BAqs

23   Serbia's Statistical Yearbook available at https://bit.ly/3zgM6y5

7

ACCESS TO E-SERVICES AND RAISING AWARENESS

7. ACCESS TO E-SERVICES AND RAISING AWARENESS

Thorough the national portals, citizens in each of the targeted Western Balkan countries can use e-services at different levels of sophistication. The portals are still being improved as more services are being added, but large-scale promotion and advocacy for their usage is still not a case in most of the countries.

In **Albania**, easy access to services is demonstrated by the big usage of e-Albania. Namely, during 2020 there were a total of 7,705,068 applications for e-services submitted by 1,210,093 citizens and businesses. A total of 12,000 administration employees have been trained to provide digitized, electronically signed public services, as well as 2,000 employee-based counter service staff to help citizens apply online for the services they need from the administration. 180 public institutions have generated a total of 13 million official electronic documents to help citizens. To increase the number of portal users and facilitate the understanding of digital procedures for obtaining online public services, by the end of 2022, NAIS aims at realizing 132 promotional and instructional videos mainly for e-services, 141 infographics related to e-Albania and instructions on how to use certain e-services, and 30 explanatory materials in the media.

Kosovo launched the national e-service portal in February 2021, with a low number of services, which may be attributed to the: 1) identification of e-services currently offered at central and local levels which takes time and extensive research; 2) informing public institutions and facilitating the transition of their e-services from their websites to e-Kosova; and 3). lack of legislation on digital signatures/stamps which hinders offering certain documents fully online. As this portal is relatively new, there has not been a large-scale campaign to promote it, which can also be said for other e-services offered by other public institutions.

In **Montenegro**, a positive development regarding the promotion and improvement of access to e-services is the update of the government website[24] launched in mid-May 2021. The website redesign mostly focused on greater citizen orientation, better presentation of services, information and news about Government sessions, news from ministries, etc. Additionally, most e-services can be found on the e-government portal (ww.euprava. me), currently accommodating 596 services provided by 52 institutions of which 187 can be fully completed electronically. The portal has a 'Frequently Asked Questions' section which only includes five questions, but there is customer support via the contact person's email address and brief instructions for using the portal. Unfortunately, filing complaints through the portal is not possible. Compared to the new government website, the design of the portal is outdated and not very user-friendly.

In **North Macedonia**, the national e-services portal is promoted as the main tool for citizens to access e-services with a total of 151 e-services. As such, the concept "One-stop shop for services and intermediaries for e-services" was established as a transitional or ancillary solution that would enable quick and easy access for all citizens to e-services. In line with this, there is a strong civil sector that monitors the implementation of DA, among which the Metamorphosis Foundation for Internet and Society and Center for Change Management stand out as two of the specialized CSOs with numerous researches. With their research and publications, they significantly influence the collection of data and the publication of research findings that enable the country to be measurable and comparable with other countries. However, very little effort has been made by the institutions to promote the portal and the e-services offered through it.

In 2020 the e-government portal in **Serbia** underwent major reconstruction due to which online security of profile users was improved and the portal was aligned with parameters for the use of services through mobile platforms. Having around 15% of the population being registered as users, the number of users in the last year has increased by 2%. The portal features services from local and national level provided by 124 institutions, one of the most used services being the enrolling the children in the kindergartens that was used by 47.964 parents.

8

CYBER SECURITY

8. CYBER SECURITY

Overall, each targeted Western Balkan country has legislation in place that guides the cybersecurity practices within public institutions and the public, also appointing government bodies/agencies responsible for cyber security-related issues.

Pursuant to the Law on cyber security, in **Albania** the NAECCS is the authority responsible for cybersecurity whose duties include contributing towards the drafting, implementation and monitoring of law enforcement in the field of cyber security. As reported by the Commissioner for Right of Information and Personal Data Protection[25], during this year 308 complaints filed by citizens on the misuse of their personal data for marketing purposes were handled, also through online platforms during the COVID-19 pandemic period. The report also shows that there are problems related to the implementation of all steps of data processing by public institutions, lack of legal and technical knowledge, shortcomings in addressing legal guarantees on the basis of contractual relations, lack of training for staff dealing with data processing, lack of a data processing strategy. As far as cybercrime reporting is concerned, the State Police together with the institutions that are subordinated to it are responsible for mitigating them, whereas cyber incidents are dealt with by cyber security institutions, in this case, infrastructure operators.

In **Kosovo**, the responsible government body for cyber security is the Agency of Information and Society, within its Directorate of Operation and Security. As no legislation directly tackles cyber security, a Law on cyber security is currently being drafted. The Law foresees the establishment of a State Cyber Security Agency responsible for overseeing, controlling, and setting cyber security standards, as well as the establishment of two state teams (one for responding to computer emergencies and the other for responding to cyber security incidents).

The Information Security and Computer Identities Directorate (CIRT) in **Montenegro** is one of the key mechanisms in the field of information and cyber security. One of the most significant achievements in this field is the drafting of the Law on Information Security, which transposed the EU Network and Information Security Directive. Moreover, the Decree on Information Security Measures was created, as well as the Law on Designation and Protection of Critical Infrastructure. Strategic planning of cyber security in Montenegro was based on the 2018–2021 Cyber Security Strategy, which defined mechanisms and instruments for pursuing national security interests, as well as on the work of the Information Security Council, formed in 2019. When it comes to changes in this area compared to the baseline report, the key one relates to the fact that the activity of CIRT teams, according to amendments to the Law on Data Confidentiality adopted at the end of 2020, was transferred under the competence of the Classified Data Protection Directorate which operates within the Ministry of Defense. In addition, it is important to

---

25   Commissioner for Right of Information and Personal Data Protection Report: https://bit.ly/3nxmFWX

point out that the development of the draft Cybersecurity Strategy of Montenegro 2022-2026 is currently underway.

North Macedonia has a National Cyber Security Strategy of the Republic of Macedonia 2018 – 2022[26]. When it comes to the security and integrity of networks, the rules are set by the Agency for Electronic Communications (AEC) with the Rulebook for ensuring security and integrity of public electronic communications networks and services and activities that operators should take in case of violation of personal security, dated from 2015, amended in 2019. Furthermore, the Law on Electronic Communications established the National Center for responding to computer incidents MKD-CIRT as a separate department in AEC which institutionalizes the protection of network and information security, especially of entities with critical infrastructure.

Meanwhile **Serbia** just recently renewed its Strategy for Development of Information Society and Information Security in the Republic of Serbia for 2021 – 2026[27], in line with the EU Directives. Additionally, the Law on Information Security regulates this domain. Pursuant to the Law on Information Security, the Regulatory Agency for Electronic Communications and Postal Services has been appointed as the National Center for the Prevention of Security Risks in ICT systems (CERT) of the Republic of Serbia[28], that is supervised by the competent authority – the Ministry of Trade, Tourism and Telecommunications. The national CERT collects and exchanges all information related to information security risks and notifies, alerts and advises ICT management teams in the Republic of Serbia, as well as the general public.[29] So far, there are 14 registered CERT associates, majority of whom are large business companies.[30]

26 North Macedonia National Cyber Security Strategy of the Republic of Macedonia 2018 - 2022. Access Strategy here: https://bit.ly/2VIMbNr
27 Strategy for Development of Information Society and Information Security in the Republic of Serbia for 2021 - 2026. Available at: https://bit.ly/3hIboz7
28 Center for the Prevention of Security Risks in ICT systems of the Republic of Serbia. https://www.cert.rs/en
29 Serbia National CERT. https://bit.ly/39gWpI4
30 Registered CERT Associates in Serbia. https://bit.ly/3hGZi9J

9

E-PARTICIPATION AND E-DEMOCRACY

9. E-PARTICIPATION AND E-DEMOCRACY

The e-participation and e-democracy are fostered across the targeted Western Balkan countries through legal acts, strategies, public consultation platforms, working groups etc.

Citizens' participation in the decision-making process in **Albania** is regulated through Law no. 146/2014 "On public notification and consultation". This Law also provides for the maintenance of a public consultation platform, which is the liaison platform where drafts are published in accordance with the law on consultation, for all ministries and executive agencies of the Albanian government. In addition to the platform, roundtables within institutions and communication via official emails are also channels of transmission of recommendations for improving the legal framework. During 2020, the executive has planned 117 draft projects for consultation, but only 36.7% of them have undergone this process. The most efficient way of conducting consultations, according to the reports of the ministries, has been through roundtables; the E-Register on Public Announcements and Consultations (ERPAC) has not been successful in receiving comments. Almost all ministries have consulted with representatives of public institutions and international and local organizations, without the presence of citizens.

E-participation activities in **Kosovo** are fostered at the local and central levels by different legal acts such as: Law on Local Self-Government which obligates municipalities to hold at least two public discussions with citizens in one calendar year; and the Regulation for Minimal Standards of Public Consultation which has resulted in the development of the e-Consultation Platform[31] within the Prime Minister's Office, amongst others. Besides such a platform, CSOs and civil society actors can be engaged in these processes through working groups.

One of the services offered by the MPADSM is e-democracy, emphasizing the importance of citizen participation in socio-political processes as an important segment of participatory democracy. The e-participation system represents a platform for electronic public debates that enable greater participation of citizens in the adoption of laws and strategies. The system was created in 2019 with the aim of enabling greater participation of citizens, and encouraging them to decide on matters concerning them and their community, and to participate in public debates on all strategic documents and laws passed by the Government of **Montenegro**. Registered users can participate in all active public debates and consultations, whose public invitations were published on the eParticipation[32] segment, and accordingly view all published reports, decisions and other relevant documents on the public debates and consultations that were conducted. Users take part in open public debates by entering comments, opinions and proposals into documents which were submitted to public debate or consultation.

---

31   Kosovo Public Consultations platform available at: https://konsultimet.rks-gov.net/
32   Montenegro e-Participation Platform available at: https://bit.ly/3EnsH2u

North Macedonia also prioritizes civic engagement and transparency, demonstrated through legal acts for coordination of the participation of citizens in decision-making and access to public information, namely the Law on Free Access to Public Information, but also the Open Data Strategy, 2018 – 2020. Citizen participation is also ensured through the Regulatory Impact Assessment (RIA), where RIA is mainly regulated by government decisions, and Rules of Procedure of the Government, but not by legal solutions. At the Unique National Electronic Registry of Regulations (ENER), citizens can comment on the proposed legal solutions and initiatives, and there is a Guide for giving feedback to the public on the results of the law drafting process. In the last three years, ENER has been the most used tool for e-participation. There used to be an e-democracy portal which is no longer in operation, and the e-citizens platform has not been set up either, i.e. the procurement of software for it has not been realized.

Serbia has the e-Public Debates Portal[33] that should display all public debates to draft laws that are active and those that are finalized. However, even though it was established in 2014 it still hasn't reached its full potential. Not all the institutions are using it, mostly using their own websites for publishing calls for participation in public debates, which represents a legal obligation in compliance with the Government Rules of Procedure. When it comes to e-petitions, there is no such mechanism provided by the state, even though pursuant to the Parliamentary Rules of Procedure, the Parliament of Serbia is obliged to consider initiatives, petitions and proposals submitted via e-mail or in provided online form on the website of the National Assembly.

---

33   Serbia e-Public Debates Portal. Available at: https://javnerasprave.euprava.gov.rs/

10

ROADMAP FOR DIGITAL AGENDA ADVANCEMENT IN TARGETED WESTERN BALKAN COUNTRIES

10. ROADMAP FOR DIGITAL AGENDA ADVANCEMENT IN TARGETED WESTERN BALKAN COUNTRIES

Aside from certain major developments since the DAO research in 2020 in some of the countries, there is a strong need for further action for DA advancement in each of countries. Specific recommendations for the targeted Western Balkan countries can be found in continuation.

Strategic, legal and administrative developments
- The targeted Western Balkan countries need to work on forthcoming strategies relating to DA and DA-related topics such as cybersecurity, digital literacy, e-participation, data protection, since the current strategies will soon expire or need to be updated according to trends and needs of the citizens.
- All public e-services need to be centralized within the national e-service portals, and data on their usage should be publicly displayed. All countries must focus on increasing the number of services that can be fully completed electronically. In Albania, public institutions should respect the legal deadlines for the provision of the services, whereas in Montenegro, the eUprava portal needs to be redesigned in order for it to be more user-friendly.
- The targeted Western Balkan countries should also look at the data that they are gathering from the citizens, either in terms of understanding user behavior as well as establishing concrete guidelines on how to their personal data.

Digital Literacy
- The need for better digitally-literate citizens and public servants is highlighted throughout each of the targeted Western Balkan countries. Strategic and joint approach from all stakeholders, with institutions as leaders of the process, is needed for spreading digital literacy among all groups or citizens, and public servants.

Cybersecurity
- The targeted Western Balkan countries must focus their efforts towards a safer cyberspace, including more awareness-raising among citizens and institutions to protect themselves from cyber attacks. In Kosovo, a Law on cybersecurity must be adopted accompanied by an Action plan for its implementation.
- The interoperability system should be strengthened, especially in Kosovo and North Macedonia, ensuring secure data exchange between all the institutions at all levels.

For more country-specific data please consult the DAO Country reports and Roadmaps for DA advancement.

Albania
- 2020: https://cutt.ly/2gL30Wc
- 2021: https://cutt.ly/BIqgn8K

Kosovo
- 2020: https://cutt.ly/igDrDw0
- 2021: https://cutt.ly/QYLlt9a

Montenegro
- 2020: https://cutt.ly/xWX79WK
- 2021: https://cutt.ly/fWX74o1

North Macedonia
- 2020: https://cutt.ly/gWXJduv
- 2021: https://cutt.ly/3WXH21y

Serbia
- 2020: https://cutt.ly/agPgYa0
- 2021: https://cutt.ly/0YHBJdi

Western Balkans
- Baseline research of the state of e-government development & digital literacy in the targeted Western Balkan countries (2020): https://cutt.ly/pWXJRz1

Project partners:

Metamorphosis Foundation for Internet and Society is an independent, nonpartisan and nonprofit foundation based in Skopje, North Macedonia. It is guided by openness, equality and freedom, with the mission is to contribute towards the development of democracy and towards increasing the quality of life through innovative use and sharing of knowledge. The program areas that Metamorphosis operates in are Media for Democracy, Education for Innovation, Social Accountability and Human Rights Online.
www.metamorphosis.org.mk

e-Governance Academy (eGA) is a non-profit think tank and consultancy organization: a joint initiative of the Government of Estonia, Open Society Institute (OSI) and the United Nations Development Programme. EGA creates and transfers knowledge and best practice in the area of digital transformation: e-governance, e-democracy and cyber security.
www.ega.ee

Levizja MJAFT! is a non governmental organization in Albania that aims to raise awareness of the many political and social problems facing Albania. Mjaft's role ranges from catalyst, mobilizer and innovator to several public advocacy campaigns. Mjaft! has vigorously embodied the function of public advocate for the causes of various groups such as students, pensioners, the Roma community, military retirees, people with sight disabilities, the vocationally disabled, people with sensory and motor impairments, fishermen, taxi drivers and high difficulty laborers.
www.mjaft.org

Open Data Kosovo is a nonprofit organization that believes in using civic-tech and digital humanitarianism to open government. Its goal is to bring government transparency and accountability through technology, opening government data, and engaging in digital humanitarianism. ODK is dedicated to promoting the idea that governance data should be made freely available for everyone to use and republished as they wish, without restrictions from copyright, patents or other mechanisms of control.
www.opendatakosovo.org

NGO 35mm works on the creation of a better society in Montenegro and the wider region. "Better society" implies respect for human rights and the rule of law, especially public responsibility and transparency of governments and their institutions, and also civic freedom of speech. Our vision of Montenegro and the region presumes access to these reconciled, multicultural, and mature democratic societies to the community of European countries.
www.nvo35mm.me

CRTA (Center for Research, Transparency and Accountability) is an independent, non-partisan civil society organization committed to developing democratic culture and civic activism. It is dedicated to creating public policy proposals, advocating for the principles of responsible behavior by the government and public institutions, and educating citizens on their political rights, to establishing the rule of law and developing democratic dialogue in the Republic of Serbia.
www.crta.rs