

Independent Reporting Mechanism

Results Report:
Kosovo 2023-2025

Open
Government
Partnership



Independent
Reporting
Mechanism

Table of Contents

Executive Summary2

Section I. Key Observations4

Section II. Early Results.....8

Section III. Participation and Co-Creation 12

Section IV. Methodology 16

Annex I. Commitment Data..... 18

Executive Summary

Kosovo's first OGP action plan (2023–2025) improved the transparency of recruitment of high-level officials. However, most of the other commitments saw limited completion. The action plan was co-created through an open and inclusive process, but implementation lacked central coordination and stakeholder engagement. Future action plans could benefit from a more systematic OGP infrastructure and structured partnerships with civil society in co-creating and co-implementing commitments.

Implementation

Kosovo's 2023–2025 action plan included 13 commitments spanning digital governance, open data, citizen participation in decision-making, civic space, public procurement, and political finance transparency. Commitment 4.2 (transparent recruitment of high-level officials) achieved substantial completion. This commitment led to a new legal framework and a central human resources management platform contributed to a more standardized recruitment process, with public vacancy announcements and online applications. However, transparency gaps remained (e.g., lack of panel-level scoring disclosure and inconsistent justification practices), integrity safeguards were not institutionalized as foreseen, and the reliance on acting appointments limited the contribution of reforms to public trust and accountability.

Other commitments progressed unevenly or were stalled. Many commitments that involved digital platforms such as the national open data portal (Commitments 2.1-2.4) and the e-municipality ("e-Komunat") portal (Commitment 1.2) were impacted by uneven technical and human capacities in government, as well as platform functionality issues. The two commitments identified as the most ambitious in the IRM Action Plan Review (Commitment 4.1 on public procurement transparency and Commitment 4.3 on political finance transparency) depended on the passage of legislation and did not move forward due to the absence of a functioning Parliament for most of the implementation period. Moreover, a prolonged gap in central coordination of the action plan limited implementation.

At a Glance

LEVEL OF COMPLETION

1/13 Complete or substantially complete commitments

EARLY RESULTS

1/13 Commitments with early results

0/13 Commitments with significant results

KEY OBSERVATIONS

- Kosovo's strong co-creation process did not continue into implementation due to the absence of an OGP infrastructure
- Political disruption narrowed space for governance reforms and led to implementation delays
- Technical improvements occurred, but often without a coherent strategy to deliver open government outcomes
- Civil society's contributions strengthened implementation beyond formal compliance with the commitment activities
- Ambitious reforms require feasible sequencing, especially for commitments that depend on passing legislation

Met the minimum requirements during implementation: No

Participation and Co-Creation

Kosovo co-created its first action plan through an inclusive process, with a multi-stakeholder forum (the National Coordinating Committee - NCC), multiple thematic workshops, public discussions, and an extended online consultation. Civil society widely reported that their inputs were reflected in the final plan, supported by an engaged Point of Contact during co-creation. In contrast, participation stalled during implementation. Kosovo operated for an extended period without an active point of contact at the Ministry of Local Government Administration (MLGA) after the plan's adoption, the NCC did not meet during implementation, and there was no systematic outreach or reporting to civil society. The dedicated OGP website, initially maintained by civil society, was not updated during implementation and remained non-functional even after technical transfer to the government, leaving no accessible repository of evidence or progress tracking. As a result, Kosovo did not meet the minimum requirements for implementation under the OGP Participation and Co-Creation Standards. In June 2025, the MLGA established a division dedicated to OGP, which led the process of designing the new Action Plan 2026-2028 and is expected to strengthen continuity of coordination, support more regular stakeholder dialogue, and improve public tracking and reporting of implementation.

Implementation in Context

Implementation took place amid a complex and volatile political environment in Kosovo. The 2024 context was shaped by heightened Kosovo-Serbia tensions, stalled international and EU-integration processes, and security-dominated public debate, which narrowed political attention for governance reforms. In 2025, recurrent elections and institutional paralysis further constrained reform delivery: prolonged delays in constituting the Parliament, a caretaker government with limited powers, and repeated election cycles reduced the space for inter-institutional coordination and sustained policy follow-through. These dynamics contributed to fragmented delivery of commitments across institutions and limiting opportunities for structured stakeholder monitoring and accountability.

Section I. Key Observations

The key observations below offer reflections from Kosovo's first action plan cycle. These lessons aim to support Kosovo's future action plans and broader open government journey.

Observation 1: Kosovo's strong co-creation process did not continue into implementation due to the absence of an OGP infrastructure

Kosovo's first OGP action plan started with strong momentum. Civil society stakeholders described the co-creation phase as open and inclusive, with an active multi-stakeholder forum, frequent meetings and consultations, and a perception that their inputs were reflected in the final plan.¹ This success was supported by a high level of personal dedication from the point of contact (PoC), who, as a political advisor, led Kosovo's OGP membership process and the co-creation of the first action plan.² However, the implementation phase did not build on this momentum. Shortly after the government adopted the action plan in December 2023, Kosovo operated for almost a year without a PoC until late 2024 (about half of the implementation phase). The multi-stakeholder forum did not convene during the implementation period (December 2023-December 2025). In addition, the MLGA did not update Kosovo's OGP website (developed by civil society during co-creation) during implementation, limiting the possibilities of monitoring the progress of commitments.³ Full institutional arrangements were completed by June 2025 through the creation of a dedicated OGP division within the MLGA.⁴

The first action plan cycle showed that Kosovo has the ability, across both government and civil society, to organize an inclusive and constructive OGP process. However, sustaining this approach requires embedding the OGP process in clear institutional structures, roles, and routines. Doing so would better protect action plan implementation from political disruptions and staff turnover in government institutions. Kosovo's second action plan for 2026–2028 responds to this by introducing a commitment on institutionalizing OGP structures and strengthening implementation discipline through coordination and monitoring.⁵

Observation 2: Political disruption narrowed space for governance reforms and led to implementation delays

Kosovo's action plan coincided with a period of political disruptions, including the freezing of Kosovo's Council of Europe membership bid in May 2024⁶ and a near-standstill in the EU-mediated dialogue between Kosovo and Serbia.⁷ The February 2025 parliamentary elections, scheduled well in advance, made political parties prioritize electoral strategies over policymaking from summer 2024, narrowing the space for open government reforms. Following the elections, the Assembly of the Republic of Kosovo failed to constitute itself,⁸ leading to a caretaker government between March 2025 and new parliamentary elections in December 2025.⁹ Local elections in autumn 2025 further shifted the attention of decision-makers and the public.¹⁰ This paralysis affected the OGP cycle, with a prolonged lack of implementation coordination. For future action plan cycles, OGP commitments could be embedded into annual work plans and budgets, to reduce the impact of similar political crisis. The IRM also recommends taking steps to institutionalize the work of the multi-stakeholder forum and the role of the PoC so that the OGP process is less impacted by political or institutional changes.

Observation 3: Technical improvements occurred, but often without a coherent strategy to deliver open government outcomes

Across the action plan, implementation delivered technical improvements to digital platforms but without making major changes to transparency, accountability, and responsiveness of these platforms. Commitment 1.1 illustrated this gap: while a dedicated “Grants and Subsidies” section was added to the e-Kosova platform and reported high usage, it did not integrate the full spectrum of government grants and subsidies. Also, it was limited to open calls, without public information on beneficiaries, implementation, or evaluation results.¹¹ Similarly, MLGA developed a wide set of new municipal modules in the e-Komunat platform (Commitment 1.2), but only a few functions were visible to the public or integrated into the work of municipal officers responsible for services (e.g., there are no recorded municipal reactions in key citizen-facing tools).¹² In public procurement (Commitment 4.1), interoperability upgrades did not deliver the commitment’s central goal of a “fully open” procurement data in machine-readable formats”.¹³ The recruitment of high-level officials (Commitment 4.2) benefited from having both a legal framework and a functional platform for recruitment in place before the action plan. However, important transparency elements (publishing panel voting and standardized justifications) and the planned integrity safeguard (systematic anti-corruption review) were not implemented as envisioned.¹⁴

Future OGP commitments that involve digital tools could start by assessing user needs (citizens, journalists, businesses), defining the outputs (who publishes what, when, in which format, for what purpose), and ensuring digital tools serve the goal of making government more transparent, accountable, and participatory. The IRM also recommends involving civil society in monitoring these platforms during implementation.

Observation 4: Civil society’s contributions strengthened implementation beyond formal compliance with the commitment activities

Despite a lack of central oversight and monitoring of action plan implementation, civil society provided inputs that helped advance some commitments. For the recruitment of high-level officials (Commitment 4.2), civil society monitoring reportedly helped identify irregularities and contributed to the cancellation of flawed procedures.¹⁵ In public consultations (Commitment 3.1), civil society supported the integration of consultation requirements into the Government’s Rules of Procedure, and their monitoring pointed to gaps between formal compliance (posting drafts) and substantive participation (quality of supporting documents, feedback to contributors, and consistent publication of final consultation reports).¹⁶ On strategic lawsuits against public participation (SLAPPs) under Commitment 3.2, civil society and international partners produced guidance materials and manuals, convened discussions, piloted trainings, and initiated coordination mechanisms, while reforms toward the EU’s Anti-SLAPP standards did not advance.¹⁷ In political party finance transparency (Commitment 4.3), civil society continued to monitor campaign spending during the 2025 election cycles and produced evidence pointing to increasingly complex (and largely online) campaign expenditures, including spending linked to candidates and some third-party advertising, despite limited institutional monitoring of party finances.¹⁸ These capacities could be integrated more effectively in future action plan cycles, through structured partnerships in co-delivering commitments, where there is shared interest and complementary expertise.

Observation 5: Ambitious reforms require feasible sequencing, especially for commitments that depend on passing legislation

Kosovo's first OGP cycle was an important institutional learning process around commitment design. Several commitments were designed as broad, multi-step reform packages (e.g., public procurement reform, transparency of high-level official recruitment, and wider e-services package). In practice, however, progress often concentrated on one or a few achievable milestones, while the larger governance and accountability components lagged. This resulted in isolated changes with limited systemic uptake (e.g., interoperability of the public procurement platform with the public finance management system, the HR management platform, or a grants section with a limited number of individual online application instances), rather than end-to-end reforms that improved openness and accountability.

Several of the most ambitious commitments relied on passing laws or legal amendments as a prerequisite for implementation, most notably on public procurement (Commitment 4.1) and political party finance transparency (Commitment 4.3), and partially in anti-SLAPP alignment with EU Directives (Commitment 3.2). During most of the implementation period, Kosovo operated in a constrained political and institutional environment, including extended periods of limited parliamentary functionality and a caretaker government. As a result, commitments that depended on legal reform were less likely to progress. Going forward, Kosovo can remain ambitious while also better sequencing reforms, either by making commitments part of clear legislative pathways and timelines, or by pairing legal reforms with parallel, implementable steps that can be implemented even if legislation is delayed.

Kosovo appears to be applying some of these lessons already. The second action plan for 2026–2028 focuses more on practicality, reducing the number of commitments to four strategic areas and one additional process-focused commitment.¹⁹ It also ensures continuity in selected areas, such as local-level digital governance and citizen participation through the e-Komunat platform, and efforts to improve access to information and standardize open data and proactive publication.

¹ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026; Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026; Valmir Gashi (Kosovo Local Government Institute – KLGI), interview by the IRM, 31 March 2026.

² Fidan Kalaja (ex-Point of Contact for Kosovo during the co-creation process), interview by the IRM, 30 March 2026.

³ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026; Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026.

⁴ Flurim Arifi (Ministry of Local Government Administration – MLGA and OGP Point of Contact for Kosovo), interview by the IRM, 24 March 2026.

⁵ Open Government Partnership, Kosovo National Action Plan 2026–2028, https://www.opengovpartnership.org/wp-content/uploads/2026/04/Kosovo_Action-Plan_2026%E2%80%932028_EN.pdf

⁶ Euronews, Why the green light for Kosovo joining the Council of Europe is likely to be delayed, 9 May 2024, <https://www.euronews.com/2024/05/09/why-the-green-light-for-kosovo-joining-the-council-of-europe-is-likely-to-be-delayed>

⁷ Gentiana Paçarizi - Kosovo 2.0, Where is the dialogue heading, 14 April 2026, <https://kosovotwopointzero.com/en/where-is-the-dialogue-heading>

⁸ Radio Free Europe, Kosovo Faces Deepening Political Crisis After 21 Failed Attempts To Elect Speaker, 26 May 2025, <https://www.rferl.org/a/kurti-kosovo-speaker-parliament-bajrami-haxhiu/33423764.html>

⁹ Reuters, Kosovo president sets December 28 as date for snap vote, 20 November 2025, <https://www.reuters.com/world/kosovo-president-sets-dec-28-date-snap-vote-2025-11-20/>

¹⁰ President of Kosovo, President Osmani has set October 12th, 2025 as the date of holding of regular local elections, 9 June 2025, <https://president-ksgov.net/en/president-osmani-has-set-october-12th-2025-as-the-date-of-holding-of-regular-local-elections/>

¹¹ See below Annex I: Commitment 1.1: E-services web portal for Kosovo (eKosova)

¹² See below Annex I: Commitment 1.2: Integrate new module (eMunicipalities) within eKosova in order to digitize all municipal services

¹³ See below Annex I: Commitment 4.1: Fully open public procurement system

¹⁴ See below Annex I: Commitment 4.2: Transparent recruitment of high-level officials

¹⁵ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.

¹⁶ Dren Puka (Kosovar Civil Society Foundation (KCSF)), interview by the IRM, 31 March 2026.

¹⁷ Burbuqe Kastrati (Fol Movement), interview by the IRM, 1 April 2026.

¹⁸ Eugen Cakolli (Kosovo Democratic Institute – KDI), interview by the IRM, 1 April 2026.

¹⁹ Open Government Partnership Kosovo, Kosovo's OGP Action Plan 2026-2028, March 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/04/Kosovo_Action-Plan_2026%E2%80%932028_EN.pdf

Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments’ objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

Table 1. Commitments with Early Results

Commitment 4.2: This commitment led to a new legal framework and a central human resources management platform contributed to a more standardized recruitment process, with public vacancy announcements and online applications.

Commitment 4.2: Transparent recruitment of high-level officials

Implementers: Ministry of Internal Affairs (MIA)
Supporting stakeholders: Parliament, Parliamentary Committees, Anti-Corruption Agency, Civil society organizations

Context and Objectives

Kosovo’s public administration reform agenda has repeatedly flagged weaknesses in merit-based and transparent recruitment in the government, especially for senior/managerial posts. The Law on Public Officials of 2020 has not been effectively implemented, with no centralized merit-based recruitment system, an extensive use of acting positions particularly at senior managerial levels, and ineffective external recruitment procedures. Although the public could access some information on the recruitment process, the transparency and human resource management (HRM) systems remained weak.¹

Commitment 4.2 aimed to strengthen openness and integrity in recruitment for high state positions. The commitment entailed standardizing and unifying recruitment procedures, developing a functional online recruitment platform, and publishing interviewing panel voting and requiring written justifications for scoring. The commitment also envisaged an added integrity safeguard by sending the list of formally eligible candidates to the Anti-Corruption Agency for a legal opinion on potential conflicts of interest—aiming to make recruitment processes more transparent, accountable, and resilient to politicization risks identified in prior reform assessments.

Early Results: Moderate Results

Evidence points to this commitment having moderate early results in opening government. The new Law on Public Officials² applicable since September 2023 and the deriving regulation on admission in the civil service³ provide a standardized legal and regulatory framework for recruiting high-level state positions. The recruitment is supported by the central HR information system (HRMIS/SIMBNJ) for publishing vacancies, enabling online applications, and managing all stages of the process.⁴ During 2024-2025, recruitment procedures were decentralized for a transitional period after the new law entered into force, with the HR units of institutions managing recruitment processes.⁵ However, decentralization was marked by inefficiency and

widespread reliance on acting appointments, delaying the completion of recruiting processes.⁶ The system returned to a centralized model in March 2025.⁷ The Support for Improvement in Governance and Management (SIGMA) notes that the mandate of the Department for the Management of Public Officials (DMPO) of the Ministry of Internal Affairs has been curtailed by a decision of the Constitutional Court, depriving it of the right to request and receive information relevant for the execution of its duties and of its function to supervise legislation implementation.⁸ Given the central coordinating role of DMPO in the recruitment of high-level officials, this decision may have negatively impacted the implementation of this commitment.

The legal framework requires that all high-level officials are recruited through a unified procedure, based on an open vacancy, a two-phased evaluation system, and an ad-hoc recruiting committee. Public information on the results was made available in the HRMIS/SIMBNJ platform. The opening of these positions to external candidates marks the first structured effort in Kosovo to increase competition and attract new professionals into the civil service. However, civil society reports that this change has not led to a substantial increase in the number of applicants, nor to the selection of external candidates for senior positions.⁹ On the other hand, there are implementation challenges and transparency gaps. The European Commission Country Report 2025 highlights that the merit-based recruitment system remains inefficient and delayed, with many acting appointments at high and mid-management levels undermining stability, while raising concerns about politicization, limited career progression, and civil service stability.¹⁰ Civil society stresses the need for stronger planning, improved written-test question banks, and continuous training and standardization for ad-hoc recruiting committees.¹¹ The most notable concern is related to the widespread occurrence of acting appointments in senior management positions: according to government reports on human resources, during 2024 72 percent of senior management positions were filled by acting appointments.¹² According to civil society reports, a similar rate has continued during 2025 due to failure to open the job vacancy, lack of qualified candidates or lack of candidates in general, or cancellation of recruitment processes due to legality issues.¹³ In addition, civil society noted that 2025 saw limited recruitment activity linked to a caretaker government, prolonging reliance on acting officials and slowing reforms in practice.¹⁴

By 2024, HRMIS/SIMBNJ was fully functional with relevant data published, including the open vacancy, the results of the preliminary verification, the results of the final assessment, and formal notifications on shortlisted candidates, any change to the timelines of the process, and final decisions.¹⁵ The government emphasizes anonymity in the written test and publication of final winner lists and outcomes through HRMIS/SIMBNJ.¹⁶ However, according to civil society, transparency is constrained because candidate names are replaced by system-generated codes, and only total scores are published rather than the individual scoring of each panel member. Civil society further notes the absence of a unified format for written justification of awarded points, which creates inconsistencies in practice.¹⁷ These constraints suggest the commitment has resulted in moderate changes to transparency compared to the situation before the action plan (December 2023).

The legal framework also gave civil society organizations (CSOs) and labor unions the right to monitor recruitment procedures. In practice, CSOs are generally allowed to observe these processes, sometimes through invitations from institutions, although isolated cases were reported where monitoring was not permitted at any stage.¹⁸ Between February 2024 and February 2025, a civil society coalition monitored 48 recruitment procedures for high-level

positions and reported that its oversight contributed to improving these processes, including the cancellation of eight procedures due to identified irregularities.¹⁹

While the Law on Public Officials determines that the integrity of the candidates for high-level positions is an essential condition, there is no mandatory, proactive mechanism requiring the Anti-Corruption Agency to issue conflict-of-interest opinions for eligible candidate lists. Nevertheless, institutions may request opinions on a case-by-case basis, and some bodies reportedly do so regularly (e.g., judicial/prosecutorial councils).²⁰

Overall, Kosovo has developed a more consolidated legal framework and a functional online portal for publishing vacancies and managing applications. However, the commitment has yet to deliver significant results in transparency of selection decisions or the planned integrity check. Moreover, the broader high reliance on acting appointments has limited tangible early results for accountability and public trust.

Looking Ahead

Although Kosovo's second action plan for 2026–2028 does not include a commitment on recruitment for high state positions, this area remains relevant for open government principles. Building on the existing legal framework and the functioning platform, the IRM recommends the Government of Kosovo and the recently established Ministry of Digitalization and Public Administration consider the following steps:

- **Close the transparency gap in HRMIS/SIMBNJ** by publishing (at minimum) panel member scoring components and requiring standardized written justifications for points awarded, integrated as mandatory fields/templates within the platform.
- **Institutionalize the integrity safeguard** by establishing a clear, mandatory step for requesting an Anti-Corruption Agency opinion for conflict-of-interest risks for candidate lists that pass formal eligibility checks (starting with the highest-risk/top roles), or integrating the HRMIS/SIMBNJ with Anti-Corruption Agency systems for risk flagging based on a carefully defined set of integrity indicators.
- **Strengthen central guidance and oversight** of senior recruitment by ensuring that the responsible central body has the full mandate and capacity to request and receive necessary information, monitor compliance, and intervene when procedures are delayed or repeatedly annulled. This is especially important given the high rate of acting senior appointments and constraints on central oversight functions.
- **Professionalize selection committees and tools** through continuous training and standardization for ad-hoc committees (including interview protocols), and by maintaining a robust written-test question bank to reduce errors and inconsistencies across procedures.
- **Broaden engagement with civil society** beyond ad-hoc consultation toward systematic involvement in reform design and independent monitoring. This could include making CSOs permanent observers across all recruitment phases, creating clear channels for reporting irregularities and follow-up, and regularly publishing aggregated monitoring findings and corrective actions. To enable this on a scale, relevant institutions could establish dedicated financial support to cover the costs of monitoring all high-level recruitment processes (e.g., through transparent, competitive grants from a dedicated budget line), coupled with safeguards to protect independence and prevent any influence on monitoring findings or recruitment outcomes.

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- ¹ European Commission, EU Country Report Kosovo 2023, https://enlargement.ec.europa.eu/kosovo-report-2023_en
- ² Official Gazette of the Republic of Kosovo, Law No.08/L-197 on public officials of 18 September 2023, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=81430>
- ³ Official Gazette of the Republic of Kosovo, Regulation (GRK) - No.07/2025 on admission procedure in the civil service of 9 January 2026, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=115096>
- ⁴ Human Resources Management Information System – HRMIS, konkursi.rks-gov.net
- ⁵ Arlinda Kamberaj (Ministry of Digitalization and Public Administration – MDPA), correspondence with the IRM, 8 April 2026.
- ⁶ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ⁷ Arlinda Kamberaj (Ministry of Digitalization and Public Administration – MDPA), correspondence with the IRM, 8 April 2026.
- ⁸ SIGMA – OECD, Public administration in Kosovo 2024, Assessment against the Principles of Public Administration, 2025, https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/01/public-administration-in-kosovo-2024_d9378da9/a53fce6b-en.pdf
- ⁹ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ¹⁰ European Commission, Country Report for Kosovo 2025, 4 November 2025, https://enlargement.ec.europa.eu/kosovo-report-2025_en
- ¹¹ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ¹² Ministry of Internal Affairs, Human Resources Management Report 2024, September 2025, <https://mpb.rks-gov.net/Uploads/Documents/Pdf/EN/9318/ang.%20Raporti%20p%C3%ABr%20Menaxhimin%20e%20Burimeve%20Njer%C3%ABzore%202024%20Shtator%202025.pdf>
- ¹³ Group for Legal and Political Studies – GLPS, Acting Appointments: From Phenomenon to Abuse, Policy Brief, January 2026, <https://legalpoliticalstudies.org/wp-content/uploads/2026/01/GLPS-Policy-Brief-Acting-Appointments-from-phenomenon-to-abuse.pdf>
- ¹⁴ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ¹⁵ Human Resources Management Information System – HRMIS, konkursi.rks-gov.net
- ¹⁶ Arlinda Kamberaj (Ministry of Digitalization and Public Administration – MDPA), correspondence with the IRM, 8 April 2026.
- ¹⁷ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ¹⁸ Ema Pula (Group for Legal and Political Studies – GLPS), interview by the IRM, 3 April 2026.
- ¹⁹ Group for Legal and Political Studies - GLPS, GAP Institute and Institute for Development Policies – INDEP, Corrwatwatch Annual Report February 2024 – February 2025, March 2025, <https://corrwatwatch.org/wp-content/uploads/2025/03/Annual-Report-24-25-SHQ.pdf>
- ²⁰ Yll Buleshkaj (Anti-Corruption Agency – ACA), interview by the IRM, 3 April 2026.

Section III. Participation and Co-Creation

Kosovo's 2023–2025 action plan was developed by active civil society participation through working meetings, thematic workshops, and public discussions, alongside the multi-stakeholder forum (the National Coordinating Committee - NCC). In contrast, participation during implementation stalled, with no meetings of the NCC and no information sent to or involvement of civil society.

The Ministry of Local Government Administration (MLGA) leads Kosovo's OGP process, both at the political level through the Minister, and at the technical level through the point of contact (PoC). During the co-creation phase, the PoC was a political advisor to the Minister, who led both Kosovo's application for OGP membership and the co-creation process for the action plan.¹ Following the approval of the action plan in December 2023, there was no PoC for almost one year. In November 2024, a new PoC was appointed from the ranks of senior civil servants. Full institutional arrangements were finalized by June 2025, with the creation of a division dedicated to OGP within the Department for Digitalization of Municipal Services in the MLGA.² The mandate of the MLGA to establish and lead the NCC for the implementation phase was reconfirmed by the government in December 2023,³ on the same day of the adoption of the final action plan. However, the NCC did not meet throughout the implementation period. A new multi-stakeholder forum, the National Open Government Forum, was established in late 2025.⁴ This forum met several times during late 2025 and early 2026 for the co-creation of the second action plan (2026-2028), which was finalized in March 2026.

A dedicated website (ogpkosovo.org) was developed and managed on a voluntary basis by the NGO Open Data Kosovo (ODK),⁵ and served as a key information source during the co-creation period.⁶ During the implementation period, the website was not updated with information and evidence on the status of commitments.⁷ In 2025, the source code and full access for technical administration and maintenance was transferred to the MLGA, but the website remains non-functional as of April 2026.⁸ There was no alternative repository for access to implementation documentation, nor any public communication on progress via other channels.

Interviewees from civil society and the government suggested that the format of collaboration improved in the second action plan for 2026–2028, with earlier engagement, clearer structure (including work in smaller thematic groups), and more systematic feedback, reflecting lessons learned from the 2023–2025 cycle.

Action Plan Co-Creation

As pointed out in the IRM Action Plan Review, the development of Kosovo's 2023-2025 action plan actively involved civil society. Kosovo started co-creation of its first action plan ahead of its formal membership of OGP. The NCC held its inaugural meeting in October 2021,⁹ and was comprised of majority membership from civil society. The co-creation included an initial two-month consultation period during 2022 that consisted of 11 NCC meetings, four thematic workshops, and seven public discussions in Kosovo's main regional centres.¹⁰ Following a March 2023 decision by the OGP Steering Committee enabling non-UN member states to join OGP as non-voting members, Kosovo finalized key preparatory steps to enter the partnership, including meeting the technical eligibility criteria, passing the Values Check, and preparing the final action plan. Kosovo submitted its letter of interest on 17 July 2023 and was welcomed as an OGP

member on 31 July 2023. After Kosovo's eligibility was confirmed, the MLGA organized an additional round of consultations from May to July 2023.¹¹ Civil society representatives confirm that their inputs were taken into account and adequately reflected in the final draft of the action plan, while noting a positive attitude from the PoC during the co-creation process.¹² The action plan was approved by the Government of Kosovo on 13 December 2023.¹³

Participation During Implementation

Following the adoption of the action plan, there was a prolonged lack of government coordination over the OGP process. This was primarily due to a prolonged period with no designated lead, as well as political developments related to successive election cycles during 2025. As a result, there was no information published on the progress of commitments, and the NCC did not meet.¹⁴ The MLGA confirms lack of coordination with civil society or meetings of the NCC. The implementation process and cooperation with civil society was not coordinated from a central authority, rather fragmented in various line ministries and other institutions. Toward the end of the implementation period, the focus of the PoC and the OGP Division shifted to the co-creation process of the second action plan for 2026-2028, which started in October 2025 and concluded by March 2026.¹⁵

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.¹⁶ Countries are encouraged to aim for the full ambition of the standards and to comply with the minimum requirements under each standard.¹⁷

Table 2. Compliance with Minimum Requirements

Minimum requirement	Co-creation	Implementation
1.1 Space for dialogue: The National Coordination Committee (NCC) was founded in July 2021¹⁸ and held its inaugural meeting in October 2021.¹⁹ The NCC met 11 times during the co-creation of the 2023-2025 action plan, including four thematic workshops and seven public discussions in Kosovo's main regional centres.²⁰ As noted in the APR, the MLGA PoC's background in civil society helped facilitate a highly open and participatory co-creation process,²¹ and this was confirmed by many civil society interviewees. Following the adoption of the action plan in December 2023, the NCC did not meet throughout the entire implementation phase, and civil society was not engaged in implementation discussions.²² A new multi-stakeholder forum, the National Open Government Forum, was established in late 2025. This forum met several times during late 2025 and early 2026 for the co-creation of the second action plan (2026-2028). Minimum requirement 1.1 states that OGP countries should have a space for ongoing dialogue with participation from government and civil society that meets at least every six months throughout the action plan cycle. Since Kosovo's space for dialogue (the NCC) did not meet at least every sixth months during the	Yes	No

implementation phase (December 2023-December 2025), the IRM assesses the minimum requirement as not met.		
2.1 OGP website: A dedicated website (ogpkosovo.org) was developed during co-creation and contained the action plan 2023-2025 and information on the OGP process. ²³ The website was non-functional throughout most of the implementation period, and was not updated with information and evidence on the progress of the commitments. ²⁴	Yes	No
2.2 Repository: During the co-creation phase, ogpkosovo.org held various materials about the co-creation process, including the composition of the NCC, co-creation documents, and various drafts of the action plan. ²⁵ As of December 2023, when the action plan was adopted, the last update to this section was from 26 July 2022. Also, no NCC minutes were identified. ²⁶ During implementation, this website was not maintained and became non-functional.	No	No
3.1 Advanced notice: See the Action Plan Review ²⁷	No	Not applicable
3.2 Outreach: See the Action Plan Review	Yes	Not applicable
3.3 Feedback mechanism: See the Action Plan Review	Yes	Not applicable
4.1 Reasoned response: See the Action Plan Review	No	Not applicable
5.1 Open implementation: The NCC did not meet during the implementation period, and there was no other coordinated engagement with civil society in implementation discussions. For several commitments, there were instances of ad-hoc civil society engagement in line ministries and other institutions. Minimum requirement 5.1 requires OGP countries to hold at least two meetings every year with civil society to present results on the implementation of the action plan and collect comments. As these meetings did not occur during implementation of Kosovo's 2023-2025 action plan, the IRM assesses that Kosovo did not meet this requirement.	Not applicable	No

¹ Fidan Kalaja (ex-Point of Contact for Kosovo during the co-creation process), interview by the IRM, 30 March 2026.

² Flurim Arifi (Ministry of Local Government Administration – MLGA and OGP Point of Contact for Kosovo), interview by the IRM, 24 March 2026.

³ Official Gazette of the Republic of Kosovo, Government of Kosovo Decision 21/178 dated 13 December 2023, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=84703>

⁴ Open Government Partnership Kosovo, Kosovo's OGP Action Plan 2026-2028, March 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/04/Kosovo_Action-Plan_2026%E2%80%932028_EN.pdf

⁵ Fidan Kalaja (ex-Point of Contact for Kosovo during the co-creation process), interview by the IRM, 30 March 2026.

⁶ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026.

⁷ Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026.

⁸ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026.

⁹ Ministry of Local Government Administration (MLGA), Inauguration of the National Coordinating Committee within the Open Government Partnership, 29 October 2021, <https://bit.ly/3HKRjnK>

¹⁰ Fidan Kalaja (ex-Point of Contact for Kosovo during the co-creation process), interview by the IRM, 30 March 2026.

¹¹ Open Government Partnership, Kosovo's Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>

¹² Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026; Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026; Valmir Gashi (Kosovo Local Government Institute – KLGI), interview by the IRM, 31 March 2026.

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- ¹³ Official Gazette of the Republic of Kosovo, Government of Kosovo Decision 21/178 dated 13 December 2023, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=84703>
- ¹⁴ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026; Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026; Burbuqe Kastrati (Fol Movement), interview by the IRM, 1 April 2026.
- ¹⁵ Open Government Partnership Kosovo, Kosovo’s OGP Action Plan 2026-2028, March 2026, https://www.opengovpartnership.org/wp-content/uploads/2026/04/Kosovo_Action-Plan_2026%E2%80%932028_EN.pdf
- ¹⁶ Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>
- ¹⁷ Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements, 2022, https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf
- ¹⁸ Open Government Partnership, Kosovo’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>
- ¹⁹ Ministry of Local Government Administration (MLGA), Inauguration of the National Coordinating Committee within the Open Government Partnership, 29 October 2021, <https://bit.ly/3HKRjnK>
- ²⁰ Fidan Kalaja (ex-Point of Contact for Kosovo during the co-creation process), interview by the IRM, 30 March 2026.
- ²¹ Open Government Partnership, Kosovo’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>
- ²² Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026; Diana Metushi Krasniqi (Kosovo Democratic Institute – KDI), interview by the IRM, 6 April 2026; Burbuqe Kastrati (Fol Movement), interview by the IRM, 1 April 2026.
- ²³ Open Government Partnership, Kosovo’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>
- ²⁴ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026.
- ²⁵ Blerta Thaçi (Open Data Kosovo – ODK), interview by the IRM, 25 March 2026.
- ²⁶ Open Government Partnership, Kosovo’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>
- ²⁷ Open Government Partnership, Kosovo’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>

Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.¹

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

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.² The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector,
 - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
 - improving practices, policies, or institutions governing a policy area or within the public sector, or
 - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Taulant Hoxha and was reviewed by German Emanuelle, IRM external expert. The IRM methodology, quality of IRM products, and review process are overseen by the IRM's International Experts Panel (IEP).³ For more information, refer to the IRM webpage⁴ or the glossary of IRM and OGP terms.⁵

¹ For definitions of OGP terms, such as co-creation and promising commitments, see OGP Glossary, <https://www.opengovpartnership.org/glossary/>

² The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

³ Open Government Partnership, Independent Reporting Mechanism, International Experts Panel, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>

⁴ Open Government Partnership, IRM Overview, <https://www.opengovpartnership.org/irm-guidance-overview/>

⁵ Open Government Partnership, OGP Glossary, <https://www.opengovpartnership.org/glossary/>

Annex I. Commitment Data¹

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

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|--|--|

Commitment 1.1 sought to develop a dedicated section on the e-Kosova platform to digitize processes for the provision of grants and subsidies. Planned milestones focused on drafting and adopting a specific Administrative Instruction on the digitalization of grants and subsidies, creating a relevant grants application section in e-Kosova, and strengthening the capacities of public officials to use these tools.

Completion was limited. No Administrative Instruction or other relevant legal act was drafted or approved. However, a dedicated "Grants and Subsidies" section was created within e-Kosova, enabling partial integration of selected grant and subsidy schemes.² These integrated schemes are largely led by central-level institutions and include subsidies for electricity bills for vulnerable consumers (a 2024 government program), subsidies for the purchase of school textbooks through the Ministry of Education,³ grants administered by the Kosovo Investment and Enterprise Support Agency,⁴ and several energy-efficiency measures implemented by the Kosovo Energy Efficiency Fund⁵ and the Ministry of Economy.⁶ According to information shared by the Government of Kosovo, the Grants and Subsidies section recorded 411,000 instances when these e-services were requested or accessed by users. Across these schemes, e-Kosova primarily enabled online application, while no public information was provided on the implementation of awarded grants and subsidies, the list of beneficiaries, or evaluation reports. In addition, there was no information available on any capacity-building program for public officials related to the use of the e-Kosova grants and subsidies tool. However, important providers of state grants and subsidies, such as the Ministry of Agriculture, Ministry of Culture, Youth and Sports, and all Municipalities, continue to provide grants through their own separate platforms and processes.

Taken together, the commitment shows limited and fragmented completion and has not yet generated notable early results.

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

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|--|--|

Commitment 1.2 aimed to integrate a new "e-Municipalities" (e-Komunat) module within the e-Kosova portal. Planned milestones focused on digitizing 50 municipal services through e-Komunat, including the necessary policy and operational processes for such digitalization, and training and capacity building for municipal staff to ensure effective implementation and use.

Overall, the completion was limited. The Ministry of Local Government Administration (MLGA) launched e-Komunat in May 2024, which is currently in its third phase of implementation. The e-services were developed in the first two phases: the first phase was managed by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ) and the second was managed by the MLGA, with external companies contracted to develop the platform. So far, it consists of 10 modules of municipal e-services: 1) direct broadcasting of the meetings of the Municipal Assembly; 2) Report problems in your municipality; 3) Get in touch with the municipal officer; 4) Initiate and contribute in public debates in your municipality; 5) Permits and procedures in Prizren Municipality; 6) Permits and procedures in Lipjan Municipality; 7) Municipal Grants and Subsidies; 8) Municipal Taxes Register; 9) Capital Investment Register; 10) Register of the Municipal Immovable Property.

While there was no specific Concept Document on e-Komunat, the design of the e-services was based on the Initiating Document, which includes all requirements for the development of e-Komunat, including justification, phases and timeline, design and functional requirements, and eligibility criteria for the contracted company.⁷ The platform began as a pilot in three municipalities (Prishtina, South Mitrovica, and Gjilan), with plans to extend to all municipalities. The selection of pilot municipalities was carried out in consultation with the Association of Kosovo Municipalities (through the collegium of IT officers), and initial meetings were held with the pilot municipalities to collect inputs for specific modules. By the end of the implementation period, all 10 service areas had been developed,⁸ but only a few of them are available to the public and functional: 1) broadcasts of Municipal Assembly meetings of a few municipalities,⁹ with the most recent broadcasts being from 2024; 2) report problems to your municipality,¹⁰ and 3) communicate with municipal official¹¹ with fully functional platforms for both but no cases of any response from respective municipalities or municipal officers;¹² 4) Permits and procedures in Prizren Municipality,¹³ and 5) Permits and procedures in Lipjan Municipality;¹⁴ 6) the register of municipal taxes in the three pilot municipalities,¹⁵ with limited public information available in the platform; and 7) list of municipal immovable properties in the three pilot municipalities.¹⁶ Some services are not available on the platform, including monitoring the status of municipal act review processes, initiating petitions, participation in public debates, and participation in setting municipal priorities. Government reporting and interviews highlight that the varying technical capacities and human resources in the municipalities affected the pace and consistency of roll-out.

Regarding capacity building, a training with MLGA staff was held in 2025, followed by a more extensive training for municipal officers on 17–18 December 2025 in Pejë, organized in cooperation with the OSCE and the Association of Kosovo Municipalities. No formal needs assessment was documented. Instead, some needs were reportedly identified during the December 2025 training with municipal staff.

Overall, the commitment shows limited completion and has not yet generated notable early results.

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

• Verifiable: Yes	• Completion: Not started
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• Does it have an open government lens? Yes • Potential for results: Modest	• Early results: No Notable Results
Commitment 1.3 aimed to develop a dedicated application for citizens to register damage caused by natural disasters, with a particular emphasis on farmers. Available evidence indicates that this commitment was not started during the implementation period. Reporting and assessment of damages from natural disasters is conducted in line with the procedures¹⁷ set out in the 2015 Regulation on the methodology for damage assessment from natural and other disasters,¹⁸ which does not provide for an online reporting system. Verification related to the January 2026 floods confirms that affected citizens were instructed to submit applications in person, in hard copy, to the relevant municipal offices.¹⁹ Given the lack of progress, no early results were observed.	
Commitment 2.1: Publication of government data through Open Data Portal	
• Verifiable: Yes • Does it have an open government lens? Yes • This commitment has been clustered as: Open Data (Commitments 2.1-2.4 of the action plan) • Potential for results: Modest	• Completion: Not started • Early results: No Notable Results
Commitment 2.1 sought to improve the procedures within public institutions for preparing, standardizing, and publishing datasets on institutional websites and the Open Data Portal. Planned milestones included establishing a National Strategic Council to monitor and steer implementation of the Open Data Charter in the Republic of Kosovo, setting up an inter-institutional working group to coordinate implementation across institutions, and defining deadlines for ministries and departments to publish relevant data. The available evidence suggests that no activities envisaged in this commitment were started during the implementation period. There were no attempts to establish either the National Strategic Council or an inter-institutional working group for coordinating the implementation of the Open Data Charter in the Republic of Kosovo. The Open Data Portal was developed in 2016-2017 by Open Data Kosovo,²⁰ a civic-tech NGO. Since its launch, the portal has faced functionality issues, inconsistent accessibility, and limited and irregular publication of data.²¹ The portal was non-functional during significant periods of time, including at the time of research for this report. According to a civil society activist, when last functional during autumn 2025, the portal allegedly had 205 datasets, mostly from the Hydrogeological Institute and the Ministry of Health, and some from the Ministry of Finance.²² Even when the portal was functional, the publication of datasets was fragmented and lacked any institutional coordination.²³ There is no information on any plan to return the functionality of the portal, increase the number of published datasets, or improve the quality and usability of the data. Given the lack of progress, no early results were observed.	

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

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment has been clustered as: Open Data (Commitments 2.1-2.4 of the action plan) • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: No Evidence Available • Early results: No Notable Results |
|---|--|

Commitment 2.2 aimed to increase the number of datasets published on the Open Data Portal by 30 percent. Planned milestones focused on having public institutions identify missing datasets, setting clear priorities for data publication across institutions, and uploading these missing datasets.

There is no information on any initiative to identify missing datasets, or whether any new databases were published during the implementation period. As mentioned under Commitment 2.1, the portal was non-functional during significant periods of time, including at the time of research for this report. According to the CSOs that used the portal when it was accessible, some new datasets during the reporting period were published, in particular from the Ministry of Finance.²⁴ However, due to non-functionality of the portal and lack of response from public institutions responsible for the portal, the IRM could not verify such claims.

Given the lack of information on implementation, no early results were observed.

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

- | | |
|---|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment has been clustered as: Open Data (Commitments 2.1-2.4 of the action plan) • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: No Evidence Available • Early results: No Notable Results |
|---|--|

Commitment 2.3 aimed to provide technical assistance and increase the understanding and capacity of public officials on publishing open data. There is no information on whether any technical assistance support was provided to any public official engaged in publishing datasets to the open data portal. Given the lack of information on implementation, no early results were observed.

Commitment 2.4: Raise awareness about the importance of open data

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • This commitment has been clustered | <ul style="list-style-type: none"> • Completion: No Evidence Available • Early results: No Notable Results |
|--|--|

as: Open Data (Commitments 2.1-2.4 of the action plan) • Potential for results: Modest	
Commitment 2.4 aimed to raise awareness on the importance of open data among public institutions, civil society, the media, and citizens. Planned milestones focused on organizing open data events, increasing the share of information and official documents published proactively, and conceiving, designing, and distributing brochures and other public-facing informational materials to help citizens better understand the value and use of open data. There is no information on events, brochures, or any other public-facing activities or materials organized or distributed to help citizens better understand the value and use of open data. Given the lack of information on implementation, no early results were observed.	
Commitment 3.1: Improving existing platforms for citizen participation in decision-making	
• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest	• Completion: Limited • Early results: No Notable Results
Commitment 3.1 sought to strengthen existing platforms for citizen participation in decision-making. Planned milestones included establishing mechanisms to supervise implementation of the Administrative Instruction on Minimum Standards of Public Consultations in Municipalities, establishing mechanisms to oversee implementation of the Regulation on minimum standards for the public consultation process, and organizing capacity-building events for public officials to support consistent application of these standards and improve the quality of public participation across institutions. Available evidence shows limited completion. The former Administrative Instruction on Minimum Standards for Public Consultations has been incorporated into the Administrative Instruction on Open Administration in Municipalities, with amendments to previously contested provisions, which the MLGA says has improved its practical applicability in municipalities.²⁵ Aside from the legal mandate of the Division for Transparency in Municipalities to promote local governance transparency and accountability,²⁶ there was no new implementation supervision mechanism. The MLGA assesses that this framework enables active citizen involvement in local decision-making and points to a generally positive transparency trend in 2024–2025, including municipalities increasingly drafting public consultation plans and publishing notifications, draft proposals, and consultation reports. In this period, the MLGA shared with municipalities several model documents, including a model transparency action plan, a draft transparency regulation, a draft annual consultation report template, and a participatory budgeting manual. However, CSOs working on citizen participation at the local level emphasize that, despite a formal legal framework requiring municipal annual reporting, ministry-level monitoring, and performance-management monitoring, such monitoring remains weak and uneven: KLGİ's monitoring of 28 municipalities in 2024 found public consultation reports available in only 17 municipalities (61 percent), while a different source that monitors performance data suggests an even lower	

rate of 32.95 percent across 34 municipalities.²⁷ Public consultation processes at the local level have been integrated both within the central Online Platform for Public Consultation²⁸ and the respective Annual Report,²⁹ but still not in a comprehensive and systematic way. Civil society further notes that the public consultation platform was largely non-functional for much of 2024, that consultations at the local level often remain formal, and its monitoring has been a fragmented administrative one rather than a robust and functional accountability mechanism.³⁰

At the central level, in 2024 the Regulation on Minimum Standards on Public Consultation³¹ was integrated within the new Rules of Procedures of the Government,³² in close cooperation between the Office of Prime Minister and civil society, and fully carrying over existing requirements and strengthening the obligation to publish final consultation reports.³³ According to government data, central-level institutions published 259 documents for public consultation in 2024; only 52 of these received public input (170 comments in total), and 57 percent were accompanied by a final consultation report.³⁴ However, civil society assesses that public consultation at the central level remains largely formal, with written online consultation, often conducted at the final stages of policy-making, remaining almost the only channel for public engagement. This narrows meaningful participation to a small number of well-established organizations with the capacity to review complex drafts and submit inputs within short timeframes.³⁵ In addition, functionality problems and prolonged periods of inaccessibility have significantly reduced the effective use of the Online Platform for Public Consultation as a citizen-participation tool, despite the Office of Good Governance reporting that an external expert has been contracted to improve the platform.

On capacity building, there was no regular training program for public officials at central or local level on public consultation process. However, during the reporting period there have been several trainings and other capacity-building workshops organized with support of international organizations and civil society, including OSCE-supported workshops/roundtables addressing platform functionality, integration with municipal websites, and digital transparency challenges,³⁶ a two-day training for municipal public communication officers organized by the DEMOS project, and KLG I working sessions and discussions linked to its monitoring reports.³⁷ Additionally, NGOs organized regular training programs on public consultation for civil society representatives.³⁸

Overall, the commitment shows limited completion and has not yet generated notable early results.

Commitment 3.2: Campaigns to prevent the proliferation of strategic lawsuits against public participation (SLAPPs)

- | | |
|--|---|
| <ul style="list-style-type: none">• Verifiable: Yes• Does it have an open government lens? Yes• Potential for results: Modest | <ul style="list-style-type: none">• Completion: Limited• Early results: No Notable Results |
|--|---|

Commitment 3.2 sought to prevent the proliferation of strategic lawsuits against public participation (SLAPPs). Planned milestones included adopting and aligning with the upcoming EU Anti-SLAPP Directive, ensuring participation of relevant institutions in roundtables and

conferences addressing SLAPP risks and responses, and providing support to CSOs to design and implement anti-SLAPP campaigns.

Progress was limited. During the reporting period there is no evidence of any official initiative by the Government of Kosovo to transpose the EU Anti-SLAPP Directive into domestic law. According to civil society, Kosovo does not meet core standards set by the EU’s Anti-SLAPP Directive:³⁹ there is no consolidated system for collecting and publishing SLAPP data, no specific discouraging sanctions for SLAPP initiators, and no clear legal mechanisms for early dismissal.⁴⁰ Furthermore, there are no cases when courts have explicitly identified any case as a SLAPP that would result in early rejection, making systematic data generation difficult.⁴¹ On the positive side, the Kosovo Judicial Council has flagged SLAPPs as a priority for civil cases within its 2026–2028 Strategic Plan for Access to Justice.⁴²

On awareness and capacity building, activities were primarily driven by civil society and international partners. FOL Movement, a local NGO that is also a member of the Coalition against SLAPPs in Europe, has published a Manual on SLAPPs for justice professionals,⁴³ and another one for civil society and media,⁴⁴ and initiated the creation of the National Group against SLAPPs,⁴⁵ as an informal cooperation mechanism among civil society, media, justice systems, and international partners. Kosovo Law Institute, a local NGO that works with the justice system in Kosovo, dedicated one of its media debate shows to SLAPPs.⁴⁶ The Council of Europe and Kosovo Justice Academy piloted dedicated training on SLAPPs for judges and prosecutors in 2024⁴⁷ and 2025,⁴⁸ and co-organized a specific conference on how judiciary can protect media freedom through pushing back against SLAPPs.⁴⁹ According to civil society, while judges and other justice professionals have regularly participated in such awareness raising and capacity-building events, there was no active participation from other relevant government institutions.⁵⁰ Similarly, there were no initiatives from public institutions to support any civil society anti-SLAPP campaigns,⁵¹ rather civil society points to cases when political actors’ from the ruling political party used or threatened with SLAPP-type lawsuits as an ongoing concern.⁵²

Despite substantive activity from civil society and international organizations, the lack of strong institutional engagement during the reporting period meant that it did not generate early results in practice.

Commitment 3.3: Mechanisms for citizens’ complaints on public services

• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Unclear	• Completion: No Evidence Available • Early results: No Notable Results
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Commitment 3.3 sought to establish mechanisms for citizens to submit complaints and feedback on the services of public institutions. Planned milestones focused on launching digital tools, such as a smartphone application, to allow citizens to communicate feedback directly to relevant institutions, accompanied by promotional campaigns, and capacity building for institutional staff to operate the tool effectively.

There is no information that any digital tool was started, or whether any promotional

campaign or capacity-building activity was organized.

Given the lack of information on implementation, no early results were observed.

Commitment 4.1: Fully open public procurement system

- | | |
|--|--|
| <ul style="list-style-type: none"> • Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest | <ul style="list-style-type: none"> • Completion: Limited • Early results: No Notable Results |
|--|--|

Commitment 4.1 aimed to open up data across the full procurement cycle, covering pre-tender, tender, and post-tender stages, in a machine-readable format, in line with open contracting principles. Planned milestones included reviewing existing deficiencies in public procurement through workshops and/or working groups, passing a new Law on Public Procurement and mechanisms to monitor its implementation, and developing new rules, tools, and guidelines to support an open e-procurement system capable of publishing machine-readable procurement information.

Progress has been limited. The first part consisting of legislative reform has seen no progress, despite ongoing work by the Ministry of Finance in drafting a new Law on Public Procurement. Initially, a working group established in 2022 failed to move ahead with a new law,⁵³ and the same happened with a new draft that was shared directly by the Ministry of Finance in December 2024. Civil society representatives describe the process as non-transparent and poorly documented, with civil society inputs reportedly not reflected, no public consultation held, and the draft law ultimately not proceeding to government for approval.⁵⁴

With no legal reform in place, there was limited progress also in the open e-procurement platform. The current legal framework has been drafted for a physical procurement system, and the existing e-Procurement platform faces serious difficulties due to the outdated legal framework. The existing e-Procurement platform does not provide a “machine-readable” approach in practice, with key documents (tender documentation, complaints decisions, contracts, and prices) still largely published as PDFs, often scanned and of poor quality, limiting usability and re-use.⁵⁵ On a positive note, a significant milestone was achieved with the e-procurement system’s interconnection to the Kosovo Financial Management and Information System, which is now technically interoperable (SIMFK),⁵⁶ as well as with the complaints process platform, preventing procurement initiation without allocated funds, enabling better payment traceability and pausing procurement processes while the complaints process is ongoing, thus improving the integrity of public funds management and transparency of public expenditures.⁵⁷ At the same time, civil society expresses serious system reliability and security concerns that were manifested most recently during a reported system outage in 2025 with inadequate backup safeguards.⁵⁸

Despite being identified as a “promising” commitment in the IRM Action Plan Review, with no policy reform in place and system improvements limited to interoperability of e-Procurement with several other systems, there are no notable results.

Commitment 4.2: Transparent recruitment of high-level officials

• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest	• Completion: Substantial • Early results: No Notable
This commitment is assessed in Section II above.	
Commitment 4.3: Increasing transparency, accountability, and financial control of political parties registered in the Republic of Kosovo	
• Verifiable: Yes • Does it have an open government lens? Yes • Potential for results: Modest	• Completion: Limited • Early results: No Notable Results
Commitment 4.3 sought to increase the transparency, accountability, and financial oversight of political parties registered in Kosovo. Planned milestones included reviewing and completing amendments to the legal basis governing political party financing to reinforce transparency and enforcement, digitizing reporting on party revenues and expenditures through the creation and operation of an online platform for political party finances, supporting advocacy and cooperation with civil society and media to encourage reporting of potential misuse, and monitoring political party financial spending during the 2025 election cycle at both central and local levels. There was no progress on legal reform during 2024–2025, with no new amendments or any relevant process for amending the Law on Financing of Political Parties or the Law on General Elections. The 2023 Law on General Elections, implemented for the first time in February 2025 elections, produced some procedural improvements, such as creating the Office for Registration, Certification and Financial Control (ORCFC) within the Central Election Commission (CEC), yet it did not include any substantial change in the rules of financing political parties and election campaigns.⁵⁹ Following first-time implementation of this law in the Parliamentary Elections of 9 February 2025, the ORCFC developed several internal recommendations for legal amendments including allowing for a separate campaign bank account for political parties, requiring political candidates to report campaign income and expenditure, and adjusting contribution limits.⁶⁰ There is no online platform for reporting political party finances. The CEC received a software platform as a donation in late 2024 but did not launch it as it was not fully functional and lacked an online publication component.⁶¹ In the meantime, disclosures remain largely PDF-based, and CEC publishes various reports on its central website, including quarterly reports of parliamentary political parties,⁶² annual financial reports of registered political parties,⁶³ and election campaign financial reports.⁶⁴ Despite noting openness to cooperation with civil society and access to data from CEC,⁶⁵ CSOs leading election monitoring networks find no dedicated institutional program or funding to support CSO or media monitoring, which remains mainly supported by international donors.⁶⁶ The EU echoes similar concerns around the absence of interim financial reporting and the lack of regulation of third-party financing.⁶⁷	

Monitoring of three cycles of elections held in 2025 (two parliamentary elections and one local election with two rounds) by CEC was focused on campaign activities and did not include specifically the financial spending of political parties, which are covered only through own reporting by political parties.⁶⁸ In contrast, civil society continued to monitor financial spending during elections, with monitoring evidence from 2025 pointing to growing and more complex campaign spending especially online, with significant spending linked to individual candidates and some third-party advertising, highlighting persistent challenges in timely reporting, real-time transparency, and control of third-party and digital campaigning finance.⁶⁹

Despite being identified as a “promising” commitment in the IRM Action Plan Review, the lack of progress in both legal reform and online platform development meant that it did not generate early results in practice.

¹ Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments’ short titles may have been edited for brevity. For the complete text of commitments, please see Kosovo’s action plan: <https://www.opengovpartnership.org/documents/kosovo-action-plan-2023-2025-december/>
3. For more information on the assessment of the commitments’ design, see Kosovo’s Action Plan Review: <https://www.opengovpartnership.org/documents/kosovo-action-plan-review-2023-2025/>

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