



**Open Government Partnership  
Montenegro**

**National Action Plan for the Implementation of the Initiative  
Open Government Partnership in Montenegro  
2026 - 2029.**

12 Oct, 2025

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## Introduction

Montenegro has been a member of the global Open Government Partnership (POU/OGP) initiative since 2012, reaffirming its commitment to the principles of transparency, accountability and citizen participation in decision-making processes. OGP is a global platform that brings together governments and civil society organizations with the aim of improving openness, fighting corruption and strengthening citizens' trust in institutions through inclusive policy-making processes and modernization of public administration.

During previous cycles, Montenegro's National Action Plans (NAPs) included measures aimed at improving transparency, access to information, public participation, fiscal accountability and strengthening the integrity of public administration. These activities were aligned with national strategic documents, including the Public Administration Reform Strategy 2022-2026, the Strategy for Cooperation between Public Administration Bodies and Non-Governmental Organizations 2022-2026, and the Digital Transformation Strategy 2022-2026, as well as other relevant policies.

Montenegro's participation in the OGP initiative is of particular importance in the context of European integration and public administration reform. Montenegro is committed to the EU reform agenda, which is essential for Montenegro's progress on the EU path. The OGP initiative provides space for additional impetus to reforms and modernization of public administration at both the state and local levels, in line with the needs of citizens, business, academia and NGOs, who are looking for a credible, independent and effective institutional response. In fact, the implementation of the OGP obligations directly contributes to the fulfilment of the requirements of the EU accession process, especially in the areas of the rule of law, the fight against corruption and the building of inclusive institutions. The OGP process is recognized as an important instrument for improving transparency, accountability and efficiency of the public sector, but also for strengthening citizens' trust in institutions. Through the previous cycles of the National Action Plans (NAPs), Montenegro has implemented a number of measures aimed at:

- Improving access to information,
- strengthening the participation of citizens and civil society,
- development of open data and digitalisation of public services;
- fight against corruption and strengthening the integrity of public administration,
- Improving cooperation with local communities and international partners.

While some results have been achieved, previous reports point to challenges in implementation, in particular in terms of political stability, inter-institutional cooperation and continued involvement of civil society. Problems such as the limited implementation of certain obligations, uneven application of e-participation mechanisms and open data, as well as the need to strengthen institutional resilience to digital threats and crisis situations were particularly highlighted.

The new National Action Plan for the period 2026-2029 seeks to respond to these challenges, relying on the lessons learned from previous cycles and the recommendations of the Independent Reporting Mechanism (IRM), as well as the guidelines of the OGP for the development of action plans. The planned reform steps will focus on:

- Further institutionalization and improvement of public participation mechanisms,
- proactive transparency and availability of valuable data sets;
- Strengthening integrity and accountability at all levels of government.
- Promoting cooperation with civil society and local communities,
- strengthening the digital resilience and security of the public administration.

By implementing the Action Plan, Montenegro confirms its commitment to the principles of open government and European values, with the aim of building effective, accountable and inclusive institutions, strengthening citizens' trust and accelerating reform processes in line with the 2030 Agenda for Sustainable Development<sup>1</sup>.

## Results and challenges so far in the implementation of the Open Government Partnership initiative in Montenegro

The analysis of the implementation of previous NAPs shows that certain progress has been made in improving the transparency and openness of the Government's work, developing open data portals, strengthening mechanisms for involving citizens in decision-making processes and improving cooperation with civil society. It is particularly important to highlight the progress in publishing information on the work of the Government, the availability of materials from the sessions, as well as the inclusion of the first municipalities in the OGP Local initiative (Bar, Plav, Žabljak).

However, reports from the Independent Reporting Mechanism (IRM), as well as evaluations by domestic and international partners, have pointed to a number of other challenges:

- Limited implementation of certain obligations, especially in the area of e-participation and open data,
- Uneven application of proactive transparency mechanisms at all levels of government,
- Insufficient involvement of civil society, especially in the implementation phase,

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<sup>1</sup> [National Strategy for Sustainable Development until 2030](#)

- Problems with inter-institutional cooperation and continuity of reforms due to frequent political and personnel changes,
- Weaker institutional resilience to digital threats, as evidenced by the cyber attack of 2022, which significantly affected the functioning of public administration.

The report on the implementation of the NAP 2023-2024 indicates significant but insufficiently consistent progress in all key areas of the initiative. The specific findings and recommendations are as follows:

- Specific findings from the Report on the Implementation of the NAP 2023–2024

- Only 37% of the planned activities have been fully implemented, while 48% of the activities have been partially implemented and 15% have not been started.
- In the period 2023-2024, no comments were submitted to electronic public consultations through the eParticipation system.
- Budget transparency has improved through the publication of budget visuals and a study on whistleblowers, but the five infographics envisaged have not been produced.
- A new national [Open Data Portal has been established](#), where over 600 datasets are currently available.
- Digital management has seen the establishment of a Central GSOC Cyber Response Service, but without a formal methodology for evaluating security incidents.

- Recommendations of relevant institutions that have implemented certain measures for further improvement

- The General Secretariat of the Government proposes to amend the Rules of Procedure of the Government in order to more clearly define the competence of the Ministry of Public Administration for quality control of public hearings.
- The Community of Municipalities emphasizes the need to develop guidelines for the publication of data on the spending/distribution of local budget funds (including data on tax debt and rescheduling of municipalities).
- The Agency for Personal Data Protection and Free Access to Information recommends that local open data measures include an annual metadata revision and the renewal of data reuse APIs.

- Specific recommendations for the formation of the Operational Team

- Clearly define the mandatory roles of each member of the Operational Team, with explicit commitments for the coordination of sectoral working groups (digitalization, integrity, open data).

- Introduce mandatory quarterly meetings of the Operations Team with a fixed agenda focused on monitoring the achieved indicators and timely identification of risks.
- Increase the engagement of representatives of local governments (at least one member from each region) and NGOs (one representative for open data and civic participation) to ensure horizontal representation of all actors.
- Introduce a system of internal and external mentoring: experienced members of IRM and SIGMA mentor new members in the first six months of their mandate.

These challenges were further highlighted during the consultation processes within the drafting of the new NAP, where representatives of civil society, local governments and international partners highlighted the need to strengthen institutional capacities, improve cross-sectoral cooperation and strengthen mechanisms for citizen participation.

## The process of drafting the National Action Plan 2026–2029

The development of the National Action Plan for the period 2026-2029 takes place through an inclusive, transparent and participatory process, in accordance with OGP guidelines and international practices. The process of co-creating the NAP 2026-2029 was implemented in accordance with the defined Calendar of Consultations<sup>2</sup> published on the official website of the Ministry of Public Administration. Through public consultations conducted from February to April 2025, proposals from citizens, civil society organizations and other stakeholders were collected. The operational team, formed by the Ministry of Public Administration, includes representatives of the state administration, local governments, civil society, academia and international partners. Special attention was paid to strengthening the role of citizens and civil society organizations in all phases of the process – from proposing priorities, through validation of measures, to monitoring the implementation and evaluation of the achieved results. The operational team emphasized the importance of transparency, accountability and inclusiveness as fundamental principles of the NAP development and implementation process.

Key elements of the NAP process include:

- Public calls and online questionnaires for citizens, civil society organizations and businesses,

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<sup>2</sup> [Co-creation of the National Action Plan 2026-2029](#)

- Organization of regional workshops and public debates in the Central, Southern and Northern regions during September 2025.
- Consultations with experts in the field of digitalization, transparency, fight against corruption and civic participation,
- Regular informing of the public and publication of relevant materials on the official websites of the Ministry of Public Administration and OGP, on the website of the Open Government Partnership - Ministry of Public Administration<sup>3</sup>
- Incorporate feedback, i.e. comments and suggestions from the public consultation into the final version of the NAP.

### **Overview of the activities of the joint creation of the National Action Plan 2026-2029**

Since the launch of the process of drafting the new Open Government Partnership National Action Plan for the period 2026-2029, the Ministry of Public Administration has undertaken a number of concrete activities with the aim of ensuring inclusiveness, transparency and quality of the entire process:

#### 1. Initiating the process and forming the operating framework

- In order to obtain initial proposals and suggestions for the development of a new NAP, **preliminary consultations were conducted in February 2025**, in accordance with the Public Call<sup>4</sup>. A report was published on the conducted consultations, and the received comments and proposals were forwarded to the institutions responsible for resolving them in order to take a position on the received proposals.
- The formation of the Operational Team **of the Open Government Partnership was initiated**, one of the tasks of which will be the development of the NAP, which includes representatives of the state administration, local self-governments, civil society, academia and international partners (public call for the nomination of NGO representatives<sup>5</sup>, repeated public call for the nomination of NGO representatives<sup>6</sup>).
- A dynamic work plan with clearly defined phases, deadlines and responsibilities for all involved stakeholders (Calendar of Activities) has been adopted<sup>7</sup>.

#### 2. Consultation and public involvement

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<sup>3</sup> [Open Government Partnership - Ministry of Public Administration](#)

<sup>4</sup> [Public call for consultations of the interested public on the development of the National Action Plan](#)

<sup>5</sup> [Public Call for Nomination of NGO Representatives in the Partnership Operational Team](#)

<sup>6</sup> [Repeated Public Call for Nomination of NGO Representatives to the Operational Team](#)

<sup>7</sup> [Co-creation of the National Action Plan 2026-2029](#)

- A broad stakeholder consultation process was carried out, including public calls<sup>8</sup> and online questionnaires for citizens<sup>9</sup>, civil society organisations and businesses, with the aim of gathering proposals, suggestions and comments on the priorities and obligations of the new NAP.
- In September 2025, three regional workshops and public debates will be organized, as well as focus groups with representatives of state administration bodies, local self-governments, the NGO sector, academia and business associations.
- Citizens are regularly informed and all materials are published on the official websites of the Ministry of Public Administration and the Open Government Partnership<sup>10</sup> for the purpose of transparency and enabling feedback.

### 3. Analysis and alignment with strategic and international frameworks

- The planned and defined activities are aligned with the Public Administration Reform Strategy 2022-2026 and related action plans, as well as with the Sustainable Development Goals and obligations from the EU accession process.

### 4. Technical and expert support

- The Ministry, with the support of international partners and the engagement of external experts, provided expert and technical support to the process of drafting the new NAP, including the preparation of analytical materials and the facilitation of consultations.

### 5. Monitoring, evaluation and public reporting

- Work is underway to establish mechanisms for monitoring and evaluating the implementation of the NAP, in cooperation with the Independent Reporting Mechanism (IRM) and other relevant institutions.
- All conclusions, agreed steps and reports are publicly available, further strengthening public confidence in the reform process and results.

These activities confirm the commitment of the Ministry of Public Administration to make the process of drafting the new NAP inclusive, transparent and focused on the real needs of citizens and society, in accordance with international standards and best practices.

## **Continuity and Continuation of Reforms**

Reforms do not end with a single cycle, but are continuously improved through coordinated mechanisms, ensuring that Montenegro remains consistent with the goal of building an open, accountable and digitally resilient public administration. In order to ensure the continued

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<sup>8</sup> [A new public call for citizens' participation in the development of the National Action Plan](#)

<sup>9</sup> [Inclusion of citizens in the process of co-creation of the National Action Plan 2026-2029](#)

<sup>10</sup> [Open Government Partnership - Ministry of Public Administration](#)

continuity of the reform processes and to build on the lessons learned from previous cycles, the new Action Plan highlights the importance of:

- Compliance with the Action Plan 2025-2026 of the Public Administration Reform Strategy 2022-2026 NAP 2026-2029 builds on the objectives and measures defined in the aforementioned Action Plan of the Public Administration Reform Strategy for the period 2025-2026, especially in the areas of digital transformation and institutional capacity building.
- compliance with EU recommendations. The activities of the new NAP 2026-2029 have been created in accordance with the latest recommendations of the European Commission.
- link with the previous NAP 2023-2024 All new priorities and obligations are logistically upgraded to the implementation of the previous Action Plan 2023-2024. A key element of continuity is the analysis of unrealized activities during 2023–2024 and their transformation into new obligations or activities with clear indicators and deadlines.

## Thematic priorities and strategic framework of the new NAP

The thematic priorities of the new National Action Plan are the result of a consultation process with a wide range of stakeholders. During the development of the NAP, the Ministry of Public Administration conducted several public calls, online questionnaires and targeted meetings, which enabled the inclusion of proposals and views of citizens, non-governmental organizations, the economy, the academic community and local self-governments.

Through the public consultation, which covered the period from February to May 2025, proposals and suggestions were collected on key challenges and needs of public administration, with a special emphasis on transparency, public participation, digitalization and the fight against corruption.

By analyzing the received comments and proposals, as well as the recommendations from the reports of the Independent Reporting Mechanism (IRM) and international partners, the Open Government Partnership Operational Team has systematized and ranked five thematic areas as the foundation of the new NAP. This approach has ensured that the ultimately defined priorities reflect the voice and real needs of society to the greatest extent possible, thus ensuring the legitimacy, relevance and sustainability of the proposed measures.

The Independent Reporting Mechanism (IRM) is in the 2022-2024 report<sup>11</sup>. In particular, he pointed out the need for:

- strengthening institutional mechanisms and forums for cooperation between the Government and the civil sector throughout the implementation cycle of the plan;
- Improving digital tools and e-participation for consistent public engagement.
- strengthening cybersecurity and resilience of digital government, especially after the experience of a cyber attack in 2022,
- Improving the availability, quality and usability of open data through a functional portal and better proactive publication by institutions.

Based on the analysis of previous cycles, IRM recommendations and stakeholder consultations, the new National Action Plan focuses on the following priority areas:

1. **Citizen participation in decision-making processes**
2. **Fiscal transparency**
3. **Conference "Journalists as Partners in Fight Against Corruption"**
4. **Openness of local self-governments**
5. **Digital management**

Each area includes clearly defined commitments and activities, with measurable progress indicators, in accordance with the SMART principles (specificity, measurability, action orientation, relevance and time limitation). The planned reform steps are fully aligned with key national strategic documents, the goals of the 2030 Agenda for Sustainable Development (in particular Goal 16 – building effective, accountable and inclusive institutions), as well as with the obligations from the EU accession process.

## Role of the Operations Team, Monitoring and Evaluation

The operations team plays a key role in coordinating the development process, validating the methodology and priorities, promoting the process and animating the general public to participate. For the purpose of monitoring the implementation of measures and activities from the new National Action Plan, the formalization of the Operational Team of the Open Government

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<sup>11</sup> <https://www.opengovpartnership.org/documents/montenegro-results-report-2022-2024/>

Partnership is underway. In the coming period, the Government will appoint an Operational Team for a term of four years, and its composition consists of the Head (Minister of Public Administration), Deputy Manager (Director General of the Directorate for Transparency, Openness and Improvement of Public Administration in the Ministry of Public Administration) and up to 25 members from the ranks of the competent state administration bodies and non-governmental organizations. Professional and administrative and technical support to the work of the Operational Team is provided by the Ministry of Public Administration.

A written report on the implementation of the Action Plan shall be submitted to the Government of Montenegro at the end of each year of implementation. With the aim of improving the implementation of the Action Plan, and at the proposal of the Operational Team, the Ministry of Public Administration may, along with the Report, propose to the Government a revision of individual measures/activities, their holders and/or co-holders and associates in implementation, deadlines, necessary funds and indicators of implementation in the coming period. In accordance with the principles and standards of the global OGP initiative, a revision of the NAP 2026-2029 is carried out after two years from the adoption of the document. All state administration bodies that are holders and co-holders of the implementation of certain activities of the Action Plan are obliged to plan funds for the implementation of certain activities in the next budget period in their budget positions on time.

All minutes with conclusions after the meetings of the Open Government Partnership Operational Team are published publicly for the sake of transparency and citizen involvement on a special website. Monitoring of implementation is provided by the Government, the Ministry of Public Administration and the Independent Reporting Mechanism (IRM), with the possibility of auditing measures based on evaluation and feedback from public consultations.

## Conclusion

The National Action Plan for the Implementation of the Open Government Partnership in Montenegro 2026-2029 is an ambitious and inclusive reform framework that responds to the key challenges of openness, transparency and accountability of public administration in Montenegro. The document reaffirms its commitment to the principles of open government, transparency, accountability and participatory decision-making, and is the result of the joint work of representatives of public administration, the civil sector, academia and international partners, with a broad consultative process that has enabled the involvement of all stakeholders.

The Plan defines concrete measures and activities aimed at improving access to information, opening data, strengthening integrity and trust in institutions, openness of local self-governments, as well as empowering citizens and civil society to actively participate in the adoption and

monitoring of public policies. A special focus is placed on digital governance and innovation, ensuring that open government processes are inclusive and sustainable in the coming period.

The implementation of the Action Plan requires strong inter-institutional cooperation, continuous dialogue with civil society and adequate resources in order to fully implement the defined activities and indicators. Monitoring, reporting and evaluation will be key tools to measure progress and adjust measures in line with the real needs of society, as well as to revise the action plan in question after two years.

By implementing the National Action Plan of the Open Government Partnership, Montenegro not only fulfils its international obligations under the Open Government Partnership, but also reaffirms its commitment to European values and principles of open government, with the aim of building effective, accountable and inclusive institutions, strengthening citizens' trust and accelerating reform processes in line with international standards and the needs of society.

## OGP COMMITMENT

<b>Country</b>	Montenegro		
<b>The number and name of the obligation</b>	1. CITIZEN PARTICIPATION IN DECISION-MAKING PROCESSES		
<b>A brief description of the obligation</b>	<i>The obligation aims to increase the participation of citizens in decision-making processes, especially those directly related to the lives of citizens, in order to ensure greater transparency and accountability in the work of institutions.</i>		
<b>The Bearer of the Obligation</b>	Ministry of Public Administration, General Secretariat of the Government		
	<b>Government</b>	<b>OCD</b>	<b>Other actors</b>

<b>Supporting actors</b>	Human Resources Directorate, LGUs, and other line ministries	OT members from the NGO sector	/
<b>Implementation period</b>	2026-2029		

Defining the problem	
<p><b>1. What problem does this obligation aim to solve?</b></p> <p>The problem that this obligation seeks to address relates to the limited and insufficiently effective participation of the public in decision-making processes. Key challenges include a low level of transparency in the work of public administration, a lack of available and timely information, as well as poor communication between citizens and institutions. This situation leads to formal rather than actual citizen participation, which means that even when citizens participate in consultative processes, their influence is often minimal or non-existent. The problems are primarily reflected in the lack of awareness of citizens about the holding of public consultations and public debates. It is not enough to publish announcements only on the website of the ministries, but it is necessary for the announcements of public consultations and public debates to be published through other communication channels, social networks, media, in a way that is most accessible to the general public. The problems are also reflected in technical and organizational barriers, such as inadequate consultation times, insufficient use of available digital platforms for citizen engagement, and poor practices in responding to their comments and suggestions.</p> <p>The identified challenge affects all citizens, including different age and socio-demographic groups, with a particular focus on young people and members of national minorities, who often remain marginalized due to technical, educational and cultural barriers. These groups have more difficult access to information and less opportunity to have a real impact on decision-making processes. The problem occurs in various local communities across the country, indicating its prevalence and systemic character. The lack of transparent, timely and easily accessible information further reduces their ability to actively participate. The feeling of distance and distrust towards institutions is reinforced by the lack of response to their suggestions and the perception that their participation has no real impact.</p> <p>The defined problem has been going on for a long period of time and is the result of deep-rooted structural weaknesses in transparency, digital infrastructure, legal frameworks and the work culture of institutions. Barriers at the lowest level include difficult access to electronic information due to a lack of digital literacy and the lack of single, transparent websites, while at higher levels the challenges include uneven digitalisation of institutions, outdated procedures and poor document exchange. While significant progress has been observed in the process of opening up public administration and increasing transparency, citizen participation continues to fluctuate and barriers remain.</p> <p>The impact of the problem is continuous, as citizens have not been able to achieve full participation for a long time, which hinders the development of democratic processes and reduces trust in public institutions. A permanent solution requires a systemic and multidimensional approach that includes the adoption and implementation of clear legal frameworks on free access to information, intensive digitalization of public services, continuous education of both citizens and employees in the public sector, and the establishment of efficient channels for two-way communication and transparent data exchange.</p>	

Only through such a comprehensive approach, which includes technological, legal, educational and organisational measures, can real, inclusive and responsible citizen participation in decision-making be ensured. This strengthens the democratic capacity of society, increases trust in institutions, and builds an open and transparent public administration that respects and actively involves its citizens.

## 2. What are the causes of the problem?

An analysis of the **problem of limited and insufficiently effective participation of citizens in decision-making** using the Five Whys method indicates the following:

*1. Why is public participation limited and inefficient?*

Because citizens rarely receive timely and accessible information about decision-making processes.

*2. Why do citizens not receive timely and accessible information?*

Because institutions do not publish data proactively and transparently, in a receptive way and easily visible to citizens, and the digital infrastructure is poorly developed.

*3. Why do institutions not publish data proactively and why is the digital infrastructure poorly developed?*

Because there is an inconsistent application of the existing legal framework, technical and organizational barriers, including regulations that need to be improved in accordance with standards that will enable greater transparency and accessibility of the work of public administration to citizens, outdated technologies and uneven digital capacities.

*4. Why are there such legal, technical and organizational obstacles?*

Because a systemic approach to reform has not been established, which would include the adoption of new laws, intensive digitalization and education of employees and citizens. The Public Administration Reform Strategy 2022-2026 envisages numerous solutions regarding transparency, but it is poorly implemented.

*5. Why has a systemic approach to reform not been established?*

Because there is some resistance to changes within institutions, insufficient political will and a lack of resources for the consistent implementation of the necessary measures.

To sum up, the main causes of limited and ineffective public participation are related to the lack of transparency and availability of information, insufficiently developed digital infrastructure, legal and organizational weaknesses, as well as insufficient support and willingness to implement reforms within the public administration.

### Description of the obligation

#### 1. What has been done so far to solve the problem?

Over the past ten years, Montenegro has recognized the importance of transparency of public administration and the active participation of citizens in decision-making processes, and has launched a number of reforms and initiatives aimed at solving existing challenges. Despite structural weaknesses that continue to be observed, some institutional, legislative and technical advances have been made, in particular through cooperation with international partners, civil society and local communities.

1. Legislative framework and institutional support

One of the key steps was the adoption of the Law on Free Access to Information, the implementation of which played an important role in raising awareness of citizens' right to information. However, the

implementation of this law faces numerous challenges, and activities are underway to revise it in order to bring it into line with European standards. At the same time, the reform of the Law on Local Self-Government is underway, with the aim of further strengthening accountability and openness at the local level.

## 2. Digitalisation and technological progress

On the technical front, Montenegro has established an e-government portal and an open data platform [data.gov.me](http://data.gov.me), which enables electronic search and access to certain databases. In addition, digital transformation pilot projects have been launched in several municipalities. However, digital infrastructure remains unevenly developed, and system interoperability and data standardisation remain an obstacle and not at a satisfactory level.

## 3. Capacity building and education

Within the framework of cooperation with the Council of Europe and the EU, ReSPA organization, trainings and workshops for civil servants on the topic of transparency and access to information were organized. These activities are important for strengthening administrative capacity, but they remain sporadic and insufficiently coordinated, which limits their impact. It is necessary to institutionalize training programs and increase their frequency in order to build a stable staff capable of proactive communication with citizens.

## 4. Budget transparency and public reporting

According to the Open Budget Survey (2023),<sup>12</sup> Montenegro achieved relatively good results in terms of budget transparency, but at the same time very low scores (13/100) when it comes to citizen participation in budget processes. Such results indicate that transparency often remains formal, without real involvement of citizens in the planning and control phases of public spending.

## **2. What solution is proposed?**

Upgrading what has already been done in Montenegro does not imply completely new approaches, but rather deepening, expanding and integrating existing tools and policies, but with an emphasis on quality, accessibility and inclusion. In order to ensure the real, and not just declarative, participation of citizens, it is necessary to approach this challenge through a comprehensive, systemic approach that integrates legal, technological, organizational and educational measures.

Creating mechanisms for real citizen participation requires transforming existing formal consultations into inclusive, transparent and two-way processes. The issue of digital inclusion and accessibility remains crucial. Although portals such as eGovernment and [data.gov.me](http://data.gov.me) are a significant resource, their use must be adapted to all citizens. The development of mobile applications, as well as the installation of local information points in local communities with internet access, can significantly improve equal access to information.

One of the foundations of sustainable change is continuous education and strengthening of human resources. Public servants should be provided with mandatory training on transparency, digital communication and participatory governance, while citizens, especially young people and members of marginalized groups, should be empowered through workshops, campaigns and civic education in formal and non-formal education programs.

Evaluation and monitoring of progress must become a regular practice. The introduction of annual transparency and participation reports, as well as independent monitoring mechanisms that monitor

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<sup>12</sup> [Open Budget Survey Montenegro 2023 | International Budget Partnership](#)

specific indicators, would allow for better performance assessment and identification of room for improvement.

**3. What results do you want to achieve with the realization of this obligation?**

The implementation of this commitment seeks to improve the quality and availability of mechanisms for citizen participation in decision-making, through strengthening two-way communication and empowering civil society. The aim is to create a more open, transparent and inclusive governance process, in which citizens have a real say in public policies. A special focus is on digitalization, education and integration of good international practices.

Obligation Analysis	
Question	Reply
1. How does this help to promote transparency?	This commitment will directly contribute to greater transparency as it implies the development of new and/or improvement of publicly available tools and platforms for citizen engagement, the publication of information in a clear and accessible way, and the establishment of feedback mechanisms. This will allow the decisions of the institutions to be visible, understandable and subject to public scrutiny, which strengthens citizens' trust and the accountability of the authorities. With the introduction of regular reporting and open consultations, it will be evident how citizens' proposals are taken into account and influenced public policies.
2. How does this work promote accountability?	Namely, this obligation introduces concrete tools and mechanisms and standardizes practices among institutions, which reduces fragmentation and an ad hoc approach, and puts the focus on monitoring and evaluation, thus allowing the public to see not only whether institutions are responding, but how and with what effect. The implementation of this commitment reinforces political and operational accountability, as the commitments made in the OGP plan become public and measurable in the international context.
3. How does this task improve the participation of citizens in the definition, implementation and monitoring of solutions?	With the introduction of new participatory tools, citizens will have the opportunity to have an earlier and substantial impact on the shaping of policies, programmes and decisions that directly affect them. By transparently publishing plans and activities by institutions, citizens and the civil sector will be able to monitor how decisions are implemented in practice, and through open communication channels they can point out problems and suggest corrections on the fly. By establishing mechanisms for two-way feedback, citizens become active monitoring actors, not just passive observers of the process.

Commitment Planning					
Key steps	Expected outcomes	Expected period of completion	Stakeholders		
1. <i>Formation of an interdepartmental body for citizen participation</i>	An established body with a mandate to define, coordinate and monitor measures to promote civic participation	Q2 2026	Coordinator: Ministry of Public Administration, OT Open Government Partnerships		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			GSV		/
2. <i>Development and adoption of guidelines and standards for citizens' consultations</i>	Practical Guide for State and Local Authorities to Conduct Public Consultations (including Online and Offline Methods)	Q3 2026	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			GSV, Human Resources Directorate	OT members from the NGO sector	/
3. <i>Organisation of thematic forums (online and live) on public policies</i>	At least 2 forums per year with citizens, representatives of the government and civil sector, and marginalized groups (youth, minorities, citizens from rural areas (online and face) on public policies with the aim of ensuring a continuous dialogue between citizens, civil society and institutions.	Q4 2029 (continuous)	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Line Ministries, Resource Center	OT members from the NGO sector	/
4. <i>Improvement of the eParticipation system</i>	Online dashboard with a record of	Q2 2027	Coordinator: Ministry of Public Administration		

<i>for monitoring and publishing the response of institutions to citizens' suggestions, as well as enabling citizens to send comments directly to the platform</i>	comments received and how they were taken into account % of consultations that publicly report on how the contribution of respondents to the consultation has been used; Anonymized datasets on entries and results of public consultations published for public analysis		<u>Players who support the implementation</u>		
			Government	OCD	Second
					/
<i>5. Trainings and Capacity-Building Campaigns for Citizens and Civil Servants</i>	At least 100 trained officers through seminars, workshops, and online courses  At least 500 trained citizens through seminars, workshops and online courses	Q2 2028 (continuous)	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Human Resources Directorate	OT members from the NGO sector	Donors - international organizations

## OGP COMMITMENT

<b>Country</b>	Montenegro		
<b>The number and name of the obligation</b>	2. FISCAL TRANSPARENCY		
<b>A brief description of the obligation</b>	<i>The commitment includes the establishment of a "Budget Literacy Program" to empower citizens to understand, monitor and influence public spending through knowledge and active participation.</i>		
<b>The Bearer of the Obligation</b>	Ministry of Finance		
<b>Supporting actors</b>	<b>Government</b>	<b>OCD</b>	<b>Other actors</b>
	Ministry of Sport and Youth, Ministry of Labour, Employment and Social Dialogue	OT members from the NGO sector	/
<b>Implementation period</b>	2026 - 2029.		

### Defining the problem

#### 1. What problem does this commitment aim to solve?

Despite the existence of relevant legal and institutional mechanisms, fiscal transparency in Montenegro remains limited, and citizens' access to information on budget spending, planning and auditing is often difficult, fragmented or completely absent. The problem of fiscal opacity is multi-layered because it includes normative shortcomings, poor implementation, institutional inefficiency and insufficient public oversight through civic participation.

In 2023, Montenegro participated for the first time in the international Open Budget Survey conducted by the International Budget Partnership (IBP). Montenegro received 48 out of a possible 100 points, which positions it in 64th place out of 125 countries (IBP, 2023). Although basic budget documents are available (e.g. the adopted budget has a maximum of 100/100), key elements such as the Mid-Year Review and the Citizens' Budget are missing, while the level of public participation in the budget process is rated at only 13/100.

Montenegro has a legal infrastructure that supports transparent management of public finances, including the Law on Budget, the Law on Free Access to Information and real-time electronic fiscalization. However, there are some challenges in the application of the law. For example, although data on the

spending of EU funds and public procurement are formally public, in practice they are fragmented, insufficiently updated and often lack explanations of key items, which is confirmed by the findings of the NGO Institute Alternativa (Institute Alternativa, 2023).

Montenegro has formally established fiscal rules (maximum deficit of 3% and public debt of up to 60% of GDP), but the practice is different. According to data from the International Monetary Fund, the budget deficit was as high as -8.9% in 2022, and public debt exceeded 105% of GDP, which clearly indicates a decline in fiscal discipline (IMF, 2022). Although the Government has repeatedly committed to establishing an independent Fiscal Council to monitor compliance with the rules and make recommendations, its formation has not yet been implemented, creating a supervisory vacuum.

The introduction of e-fiscalization and electronic supervision of the issuance of fiscal invoices was an important step towards combating the grey economy and improving the reversibility of revenues. However, despite technical progress, analyses of the effects of fiscalization are not yet available, and it is not known to what extent this measure has led to a fundamental change in taxpayers' behavior and transparency of state revenues (Fiscal Requirements, 2023).

One of the most serious problems of fiscal opacity is the absence of mechanisms for citizen participation in the budget decision-making process.

Although *the Budget Literacy Program* or similar educational activities alone cannot solve the problems of non-implementation of the law, non-publication of key documents or lack of political will, they have a significant complementary role. Their purpose is to bring the budget process closer to citizens, increase their understanding of public finances and motivate them to participate more actively in monitoring and decision-making. In this way, the capacity of the public to demand accountability from institutions is strengthened, which in the long run can contribute to greater fiscal discipline and transparency.

Montenegro currently has a developed institutional and normative framework for transparent management of public finances, but does not apply it consistently. The lack of political will, the weak capacity of institutions, the lack of oversight and the almost complete marginalization of civic participation result in fiscal policy remaining non-transparent. Unless there are substantial reforms in the direction of implementing existing mechanisms and creating space for public participation, fiscal opacity will continue to undermine public trust.

## **1. What are the causes of the problem?**

### *1. What are the causes of the problem?*

Fiscal opacity in Montenegro stems from a combination of normative shortcomings and inconsistent application of existing laws and regulations. The transparency of public finances is often reduced to the formal fulfilment of the legal minimum, while the content and format of budget documents are not adapted to citizens.

The solution lies not only in the publication of documents, but also in their clear and understandable presentation, which would enable citizens and civil society to actively participate in monitoring budget processes and making suggestions.

### *2. Why do citizens not have complete and clear information on how the state spends public money?*

Because key budget documents have either not been published (e.g. Mid-Year Review, Citizens' Budget), or have been published in a format that is inaccessible to the public, difficult to understand, fragmented and without additional explanation and analysis.

*3. Why are these documents missing or poorly presented?*

Because in public administration, there is no operational obligation to communicate information proactively, clearly and in a timely manner. The focus of the institutions is mainly on the formal fulfilment of the legal minimum, and not on transparency as a democratic value.

*4. Why is the focus of institutions not on openness?*

Because there is not a sufficiently developed system for monitoring and monitoring the quality of published data. Citizens and civil society are poorly involved in the decision-making process, and the media and the research sector do not have constant insight into the flows of public money. Also, the absence of an independent Fiscal Council means that there is no external control of budgetary policy.

*5. Why is there no independent oversight and civil pressure?*

Because supervisory institutions do not have sufficient capacity, and existing participation mechanisms are not sufficiently used. Civil society faces limited resources and public pressure remains sporadic.

*6. Why is there resistance to real transparency and accountability?*

Because transparency requires additional work, better planning and consistent control, while in underdeveloped accountability mechanisms, such a practice does not bring immediate incentives to institutions.

**Description of the obligation**

**What has been done so far to solve the problem?**

Montenegro has taken a number of reform steps to improve fiscal transparency, but the effects of these measures have so far been limited.

Key laws such as the Law on Budget and Fiscal Responsibility, which defines fiscal rules and directions of budget planning, have been adopted. Also, the Law on Free Access to Information formally allows the public access to budget and financial data. In addition, the Fiscal Strategy 2024-2027 envisages the establishment of an independent Fiscal Council, which would oversee the implementation of fiscal rules. The introduction of the e-fiscalization system in 2021 is an important technical reform, as it enables electronic records of fiscal invoices in real time. Also, digital portals for public procurement and budget documents have been created, which has made certain data more accessible. However, these tools work without a serious analysis of the effects.

Part of the budget documents (budget proposal, adopted budget, final accounts, SAI audits) is published on the website of the Ministry of Finance. However, key elements of fiscal transparency, such as the citizens' budget and the mid-term review of budget implementation, which are standard in developed democracies, are missing. Montenegro has made an important but insufficiently consistent start in addressing fiscal opacity. There are laws, strategies, digital tools, and international engagement, but they lack:

- The institutional will to do so,
- active supervision and
- involvement of citizens.

Without operational enforcement of the law, without real oversight and without public pressure, fiscal transparency remains more declarative, while reforms should represent a change in the way public money is planned, spent and controlled.

**2. What solution is proposed?**

One of the key problems of fiscal opacity in Montenegro is not only the lack of information, but also the fact that most citizens, including young people, local activists and journalists, do not know how to use, understand or monitor this information.

That is why the solution cannot be just another strategy or law, but must start with the people, that is, with the introduction of an innovative and inclusive Civic Budget Literacy Program, which aims to empower citizens to become active monitors of public spending and equal participants in decision-making on public money.

The "Civic Budget Literacy Program" is an informal educational program that, through practical workshops and digital tools:

- Trains citizens to understand how budgets are created, adopted, and executed.
- shows them where to find and analyse public spending data;
- teaches them how to advocate for their priorities in the budget;
- It empowers them to recognize suspicious spending patterns and alert the public.

The program is aimed at young people, NGOs and media who want to develop a participatory model of public funds management. The "Civic Budget Literacy Program" is not only an educational program, but also a tool of social control, which connects knowledge, data and participation.

### **3. What results do you want to achieve with the realization of this obligation?**

The introduction of the "Civic Budget Literacy Program" can initiate a profound change in the way Montenegrin citizens perceive public money and their role in deciding on its spending. The aim of the program is not only to transfer knowledge, but to foster a new culture of responsibility and participation. When citizens realize that the budget is not an abstraction, but a plan that determines whether the school will have heating, whether the street will be lit or the health center will have a doctor, then the budget becomes a personal matter and there is a growing willingness to ask questions, seek answers and defend the public interest.

This initiative seeks to create a chain reaction for an educated citizen to become an active citizen, for institutions to feel the pressure to be more open, and for public policies to be designed in dialogue with the community. In the long run, this means stronger democracy, more resilient institutions, and a healthier economy.

<b>Obligation Analysis</b>	
<b>Question</b>	<b>Reply</b>
1. How does this commitment promote transparency?	The introduction of the "Civic Budget Literacy Program" is a mechanism that improves transparency by empowering citizens to understand, analyze and monitor public spending. This commitment contributes to the development of an informed and engaged society, which demands institutional accountability and influences decisions on public finances. This raises the standard of openness: from the formal availability of data, to the intrinsic accountability of decision-makers.
2. How does this obligation promote accountability?	This obligation encourages the accountability of institutions because it removes the space for non-transparent management of public money. When citizens know how the budget works, how decisions are made, and where the data is located, they become an active corrective to the government.

	Such pressure "from below" changes the behavior of institutions because every decision on the spending of public funds becomes a potential issue for the public. That is why this obligation not only strengthens oversight, but also forces decision-makers to act transparently and responsibly.
2. How does this task improve the participation of citizens in the definition, implementation and monitoring of solutions?	This obligation significantly improves the participation of citizens by enabling them to actively participate in all phases of the public finance management process: from defining budget priorities, through monitoring implementation, to supervising budget execution. Education enables a partnership between citizens and institutions.

Commitment Planning			
Key steps	Expected outcomes	Expected period of completion	Stakeholders
<i>Needs analysis and curriculum development</i>	Detailed analysis of the existing level of budget literacy and identification of target groups	Q4 2026	Holder: Ministry of Finance, NGO sector
			<u>Players who support the implementation</u>
			Government
	Development of an adapted curriculum and teaching methodology		Ministry of Labour, Employment and Social Dialogue, Ministry of Sport and Youth
	Identify the resources and partners needed to implement the program.		OT members from the NGO sector
<i>Formation of partnerships and training of trainers</i>	Establishing cooperation with institutions, NGOs and the media	Q2 2027	Holder: Ministry of Finance, NGO sector
			<u>Players who support the implementation</u>
			Government
	Selection and Training of Key Trainers to Conduct Trainings		Ministry of Labour, Employment and Social Dialogue, Ministry of Sport and Youth
	Preparation of training materials and teaching tools		OT members from the NGO sector

<i>Pilot program and evaluation</i>	Implementation of pilot workshops/education  Collecting feedback from participants and partners  Creating an evaluation report and adjusting the program as needed	Q4 2028	Holder: Ministry of Finance, NGO sector		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Labour, Employment and Social Dialogue, Ministry of Sport and Youth	OT members from the NGO sector	/
<i>Monitoring and reporting of results</i>	Regular reports on the number of trained citizens, initiatives launched and impact on local policies  Monitoring Changes in Budget Transparency and Civic Participation  Recommendations for further development and sustainability of the programme	Q1 2029	Holder: Ministry of Finance, NGO sector		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Labour, Employment and Social Dialogue, Ministry of Sports and Youth,		/

## OGP COMMITMENT

<b>Country</b>	Montenegro		
<b>The number and name of the obligation</b>	3. STRENGTHENING INTEGRITY AND PUBLIC ACCOUNTABILITY FOR THE FIGHT AGAINST CORRUPTION		
<b>A brief description of the obligation</b>	<i>Through the creation of an interactive online map <b>Corruption on the Map – Civic Oversight through a digital map of reports and evaluations of public institutions</b>, citizens will be able to anonymously report suspicions of corruption, assess the transparency of the work of institutions and visually monitor the "hotspots" of non-transparency in real time. This commitment empowers the public to take an active role in overseeing institutions, increasing accountability and visibility of anti-corruption efforts.</i>		
<b>The Bearer of the Obligation</b>	Ministarstvo pravde Agency for Prevention of Corruption		
<b>Supporting actors</b>	<b>Government</b>	<b>OCD</b>	<b>Other actors</b>
	Directorate for Statistics, Ministry of Public Administration	OT members from the NGO sector	IT sector
<b>Implementation period</b>	2026 – 2029		

**Defining the problem**

## 1. What problem does this obligation aim to solve?

For a decade, Montenegro has been facing lame anti-corruption mechanisms that, although they formally exist, in practice do not inspire the trust of citizens, nor do they produce the expected results.

According to the European Commission's 2023 report, "concerns remain about the selective approach of the judiciary and the limited track record in investigations into high corruption". In the Transparency International Corruption Perceptions Index for 2024, Montenegro recorded only 46 points (out of 100), which is below the European average and without visible progress.

From the perspective of citizens, which is confirmed by the answers to the questionnaire that preceded the design of this obligation, the perception is clear: corruption is present, especially in employment and public procurement, and institutional responses are weak, slow or completely absent. Citizens do not have functional tools for reporting and monitoring corruption in real time, and the existing mechanisms are closed, non-transparent and inactive.

## 2. What are the causes of the problem?

The causes of the problems related to poor reporting of corruption by citizens are not superficial or technical, they are rooted in mistrust, systemic exclusion and closure of institutions. Citizens do not report corruption not because they do not see irregularities, but because they do not see the purpose, because their reports most often remain unanswered, without results and without any visible effect.

This situation stems from the fact that the reporting system is not designed as a tool for civic oversight, but as a closed administrative channel, which excludes the citizen from the further course of action.

At its core, the problem is that the citizen is not recognized as a partner in the fight against corruption, but as a passive user.

This obligation aims to change the logic of the system, in which reporting corruption becomes visible, monitored, interactive and publicly accountable, and the citizen moves from the role of a passive witness to the role of an active actor in anti-corruption supervision.

The 5Why method shows the following:

### 1. Why don't citizens report corruption?

Because they don't believe that anything will change.

### 2. Why don't they believe?

Because they don't see results or feedback when they apply.

### 3. Why is there no feedback?

Because they have repeatedly witnessed impunity and selective application of the law.

### 4. Why did citizens witness impunity and selective application of the law?

Because the system does not function as a two-way and transparent mechanism, but as a closed bureaucratic mechanism.

### Why isn't the system two-way?

Citizens are not recognized as active actors in the fight against corruption, but as passive observers.

## Description of the obligation

### What has been done so far to solve the problem?

Over the past decade, Montenegro has established a number of institutional and technical tools that should, at least formally, contribute to the fight against corruption. Among them, the most famous are the Public

Procurement Portal, the eGovernment system, and the activities of the Agency for the Prevention of Corruption. However, while these mechanisms are a step forward in the digitalization of administration and formal transparency, their impact on the perception and practice of the fight against corruption remains insufficient.

The Agency for the Prevention of Corruption, although formally a key institution in this domain, has failed to position itself as an effective actor. Numerous reports, both from domestic civil society organizations and the European Commission, point to the lack of concrete results in the prosecution of high corruption, as well as political selectivity and lack of capacity for systemic work.

At the local level, there are anti-corruption plans (LAPs) but without actual implementation, evaluation or consultation with citizens.

In essence, the current approach to the fight against corruption in Montenegro is characterized by the dominance of formal and procedural solutions without real citizen participation and without visible, measurable effects that would increase trust in institutions.

## **2. What solution is proposed?**

It is proposed to establish an interactive digital platform in the form of a map, which will enable citizens to report suspicions of corruption in real time and assess the transparency of the work of institutions. This platform would be unique in the Montenegrin context because it would include multiple functionalities in one tool, thus covering both problem reporting, public visibility and institutional response.

The platform would allow:

- Citizen whistleblowing, anonymous or with identity, with simple user experience and thematic categorization (e.g. public procurement, employment, misuse of resources).
- Evaluation of the work of institutions, through predefined indicators such as promptness, openness to communication, availability of information and compliance with procedures.
- Visualization of the foci of non-transparency on the map of Montenegro, whereby the locations with the most applications or the lowest scores would be marked as "red dots", with the possibility of searching by sector or municipality.
- A mandatory institutional response, which means that the relevant institution will have a defined deadline to respond to the application (even if it is negative) and that this response is public and available to all.
- Monthly reports and public rankings that summarize trends, ratings, number of applications and institutional responses, which are automatically published and shared.

What sets this obligation apart is the fact that it uses reputation, digital visibility, and collective citizen oversight mechanisms to put pressure on institutions to act transparently. It is planned to create a Reputation Index in such a way as to establish a formula for calculating this index, and based on this index, each institution receives a monthly score from 0 to 100, based on which a ranking list by sectors and municipalities is defined, which is published publicly. Of the parameters for calculating this index, it is necessary to take into account the following:

- *Response to reports (% of reports responded in the last 30 days),*
- *Quality of response (Manual or AI scoring (response complete, relevant, timely),*

- *Average rating of citizens (Score from 1–5),*
- *Response time (Speed in days (shorter = better),*
- *The number of "closed with an outcome"( Reports that led to a specific action)*

In addition to this, survey indicators on a semi-annual basis would be included and thus measure citizens' satisfaction with the work of a specific platform.

Instead of the fight against corruption being conducted in private, within cabinets and offices, it is brought out to the public, visualized and democratized.

People are not passive observers. On the contrary, their perception becomes relevant, their rating carries weight, and their reporting gains visibility and meaning. Such a platform does not replace the institutional system, but complements and opens it up, making it more sensitive to signals from the field and more susceptible to public scrutiny.

The goal is not just for citizens to "report," but to create a new social moment, in which transparency is a daily practice, not the exception. Through this commitment, Montenegro has the opportunity to introduce an innovative, concrete and measurable mechanism that directly links civic perception with institutional action, thus breaking the cycle of mistrust and passivity.

### **3. What results are to be achieved by the realization of this obligation?**

The realization of this commitment aims to create visible and measurable progress in the fight against corruption.

The first concrete result is a significant **increase in the number of reports of suspected corruption and irregularities**, Through a secure mechanism on a digital map, citizens will have access to a tool that does not require knowledge of the legal procedure, but only the will to point out the problem. The number of applications is expected to be many times higher compared to previous periods, especially in areas where reporting has so far been marginalized or discouraged.

The second result refers to **the establishment of a reputation system for public institutions, through evaluation and comments of citizens**. This system will introduce a public ranking list of institutions according to the ratings of transparency, timeliness, professionalism and openness. Institutions with the lowest scores will be clearly marked as "red dots" on the map, while positive examples will be singled out as examples of good practice. This visible reputation of institutions aims to introduce a new kind of pressure, not only legal, but also public and social.

The third key result is **the establishment of the practice that all reports receive a response** in the form of an institutional comment, explanation of measures, status of the procedure or reasons for non-action. This is a significant qualitative shift, as feedback is the basis for trust in the system.

The fourth result will be a **measurable increase in the perception of accountability and transparency**, both among citizens and within the public administration itself. By surveying the users of the platform and measuring the number of active users, it will be possible to assess the effect of this intervention on citizens' trust in institutions.

Another expected result is **the establishment of a sustainable, institutionalized platform**, as an integral part of the national anti-corruption framework.

Obligation Analysis	
Question	Reply
1. How does this commitment promote transparency?	This obligation brings a new kind of transparency, visible, accessible and understandable to citizens. Through an interactive map, everyone has an insight into where there are problems, what citizens report and how institutions react. Instead of hidden data, an open picture of the situation in real time is obtained, thus building trust through clarity and publicity.
2. How does this obligation promote accountability?	Institutions can no longer remain silent to reports of corruption or suspicion of corruption, because reports and their (non)reaction are publicly visible. The platform introduces a culture of response, where each institution is invited to explain, react and correct.
3. How does this task improve the participation of citizens in the definition, implementation and monitoring of solutions?	Citizens are no longer just observers, but active participants in the supervision and improvement of the work of institutions. The platform allows for continuous and meaningful participation, in which each entry contributes to greater accountability and better governance.

Commitment Planning			
Key steps	Expected outcomes	Expected period of completion	Stakeholders
<i>1.Co-creation of platform design with the IT sector</i>	Defining the design of the Platform and initiating administrative procedures for implementation	Q1 2027	Coordinator: Ministry of Justice, Agency for Prevention of Corruption
			<u>Players who support the implementation</u>
			Government      OCD      Second
			Ministry of Public Administration, Ministry of Ecology, Sustainable Development and Development of the North, General Secretariat OT members from the NGO sector It's a community

			of the Government		
<p>2. Launch of a national campaign and promotion of the Civic Oversight Platform</p> <ul style="list-style-type: none"> <li>• Implementation of educational activities (seminars, workshops, trainings) on reporting and prevention of corruption.</li> <li>• Implementation of promotional activities in cooperation with the media.</li> <li>• Conducting periodic surveys on the perception of corruption and citizens' trust in institutions.</li> </ul>	<p>Established a functional Platform and increased use of available citizen monitoring tools</p> <p>Increase by 50% in reports of suspected corruption compared to the reference year 2025</p> <p>Increased percentage of citizens familiar with the ways and mechanisms of reporting corruption and the operation of institutions.</p> <p>Percentage of citizens' trust in institutions (measured through research).</p> <p>The number and type of training, events and media activities carried out.</p> <p>The number of institutions and actors involved in the implementation.</p> <p>Number of content in open (data) format derived from quarterly reports.</p>	<p>Q4 2027 (continuous)</p>	<p>Coordinator: Ministry of Justice, Agency for Prevention of Corruption</p>		
			<p><u>Players who support the implementation</u></p>		
			Government	OCD	Second
				OT members from the NGO sector	/
<p>3. Quarterly reports on the performance and participation of citizens</p>	<p>Regular reports analyze trends and problems by sector;</p>	<p>Q4 2029 (continuous)</p>	<p>Holder: Ministry of Justice, Agency for Prevention of Corruption</p>		
			<p><u>Players who support the implementation</u></p>		
			Government	OCD	Second

	Data from the report available in open data format				
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## OGP COMMITMENT

<b>Country</b>	Montenegro
<b>The number and name of the obligation</b>	4. OPENNESS OF LOCAL SELF-GOVERNMENTS
<b>A brief description of the obligation</b>	<i>Improving transparency at the level of local self-governments through the establishment of uniform standards of openness and the development of template digital services.</i>

<b>The Bearer of the Obligation</b>	Local self-governments		
<b>Supporting actors</b>	<b>Government</b>	<b>OCD</b>	<b>Other actors</b>
	Ministry of Public Administration	<i>OT members from the NGO sector</i>	<ul style="list-style-type: none"> <li>• <i>Zajednica opština Crne Gore</i></li> <li>• <i>Civil Society Organizations</i></li> <li>• <i>Academic community</i></li> <li>• <i>Međunarodni partneri (OGP, SIGMA, ReSPA, DEU)</i></li> </ul>
<b>Implementation period</b>	2026-2029		

Defining the problem
<p><b>1. What problem does this obligation aim to solve?</b></p> <p>Since 2012, Montenegro has been building a culture of openness and participation through the Open Government Partnership (OGP), but an uneven degree of transparency is maintained at the local level. In previous NAP cycles, the openness of local self-governments in Montenegro was assessed as insufficient, with an average fulfilment of the criteria of about 50%. Some municipalities are proactively publishing information, developing digital services, and engaging citizens. However, a large number of municipalities still do not meet basic standards of transparency. The consequences are:</p> <ul style="list-style-type: none"> <li>• a fragmented approach to the publication of data on work and budget;</li> <li>• difficult access to data of public importance;</li> <li>• limited digitalisation of essential services;</li> <li>• uneven practice of publishing documents and decisions;</li> <li>• lack of reliable channels for the involvement of citizens and the civil sector.</li> </ul> <p>IRM reports and recommendations from international partners point to the need for uniform standards of openness, strengthening the digital capacities of local administrations and a culture of proactive publishing.</p>
<p><b>2. What are the causes of the problem?</b></p> <ol style="list-style-type: none"> <li>1. <b>Uneven standards of openness</b> There is no single definition of minimum criteria or mandatory deadlines for the disclosure of key information. There are significant differences in the quality of information and the accessibility of digital services. Lack of clear standards and practices for transparency and public reporting. – <i>Reminder for local self-government units: in the previous cycle, the measure from the previous NAP was partially implemented.</i></li> <li>2. <b>Lack of support for digital services</b> Digital tools and platforms have been developed on an ad hoc basis, without centralized guidance and technical assistance.</li> </ol>

**3. Limited technical and human capacities**

Smaller municipalities do not have enough IT experts or budget resources to develop and maintain services.

**4. Poor coordination and exchange of experiences**

Best practices do not spread systematically among local self-government units.

**Description of the obligation**

**1. What has been done so far to solve the problem?**

In practice so far, local self-governments have taken the following steps to strengthen openness:

- Most local self-government units regularly publish legally prescribed information (plans, work reports, budget data), but without a uniform quality methodology and formats adapted to the general public.
- Pilot projects focused on digital services and open data have been implemented in several municipalities, and three municipalities (Bar, Plav, Žabljak) have joined the OGP Local initiative.
- Ad hoc trainings for transparency and digital tools officers were organized, with the support of domestic NGOs and international partners; However, the trainings were not systematically planned or evaluated through uniform standards.
- Standard mechanisms for public debates and consultations (public sessions, online forums, questionnaires) have been introduced, but without a centralized system for monitoring submitted proposals, their processing and regular reporting on the effects they have caused.
- Within the previous NAPs, initiatives to improve transparency have been launched (development of guidelines for data publication, pilot portals, participatory budgeting model), but no single set of progress indicators has been defined or mandatory deadlines for their implementation in all municipalities.

These efforts so far have created a fragmented basis for openness: they have set initial examples of good practice, but they have not enabled a harmonised and measurable application of standards at all levels of local self-government.

**2. What solution is proposed?**

- Introduction of minimum standards of openness: each local government will adopt uniform criteria for the proactive disclosure of key information (budget, decisions, contracts, minutes), ensuring consistency and transparency at the national level.
- Capacity building through continuous training: regular, certified programs for local government officials (e.g. e-transparency, open data management, communication with citizens) will build expertise and a culture of openness in all local self-government units.
- Transparent reporting and evaluation system: An annual mechanism for ranking municipalities according to the degree of openness will be established, with the publication of an interactive report and the organization of regional workshops for the exchange of good practices, which will continuously encourage local authorities to improve and allow citizens to monitor progress.

**Monitoring and evaluation**

- Establishment of an annual ranking of municipalities according to the degree of openness
- Organisation of regional workshops for the exchange of best practices and adaptation of standards
- Involvement of the Independent Reporting Mechanism (IRM) and civil society in the verification of data and making recommendations for the coming year

**3. What results are to be achieved by the realization of this obligation?**

With the implementation of this commitment, it is expected to:

- **Increased openness of local governments:** All municipalities consistently apply uniform standards of openness, which allows citizens easier and faster access to information about the work, budget and decisions of local authorities.
- **Established and functional template digital services:** Local governments have developed template digital services that rely on national systems, with the aim of increasing efficiency and uniform availability of data/information.
- **Strengthening the capacity of employees:** Local officials are continuously trained in the application of openness standards and the management of digital services, which contributes to the professionalization and sustainability of the transparency process.
- **Regular and public reporting on progress:** A system of annual reporting and public ranking of municipalities according to the degree of openness has been established, which encourages competition, enables monitoring of progress and strengthens citizens' trust in local institutions.
- **Compliance with European Open Government Standards:** Local self-government in Montenegro operates in accordance with European best practices, which contributes to the overall strengthening of democratic culture and accountability at the local level.

Obligation Analysis	
Question	Reply
1. How does this commitment promote transparency?	The obligation fosters transparency through the establishment of minimum standards for the publication of information at the local level, including budget data, decisions, contracts and minutes, allowing citizens easy and quick access to all relevant documents and data. Regular and public reporting on the openness of municipalities further strengthens the visibility of the work of local authorities and enables comparability between municipalities.
2. How does this obligation promote accountability?	With the introduction of mandatory standards and annual reporting, local governments become more accountable to citizens and central institutions. Public ranking of municipalities in terms of the degree of openness encourages competition and motivates local authorities to continuously improve their practices. The involvement of the Independent Reporting Mechanism (IRM) and civil society in the monitoring contributes to an objective assessment of the results and timely response to any failures.
4. How does this task improve the participation of citizens in the definition, implementation and monitoring of solutions?	Digital e-consultation platforms allow citizens to propose priorities, vote on projects and monitor the status of their proposals in real time. Citizens' feedback is systematically collected and used to adapt and improve the solution during the duration of the obligation.

Commitment Planning			
Key steps	Expected outcomes	Expected period of completion	Stakeholders
1. Development and adoption of minimum standards of openness	Adopted standards of openness and mandatory	Q4 2026	Coordinator: Ministry of Public Administration

<i>for all local self-governments</i>	publication of key information of open data in all local self-governments (each municipality regularly publishes basic data sets, including the budget, public procurement procedures and minutes of assembly sessions, in standardized and publicly available formats).		<u>Players who support the implementation</u>		
			Government	OCD	Second
			Local self-governments	OT members from the NGO sector	Community of Municipalities, International Partners
<i>2. Organization of continuous trainings for employees in local self-governments</i>	Strengthening the capacity of employees for transparent and accountable management (encourage the exchange of knowledge and experience among local self-government units: members of OGP Lokal from Bar, Plav and Žabljak can provide advisory support to other municipalities)	2026–2029.	Coordinator: Human Resources Administration, Local Self-Governments		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Public Administration		Zajednica opština
<i>3. Establishment of a system of annual reporting and ranking of local self-governments according to openness</i>	Regular reporting, public availability of results and fostering competitiveness between local self-governments (rankings and performance evaluation reports should be tailored to citizens, regularly updated (at least once a year) and include mechanisms for collecting and	Every year until 2029, continuously	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
					Local Self-Governments, Independent Reporting Mechanism (IRM), Citizens, Community of

	processing citizens' feedback.				Municipalities
4. <i>Development and launch of template digital services</i>	Functional digital services in local self-governments;	Thu 2029. kontinuirano	Coordinator: Local Self-Government		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Public Administration		The Independent Reporting Mechanism (IRM)
5. <i>Introduction and expansion of participatory e-consultations</i>	At least 100 registered citizens; A minimum of 100 suggestions/comments per year.	Q4 2027 – Q4 2028	Coordinator: Local Self-Government		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Public Administration	OT members from the NGO sector	Community Municipalities, Academia, Citizens

## OGP COMMITMENT

<b>Country</b>	Montenegro
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<b>The number and name of the obligation</b>	5. DIGITAL MANAGEMENT		
<b>A brief description of the obligation</b>	<i>Accelerating the digital transformation of public administration in Montenegro through improving system interoperability, developing advanced electronic services, strengthening cyber security and increasing digital literacy of citizens and public servants, with the implementation of artificial intelligence in public processes.</i>		
<b>The Bearer of the Obligation</b>	Ministry of Public Administration		
<b>Supporting actors</b>	<b>Government</b>	<b>OCD</b>	<b>Other actors</b>
	Ministry of Education, Science and Innovation  Ministry Economic development  Human Resources Directorate	OT members from the NGO sector	<ul style="list-style-type: none"> <li>• <i>Local self-governments</i></li> <li>• <i>Zajednica opština</i></li> <li>• <i>Agency for Electronic Communications and Postal Services (EKIP)</i></li> <li>• <i>Central Bank of Montenegro</i></li> <li>• <i>Civil Society Organizations</i></li> <li>• <i>Academic Community and Science Technology Park</i></li> <li>• <i>The Private Sector and IT Companies</i></li> <li>• <i>International partners (EU, UNDP, UNOPS, ITU, SIGMA, ReSPA)</i></li> </ul>
<b>Implementation period</b>	2026-2029		

Defining the problem

### **1. What problem does this commitment aim to solve?**

Since 2021, Montenegro has made significant progress in the digital transformation of public administration, in particular through the project "E-services and digital infrastructure in response to COVID-19" funded by the European Union. This project has resulted in over 45 new e-services, a new e-Government portal and an improved user experience. However, the analysis shows that progress has been fragmented and slower than expected, as the country has not yet harnessed the full potential of digital transformation to ensure an efficient and transparent state administration.

Digital governance in Montenegro is characterized by fragmented implementation of digital solutions, insufficient interoperability between systems, limited application of artificial intelligence and uneven digital capacities between central institutions and local governments. Despite the fact that over 45 electronic services have been developed through EU projects, many institutions still operate with outdated processes, and citizens and businesses have not fully exploited the potentials of digitalization.

### **2. What are the causes of the problem?**

- Insufficient coordination between institutions responsible for digital transformation
- Uneven development of digital capacities among state bodies and local governments
- Limited interoperability between existing information systems and registers
- Lack of skilled workers with the necessary digital skills
- Fragmented implementation without a unified e-government architecture
- Cybersecurity risks, especially after the 2022 attacks
- Insufficient digital literacy of citizens (only 25% fully digitally literate)
- The initial phase in the application of artificial intelligence without a strategic approach

### **Description of the obligation**

#### **What has been done so far to solve the problem?**

The Ministry of Public Administration has achieved significant results through various projects and initiatives:

- The project "E-services and digital infrastructure in response to COVID-19" was implemented, which resulted in over 45 new electronic services
- The Coordination Body for the Management of the Digital Transformation Process has been established, which brings together representatives of key institutions in order to ensure horizontal coordination and supervision of the implementation of reform measures in the field of digitalization
- An Operational Team has also been formed to monitor the implementation of the Service Plan for Digitalization, which operationally monitors progress and provides recommendations for further steps.
- The Service Plan for Digitalization was adopted, as a central document that defines priorities, deadlines and responsible institutions for the digitalization of 171 services by the end of 2027. The plan has a clear year-by-year dynamic, including a target of 57 services in 2025
- The Digital Transformation Strategy of Montenegro 2022-2026 was adopted as the central document for the construction of "Digital Montenegro"
- A new e-Government portal has been established
- An Open Data Portal ([data.gov.me](http://data.gov.me)) has been developed that is integrated with the European Open Data Portal
- Improved systems such as eDMS (electronic document management system) and eSV (electronic system for monitoring government sessions) have been implemented
- The GovME CA Certification Body was established, making the Ministry of Public Administration a qualified provider of electronic trust services for the first time. This creates all the prerequisites for the safe and controlled use of digital services, in accordance with European standards. Seven standardized trust services are now available to state administration bodies,

speeding up administrative processes, strengthening citizens' trust in e-government and paving the way for further digital transformation of Montenegro.

- A new Metaregister has been established, which represents an important step towards the accelerated digitalization of public administration, as it enables better inter-institutional coordination, reduction of administrative barriers and faster exchange of data. It brings together more than 170 electronic registers, information systems and web services from various institutions.
- The Government's Monitoring, Detection and Incident Response Operations Centre (GSOC) was formed following the 2022 cyberattack
- In order to raise the level of trust with international partners, the process of obtaining TF-CSIRT accreditation has been initiated.
- The development of the National Plan for Response to Cyber Threat, Serious Cyber Threat, Incidents and Cyber Crisis is also in the final phase.
- The process of creating a list of key and important entities in accordance with the Law on Information Security has begun.
- Certain activities have been launched and implemented as part of the project "Digital Transformation of Local Self-Governments" (2024-2025), which is implemented with the support of UNOPS/ITU
- The first Report on Readiness for the Application of Artificial Intelligence in Public Administration has been presented<sup>13</sup>

## 2. What solution is proposed?

- **Strengthening interoperability and a single eGovernment architecture:**

Development of a unique e-government architecture that enables seamless/continuous exchange of data between electronic registers or institutions

Expansion of the capacity of the Single System for Electronic Data Interchange (JSERP) to connect all electronic registers

Implementation of the national interoperability framework at all levels of public administration, which is aligned with the European Framework of 2024

- **Digitalization of Transaction Services:**

Implementation of the plan for full digitalization of transactional public electronic services at the national and local level

Using the IBM BPM platform to automate business processes across multiple institutions

Development of 24/7 digital services for citizens and businesses

- **Cyber Security and Resilience:**

Strengthening GSOC and Implementation of the Law on Information Security as a Transposition of the NIS2 Directive

Capacity development through the Regional Cyber Security Center (WB3C and other international partners) in Podgorica

Implementation of advanced systems of protection against cyber threats.

Establishment of a laboratory that will enable the analysis and testing of security threats, and at the same time be an internal training center in order to share knowledge and experience gained in the previous period.

- **Capacities and digital literacy:**

Expansion of the new eAcademy program for continuous training of civil servants

Implementation of programs to increase digital literacy of citizens through partnership with ZZZCG

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<sup>13</sup> [Artificial Intelligence Readiness Assessment \(AILA\) Report | United Nations Development Programme](#)

<p>Strengthening digital competences through cooperation with the Parliament of Montenegro</p> <ul style="list-style-type: none"> <li>• <b>The use of artificial intelligence:</b> Development and implementation of the first national Strategy on Artificial Intelligence Integration of AI tools on Government portals, eGovernment, Open data Focusing on sectors with competitive advantages: tourism, energy, environment, health</li> <li>• <b>Local digitization:</b> Support to local self-governments through the project "Digital Maturity Assessments"<sup>14</sup> Standardization of digital services at the local level Regional workshops for the exchange of best practices</li> </ul>
<p><b>3. What results are to be achieved by the realization of this obligation?</b></p> <p>With the implementation of this commitment, it is expected to:</p> <ul style="list-style-type: none"> <li>• Increase the number of transactional electronic services from the current 45 to at least 150 by the end of 2029.</li> <li>• Strengthening interoperability through the interconnection of all key registers and state administration systems</li> <li>• Cyber security - implementation of the NIS2 Directive and strengthening national capacities for incident response, ensuring citizens' trust, protecting open data and ensuring a secure digital environment.</li> <li>• Digital literacy - increase from the current 25% to 45% of fully digitally literate citizens</li> <li>• Local digitalization - all local governments have a basic digital environment and e-services</li> <li>• User Experience - 90% customer satisfaction with electronic services (currently around 50%)</li> </ul>

Obligation Analysis	
Question	Reply
1. How does this commitment promote transparency?	The commitment strengthens transparency through the development of advanced open data portals, the implementation of proactive disclosure of information through digitized processes, and enabling citizens to have easier access to information through 24/7 available electronic services. AI tools will enable the automatic generation of reports and analyses, making the work of public administration more visible and understandable.
2. How does this obligation promote accountability?	Digitization of processes enables full transparency and monitoring of administrative procedures, and electronic signatures and recording time ensure documented accountability. The GSOC system provides continuous monitoring of cybersecurity, while AI tools enable predictive analysis and timely response to problems. Interoperability between systems facilitates the control and auditing of processes.
3. How does this obligation improve the participation of citizens in defining, implementing and monitoring solutions?	Digital platforms enable continuous collection of feedback from users of electronic services, while AI chatbots provide 24/7 support and answer citizens' questions. The e-Government Portal will include functionalities for online consultations and proposals, and local governments will digitally transform their processes. Digital literacy programs

<sup>14</sup> [Digital Transformation of Local Governments in Montenegro](#)

	enable citizens to participate more actively in digital processes.
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Commitment Planning					
Key steps	Expected outcomes	Expected period of completion	Stakeholders		
1. <i>Development and implementation of the National Strategy on Artificial Intelligence</i>	Adopted strategy and the first AI tools integrated into the portals of the Government, eGovernment, Open data  Risk Assessment Tool (Risk Assessment Tool)  Preparation of reports according to UNESCO methodology	Q4 2027	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Ministry of Education, Science and Innovation	OT members from the NGO sector	Academia, private sector, international partners
2. <i>Strengthening interoperability and expansion of JSERP systems</i>	Linked key registers and full electronic exchange of data between institutions established	Q2 2027	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
			Policy institutions		Local self-governments
3. <i>Implementation of advanced cyber security systems and NIS2 directive</i>	Strengthened cyber resilience and established 24/7 GSOC monitoring  A well-functioning Cyber Security Agency has been established	Q4 2027.	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
					EKIP, WB3C, International Partners
4. <i>Digitalization of transaction services and</i>		Q1 2029.	Coordinator: Ministry of Public Administration		

<i>digital transformation at the local level</i>	At least 100 electronic services available 24/7 in accordance with digitized template services at the central and local level		<u>Players who support the implementation</u>		
			Government	OCD	Second
			Policy institutions		Local Governments, International Partners
5. <i>Increasing digital literacy and AI capacity</i>	45% of digitally literate citizens and the systemic application of AI in public administration	2029.	Coordinator: Ministry of Public Administration		
			<u>Players who support the implementation</u>		
			Government	OCD	Second
				OT members from the NGO sector	Local Self-Governments, Academia