Independent Reporting Mechanism (IRM): Croatia Transitional Results Report 2018–2020

This report was prepared in collaboration with Ivona Mendeš Levak, independent researcher.

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I. Introduction

The Open Government Partnership is a global partnership that brings together government reformers and civil society leaders to create action plans that make governments more inclusive, responsive, and accountable. Action plan commitments may build on existing efforts, identify new steps to complete ongoing reforms, or initiate an entirely new area. OGP's Independent Reporting Mechanism (IRM) monitors all action plans to ensure governments follow through on commitments. Civil society and government leaders use the evaluations to reflect on their progress and determine if efforts have impacted people's lives.

The IRM has partnered with Ivona Mendeš Levak, an independent researcher, to carry out this evaluation. The IRM aims to inform ongoing dialogue around the development and implementation of future commitments. For a full description of the IRM's methodology, please visit https://www.opengovpartnership.org/about/independent-reporting-mechanism.

This report covers the implementation of Croatia's third action plan for 2018–2020. In 2021, the IRM will implement a new approach to its research process and the scope of its reporting on action plans, approved by the IRM Refresh.[1] The IRM adjusted its implementation reports for 2018–2020 action plans to fit the transition process to the new IRM products and enable the IRM to adjust its workflow in light of the COVID-19 pandemic's effects on OGP country processes.

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[1] For more information, see: https://www.opengovpartnership.org/process/accountability/about-the-irm/irm-refresh/.

II. Action Plan Implementation

The IRM Transitional Results Report assesses the status of the action plan's commitments and the results from their implementation at the end of the action plan cycle. This report does not revisit the assessments for "Verifiability," "Relevance," or "Potential Impact." The IRM assesses those three indicators in IRM Design Reports. For more details on each indicator, please see Annex I in this report.

2.1. General Highlights and Results

This action plan focused on opening data, advancing the right to access information, fiscal transparency, and citizen participation in decision-making processes. Croatia fully completed 3 of 15 commitments in this plan, substantially completed 7, and achieved limited completion of 5 commitments. The overall progress in commitment implementation is comparable to Croatia's performance in the implementation of the previous action plan.[2]

Many commitments, including the four noteworthy commitments (Commitment 2 on fiscal transparency, Commitment 3 on political financing and election campaign transparency, Commitment 6 on protection of persons reporting corruption, and Commitment 11 on Central State Portal development) were aligned with other strategic or legal documents which contributed toward their full or substantial completion. In fact, the noteworthy commitments built on commitments and milestones from the previous 2014–2016[3] action plan, and all but Commitment 11 are in line with the public finance, political integrity, and judiciary measures outlined in the Anti-Corruption Strategy 2015–2020.[4] Commitment 2 on fiscal transparency also includes activities as mandated in the Budget Act along with the calendar of implementation .[5] A 2017–2018 anti-corruption strategy action plan included strengthening election campaign transparency (Commitment 3) and regulating the financing of referendum campaigns as well as whistleblower protection activities (Commitment 6).[6]

Factors limiting implementation range from a lack of political interest (e.g., Commitment 13 on funding anti-corruption activities of CSOs),[7] financial constraints (e.g., a youth open data hackathon planned as part of Commitment 10),[8] delays in EU-funded projects and subsequent procurement procedures (e.g., Commitment 5 on creating a new IT system of CSO programs and projects funded by public authorities),[9] as well as delays caused by the COVID-19 pandemic.[10]

Some commitments in this action plan introduce new legislation that are not required to be fully implemented before the end of the action plan cycle, limiting the assessment of implementation of these new norms (such as Commitment 6 on the Act on Protection of Persons Reporting Corruption and its bylaws). However, other commitments demonstrated immediate benefits for citizens, such as Commitment 3. This commitment increased transparency in political financing and election campaigns, which improved the legal and institutional framework, and created an IT system for public monitoring of political activity and campaign funding in three election cycles (EU, presidential, parliamentary and local elections). This improved the quality of campaign funding data submitted by candidates and political parties, and allowed the interested public (especially the media) to access to such information.[11]

2.2. COVID 19 Pandemic Impact on Implementation

The COVID-19 pandemic somewhat disrupted implementation of Croatia's national action plan (between March and August 2020). Some of the planned activities were not implemented to the extent envisaged due to lockdown-related restrictions on gatherings and free movement (affecting education, trainings, and other public events), although according to the draft self-assessment report, some of these will be implemented in the next action plan. It also merits mentioning that at

the start of the COVID-19 pandemic, after lockdown began, the capital city of Zagreb was hit by a 5.5 earthquake on the Richter scale, devastating buildings and halting regular activities in the city center, which is where many state administrative bodies operate. (For example, the offices of the Information Commissioner were hard hit and are unusable for normal functioning.)[12]

On the other hand, open government systems developed via the OGP process were used to respond to the COVID-19 pandemic. The e-Citizen system enabled e-Passes, which sped up the process of issuing passes to citizens abandoning permanent residences during the lockdown. The Croatian Institute of Public Health and the Ministry of Health collected and submitted open (machine-readable), accurate, verified, and transparent coronavirus data on the official government website[13] and the Open Data Portal. During the first lockdown in 2020, the public trusted the daily information on the number of new infections and deaths.[14] This trust declined; according to research conducted in November 2020, 33% of respondents stated they had little-to-no trust in the national Civilian Protection Headquarters (charged with COVID-19 decision-making), while almost 66% either trust it fully or with some reservations.[15]

A joint initiative of the Ministry of the Interior and the Zagreb Child and Youth Protection Center launched the campaign, "Behind the doors," to encourage reporting of domestic violence cases that were on the rise during the pandemic.[16] Also, technology companies and epidemiologists developed a "virtual doctor"[17] to advise Croatians on how to diagnose and manage suspected COVID-19 infections with personalized health advice and guidance. According to the government, it could process thousands of requests daily, while doctors can only handle about 50 calls a day.[18]

[2] In the previous action plan (2014–2016), 5 of 16 commitments were fully completed, 6 of 16 were substantially completed, and 5 of 16 had limited completion.

[3] Government of the Republic of Croatia, *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the Period 2014 to 2016* (OGP, Jul. 2014), https://www.opengovpartnership.org/sites/default/files/Action%20Plan-OGP-8-7-2014-final-ENG.pdf.

[4] Croatian Parliament, "Anti-Corruption Strategy 2015–2020" (*Official Gazette*, 9 Mar. 2015), https://narodne-novine.nn.hr/clanci/sluzbeni/2015_03_26_545.html.

[5] Croatian Parliament, Budget Act 87/08, 136/12, 15/15 (Zakon HR Procisceni Tekstovi Zakona, 14 Feb. 2015), https://www.zakon.hr/z/283/Zakon-o-prora%C4%8Dunu.

[6] Ministry of Justice, *Action Plan for 2017 and 2018 accompanying the Anti-Corruption Strategy from 2015-2020* (Jun. 2017), https://mpu.gov.hr/UserDocsImages/dokumenti/Pravo%20na%20pristup%20informacijama/Akcijski%20plan%20suzbijanja%20korupcije%202017_2018.pdf. Number 5. *See* Measure 63 specifically for the whistleblowing commitments that were incomplete and therefore rolled over into the OGP action plan.

[7] Jelena Tešija (GONG), interview by IRM researcher, 21 Feb. 2019; Jelena Berković and Melisa Skender (GONG), online interview by IRM researcher, 11 Nov. 2019.

[8] Zoran Pičuljan (Information Commissioner) and Ina Volmut and Lucija Jadrijević (Ofc. of the Information Commissioner), interview by IRM researcher, 21 Feb. 2019; Volmut and Jadrijević (Information Commissioner's Ofc.), email interview, 13 Nov. 2020.

[9] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020* (OGP, 19 Mar. 2021), https://www.opengovpartnership.org/documents/croatia-end-of-term-self-assessment-2018-2020/; Darija Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview by IRM researcher, 9 Nov. 2020.

[10] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

[11] Berković and Skender (GONG), interview.

[12] The earthquake occurred on 22 March 2020. Volmut and Jadrijević (Information Commissioner's Ofc.), email interview.

[13] Available at: https://koronavirus.hr/.

[14] *See* https://www.facebook.com/direktno.hr/posts/2673221309602349/.

[15] The survey was conducted 2–6 November by the Promocija plus agency on 1,300 respondents, for the *RTL* TV station. Slobodna Dalmacija, "The survey reveals how much citizens trust the Headquarters and what measures they would introduce: almost 80 percent of respondents oppose lockdown" (7 Nov. 2020), https://slobodnadalmacija.hr/vijesti/hrvatska/istrazivanje-otkriva-koliko-gradani-vjeruju-sozeru-i-koje-mjere-bi-oni-uveli-kada-bi-se-njih-pitalo-cak-80-posto-ispitanika-protivi-se-lockdownu-1056143; SibHR, "EXCLUSIVE Large RTL survey: How many citizens support lockdown, and what would they leave open? We also reveal which member of the Staff they trust the most!" (7 Nov. 2020), https://sib.net.hr/video/416044/ekskluzivno-veliko-istrazivanje-rtl-a-koliko-gradjana-podrzava-lockdown-a-sto-bi-ostavili-otvoreno-otkrivamo-i-kojem-clanu-stozera-najvise-vjeruju/.

[16] Zagreb Child and Youth Protection Center, "Kampanja 'Iza Vrata': Prepoznaj Miju u svom ulazu i nazovi 192" (10 Apr. 2020), https://www.youtube.com/watch?v=hYPX8QwwzB8.

[17] Available at: https://andrija.ai/.

[18] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

2.3. Early results

The IRM acknowledges that results may not be visible within the two-year time frame of the action plan and that at least a substantial level of completion is required to assess early results. For the purpose of the Transitional Results Report, the IRM will use the *"Did it Open Government?"* (DIOG) indicator to highlight early results based on the changes to government practice in areas relevant to OGP values. Moving forward, new IRM Results Report will not continue using DIOG as an indicator.

Section 2.3 focuses on outcomes from the implementation of commitments that had an ambitious or strong design, per the IRM Design Report assessment, or that may have lacked clarity and/or ambition but had successful implementation with "major" or "outstanding" changes to government practice. Commitments considered for analysis in this section had at least a "substantial" level of implementation, as assessed by the IRM in Section 2.4. While this section provides the analysis of the IRM's findings for the commitments that meet the criteria described above, Section 2.4 includes an overview of the level of completion for all the commitments in the action plan.

Commitment 2: Fiscal Transparency	
Aim of the commitment	This commitment aimed to ensure timely and accurate information on state, regional, and local budgets at various stages of the budgetary process in a machine-readable, searchable, open, and reusable form. The commitment would increase transparency and access to information by improving the existing database on payments from the state budget account, including more data in machine-readable format, providing better search options, and creating an application to search and visualize available data to help citizens navigate published documents.[19]
Did it open government? Major	The Ministry of Finance (MoF) stated that it fully implemented seven of nine activities,[20] including the two most impactful ones: publishing balance sheets of local and regional units, including a 5-year archive; and creating visuals of state budget data. Institute of Public Finance representatives[21] stated that despite minor shortcomings in implementation (e.g., delays in data publishing and not publishing all data in machine-readable formats),[22] the visualization of budget data in machine-readable format is available on the MoF's website.[23]
	The MoF published balance sheets of local and regional units from the past 17 years in machine-readable, and easily searchable formats (standard Excel documents of the financial report form). This exceeded the original plan that requested making data available for the past five years.[24]
	The MoF also reports[25] that it significantly improved the database on payments from the single State Budget account,[26] and began creating a unified, machine-readable database of financial reports by all budgetary and extrabudgetary beneficiaries.[27] According to the self-assessment report, the MoF plans to publish the database of financial reports by all beneficiaries by 2021, and continuously publish all data envisaged by the action plan (see Milestone 2.8. regarding financial reports by all budgetary and extra-budgetary beneficiaries).[28]

	However, Institute of Public Finance representatives stated that the MoF's website transitioned to the gov.hr platform, completely changing its original configuration, which they now find more difficult to navigate.[29] Four of the nine activities were a continuation from the previous action plan, so no particular change in practice was made in that regard. On the other hand, publicly available, open data on local and regional budgets spanning almost two decades, as well as a visual of the state budget, are novelties for Croatia, and signify a major step toward improved transparency in public finances and ensuring citizen and stakeholder access to information.

Commitment 3: Political Financing and Election Campaign Transparency	
Aim of the commitment	The commitment aimed to strengthen transparency of financing regular political activities, elections, and referenda. The commitment sought to address constraints to monitoring the number of political parties and candidates, submission and publishing of financial reports, and inadequate regulations on financing referendum campaigns. The commitment would amend existing legislation and ensure the collection and publishing of data on electoral and referendum financing on the State Electoral Commission webpage. It also aimed to educate local and regional political parties and independent council members, presidential candidates, and Croatian candidates for the European Parliament.
Did it open government? Major	The commitment was fully completed by the Ministry of Administration and the State Electoral Commission.[30] The Political Activities, Election Campaigns and Referenda Financing Act (OG 29/19, 98/19), adopted in March 2019 and amended in October 2019, improved transparency of political financing by introducing an information system for monitoring and publishing financing. Supervised entities submit financial reports and grant reports to relevant authorities, including the cost of election campaigns and referendum activities.[31] The State Electoral Commission website now offers a significantly increased amount of permanently accessible, searchable, machine-readable data on financing for political activities, as well as funding election and referenda campaigns.[32] GONG, a CSO monitoring funding of political activities, confirmed that transparency improved and information is now easily accessible, especially for the media and interested public.[33] Implementation of this commitment has been tested in European, presidential, parliamentary, and local elections during 2019 and 2020, and the Organization for Security and Cooperation in Europe (OSCE) has reported that candidates "largely complied with their obligations," which "brought about improvements to the transparency of reporting on campaign spending."[34] This is also the first

time referenda activity funding was regulated and the related information was published in Croatia.

The new system ensures that personal financing of political activity is included in financial reports 30 days after election day. GONG has criticized loopholes which allow campaigns to evade providing accurate spending details on specific social networks by just giving total amounts for all online spending, making it impossible to determine how much and where spending was targeted.[35]

Introducing regulation and improving transparency in political financing and referenda campaign funding has provided greater public access to information on political spending. This has contributed toward more effective oversight by relevant authorities and better monitoring of political funding by the public. The shortcomings however, mean that the implementation has had a major (rather than outstanding) result on opening government. Lax enforcement of accurate and disaggregated data (particularly spending on social networks) has especially diminished the intended result of this reform. Legislators and enforcing institutions could further the impact of these reforms by requiring better provision of disaggregated and accurate data from candidates and campaigns on online social network spending.

Commitment 6: Protection of Persons Reporting Corruption	
Aim of the commitment	The commitment sought to draft the Act on Protection of Persons Reporting Corruption, as existing protections was reduced to court protection and was regulated through several different legal acts. The commitment would ensure protection of whistleblower anonymity and set up an institutional framework for effective and swift reporting of corruption as well as opportunities to uncover those involved in it. The commitment would increase public accountability, transparency, and integrity by encouraging whistleblowing.
Did it open government? Major	The Croatian Parliament adopted the Act on Protection of Persons Reporting Corruption on 8 February 2019.[36] The Act came into effect on 1 July 2019 and gave public and private entities essentially until January 2020 to be fully in compliance with the law. The positive effects of the Act are the creation of different channels, opportunities, and capabilities of whistleblowing which may increase public accountability. The Act envisages new models of whistleblower protection besides court proceedings, including: internal reporting (requiring the creation of a "confidential person" who can receive reports within the place of employment), external reporting to the Ombudsman's Office, and public disclosure such as through the media (only when other channels are not possible due to imminent danger). It is up to employers to regulate the whistleblowing procedure and to appoint a confidential person by creating internal bylaws.

However, opposition parties in parliamentary discussions and CSOs raised concerns about insufficient funding for the Ombudsman's Office, overly lengthy deadlines for adopting internal regulations in public and private entities, and the lack of free legal aid and psychosocial support to whistleblowers.[37]

A marked rise in Croatians blaming insufficient whistleblower protection for not reporting corruption in a 2019 Eurobarometer survey[38] might indicate increased public awareness of whistleblowing (due to Parliamentary debate on the law) rather than increased obstacles to whistleblowing. While there is no published data on actual cases of whistleblowing since the law came into effect, anecdotal evidence points to institutional success. In one case during the coronavirus pandemic, the Ombudsman intervened to demand protection of a doctor at local hospital in Zagreb who blew the whistle on their superiors regarding the lack of medicine and food for patients.[39]

Overall, the Act has brought major results in open government by adopting and implementing legislation to increase public accountability through public and private whistleblowing mechanisms. Since the law came into force, it has been used to protect whistleblowers in at least one case where public bodies defended the right of the whistleblower to protection. It is too early to establish statistically whether the law has fundamentally changed institutional culture in favor of whistleblowers. Further steps to raise awareness and ensure internal mechanisms are in place would improve protection of whistleblowers in Croatia.

Commitment 11: Central State Portal Development	
Aim of the commitment	This commitment is a continuation from the previous action plan[40] and includes three components: continued development of the Central State Portal (CSP), digital services in the e-Citizens system, and developing the My Administration website. It envisaged a redesign of the CSP as a central site for access to digital services in accordance with analysis of user experience and the new European Commission directive on better access to websites. It would also increase the number of state bodies present on the CSP and the number of digital services available within the e-Citizen system.
Did it open government? Marginal	Most of the commitments were carried out by the Central State Office for Development of Digital Society and the Ministry of Administration, despite the Office of the Prime Minister being the lead institution for this commitment.[41] Substantial development of the Central State Portal (CSP) increased the number and breadth of digital services available through the e-Citizens system such that only one ministry and four state administrative offices have not yet migrated to the CSP due to technical and financial constraints. The e-Citizen system now offers 76 digital services (from 15 in 2018). Also, the same system grew from 661,842 unique users in March 2019, to over 1 million users (36%

increase) in October 2020, which was due to the major impact of the COVID-19 pandemic and subsequent lockdown, according to official sources from the Central State Office.[42] A HrOpen representative remarked that a lack of publicity about new digital services did not lend to increased transparency and was a shortcoming of the CSP/e-Citizen system.[43]

On the other hand, the My Administration website underwent minor advances as it is expected to undergo a major overhaul in the next action plan cycle. To increase responsibility and authority in implementation, work is underway to select a state-level editorial board, as well as internal gov.hr teams in each government body, to oversee the changes.[44]

The scope and impact on the systems in this commitment depend on political will and on financial constraints of individual implementing state bodies. The government changed several its processes by including new technological solutions, increasing accessibility of services to citizens (especially citizens with disabilities, per European and Croatian law on web accessibility),[45] and moving services from physical spaces to an online platform. However, while some are available and many are in the final testing stages,[46] there is still a lack of digital services provided for legal entities, such as e-Business that can link business-to-business functions, and digital fees, electronic/mobile signatures, and electronic/mobile seal functions. Beyond the scope of this action plan cycle, the Central State Office for Development of Digital Society plans to redesign the e-Citizen system into a more intuitive interface and also prepare an e-Citizen mobile application.[47]

Overall, citizen digital interaction with state services has improved significantly, especially in a time when physical contact need to be reduced due to COVID-19. However, it is unclear whether the advances in efficiency and available digital services has had more than a marginal impact on opening up government service provision.

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[19] The Global Initiative for Fiscal Transparency (GIFT) is a global network facilitating dialogue between governments, civil society organizations, international financial institutions, and other stakeholders to find and share solutions for fiscal transparency and participation (http://www.fiscaltransparency.net/). For information on the principles of public participation, fiscal transparency, and accountability, *see*: Branko Stanić, "Globalna inicijativa za fiskalnu transparentnost: Načela sudjelovanja javnosti u fiskalnoj politici" [Global Fiscal Transparency Initiative: Principles of Public Participation in Fiscal Policy] (Newsletter of the Institute for Public Finance, Mar. 2017), http://www.ijf.hr/upload/files/110.pdf; Branko Stanić, "Globalna inicijativa za fiskalnu transparentnost: Načela visoke razine fiskalne transparentnosti, sudjelovanja i odgovornosti" [Global Fiscal Transparency Initiative: Principles of a high level of fiscal transparency, participation and accountability] no. 9 (Newsletter of the Institute for Public Finance, Mar. 2017) http://www.ijf.hr/upload/files/109.pdf.
[20] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020.*
[21] Katarina Ott and Mihaela Bronić (Institute of Public Finance), email interview by IRM researcher, 13 Nov. 2020.
[22] Institute of Public Finance, comments on Croatia's self-assessment implementation report in preparation for the 6th session of the OGP Council., sent to the IRM researcher via email, (Dec. 2020).
[23] OS Viewer, "Croatian Budget and Spending" (Nov. 2020), https://openspending.org/viewer/667df60aa07c34260eae9b55b2778712:croatia-budget-spending?measure=%22executed_value.sum%22&groups%5B%5D=%22activity1_code.activity1_code%22&filters%5BYear.Year%5D%5B%5D=2018&order=%22executed_value.sum%7Cdesc%22&visualizations%5B%5D=%22Treemap%22&lang=hr.

24 The balance sheets of local and regional units are available at: https://mfin.gov.hr/istaknute-teme/lokalna-samouprava/financijski-izvjestaji-jlp-r-s/203.

25 Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

26 Ministry of Finance, "Upit o plaćanjima iz Državnog proračuna po dobavljačima" [Review of the execution of the state budget by suppliers for the budget year] (Nov. 2020) http://www.drzavna-riznica.hr/upit_po_dobavljacima/

27 This 24-month project started at the end of 2019.

28 Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

29 Ott and Bronić (Institute of Public Finance), interview with IRM researcher, 13 Nov. 2020

30 Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

31 Financial reports on funding election campaigns are available on the State Electoral Commission's website at: https://www.izbori.hr/site/nadzor-financiranja/financiranje-izborne-promidzbe/financijski-izvjestaji-o-financiranju-izborne-promidzbe/1992. Financial reports on funding political activities are available at: https://www.izbori.hr/arhiva-izbora/index.html#/app/financiranje. Financial reports on funding referenda are available at: https://www.izbori.hr/site/nadzor-financiranja/financiranje-referendumskih-aktivnosti/financijski-izvjestaji-o-financiranju-referendumskih-aktivnosti/2012.

32 *Id.*

33 Berković and Skender (GONG), online interview with IRM researcher, 11 Nov. 2020.

34 Office for Democratic Institutions and Human Rights (ODIHR), *Republic of Croatia Parliamentary Elections 5 July 2020: ODIHR Election Assessment Mission Final Report* (OSCE, 28 Sept. 2020), https://www.osce.org/files/f/documents/b/4/465120_0.pdf.

35 Berković and Skender (GONG), online interview with IRM researcher, 11 Nov. 2020; GONG, "We do not have real costs for campaigns on social media" (3 Jan. 2020), https://www.gong.hr/en/electoral-system/presidential/we-do-not-have-real-costs-for-campaigns-on-social-/; GONG, "DIP mora reagirati u slučaju Škore i Facebooka" [The SEC must react in the case of Škora and Facebook] (23 Jan. 2020), https://www.gong.hr/hr/izborni-sustav/predsjednicki/dip-mora-reagirati-u-slucaju-skore-i-facebooka/; GONG, "I dalje bez cjelovite slike kampanja na Facebooku" [Still without a complete picture of the campaign on Facebook] (7 Aug. 2020), https://www.gong.hr/hr/izborni-sustav/parlamentarni/i-dalje-bez-cjelovite-slike-kampanja-na-drustvenim/.

36 Croatian Parliament, "Zakon o zaštiti prijavitelja nepravilnosti" [Law on the Protection of Reporters of Irregularities] no.357 (*Official Gazette*, 20 Feb. 2019), https://narodne-novine.nn.hr/clanci/sluzbeni/2019_02_17_357.html. It is also worth mentioning that on 12 March 2019, the European Parliament and Commission agreed to dedicate EU legislation in this area, strengthening the need for respective legislation in member states. Lucinda Pearson, "Press release: Historic day for whistleblowers as EU agrees pathbreaking legislation" (Transparency International, 12 Mar. 2019), https://transparency.eu/press-release-historic-day-whistleblowers/.

37 Hina, "Sabor raspravljao o zakonu zaštiti žviždača, nisu svi oduševljeni njime" [Parliament debated the whistleblower protection law, not everyone was thrilled with it] (index.hr, 10 Oct. 2018), https://www.index.hr/vijesti/clanak/sabor-raspravljao-o-zakonu-o-zastiti-zvizdaca-nisu-svi-odusevljeni-njime/2029601.aspx; V. P. P. and Hina, "Saborska oporba: Zakon o zaštiti zviždača mrtvo slovo na papiru" [Parliamentary Opposition: Whistleblower Protection Act a dead letter on paper] (tportal.hr, 1 Feb. 2019), https://www.tportal.hr/vijesti/clanak/saborska-oporba-zakon-o-zastiti-zvizdaca-je-mrtvo-slovo-na-papiru-foto-20190201; Kuća ljudskih prava, "Reakcija povodom usvajanja Zakona o zaštiti prijavitelja – 'zviždača'" [Reaction to the adoption of the Law on the Protection of Applicants - 'whistleblowers'] (8 Feb. 2019), http://www.kucaljudskihprava.hr/2019/02/08/reakcija-povodom-usvajanja-zakona-o-zastiti-prijavitelja-nepravilnosti-zvizdaca/; *see* comments by CSOs in the e-Consultation process: https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=8250.

38 European Commission, *Commission Staff Working Document: 2020 Rule of Law Report Country Chapter on the rule of law situation in Croatia* (Brussels: 30 Sept. 2020) 12, https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52020SC0310&from=EN.

39 Croatian Ombudsman Office, *Pokrenut ispitni postupak o navodima u anonimnom pismu iz KB Dubrava* [Initiated examination procedure o allegations in an anonymous letter from KB Dubrava] (30 Oct. 2020), https://www.ombudsman.hr/hr/pokrenut-ispitni-postupak-o-navodima-u-anonimnom-pismu-iz-kb-dubrava/.

40 Government of the Republic of Croatia, *Action Plan for Implementation of the Open Government Partnership Initiative in the Republic of Croatia for the Period 2014 to 2016* (OGP, Jul. 2014) Measure 3, Milestone 3.1 on 14−15, and Measure 5, Milestone 5.1 on 20, https://www.opengovpartnership.org/sites/default/files/Action%20Plan-OGP-8-7-2014-final-ENG.pdf.

41 Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview, 9 Nov. 2020; Zoran Luša (Ministry of Judiciary and Administration), telephone interview by IRM researcher, 13 Nov. 2020; Božo Zeba (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020; Ivana Lasan (Central State Ofc. for Development of Digital Society), phone interview, 13 Nov. 2020.

42 Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020;* Luša (Ministry of Judiciary and Administration), telephone interview, 13 Nov. 2020; Zeba (Central State Ofc. for Development of Digital Society), interview; Lasan (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020

43 Miroslav Schlossberg (HrOpen), email interview by IRM researcher, 12 Nov. 2020.

[44] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020;* Luša (Ministry of Judiciary and Administration), telephone interview, 13 Nov. 2020; Zeba (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020; Lasan (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020.

[45] *Id.*

[46] Zeba (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020; Lasan (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020.

[47] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020;* Zeba (Central State Ofc. for Development of Digital Society), interview; Lasan (Central State Ofc. for Development of Digital Society), online interview, 13 Nov. 2020.

2.4. Commitment implementation

The table below includes an assessment of the level of completion for each commitment in the action plan.

Commitment	Completion:
	(no evidence available, not started, limited, substantial or complete)
1. Implementing Right to Information	**Complete[48]** The Information Commissioner's Office published and aired promotional videos,[49] initiated a public campaign for youth,[50] held other awareness-raising activities (e.g., four webinars,[51] two newsletters,[52] and several media appearances), trained over 300 public officials on the proper application of the law at national and regional levels (both live and via webinars),[53] published seven instructions and guidelines,[54] reported on FoIA compliance of over 240 public authorities,[55] and released a new self-assessment questionnaire.[56] The IC's Office plans to tailor training to different target groups (e.g., leading public officials and servants) and to continue the youth campaign as conditions regarding COVID-19 allow.
2. Fiscal Transparency	**Substantial** For details regarding the implementation and early results of this commitment, see Section 2.3.
3. Political Financing and Election Campaign Transparency	**Complete** For details regarding the implementation and early results of this commitment, see Section 2.3.
4. Transparency and Accountability of Commercial Companies with Majority Ownership of Local and Regional Self-Government	**Substantial** The government adopted the Anti-Corruption Program for Commercial Companies with Majority Ownership by Local and Regional Self-Government Authorities on 30 December 2020.[57] The government conducted a short public consultation period, in which they only received two comments (none from CSOs).[58] The Government Office for Cooperation with Non-Governmental Organizations conducted four training programs for almost 50 locally or regionally owned companies and intends to continue these trainings.[59] The implementation period of the program changed to 2021–2022, due to delays in the legislative procedure caused by the COVID-19 pandemic.[60]
5. Transparency in Public Funding of CSO Projects	**Limited** The Government Office for Cooperation with Non-Governmental Organizations is still in the planning phase for the new IT system with the managing authority (Ministry of Labor, Pension System, Family and Social Policy).[61] This is also the reason why the existing public database on CSO programs and publicly funded projects[62] is updated sporadically. The Office fully implemented nine training programs for 186 employees of

	state, regional, and local authorities.[63] The Office plans to continue the activities not implemented in this action plan in the next national OGP cycle, including replacing the database and a new government IT system.[64]
6. Protection of Persons Reporting Corruption	**Complete** For details regarding the implementation and early results of this commitment, see Section 2.3.
7. Parliamentary Transparency	**Substantial** The Croatian Parliament introduced the new webpage [65] in December 2018, offering most of the envisaged features, such as including new data in an open format, simplifying multiple searches, filtering and sorting data, and greater user-friendliness. Parliament services said they held several meetings with relevant representatives in preparation for the new website. Technical preconditions for publishing data via Application Programming Interfaces (API) were provided, although planning, building, and publishing the API have yet to be realized. Other datasets in open formats (CSV, TXT, XLSX) are available to users.[66] However, a few features do not yet meet the Government's Open Data Policy. For example, access to data via API is only offered for archive data from the former webpage[67] and voting information is only offered for plenary sessions (disrupted due to COVID-19 and earthquake damage),[68] both of which have been criticized by GONG.[69] The Parliament's press release[70] listed available APIs and stated that other datasets are awaiting publication.
8. Media Regulatory Framework	**Limited** In 2018, the Ministry of Culture (MoC) started drafting the Electronic Media Act,[71] established a Working Group[72] for drafting it to ensure compliance with the EU's Audiovisual Media Services Directive,[73] and conducted a public consultation.[74] The Act had not been adopted by the end of the action plan cycle. The draft received over 600 comments from citizens, CSOs, and public and private entities, which in many cases the MoC replied to with "will be taken under consideration," giving no specifics.[75] Some comments pointed out the harmfulness of some of the law's provisions such as interference in editorial policy, devoting 5% of annual gross income to content from independent productions, and responsibility on publishers for user-generated content (e.g., hate speech in comments can be fined anywhere from 100,000 to 1 million kuna).[76] The Agency for Electronic Media publishes data on the ownership structures of electronic media, down to the level of natural persons.[77] Representatives of GONG believe this is not sufficient because this does not always include the "real" owners, just the formal ones.[78] Drafting the Media Act has not started and, according to the MoC, if pending analysis and stakeholder opinions warrant, this milestone on adopting legislation will be included in the next action plan.[79]

9. Ongoing Data Opening	**Substantial**
	The Central State Office for Development of Digital Society started the project "Adaptation of information systems of public sector bodies to the Open Data Portal" in May 2019,[80] funded through OPEHR 2014–2020,[81] for 24 months. The project led to the completion of the analysis of stakeholders, good practices and standards in the existing open data system, and a proposal for improving the open data system and methodology for evaluating data values. Procurement for setting up a new open data system is ongoing.
	Despite completing most milestones, the current Open Data Portal is "dead" according to GONG,[82] in that it is difficult to navigate, lacks important datasets (datasets are sometimes outdated, not updated, and links to certain datasets are dead), and needs an overhaul (e.g., publishing "clean"[83] data in available, regularly updated datasets, and publishing specific datasets that are not yet available).[84] The State Office representative[85] believes this will be done in accordance to the analysis by the end of the project which is beyond the timeline of the action plan cycle.
10. Raising Awareness about Open Data	**Substantial**
	The Information Commissioner's Office (IC) carried out most of the planned activities, aside from organizing public events during the COVID-19 pandemic.[86] Financial constraints and differences in organizational vision led to dropping the Open Data Youth Academy activity (the milestone for raising awareness of young people on the reuse of open data).[87] However, the IC participated as a partner in a policy lab on climate data with young people.[88] The IC printed and published a "Manual on open data and re-use of information with steps for opening data" which is freely available in e-book form.[89] The postponed public events focusing on strengthening awareness, promoting and developing skills for open data use, and three workshops on proactive publishing and reuse of information are planned for implementation when the pandemic and post-earthquake situation improves. There is a proposal to transfer responsibility for the open data conference to the Central State Office for Development of Digital Society.[90]
11. Central State Portal Development	**Substantial**
	For details regarding the implementation and early results of this commitment, see Section 2.3
12. Public Consultations	**Limited**
	The Office for Cooperation with NGOs fully implemented three educational seminars and seven workshops (with three educational seminars per year and six workshops per year planned in the future), as well as a promotional campaign for citizens on social networks and TV commercials (January to June 2018).[91] The lead institution for this commitment changed from the Government Office for Cooperation with NGOs to the Government Legislative Office in July 2019.[92] According to both offices, the digital consultation system[93] adjusted to regulatory

	impact assessment procedures and to minor features based on user suggestions (such as receiving e-mail notifications, searching for consultations, and searching and analyzing comments and responses).[94] The Legislation Office plans to expand the joint interactive e-Consultation system for mobile and tablet devices and adapt it for disabled people.[95] The Database of Advisory Bodies[96] received only sporadic updates.
13. Building CSO Capacity for Anti-Corruption Activities	**Limited** The call for proposals was published December 2018, and closed 30 June 2020 after several temporary suspensions.[97] No contracts were awarded within the call and it seems likely to be annulled. According to public authorities,[98] potential applicants,[99] and CSOs,[100] the call is problematic because of the mandatory partnership required between the local authorities and local CSOs, which can create conflicts of interest.[101] It also "considerably reduces the number of CSOs that can embark on such projects, even though [the proposals] indicate that applicants should have sufficient financial, professional, experiential and implementing capacity for project implementation in partnership."[102]
14. OGP at Local and Regional Levels	**Limited** The Government Office for Cooperation with Non-Governmental Organizations started working on all three activities (piloting local open government action plans, local open data portals, and local online consultations) by organizing several preparatory meetings in 2019 to define further activities with the Information Commissioner's Office, Croatian County Association, Association of Cities in the Republic of Croatia, and the Association of Municipalities in the Republic of Croatia.[103] It also presented local-level OGP-related commitments and activities at the 2019 annual meeting of the Association of Cities. However, none of the activities went past the preparatory phase. The Office intends to reform the goals and timetable for implementing the commitment through a more active approach and coordination with the Association of Cities and the Association of Municipalities when drafting the next action plan.
15. OGP Sustainability	**Substantial** As planned, and according to the representative of the Ministry of Science and Education,[104] and several leading CSOs for education-related issues,[105] the cross-curricular Civic Education course,[106] and the Politics and Economics course[107] curriculum in 2019 included OGP-related topics and values. They will be taught to 490,000 primary and secondary school students, and other mentioned activities are underway.[108] OGP-relevant topics include human rights, responsibility and active citizenship, corruption risks and fighting corruption, financial, digital, and media literacy, technology, and ICT. However, the GOOD Initiative[109] warns that with making it a cross-curricular topic rather than an individual course, students will receive watered down content of a program that has already been underdeveloped, making it "a step back."[110] The Education and Teacher Training Agency plans to continue professional development activities from cross-curricular topics through collaborative planning,

		teaching and learning, and regular integration of OGP-values related topics.

[48] This was confirmed by the government's self-assessment implementation report, as well as in interviews with Ina Volmut and Lucija Jadrijević of the Information Commissioner's Ofc. (email interview by IRM researcher on 13 Nov. 2020) and Jagoda Botički, also of the Information Commissioner's Ofc. (email interview by the IRM researcher on 16 Nov. 2020).

[49] Educational films are permanently available for viewing on the Information Commissioner's website at https://www.pristupinfo.hr/dokumenti-i-publikacije/promotivni-materijali/ and on the Information Commissioner's Youtube channel at https://www.youtube.com/channel/UCyJrZJTY5iDXwzwtKlhbhEg. (Nov. 2020).

[50] Information Commissioner, "Kampanje za mlade – Želim znati, želim odlučivati: pravo na pristup informacijama" [Youth campaign: I want to know, I want to participate: the right to access information] (20 Dec. 2019), https://pristupinfo.hr/kampanja-za-mlade-zelim-znati-zelim-sudjelovati-pravo-na-pristup-informacijama/.

[51] For example, a webinar for users on exercising their right to access information was held on 17 December 2019 at: https://pristupinfo.hr/webinar-za-korisnike-kako-ostvariti-pravo-na-pristup-i-ponovnu-uporabu-informacija-17-prosinca-2019-u-14-sati/. Information on other webinars are available at: https://pristupinfo.hr/?s=webinar.

[52] The Information Commissioner's newsletter archive is available at: https://pristupinfo.hr/dokumenti-i-publikacije/newsletteri/.

[53] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

[54] Information Commissioner, "Upute, smjernice, obrasci" [Instructions, guidelines, forms] (Nov. 2020) https://pristupinfo.hr/pravni-okvir/upute-smjernice-obrasci/?lang=en.

[55] This is more than 100% over the planned number of assessments.

[56] Available at: https://www.pristupinfo.hr/dokumenti-i-publikacije/instrument-kvalitete-upitnik-za-samoprocjenu/.

[57] The document is available at: https://pravosudje.gov.hr/UserDocsImages/dokumenti/Antikorupcija/Antikorupcijski%20program%20za%20trgovacka%20drustva%20u%20ve%C4%87inskom%20vlasni%C5%A1tvu%20jedinica%20lokalne%20i%20podrucne_regionalne%20samouprave_JLPRSza%20razdoblje%202021_2022.pdf.

[58] The Program was available on the e-Consultation website from 6 to 21 November 2020 (shorter than the 30 prescribed days): https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=15246. The public consultation report was published on 5 December 2020: https://esavjetovanja.gov.hr/ECon/EconReport?entityId=15246.

[59] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*; Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview, 9 Nov. 2020.

[60] This partially had to do with the COVID-19 crisis in 2020. Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview, 9 Nov. 2020.

[61] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*; Marić (Ofc. for Cooperation with Non-Governmental Organizations), online interview, 9 Nov. 2020.

[62] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Financiranje programa i projekata udruga iz javnih izvora" [Financing programs and projects of associations from public sources] (Nov. 2020), https://udruge.gov.hr/financiranje-programa-i-projekata-udruga-iz-javnih-izvora/2772.

[63] *Id*. The training modules are available on the webpage of the State Administration School at: https://dsju.hr/dsju/calendar/workshop/list.

[64] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*; Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview, 9 Nov. 2020.

[65] "Hrvatski sabor" [Croatian Parliament] (Nov. 2020), https://www.sabor.hr.

[66] According to Croatian Parliament representatives, the following datasets are available: parliament members (active MPs, all MPs in all convocations, independent MPs, national minority representatives, and presidency), parliamentary clubs, parties and working bodies (for all convocations starting with the 4th), delegations and friendship groups, plenary session agendas, results of searches and minutes of plenary sessions (for all convocations starting with the 5th), financial data (reports on budget execution, budgetary plans, and financial reports), and information officers' annual reports, among others.

[67] The old webpage is available at: https://web.archive.org/web/20031219190040/http:/www.sabor.hr:80/.

[68] Due to COVID-19 impacts beginning March 2020, electronic voting was conducted only for MPs who could vote in the main Parliament hall, which had an electronic voting system. Other MPs voted by hand-raising in four halls in which, due to budgetary constraints, there are no electronic voting systems. Therefore, individual voting results of MPs are not available since the COVID-19 pandemic. Also, the Parliament building was damaged during the March 2020 earthquake, and sessions were held in other locations.

[69] GONG, "Hrvatski Sabor zalupio vrata otvorenim podacima" [The Croatian Parliament slammed the door on open data] (15 Jan. 2019), https://www.gong.hr/hr/dobra-vladavina/sabor/hrvatski-sabor-zalupio-vrata-otvorenim-podacima/; HINA, "Sabor zapanjio novom internetskom stranicom: Zalupili su vratima politici otvorenih podataka" [Parliament stunned with new website: They slammed the door on 'open data policy'] (net.hr, 15 Jan. 2019), https://net.hr/danas/hrvatska/sabor-zapanjio-novom-internetskom-stranicom-zalupili-su-vratima-politici-otvorenih-podataka/; Melissa Skender, "Iz Sabora i dalje ne odgovaraju kad će otvoriti podatke" [The Parliament does not answer when they will open the data] (GONG, 16 Jan. 2019), https://www.gong.hr/hr/dobra-

vladavina/sabor/iz-sabora-i-dalje-ne-odgovaraju-kad-ce-otvoriti-po/; Tešija (GONG), interview; Skender (GONG), interview.

[70] The Parliament's press service offered GONG a more in-depth answer in a press release. Croatian Parliament / Media Service, "Sabor: ispravak objavljenih informacija" [Parliament: correction of published information] (16 Jan. 2019), https://www.gong.hr/hr/dobra-vladavina/sabor/sabor-ispravak-objavljenih-informacija/.

[71] HND, "Počela izrada novog Zakona o elektroničkim medijima" [The drafting of a new law on electronic media has begun] (hnd.hr, 28 Mar. 2018), https://www.hnd.hr/pocela-izrada-novog-zakona-o-elektronickim-medijima.

[72] Ministry of Culture, "Odluka o imenovanju Radne skupine za izradu Zakona o elektroničkim medijima" [Decision on the appointment of the Working Group for the drafting of the Law on Electronic Media] (3 Mar. 2018), https://www.hnd.hr/uploads/files/Imenovanje_radna_skupina_Min_kult.pdf.

[73] European Parliament, Audiovisual Media Services Directive 2010/13/EU (Official J. of the European Union, 10 Mar. 2010), https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:32010L0013&from=EN. The AVMSD governs EU-wide coordination of national legislation on all audiovisual media, both traditional TV broadcasts and on-demand services, which must be fully implemented in all member states by September 2020. For more information, visit: https://ec.europa.eu/digital-single-market/en/audiovisual-media-services-directive-avmsd.

[74] Ministry of Culture, Nacrt prijedloga Zakona o elektroničkim medijima [Draft Bill on Electronic Media] (Zagreb: e-Consultations, Feb. 2020), https://esavjetovanja.gov.hr/ECon/MainScreen?entityId=13393.

[75] Comments, "Izvješće o provedenom savjetovanju – Nacrt prijedloga Zakona o elektroničkim medijima" [Report on the conducted consultation - Draft Bill on Electronic Media] (e-Consultations, Mar. 2020), https://esavjetovanja.gov.hr/ECon/EconReport?entityId=13393.

[76] Gordan Duhaček, "Novi HDZ-ov Zakon o elektroničkim medijima ograničit će slobodu i medija i građana" [The new HDZ Law on Electronic Media will restrict the freedom of both the media and citizens] (Index.hr, 10 Dec. 2020), https://www.index.hr/vijesti/clanak/novi-hdzov-zakon-o-elektronickim-medijima-ogranicit-ce-slobodu-i-medija-i-gradjana/2235288.aspx; Ivana Brkić Tomljenović, "Komercijalne televizije na udaru novog zakona: 'To će ugroziti poslovanje. Vjerujemo da to pogoduje određenim interesnim skupinama'" [Commercial television hit by new law: "It will jeopardize business. We believe it benefits certain interest groups"] (Dnevnik.hr, 10 Dec. 2020), https://dnevnik.hr/vijesti/hrvatska/novi-zakon-o-elektronickim-medijima---631690.html.

[77] These registers are also published in a reusable and easily searchable format (Excel spreadsheet) on the website of the Agency for Electronic Media (Nov. 2020, https://www.aem.hr/).

[78] Skender (GONG), online interview, 11 Nov. 2020. For more information, see Andreja Žapčić, "Tko su stvarni vlasnici "vlasnika" najžilavijih medija?" [Who are the real owners of the "owners" of the toughest media?] (GONG, 13 Feb. 2014), https://www.gong.hr/hr/dobra-vladavina/mediji/tko-je-stvarni-vlasnik-vlasnika-najzilavijeg-medij/.

[79] Government of the Republic of Croatia, Croatia End-of-Term Self-Assessment 2018-2020.

[80] Ministry of Labor, Pension System, Family and Social Policy, "Potpisani ugovori za projekt 'Prilagodba informacijskih sustava tijela javnog sektora Portalu otvorenih podataka (open data)'" [Contracts signed for the project "Adaptation of information systems of public sector bodies to the Open Data Portal"] (28 May 2019), http://www.esf.hr/potpisani-ugovori-za-projekt-prilagodba-informacijskih-sustava-tijela-javnog-sektora-portalu-otvorenih-podataka-open-data/.

[81] Croatian Government & European Commission, Operational Programme Under the 'Investment for Growth and Jobs' Goal (2014), http://www.esf.hr/wordpress/wp-content/uploads/2015/02/FINAL-OP-EHR.pdf. Operational programs are detailed plans in which EU Member States establish how much money from the European Structural and Investment Funds (ESIF) will be spent during the programming period. They can be drawn up for a specific region or a country-wide thematic goal (e.g., environment).

[82] Skender (GONG), online interview, 11 Nov. 2020.

[83] For example, not all fields in the database have data, or the format is incoherent. The currency format varies between text and numbers. Data is not connected (e.g., there are names of legal entities, but without their unique OIB numbers, making it impossible to cross-reference data from other datasets).

[84] Miroslav Schlossberg (HrOpen), email interview by IRM researcher, 12 Nov. 2020.

[85] Božo Zeba (Central State Ofc. for Dev't of Digital Society), online interview by IRM researcher, 13 Nov. 2020.

[86] Government of the Republic of Croatia, Croatia End-of-Term Self-Assessment 2018-2020; Ina Volmut and Lucija Jadrijević (Information Commissioner's Ofc.), email interview by IRM researcher, 13 Nov. 2020.

[87] Zoran Pičuljan (Information Commissioner) and Ina Volmut and Lucija Jadrijević (Ofc. of the Information Commissioner), interview by IRM researcher, 21 Feb. 2019. See also Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Zapisnik S 4. sjednice savjeta inicijative partnerstvo za otvorenu vlast" [Minutes from the 4th session of the Open Government Partnership Initiative Council] (18 Feb. 2019), https://udruge.gov.hr/UserDocsImages//dokumenti//Zapisnik%20-%204.%20sjednica%20Savjeta%20inicijative%20POV%20-%203.%20mandat.pdf.

[88] Ofc. for Cooperation with NGOs, "Three days interactive education program for youth 'Open climate' was held" (20 Apr. 2020), https://udruge.gov.hr/news/three-days-interactive-education-program-for-youth-open-climate-was-held/5139.

[89] The 2018 manual is regularly distributed at all trainings and events organized by the Information Commissioner and available at: https://www.pristupinfo.hr/wp-content/uploads/2018/10/Otvoreni_podaci_za_sve_E-book_final_small-1.pdf.

[90] Volmut and Jadrijević (Information Commissioner's Ofc.), email interview, 13 Nov. 2020.

[91] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*; Darija Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), online interview by IRM researcher, 11 Nov. 2020; Nikolina Matić (Government Legislation Ofc.), email interview by IRM researcher, 16 Nov. 2020.

[92] At the 163rd session of the Croatian government (held 27 June 2019), Regulation on the Government Legislation Office, Amendments to the Regulation on the Government Office for Cooperation with Non-Governmental Organizations, and Regulation on the Internal Organization of the Central State Office for Development of Digital Society (all published in the *Official Gazette* 63/19) were adopted to "better prepar[e] documents before their publication on the central state Internet portal for public consultation (e-Consultation)." The Legislation Office performs these tasks in cooperation with the Office of the Prime Minister and is responsible for development of the digital society.

[93] "e-Savjetovanja" [e-Consultations] is available at: https://savjetovanja.gov.hr/.

[94] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*. During the first half of 2019, minor improvements were made to the system's functionality.

[95] This was done in accordance with legal requirements prescribed by the Croatian Access to Websites and Software Solutions for Mobile Devices of Public Sector Bodies Act (*Official Gazette* 17/19).

[96] E-Consultations, "Baza savjetodavnih tijela" [Database of advisory bodies] (Nov. 2020), https://savjetovanja.gov.hr/baza-savjetodavnih-tijela/1118.

[97] European Structural and Investment Funds, "Tenders: Cooperation of civil society organizations and local authorities on the prevention of corruption and conflicts of interest in the implementation of public policies" (7 Dec. 2018), https://strukturnifondovi.hr/natjecaji/suradnja-organizacija-civilnoga-drustva-i-lokalnih-vlasti-na-prevenciji-korupcije-i-sukoba-interesa-u-provedbi-javnih-politika/. The general objective of the call was to improve the role of CSOs in promoting and applying good governance. Specific goals are: increased cooperation transparency between public authorities and civil society; strengthened capacity of CSOs to actively contribute to implementing anticorruption measures; further improved implementation of consultations with interested public; strengthened professional, analytical, and advocacy capacity of CSOs to provide decision-making support at local and regional levels; digitized local and regional authorities for active citizen participation in decision-making on utilities and other functions.

[98] The sources wished to remain anonymous regarding this issue.

[99] Each call for proposals has an in-built Q&A procedure. According to five out of eight questions posed between 7 December 2018 and 17 January 2019, the biggest issue applicants had was the mandatory partnership with local authorities in which they are founded. Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Suradnja organizacija civilnoga društva i lokalnih vlasti na prevenciji korupcije i sukoba interesa u provedbi javnih politika" [Cooperation between civil society organizations and local authorities on prevention corruption and conflicts of interest in the implementation of public policies] (17 Jan. 2019), https://strukturnifondovi.hr/wp-content/uploads/natjecaji/suradnja-organizacija-civilnoga-drustva-i-lokalnih-vlasti-na-prevenciji-korupcije-i-sukoba-interesa-u-provedbi-javnih-politika-16011/Pitanja-i-odgovori_korupcija_0712-1701.pdf.

[100] Tešija (GONG), interview, 21 Feb. 2019; Berković and Skender (GONG), online interview, 11 Nov. 2020.

[101] Most Croatian CSOs are in the four largest cities (Zagreb, Split, Rijeka, and Osijek). This narrows opportunities for cooperation, especially in less developed local authorities that have no "strong" and independent CSOs. Applicants believe this contributes to increasing inequalities in establishing strategic documents (e.g., Europe 2020, EU Anti-Poverty, Social Exclusion Platform etc.) listed in the call. When asked to consider this comment and allow applicants to submit project proposals in partnership with local authorities independent of the Association's registration, the official answer was "Thank you for your comment." GONG, as the largest and most competent association in Croatia on these issues, decided not to respond to the call given that the mayor of Zagreb (GONG's main location) repeatedly appears in corruption-related court cases; GONG feels this would be a conflict of interest. GONG's request to revoke the call was supported by over twenty other associations. Hina, "Kako ići u borbu protiv korupcije s Milanom Bandićem?" [How to go in the fight against corruption with Bandic?] (GONG, 28 Jan. 2019), https://www.gong.hr/hr/dobra-vladavina/antikorupcijska-politika/kako-ici-u-borbu-protiv-korupcije-s-milanom-bandic/.

[102] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Suradnja organizacija civilnoga društva i lokalnih vlasti na prevenciji korupcije i sukoba interesa u provedbi javnih politika" [Cooperation between civil society organizations and local authorities on prevention corruption and conflicts of interest in the implementation of public policies], question 4, 3-4.

[103] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

[104] Darko Tot, the person responsible for this commitment within the Ministry of Science and Education reported on the status of the commitment at the OGP Council meeting. Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Zapisnik S 4. sjednice savjeta inicijative partnerstvo za otvorenu vlast" [Minutes from the 4th session of the Open Government Partnership Initiative Council].

[105] Mario Bajkuša, from the Forum za slobodu odgoja (Forum for Free Education), confirmed that the adopted curricula include the stated OGP values. *Id.* This was confirmed by Dražen Hoffman (GONG) in an email interview conducted by the IRM researcher on 16 Nov. 2020.

[106] Ministry of Science and Education, "Odluka o donošenju kurikuluma za međupredmetnu temu Građansko odgoj i obrazovanje za osnovne i srednje škole u Republici Hrvatskoj" [Decision on the adoption of the curriculum for the cross-curricular topic Civic education for primary and secondary schools in the Republic of Croatia] (*Official Gazette*, Oct. 2019), https://narodne-novine.nn.hr/clanci/sluzbeni/2019_01_10_217.html.

[107] Ministry of Science and Education, "Odluka o donošenju kurikuluma za nastavni predmet Politike i gospodarstva za gimnazije u Republici Hrvatskoj" [Decision on the adoption of the curriculum for the subject of Politics and Economics for grammar schools in the Republic of Croatia] (*Official Gazette* Jul. 2019), https://narodne-novine.nn.hr/clanci/sluzbeni/2019_01_7_159.html.

[108] Government of the Republic of Croatia, *Croatia End-of-Term Self-Assessment 2018-2020*.

[109] The GOOD Initiative brings together civil society organizations dealing with informal education and human rights. They advocate for a systematic and quality introduction of education and training on human rights and democratic citizenship into the educational system (http://goo.hr/). The GOOD Initiative started an advocacy platform named "Obrazovna zviždaljka" (Education whistle) that deals with issues in the education system in general, including civic education. Good Initiative, "Obrazovna zviždaljka" [Education whistle] (accessed 4 May, 2021), http://oz.goo.hr/kljucna-podrucja/. *See also*, GOOD Initiative, "Reforma obrazovanja ili poligon za političke utjecaje" [Education reform or a testing ground for political influence?] (25 May 2018), https://goo.hr/reforma-obrazovanja-ili-poligon-za-politicke-utjecaje/.

[110] Good Initiative, "Novi kurikulum Građanskog odgoja i obrazovanja – novi korak unatrag" [A new curriculum for Civic Education - a new step backwards] (GOOD Initiative, 8 Feb. 2019), http://goo.hr/novi-kurikulum-gradanskog-odgoja-i-obrazovanja-novi-korak-unatrag/; N1 Croatia, "GOOD Inicijativa: Novi kurikulum Građanskog odgoja – novi korak unatrag" [GOOD Initiative: A new Civic Education curriculum - a new step backwards] (Aug. 2019), http://hr.n1info.com/Vijesti/a368978/GOOD-Inicijativa-Novi-kurikulum-Gradjanskog-odgoja-novi-korak-unatrag.html.

III. Multistakeholder Process

3.1 Multistakeholder process throughout action plan implementation

In 2017, OGP adopted the OGP Participation and Co-Creation Standards intended to support participation and co-creation by civil society at all stages of the OGP cycle. All OGP-participating countries are expected to meet these standards. The standards aim to raise ambition and quality of participation during development, implementation, and review of OGP action plans.

OGP's Articles of Governance also establish participation and co-creation requirements a country or entity must meet in their action plan development and implementation to act according to the OGP process. Croatia **did not act contrary** to OGP process.[111]

Please see Annex I for an overview of Croatia's performance implementing the Co-Creation and Participation Standards throughout the action plan implementation.

Table 3.2: Level of Public Influence

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply it to OGP.[112] In the spirit of OGP, most countries should aspire to "collaborate."

Level of public influence		During development of action plan	During implementation of action plan
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✔	
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.		✔
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

As during implementation of the previous two action plans (2012–2013 and 2014–2016), the Open Government Partnership Initiative Council drafted this Action Plan and monitored its implementation. The Council consisted of 25 members including representatives of state, local, and regional authorities, civil society organizations, academia, and the media. The Government Office for Non-Governmental Organizations provided expert and administrative support to the Council, in close cooperation with the Ministry of Foreign and European Affairs, whose Secretary of State chaired the Council.

During implementation of the action plan, the Council held two sessions, one on 18 February 2019 and one on 29 October 2019, while regular communication between Council members was maintained via email during the COVID-19 pandemic in 2020. A Council meeting was held online in December 2020.

CSO representatives were able to voice their opinions and concerns at the Council sessions.[113] However, unlike the co-creation process, there were no guarantees that their input would be heeded by the state bodies implementing the Action Plan, due to some activities being strictly linked to EU-funded projects[114] (meaning there is little room for change once implementation begins) and some being linked to legislative or other processes with rigid guidelines.

Additionally, during 2019, Council members (mostly reduced to lead and supporting institutions implementing measures such as Ministry of Culture, Ministry of Administration, State Electoral Commission, Croatian Parliament, and the Government Legislation Office) participated in several thematic meetings to provide updates on implementation of certain key measures, and agree on the continuation of implementation.[115]

Interviewed CSO members of the Council stated that they occasionally received emails regarding OGP activities during the implementation period, but were not sought out for their input.[116] Also, several interviewed CSOs commented that they are losing enthusiasm[117] for continued participation in the OGP process, and that they feel their "valuable resources are being squandered"[118] on a process that lacks the full support of the Government, while state representatives noted their dissatisfaction with CSO participation in the OGP process.[119]

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[111] Acting Contrary to Process - Country did not meet (1) "involve" during the development or "inform" during implementation of the action plan, or (2) the government fails to collect, publish and document a repository on the national OGP website/webpage in line with IRM guidance.

[112] IAP2, "IAP2's Public Participation Spectrum" (2014), https://cdn.ymaws.com/www.iap2.org/resource/resmgr/pillars/Spectrum_8.5x11_Print.pdf.

[113] OGP Council session details are found at: Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council] (accessed 4 May 2021), https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289.

[114] For example, these include activities under Commitments 5 and 9.

[115] Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), interview, 9 Nov. 2020.

[116] Berković and Skender (GONG), online interview, 11 Nov. 2020.

[117] Ott and Bronić (Institute of Public Finance), email interview, 13 Nov. 2020..

[118] Berković and Skender (GONG), online interview, 13 Nov. 2020.

[119] According to an online interview with Darija Marić (Government Office for Cooperation with Non-Governmental Organizations), conducted online on 9 Nov. 2020, this includes, the Croatian County Association, Association of Cities in the Republic of Croatia, Zelena Akcija, Institute for Public Administration, and Croatian Journalists' Association, some of which have repeatedly failed to participate in OGP Council meetings, not named new representatives after management changes, or do not participate in activities they were named to co-implement.

3.2 Overview of Croatia's performance throughout action plan implementation

Key:
Green= Meets standard
Yellow= In progress (steps have been taken to meet this standard, but standard is not met)
Red= No evidence of action

Multistakeholder Forum	During Development	During Implementation
1a. Forum established: The Croatian OGP Council oversees the creation and implementation of the action plan, and is established by Government Decision.[120]	Green	Green
1b. Regularity: The OGP Council met three times during the implementation period: once in 2018, twice in 2019.[121] However, meetings planned for 2020 had to be postponed due to the COVID-19 pandemic, and only bilateral meetings were held with implementing bodies.[122]	Yellow	Yellow
1c. Collaborative Mandate Development: This was assessed in the previous Design Report	Green	
1d. Mandate public: Information on the OGP Council, membership, meetings, and meeting minutes are available on the OGP webpage.[123]	Green	Green
2a. Multistakeholder: The OGP Council includes representatives from the government (13), civil society (10) and academia (2).[124]	Green	Green
2b. Parity: The OGP Council has an even balance of governmental and nongovernmental representatives.	Green	Green
2c. Transparent selection: N/A (There were no changes to the civil society stakeholders.)	Green	
2d. High-level government representation: The OGP Council includes high-level representatives with decision-making authority from the government (e.g., state secretaries and heads of state bodies).[125]	Green	Green
3a. Openness: The OGP Council accepts input on action plan implementation from stakeholders outside the forum by including non-members in meetings and OGP-related events. In practice, this input has come from other government ministries involved in implementation, and the IRM researcher.	Green	Green

3b. Remote participation: There were opportunities for remote participation in OGP Council meetings when the occasion demanded it, but meetings are not usually live-streamed.[126]	Green	Yellow
3c. Minutes: The OGP Council's meeting minutes are available on the OGP webpage, after they are adopted at the next meeting.[127] The self-assessment report on action plan implementation is always adopted by the Government and publicly available.[128]	Yellow	Yellow

Key:
Green= Meets standard
Yellow= In progress (steps have been taken to meet this standard, but standard is not met)
Red= No evidence of action

Action Plan Implementation	
4a. Process transparency: There are no regular updates regarding progress on commitments or milestones on the national OGP website.[129]	Red
4b. Communication channels: The national OGP website does not allow public comment on action plan updates.[130]	Red
4c. Engagement with civil society: The government held two open meetings with civil society in 2019, but not in 2020 due to COVID-19, to discuss the implementation of the national action plan.[131]	Green
4d. Cooperation with the IRM: The government shares IRM reports (such as the latest IRM Design Report) with OGP Council members and all implementing bodies to encourage input during the public comment phase. There is no evidence that it shared the IRM report with outside government institutions.[132]	Yellow
4e. MSF engagement: The OGP Council monitors and deliberates improving implementation of the national action plan in Council meetings. Bilateral meetings with implementing bodies to monitor implementation do not include CSOs.	Green
4f. MSF engagement with self-assessment report: The government submitted the draft end-of-term self-assessment report draft for comments and feedback to OGP Council members in mid-November 2020. A Council e-meeting was held 15 December 2020.	Green
4g. Repository: The government documents, collects, and publishes a repository on the national OGP website[133] in line IRM guidance.[134]	Green

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[120] Government of the Republic of Croatia, "Odluka o osnivanju Savjeta inicijative Partnerstva za otvorenu vlast" [Decision on the establishment of the Open Government Partnership Initiative Council] (23 Feb. 2017), https://udruge.gov.hr/UserDocsImages/dokumenti/Odluka%20o%20osnivanju%20Savjeta%20inicijative%20Partners tva%20za%20otvorenu%20vlast%20-%202017.pdf; Government of the Republic of Croatia, "Odluka o dopuni Odluke o osnivanju Savjeta inicijative Partnerstva za otvorenu vlast" [Decision amending the Decision on the Establishment of the Open Government Partnership Initiative Council] (21 Mar. 2019), https://udruge.gov.hr/UserDocsImages/dokumenti/Odluka%20o%20dopuni%20Odluke%20o%20osnivanju%20Savje ta%20inicijative%20Partnerstva%20za%20otvorenu%20vlast.pdf.

[121] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council].

[122] Marić (Gov. Ofc. for Cooperation with Non-Governmental Organizations), interview, 9 Nov. 2020.

[123] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council].

[124] Government of the Republic of Croatia, "Odluka o osnivanju Savjeta inicijative Partnerstva za otvorenu vlast" [Decision on the establishment of the Open Government Partnership Initiative Council], 23 Feb. 2017;; Government of the Republic of Croatia, "Odluka o dopuni Odluke o osnivanju Savjeta inicijative Partnerstva za otvorenu vlast" [Decision amending the Decision on the Establishment of the Open Government Partnership Initiative Council], 21 Mar. 2019.

[125] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council].

[126] E.g., the independent researcher participated remotely in the OGP Council meeting held on 29 October 2019 regarding the IRM Design Report for Croatia.

[127] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council].

[128] This document will be published after adoption by the government, according to point of contact, Darija Marić, from the Government Office for Cooperation with Non-Governmental Organizations (interview, 9 Nov. 2020).

[129] The OGP webpage only offers the action plan text and an explanation on how it was drafted. Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Provedba Akcijskog plana za provedbu inicijative Partnerstvo za otvorenu vlast u Republici Hrvatskoj za razdoblje do 2020. Godine" [Implementation of the Action Plan for the implementation of the Open Government Partnership initiative in the Republic of Croatia for the period until 2020] (accessed 4 May 2021), https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/provedba-akcijskog-plana-za-provedbu-inicijative-partnerstvo-za-otvorenu-vlast-u-republici-hrvatskoj-za-razdoblje-do-2020-godine/4898.

[130] Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Partnerstvo za otvorenu vlast" [Open Government Partnership] (accessed 4 May 2021), https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/271.

[131] All information on OGP Council activities is available on the OGP website. Gov. Ofc. for Cooperation with Non-Governmental Organizations, "Savjet inicijative Partnerstvo za otvorenu vlast" [Open Government Partnership Council] (accessed 4 May 2021), https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289.

[132] Agendas for the 4th and 5th meetings of the OGP Council had a bullet point devoted to the IRM report, and the IRM researcher participated in both meetings. The first occurred 18 Feb. 2019 in person, and the second was held 29 Oct. 2019 remotely.

[133] See https://udruge.gov.hr/istaknute-teme/partnerstvo-za-otvorenu-vlast-271/savjet-inicijative-partnerstvo-za-otvorenu-vlast/289.

[134] IRM, *Guidance for Online Repositories*, (OGP, 1 Mar. 2020), https://www.opengovpartnership.org/documents/irm-guidance-for-online-repositories/

IV. Methodology and Sources

Research for IRM reports is carried out by national researchers. All IRM reports undergo a process of quality control led by IRM staff to ensure that the highest standards of research and due diligence have been applied.

The International Experts Panel (IEP) of the IRM oversees the quality control of each report. The IEP is composed of experts in transparency, participation, accountability, and social science research methods.

Current membership of the International Experts Panel is

- César Cruz-Rubio
- Mary Francoli
- Brendan Halloran
- Jeff Lovitt
- Juanita Olaya

This review process, including the procedure for incorporating comments received, is outlined in greater detail in Section III of the Procedures Manual[135] and in Croatia's 2018–2020 Design Report.

About the IRM

The **Open Government Partnership (OGP)** aims to secure concrete commitments from governments to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism (IRM) assesses development and implementation of national action plans to foster dialogue among stakeholders and improve accountability.

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[135] IRM, *IRM Procedures Manual,* (OGP, 16 Sept. 2017), https://www.opengovpartnership.org/documents/irm-procedures-manual.

Annex I. IRM Indicators

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.[136] A summary of key indicators the IRM assesses is below:

- **Verifiability**:
  - Not specific enough to verify: As written in the commitment, do the objectives stated and actions proposed lack sufficient clarity and specificity for their completion to be objectively verified through a subsequent assessment process?
  - Specific enough to verify: As written in the commitment, are the objectives stated and actions proposed sufficiently clear and specific to allow for their completion to be objectively verified through a subsequent assessment process?
- **Relevance**: This variable evaluates the commitment's relevance to OGP values. Based on a close reading of the commitment text as stated in the action plan, the guiding questions to determine the relevance are:
  - Access to Information: Will the government disclose more information or improve the quality of the information disclosed to the public?
  - Civic Participation: Will the government create or improve opportunities or capabilities for the public to inform or influence decisions or policies?
  - Public Accountability: Will the government create or improve public facing opportunities to hold officials answerable for their actions?
- **Potential impact**: This variable assesses the potential impact of the commitment, if completed as written. The IRM researcher uses the text from the action plan to:
  - Identify the social, economic, political, or environmental problem;
  - Establish the status quo at the outset of the action plan; and
  - Assess the degree to which the commitment, if implemented, would impact performance and tackle the problem.
- **Completion**: This variable assesses the commitment's implementation and progress. This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.
- **Did It Open Government?:** This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice, in areas relevant to OGP values, has changed as a result of the commitment's implementation. This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

Results-oriented commitments?

A potentially starred commitment has more potential to be ambitious and to be implemented. A good commitment design is one that clearly describes the:

1. **Problem**: What is the economic, social, political, or environmental problem rather than describing an administrative issue or tool (e.g., 'misallocation of welfare funds' is more helpful than 'lacking a website')?
2. **Status quo**: What is the status quo of the policy issue at the beginning of an action plan (e.g., '26% of judicial corruption complaints are not processed currently')?
3. **Change**: Rather than stating intermediary outputs, what is the targeted behavior change that is expected from the commitment's implementation (e.g., 'doubling response rates to information requests' is a stronger goal than 'publishing a protocol for response)?

Starred commitments

One measure, the "starred commitment" (✪), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries/entities. To receive a star, a commitment must meet several criteria:

- The commitment's design should be **Verifiable**, **Relevant** to OGP values, and have **Transformative** potential impact. As assessed in the Design Report.
- The commitment's implementation must be assessed in the IRM Implementation Report as **Substantial** or **Complete**.

This variable is assessed at the end of the action plan cycle, in the IRM Implementation Report.

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[136] IRM, *IRM Procedures Manual.* https://www.opengovpartnership.org/documents/irm-procedures-manual