



Republic of North Macedonia

Government of the Republic of North Macedonia

TRANSPARENCY STRATEGY OF THE GOVERNMENT OF THE REPUBLIC OF NORTH MACEDONIA (2019-2021)



TRANSPARENCY STRATEGY

OF THE GOVERNMENT OF
THE REPUBLIC OF
NORTH MACEDONIA
(2019-2021)



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Section 1:

General observations about the
Transparency Strategy of the
Government of the Republic of
North Macedonia (2019–2021)

1. INTRODUCTION

1.1. Reasons for the strategy adoption

Basic commitments of the Government of the Republic of North Macedonia (hereinafter: GRNM) include effective exercise of citizens' rights and freedoms by means of increasing the institution's accountability and responsibility. Hence, the GRNM recognises that basic preconditions in that regard imply greater government transparency, but also of the bodies and organisations held accountable to the government. Namely, greater transparency has positive effect on democratisation in the state and allows its citizens to exercise control over the institutions. In addition, transparency has a positive impact on economic development in the state and its aspirations for Euro-Atlantic integration. This commitment is complementary to public administration reform and service orientation of public bodies.

In the last few years, the GRNM has taken numerous efforts to increase its transparency, but also the transparency of the bodies held accountable to the government. These efforts have been noted, inter alia, by the European Union. In particular, the 2019 Progress Report for the Republic of North Macedonia (hereinafter: 2019 Report)¹ underlined that "good progress has been made, especially with implementation of the public administration reform strategic framework, improved public consultations and increased transparency in policy-making".² Furthermore, the European Union noted that "the government took measures to improve public finance management and transparency",³ referring to the fact that "the government continued to consolidate democracy and the rule of law [...] and to improve its decision-making process and transparency of its work",⁴ which means "progress has been made in improving budget transparency through publication of the citizens' budget and increased budgetary data."⁵ Hence, there are no doubts about the positive undertone used by the European Union and there are visible differences compared to previous years (2016 Progress Report for the Republic of Macedonia), when it was stressed that "the country should in particular [...] ensure full implementation of the principles of accountability, transparency

1 Available at: <https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/20190529-north-macedonia-report.pdf> [retrieved on 6.9.2019].

2 See: 2019 Report, pg. 4

3 See: 2019 Report, pg. 5

4 See: 2019 Report, pg. 9

5 See: 2019 Report, pg. 12



and merit”, i.e. “budget transparency is not ensured, because clear, comprehensive, timely and reliable budgetary and statistical information is not publicly available”.⁶

Despite notable progress, the GRNM continues to recognise the need for consolidated, coordinated and focused efforts to improve its transparency and transparency of bodies accountable to the government.

Hence, at its 126th regular session the GRNM reconsidered and adopted the information on the need to develop the **Transparency Strategy of the GRNM**. This strategy originates from the vision for developed trust of the citizens of the Republic of North Macedonia in the Government, i.e. ministries and other state administration bodies and executive government institutions, and creating an ambiance of transparency and trust, in the wake of the EU and NATO integration processes.

1.2. Basic characteristics of the strategy

This transparency strategy is a two-year document that covers the period December 2019 – December 2021 and does not address only passive transparency (which at the moment is a law-stipulated obligation), but active transparency as well (referred in scholar literature as “voluntary transparency”). Namely, this strategy is aimed to encourage the GRNM, ministries, bodies within ministries, independent state administration bodies, independent state bodies accountable to the government, administrative organisations, state-owned public enterprises and joint stock companies founded by the GRNM: (1) to offer citizens as much information as possible beyond the instrument for free access to public information; (2) to harmonise their practices in terms of sharing information (unification of websites according to types of data and documents published, unified format for sharing data); (3) to facilitate the right to free access to information according to the law that governs this subject matter; (4) to offer access to their documents and provide active assistance to citizens in finding specific data.

On terms of this strategy’s relation to other developmental documents, it should be noted that this document is closely tied to the Open Data Strategy (2018-2020). These two documents complement each other, i.e. both strategies should (directly or indirectly) contribute to greater transparency of executive government’s central bodies. While the essence of the Open Data Strategy (2018-2020) is to anticipate methods in which data will be shared (computer-readable and unprocessed), the Transparency Strategy (2019-2021) goes one step further and addresses the issue of which specific datasets will be published, i.e. how citizens will be assisted when attempting to obtain access to data. Moreover, this strategic document is complementary to the Public Administration Reform Strategy (2018-2022),⁷ and another important document is the Open Government Partnership’s National

⁶ Available at: https://ec.europa.eu/neighbourhood-enlargement/sites/near/files/pdf/key_documents/2016/20161109_report_the_former_yugoslav_republic_of_macedonia.pdf [retrieved on 6.9.2019], pp. 10 and 11.

⁷ Available at: http://arhiva.mioa.gov.mk/files/pdf/dokumenti/SRJA_2018-2022_20022018_mk.pdf [retrieved on 9.9.2019].

Action Plan 2018-2020 that summarises commitments for free access to information and greater transparency, both at central and local level.⁸

Based on the GRNM's conclusion adopted at its 126th regular session, the Transparency Strategy of the GRNM (2019-2021) was developed by the working group chaired by Robert Popovski, Minister without Portfolio in Charge of Communications, Accountability and Transparency. This working group included representatives from the General Secretariat of the GRNM, Commission for Protection of the Right to Free Access to Public Information (which will be transformed into Agency for Protection of the Right to Free Access to Public Information [hereinafter: Agency or AFAI] in compliance with the Law on Free Access to Public Information published in the "Official Gazette of RNM" no. 101/2019), State Commission for Prevention of Corruption, Cabinet of the President of RNM, Ministry of Information Society and Administration, Ministry of Finance, Ministry of Local Self-Government, and several civil society organisations and foundations, as follows: Metamorphosis Foundation, Foundation Open Society - Macedonia, Center for Civil Communications, Association of Journalists of Macedonia, Independent Union of Journalists and Media Workers, Centre for Change Management, Platform of Civil Society Organisations for Fight against Corruption, International Republican Institute (IRI) and National Democratic Institute (NDI). Inevitably, members of the academic community also had crucial role in the strategy development. Participation of the above-enlisted entities is perceived as certain form of guarantees for the quality of the strategic document.

Before it initiated the development of this strategy, the General Secretariat of the GRNM conducted a survey among experts from the academic community, law professionals, civil sector and the media (total of 7 questionnaires), and among 35 administrative officers that work in public relations or hold decision-making powers in requests for free access to information. The responses obtained to these questionnaires served as another indicator that confirmed the conclusions from the desktop analysis. However, having in mind the low number of surveyed respondents, no opinions were based solely on these questionnaire responses.

An Action Plan is an integral part of the Transparency Strategy of the GRNM (2019-2021).

⁸ Available at: <http://www.mioa.gov.mk/?q=mk/documents/open-government-partnership> [retrieved on 21.10.2019]



1.2.1 Scope of the strategy

The Transparency Strategy of the GRNM (2019-2021) covers the GRNM, ministries, bodies within ministries, independent state administration bodies, independent state bodies held accountable to the government (whose executive management is selected/appointed by the GRNM), administrative organisations held responsible before the government, and public enterprises founded by the GRNM and state-owned joint stock companies. Hence, in essence, the Transparency Strategy of the GRNM (2019-2021) does not cover only bodies formed under the Law on Organisation and Operation of State Administration Bodies ("Official Gazette of the Republic of Macedonia" no. 58/2000, 44/2002, 82/2008, 167/2010 and 51/2011, and the "Official Gazette of the Republic of North Macedonia" no. 96/2019 and 110/2019), but also those formed under separate laws. Some of these bodies are enlisted on the GRNM's official website.⁹

In addition, the GRNM appears as founder of 26 from 142 state-owned enterprises.¹⁰ All of them are also covered under this strategic document.

Appendix no.1 provides an overview of some bodies, organisations, public enterprises and state-owned joint stock companies that are covered under this strategy. The list given in Appendix no.1 is not exhaustive, i.e. it is intended only for illustrative purposes and for better understanding of this strategy by stakeholders and citizens.

⁹ Available at: <https://vlada.mk/node/14061> [retrieved on 6.9.2019].

¹⁰ See: <http://www.ccc.org.mk/images/stories/partizacijamk1.pdf> [retrieved on 9.9.2019].

2. VISION, MISSION, GOALS, BASIC TERMS AND PRINCIPLES IN THE TRANSPARENCY STRATEGY OF THE GOVERNMENT OF THE REPUBLIC OF NORTH MACEDONIA (2019-2021)

2.1. Mission and vision of the strategy

The Transparency Strategy of the GRNM (2019-2021) and its Action Plan originate from the **vision statement**:

Vision of the strategy

Developed trust of the citizens of the Republic of North Macedonia in the Government, i.e. ministries and other state administration bodies and executive government institutions, and creating an ambiance of transparency and trust

Mission of the strategy

The mission statement of this strategic planning document corresponds to the vision:

Exercise of citizens' right to full information about operation of GRNM, bodies and organisations held responsible before the government, and increased trust of citizens in executive government institutions held responsible before the government.

Hence, it becomes clear that two interrelated notions are of crucial importance in respect to the Transparency Strategy of the GRNM (2019-2021), and they are: (*) transparency and (*) trust. Namely, the question is raised how greater transparency will impact increased trust of citizens in the GRNM?

Mission of the strategy

In order to elaborate the positive effect that should be created by **transparency** on citizens' trust in the GRNM, first we need to define this term. Therefore, in establishing elements of transparency, the GRNM starts from theoretical literature, sources of international law, different legislation and comparative examples from strategic and developmental



documents.^{11,12,13,14} All these definitions have two common features: first, transparency is always and inevitably connected to democracy in the society, and second, it is closely related to citizens' right to request and obtain information on operation of their government and administration (understood in the broadest sense),¹⁵ i.e. transparency is related to the obligation of relevant institutions and bodies to disclose and publish data. In other words, GRNM recognizes that given political power/government/state administration body cannot be assessed as transparent without having fulfilled at least two preconditions: (*) citizens should be able to effectively exercise their right to request public information and should not face obstacles in that regard; and (*) there should be visible proactive disclosure of public data.¹⁶ However, the GRNM went further in establishing the elements of transparency and complemented the two above-elaborated preconditions with::

- disclosed or published information should be easy to use;
- access to information should not be equated to access to documents (citizens may dispose with documents, but getting to information is a serious challenge for them), i.e. citizens should be provided active assistance in finding specific data;
- access to information should not imply costs;
- citizens should receive active assistance in cases when they request access to public

11 For more information on definition of transparency, visit: <https://carnegieendowment.org/2014/10/20/accountability-transparency-participation-and-inclusion-new-development-consensus-pub-56968> [retrieved on 6.9.2019]

12. For more information on definition of transparency, see Michener G., Bersch K. (2013). Identifying transparency, *Information Policy* 18 (2018) 233-242, available at: <https://pdfs.semanticscholar.org/4ac7/5190784e6eec337d61ce86d45718a910bfaf.pdf> [retrieved on 6.9.2019]

13. For more information on definition of transparency, see Bellver A., Kaufmann D. (2005). *Transparency: Initial Empirics and Policy Adaptations*, World Bank Policy Research Working Paper, available at: https://www.google.com/search?q=Transparency+Transparency%3A+Initial&rlz=1C1GGRV_enMK758MK758&oq=Transparency+Transparency%3A+Initial&aqs=chrome..69i57.822j0j7&sourceid=chrome&ie=UTF-8 [retrieved on 6.9.2019]

14. Fifth Evaluation Round Report "Preventing Corruption and Promoting Integrity in Central Governments (Top Executive Functions) and Law Enforcement Agencies" adopted by GRECO at its 82nd plenary meeting (Strasbourg 18-22 March 2019), available at: <https://rm.coe.int/-/168095378e> [retrieved on 6.9.2019].

15. Danilovska-Bajdevska D., Petrovska M., Naumovska N. (ed.): *Overcoming the Principle of Secrecy in the Public Administration's Operation - Report from the Research Study on the Right to Public Information in Macedonia*, Foundation Open Society - Macedonia, pg.9, available at: <http://fosm.mk/CMS/Files/Documents/istrazuvanje-tajnost-vo-rabotnjeto-mkd-1.pdf> [retrieved on 6.9.2019].

16. Data that are subject of proactive publication differ from state to state, but in general, it could be said that most democratic systems comply with "10-Point Transparency Checklist" of the Illinois Policy Institute, available at: <https://www.illinoispolicy.org/10-point-transparency-checklist/> [retrieved on 6.9.2019].

information, in compliance with the principle of assistance to ignorant parties defined under Article 17 of the Law on General Administrative Procedure (“Official Gazette of the Republic of Macedonia” no. 124/2015);

- all draft regulations, other general administrative acts, and other documents that, directly or indirectly, impact citizens and their rights and obligations, and are adopted by the GRNM, ministries, bodies within ministries, other state administration bodies, administrative organisations and state bodies held responsible before the government should be published and made easily available;
- citizens should have insight in spending of budget funds, and budget revenue (amount collected from citizens based on taxes, fees and other charges).

Hence this strategic and developmental document addresses the issue of active transparency.

In continuation, this document elaborates the manner in which transparency will impact strengthened trust of citizens in the GRNM, bodies and organisations covered under this strategy.

Firstly, proactive publication of data will have positive effect on the citizens’ perceptions, i.e. will serve as method to make it clear that the GRNM and bodies covered under this strategy do not hide data about their operation and manner in which public (budget) funds are spent.

Secondly, publication of data and original documents in user-friendly formats will distinguish between transparency, on one side, and public relations, on the other side. The GRNM firmly believes that all citizens and actors in the society will not be able only to receive one-sided press releases on its activities but will also be given insight into the original documents from which data have been extracted.

Thirdly, the proactive publication of data, especially publication of draft regulations, will stimulate citizens’ participation in policy-making (directly or through civil society organisation and other association forms), which will increase their trust in the quality of regulations and other acts.

Based on the above, in continuation, this document defines several important terms and notions and details the basic principles of this strategy.



2.2. Basic terms and principles of the strategy

In addition to transparency, defined in the previous section, several other terms and notions are important for this strategic document, as detailed below.

- **Active transparency:** Also called voluntary, active transparency implies publication of data by the GRNM and state administration bodies whereby citizens, legal entities, the media, etc. do not have to use the mechanisms for free access to information established by the relevant law (Law on Free Access to Public Information published in "Official Gazette of the RNM" no. 101/2019).¹⁷
- **Accountability:** Accountability is closely related to transparency. If transparency is defined as active publication of data by the GRNM and state administration bodies, then accountability determines institutional relations among several factors in order to establish when some of them should be sanctioned for their actions or failure to perform assigned tasks and objectives. In the case of state administration bodies, accountability can be horizontal and vertical.¹⁸ Horizontal accountability concerns institutional relations among bodies, whereby some of them control the others. Vertical accountability concerns relations between citizens and state administration bodies.
- **Inclusiveness and participation:** Generally speaking these notions imply that conditions are secured for broad coverage of informed citizens, but also consultations with them in cases when policies and decisions are taken (understood in the broadest sense).¹⁹ For the purpose of this strategy, participation will only be understood in its indirect form. In particular, it will not anticipate measures aimed to increase citizen participation in policies and decisions (understood in the broadest sense, not as specific administrative acts), but proactive publication of data by means of unified approach that will have positive effect on this matter. In other words, this refers to the fact that it is more likely for citizens to participate in the creation of policies and decisions when they have timely information about the processes which take place at the GRNM and other public bodies.

¹⁷ Michener G., Bersch K. (2013). Identifying transparency, *Information Polity* 18 (2018) 233-242, достепен на: <https://pdfs.semanticscholar.org/4ac7/5190784e6eec337d61ce86d45718a910bfaf.pdf> (веб-страницата е последен пат посетена на 8.7.2019)

¹⁸ Cerna L. (2014). Trust: What it is and Why it Matters for Governance and Education, OECD Education Working Papers, no. 108, OECD Publishing, available at: https://www.oecd-ilibrary.org/education/trust-what-it-is-and-why-it-matters-for-governance-and-education_5jxswcg0t6wl-en [retrieved on 8.7.2019].

¹⁹ For more information, see: <https://www.undp.org/content/undp/en/home/2030-agenda-for-sustainable-development/peace/governance/inclusive-political-processes.html> [retrieved on 8.7.2019]

The Transparency Strategy of the GRNM (2019–2021) is based on several principles, as follows:

- **Comprehensiveness:** For the purpose of this strategic document, comprehensiveness has two dimensions: firstly, it concerns the GRNM, all ministries, bodies within ministries, independent state administration bodies, independent state bodies, administrative organisations held accountable to the government, public enterprises founded by the GRNM and state-owned joint stock companies; and secondly, it will cover all data with the exception of those which, pursuant to the law, are not considered public information.
- **Unification:** In compliance with definition of transparency, it is necessary for data to be published in manner that will facilitate their use by citizens, business entities, the media, etc. Hence, efforts will be taken to establish the format in which data should be published and disclosed to the public, i.e. layout and structure of official websites hosted by bodies covered under this strategy so that citizens would not have to face different practices in this regard.
- **Data usability:** The GRNM and public bodies will publish data in a manner and format that allows them to be easily used by citizens, i.e. interested parties.
- **Timeliness:** Timeliness is one of the basic principles in this strategic document. Namely, it is based on the value commitment whereby it is not sufficient for data to be published, but they should also be published in due time, i.e. within the shortest time possible after they are created, i.e. after they are obtained by the relevant bodies.
- **Internet as a main source:** At times of fast-paced technology development, it is necessary to adopt the general principle that the internet is a main source of data and information. Accepting the internet as the main source of information also has a positive impact on environment protection.
- **Default openness:** Data that will be covered under this strategy, by default, will be considered open for the public.
- **Publication of documents:** The GRNM and public bodies will have to publish data on their operation, (according to the previously defined check list and the principle of usability), but also documents from which these data have been extracted. In that, citizens will not only have the role of information recipients, but will also be able to examine whether imparted information is accurate (for example, when the ministry's website offers data on the minister's salary, the relevant documents on what basis this salary is calculated should also be made available).
- **Non-discrimination:** The principle of non-discrimination means that all interested persons have equal access to data covered under this strategy. No entities/persons should be requested to register or be identified or to justify their access to data. Also, there will be no restrictions in regard to use of software or applications for access to information or data. In addition, pursuant to the principle of non-discrimination, bodies and organisations



covered under this strategy should also ensure access to data for members of vulnerable categories and persons with disabilities. In that, due consideration should be made of the principle of equality, impartiality and objectiveness (Art. 8), the principle of service orientation of public bodies (Art.9), and the principle of assistance to ignorant parties (Art. 17) from the Law on General Administrative Procedure..

3.MONITORING AND REPORTING

In order to ensure the successful implementation of the Transparency Strategy of the GRNM, a working group will be established and tasked to monitor its implementation.

The working group tasked to monitor the implementation of the Transparency Strategy of the GRNM (2019-2021) will be of a broad composition, i.e. it will comprise of representatives from a number of institutions, as follows:

- Cabinet of the Minister without Portfolio in charge of Communications, Accountability and Transparency;
- General Secretariat of the GRNM;
- ministries;
- academic community (universities and other scientific institutions);
- civil society sector (citizens' associations and foundations);
- the media, and
- business community..

he working group will comprise of 7 members and will be formed by the Minister in charge of Communications, Accountability and Transparency. Members of this working group representing the academia, media and business community will be nominated by the Interuniversity Conference, economic chambers and journalist associations. Representatives of the non-governmental sector will apply to the open call announced by the Council for Cooperation between the Government of the Republic of North Macedonia and Civil Society.

This working group will continuously monitor the implementation of the Transparency Strategy of the GRNM (2019-2021), i.e. it will monitor whether the measures and activities anticipated under the Action Plan are realised within the assigned deadlines. Moreover, the working group will propose initiatives on awareness building and information dissemination on active transparency and will support, i.e. will advise the bodies and organisations covered under the Transparency Strategy of the GRNM about the manner in which they can better comply with their obligations. The working group will collect information on implementation of the Transparency Strategy of the GRNM (2019-2021) through meetings and official correspondence for the purpose of obtaining reports on the realisation of measures and activities.

In addition to this working group, as a form of external mechanism for the successful strategy implementation, an organisation unit on strategic development and transparency will be formed by the General Secretariat of the GRNM,²⁰ and tasked with the collection and analysis of data related to the implementation of this strategic document, i.e. active transparency. This organisation unit will draft quarterly reports on the implementation of the Transparency Strategy of the GRNM (2019-2021), i.e. the Action Plan, which the General Secretariat will submit to the Minister without Portfolio in charge of Communications, Accountability and Transparency. Later in this document more information is provided about the formation and operation of this organisational unit. Finally, the Minister without Portfolio in charge of Communications, Accountability and Transparency will present the GRNM with semi-annual reports on the strategy implementation. These reports will be reconsidered at regular sessions of the GRNM. The Minister without Portfolio in charge of Communications, Accountability and Transparency will draft the above reports on the basis of quarterly reports from the General Secretariat of the GRNM and based on data obtained from the working group tasked to monitor the strategy implementation.



²⁰ The organogram is available at: https://vlada.mk/sites/default/files/dokumenti/organogram_na_generalniot_sekretariat.pdf [retrieved on 8.9.2019].

Section 2:

Strategic commitments
of the Government of the
Republic of Macedonia for
the period 2019-2021

3. ACCESS TO PUBLIC INFORMATION

3.1. Situation analysis

The right to free access to information is stipulated under Article 16, paragraph 3 of the Constitution of the Republic of North Macedonia. The first Law on Free Access to Public Information was adopted in 2006 (“Official Gazette of the Republic of Macedonia” no. 13/2006, 86/2008, 6/2010, 42/2014, 148/2015, 55/2016 and 64/2018, and “Official Gazette of the Republic of North Macedonia” no. 98/2019). In 2019, the Parliament of the Republic of North Macedonia adopted a new Law on the Free Access to Public Information (“Official Gazette of the Republic of North Macedonia” no. 101/2019). This law is still not in effect because of a provision under Article 46 which stipulates delayed enforcement of the law by six months from the day when the law is adopted (30.5.2019), or in other words, it will enter in effect on 30.11.2019. The GRNM proposed adoption of the new law is in 2019. The main reason for the adoption of this new regulation concerned incomplete and insufficient implementation of the existing Law on Free Access to Public Information which was adopted in 2006, i.e. as the GRNM enlisted in its rationale for the proposed law before the Parliament: “Although the Law on Free Access to Public Information integrates the principles that provide the basis for the right to free access to information, in practice, the law is inconsistently and incompletely enforced; there is limited transparency of institutions, while natural persons and legal entities insufficiently exercise the right to free access to information”. In that context, the GRNM demonstrates commitment to improve the instrument for free access to information. That would not only improve the democratic climate in the state but will also adequately respond to remarks made by the international community, especially by GRECO. Notably, GRECO’s Fifth Round Evaluation Report enlists that “the evaluation team is aware of the weak and ineffective implementation [of the Law on Free Access to Public Information]”.²¹ There are several key differences between the old and new law on free access to information, those being the:

- list of information holders is expanded;
- deadlines for access to information are shortened;
- Commission for Protection of the Right to Free Access to Public Information

²¹ Fifth Evaluation Round Report “Preventing Corruption and Promoting Integrity in Central Governments (Top Executive Functions) and Law Enforcement Agencies” adopted by GRECO at its 82nd plenary meeting (Strasbourg 18-22 March 2019), available at: <https://rm.coe.int/-/168095378e> [retrieved on 6.9.2019].



(hereinafter CoFAI) is transformed into independent body, i.e. Agency;

- obligation is stipulated for proactive publication of documents and data on websites of all bodies.

The Law on Free Access to Public Information from 2019 includes a series of new points. The efficient and adherent enforcement of provisions contained in this law is one of the GRNM's priorities, as a step forward to advance its transparency, i.e. to increase accountability of the government and of other bodies and organisations covered by the law.

3.1.1. Challenges

According to the situation analysis conducted for the purpose of developing this strategic document, several challenges are identified in regard to access to public information.

The first challenge concerns the **principle of delegated authority for decision-making in procedures initiated upon requests for access to public information**. The existing (adopted in 2006) and the new (adopted in 2019) Law on Free Access to Public Information stipulate that all information holders should have one or more authorised officers tasked to facilitate the right to free access to information. The Law on General Administrative Procedure stipulates that, by rule, decision-making powers in administrative matters at public bodies should be delegated to authorised officers. In other words, the Law on General Administrative Procedure recognises that public officials at public bodies should not decide about rights, obligations and legal interests in the administrative procedure, but these should be entrusted to authorised officers that are employed at relevant bodies and perform their tasks and duties in a professional manner. This aims to achieve greater professionalism and reduce the possibilities for abuse of decision-making powers. Hence, when citizens submit requests for free access to information, decisions (to grant or to reject access) should not be taken by public officials (ministers, directors and the like), but by authorised officers tasked to facilitate the right to free access to information. Nevertheless, field analyses show that the principle of delegated authority for decision-making is still not sufficiently respected in administrative procedures and, consequently, in procedures initiated upon requests for free access to information. At its 120th regular session held on 12 February 2019, the GRNM established this situation and tasked the state administration bodies that lead administrative procedures to comply with the principle of delegated authority.²² The GRNM remains committed to the full implementation of the principle of delegated authority, including in procedures on free access to information. It is expected that, in the future, public officials will not approve access to information or sign decisions which, partially or fully, limit access to information, which means this will be completely delegated to authorised officials tasked to facilitate the right to free access to information. That is the only way for these procedures to be fully professionalised, which will reduce the possibilities for abuse of decision-making powers and risks from making mistakes.

²² Minutes from GRNM's 120th session, available at: <https://vlada.mk/sednica/120> [retrieved on 9.9.2019].

Table no.2: Administration silence as reason for submission of appeals before CoFAI in the last ten years²³

The second challenge concerns **frequent cases of administration silence in submitted requests for free access to information.**

Year	Appeals to CoFAI on the grounds of administration silence	Total number of appeals
2018	366	622
2017	569	758
2016	411	619
2015	874	960
2014	785	849
2013	428	564
2012	907	1,225
2011	324	409
2010	368	540
2009	273	340

The third challenge concerns the **compliance with law provisions that stipulate the deadline for response to any requests for free access to information.** In that regard, it had already been stressed that, under the previous law, deadlines for response to requests for free access to information were between 10 and 30 days (depending on the fact whether the request is submitted in oral or written form), and the new law stipulates shortened deadlines of between 5 and 20 days (depending on the fact whether the request is submitted in oral or written form). However, these are not defined as minimum, but as maximum deadlines. Both the existing and the new Law on Free Access to Public Information stipulate that responses should be provided immediately and by expiration of given deadlines at the latest. On the contrary, the expert public and civil society organisations have continuously indicated that information holders wait for the maximum deadline to expire before they disclose the requested information,²⁴ irrespective of the fact whether that period of time is actually needed to locate, i.e. to disclose requested information. Such practices have

²³ Data are compiled from CoFAI's annual operation reports, available at: <http://komspi.mk/%d0%b3%d0%be%d0%b4%d0%b8%d1%88%d0%bd%d0%b8-%d0%b8%d0%b7%d0%b2%d0%b5%d1%88%d1%82%d0%b0%d0%b8/> [retrieved on 9.9.2019].

²⁴ According to the research conducted by the Center for Civil Communications in 2017, the average number of days to obtain response to requests for free access to information is calculated at 20 days. In addition, 24% of ministries submitted responses beyond the stipulated deadline, 59% of them responded with the law-stipulated deadlines, while 17% of them did not respond to information requests. For more information, see: <http://ccc.org.mk/images/stories/ia2017m.pdf> [retrieved on 8.9.2019].



demotivated citizens, but also journalists to submit requests for free access to information.²⁵ The information holders need to change their practices, especially those held responsible before the GRNM and covered under this strategic document, in particular by responding to any information requests within the shortest deadline possible.

The fourth challenge concerns the **form in which requests for free access to information are submitted**. Both the existing and new Law on Free Access to Public Information stipulated the possibility for information requests to be submitted in oral, written or electronic form, but citizens were often allowed to submit requests only in written form.

The fifth challenge is related to **active transparency as stipulated under Article 10, paragraph 1 of the Law on Free Access to Public Information, i.e. the obligation for all information holders to publish more documents and data on their websites**.

It is necessary to indicate that challenges also included **insufficient knowledge on the part of information holders about provisions from the Law on Free Access to Public Information**. Here, due consideration should be made owing to the complexity of this subject matter, i.e. the fact that a large portion of the obligations arising from the law require serious expertise and capacity. An example in that regard is seen in the implementation of the so-called harm test.

3.1.2. Strategic commitments

According to the legal framework that's in place, but also the challenges detailed above, this document defines several strategic commitments aimed to improve an effective exercise of the right to free access to information in the wake of the application of the new law. They include active transparency, i.e. the obligation of information holders under Article 10, paragraph 1 of the Law on Free Access to Public Information from 2019:

- Full implementation of the principle of delegated authority for decision-making in procedures initiated upon requests for free access to information pursuant to Article 13 and Article 24 of the Law on General Administrative Procedures, i.e. in the context of previously referred conclusion adopted by the GRNM at its 120th regular session.²⁶
- Promotion of the practice by the GRNM, ministries, bodies within ministries, independent state administration bodies, administrative organisations and independent state bodies held accountable to the government, in procedures on free access to information, by developing manuals and other didactic materials for public officials and authorised officers, which would address adherent application of the principle of delegated authority, deadlines and stages in the procedures on

²⁵ Bozhovikj S., Danilovska D. (2018). Preliminary Report on Implementation of the Law on Free Access to Public Information, Metamorphosis Foundation; pg.16, available at: <http://metamorphosis.org.mk/wp-content/uploads/2018/04/1.5-Preliminaren-izveshtaj-sloboden-pristap.pdf> [retrieved on 9.9.2019].

²⁶ Available at: <https://vlada.mk/sednica/120> [retrieved on 9.9.2019].

free access to information, possibility for submission of oral, written and electronic information requests, and consequences from unlawful or inadequate actions.

- Establishment of partnership relation between the GRNM and the Agency, primarily in regard to regular exchange of information on (non)performance on the part of bodies which, in compliance with legal provisions, are held accountable to the government, about relevant public officials that could be called to account before the GRNM (which does not exempt their responsibility before Parliament), and in regard to conducting analyses on implementation of the Law on Free Access to Public Information.
- Establishment of mechanisms by means of which the GRNM will control whether ministries, bodies within ministries, independent state administration bodies, administrative organisations and independent state bodies held accountable to the government have submitted annual reports to the Agency (currently CoFAI).

The Action Plan, which is an integral part of the Transparency Strategy of the GRNM (2019-2021), anticipates specific measures and activities for each of these strategic commitments, including relevant indicators to monitor their implementation.

The last strategic commitment under this section of the Transparency Strategy of the GRNM (2019-2021) should be considered in correlation to the commitment for unification of websites (elaborated below).



4. ACTIVE TRANSPARENCY OF THE GOVERNMENT AND OTHER EXECUTIVE GOVERNMENT BODIES

4.1. Situation analysis

In 2011, the GRNM joined the Open Government Partnership. In that context, the GRNM adopted the Open Government Partnership's National Action Plan²⁷ which, inter alia, addresses the issues of government openness and active transparency.

In the last two years, the GRNM has taken numerous efforts to improve its active transparency, i.e. to create practices for the proactive publication of data. The idea for proactive publication of data brings multiple benefits to both, citizens and institutions. Citizens will be able to obtain information on legislation, regulations and bylaws adopted by relevant bodies, about their rights and obligation, i.e. information that would enable them to hold public officials accountable. On the other hand, institutions will be more responsible in spending public funds, thus promoting the principles of good governance and integrity. As part of its competences, the GRNM has undertaken several activities aimed at strengthening the active transparency of ministries, bodies within ministries, and other state and administrative bodies, i.e. administrative organisations held responsible before the government. Nevertheless, the GRNM recognises that its active transparency (i.e. active transparency of bodies held accountable to the government) remains key challenge. Namely, as shown by research studies conducted by civil society organisations, in recent years, the executive government of the Republic of North Macedonia has been the least open compared to other governments in the region of Southeast Europe, with a score of only 36%.²⁸ At the level of individual institutions, the GRNM's openness is assessed with a score of 52%. Although a large portion of recommendations made by civil society organisations²⁹

²⁷ Available at: <http://www.mio.gov.mk/?q=mk/documents/open-government-partnership> [retrieved on 8.9.2019].

²⁸ See: Metamorphosis. (2017). Roadmap on Good Governance for State Institutions in the Republic of Macedonia - On the Basis of the Regional Index of Openness of State Institutions, available at: https://resource.actionsee.org/app/uploads/2018/07/Action_SEE_MK_08-08-2017-english-version.pdf.

²⁹ Danilovska D., Naumovska N. (2017). Proposals to Improve Current Situation - Openness of Executive Government Institutions in the Region and in Macedonia, Metamorphosis Foundation, available at: <https://resource.actionsee.org/app/uploads/2018/07/%D0%B7%D0%B0-%D0%BE%D1%82%D0%B2%D0%BE%D1%80%D0%B5%D0%BD%D0%BE%D1%81%D1%82-%D0%BD%D0%B0-%D0%B8%D0%B7%D0%B2%D1%80%D1%88%D0%BD%D0%B0%D1%82%D0%B0-%D0%B2%D0%BB%D0%B0%D1%81%D1%822.pdf> [retrieved on 7.9.2019].

have been implemented by the GRNM, bodies that are held accountable to the government still lack a proactive approach. Therefore, additional efforts are needed, which complies with the commitments under the Open Government Partnership and OGP National Action Plan 2018-2020.³⁰

All above-indicated commitments are systematised in this strategic document.

One of the basic principles under the Transparency Strategy of the GRNM (2019-2021) is the use of the internet as a primary source of information on operation of the GRNM and all bodies and organisations covered under this strategy. That is also in compliance with the Law on Free Access to Public Information adopted in 2019, in particular Article 10, paragraph 1 of the Law, which stipulates that all information holders are obliged to publish on their websites, a large range of documents and information.

On its official website, the GRNM regularly publishes a high volume of data related to its operation and activities. They are found on the website section “Open Government”.³¹ The contents hosted under this website section include: (1) agendas and minutes from the GRNM sessions; (2) data on salary brackets for members of the GRNM; (3) asset declarations for members of the GRNM; (4) reports on the operation of the GRNM (100 days, 1 year and 2 years after formation of the current government); (4) budget of the GRNM; (5) plans for public procurements; (6) reports on budget execution; (7) audit reports (by 2012); (8) service information about the GRNM; (9) data relevant for whistleblower protection and personal data protection in compliance with relevant legislation; (10) data on the submission method of requests for free access to information, including a manual for the submission of requests for free access to information, information request templates and data on authorised officers tasked to facilitate access to information; (11) Rulebook on Internal Organisation of the GRNM and Rulebook on Systematisation of Job Positions of the GRNM from 2015, with all 18 amendments thereto, by 15 July 2019; (12) organogram of the GRNM; (13) list of employees at the GRNM (including Cabinet of the President of the GRNM and the General Secretariat); (14) the GRNM’s Communication Strategy 2019/2020; (15) graphic standards for the GRNM and its ministries; (16) draft plan on decisive action against disinformation; (17) relevant legislation, including the Law on Government of the Republic of Macedonia (without amendments from 2018), Law on Organisation and Operation of State Administration Bodies (without amendments from 2019), and Law on Whistleblower Protection (basic text); (18) bylaws pertaining to operation of the GRNM; (19) Code of Conduct for Members of Government and Public Office Holders Appointed by the GRNM; and (20) Open Government Partnership’s National Action Plan 2018-2020.

In addition, the GRNM *launched the accountability tool on work expenses by public office holders*.³² This tool provides insight in work-related expenses of the President and Deputy Presidents of the GRNM, ministers, deputy minister, Secretary General of the GRNM

30 Available at: <http://www.mio.gov.mk/?q=mk/documents/open-government-partnership> [retrieved on 8.9.2019].

31 Available at: <https://vlada.mk/otvorena-vlada> [retrieved on 6.9.2019].

32 Available at: <https://vlada.mk/otchetnost-troshoci> [retrieved on 6.9.2019].



and state secretaries at ministries. The accountability tool is easy to use and allows data browsing by several criteria (year, body, official, type of cost, and hosts monthly reports by the relevant officials, i.e. a narrative elaboration of indicated costs and expenses). Hence, the accountability tool significantly increases the transparency of the GRNM and ministries, bearing in mind that officials are aware that the public has insight into their work expenses.

As regards to public procurements, it is important to note that all budget beneficiaries and public enterprises are obliged to publish documents on their public procurements in the Electronic Public Procurement System,³³ hosted and maintained by the Bureau of Public Procurements. In that, pursuant to Article 10, paragraph 1 of the Law on Free Access to Public Information from 2019, they are obliged to publish procurement notices, tender documents and public procurement contracts.

The platform “Open Treasury” is launched and publishes all state costs and expenditure, i.e. this platform allows default publication of all transactions from the state treasury and makes them available to be monitored. This effort addressed one of main anomalies, i.e. a low level of active transparency in regard to budgetary and financial operations.³⁴ In that, data published on the platform “Open Treasury” are considered public information pursuant to the Law on Amending the Law on Free Access to Public Information (“Official Gazette of the Republic of North Macedonia” no. 98/2019), i.e. the last round of amendments to the Law on Free Access to Public Information from 2006. Hence, the launch of this tool necessitated the Law on Free Access to Public Information (“Official Gazette of the Republic of North Macedonia” no. 101/2019) to come into effect.³⁵

All ministries, except for the last one formed, i.e. Ministry of Political System and Inter-Community Relations, have functional websites. These websites can be accessed independently and through hyperlinks hosted on the GRNM’s website.³⁶ The websites of individual ministries include a high volume of data on their operation, in compliance with the obligation for publication of 21 documents and data. As regards bodies within ministries, only a few of them have separate websites, basic data for some are hosted on websites of relevant ministries, and in the case of a very small number of these bodies it is difficult to find information about them on the internet. Independent state administration bodies and administrative organisations, shown in overview no.1 of this strategy, have individual websites.

33 Available at: <https://e-nabavki.gov.mk/PublicAccess/Home.aspx#/home> [retrieved on 6.9.2019].

34 See: <http://ccc.org.mk/images/stories/ia2017m.pdf> [retrieved on 8.9.2019].

35 Available at: <https://open.finance.gov.mk/mk/home> [retrieved on 7.10.2019]

36 See: <https://vlada.mk/ministerstva> [retrieved on 7.9.2019].

According to the GRNM, publication of the first “citizen’s budget” was of great importance, especially because it allows easy and user-friendly format for detailed information about the state budget. In addition to the designated website,³⁷ an application was also developed for the citizen’s budget, which in the past was indicated in basic recommendations from the civil society sector.³⁸

In compliance with the Open Data Strategy (2018-2020), the open data portal of the GRNM was launched,³⁹ and its primary goal is to host datasets from institutions in open format, hence ensuring greater transparency, utilisation of economic potential data, and increased efficiency of institutions. Inter alia, the open data portal is aimed to reduce the number of requests for free access to information by means of proactive publication of information by the institutions. At the same time, the open data portal should increase participation of citizens in policy-making and analysis of the results achieved. The interactive character of this portal is seen by the fact that all citizens can register and post remarks and comments, but also make requests for publication of data that have not been disclosed at that time. This recognises the active role of civil society, i.e. individual citizens in controlling data published by the GRNM and bodies covered under this strategic document.

37 Available at: <http://budget.finance.gov.mk/> [retrieved on 7.9.2019].

38, Danilovska D., Naumovska N. (2017). Proposals to Improve Current Situation – Openness of Executive Government Institutions in the Region and in Macedonia, Metamorphosis Foundation, available at: <https://resource.actionsee.org/app/uploads/2018/07/%D0%B7%D0%B0-%D0%BE%D1%82%D0%B2%D0%BE%D1%80%D0%B5%D0%BD%D0%BE%D1%81%D1%82-%D0%BD%D0%B0-%D0%B8%D0%B7%D0%B2%D1%80%D1%88%D0%BD%D0%B0%D1%82%D0%B0-%D0%B2%D0%BB%D0%B0%D1%81%D1%822.pdf> [retrieved on 7.9.2019].

39 Available at: <https://data.gov.mk/> [retrieved on 7.9.2019].



4.1.1. Challenges

The GRNM is aware that, despite the large number of efforts to improve transparency of its operation, i.e. operation of ministries, bodies within ministries, independent state administration bodies, administrative organisations and independent state bodies held accountable to the government, there are still serious risks related to the proactive publication of data on the internet. In that context, reference should be made to research studies conducted by civil society organisations during 2017, which resulted in assessments showing that active transparency is low, bearing in mind that the compliance score for 97 institutions with obligations on active publication of information was 42.5%.⁴⁰ Although some progress has been noted since 2017 to the point when this strategic document was developed, some challenges still remain. In continuation, this strategic planning document details some of them.

The first challenge is related to the **non-unification of websites of the GRNM and ministries**. Namely, the analysis conducted for the purpose of developing the Transparency Strategy of the GRNM (2019-2021) concluded that almost all of these websites have a different design which, in its own right, would be a challenge for citizens, civil society organisations and foundations, the media and any other entities interested in finding data about their operation. Moreover, there are no standards in place about which languages in which websites should be made available.

The second challenge is related to the absence of an equal number of data on websites of all ministries. This had already been noted (several times) by civil society organisations whose research studies have indicated dramatic differences in ranks of individual institutions according to their active transparency.⁴¹ In other words, in addition to different designs and structure among ministries' websites, differences were also observed in terms of the data published on their websites. At its 34th session, the GRNM tasked all ministries to publish at least 21 documents on their websites.⁴² In addition, Article 10, paragraph 1 of the Law on Free Access to Public Information from 2019, which will come into effect in November this year, expanded the list of documents and information, but also broadened its coverage to include other information holders in addition to ministries. However, not all ministries have fully complied with this instruction provided by the GRNM.⁴³ Here, we detail several examples:

- Some ministries have not published the list of all employees with contact information (e-mail and telephone) on their respective websites.⁴⁴

40 Filkov G., Fakikj S., Mitevski M. (2017). Index of Active Transparency, Center for Civil Communications, available at: <http://ccc.org.mk/images/stories/ia2017m.pdf> [retrieved on 8.9.2019].

41 Filkov G., Fakikj S., Mitevski M. (2017). Index of Active Transparency, Center for Civil Communications, available at: <http://ccc.org.mk/images/stories/ia2017m.pdf> [retrieved on 8.9.2019].

42 The minutes are available at: <https://vlada.mk/sednica/34> [retrieved on 9.9.2019].

43 Different level of active transparency among individual ministries is addressed under research studies conducted under the project Action SEE, available at: <https://opennessindex.actionsee.org/country/Macedonia> [retrieved on 8.9.2019].

44 For reference, see: <http://www.pravda.gov.mk/resursi/20> [retrieved on 8.9.2019].

- A large number of ministries, but also other bodies and organisations covered under this strategy, have not published on their websites consolidated texts of the laws that are important for their operation. Some of them have published original texts of the laws, but not amendments thereto, and some ministries have published original texts with all amendments, but not the consolidated version. Some websites host consolidated texts of the laws but they do not encompass all amendments, i.e. they include some amendments (by 2015 or by 2014).⁴⁵ The same is observed in regard to secondary legislation (bylaws) that governs the operation of ministries, i.e. other bodies and organisations covered under this strategy.

Several ministries have published their annual budgets, but not end-of-year reports on budget execution.⁴⁶

The non-unified approach on the part of ministries regarding the publication of data is duly noted in research studies conducted by civil society organisations, especially those under the Action SEE project, which established different level of openness among individual ministries.⁴⁷

There are no doubts that non-uniformity among ministries should be addressed in the wake of the upcoming enforcement of the Law on Free Access to Public Information from 2019.

The third challenge is related to the bodies within ministries. This document already noted that (although they are information holders pursuant to the Law on Free Access to Public Information from 2019) some of them do not have websites where they can publish data on their operation. Below, we list some of these bodies:

- Administration for Railway System Security (for which data can be found only on the website of the Ministry of Transport and Communications);
- Administration for Property and Legal Affairs (for which data can be found only on the website of the Ministry of Finance);
- Phytosanitary Administration (for which data can be found only on the website of the Ministry of Agriculture, Forestry and Water Economy).

This list is not exhaustive and is intended only for illustration purposes.

The fourth challenge concerns the **upgrade to the accountability tool on work expenses of public office holders**. Although this tool is a positive example for greater transparency of the GRNM and ministries, it should be noted that, at this moment, the accountability tool does not cover other public office holders at bodies within ministries, independent

⁴⁵ For reference, see: <http://mtsp.gov.mk/zakoni.nspj> [retrieved on 8.9.2019]; [http://www.economy.gov.mk/Upload/Documents/Zakon%20za%20uslugi%20\(3\).pdf](http://www.economy.gov.mk/Upload/Documents/Zakon%20za%20uslugi%20(3).pdf) [retrieved on 8.9.2019]; <http://zdravstvo.gov.mk/zakon-za-zdravstvenata-zashtita/> [retrieved on 8.9.2019], etc.

⁴⁶ For reference, see: <http://mtsp.gov.mk/informacii-od-javen-karakter.nspj> [retrieved on 8.9.2019].

⁴⁷ For reference, see: <https://opennessindex.actionsee.org/country/north-macedonia> [retrieved on 8.9.2019].



state administration bodies, administrative organisations or independent state bodies held accountable to the government.

The fifth challenge is related to the **external associates and personal advisors** to the President of the GRNM. They are engaged based on the Prime Minister's decision for establishment of his/her cabinet. Bearing in mind that these people are not engaged pursuant to the Law on Public Sector Employees, i.e. bearing in mind that there are no limitations in terms of the number of advisors engaged, no prohibitions are in place for recruitment of family relatives to these positions or these offices do not imply full-time working hours, the need emerges for the proactive publication of data related to them, as follows:

- their names and contract benefits (including salary);
- in cases of part-time or ad-hoc engagements, data should include information about main tasks/activities.

This commitment addresses GRECO's recommendations from the Fifth Evaluation Round Report.⁴⁸

The sixth challenge concerns **data on public procurements**, and here it should be noted that relevant sections on the websites of the GRNM, ministries and other bodies covered under this strategic document should be linked to the Electronic Public Procurement System, hosted and maintained by the Bureau of Public Procurements, thereby allowing citizens access to relevant data from all websites. When establishing these hyperlinks, due consideration should be made to avoid duplication of data.

The seventh challenge is related to the **regular updates to the open data portal of the GRNM**. The relevant analysis of this portal found nine groups of information (collections of datasets on particular topics), but the only complete group is titled: "agriculture, forestry, fishery and food". Hence, it is evident that institutions still perceive publication of open data as an obligation, instead of a practice that is of benefit to them also. Namely, if data are already published, there would be a smaller need for citizens to submit requests for free access to information.

The eighth challenge concerns the **low level of awareness among citizens about their right to obtain, i.e. dispose with information on operation of GRNM and all bodies and organisations held accountable to the government**. The research survey conducted by civil society organisations⁴⁹ on a representative sample of citizens (more than 1,200 respondents) has established that the majority of them do not have adequate knowledge about their right to free access to information. For example, every third respondents indicated that "they do not have the right to request information from healthcare institutions and from state authorities". In addition, a high share of citizens expressed scepticism about the right to free

48 Available at: <https://rm.coe.int/-/168095378e> [retrieved on 9.9.2019].

49 Danilovska-Bajdevska D., Petrovska M., Naumovska N. (ed.) (2013). Overcoming the Principle of Secrecy in the Public Administration's Operation – Report from the Research Study on the Right to Public Information in Macedonia, Foundation Open Society – Macedonia, available at: <http://fosm.mk/CMS/Files/Documents/istrazuvanje-tajnost-vo-rabotenjeto-mkd-1.pdf> [retrieved on 6.9.2019].

access to information, i.e. over one quarter of them (28%) reported they had not requested public information because they believed the requested information would not be disclosed; 16% had not requested information because they did not know where to address such requests; 7% were discouraged because they had no money; and 16% because they did not have time. Low awareness about the right to request public information is also observed in reports published by CoFAI, where it is noted that, without any exception, entities that lodge appeals are mainly civil society organisations. Moreover, low awareness about the right to free access to information is evident from the fact that citizens are less knowledgeable about the principle of active transparency, i.e. that they should have access to large volumes of data on the websites of relevant bodies. In addition, previously listed challenges (frequent cases of administration silence in procedures on free access to information, non-uniformed websites, etc.) are indicative of the fact that there is also unsatisfactory awareness about this right on the part of bodies and organisations covered under this strategy.

The ninth challenge is related to the **lack of an organisation unit at the GRNM tasked to monitor ministries and other bodies** in regard to their active transparency. Namely, although, at its 34th session, the GRNM tasked all ministries to publish at least 21 documents and data on their websites, the government's internal organisation does not include a separate unit that will regularly monitor ministries and other bodies. This is deemed necessary bearing in mind that the list of 21 documents and data is translated into Article 10, paragraph 1 of the Law on Free Access to Public Information.



4.1.2. Strategic commitments

Based on the above challenges, the GRNM recognises and defines several strategic commitments:

- Alignment of type and number of documents, i.e. data published by the GRNM and other bodies and organisations covered under this strategic document, which should be achieved on the basis of previously defined standards about which documents and data should be published and, as a minimum, they should include:
 - data on the relevant body, address of its seat, competences performed by the body, public officials at the body and their work biographies;
 - basic contact information, including telephone number, fax number, e-mail address and website location;
 - basic contact information for authorised officer tasked to facilitate access to information pursuant to Article 10, paragraph 1 of the Law on Free Access to Public Information;
 - list of employees, including official e-mails and telephone numbers;
 - list of special advisors, i.e. persons engaged to provide contracted service (if any), including their names and relevant professions, engagement duration and purpose, including special contract rights;
 - daily schedule of public officials, which should be updated every day;⁵⁰
 - consolidated texts of the laws that govern competences of the body or the organisation;
 - consolidated texts of all rulebooks (rulebook on internal organisation, rulebook on systematisation of job positions, rulebook on protected whistleblowing, etc.), decrees, orders, manuals, plans, programs, decisions, and other types of acts on enforcement of laws and other regulations;
 - organogram of the internal organisation;
 - strategic plans and strategies implemented by the body or the organisation;
 - annual work plans and programs;
 - annual budget and end-of-year budget account;
 - annual financial plans per quarter and programs on budget execution;
 - annual plan for public procurements;
 - audit reports;
 - types of services provided by the body or organisation pursuant to Article 10,

⁵⁰ This practice was observed with high-ranking officials in the United States. More information is available at: <https://factba.se/> [retrieved on 9.9.2019].

paragraph 1 of the Law on Free Access to Public Information;

- tariff list for service charges;
- method for submission of requests for free access to information;
- complete documents on public procurements, identical to those submitted to the Bureau of Public Procurements and published in the Electronic Public Procurement System;
- draft programs, opinions, views, studies and other documents falling under the competences of the body or the organisation, and press releases for the initiation of processes on drafting regulations;
- operation reports submitted by the body or the organisation, but also operation reports submitted to them;
- statistical data on operation and other information on measures and activities that impact the everyday life of citizens;
- meeting agendas and minutes therefrom in cases of collective bodies;
- anonymised requests for free access to information, together with responses disclosed by the body or the organisation, in order to allow their use by other persons and entities in addition to those that have requested them.

The standards that will be developed should be translated into a manual (developed by the GRNM, in cooperation with civil society organisations and the expert public), whereby bodies and organisations will better understand their obligations under Article 10, paragraph 1 of the Law on Free Access to Public Information. In developing these standards, due consideration should be made to establish obligations for regular updates to the relevant data, but also for format unification in which they are published (to avoid differences that currently exist). Furthermore, websites should be unified in terms of their layout, as much as possible, and according to developed standards, which will improve user experience. These standards should also address the issue of languages in which the websites are available, i.e. regular updating of data for different language versions.

- Connecting data on public procurements uploaded on the websites of ministries and other bodies and organisations covered under this strategy, with those hosted in the Electronic Public Procurement System to ensure that they match.
- Upgrade the accountability tool on work expenses of public office holders by adding public officials that manage bodies within ministries, independent state administration bodies, administrative organisations and independent state bodies held accountable to the government:
 - In the event of failing to submit data that should be uploaded in the accountability tool on work expenses of public office holders, relevant persons can be held accountable for violation of the obligation under Article 11,



paragraph 3 of the Code of Conduct for Members of Government and Public Office Holders Appointed by Government, whereby the Minister without Portfolio in charge of Communications, Accountability and Transparency will be responsible to monitor their compliance.

- Upgrade and development of the open data portal of the GRNM, i.e. increasing the number of datasets that will be made publicly available.
- Organisation of a public campaign to promote unified websites of the GRNM and other bodies and organisations covered under the Transparency Strategy of the GRNM (2019-2021).
- Promotion of the right to free access to information and active transparency of the GRNM, by developing a media campaign, brochures and other promotional material by the GRNM, in cooperation with the Agency, civil society organisations, foundations and the media. An especially important activity under the public campaign will include the accountability tool on work expenses of public office holders, which is the first such effort by the GRNM. The right to free access to information and active transparency will be promoted among bodies and organisations covered under this strategy, i.e. public office holders and authorised officers, by development of protocols and brochures for them.
- Establishment of an organisation unit on strategic development and transparency at the General Secretariat of the GRNM,⁵¹ which will be tasked with the collection and analysis of data related to the implementation of this strategic document, i.e. active transparency in general. This organisation unit will have a three-fold role: (*) first, it will collect data from other organisation units within the GRNM, i.e. will monitor the publication of data on its website in order to provide instructions in cases when shortcomings are detected; (*) promotion of transparency, i.e. promotion of citizens' right to be informed about operation of the GRNM and other bodies held responsible before the government; (*) regular monitoring of all ministries, bodies within ministries, independent state administration bodies, administrative organisations, public enterprises founded by the GRNM and state-owned joint stock companies in terms of active transparency, i.e. their compliance with obligations defined at the GRNM's 34th session and stipulated under Article 10, paragraph 1 of the Law on Free Access to Public Information. This organisation unit will closely cooperate with the Minister without Portfolio in charge of Communications, Accountability and Transparency. Namely, in order to establish the implementation track-record of the Transparency Strategy of the GRNM (2019-2021), it will present the minister with quarterly reports. In addition, the organisation unit on strategic development and transparency will also provide individual reports to the minister in cases when bodies or organisations have failed to act in compliance with obligations defined at the GRNM's 34th session

⁵¹ The organogram is available at: https://vlada.mk/sites/default/files/dokumenti/organogram_na_generalniot_sekretariat.pdf [retrieved on 8.9.2019].

and under Article 10, paragraph 1 of the Law on Free Access to Public Information. After having received these reports, the Minister without Portfolio in charge of Communications, Accountability and Transparency will take measures pursuant to Article 13 of the Code of Conduct for Members of Government. This organisation unit and the Minister in charge of Communications, Accountability and Transparency should also establish the practice of regular communication with public enterprises founded by the GRNM and state-owned joint stock companies, provide them with necessary instructions as to how they should act in compliance with this strategic document, i.e. to collect data whether and to what extent they have complied with the obligations.

The Action Plan, which is an integral part of the Transparency Strategy of the GRNM (2019-2021), anticipates specific measures and activities for all strategic commitments listed here, as well as indicators to monitor their achievement..



5. DRAFTING SECONDARY LEGISLATION

5.1. Situation analysis

The strategic commitments under this strategic planning document referred to the publication of data on the start of drafting regulations and other secondary legislation (bylaws) falling under the competences of the GRNM, ministries, bodies within ministries, and all other bodies and organisations covered under this document.

At the time when this document is developed, there is no single national register of bylaws, i.e. the Single National Electronic Register of Regulations of the Republic of North Macedonia (ENER) hosts only proposed laws.

5.1.1. Challenges

The most prominent challenge in this regard is **upgrading ENER with proposed secondary legislation** in an identical manner to which proposed laws are published. In that, bodies and organisations covered under the Transparency Strategy of the GRNM (2019-2021) will publish proposed bylaws both on their websites and on ENER.

5.1.2. Strategic commitments

To address this challenge, the following strategic commitment is proposed:

- Publication of proposed bylaws not only on websites of relevant bodies or organisations that adopt them, but also on ENER.

After the relevant bylaws are approved, in compliance with the previously detailed strategic commitments, they will be published on the websites of bodies and organisations that adopt them and whose operation is regulated by these bylaws.

6. ALIGNMENT WITH THE EUROPEAN UNION DIRECTIVE ON REUSE OF PUBLIC SECTOR INFORMATION

6.1. Situation analysis

EU acquis includes several secondary sources of law that cover different aspects of the freedom of information. By adopting the Law on Free Access to Public Information in 2019, the Republic of North Macedonia has aligned, to a great extent, the national legislation with standards defined by the European Union. Here we should note Regulation no.1049/2001 and Directive 2003/4/EC. Nevertheless, EU acquis also includes the Directive 2003/98/EC on reuse of public sector information. This directive focuses on the reuse of all documents made available by public sector bodies, except in cases when they are protected by copyrights. In practice, it means that most data should be offered free of charge or at a minimum charge, provided those charges are justified; publication of mandatory data should be made in the most frequently used, machine-readable format, in order to allow effective reuse of data; regulatory supervision should be provided for compliance with the principles; scope of the directive should be expanded in order to cover, for the first time, libraries, museums and archives.⁵²

6.1.1. Challenges

The challenge identified in terms of the Directive 2003/98/EC is harmonisation of the national legislation of the Republic of North Macedonia with provisions therefrom. In that, the GRNM recognises that the Law on Use of Public Sector Data (“Official Gazette of the Republic of Macedonia” no. 27/2014) was adopted for that purpose, but its implementation track-record is very poor and there is no adequate analyses that would establish the extent to which EU acquis is transposed in the provisions under this law. Therefore, the second strategic measure under the Open Data Strategy (2018-2020) anticipates analysis of this law and development of recommendations for possible amendments thereto. The GRNM also recognises this strategic measure under this strategic document.

⁵² Bozhovikj S., Danilovska D. (2018). Preliminary Report on Implementation of the Law on Free Access to Public Information, Metamorphosis Foundation; pg.9, available at: <http://metamorphosis.org.mk/wp-content/uploads/2018/04/1.5-Preliminaren-izveshtaj-sloboden-pristap.pdf> [retrieved on 9.9.2019].



6.1.2. Strategic commitment

In accordance with the above, the GRNM reiterated the strategic commitment from the Open Data Strategy (2018-2020):

- Conduct analysis of the existing Law on Use of Public Sector Data and secondary legislation adopted pursuant to this law, and when needed, propose amendments to the legislation in order to harmonize it with the EU Directive 2003/98/EC on reuse of public sector information.

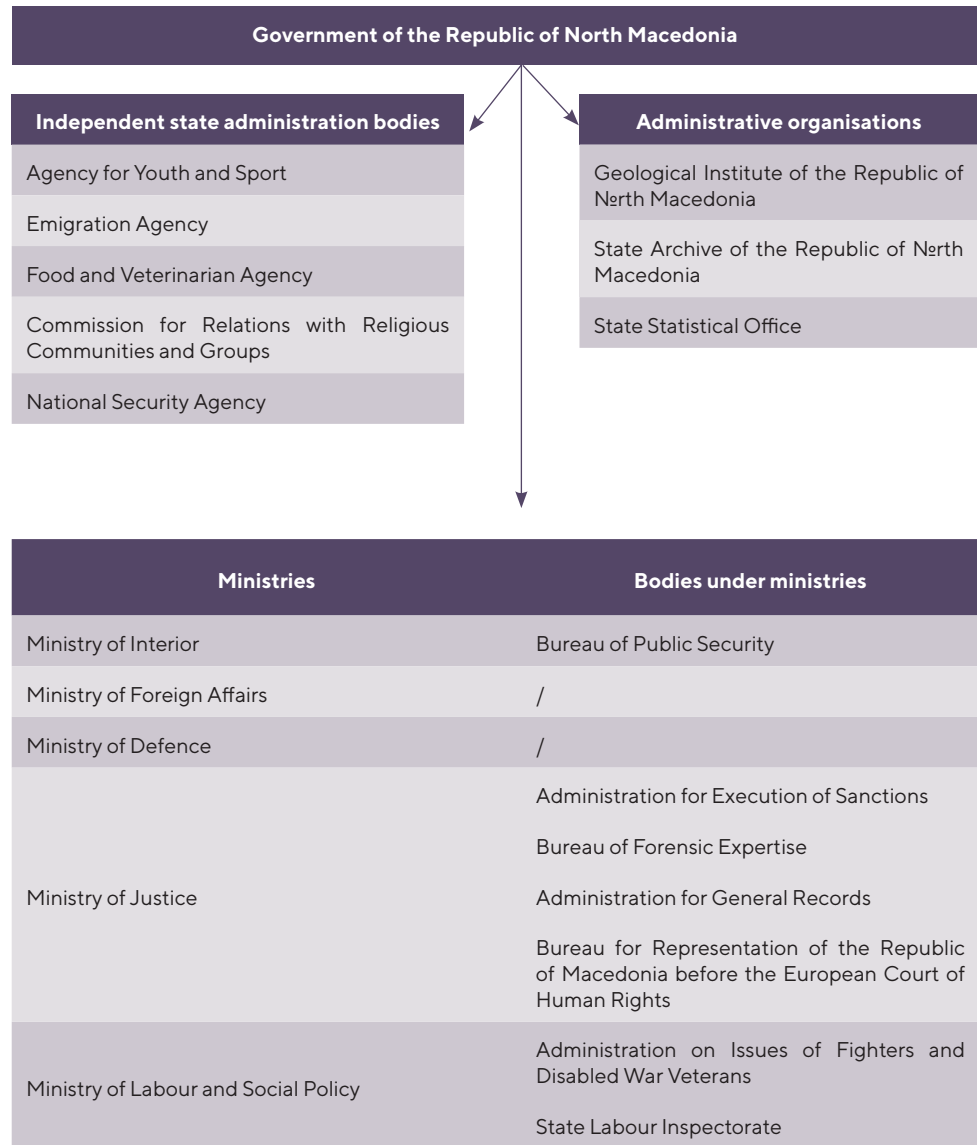
Section 3:

Appendices to the
Transparency Strategy of the
Government of the Republic
of North Macedonia
(2019-2021)

Appendix no.1:

Overview of some bodies
covered under the
Transparency Strategy of the
GRNM (2019-2021)

Overview: Part of bodies and organisations covered under the Transparency Strategy of the GRNM (2019-2021)



Ministries	Bodies under ministries
Ministry of Education and Science	Pedagogical Service
	Bureau for Development of Education
	State Education Inspectorate
Ministry of Information Society and Administration	State Administration Inspectorate
Ministry of Agriculture, Forestry and Water Economy	Administration for Water Economy
	Phytosanitary Administration
	State Phytosanitary Laboratory
	Administration for Seeds and Planting Propagating Materials
	State Agriculture Inspectorate
Ministry of Finance	State Inspectorate for Forestry and Hunting
	Customs Administration
	Public Revenue Office
	Financial Police Administration
	Financial Intelligence Office
	Bureau of Public Procurements
	Administration on Property and Legal Affairs
Ministry of Local Self-Government	State Foreign Exchange Inspectorate
	State Inspectorate for Local Self-Government
Ministry of Culture	Bureau for Regional Development
	Administration for the Protection of Cultural Heritage

Ministries	Bodies under ministries
Ministry of Transport and Communications	Port Authority
	State Transport Inspectorate
	State Inspectorate for Construction and Urban Planning
	State Communal Inspectorate
Ministry of Health	Administration on Railway System Safety
	State Sanitary and Health Inspectorate Administration for Electronic Healthcare
Ministry of Economy	Bureau of Metrology
	State Technical Inspectorate
	State Market Inspectorate Imprest Production Office
Ministry of Environment and Spatial Planning	State Environment Inspectorate
	Environment Administration
Ministry of Political System and Inter-Community Relations	Administration for Affirmation and Advancement of Cultures of Ethnic Communities in the Republic of North Macedonia
	Administration for Development and Advancement of Education in Languages Spoken by Ethnic Communities



Government of the Republic of North Macedonia**Public enterprises founded by the Government of the Republic of North Macedonia and state-owned joint stock companies**

JSC Power Plants of North Macedonia

JSC Macedonian Post

Macedonian Railways Transport JSC – Skopje

JSC MEPSO – Skopje

JSC State Lottery

JSC Water Economy of the Republic of North Macedonia

JSC Construction and Management of Residential and Commercial Property of Significance to the Republic

PE State Forest Management – Macedonian Forests

PE State Roads

PE Macedonia Road

PE Railway Infrastructure – Macedonian Railways

PE Macedonian Broadcasting

PE Strezhevo – Bitola

Appendix no.2:
Action Plan to the
Transparency Strategy
of the GRNM
(2019-2021)

Individual indications to all authorised officers at bodies held accountable to the GRNM about mandatory compliance with the conclusion taken at 120th regular session, according to which decisions on access to information will be taken and signed by authorized officers at relevant bodies.

2. Building awareness at the GRNM and among elected and appointed public officials about the importance of the principle of delegated authority in procedures on access to information as a basic measure to eliminate political influence and in ensuring transparency.

1.1. Developing a template decision on delegation of decision-making authority in procedures on access to information.
1.2. Delegating authority from public officials to authorised officers tasked to facilitate access to information so they will independently take decisions in procedures on access to information.

2.1. Developing manuals and other informative materials on adherent implementation of the principle of delegated authority and compliance with decision-making deadlines.

1.1 - 1.2. Minister in charge of Communications, Accountability and Transparency, General Secretariat of the GRNM and AFAI

2.1. AFAI

1.1. January 2020
1.2. February 2020

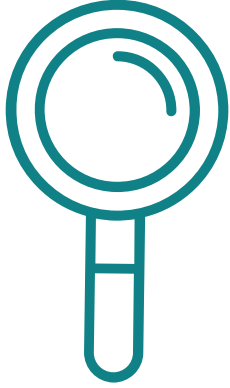
2.1. February 2020

- Template decision on delegation of decision-making authority in procedures on access to information is submitted to all government bodies and all organisations covered under this strategy.

- Manuals and other informative material are submitted to all government bodies and all organisations covered under this strategy.

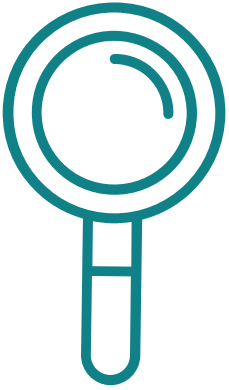
- AFAI offers and provides advice in the process for promotion of the government bodies' practice for implementation of the principle of delegated authority according to LGAP.

Promote the government bodies' practice for implementation of the principle of delegated authority according to LGAP in procedures on access to information.



<p>Access to information</p>		<p>1. Regular information to the GRNM by AFAl on implementation of LFAP: (*) annual statistical data; (*) number of appealed decisions (*) number of approved appeals; (*) execution of AFAl decisions; (*) interim reports on major unlawful practices detected with individual bodies.</p> <p>2. Appointment of authorised officers at AFAl tasked with continuous communication, analysis and exchange of information and data on state-of-affairs with authorised officer from the new organisation unit at the General Secretariat of the GRNM.</p> <p>3. Analysis and implementation of recommendations from the Parliament of RNM upon adoption of AFAl's annual report.</p>	<p>1.1. Adopting systematisation act for the General Secretariat of the GRNM which anticipates job positions in the new organisation unit tasked with analysis of all data and information obtained from AFAl.</p> <p>1.2. Recruiting (public call, internal call or mobility) administrative officer tasked with analysis of all data and information obtained from AFAl.</p>	<p>1.1. General Secretariat of the GRNM, MISA and MoF</p> <p>1.2. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency</p>	<p>11. December 2019 12. January 2020</p>	<p>- Memorandum of Cooperation is signed between the GRNM and AFAl.</p> <p>- Systematisation act for the General Secretariat of the GRNM which anticipates job position in the new organisation unit tasked with analysis of all data obtained from AFAl is adopted and this job position is recruited.</p> <p>- Data on implementation of recommendations from Parliament of RNM related to adopted AFAl's annual operation report is published on the GRNM's website and other channels.</p> <p>- Data is published on measures taken by the GRNM against government bodies upon indications by AFAl that they have not complied with the legal framework.</p>
		<p>1.1. Adopting systematisation act for the General Secretariat of the GRNM which anticipates job positions in the new organisation unit tasked with analysis of all data and information obtained from AFAl.</p> <p>1.2. Recruiting (public call, internal call or mobility) administrative officer tasked with analysis of all data and information obtained from AFAl.</p>	<p>1.1. General Secretariat of the GRNM, MISA and MoF</p> <p>1.2. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency</p>	<p>1.1. General Secretariat of the GRNM, MISA, and MoF</p> <p>2.1. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency</p> <p>2.2. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency</p> <p>3.1. Minister in charge of Communications, Accountability and Transparency</p>	<p>11. December 2019 12. January 2020</p> <p>2.1. December 2019.</p> <p>2.2. January 2020</p> <p>3.1. One month after adoption of AFAl's operation report by Parliament of RNM</p>	<p>- Memorandum of Cooperation is signed between the GRNM and AFAl.</p> <p>- Systematisation act for the General Secretariat of the GRNM which anticipates job position in the new organisation unit tasked with analysis of all data obtained from AFAl is adopted and this job position is recruited.</p> <p>- Data on implementation of recommendations from Parliament of RNM related to adopted AFAl's annual operation report is published on the GRNM's website and other channels.</p> <p>- Data is published on measures taken by the GRNM against government bodies upon indications by AFAl that they have not complied with the legal framework.</p>

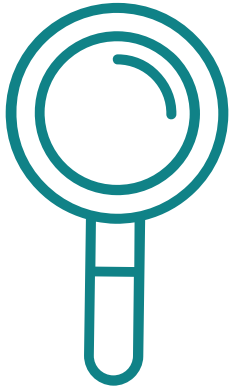
<p>Active transparency</p>	<p>Regular updates of the minimum information and documents covered by the obligation for mandatory publication on websites of all bodies but keeping old documents and information.</p>	<p>1. Development of the list with minimum information and documents covered by the obligation for mandatory publication on websites of all bodies.</p>	<p>1.1. Developing the list of documents and information. 1.2. Submitting the list to all bodies.</p>	<p>1.1. Minister in charge of Communications, Accountability and Transparency 1.2. Minister in charge of Communications, Accountability and Transparency</p>	<p>1.1. January 2020 1.2. January 2020</p>	<p>- The list/catalogue of documents that must be made publicly available is developed and published. - The list/catalogue of documents is submitted to all bodies and organisations covered under this strategy. - Data is published on the GRNM's website about the number of bodies that have complied with the obligation for publication of relevant documents on their websites. - The newly-formed organisation unit on strategic development and transparency regularly monitors compliance of government bodies with the obligation to publish data and documents.</p>
<p>Active transparency</p>	<p>Connecting data on public procurements published on the websites of ministries and other bodies and organisations covered under this strategy to those hosted in the Electronic Public Procurement System.</p>	<p>1. Hyperlinks for data published by bodies and organisations covered under this strategy to those hosted in the Electronic Public Procurement System.</p>	<p>1.1. Linking government bodies' existing databases and portals with the Electronic Public Procurement System so that published data are identical.</p>	<p>1.1. IT department at the Cabinet of PGRNM</p>	<p>1.1. September 2020</p>	<p>- Data on public procurements published on the websites of government bodies correspond to those hosted in the Electronic Public Procurement System. - The newly-formed organisation unit on strategic development and transparency conducts regular monitoring to identify possible deviations.</p>



Active transparency

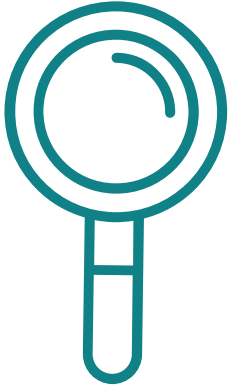
<p>Upgrade the accountability tool on work expenses of public office holders.</p>	<p>1. The GRNM's conclusion to expand the accountability tool on work expenses of public office holders.</p>	<p>1.1. Developing the expanded list of public office holders. 1.2. Developing the methodology on monitoring implementation of the GRNM's conclusion. 1.3. Adopting systematization act for the General Secretariat of GRNM which anticipates job position in the new organisation unit tasked with monitoring implementation of the conclusion under measure no.1. 1.4. Recruiting (public call, internal call or mobility) administrative officer tasked to perform activity 1.3.</p>	<p>1.1. Minister in charge of Communications, Accountability and Transparency. 1.2. Minister in charge of Communications, Accountability and Transparency 1.3. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency 1.4. General Secretariat of the GRNM, Minister in charge of Communications, Accountability and Transparency</p>	<p>1.1. June 2020 1.2. June 2020 1.3. December 2019 1.4. January 2020</p>	<p>- The expanded list of public office holders is developed. - The methodology on monitoring the conclusion's implementation is developed. - The new systematization act for the General Secretariat is adopted and anticipates job position tasked with monitoring implementation of the conclusion to expand the accountability tool on work expenses by public office holders. - Regular information is reported to the Minister in charge of Communications, Accountability and Transparency about non-submission of relevant information by public office holders and actions are taken pursuant to the Code of Conduct for Government Members and Public Office Holders Appointed by the Government.</p>
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Active transparency	Organize public campaign for promotion of unified websites.	1. Dissemination of information to the public about the contents and the method for use of websites, through the media, public debates and social networks, and promotion at higher education institutions, etc. 2. Training for authorised officers at the bodies tasked with website maintenance.	1.1. Determining contents of information under measure no.1. 2.1. Developing training materials. 2.2. Determining number of trainees, number and schedule of training hours. 2.3. Determining trainers. 2.4. Delivering training sessions.	1.1. Minister in charge of Communications, Accountability and Transparency 2.1. - 2.4. Minister in charge of Communications, Accountability and Transparency and new organisation unit	1.1. January 2020 2.1. March-September 2020 2.2. March-September 2020 2.3. March-September 2020 2.4. March-September 2020	- The contents intended to inform the public about the right to be informed about the government's operation is designed in user-friendly and accessible manner (videos, brochures, etc.). - FAQ rubric is enabled on the GRNM's website. - Feedback from bodies to FAQ rubric is made available. - The websites of the GRNM and government bodies include rubric dedicated to assessment of their transparency where citizens can post comments and scores. - The program for promotion at higher education institutions and the like is developed. - The training program for authorised officers tasked with website maintenance is developed.



<p>Active transparency</p>	<p>Promotion of the right to free access to information and active transparency.</p>	<p>1. Dissemination of information to the public on the right to be informed about operation and activities of all bodies held responsible before the government, through the media, social networks and public debates, with press releases, comprehensive and user-friendly brochures, etc., and promotion at secondary schools and higher education institutions.</p>	<p>1.1. Determining the contents of information under measure no.1. 1.2. Developing video materials and brochures. 1.3. Developing FAQ responses thereto on the GRNM's websites. 1.4. Organising lectures at secondary schools and universities. 1.5. Developing commentary on the new LFAPI. 1.6. Organising campaign and other promotion activities.</p>	<p>Minister in charge of Communications, Accountability and Transparency, AFAI and non-governmental organisations</p>	<p>1.6. June 2020. 1.6. Continuously.</p>	<ul style="list-style-type: none"> - The contents intended to inform the public about the right to be informed about the government's operation are developed in user-friendly and accessible manner (videos, brochures, etc.) - FAQ rubric is enabled on the GRNM's website. - Feedback from bodies to FAQ rubric is made available. - The websites of the GRNM and government bodies include rubric dedicated to assessment of their transparency where citizens can post comments and scores. - Program on promotion at higher education institutions and the like is developed. - Program on training of authorised officers takes with information mediation is developed. - The commentary on the new LFAPI is posted in electronic format on the GRNM's website.
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<p>Active transparency</p>	<p>Establish organisation unit on strategic development and transparency at the General Secretariat of the GRNM, tasked to collect and analyse data related to implementation of this strategy.</p>	<p>1. Start of work by the new organisation unit.</p>	<p>1.1. Tasking the human resource sector to develop new rulebooks. 1.2. Obtaining approvals from all competent bodies. 1.3. Adopting the rulebook on internal organisation and the rulebook on the systematisation of jobs at the General Secretariat of the GRNM. 1.4. Recruiting employees for the new organisation unit by means of public call/ internal call/mobility.</p>	<p>1.1. General Secretariat of GRNM 1.2. MISA 1.3. General Secretariat of GRNM 1.4. General Secretariat of GRNM and MoF</p>	<p>1.1. November 2019 1.2. December 2019 1.3. December 2019 1.4. January - February 2020</p>	<p>- The newly-formed organisation unit is equipped with employees (recruited on public call/internal call/mobility).</p>
<p>Secondary legislation</p>	<p>Publication of proposed bylaws on ENER.</p>	<p>1. The GRNM's decision to task all bodies held responsible before the government to publish proposed bylaws. 2. System modifications to the Single National Register of Regulations to accommodate publication of proposed bylaws.</p>	<p>1.1. Drafting the decision under measure no.1 with specific instructions and deadlines for the bodies. 1.2. Adopting the decision under activity no.1.1. 2.1. Designing the software solution. 2.2. Uploading proposed bylaws by the bodies.</p>	<p>1.1. MISA 1.2. GRNM 2.1. IT department (GRNM, MISA). 2.2. All bodies</p>	<p>1.1. January 2020 1.2. February 2020 2.1. February - June 2020 2.2. June 2020 - continuously</p>	<p>- ENER's rubric "regulations" allows users to browse the system according to laws or bylaws. - The newly-formed organisation unit on strategic planning and transparency regularly monitors whether and to which extent bylaws are published by the bodies and, in cases of non-compliance, initiates procedure according to the Code of Conduct before the Minister in charge for Communications, Accountability and Transparency.</p>



<p>A l i g n m e n t with EU acquis</p>	<p>Analysis of the existing Law on Use of Public Sector Data and relevant secondary legislation and proposal of (possible) amendments aimed to ensure alignment with the EU Directive on reuse of public sector information.</p>	<p>1. Develop analysis of the existing Law on Use of Public Sector Data and relevant secondary legislation aimed to align them with the EU Directive on reuse of public sector information.</p> <p>2. Amendments to the Law on Use of Public Sector Data.</p>	<p>1.1. Establishing the working group at MISA.</p> <p>1.2. Presenting analysis results and findings to the GRNM.</p> <p>2.1. Establishing the working group at MISA.</p> <p>2.2. Developing draft amendments and submitting them to the GRNM.</p> <p>2.3. Publishing draft amendments on ENER.</p> <p>2.4. Procedure at the GRNM for adoption of proposed amendments.</p> <p>2.5. Adopting amendments in the Parliament.</p>	<p>The GRNM, MISA, SEA, non-governmental sector</p>	<p>1.1. January 2020 1.2. February 2020</p> <p>2.1. February 2020 2.2. February - March 2020</p> <p>2.3. March 2020 2.4. April 2020 2.5. April - May 2020.</p>	<p>- The working group is established at the Ministry of Information Society and Administration.</p> <p>- Analysis results and findings on the Law on Use of Public Sector Data are presented to the GRNM.</p> <p>- Procedure at the GRNM for adoption of draft amendments is established, clear and approved by all stakeholders.</p> <p>- Amendments are approved by the Parliament.</p>
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Monitoring strategy implementation	<p>1. Monitoring implementation of all measures and activities defined under the strategy.</p> <p>2. Reporting to the GRNM.</p>	<p>1.1. Establishing the working group on monitoring strategy implementation.</p> <p>1.2. Regular verification of indicators for measures and activities under the Action Plan by the organisation unit and submission of quarterly reports to the Minister in charge of Communications, Accountability and Transparency.</p> <p>1.2. Making indications, instructions and issuing responsibility measures in relation to strategy implementation.</p> <p>2.1. Submitting semi-annual reports to the GRNM by the Minister in charge of Communications, Accountability and Transparency.</p>	<p>1.1. Minister in charge of Communications, Accountability and Transparency</p> <p>1.2. Minister in charge of Communications, Accountability and Transparency</p> <p>1.2. Minister in charge of Communications, Accountability and Transparency</p>	<p>1.1-1.2. continuously</p> <p>2.1. continuously</p>	<p>- Decision is taken by the Minister in charge of Communications, Accountability and Transparency to form working group tasked with monitoring strategy implementation.</p> <p>- The program on regular meetings is adopted by the working group for monitoring strategy implementation.</p> <p>- Proposals from the working group on monitoring strategy implementation are published on the website of the GRNM.</p> <p>- Data on indications, instructions and responsibility measures issued by the Minister in charge of Communications, Accountability and Transparency pursuant to the Code of Conduct are published on the GRNM's website.</p>
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Index of abbreviations used in the Action Plan:

- AFAI – Agency for Protection of the Right to Free Access to Public Information;
- GRNM – Government of the Republic of North Macedonia;
- MISA – Ministry of Information Society and Administration;
- MoF – Ministry of Finance;
- IT – Information Technologies;
- PGRNM – President of the Government of the Republic of Macedonia;
- GS of GRNM – General Secretariat of the Government of the Republic of North Macedonia;
- SEA – Secretariat for European Affairs.



