

# **Independent Reporting Mechanism**

Action Plan Review:  
Kosovo 2023–2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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**Editorial note:** In March 2023, the OGP Steering Committee approved a decision to allow non-universally recognized states, as determined by United Nations (UN) membership, to become members of OGP. Membership of the UN and its Specialized Agencies is governed by the Charter of the United Nations and by the respective specialized agencies. OGP and the Independent Reporting Mechanism (IRM) do not possess the authority to recognize either a State or a Government. OGP members that are not universally recognized are not eligible to run for the OGP Steering Committee or vote in the selection of its members. Participation in OGP does not constitute support or recognition of a State's international status, nor shall it affect the individual position of any OGP participant in this regard.

## Section I: Overview of the 2023-2025 Action Plan

*Kosovo's first action plan addresses key areas of open government, including open data, citizen participation in decision-making, public procurement, and political finance transparency. The action plan saw an ambitious co-creation process with active involvement of the National Coordinating Council, Kosovo's multi-stakeholder forum. The Ministry of Local Government Administration should maintain this momentum by engaging civil society in the implementation of the commitments.*

Kosovo's 2023-2025 action plan, its first as a non-voting member of OGP, comes 10 years after the Government of Kosovo first expressed interest in joining OGP in 2013.<sup>1</sup> The action plan contains 13 commitments covering digital public services, open data, public participation, and anti-corruption.<sup>2</sup> The commitments align with the government's priorities around good governance, anti-corruption, transparency, and digitalization of the public sector.

In March 2023, the OGP Steering Committee approved a decision that allowed non-universally recognized states (as defined by membership in the United Nations) to become non-voting members in OGP.<sup>3</sup> While waiting for that opportunity, Kosovo worked to meet OGP's technical eligibility criteria, passed the Values Check, and prepared an OGP action plan. Once the Steering Committee made its decision, Kosovo sent the letter of interest to join OGP on 17 July 2023.<sup>4</sup> On 31 July 2023, the Steering Committee welcomed Kosovo's membership in OGP and invited Kosovo to attend the OGP Global Summit in Tallinn, Estonia, on 6-7 September 2023.<sup>5</sup>

The Ministry of Local Government Administration (MLGA) created the National Coordinating Committee (NCC) in October 2021 as Kosovo's multi-stakeholder forum. The co-creation process started with a two-month consultation period from 8 March to 29 April 2022 and involved 11 NCC meetings, including four thematic workshops and seven public discussions in major municipalities of Kosovo. A civil society representative noted that the MLGA point of contact's background in civil society helped facilitate a highly open and participatory co-creation process.<sup>6</sup> In September-October 2022, the MLGA published the draft action plan for public consultation and a budget was prepared in November 2022 for government approval in December 2022.<sup>7</sup> When it was confirmed that Kosovo was eligible to join OGP, the MLGA organized another round of consultations on the action plan from May to July 2023. The action plan was approved in December 2023.<sup>8</sup>

### AT A GLANCE

**Participating since:** 2023 (as a non-voting member)

**Number of commitments:** 13

#### Overview of commitments:

Commitments with an open government lens: 13 (100%)

Commitments with substantial potential for results: 0

Promising commitments: 2

#### Policy areas:

- Digital governance
- Open data
- Citizen participation
- Civic space
- Public procurement
- Political finance

**Compliance with OGP minimum requirements for co-creation:** No

Future co-creation processes could benefit from greater documentation on Kosovo's OGP website. For example, the MLGA could publish the co-creation timeline and overview of the opportunities for stakeholders to participate at least two weeks before the start of the action plan development process. The MLGA could also publish detailed feedback for the selection of commitments, including justifications for why commitment proposals were or were not adopted.

The commitments are ambitious and relevant to Kosovo's goal of joining the European Union (EU). The IRM identified two commitments as promising, which could greatly improve open government practices in Kosovo. Commitment 4.1 aims to open data at all stages of public procurement by passing amendments to the Law on Public Procurement. This commitment could enhance e-procurement in Kosovo and align Kosovo's procurement policies with the EU's 2014 Procurement Directive. Commitment 4.3 involves developing a platform for open data on the finances (revenue and expenditure) of registered political parties. Many of the commitments, while verifiable, would benefit from clearer descriptions of the expected changes to existing practices from their implementation.

As this is Kosovo's first action plan, it will be important to maintain political momentum by regularly informing the NCC on commitment implementation. Moreover, the MLGA should ensure that Kosovo meets OGP's Participation and Co-Creation Standards during implementation of the action plan. This involves:

- updating Kosovo's OGP website at least twice a year with evidence for implementation of the commitments,
- holding at least two meetings each year with civil society (i.e., through the NCC) to present the results on action plan implementation and collect comments.

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<sup>1</sup> Republic of Kosovo, Open Government Partnership National Action Plan 2023-25, [https://www.opengovpartnership.org/wp-content/uploads/2023/12/Kosovo\\_Action-Plan\\_2023-2027\\_December\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/12/Kosovo_Action-Plan_2023-2027_December_EN.pdf)

<sup>2</sup> Kosovo adopted an OGP action plan for 2014-2016, before it became a non-voting member of OGP, but the implementation of this plan was limited. Fidan Kajala (Point of Contact, Government of Kosovo) and Blerta Thaçi (Executive Director, Open Data Kosovo), interviews by the IRM, 23 May 2024.

<sup>3</sup> Open Government Partnership, Proposal to amend the policy on who can become an OGP member, 2 March 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/03/SC\\_Proposal-on-OGP-membership-requirements-For-SC-approval\\_20230307-.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/03/SC_Proposal-on-OGP-membership-requirements-For-SC-approval_20230307-.pdf)

<sup>4</sup> Open Government Partnership, Kosovo – Letter of intent to join OGP, 29 August 2023, <https://www.opengovpartnership.org/documents/kosovo-letter-of-intent-to-join-ogp/>

<sup>5</sup> Open Government Partnership, 31 July 2023, [https://www.opengovpartnership.org/wp-content/uploads/2023/08/Kosovo\\_Co-Chairs-Welcome-Letter\\_20230731.pdf](https://www.opengovpartnership.org/wp-content/uploads/2023/08/Kosovo_Co-Chairs-Welcome-Letter_20230731.pdf)

<sup>6</sup> Civil society co-chair of the NCC, interview by the IRM.

<sup>7</sup> Open Data Kosovo website, <https://opendatakosovo.medium.com/kosovo-towards-a-new-national-action-plan-for-ogp-d44e2f3fb6a3>

<sup>8</sup> Fidan Kajala (POC), correspondence with the IRM, June 2024.

## Section II: Promising Commitments in the Kosovo 2023-2025 Action Plan

The following review looks at the two commitments and one cluster that the IRM identified as having the potential to realize the most promising results. Given the high level of ambition, promising commitments address a policy area that is important to stakeholders or the national context, are verifiable, have a relevant open government lens, and have substantial potential for results. This review also provides an analysis of challenges, opportunities, and recommendations to contribute to the learning and implementation process of this action plan.

**Table 1. Promising commitments**

Promising Commitments
<b>4.1. Fully open public procurement system:</b> This commitment aims to open up data-related public procurement by passing amendments to the Law on Public Procurement.
<b>4.2. Increasing transparency, accountability, and financial control of political parties registered in the Republic of Kosovo:</b> This commitment aims to create an online platform with open data on the finances of registered political parties.

### **Commitment 4.1: Fully open public procurement system** (Ministry of Finance, Public Procurement Regulatory Commission)

For a complete description of this commitment, see Commitment 4.1 in the action plan [here](#).

#### **Context and objectives**

Kosovo has a well-managed fiscal policy, with a need to expand public services and close infrastructure gaps.<sup>9</sup> The construction sector is growing and there is a need to reduce corruption risks in public investment.<sup>10</sup> The construction sector is more prone to corruption than most other economic sectors due to the size, complexities, multi-year nature, high cost, and inherent risks in the built environment.<sup>11</sup> In Kosovo, an estimated €800 million of public spending annually goes through the procurement system, which is perceived as having irregularities and gaps in the discipline and monitoring of public officials.<sup>12</sup> The IMF-led Public Investment Management Assessment (PIMA) from 2016 and a 2023 update identified a need to strengthen the project appraisal process, improve the pace of project implementation, and increase central support for major projects.<sup>13</sup> The original PIMA referenced a report of the Auditor General identifying several risks in Kosovo, including poor procurement planning, splitting of tenders to avoid the open procurement procedure, customization of the tender criteria favoring certain operators, weaknesses in tender evaluations, and entry into contracts with abnormally low prices.<sup>14</sup>

Kosovo's e-procurement system<sup>15</sup> includes open data and documents across the whole procurement cycle, including procurement plans, tender dossiers, signed PDF contracts, and information such as the bidders, buyer, supplier, procurement method, tender and contract value.<sup>16</sup> In December 2021, the system had 30,500 users, of which 11,500 are contractors and 350 are auditors and an Application Programming Interface (API) was added to make the data easily exportable.<sup>17</sup> However, the European Commission's 2023 Progress Report noted that Kosovo needs to update the system to ensure its full functionality and bring its legislation in line with the EU *acquis*.<sup>18</sup> The government has added new elements to it, making it difficult to

navigate for non-experts.<sup>19</sup> According to a report by the Kosovo Law Institute in August 2024, there is a pressing need in Kosovo for a new procurement law to ensure the full operationalization of the e-procurement system.<sup>20</sup> While the e-procurement system generally makes procurement procedures open and transparent, not all of its modules, such as contract management, are fully utilized by contracting authorities.<sup>21</sup> The action plan notes that there are ongoing violations of the existing law by procurement officials and few punishments for these violations, preventing efficient public procurement in Kosovo. While the system allows for appeals to be filed to challenge procurement awards, it needs to be updated to guarantee its functionality.<sup>22</sup> Other deficiencies are the limited capacity of the Procurement Review Board (PRB) to review and handle complaints in time, and a lack of regular training for judges who deal with corruption cases in public procurement.

This commitment aims to open data related to all levels of public procurement in a machine-readable format on Kosovo's e-procurement system. The milestones entail reviewing existing deficiencies in the e-procurement system, approving amendments to the Law on Public Procurement, and developing new rules, tools, and guidelines for the e-procurement system. The Public Procurement Regulatory Commission (PPRC) is overseeing the process of amending the law, along with a working group consisting of representatives of public institutions, CSOs, private sector, and international organizations.<sup>23</sup>

#### **Potential for Results: Modest**

The adoption of the amendments to the Law on Public Procurement could bring Kosovo's legislation fully in line with the EU Directive. The draft amendments have not been discussed publicly, but non-governmental stakeholders have access to it. It is unclear if the amended law will require all central government contracting authorities and municipalities to publish their contracts on the e-procurement system. According to Balkan Tender Watch, the amendments would place the PPRC within the Ministry of Finance, thus reducing its institutional independence.<sup>24</sup> Moreover, the PRB will be transformed into a one-level body, without the right to appeal its decisions, which would have a negative effect on public procurement in Kosovo.<sup>25</sup> Due to the lack of information on the envisaged changes in the amended law, the IRM assesses the potential for results as modest.

#### **Opportunities, challenges, and recommendations during implementation**

The amendments to the Law on Public Procurement have been in development since 2020. According to a civil society representative, the amendments are on track to be approved by the parliament by the end of 2024. Since 2020, the government has repeatedly postponed the approval of the amended law.<sup>26</sup> Moreover, the government would likely also need to prepare secondary legislation for the amended law, once it is passed.

During implementation, the IRM recommends taking the following steps:

- Ensure transparent handling of complaints by the PRB. For example, Albania has created an electronic system to enable suppliers to submit complaints online and for the procurement agency to manage the process digitally and openly.<sup>27</sup>
- Make data on the e-procurement system interoperable with other databases, particularly the Kosovo Finance Information System (KFMIS) used by the Ministry of Finance, the national open data portal (Commitment 2.2), and the database planned for political finance (Commitment 4.3).

- Ensure that data published through the e-procurement system adheres to the Open Contracting Data Standard (OCDS). Kosovo could also work with the Infrastructure Transparency Initiative (CoST) and the Open Contracting Partnership (OCP) to adopt the Open Contracting for Infrastructure Data Standard, which establishes best practices in open data and data disclosure in infrastructure-related public procurement.<sup>28</sup>
- Disclose the beneficial ownership for companies who receive public procurement contracts.

**Commitment 4.3: Increasing transparency, accountability, and financial control of political parties registered in the Republic of Kosovo**

(Prime Minister's Office, Central Election Commission, Office for Registration of Political Parties and Certification, Anti-Corruption Agency)

For a complete description of this commitment, see Commitment 4.1 in the action plan [here](#).

**Context and objectives**

This commitment aims to increase the transparency, accountability, and financial control of political parties. Kosovo's legislation is mostly in line with relevant EU, OSCE, and Council of Europe standards, but there is weak oversight of political party financing.<sup>29</sup> Around €4 million in public funding is allocated to political parties annually in Kosovo, in addition to direct financing from citizens and legal entities. The legal framework for these transactions consists of the Law on Financing of the Political Parties (LFPP) and the Law on General Elections (LGE). The grounds for issuing fines are poorly defined and penalties are "exceptionally low" and do not prohibit the use of cash.<sup>30</sup> Amendments to the LFPP in 2022 gave the Office for Registration, Certification and Financial Control of Political Entities a mandate to monitor the political parties' finances ad hoc and annually through independent audit reports. According to Transparency International (TI), auditors consistently highlight widespread issues in political party finances, including inadequate accounting practices, insufficient tendering procedures, non-compliance with tax obligations, lack of internal control measures, and a lack of accounting knowledge among financial officers.<sup>31</sup> TI also notes that delays in audit processes of three to four years often prevent the publication of reports within legal deadlines. The latter was changed in the 2022 amendments to the LFPP, allowing reports to be published within the legal deadlines, regardless of whether they had been audited. The reports are only available as scanned PDF files. CSOs like FOL Lëvizja (FOL Movement) have advocated for further improvements such as a ban on the use of cash.<sup>32</sup>

Although the 2022 amendments to the LFPP were in line with the Venice Commission's Opinion, there are ongoing challenges in complying with the law in the transparent financing of parties and campaigns. TI reports that inaccurate reporting often goes unsanctioned by the Office for Financial Control, due to lack of resources and staff in the Office.<sup>33</sup> Additionally, the Kosovo Law Institute reported in 2024 that most political entities do not have internal financial control rules, and many sources of income and expenses go unreported.<sup>34</sup>

The commitment was identified through the co-creation process with inputs from TI Kosovo and other NGOs in the NCC.<sup>35</sup> However, the commitment was initially excluded in the draft action plan due to the pending amendments to the LFPP in 2022.<sup>36</sup> This decision was revisited in mid-2023 when it became apparent that the new law did not comprehensively address the issues related to the publication of political party financial reports. The point of contact to OGP shared



with the NCC the final draft of the action plan prior to its submission to the Government of the Republic of Kosovo for approval, which included this commitment.<sup>37</sup>

The milestones envision the publication of political party revenue and expenditure in open data format in a new online platform, monitoring this data during the 2025 election cycle at the central and local level, and carrying out an advocacy campaign with the involvement of civil society and media to report potential misuse of political financing. The commitment addresses the OGP value of transparency, as the online platform will make data on the political party finances more accessible to the public.

**Potential for Results: Modest**

This commitment could improve the transparency of political party finances if political parties produce more complete documentation and upload it to the platform. The Office for Registration, Certification and Financial Control of Political Entities, as well as NGOs and the public, could use the platform to identify irregularities that indicate possible fraud or abuse, such as the use of political donations from illicit financial flows. Surveys conducted by the Western Balkans Security Barometer in 2022 found that political parties are among the least trusted institutions among the public in Kosovo.<sup>38</sup> Transparent political financing could increase public trust in government institutions and in the outcomes of elections in Kosovo, such as the February 2025 parliamentary elections. There are direct links to Commitment 4.1 on public procurement to prevent contracts from, for example, being directed towards politically connected companies, and, at a broader level, to the commitments on open data (Commitments 2.1-2.4). The commitment addresses the weak legal framework through another amendment and putting in place mechanisms that would strengthen oversight.

A civil society representative noted that the publication of information in open data format would be a significant improvement to the previous practice of political parties submitting their financial reports to the Central Election Commission (CEC) as scanned PDFs.<sup>39</sup> Political parties in Kosovo include in their reports the names of donors, donation amounts, the dates of donation, assets and liabilities, in-kind donations, and individual expenses (those above €5,000).<sup>40</sup> However, the information is currently not published in a way that is suitable for bulk downloads.

Given the lack of internal processes and compliance by parties, there is a risk of continued noncompliance with existing regulations on political finance reporting, with little incentive or sanction to change behavior. While the creation of a digital platform is a positive step, it is likely to have only modest potential for results if the other issues are not addressed.

**Opportunities, challenges, and recommendations during implementation**

According to the European Commission's 2023 Progress Report, the amended LFPP lacks a requirement for interim reporting of political candidates' income and expenses during campaign periods.<sup>41</sup> In addition, the Kosova Democratic Institute notes that the law also does not clearly regulate self-financing of candidates, third party campaigning, and digital campaigning (i.e., via social networks), making these types of finances vulnerable to corruption and abuse.<sup>42</sup> When amending the legal framework for the control of political financing, Kosovo could consider regulations for the self-financing of candidates, digital campaigns, and third-party campaigns.

During implementation of this commitment, the IRM recommends taking the following steps:



- Ensure data is published on an ongoing and timely basis, including before elections (i.e., before the 2025 election cycle).
- Make political finance data interoperable with different databases for better anti-corruption monitoring. For example, linking the political finance platform to the e-procurement system could help identify when public procurement contracts are being directed towards politically connected companies.
- Consult users (i.e., researchers and journalists) to ensure data on the platform is useful.
- Create a complaint mechanism on the platform for NGOs, journalists, and the public to flag suspicious cases of political financing for investigation.
- Ensure the Office for Registration, Certification and Financial Control of Political Entities is sufficiently resourced and staffed to monitor and audit political financing reports.
- Include information on how the Office for Registration, Certification and Financial Control of Political Entities tracks enforcement actions taken against political parties, candidates, or third-party campaigners for violations of the LFPP and other political finance regulations.
- The Office for Registration, Certification and Financial Control of Political Entities could integrate the new platform into its existing trainings for political entities regarding financial reporting, calculation, and auditing.<sup>43</sup> The Office could also train members of the public, NGOs, and journalists on how to use political finance data.

## Other commitments

Other commitments that the IRM did not identify as promising commitments are discussed below. This review provides recommendations to contribute to the learning and implementation of these commitments.

Under **Commitment 1.1**, the government will add a section to the eKosova portal to digitize the process for applying for state grants and subsidies.<sup>44</sup> According to the action plan, the Government of Kosovo allocates more than €300 million each year in grants and subsidies to individuals, businesses, and NGOs. The United States Agency for International Development (USAID)'s CSO Sustainability Index has noted that these processes are generally not transparent and NGOs that are critical of government policies and decisions rarely apply for public funding.<sup>45</sup> The new section on eKosova would allow users to apply for grants online. It would also provide public information on the implementation of awarded grants and subsidies, information on the beneficiaries of each call for grants and subsidies, and evaluation reports. To ensure a competitive and transparent distribution of funding, the IRM recommends training not only public officials but also NGOs on how to apply and on providing the required information for awarded grants and subsidies. Also, the IRM recommends creating unified standards of monitoring and reporting, with the input of CSOs and international organizations, for better transparency and effectiveness of the funds spent.

Under **Commitment 1.2**, the Ministry of Local Government Administration (MLGA) aims to integrate a module called eMunicipalities on eKosova with 50 municipal services. The module will also provide real-time access to municipal budgets and revenues, open and interactive data, open contracting, urban plans, construction permits, and information on the process of assessing the legality of municipal acts. Interviewed civil society and government stakeholders believe this commitment could help address pervasive corruption at the local level. According to a 2022 study by the GAP Institute for Advanced Studies, out of the 38 municipalities in Kosovo,

only 15 published all required budget-related documents.<sup>46</sup> This commitment could increase public access to municipal budget information, if all municipalities publish budget information to eMunicipalities.

The MLGA launched eMunicipalities in May 2024 and is currently in its third phase of implementation. So far, it has the following services: live broadcasts of municipal assembly meetings, reporting problems to municipalities, communicating with municipal officials, initiating and contributing to public debates about policies in municipalities, and information on the wealth of municipal officials.<sup>47</sup> During the remainder of the implementation period, the IRM recommends publishing budget information in open data format. The MLGA could look to examples from other countries regarding fiscal transparency for local governments. For example, Lithuania has a portal where municipalities publish data related to state and local revenue and expenses, debts, and unemployment.<sup>48</sup> Additionally, Estonia has a budget data portal that includes monthly reports on the spending and accounting information of municipalities, and both state and municipal-owned agencies and companies.<sup>49</sup>

For **Commitment 1.3**, the Ministry of Agriculture, Forestry and Rural Development aims to develop an online system for citizens to report and assess damages from natural disasters. Once launched, the IRM recommends carrying out awareness raising to promote the system, particularly among the target demographic (i.e., farmers).

**Commitments 2.1, 2.2, 2.3, and 2.4** address open data. As of June 2024, Kosovo's open data portal contains 205 datasets from 14 organizations.<sup>50</sup> Kosovo approved the International Open Data Charter (ODC) in 2016 but has made limited progress in implementing the ODC principles.<sup>51</sup> Commitment 2.1 aims to establish a National Strategic Council to oversee implementation of the ODC and an inter-institutional working group within the government to coordinate implementation of the ODC.<sup>52</sup> Commitment 2.2 aims to increase the number of datasets on the open data portal by 30 percent. Commitments 2.3 and 2.4 aim to provide technical assistance to public officials in charge of publishing open data and raise awareness of civil servants on open data. These commitments could provide the foundations for increasing the amount of data published to the portal and could align Kosovo closer to the EU *acquis* on open data and the re-use of public sector information.<sup>53</sup> However, they lack clarity on the anticipated changes to open data practices. For example, Commitment 2.1 does not provide details on the role of the National Strategic Council in overseeing the ODC principles, and Commitment 2.2 does not mention the categories of data that will be added to the portal. During implementation, the IRM recommends the following steps:

- Agree on a mandate and working procedures for the National Strategic Council that defines its role in monitoring implementation of the ODC.
- Consult data users in determining which datasets to publish for Commitment 2.2.
- Add a feedback page on the open data portal for users to propose new datasets for publication and report missing or incomplete datasets.
- Publish data disaggregated by gender and geography that is also interoperable between levels of government, and across government agencies.
- Provide technical support to municipalities to publish their data to the open data portal and encourage adoption of the ODC principles by municipal governments.
- Prioritize datasets labeled "high-value" in the EU's 2019 Open Data Directive.<sup>54</sup>

- Prioritize datasets for anti-corruption monitoring that are connected to other commitments in the action plan, such as public procurement (Commitment 4.1) and political financing (Commitment 4.3).

**Commitment 3.1** aims to improve the capacity of public officials to consult the public in decision-making processes at the national and municipal levels. It involves assisting public officials on how to follow existing regulations on consultations, promoting existing government platforms for public consultations, and engaging young people in decision-making. Kosovo lacks a tradition of direct engagement in decision-making processes, despite a legal obligation of public institutions to include citizens.<sup>55</sup> A platform for consultations exists but it is underutilized and does not facilitate engagement.<sup>56</sup> The commitment does not define the mechanisms for participation, so the results may not be attributed to the implementation of the commitment's milestones. During implementation, the IRM recommends using different engagement methods for different policy areas, such as participatory budgeting (particularly at the municipal level). The government could also develop a strategy on how to reach underrepresented groups for their participation in decision-making processes.

**Commitment 3.2** focuses on preventing the proliferation of strategic lawsuits against public participation (SLAPPs).<sup>57</sup> SLAPPs are a growing problem in Kosovo.<sup>58</sup> This commitment calls for transposing the 2024 EU Anti-SLAPP Directive,<sup>59</sup> holding roundtables and conferences on SLAPPs, and supporting civil society in anti-SLAPP campaigns. As this commitment aims to support freedom of speech and media freedom, it is relevant to civic participation. The Directive requires EU member states to provide annual statistical data on SLAPP cases (e.g., the number of SLAPPs, the number of court proceedings classified by type of defendant and of claimant, and the type of claim submitted). It also requires introducing proportionate and dissuasive penalties for SLAPP initiators and legal provisions that allow courts and tribunals to dismiss SLAPPs at the earliest possible stage in the legal proceedings, in accordance with national law. Kosovo could also consider measures to enable the recovery of legal costs incurred by defendants who face SLAPPs.

**Commitment 3.3** aims to create mechanisms for citizens to submit feedback to public institutions. The commitment does not define the specifications of the feedback mechanism but mentions the possibility of a mobile application. The IRM recommends taking measures to encourage public institutions to respond to feedback in their work, including remedial actions.

**Commitment 4.2** aims to increase the transparency of the recruitment of high-level officials.<sup>60</sup> It entails publishing guidelines for recruitment procedures, launching an online platform for the recruitment of high-level officials, and publishing the minutes of candidate interviews. The competences of the Agency for Prevention of Corruption include, among others, the prevention of conflicts of interest in the civil service. A study by the Balkans Policy Research Group found that the recruitment and promotion processes for public-sector positions in Kosovo are highly politicized, with party loyalty often prioritized over professional capacity.<sup>61</sup> The European Commission's 2023 Progress Report noted extensive use of acting positions in the civil service in Kosovo, especially at senior levels, as well as ineffective external recruitment procedures for senior management.<sup>62</sup> This commitment could help reduce favoritism and clientelism in the public sector by making the recruitment process more transparent and meritocratic. The IRM recommends publishing detailed information on vacancies such as the required qualifications and work experience, who can apply, the phases of the selection process, and accepted ways to

prove qualifications. The IRM also recommends ensuring that the publication of decisions on candidates by members of interview panels are easy to understand for the public.

<sup>9</sup> IMF, Republic of Kosovo, IMF Country Report No. 23/372, November 2023.

<sup>10</sup> World Bank, Public Expenditure Review, March 2023, Construction activities represented over half of private sector investment in Kosovo in 2022.

<sup>11</sup> See for example Wells, Corruption and collusion in construction: a view from the industry, 2013, <https://www.elgaronline.com/edcollchap/edcoll/9781782544401/9781782544401.00010.xml> and <https://finintegrity.org/corruption-in-construction/>

<sup>12</sup> Fidan Kajala (Point of Contact, Government of Kosovo), interview by the IRM, 23 May and 24 June 2024.

<sup>13</sup> IMF, Republic of Kosovo, IMF Country Report No. 23/380, December 2023.

<sup>14</sup> IMF, Republic of Kosovo, IMF Technical Assistance Report – Public Investment Management Assessment, IMF Country Report No. 16/100.

<sup>15</sup> The Republic of Kosovo, Public Procurement Regulatory Commission, <https://e-prokurimi.rks-gov.net/HOME/ClanakItemNew.aspx?id=327>

<sup>16</sup> Open Contracting Partnership, Setting up for success: Data and public oversight for more transparent public procurement in Kosovo, 14 December 2021, <https://www.open-contracting.org/2021/12/14/setting-up-for-success-data-and-public-oversight-for-more-transparent-public-procurement-in-kosovo/>

<sup>17</sup> Open Contracting Partnership, Setting up for success: Data and public oversight for more transparent public procurement in Kosovo, 14 December 2021, <https://www.open-contracting.org/2021/12/14/setting-up-for-success-data-and-public-oversight-for-more-transparent-public-procurement-in-kosovo/>

<sup>18</sup> European Commission, Kosovo 2023 Report, p 72, [https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3\\_en?filename=SWD\\_2023\\_692%20Kosovo%20report\\_0.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3_en?filename=SWD_2023_692%20Kosovo%20report_0.pdf)

<sup>19</sup> Blerta Thaçi (Open Data Kosovo), interview by the IRM, 23 May 2024.

<sup>20</sup> Unca Coalition, Civil society report, p 9, <https://uncaccoalition.org/wp-content/uploads/FINAL-Kosovo-parallel-report-on-UNCAC-implementation-Kosovo-Law-Institute-UNCAC-Coalition-22-August-2024-1.pdf>

<sup>21</sup> Unca Coalition, Civil society report, p 45, <https://uncaccoalition.org/wp-content/uploads/FINAL-Kosovo-parallel-report-on-UNCAC-implementation-Kosovo-Law-Institute-UNCAC-Coalition-22-August-2024-1.pdf>

<sup>22</sup> European Commission, Kosovo 2023 Report, p 27, [https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3\\_en?filename=SWD\\_2023\\_692%20Kosovo%20report\\_0.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3_en?filename=SWD_2023_692%20Kosovo%20report_0.pdf)

<sup>23</sup> Fidan Kajala (Point of Contact, Government of Kosovo), correspondence with the IRM, 30 July 2024.

<sup>24</sup> See Balkan Tender Watch, Shadow report on public procurement in Kosovo 2023, <https://balkantenderwatch.eu/local/uploaded/BIH%20local/Shadow%20report%20KOS%20web.pdf>

<sup>25</sup> Balkan Tender Watch, Shadow report on public procurement in Kosovo 2023, <https://balkantenderwatch.eu/local/uploaded/BIH%20local/Shadow%20report%20KOS%20web.pdf>

<sup>26</sup> Unca Coalition, Civil society report, p 9, <https://uncaccoalition.org/wp-content/uploads/FINAL-Kosovo-parallel-report-on-UNCAC-implementation-Kosovo-Law-Institute-UNCAC-Coalition-22-August-2024-1.pdf>

<sup>27</sup> Open Contracting Partnership, How Albania's e-complaints system reduces red tape for government suppliers, 22 November 2022, <https://www.open-contracting.org/2022/11/22/how-albanias-e-complaints-system-reduces-red-tape-for-government-suppliers/>

<sup>28</sup> CoST the Infrastructure Transparency Initiative, OC4IDS – a new standard for infrastructure transparency, 16 April 2019, <https://infrastructuretransparency.org/resource/oc4ids-a-new-standard-for-infrastructure-transparency/>

<sup>29</sup> Zvekić, U, Roksandić, S. and Dobovšek, B, Organized Corruption = Political financing in the Western Balkans, Global Initiative Against Transnational Crime, June 2023.

<sup>30</sup> Ibid; Burbuqe Kastrati and Mexhide Demolli (FOL), interview by the IRM, 24 June 2024.

<sup>31</sup> Transparency International, Between anti-corruption reform and decline, 2024, [https://images.transparencycdn.org/images/2024\\_NISReport\\_BetweenAnti-CorruptionReformAndDecline\\_English.pdf](https://images.transparencycdn.org/images/2024_NISReport_BetweenAnti-CorruptionReformAndDecline_English.pdf)

<sup>32</sup> Ibid; Burbuqe Kastrati and Mexhide Demolli (FOL), interview by the IRM, 24 June 2024.

<sup>33</sup> Transparency International, Between anti-corruption reform and decline, p 36, [https://images.transparencycdn.org/images/2024\\_NISReport\\_BetweenAnti-CorruptionReformAndDecline\\_English.pdf](https://images.transparencycdn.org/images/2024_NISReport_BetweenAnti-CorruptionReformAndDecline_English.pdf)

<sup>34</sup> Unca Coalition, Civil society report, p 31, <https://uncaccoalition.org/wp-content/uploads/FINAL-Kosovo-parallel-report-on-UNCAC-implementation-Kosovo-Law-Institute-UNCAC-Coalition-22-August-2024-1.pdf>

<sup>35</sup> Fidan Kajala (Point of Contact, Government of Kosovo), interview by the IRM, 23 May and 24 June 2024.

<sup>36</sup> The earlier draft included a commitment on: Increasing the transparency of the judicial and prosecutorial system (Burbuqe Kastrati and Mexhide Demolli (FOL), interview by the IRM, 24 June 2024).

<sup>37</sup> Fidan Kajala (POC), correspondence with the IRM, 25 June 2024.

- <sup>38</sup> WBSB, Public perception on trust, corruption, and integrity of public institutions in Kosovo, 2022, [https://qkss.org/images/uploads/files/WBSB\\_2022\\_Kosovo\\_Report\\_1\\_Dec\\_2022\\_ENG.pdf](https://qkss.org/images/uploads/files/WBSB_2022_Kosovo_Report_1_Dec_2022_ENG.pdf)
- <sup>39</sup> Burbuqe Kastrati (FOL), correspondence with the IRM, 31 July 2024.
- <sup>40</sup> Transparency International, Bringing the receipts, p 24, [https://images.transparencycdn.org/images/2023\\_WorkingPaper\\_BringingTheReceipts\\_English.pdf](https://images.transparencycdn.org/images/2023_WorkingPaper_BringingTheReceipts_English.pdf)
- <sup>41</sup> European Commission, Kosovo 2023 report, p 29, [https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3\\_en?filename=SWD\\_2023\\_692%20Kosovo%20report\\_0.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3_en?filename=SWD_2023_692%20Kosovo%20report_0.pdf)
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- <sup>44</sup> The government launched eKosova, a national portal for digital services, in 2016, <https://ekosova.rks-gov.net/>
- <sup>45</sup> 2020 Civil Society Organization Sustainability Index, Kosovo, September 2021, p 8, <https://storage.googleapis.com/cso-si-dashboard.appspot.com/Reports/CSOSI-Kosovo-2020.pdf>
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- <sup>47</sup> Prime Minister Office, The e-Komuna platform is launched, 17 May 2024, <https://kryeministri.rks-gov.net/en/blog/the-e-komuna-platform-is-launched-it-facilitates-citizens-access-to-municipal-services/>
- <sup>48</sup> Open Lithuanian Finance, State, municipal and fund budgets, <https://lietuvosfinansai.lt/en/lithuanian-finance-2/>
- <sup>49</sup> <https://saldo.rtk.ee/saldo-app/aruanded?search=%257B%2522code%2522:null,%2522name%2522:null,%2522year%2522:21,%2522period%2522:%252212%2522,%2522lastUsedPartnerNameSearch%2522:%2522%2522%257D>
- <sup>50</sup> Republic of Kosovo, Open data, according to the last update from June 2024, <https://web.archive.org/web/20240608223147/https://opendata.rks-gov.net/dataset>
- <sup>51</sup> Fidan Kajala (Point of Contact, Government of Kosovo), Blerta Thaçi (Executive Director, Open Data Kosovo), interview by the IRM, 23 May 2024; Burbuqe Kastrati and Mexhide Demolli (FOL), interview by the IRM, 24 June 2024; and Open Data Kosovo, Towards Open Government Kosovo, 31 May 2021, <https://opendatakosovo.medium.com/towards-open-government-kosovo-57f295f9675a>
- <sup>52</sup> See ODC, <https://opendatacharter.org/government-adopters/>. The International ODC is an international organization for collaboration between governments and organizations, working to open data based on a shared set of six principles: 1) open by default, 2) timely and comprehensive, 3) accessible and usable, 4) comparable and interoperable, 5) for improved governance and citizen engagement, and 6) for inclusive development and innovation.
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- <sup>60</sup> Burbuqe Kastrati and Mexhide Demolli (FOL), interview by the IRM, 24 June 2024.
- <sup>61</sup> Balkans Policy Research Group, Public administration reform in Kosovo: Constant struggle to make it, 2020, <https://balkansgroup.org/en/public-administration-reform-in-kosovo-constant-struggle-to-make-it/>
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## Section III. Methodology and IRM Indicators

The purpose of this review is not an evaluation. It is intended as a quick, independent, technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process. The IRM highlights commitments that have the highest potential for results, a high priority for country stakeholders, a priority in the national open government context, or a combination of these factors.

The three IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges IRM identifies to inform a stronger implementation process.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In the Action Plan Review, the IRM follows a filtering and clustering process to identify promising reforms or commitments:

**Step 1:** Determine what is reviewable based on the verifiability of the commitment as written in the action plan.

**Step 2:** Determine if the commitment has an open government lens. Is it relevant to OGP values?

**Step 3:** Review commitments that are verifiable and have an open government lens to identify if certain commitments need to be clustered. Commitments that have a common policy objective or contribute to the same reform or policy issue should be clustered. The potential for results of clustered commitments should be reviewed as a whole. IRM staff follow these steps to cluster commitments:

- a. Determine overarching themes. If the action plan is not already grouped by themes, IRM staff may use OGP's thematic tagging as reference.
- b. Review commitment objectives to identify commitments that address the same policy issue or contribute to the same broader policy or government reform.
- c. Organize commitments into clusters as needed. Commitments may already be organized in the action plan under specific policy or government reforms.

**Step 4:** Assess the potential for results of the clustered or standalone commitment.

Filtering is an internal process. Data for individual commitments is available in Annex 1. In addition, during the internal review process of this product, the IRM verifies the accuracy of findings and collects further input through peer review, OGP Support Unit feedback as needed, interviews and validation with country stakeholders, an external expert review, and oversight by IRM's International Experts Panel (IEP).

As described earlier, IRM relies on **three key indicators** for this review:

### I. Verifiability

- **Yes, specific enough to review:** As written in the action plan, the stated objectives and proposed actions are sufficiently clear and include objectively verifiable activities to assess implementation.
- **No, not specific enough to review:** As written in the action plan, the stated objectives and proposed actions lack clarity and do not include explicitly verifiable activities to assess implementation.
- Commitments that are not verifiable will be considered not reviewable, and further assessment will not be carried out.

## II. Open government lens

This indicator determines if the commitment relates to the open government values of transparency, civic participation, or public accountability as defined by the Open Government Declaration and the OGP Articles of Governance by responding to the following guiding questions. Based on a close reading of the commitment text, the IRM first determines whether the commitment has an open government lens:

- **Yes/No:** Does the commitment set out to make a policy area, institution, or decision-making process more transparent, participatory, or accountable to the public?

The IRM uses the OGP values as defined in the Articles of Governance. In addition, the following questions for each OGP value may be used as a reference to identify the specific open government lens in commitment analysis:

- **Transparency:** Will the government disclose more information, improve the legal or institutional frameworks to guarantee the right to information, improve the quality of the information disclosed to the public, or improve the transparency of government decision-making processes or institutions?
- **Civic Participation:** Will the government create or improve opportunities, processes, or mechanisms for the public to inform or influence decisions? Will the government create, enable, or improve participatory mechanisms for minorities or underrepresented groups? Will the government enable a legal environment to guarantee freedoms of assembly, association, and peaceful protest?
- **Public Accountability:** Will the government create or improve opportunities to hold officials answerable for their actions? Will the government enable legal, policy, or institutional frameworks to foster accountability of public officials?

## III. Potential for results

The IRM adjusted this indicator—formerly known as the “potential impact” indicator—to take into account the feedback from the IRM Refresh consultation process with the OGP community. With the new results-oriented strategic focus of IRM products, the IRM modified this indicator to lay out the expected results and potential that would be verified in the IRM Results Report after implementation. Given the purpose of this Action Plan Review, the assessment of potential for results is only an early indication of the possibility the commitment has to yield meaningful results based on its articulation in the action plan in contrast with the state of play in the respective policy area.

The scale of the indicator is defined as:



- **Unclear:** The commitment is aimed at continuing ongoing practices in line with existing legislation, requirements, or policies without indication of the added value or enhanced open government approach in contrast with existing practice.
- **Modest:** A positive but standalone initiative or change to processes, practices, or policies. The commitment does not generate binding or institutionalized changes across government or institutions that govern a policy area. Examples are tools (e.g., websites) or data release, training, or pilot projects.
- **Substantial:** A possible game changer for practices, policies, or institutions that govern a policy area, public sector, or the relationship between citizens and state. The commitment generates binding and institutionalized changes across government.

This review was prepared by the IRM and was reviewed by Brendan Halloran, IRM external expert. The IRM methodology, quality of IRM products, and review process are overseen by IRM's IEP. For more information, see the IRM Overview section of the OGP website.<sup>63</sup>

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<sup>63</sup> IRM Overview: <https://www.opengovpartnership.org/irm-guidance-overview/>

## Annex 1. Commitment by Commitment Data<sup>64</sup>

### **Commitment 1.1: E-services web portal for Kosovo (eKosova)**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

### **Commitment 1.2: Integrate new module (eMunicipalities) within eKosova in order to digitize all municipal services**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

### **Commitment 1.3: Online system for reporting and assessing damages from natural disasters**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest

### **Commitment 2.1: Publication of government data through Open Data Portal**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest
- This commitment has been clustered as Open Data (Commitments 2.1-2.4 of the action plan)

### **Commitment 2.2: Increase the number of databases published on the Open Data Portal by 30%**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest
- This commitment has been clustered as Open Data (Commitment 2.1 and 2.2 of the action plan)

### **Commitment 2.3: Provide (technical) assistance to public officials on publication of data**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest
- This commitment has been clustered as Open Data (Commitments 2.1-2.4 of the action plan)

### **Commitment 2.4: Raise awareness about the importance of open data**

- Verifiable: Yes
- Does it have an open government lens? Yes
- Potential for results: Modest
- This commitment has been clustered as Open Data (Commitments 2.1-2.4 of the action plan)

### **Commitment 3.1: Improving existing platforms for citizen participation in decision-making**

- Verifiable: Yes
- Does it have an open government lens? Yes

<ul style="list-style-type: none"> <li>• Potential for results: Modest</li> </ul>
<b>Commitment 3.2: Campaigns to prevent the proliferation of strategic lawsuits against public participation (SLAPPs)</b>
<ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<b>Commitment 3.3: Mechanisms for citizens' complaints on public services</b>
<ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Unclear</li> </ul>
<b>Commitment 4.1: Fully open public procurement system</b>
<ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<b>Commitment 4.2: Transparent recruitment of high-level officials</b>
<ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>
<b>Commitment 4.3: Increasing transparency, accountability, and financial control of political parties registered in the Republic of Kosovo</b>
<ul style="list-style-type: none"> <li>• Verifiable: Yes</li> <li>• Does it have an open government lens? Yes</li> <li>• Potential for results: Modest</li> </ul>

<sup>64</sup> **Editorial notes:**

1. For commitments that are clustered, the assessment of potential for results is conducted at the cluster level, rather than the individual commitments.
2. Commitment short titles may have been edited for brevity. For the complete text of commitments, please see Kosovo's action plan: <https://www.opengovpartnership.org/documents/kosovo-action-plan-2023-2025-december/>

## Annex 2: Action Plan Co-Creation

OGP member countries are encouraged to aim for the full ambition of the OGP Participation and Co-Creation Standards that came into force on 1 January 2022.<sup>65</sup> The IRM assesses all countries that submitted action plans from 2022 onward under the updated standards. Table 2 outlines the extent to which the countries' participation and co-creation practices meet the minimum requirements that apply during development of the action plan.

OGP instituted a 24-month grace period to ensure a fair and transparent transition to the updated standards. Action plans co-created and submitted by 31 December 2023 fall within the grace period. The IRM will assess countries' alignment with the standards and their minimum requirements.<sup>66</sup> However, countries will only be found to be acting contrary to process if they do not meet the minimum requirements for action plans co-created in 2024 and onwards.

Please note that, according to the OGP National Handbook, countries implementing four-year action plans must undertake a refresh process at the two-year mark. Countries are expected to meet minimum requirements 3.1 and 4.1 during the refresh process.<sup>67</sup> IRM assessment of the refresh process will be included in the Results Report.

**Table 2. Compliance with minimum requirements**

Minimum requirement	Met during co-creation?	Met during implementation?
<b>1.1 Space for dialogue:</b> Kosovo's multi-stakeholder forum, the National Coordination Committee (NCC), was founded in July 2021. The NCC is composed of 17 civil society representatives and 12 government representatives. The umbrella network of CSOs in Kosovo, Civikos, facilitated the selection of civil society members and invited organizations that were not under this umbrella. <sup>68</sup> The NCC held 11 meetings, including seven public discussions in regions of Kosovo and four thematic workshops. <sup>69</sup> The regional meetings took place in the municipalities of Pristina, Prizren, Peja, Ferizaj, Gjiilan, Southern Mitrovica, and Gjakova. <sup>70</sup>	Yes	<i>To be assessed in the Results Report</i>
<b>2.1 OGP website:</b> There is a publicly accessible website that contains the latest action plan and information on the OGP process. <sup>71</sup>	Yes	<i>To be assessed in the Results Report</i>
<b>2.2 Repository:</b> The "Documents" section of the OGP website contains the 2023-2025 action plan, a booklet for the action plan, Kosovo's Letter of Intent to join OGP, and Kosovo's score for OGP's eligibility criteria. The "News" section contains readouts from NCC meetings and consultations for the action plan. As of December 2023, when the action plan was adopted, the last update to this section was from 26 July 2022. <sup>72</sup> Standard 2 of OGP's Co-creation and Participation requirement requires OGP members to maintain and regularly update (at least twice a year) a publicly available document repository which provides access to documents related to the OGP process, including information and evidence of the co-creation process and of the implementation of commitments. According to the point of contact, minutes of the meetings were distributed to members of the NCC alongside other materials. <sup>73</sup> However, it is not possible for the IRM to identify examples	No	<i>To be assessed in the Results Report</i>

of these minutes. According to the vice-chairperson of the NCC, the co-creation process involved joint editing of a shared Google Drive, but this Drive is no longer available. <sup>74</sup>		
<b>3.1 Advanced notice:</b> According to the point of contact, invitations, agendas, and materials for each NCC meeting were sent to participants three weeks in advance. The point of contact emailed participants twice, a week before each meeting, and again one day before each meeting. <sup>75</sup> However, it has not been possible to see these emails. The core part of the co-creation process ran for two months in March-April 2022. The only announcement of this process is a publication on the OGP website after the first meeting had taken place on 8 March 2022. <sup>76</sup> There is no evidence that a timeline of the co-creation process with an overview of opportunities for stakeholders to participate was shared on the OGP website at least two weeks before the start of the co-creation process, as required by Standard 3 of OGP's Co-creation and Participation (although the NCC was formed before these standards took effect).	No	Not applicable
<b>3.2 Outreach:</b> In addition to the 11 working NCC meetings, outreach was carried out in the seven regional public discussions, bringing together representatives of key state institutions, civil society, media, and interested citizens to discuss the key topics of the draft action plan: anti-corruption, digital governance, data openness, and citizen participation in decision-making. In addition, four workshops were held to gather input from experts on the thematic areas of the action plan. <sup>77</sup>	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> In addition to the in-person workshops and regional dialogues, the draft action plan was uploaded to the government's consultation portal for 60 days for citizens to provide feedback. The action plan has identified this platform as having room for improvement partly because it does not have a function for providing comments (comments have to be provided by email). <sup>78</sup>	Yes	Not applicable
<b>4.1 Reasoned response:</b> The point of contact responded to all emails received on a case-by-case basis to all stakeholders, but these emails are not recoverable and hence cannot be evidenced. <sup>79</sup>	No	Not applicable
<b>5.1 Open implementation:</b> The IRM will assess whether meetings were held with civil society stakeholders to present implementation results and enable civil society to provide comments in the Results Report.	Not applicable	<i>To be assessed in the Results Report</i>

<sup>65</sup> 2021 OGP Participation and Co-Creation Standards: <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>

<sup>66</sup> IRM Guidelines for the Assessment of Minimum Requirements: <https://www.opengovpartnership.org/documents/irm-guidelines-for-the-assessment-of-minimum-requirements/>

<sup>67</sup> OGP National Handbook 2022, Section 2.3: <https://www.opengovpartnership.org/documents/ogp-national-handbook-rules-and-guidance-for-participants-2022/>

<sup>68</sup> Fidan Kajala (POC), interview and correspondence with the IRM

<sup>69</sup> Kosovo National Action Plan 2023-2025, p 7

<sup>70</sup> Vice-chairperson of the NCC, interview by the IRM, June 2024; Open Government Partnership Kosovo, <https://ogpkosova.org/>

<sup>71</sup> Open Government Partnership Kosovo, <https://ogpkosova.org/>

<sup>72</sup> Open Government Partnership Kosovo, Open consultation of the National Action Plan draft 2023-2025 for OGP Kosovo, <https://ogpkosova.org/news5>

<sup>73</sup> Fidan Kajala (POC), correspondence with the IRM, June 2024.

<sup>74</sup> Fidan Kajala (POC) and vice-chairperson of the NCC, interview by the IRM, June 2024.

<sup>75</sup> Fidan Kajala (POC), correspondence with the IRM, June 2024.

<sup>76</sup> Open Government Partnership Kosovo, Public debate on the Open Government Partnership in the Municipality of Prishtina, March 2022, <https://ogpkosova.org/news4>

<sup>77</sup> Fidan Kajala (POC), correspondence with the IRM, June 2024.

<sup>78</sup> Fidan Kajala (POC), interview by the IRM, June 2024.

<sup>79</sup> Fidan Kajala (POC), interview and correspondence with the IRM, June 2024.