

**Report on the Detailed Impact Assessment of the e-
Government Development Strategy in the Republic of
Serbia 2015–2018**

I SUMMARY

By adopting the e-Government Development Strategy for the first time, back in 2015, the Serbian Government systematically established public policies in the field of the development of electronic Government, as an important dimension of public administration development in the Republic of Serbia. At the time, Serbia was far behind the European Union countries in e-Government development. The very act of adopting the Strategy was of great importance for the development of e-Government, as it suggested a commitment to dealing with the issue. In view of the fact that the validity period of the Strategy expired in the last quarter of 2018, it was necessary to conduct an *ex-post* impact assessment of the Strategy, i.e. the measures planned in the Strategy and the accompanying action plans, and the public policy documents for planning the development of e-Government in Serbia for the forthcoming period.

Bearing in mind that the **Strategy** and its Action Plans were adopted at a time when there were no prescribed standards for writing public policy documents or planning documents¹, it is not surprising that those documents have methodological shortcomings which have made it difficult to monitor and evaluate their implementation. Also, the **Strategy** objectives deviated from the SMART standards on the formulation of objectives, and as such have made the evaluation of the Strategy even more difficult. If the true impact of the Strategy was to be assessed, it was important to redefine, in accordance with the Law on the Planning System of the Republic of Serbia, the Strategy's overall and specific objectives as well as their performance indicators. The overall and the specific objectives were redefined against the measures and the activities contained in the Strategy and its action plans, and their performance indicators were then defined against the redefined overall and specific objectives.

As regards the Strategy Action Plans, only the **Action Plan 2015–2016** was adopted. The **Action Plan 2017–2018**, having been implemented but never adopted, is the subject of this Impact Assessment Report. Assessing the impact of these action plans was made complicated by the fact that their measures and activities were not methodologically clearly delineated. It is important to note that the assessment, conducted in accordance with the performance indicators as defined in the action plans, showed poorer results than the actual measures and activities planned and implemented had on the development of e-Government in Serbia. For instance, although the **Action Plan 2015–2016** had been largely implemented (80% of measures were fully or partially implemented, according to the available data), its true impact on the development of e-Government was difficult to assess without first redefining the performance indicators at the level of measures. On the other hand, **Action Plan 2017–2018**

¹ The National Assembly adopted the Law on the Planning System of the Republic of Serbia (*The Official Gazette of the Republic of Serbia*, No. 30/18) in April 2018, and the Government adopted the Regulation prescribing methodological rules for the drafting of public policy documents in February 2019, which completed the legal framework on public policy planning in Serbia in early 2019. Because these regulations did not exist when the Strategy was being prepared, an *ex-ante* impact analysis of public policies was not mandatory. The purpose of adopting the two regulations was to establish a regulatory framework on public policy planning in Serbia, which would enable a consistent, coordinated, realistic and responsible planning, contrary to the state of planning at the time. There were over 100 strategies which, as a general rule, were not mutually harmonised, and often impossible to implement because the financial and administrative resources and constraints had not been taken into consideration during planning.

was more detailed and more suitable for an efficient implementation and subsequent monitoring of such implementation. However, the assessment of the impact and the performance of the implemented measures was made difficult by the absence of a clear hierarchy and a clear link between the objectives established in the Strategy and the groups of measures, individual measures and activities established in that Action Plan. Thus, a review of the Action Plan 2017–2018 results, based on 15 (out of 23) performance indicators at the level of a group of measures for which data were available at the time of the assessment, showed that the target value was reached in one case only. In terms of the level of the implementation of the activities, only 35.7% of activities were fully implemented, 15.7% were partially implemented, 44.3% were not implemented at all, and 3 were abandoned.

In comparison, the assessment conducted on the basis of indicators set for the redefined objectives of the Strategy, showed far better results, i.e. the impact of the implementation of the Strategy and its Action Plans, particularly Action Plan 2017–2018, was far greater. Thus, applying the internationally accepted indicators to assess the state of e-Government development in Serbia, it would appear that Serbia has made the following progress:

- In terms of the **E-Participation Index**, which assesses the use of e-Services through which the public administration provides information to Serbian citizens, Serbia jumped from 81st place to 48th place in 2018;
- In terms of the **Online Service Index**, which measures the scope and the quality of e-Services, Serbia went from 0.3937 to 0.7361 index points between 2014 and 2018, when e-Services were being fastly developed;
- In terms of the **Global Open Data Index**, which measures the availability of different data sets of the public administration, Serbia improved its ranking from 48th in 2014 to 41st place in 2017.

This progress suggests that Serbia, during the Strategy validity period, improved its e-Government considerably. However, the impact of the specific measures of the Strategy on that progress remained debatable, because of the methodological inconsistency in the formulation those measures and their corresponding activities as well as the inadequate definitions of the performance indicators of those measures and activities.

On the other hand, the wide consultation process conducted during the implementation of the Action Plan 2017–2018 undoubtedly improved the quality of that document. This is visible in the comprehensiveness and the complementarity of planned activities, and the clear prioritisation of the specific groups of activities, with key impact on the development of e-Government. This mostly refers to the groups of activities oriented towards the development of institutional and regulatory framework, as a precondition for the further development of e-Government.

Furthermore, the inclusion of line ministries in the development of the Action Plan 2017–2018 since the beginning, contributed to the accuracy of the formulations of specific activities and their principal or lead implementers. This in turn had a positive impact on how implementable the Action Plan would be and, consequently, the overall results of the Strategy on the development of e-Government in Serbia.

The thorough analysis of the consistency between the Strategy and its Action Plans with the subsequently prescribed methodological rules, as presented in this Report, should not be

regarded as a criticism of those documents because of the fact they could not be drafted in accordance with the said rules which were not in force at the time of their adoption. The purpose of that analysis was to draw conclusions and give recommendations with respect to defining the planning elements of the future e-Government policy document.

As regards the institutional framework within which the Strategy and the Action Plans were prepared and implemented, it is important to note that, during 2017, the Directorate for e-Government grew into the Office for Information Technology and e-Government. This had a positive impact on the implementation of the Strategy, because the institution had strengthened its position and expanded its competences, primarily in the domain of operativity. Nevertheless, if it is argued and accepted that further development of e-Government and the efficient implementation of public policy measures oriented towards the establishment of institutional and human resource capacities for the development of e-Government warrant the Office gaining an undisputable status of an independent legal entity, then defining the legal form of the Office in a statute would be desirable. Comparing the Strategy to the methodological rules subsequently prescribed in the Law on the Planning System and the Regulation on the Methodology of Public Policy Management, Policy and Regulatory Impact Assessment, and Contents of Individual Public Policy Documents has led to the conclusion that the e-Government Development Programme 2020–2022 should:

- contain a more detailed description of the current state e-Government, including information about the results of the *ex-post* assessment of the Strategy;
- define one overall objective and three specific objectives and establish a clear link between them, with an explanation of deviations in the number of specific objectives, if necessary, instead of 4 overall objectives and 6 specific objectives which are currently in the Strategy;
- establish a direct link between the established objectives and performance indicators, and define such indicators at the level of outcome instead of impact;
- define the objectives in line with the view already taken by the e-Government Development Programme Working Group and the e-Government Coordination Council, i.e. define the specific objectives as follows: *Development of e-Government infrastructure and ensuring interoperability; Improvement of the legal certainty of the use of e-Government; Increase e-Government accessibility to citizens and businesses by improving customer services; Open Data in e-Government;*
- [only] contain measures which have been defined to include the mandatory additional elements, or implementation indicators, baseline values, target values and sources of verification of results, and given clear titles from which the desired results could be derived easily;
- [only] contain measure performance indicators which have been defined as results, and as such be in the sole service of the corresponding measures.

Further recommendation is to:

- conduct, a wide consultation process involving representatives of the relevant or interested groups, using adequate consultation techniques (surveys, focus groups, round tables and panel discussions, semi-structured interviews, written comments), for the purpose of drafting the Programme;

- draft the Action Plan to the Programme in accordance with Article 58 of the Regulation, using the tables developed by the Public Policy Secretariat, for the purpose of entering public policy documents into the Unified Information System referred to in Article 47 of the Law on the Planning System.

The Impact Assessment has also helped identify measures and activities planned in the Strategy and the Action Plans which had not been implemented or had not been fully implemented, but should be incorporated into the E-Government Development Programme 2020–2022 because of how important they are for the development of e-Government. They are the following measures/activities:

- Building the second Data Centre in the Republic of Serbia;
- Establishing electronic office operations;
- Regular training in electronic services for civil servants and citizens;
- Ensuring a coordinated use of IT resources by assigning a single body to work on creating, maintaining and managing the state cloud, as well as provide continuous training for employees;
- Improving the legal framework on e-Commerce in public administration bodies;
- Establishing and popularising a unified way of identifying e-Government users, which will replace the identification/signature of the party in most procedures;
- Abolishing the obligation of the parties to provide a proof of payment;
- Enabling electronic archiving and long-term storage of business records (a group of measures);
- Opening data generated in the course of public administration operations (a group of measures);
- Establishing a special body for the coordination of e-Government at the level of local self-governments;
- Establishing and publishing a national register of trusted service providers – the Trusted List (certification bodies, time stamp issuers, CRL and OCSP providers...);
- Completing the legal framework on e-Government within the purview of the Ministry of Finance;
- “e-Literacy for a Million Citizens” for using e-Services on the e-Government Portal – training in the national e-Government Portal for citizens;
- Establishing a central electronic system for collection of data from citizens on the quality of e-Government services provided;
- Raising awareness about the importance of open data and encouraging the use of open data.

Although the implementation of the above measures and activities is mostly in a late stage, they should be incorporated into the Programme with a view to planning the final or additional activities or their modification, if continuity in planning and focusing on the priorities of the e-Government development is to be maintained.

In terms of the extent of *ex-ante* analysis which needs to be conducted during the preparation of the Programme, it has been determined that a detailed *ex-ante* impact analysis should only be conducted for measures which may have significant impact, i.e. those exhaustively listed in Article 8, paragraph 4 of the Regulation. A detailed analysis need not be conducted for

measures which are implemented at the level of the Government or the National Assembly, i.e. measures which are implemented as prescribed by the law or stipulated in an international treaty.

II INTRODUCTION

This Report on the Detailed Impact Assessment of the e-Government Development Strategy (hereinafter: the Report) covers the *ex-ante* analysis of the e-Government Development Strategy in the Republic of Serbia 2015–2018 (hereinafter: the Strategy) and its two action plans: Action Plan 2015–2016 and Action Plan 2017–2018 (hereinafter collectively referred to as Action Plans). The latter – although implemented, but never adopted – has served as the basis for this Report. The Detailed Impact Assessment (hereinafter: the Impact Assessment) was conducted under the EuropeAid/I37928/I/1/I/SER/RS project “Support to Public Administration Reform under the PAR Sector Reform Contract” (hereinafter: the Project).

The purpose of the Impact Assessment was to show the level of implementation of public policies established in the Strategy, as well as to assess the methodological soundness of the planning elements and any potential deviations from the rules prescribed by the newly adopted Law on the Planning System of the Republic of Serbia (*The Official Gazette of the Republic of Serbia*, No. 30, 20 April 2018) (hereinafter: the LPS) and the Regulation on the Methodology of Public Policy Management, Policy and Regulatory Impact Assessment, and Contents of Individual Public Policy Documents (*The Official Gazette of the Republic of Serbia*, No. 8 of 8 February 2019) (hereinafter: the Regulation).

The Impact Assessment of the Strategy and Action Plans – as presented in this Report – primarily concerned the impact of e-Government measures which have been implemented on the basis of these documents. To that end, a desk analysis was performed on the basis of available reports and other types of analyses, and institutions which had participated in the creation and the implementation of these public policy documents were consulted. Required data were also obtained through consultations and workshops organised by the Coordination Council for e-Government, and a questionnaire which was completed by 17 public authorities. The questionnaire had been created jointly by the Project, NALED and the Office for Information Technology and e-Government (hereinafter: the ITE Office). For the purpose of obtaining detailed data on the characteristics of e-Government, interviews were conducted under the Project. As regards the impact assessment of the Strategy at the level of objectives, due to the methodological inconsistency of the Strategy, those objectives were redefined for the purpose of evaluation and evaluated on the basis of new, internationally recognised indicators.

The Impact Assessment is of particular importance for the preparation of the new public policy document on the planning of public policies on e-Government for the next period, titled: E-Government Development Programme 2020–2022 (hereinafter: the Programme), which is to ensure continuity and consistency of e-Government planning. These two planning qualities have been defined as principles under Article 3 of the LSP, and guaranteed elsewhere in the LPS and the Regulation. Together, they make the Impact Assessment and this Report the basis for the *ex-ante* analysis of the Programme.

The first part of this Report identifies methodological errors in the planning of the Strategy. These are mostly errors in defining objectives and corresponding measures, as well as errors in defining performance indicators on the basis of which the impact evaluation of the Strategy is planned. The purpose of highlighting the errors is to provide recommendations for preventing such errors from

occurring in the next planning cycle. The second, main part of this Report explains the extent to which the Strategy objectives have been achieved and the measures as planned in the Strategy Action Plans implemented, so as to enable the continuity of planning, i.e. to plan the Programme measures in accordance with the achieved results of the Strategy. The final part of the Report lists recommendations on how to prepare the Programme, based on the key findings and the results of the Impact Assessment.

III KEY FINDINGS OF THE ANALYSIS AND RESULTS OF THE EVALUATION

1. METHODOLOGICAL CONFORMANCE OF THE STRATEGY WITH THE LEGAL FRAMEWORK – A GENERAL OVERVIEW

The preliminary analysis of the Strategy and its Action Plans is based on an assessment of the extent to which those public policy documents have been aligned with the subsequently adopted LPS and Regulation – key legislation on public policy planning in Serbia–, and contain the mandatory contents of planning documents, such as strategies and action plans². This analysis should demonstrate the extent to which non-compliance with the subsequently established planning standards has affected the quality of the Strategy and its Action Plans, including their implementation. The analysis serves to improve the process of planning future public policies on e-Government, especially the Programme.

Table 1 Overview of the alignment of the Strategy contents with the mandatory contents prescribed by the LPS

Strategy contents according to the LPS	Is it contained in the Strategy?
1. Vision - desired state	Yes, in Part 3.1. Vision of public administration from the perspective of e-Government
2. Overview and analysis of the current situation	Yes, in Part 4. Analysis of the current situation
2.1. Assessment of the level of achievement of objectives on the basis of performance indicators	Partially contained in Part 4.1. Assessment in the field of eGovernment
3. Overall objectives	Yes, in Part 5. Strategy objectives
3.1. Specific objectives	Yes, in Part 5. Strategy objectives
4. Measures for the achievement of objectives	No
4.1. Causal links between overall and specific objectives	No
4.2. Assessment of the measures' impact on natural and legal persons and the budget	No
5. Key performance indicators at the level of overall objectives	Grouped as overall and specific objectives in Part 5.1 Success indicators
5.1. Key performance indicators at the level of specific objectives	Grouped as overall and specific objectives in Part 5.1 Success indicators
5.2. Key performance indicators at the level of measures	No
6. Institutional framework and plan for the implementation, performance evaluation and reporting on implemented objectives and measures	No
6.1. Institutions responsible for monitoring the implementation of the Strategy	No
Contents of the Action Plan according to the LPS	Is it contained in the Action Plan 2015–2016?
1. Overall objectives from the Strategy	No
1.1. Specific objectives from the Strategy	Yes
2. Measures for the achievement of overall and specific objectives	No. Most activities are listed as measures which are not specified or explained through activities
2.1. Activities for the achievement of overall and specific objectives	Yes

² Mandatory elements of the Strategy are prescribed in Article 13 of the LPS, whereas mandatory elements of action plans are prescribed in Article 17 of the LPS.

3. Institutions responsible for carrying out measures	No
3.1. Institutions responsible for carrying out activities	Yes
4. Deadline for completion of envisaged measures	No
4.1. Deadline for completion of envisaged activities	Yes
5. Funds required for the implementation of measures	No
5.1. Sources of funding for the implementation of measures	Yes
6. Key performance indicators at the level of measures	No
6.1. Key performance indicators at the level of activities	Yes
7. Regulations to be adopted or amended for public policy measures to be implemented	No

The preliminary analysis identifies the mandatory elements contained in the Strategy, without evaluating the extent to which such elements have been correctly developed. Thus, the quality of individual planning elements, such as objectives and performance indicators, will be analysed as per the bellow breakdown.

1.1. The vision of the Strategy is aligned with the LPS

The Strategy clearly defines its own vision. Part 3.1 *Vision of public administration from the perspective of e-Government* lists the desired changes to public administration operations through the improvement of the e-Government. With the LPS and the Regulation only prescribing that the vision ought to identify the desired state to be achieved through the accomplishment of the overall and the specific objectives but remaining silent on how the vision is to be defined, the conclusion is that the vision was formulated correctly.

1.2. Overview and analysis of the current state of e-Government, as presented in the Strategy

An analysis of the current state is presented in Section 4 of the Strategy. That section begins with a summary of the e-Government reform steps taken in the period preceding the adoption of the Strategy. The section then presents the state of individual subfields which are important for e-Government, including three assessments: a) assessment of the implementation of the previous e-Government strategy, b) assessment of the suitability of the regulatory framework for the development of e-Government, c) assessment of the level of achievement of objectives on the basis of performance indicators. The last one is only partially presented in Part 4.1. *Assessment in the field of e-Government*, i.e. it merely describes qualitatively the state of the relevant subfields, but does not present any qualitative indicators against which the state of e-Government at the time of the adoption of the Strategy could be assessed.

The Regulation defines in greater detail the form and the contents of the Strategy. Article 55, paragraph 1, point 3) prescribes that a description of the current state of a specific field of planning and implementation of public policies should reference an *ex-post* assessment of previous public policies in that field which is to be look at the results of the objectives of such policies *vis-à-vis* the indicators defined in documents which established those policies. However, the Strategy does not contain an overview of the implementation of previous public policy documents in the field of e-Government nor does it contain sufficient data on the state of e-Government at the time the Strategy was being adopted. Therefore, the current state of e-Government could only be partially presented, and the Strategy, to a degree, is not aligned with the subsequently adopted LPS and Regulation.

1.3. Overall and specific objectives of the Strategy

The overall and the specific objectives of the Strategy are defined in Section 5 – *Objectives of the Strategy*. Four overall and 6 specific objectives in total were defined, but their correlation was not explained. However, Article 13, paragraph 2 of the LPS prescribes that the Strategy, as a rule, has one overall objective and up to 5 specific objectives. Furthermore, no reasoning for defining so many overall objectives had been provided. Therefore, it could be argued that the Strategy deviates from the methodological rules on defining objectives. Other arguments and conclusions of the analysis of the Strategy objectives are presented in Part *b) Compliance of overall objectives of the Strategy with the legal framework* below.

1.4. Measures planned in the Strategy

Measures planned for the purpose of achieving specific and overall objectives in the Strategy are not listed in an organised manner. In the text of the Strategy itself, public policy measures are not clearly defined, and even when they are identified, they do not refer to any specific objective. Consequently, their importance for the attainment of any specific objective cannot be assessed.

Article 55, paragraph 1, point 6) of the Regulation prescribes that the Strategy should contain accurately defined measures for the achievement of specific objectives, which primarily includes an identification of the institution competent for its implementation, as well as defining result indicators at the level of measures, and a brief summary of projects implementing the measures. In Section 5 *Objectives of the Strategy*, projects and measures for the achievement of specific objectives are only briefly described. Additionally, the measures are not even defined in a structured manner. The conclusion would then be that the Strategy measures are not planned in a manner which would enable their evaluation and the establishment of a system of accountability for their implementation.

Analysis of the impact of measures on natural and legal persons and the budget is not presented in the Strategy, and thus the expected overall impact of the Strategy cannot be clearly assessed. Performance indicators, on the basis of which the implementation of individual public policy measures would be monitored, were also not listed.

Analysis of the impact of public policy measures is an integral part of the overall public policy impact analysis, as prescribed by the LPS and methodologically governed by the Regulation³. In view of the time gap between the adoption of the Strategy and the establishment of the above standards, it was to be expected that an impact analysis of the measures defined in the Strategy would not be explained in the Strategy. Therefore, the recommendation is that this analysis be presented in the future public policy document, i.e. the Programme, in accordance with Articles 24–30 of the Regulation.

1.5. Performance indicators defined in the Strategy

Performance indicators are defined at the level of the entire Strategy. The three indicators are meant to confirm the achievement of the prescribed objectives by 2018. The indicators did not refer to individual overall or specific objectives, but are presented as a group, for all objectives. Thus, it is not possible to determine which indicator is used for which individual objective.

In addition, result indicators were not defined at the level of public policy measures, which makes it impossible to evaluate the impact of concrete measures and reduces the Strategy to a mere list of implemented activities, and at best, established functionalities within the ITE Office. Such an

³ Article 55, paragraph 1, point 7.

evaluation does not provide a full picture of the impact of implemented activities and established functionalities, and consequently, a full picture of the achieved Strategy objectives. For example, conducting training per se is not the purpose. Rather, the purpose is to increase the number of employees in the public administration who have the knowledge required for the implementation of electronic procedures. Also, linking concrete electronic registers and records to the Service Main is not the purpose of the establishment of this important functionality within the ITE Office. Its purpose is that the largest possible number of users starts using that functionality and that the obligation to submit extracts from such registers and records is abolished.

Finally, the LPS prescribes that indicators at the level of overall objectives are defined as effect indicators, and as outcome indicators at the level of specific objectives. Thus, the Strategy is inconsistent in terms of terminology.

1.6. Institutional framework and plan for the implementation, performance evaluation and reporting on implemented objectives and measures

Institutional framework and plan for the implementation, performance evaluation and reporting on implemented objectives and measures, are not specified in the Strategy.

Firstly, it is not explicitly stated which institution is competent for reporting on the Strategy implementation to the Government. Looking at the different ministries' competences in the field of e-Government, it is evident that the Ministry of Public Administration and Local Self-Government is the responsible entity. Thus, this shortcoming is one of formality, and is not an issue.

The real issue, however, is that the Strategy – being an inter-sectoral strategy – does not state which institutions are responsible for the implementation of concrete measures and, thus, for the oversight of the implementation of activities within such measures. Despite the fact that this only became a mandatory element of the Strategy once the LPS and the Regulation came into force, it should have been clear at the time of the adoption of the Strategy that it was necessary to determine which institution was to implement which measure or oversee its implementation. Essentially, the Strategy did not identify mechanisms for the implementation of public policy measures in a manner prescribed in the Regulation⁴. Such mechanisms would have, otherwise, entailed: a list of institutions competent for the implementation of specific measures, deadlines for the implementation of measures, cost and resource estimates as well as sources of funding. With the level of measures being an essential planning element for the monitoring of the implementation of strategies, its absence in this Strategy is considered a significant shortcoming.

1.7. Information about conducted consultations

The obligation to conduct consultations during the preparation of public policy documents is prescribed in Article 34, paragraphs 1–3 of the LPS, and the obligation to report on them in Article 34, paragraph 4 of the LPS. Article 55, paragraph 1, point 11) of the Regulation prescribes that information about conducted consultations is a mandatory element of the Strategy, i.e. the method used to conduct the consultations, the interest groups consulted and the outcome of the consultations (e.g. what was (not) accepted and included in the text of the Strategy, and why). Such information contributes to the transparency of the process of public policy making, and in the case of the Strategy, it would point to the reasons for the implementation of concrete public policy measures, which would

⁴ Article 55, paragraph 1, point 8).

later be implemented through the Action Plans. Such information becomes important when multiple options for the achievement of the same objective are being considered – for which prior input from the relevant stakeholders is crucial.

1.8. Methodological conformance of the Action Plan 2015–2016 with the LPS and the Regulation

Action Plan 2015–2016, which is an integral part of the Strategy, has also been analysed in terms of conformance to the standards of mandatory content, in accordance with the LPS. The analysis has shown that the basic structure of the Action Plan is such that activities, corresponding to specific objectives, are made up of their own planning elements. The elements are as follows:

- Number of activity;
- Description of activity;
- Deadline for implementation (quarterly);
- Indicators, with baseline and target value;
- Funds, divided into three different sources: 1. Budget of the Directorate for e-Government; 2. Budget of the Republic of Serbia; 3. Donations;
- Principal or lead implementer;
- Partners.

The same as in the Strategy, the Action Plan does not differentiate between overall and specific objectives nor does it list measures to which the planned activities refer. Most of the activities are actually defined at the level of measures (they are called activities even though they are measures), so it may be concluded that the Action Plan largely meets the standards which were later prescribed by the LPS. In addition, the Action Plan provides little insight into the concrete activities for the achievement of objectives. The monitoring of the effect of most measures may be accurately established only through the lead implementers' self-assessments.

With respect to the mandatory contents as prescribed in Article 58 of the Regulation, the Action Plan lacks the method of verification of result indicators, i.e. the source of information on the basis of which verification is performed. Consequently, an independent evaluation of results of the measures, and, ultimately, the outcomes and effects of the objectives of the Strategy, is possible.

1.9. Methodological conformance of the Action Plan 2017–2018 with the LPS and the Regulation

Action Plan 2017–2018 is more detailed and more suitable for an efficient implementation and subsequent monitoring of such implementation. The accuracy and consistency of this Action Plan has enabled a wide implementation of the consultation process.

Nevertheless, the structure of this Action Plan deviated from the structure of the earlier Action Plan, and is characterised by an absence of a clear hierarchy or a link between the objectives established in the Strategy, groups of measures, individual measures and activities, which has made it difficult to assess the effects of the implemented measures, and thus the impact of the Strategy. A probable reason for that is the methodological inconsistency of the Strategy as well as the need for additional operationalisation, i.e. planning of additional measures and activities. Performance indicators (23 in total) are well defined, but only at the level of groups of measures, and not at the level of individual measures and key activities.

The conclusion then is that, due to its structure, the true impact of Action Plan 2017–2018 implementation may not be assessed without analysing additional performance indicators.

2. EX-ANTE IMPACT ANALYSIS OF PUBLIC POLICIES AS PER THE LPS

2.1. Was there a need for an *ex-ante* impact analysis of the Strategy?

Article 31 of the LPS prescribes an obligation to conduct an *ex-ante* analysis of the effects of public policy documents as they are being prepared, i.e. to assess the likely effects of the planned policy measures. Article 40 of the LPS prescribes an obligation to conduct an *ex-post* impact assessment of public policy documents, i.e. to evaluate the actual post-implementation impact of the public policy measures and objectives.

Since the Strategy was adopted before the LPS was, the Report on the *ex-ante* impact analysis could not be included in the Strategy. Nevertheless, an *ex-ante* impact analysis of concrete measures and activities should be a logical step in the process of public policy preparation. In other words, the analysis should have been conducted even though it was not legally mandatory at the time. For that reason, this Report will present conclusions of the *ex-ante* impact analysis of the Strategy as if it had included the criteria which were subsequently prescribed in the Regulation. These conclusions should serve as a guideline for future e-Government public policy making.

Pursuant to the Article 7, paragraph 1 of the Regulation, the decision on the implementation of an *ex-ante* impact analysis of public policy documents should be adopted by the proposer on the basis of the results of the impact and priority levels test which is to be conducted in accordance with Appendix 3 of the Regulation.

The impact test entails that the proposer conducts an assessment of the impact level and priority level of a public policy which is being made, where the impact and priority are sorted on a scale from low to medium to high.

Table 2 Test of the impact level and priority level

Test of the public policy impact level		Test of the public policy priority level	
High impact	Very complex, politically sensitive, or with considerable financial expenses	High priority	Measures of the Government of a local self-government unit of high political priority, with significant political, fiscal or legal consequences.
Medium impact	Somewhat complex, politically sensitive, or with considerable financial expenses	Medium priority	Measures of the Government of a local self-government unit with lesser political, fiscal or legal consequences.
Low impact	Very clear; its implementation causes minimum expenses	Low priority	Measures of a ministry or another public administration body or local self-government unit, the failure to implement which will cause minimum harmful consequences.
Determining needs for conducting an Impact Analysis (IA)			
High priority		Medium priority	Low priority
High impact	IA needed	IA needed	IA needed

Medium impact	IA needed	IA needed	IA needed
Low impact	IA recommended	IA recommended	IA not needed

In view of the fact that the Strategy defines public policy measures of high political priority with significant political, fiscal or legal consequences⁵, the conclusion is that it was necessary to conduct an ***ex-ante* impact analysis when the Strategy was being prepared.**

2.2. What should be the scope of an *ex-ante* impact analysis of the Strategy?

Article 8 of the Regulation prescribes the scope of the *ex-ante* impact analysis which is to be conducted for a concrete measure. Depending on whether it is necessary to conduct a basic impact analysis or a detailed impact analysis, different impact analysis steps are implemented, i.e. an analysis of a narrower or wider scope should be implemented. Therefore, the Report on the analysis of expected impact of concrete measures will be less or more detailed.

Article 8 of the Regulation explains in detail when a detailed impact analysis would be necessary. The basic criterion is an assessment of public policy measures which would cause significant effects on natural persons, including vulnerable groups of the population, and/or legal persons, and/or the budget of the Republic of Serbia, and/or the environment and/or public authorities. Paragraph 4 of the Article elaborates on the cases in which effects may be considered significant. Naturally, a detailed analysis should only be conducted in case of those measures that produce such significant effects, whereas a basic impact analysis would suffice for other measures.

For the purposes of this Report, cases will be listed which support the view that a detailed *ex-ante* impact analysis is needed for concrete measures of the Strategy when they affect:

- over 200,000 citizens;
- the market conditions and the competition (e.g. introduction of barriers to the market entry and exit, competition constraints, creation of preconditions for a preferential treatment of certain commercial groups or groups of other legal persons, impact on productivity or innovations, pricing or production levels, impact on quality, level or availability of certain products and services);
- over 5% of entrepreneurs or legal persons of a certain category according to criteria established under the law regulating accounting, or over 20% of such persons conducting a certain activity, if such public policy measures dominantly affect business activity in that field;
- the implementation of public investments, particularly capital projects, in accordance with the regulations governing the content, method of preparation and assessment, as well as monitoring of implementation and reporting on the execution of capital projects.

Based on the conclusions thus far, the recommendation is that a) for future public policy documents in the field of e-Government, an *ex-ante* impact analysis be mandatory as per the LPS and the Regulation, and b) a detailed *ex-ante* impact analysis only be implemented with regard to measures that may have the above effects, where a limited analysis may be implemented with regard to measures which the Government has previously decided should be implemented, or measures which

⁵ This has been confirmed in the text of the current Strategy and verified in many media appearances of the senior officials of the Government, including the Prime Minister.

are to be implemented as prescribed by the law or stipulated in an international treaty, because the detailed impact analysis of such measures would have been conducted before the Government made its decision, i.e. the adoption of the law or the signing/ratification of the treaty.

3. ANALYSIS OF THE STRATEGY OBJECTIVES (CONFORMANCE WITH THE LEGAL FRAMEWORK, AND THE LEVEL OF IMPLEMENTATION/ACHIEVEMENT)

The analysis of the objectives of the Strategy was focused on a) determining the extent to which they matched the definitions of the overall and specific objectives as prescribed in Article 2, paragraph 1, points 11)–12) of the LPS, and b) assessing whether they had also been set in a methodologically correct way, i.e. whether they conformed with the Regulation.

3.1. Overall and specific objectives – analysis of the legal framework

The LPS defines overall and specific objectives as follows:

- **Overall public policy objective** is a long-term objective which defines the desired state of the subject public area at the level of the society – Article 2, paragraph 1, point 11);
- **Specific public policy objective** is an objective defined with regard to certain entities and/or relations in the subject policy area, the implementation of which creates preconditions for the achievement of the overall objective – Article 2, paragraph 1, point 12).

Pursuant to Article 15 of the Regulation, an overall objective is a projection of the desired state at the level of the society in a certain field of planning and implementation of public policies. Specific objectives are also projections of the desired state, but ones which contribute to the achievement of the overall objective, and they are to be attained through the implementation of measures/groups of measures contained in the public policy document or relating to a specific objective. Moreover, overall and specific objectives need to be specific, measurable, attainable, realistic and timely, or **SMART**.⁶

The **SMART** approach to defining objectives explained:

- Specific – the objective is defined in a specific manner, i.e. it must make it clear what outcome is striven toward, and that it is specific to a public policy area;
- Measurable – the objective is defined in such a manner that it is measurable, i.e. expressed in a unit of measurement for which it may be unambiguously established to what extent the objective has been achieved. The objective may also contain the qualitative measure determinants (higher, lower, decrease, increase);
- Attainable – the objective is defined in such a manner that it will achieve the desired state, which is actually achievable and attainable, both politically and for all stakeholders;
- Realistic – the objective is defined in such a manner to be relevant to the overall strategy, i.e. specifically connected to the field of the public policy document. The objective is realistic in the sense that it describes a desired state with realistic projections.
- Timely – the specific time when the achievement of the objective is expected has been established.

3.2. Overall and specific objectives as defined in the Strategy

Overall objectives of the Strategy are defined as follows:

- 1) Increasing the level of user satisfaction with public policies;

⁶ European Commission (SEC 2009) 92, Impact Assessment Guidelines, page 28.

- 2) Reduction of the administrative burden for commercial entities and citizens;
- 3) Improvement of the efficiency of public administration through the use of information-communication technologies; and
- 4) National and cross-border interoperability (particularly with the EU countries).

Overall objectives of the Strategy are defined as follows:

- 1) Establishing an institutional framework and completion of the legal framework for ensuring a coordinated management of the e-Government development;
- 2) Establishing interoperability between information systems of public administration bodies, bodies of the autonomous province and local self-government units;
- 3) Establishing essential electronic registers linked to other information systems of state administration bodies, bodies of the autonomous province and local self-government units;
- 4) Enabling new e-Services through the national e-Government Portal and other portals;
- 5) Training civil servants to use ICT; and
- 6) Establishing an open government.

3.3. Conformance of the Strategy overall objectives with the legal framework

Only one overall objective is defined in accordance with the LPS, i.e. it represents the desired state of the e-Government development at the level of the society. That is the overall objective 3: *Improvement of the efficiency of public administration through the use of information-communication technologies*.

For overall objectives to be aligned with the LPS, they need to be redefined as follows:

- Increasing the level of user satisfaction with the development and provision of public policies;
- Reduction of the administrative burden for commercial entities and citizens through an improvement of the electronic provision of public services;
- Development of national and cross-border interoperability (particularly with the EU countries).

Table 3 Assessment of the conformance of the Strategy objectives with the LPS and the SMART approach to defining objectives

Overall Objectives		S	M	A	R	T	Conformance with the LPS
1.	Increasing the level of user satisfaction with public policies	X	X	√	√	X	No
2.	Reduction of the administrative burden for commercial entities and citizens	X	X	√	√	X	No
3.	Improvement of the efficiency of public administration through the use of information-communication technologies	√	X	√	√	X	Yes
4.	National and cross-border interoperability (particularly with the EU countries)	X	X	√	√	X	No

Since the LPS prescribes that the Strategy, as a general rule, is to have one overall objective, it would be necessary to choose, from the above objectives, the one which has the most characteristics of an overall objective, and redefine it so that it includes the rest of the objectives. This would probably be the overall objective 3, expanded by merging with the overall objective 1, which would define the projection of the desired state in such a manner that the objective is to improve the efficiency of the public administration through the use of IT, at the satisfaction of e-Government users. In other words, the overall objective of the Strategy may be defined as follows: **Development of an efficient and user-centric administration through the use of information-communication technologies**. This is, indeed, an objective that will always be taken into consideration when creating public policies in the field of e-Government, regardless of its level of development, because the system could always become more efficient and user-centric.

3.4. Conformance of the Strategy specific objectives with the legal framework

Out of 6 Strategy specific objectives, 5 are defined in accordance with the LPS. As the LPS does not prescribe which elements a specific objective should contain, the definition in Article 2 of the LPS is the sole basis on which the subject conformance may be assessed.

<i>Specific objectives</i>		<i>S</i>	<i>M</i>	<i>A</i>	<i>R</i>	<i>T</i>	<i>Conformance with the LPS</i>
1.	Establishing an institutional framework and completing the legal framework for ensuring a coordinated management of the e-Government development	√	X	√	√	X	Yes
2.	Establishing interoperability between information systems of public administration bodies, bodies of the autonomous province and local self-government units	√	X	√	√	X	Yes
3.	Establishing essential electronic registers linked to other information systems of state administration bodies, bodies of the autonomous province and local self-government units	√	X	√	√	X	Yes
4.	Enabling new e-Services through the national e-Government Portal and other portals	√	X	√	√	X	Yes
5.	Training civil servants in ICT	√	X	√	√	X	No
6.	Establishing an open government	X	X	X	√	X	Yes

Careful consideration is warranted when defining specific objectives, so as to avoid an overlap, for one might mistake specific objectives for measures. This has, to an extent, happened in the case of the Strategy.

For instance, **Specific objective 1** is defined too broadly. This generally causes difficulties in determining the corresponding performance indicators, i.e. quantitative indicators on the basis of which the achievement of the objective will be assessed.

Similarly, *Training civil servants in ICT* under **Specific objective 5** may, at the first glance, serve well as a title of a specific objective. However, training may not be regarded as an objective in itself, but a measure or a group of measures for the achievement of another specific objective. In the case of the Strategy, that would be the establishment of interoperability, new e-Services or an open government.

Also, with regard to the **Specific objective 6**, it is debatable whether *Establishing an open government* should be defined as a specific objective or as a principle of e-Government functioning. The answer would depend on the scope of planned measures and activities. It may be argued that this specific objective of the Strategy is defined in accordance with the LPS, but that the scope of planned measures and activities did not justify the establishment of that specific objective.

Other specific objectives are defined in accordance with the LPS.

3.5. Performance indicators as defined in the Strategy and their status

No overall or specific objective appears to be fully SMART as prescribed in the Regulation. Most objectives are attainable and realistic, but none of them are measurable or timely. Also, most of the specific objectives are specific to a field of action of the Strategy, and only one overall objective is defined at a satisfactory level of specificity, and thus its achievement may be unambiguously linked to a specific field of e-Government.

Performance indicators are defined at the level of the implementation of the entire Strategy, but are not specifically linked to any overall or specific objective. Thus, they cannot serve as a basis for an evaluation of the successfulness of the achievement of overall or specific objectives. All three performance indicators are defined as outcomes, in the same manner in which performance indicators are defined for the purpose of evaluation of the achievement of specific objectives, but not as effects, as they are defined with regard to an overall objective. This shortcoming should be avoided in the next e-Government development document. Three years for implementation should be enough time to consider the impact of such a document on the society.

Performance indicators as defined in the Strategy:

1. 40% of citizens regularly use e-Government services,
2. 85% of commercial entities regularly use e-Government services,
3. e-Services are accessible both to users in Serbia and to users abroad.

3.5.1. First performance indicator

This performance indicator should have suggested looking at the scope of usage of e-Government services by citizens, and the target value of the indicator was set at 40% of citizens by the end of 2018. According to the data of the Statistical Office of the Republic of Serbia,⁷ 37.3% of citizens used e-Government services in late 2018, and 37.3% of citizens used Internet services instead of visiting the public institutions or administration bodies in person. It would be fair to say that this performance indicator has been nearly achieved. Nevertheless, even if the 40% target had been achieved, the data would not have given an answer about the extent to which citizens regularly use e-Government services, because the Statistical Office's research, through a questionnaire, only establishes if citizens used e-Government services at least once in the previous year, by visiting a website for the purpose of collecting information about a procedure which is *de facto* not conducted electronically.

3.5.2. Second performance indicator

This performance indicator was meant to bring focus to the extent of usage of e-Government services by commercial entities. There are no official statistical data which would accurately indicate to what extent this indicator is currently met. Due to a change in the method of submitting tax returns and the introduction of mandatory electronic submissions by the Tax Administration of the Republic of Serbia, the assumption is that all commercial entities use e-Government services provided by the Tax Administration. Also, all commercial entities which submit annual financial reports to the Business Registers Agency (hereinafter: the BRA) or participate in a unified procedure for the issuance of construction permits, also use an e-Service provided by the BRA. However, the definition of this indicator certainly does not refer to such services, but to e-Services to be facilitated as per the Strategy measures. Those would be services provided through the e-

⁷ Statistical Office of the Republic of Serbia (2018), Use of information-communication technologies in the Republic of Serbia, 2018.

Government Portal, by the ITE Office. Since the ITE Office has not provided businesses with the option of initiating administrative procedures electronically, the conclusion would be that the performance indicator has not been achieved.

3.5.3. Third performance indicator

This indicator's target group are e-Service users abroad. As it is linked to the previous two indicators, all the above observations also apply to it.

3.6. Redefining and evaluating the performance indicators in accordance with the LPS, in order to understand the true impact of the Strategy

In order to assess the true impact of the Strategy, possible performance indicators on the basis of which the level of implementation may be reviewed against concrete objectives are identified below. Whenever data required for the evaluation in accordance with such indicators were publicly available, an evaluation was performed. When they were not, the prevailing view was merely to list and to explain the performance indicators so that they may be considered for incorporation into the Programme. Whenever possible, mechanisms through which data necessary for evaluation may be provided will be identified.

3.6.1. Possible performance indicators for the Strategy overall objectives

3.6.1.1. Increasing the level of user satisfaction with public policies

Optimal performance indicators for this overall objective would be:

Option 1: E-Participation Index⁸ – assesses the use of e-Services through which public administration provides information to citizens (“e-information sharing”), interactions with stakeholders, i.e. everyone who has an interest in accessing such services online (“e-consultation”), and the participation of operators in the decision-making process and legislation and policy making. It is measured every two years.

Rationale: Data for the calculation of values of indicators are obtained through questionnaires, i.e. they are based on the surveyees' impressions. For that reason, the value of the indicator depends on the subjective views of the surveyees and their satisfaction with the provided services.

Level of implementation:

	2018	2016	2014	2012	2010	2008
Ranking	48	17	81	60	135	116

Conclusion: In view of the fact that the Strategy entered into force in 2015, when Serbia ranked 81st (in 2014), and that the ranking improved to 48th place in 2018 (the last year of its validity period), the level of satisfaction of public service users can be said to have increased and the objective largely achieved. Nevertheless, it should be noted that Serbia's ranking dropped from 17th to 48th place between 2016 and 2018. The value of the index for Serbia has increased, but more slowly than in the other countries, which is the result of a slower implementation of

⁸ United Nations, available at <https://publicadministration.un.org/egovkb/en-us/Data-Center>.

reforms. In that respect, Serbia's position has relatively worsened. Therefore, the future Programme should contain measures which will turn this falling trend around.

Option 2: Level of user satisfaction with the provided public e-Services – Data required to conduct an evaluation in accordance with this indicator is not available. This type of evaluation would, otherwise, provide the most accurate information about the extent to which citizens are satisfied with services provided through the e-Government Portal and other public administration portals, as it would allow users to make direct statements about the quality of the e-Services.

It is possible to establish two mechanisms for obtaining data for evaluation with regard to this indicator:

- **Mechanism 1 – Filling out the questionnaire:** Data for the calculation of indicators would be obtained through an e-Service survey which would be distributed to a representative sample of users. E-Service user experience may be descriptive (e.g. excellent, very good, satisfactory, poor or very poor) or, alternatively, numerical (on the scale from 1 to 10).
- **Mechanism 2 – Evaluation of services through the system:** After a public service has been delivered, users would make statements about several different aspects of the service by rating them on the scale from 1 to 10, and an average rating would be calculated for the given service. The final appraisal of the entire system of e-Services would be a weighted average of all appraisals of individual services, where the frequency of the use of that service in the total number of services would be used as the weight.

3.6.1.2. Reduction of the administrative burden for commercial entities and citizens

Optimal performance indicator for this overall objective may be:

Option 1: Percentage of decrease of administrative burden of businesses and citizens, due to the transition of public administration services from traditional to electronic – The indicator is measured by using the Standard Cost Model, which is a model for calculating costs of administrative burden on the basis of the time necessary for concluding individual administrative procedures, average labour price, frequency of conducting procedures and the need to recruit external labour or capital. Annual costs of administration at the state level are calculated for a specific period, and compared to percentage decreases over a set target period. The amount of administrative burden would then be measured against the Gross Domestic Product (hereinafter: the GDP).

Rationale: Proposed indicator fully matches the overall objective.

Level of implementation: In 2015, the administrative expenses constituted 3.6% of the GDP. Data on the administrative expenses in 2018 should be obtained from the Public Policy Secretariat of the Republic of Serbia (hereinafter: the Secretariat), which is competent for periodically measuring total administrative expenses.

Conclusion: Data for 2018 need to be collected to determine if there was any decrease in administrative expenses.

3.6.1.3. Improvement of the efficiency of public administration through the use of information-communication technologies

Optimal performance indicators with regard to this overall objective may be:

Option 1: Percentage of regular e-Service users – The indicator measures the extent to which users regularly use e-Services. In methodological terms, as it has already been stated, the Statistical Office of the Republic of Serbia measures how many citizens use Internet services instead of making personal contacts or visiting public institutions or administration bodies. In order to determine the percentage of regular e-Service users, it is necessary to define in greater detail the term ‘regular use’ and how data will be collected for evaluation.

Rationale: The proposed indicator points to the extent to which the use of e-Services has increased in line with the improvement of efficiency of the public administration with regard to the use of ICT services.

Option 2: Level of e-Government capacity building – The indicator points to the percentage of full, electronic administrative procedures and services which the public administration has started to conduct and provide to citizens and businesses (from the submission of an application to the adoption of a decision).

Conclusion: The indicator points to the extent to which the number of e-Services offered to citizens and businesses has increased due to the increase in efficiency, i.e. increased capacities of the administration to provide e-Services.

3.6.1.4. Extent to which public administration interoperability is established – National and cross-border interoperability (particularly with the EU countries)

Optimal performance indicators with regard to this overall objective may be:

Option 1: Level of establishment of interoperability at the level of the entire public administration – Measuring the percentage of administrative procedures in which the public administration does not demand the submission of data and documents of other public authorities, or they are implemented through the “one-stop-shop” system.

Rationale: The indicator makes it possible to determine the extent to which data and documents are exchanged in accordance with interoperability principles, and determine the extent of interoperability of the entire public administration.

Option 2: Level of establishment of interoperability between individual public administration bodies – Measuring the number of bodies applying interoperability standards, under the assumption that such bodies exchange data and documents by official duty only electronically.

Rationale: Indicator is used to determine the extent to which public administration bodies apply standards of electronic data and document interchange and thus improve the efficiency of the entire e-Government.

Level of implementation: In 2017, interoperability standards were achieved by 10 state bodies and 44 bodies of the autonomous province and local self-government units. In 2015, the number of public administration bodies which achieved interoperability standards was 4.

Conclusion: Having in mind that the number of bodies which achieved interoperability standards had multiplied, the objective has been attained.

3.6.2. Possible performance indicators redefined with regard to overall objectives of the Strategy

3.6.2.1. Establishing an institutional framework and completing the legal framework for ensuring a coordinated management of the e-Government development

This specific objective is set very broadly to cover a wide spectrum of measures and activities with various effects, and thus it is difficult to set a reasonable quantitative indicator. The most attainable indicators for measuring the achievement of this specific objective are indicators for measuring the overall objective 3.6.1.3. *Improvement of the efficiency of public administration through the use of information-communication technologies*

3.6.2.2. Establishing interoperability between information systems of public administration bodies, bodies of the autonomous province and local self-government units

This specific objective includes a key segment of the overall objective 3.6.1.4. *Extent to which public administration interoperability is established – National and cross-border interoperability*, in such a way that identical performance indicators may be used to measure its achievement.

3.6.2.3. Establishing essential electronic registers linked to other information systems of state administration bodies, bodies of the autonomous province and local self-government units

Optimal performance indicator with regard to this specific objective may be:

Option 1: Level of digitalisation of databases, records and registers of state bodies, bodies of the autonomous province and local self-government units – The indicator points to the percentage of databases, records and registers kept electronically in a machine-readable form.

Rationale: The indicator shows the extent to which the public administration digitalises the existing records and, thus, creates conditions for their mutual linking.

Level of implementation: In 2018, on the basis of a questionnaire survey on the sample of 17 institutions, it was established that 31% of databases, records and registers were kept in paper form.

Conclusion: In order to assess the extent to which the Strategy has contributed to the decrease of the number of records kept in paper form, it is necessary to obtain historical data on the extent to which the sampled institutions digitalised their registers and other records between 2015 and 2018.

3.6.2.4. Enabling new e-Services through the national e-Government Portal and other portals

Optimal performance indicator with regard to this specific objective may be:

Option 1: Online Service Index (hereinafter: the OSI)⁹ – UN Index measures the scope and the quality of e-Services. It is obtained by reviewing the national e-Government portal, as well as websites of the most relevant ministries.

Rationale: This indicator points to the progress in the development of additional services and the improvement of the existing ones.

Level of implementation: In 2018, the index value was 0.7361, and in 2014, it was 0.3937.

Conclusion: In view of the considerable progress relating to OSI, the e-Services have been considerably developed in the period since the adoption of the Strategy.

⁹ United Nations, available at <https://publicadministration.un.org/egovkb/en-us/Data-Center>.

3.6.2.5. Training civil servants in ICT

Optimal performance indicators with regard to this specific objective may be:

Option 1: Duration of electronic administrative procedures – indicator monitors the time required for administering the most frequent procedures.

Rationale: This indicator shows whether the training of employees reduces the administrative costs of the existing e-Services. In order to determine the level of implementation, it is necessary to select procedures and assess the change which occurred in the period 2015–2018 with regard to the time required to conduct the selected procedures.

Option 2: Percentage of employees trained to conduct electronic procedures and provide e-Services

Rationale: This indicator monitors the human resource capacity of public authorities responsible for delivering e-Services and procedures, and thus it makes it possible to determine the extent to which the capacity in question is developed. For the purpose of effective monitoring of indicators, it is necessary to first ascertain which employees are in the focus of the research, i.e. if it is only the percentage of employees who work on administrative matters in public administration bodies that is monitored, or if it is a broader range of employees.

3.6.2.6. Establishing an open government

Optimal performance indicators with regard to this specific objective may be:

Option 1: Global Open Data Index [insert link] – Measures the availability of different data sets of the public administration, how current or up to date the data are, data format, and the possibility of downloading.

The methodology is based on the research of compliance with the principle of the Global Open Data Charter. This Index is published annually by the Open Knowledge Network.

Rationale: The Index fully fits this specific objective, in view of the fact it has been narrowly defined.

Level of implementation: In measurements of the Index for 2016/2017, Serbia has a score of 41% out of the maximum 100%, sharing 41st place with Israel on the list of 94 countries. In 2014, Serbia ranked in 48th place with a score of 42%.

Conclusion: Although Serbia has relatively improved compared to the other countries, there has been no significant progress with regard to the standards of the Global Open Data Charter.

Option 2: Number of machine-readable datasets on the Open Data Portal – Measures the increase in the number of sets of machine-readable databases, which may be downloaded from the Open Data Portal.

Rationale: Indicator determines the availability of open data, which contributes to establishing an open government.

Level of implementation: 30 organisations had a total of 159 datasets on the Open Data Portal on 21 January 2019 Further analysis needs to research how many datasets have been updated.

Conclusion: Although there was no open data portal when the Strategy was being adopted, progress has been achieved in establishing an open government. However, it is still necessary to integrate a larger number of updated datasets.

4. ANALYSIS OF PUBLIC POLICY MEASURES PLANNED IN THE STRATEGY – CONFORMANCE WITH THE LEGAL FRAMEWORK AND THE LEVEL OF IMPLEMENTATION

4.1. Overview of the implementation of measures planned in the Strategy

As already pointed out, the Strategy and Action Plan 2015–2016 considerably deviate from methodological rules for the preparation of public policy documents. Furthermore, they are mutually inconsistent in terms of terminology, and the purposes of public policies in the Strategy are not defined in accordance with the LPS, while activities in the Action Plan are defined too broadly and do not refer to measures, but only the objectives of the Strategy. An analysis of these activities may lead to the conclusion that, according to the methodological rules prescribed in the LPS, the activities are usually and in fact measures, which is often obvious from their formulations.¹⁰ For that reason, those activities will be referred to hereinafter as “**measures/activities**” and the level of their implementation will be summed up hereinafter at the level of specific objectives of the Strategy.

Conclusions have been drawn about the extent to which elements of the Action Plan were defined in a methodologically accurate manner, i.e. the extent to which elements of the Strategy allow a review of the e-Government reform plan during the Strategy validity period, as well as the monitoring of their implementation. One of those conclusions is that the key problem during the evaluation of the execution of the Action Plan 2015–2016 was that activities had been defined in general terms, at the level of measures, leaving it unclear of what they consisted or who should implement them. This made it exceptionally difficult to determine the extent to which most of those measures/activities had been operationalised through activities or if at all implemented. In that regard, further characteristics of measures may largely be reviewed only through individual or group reports on their implementation. This makes it impossible to independently assess the results of the measures. It is recommended that future e-Government public policy documents should accurately define implementation activities.

Table 4 Overview of implemented measures/activities of the Action Plan 2015–2016¹¹

SPECIFIC OBJECTIVE	Number of implemented measures/activities	Number of partially implemented measures/activities	Number of non-implemented measures/activities	Total

¹⁰ For instance, the following “activities” were clearly measures as they included multiple activities: Completion of the legal framework of the e-Government within the scope of competence of the Ministry of Trade, Tourism and Telecommunications; Establishing a judicial information system in the field of international legal aid; Application of interoperability standards and protocols; Connecting state administration bodies, bodies of the autonomous province and local self-government units on the Service Main; Improvement of the ICT infrastructure of judicial bodies.

¹¹ See Evaluation table about the implementation of individual measures/activities pursuant to the Action Plan 2015–2016, as Appendix 1 to this Report.

1. Establishing an institutional framework and completing the legal framework for ensuring a coordinated management of the e-Government development	3	8	2	13
2. Establishing interoperability between information systems of public administration bodies, bodies of the autonomous province and local self-government units	5	1	0	6
3. Establishing essential electronic registers linked to other information systems of state administration bodies, bodies of the autonomous province and local self-government units	9	0	3	12
4. Enabling new e-Services through the national e-Government Portal and other portals	8	7	3	18
5. Training civil servants in ICT	0	3	2	5
6. Establishing an open government	2	3	2	7
Total	27	22	12	61

Table 4 above shows that 44% of measures/activities in total have been implemented. Another 36% of measures/activities have been partially implemented to a smaller or larger extent, while up to 20% of measures/activities have not been implemented. The main shortcoming of this evaluation is the fact that data on the implementation of measures/activities were obtained through a self-assessment of bodies in charge of for the implementation of such measures/activities, rather than on the basis of independent/objective indicators.

In terms of methodology, the result indicator refers to the level of measure, while outcome indicators are used for assessing the attainment of specific objectives. An analysis of the implementation of measures/activities showed that indicators for these measures/activities were defined at the level of outcome, while all other indicators were defined at the level of results, so it may be concluded that most performance indicators were accurately developed. Nevertheless, it was ascertained that indicators for almost 30% of measures/activities (17/61) were defined at the level of results, which is not appropriate for a concrete measure. In other words, the indicator for about a third of measures was accurately defined in terms of methodology, but its implementation did not allow for a full implementation of such measures/activities.

Below is an analysis of key measures which were not implemented or were partially implemented, but were deemed important in terms of reviewing the need to include them, in their original or redefined form, into the Programme which will plan the e-Government development for the next period. Analysed measures were, for the purpose of better visibility, represented in a table and numbered in the Action Plan. Each measure was accompanied with the following:

- **performance indicator** with baseline and target values. If the Action Plan does not indicate a relevant performance indicator, it will be redefined for the purpose of its potential incorporation into the Programme;
- **status of implementation** of the measure, which was determined on the basis of available administrative reports, such as the Report on the execution of the Action Plan 2015–2016, and on the basis of desk research of additional analytical materials available on websites of state bodies and other bodies;
- **comment**, which lists main conclusions of the analysis referring both to the methodological evaluation of the formulation of indicators, and essential characteristics of the same measures;
- **policy options**, which include options for the implementation of a concrete public policy relating to the measure in question, where it should be noted that options are subject to change depending on opinions of policy makers;
- **required data**, which need to be collected for the purpose of creating an analytical basis for a further analysis of options;
- **data source**, from which data are collected.

Table 5 Overview of characteristics of analysed measures

Title	9.1.1.1. Alignment of the Programme 2016–2018 budget with the e-Government Development Strategy in the Republic of Serbia 2015–2018 and the Action Plan for the implementation of the e-Government Development Strategy in the Republic of Serbia 2015–2016
Indicator	E-Government Development Strategy in the Republic of Serbia 2015–2018 and the Action Plan for the implementation of the e-Government Development Strategy in the Republic of Serbia 2015–2016 have been adopted (baseline value (BV): “not adopted”, target value (TV): “adopted”)
Status	Implemented: e-Government Development Strategy in the Republic of Serbia 2015–2018 and the Action Plan for the implementation of the e-Government Development Strategy in the Republic of Serbia 2015–2016 have been adopted (<i>The Official Gazette of the Republic of Serbia</i> , No. 107/15)
Comment	The indicator is incorrectly defined, as it measures the implementation of concrete activities instead of measuring the effects of implemented measures. Instead of measuring the effect depending on whether the budget is aligned with public policy measures listed in the Action Plan, it measured whether the Strategy and the Action Plans had been adopted. In addition, it is impossible to ascertain if the budget had been adjusted for the entire period of 2015–2018, as the Action Plans had been adopted only for the period of 2015–2016, while the Action Plan 2017–2018 did not contain a review of the amount of funds for the implementation of measures/activities. It should be noted that competent authorities have expressly stated that certain activities have not been implemented or have only been partially implemented, and that it was due to the lack of funds.
Policy options	The period 2015–2018 needs to be reviewed, together with the funds spent on the execution of planned measures and activities needs, and the funds lacking. In this manner, it would be possible to conclude which measures and activities were planned in line with the available budget funds.
Required data	If a measure is incorporated into the Programme, it is necessary to define the performance indicator for that measure, which may be as follows: Percentage of budget execution compared to the budget planned for the execution of the Programme in the period of execution of the Action Plan.
Data sources	Public administration bodies which are principal implementers of public policies – through the costing of measures and activities

Title	9.1.1.3. Establishing a special body for the coordination of e-Government at the level of local self-governments
Indicator	Number of members of the special body for the coordination of e-Government at the level of local self-governments (BV: 0; TV: 12)
Status	Not implemented: Special body for the coordination of e-Government at the level of local self-governments has never been established
Comment	The most likely reason to set up a special body for the coordination of e-Government at the level of local self-government is the coordination of reform activities in the field of e-Government. The implementation indicator was based on MPALSG's desire to set up a 12-member body, without clarifying if members of the coordinating body should be representatives of 12 different LSGUs or if the body should also include representatives of bodies at the national level. In addition, the question arises about the extent to which the coordinating body should include non-public entities, such as civil society organisations (SCTM, NALED, etc.).
Policy options	<p>This measure may be implemented as follows:</p> <ol style="list-style-type: none"> 1. Within the Coordination Council for e-Government, a subgroup may be set up for the coordination of e-Government at the level of local self-government, which would appoint members of LSGU. Administrative and technical support to the activities of the subgroup would be provided by MPALSG. 2. The Government may form a special coordinating body for the coordination of e-Government at the level of local self-government. 3. LSGUs may independently organise a joint body for the coordination of e-Government, with the support of the Government, donors and civil society organisations.
Required data	<p>Do principal implementers of the reform still focus on the formation of such a body?</p> <p>What are the benefits of establishing such a body?</p> <p>What are expenses of establishing such a body?</p>
Data sources	MPALSG and selected LSGUs – direct interviews

Title	9.1.1.13. Completion of the legal framework of the e-Government within the purview of the Ministry of Finance
Indicator	Analysis of required amendments to the existing laws and adoption of new laws, by-laws and internal rulebooks (BV: 0; TV: “over 80% of laws and by-laws aligned”)
Status	Not implemented: There have been no changes in the legislation within the purview of the Ministry of Finance. In accordance with the timetable of the introduction of the option to submit tax returns electronically, as prescribed in the Law on Tax Procedure and Tax Administration, business processes and by-laws are analysed for each tax form.
Comment	<p>The above Action Plan programmes the completion of the legal framework of 8 different ministries, the Ministry of Finance being the only which has reported that it has not conducted any activities to complete the legal framework concerning the e-Government. An analysis conducted by NALED suggests that there are two statutes within the Ministry’s purview which require amendments in the forthcoming period:</p> <ul style="list-style-type: none"> - Law on Republic Administrative Fees (<i>The Official Gazette of the Republic of Serbia</i>, Nos. 43/03, 51/03, 61/05, 101/05, 5/09, 54/09, 50/11, 93/12, 65/13, 83/15, 112/15, 113/17, 3/08); - The Budget System Law (<i>The Official Gazette of the Republic of Serbia</i>, Nos. 54/09, 73/10, 101/10, 101/11, 93/12, 62/13, 63/13, 108/13, 142/14, 68/15, 103/15, 99/16, 113/17, 95/18). <p>It is necessary to determine whether there are other statutes which need to be amended or adopted to the effect of improving e-Government.</p>
Policy options	<p>This measure may be implemented as follows:</p> <ol style="list-style-type: none"> 1. Completion of the legal framework of the e-Government within the purview of the Ministry of Finance – fully; 2. Completion of the legal framework of the e-Government within the purview of the Ministry of Finance, to the extent necessary for the implementation of the measures of the Programme.
Required data	<p>List of regulations that need to be adopted for the purpose of completing the e-Government legal framework within the purview of the Ministry of Finance?</p> <p>Which administrative skills are necessary for the preparation and adoption of such acts?</p>
Data sources	Ministry of Finance – direct interviews or questionnaires

Title	9.1.3.3. Establishing and publishing a national register of trusted service providers – Trusted List (certification bodies, issuers of time stamps, CRL and OCSP providers...)
Indicator	The list has been published online in accordance with the recommendation ETSI TS 119 612 V1.2.1 (2014–04) “ <i>Trusted Lists</i> ” (BV: “unpublished”, TV: “published”)

Status	Not implemented: In late 2015, the Directive concerning Trusted Lists of Certification Service Providers (TSL) was adopted on the basis of a newly adopted eIDAS regulation. A law is being drawn up which should be fully aligned with that regulation, which will serve as the basis for the adoption of the Trusted List, on the basis of new technical standards and specifications. Due to the expected adoption of new legislation – by-laws and technical specifications, the adoption of legal acts is still awaited, in order for tasks not to be duplicated, because, in accordance with the new legislation, TSL will list all trusted service providers, as well as trusted services they provide.
Comment	It is necessary to monitor the process of adoption of the Law on Services and regulations governing activity of trusted service providers, which are within the purview of the Ministry of Trade, Tourism and Telecommunications, and to ascertain how the national register of trusted service providers has been implemented.
Policy options	This measure may be implemented as follows: 1. Adoption of a regulatory framework for establishing the National Register of Trusted Service Providers 2. Establishing the National Register of Trusted Service Providers in accordance with the Directive.
Required data	It is necessary to ascertain if the decision maker intends to fully implement all elements of the TSL Directive, i.e. if such implementation will cover all levels of different providers. Recommendation: conduct a desk analysis of the existing Draft Law on Services, and draw a conclusion about the extent to which all the elements are contained in it.
Data sources	MTTT – direct interviews

Title	9.1.4.8. “e-Literacy for a Million Citizens” for using e-Services on the e-Government Portal – training citizens to use the national e-Government Portal
Indicator	Number of conducted training for citizens in using e-Government services (BV: 0; TV: 50)
Status	Not implemented: Implementation of the activity is postponed due to the inability to provide required financial means.
Comment	<p>The activity is oriented towards training e-Service users, i.e. citizens, to use such services, and for an efficient use of the national e-Government Portal. The activity is educational and informative, and thus oriented towards training citizens to use e-Government. Capacities are assumed to be raised for the group of citizens who are interested in using e-Services.</p> <p>It should be noted that the precondition for the implementation of this measure is the establishment of the e-Government functionality, without which the training will produce no effect. In view of the fact that citizens are not allowed to initiate administrative procedures electronically through the e-Government Portal, the implementation of activities under this measure should logically be postponed for the time when such a functionality will be established.</p>
Policy options	<p>This measure may be implemented/redefined to be implemented as follows:</p> <ol style="list-style-type: none"> 1. Implementation of information campaigns, through traditional media and social networks; 2. Implementation of basic training by NAPA 3. Implementation of basic and advanced training by NAPA 4. Organising training (basic and advanced), under projects financed from various sources, through outsourced instructors; 5. Combination of multiple options.
Required data	<p>Is this activity the priority and to what extent?</p> <p>What are benefits and costs of the implementation of this activity?</p> <p>Expenses are notably for the purpose of organising training, which entails considering the expenses of recruiting lecturers, renting premises, producing materials, etc.</p> <p>Benefits are directly reflected in the number of users who have undergone training and the level of skills and knowledge acquired through training (whether the basic information campaign has been provided, was it basic or advanced training, how the participants evaluate the training, etc.).</p>
Data sources	MPALSG, ITE Office and NAPA – questionnaires and direct interviews

Title	9.1.4.16. Establishing a central electronic system for collection of data from citizens on the quality of provided e-Government services
Indicator	Number of services which are subjects of the service quality assessment (BV: 0; TV: 20).

Status	Non-implemented: Portal www.dobrauprava.rs has been fully developed. No data have been obtained on the number of services which are subjects of the service quality assessment.
Comment	This is one of the key measures which have not been implemented, and which should provide data on the quality of e-Services provided to citizens. Such data need to be provided in order to efficiently measure the progress of public administration in providing public services of high quality. The above portal, www.dobrauprava.rs , provides the option to fill out a questionnaire which, <i>inter alia</i> , contains a question on the self-assessment of the quality of e-Services (rating: excellent, good, neutral, poor, very poor), but data on the results of the questionnaire are not available.
Policy options	This measure may be implemented/redefined to be implemented as follows: <ol style="list-style-type: none"> 1. Informational and educational measure for the actualisation of the existing portal; 2. Institutional and organisational measures for upgrading the existing portal; 3. Institutional and organisational measure for establishing the Central Electronic System for collection of data from citizens on the quality of provided e-Government services through the new Portal or another portal; 4. Periodic public opinion surveys.
Required data	1. Is the portal being used, and to what degree? What is the scope of the completed questionnaires? 2. What are the results of the questionnaire, i.e. the average rating on the prescribed scale?
Data sources	MPALSG and ITE Office - direct inquiry (questionnaire or interview)

Title	9.1.6.3. Alignment of the legislative framework with recommendations from the Open Data Readiness Assessment
Indicator	Prepared and adopted amendments of laws and by-laws regulating open data and alignment of the directive on the re-use of data (BV: 0; TV: Alignment of the Directive and open data are regulated by laws and by-laws)
Status	Partially implemented: An analysis of the best model for transposing the Directive on the re-use of public sector information into the national legislation, has been conducted. A working group to draft the amendments to the Law on Free Access to Information of Public Importance has been set up. Draft amendments to the Law have been drawn up for the purpose of alignment with the Directive. In addition, the legislative framework is aligned with the Directive on the re-use of public sector information.
Comment	Harmonisation with the Directive on the re-use of public sector information (Directive 2003/98/EC; Directive 2013/37/EU) is important for the purpose of achieving the level of data availability which is in accordance with the EU standards. As noted above, certain regulatory standards have been met, primarily through the adoption of the Law on Electronic Government, where the Law on Free Access to Information of Public Importance has not yet been amended in accordance with the Directive. In addition, in view of the complexity of the Directive, a question arises about the extent to which other regulations also need to be harmonised, both with regard to the functioning of e-Government and with regard to specific areas, such as education and health. In addition, the indicator which has been envisaged for monitoring the implementation of this measure/activity has been incorrectly developed. Namely, compliance with the Directive could not be measured effectively, primarily because it has not been made mandatory. It is unclear what the optimal level of compliance is required under the national legislation. On that note, the recommendation is that, if this measure is incorporated into the Programme, the result indicator should be adopted, and that indicator could be defined as follows: <i>Percentage of compliance of the national legislation with the Directive with regard to the analysis of the best model for the transposition of the Directive.</i>
Policy options	This measure could be redefined to be implemented as follows: 1. Amendments to the existing regulations and adoption of new ones in accordance with the analysis of the best model for the transposition of the Directive: 2. Amendments to the existing regulations and adoption of new ones in accordance with the analysis of the best model for the transposition of the Directive and specific material regulations for the purpose of achieving a higher level of compliance.
Required data	Which regulations need to be amended in order for them to be formally aligned with the Directive? Which are the areas that need the introduction of open data standards? Which material regulations need to be amended or adopted in order to align them better with the Directive? Which are capacities of the administration for regulatory activities at the national and local level? To what extent is the harmonisation of national legislation with the Directive required?

Data sources	MPALSG, ITE Office, MESTD and other state administration bodies to which the Directive refers – direct inquiries (questionnaires or interviews), SCTM and representatives of local government – interviews
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Title	9.1.6.5. Raising awareness about the importance of open data and encouraging the use of open data
Indicator	<ul style="list-style-type: none"> Number of citizens, commercial entities, media, institutions and civil society organisations covered by the open data campaign (PG: 0; CG: 500,000) Number of held workshops for commercial entities, civil society, academic institutions and media (BV: 0; TV: 15)
Status	<p>Partially implemented: Implementation of the activity has started.</p> <ul style="list-style-type: none"> A two-day workshop was held for members of the Open Data Working Group, promotional texts were published on social networks, Open Data Group was created on Facebook. Two workshops were held in the Ministry of Mining and Energy and the Environmental Protection Agency. <p>It is not possible to assess the number of citizens, commercial entities, media, institutions and civil society organisations covered by the open data campaign. Three workshops were held in accordance with the indicator for monitoring the implementation.</p>
Comment	<p>In the context of open government, promotion of the use of data for research and other purposes is important for familiarising all stakeholders with the option of using publicly available datasets. Otherwise, open data on the open government portal would not be very relevant. Bearing in mind that this activity is only partially implemented, it is recommended that it should be implemented in the future. In addition, indicators envisaged for monitoring the implementation of this measure/activity have been incorrectly developed. Namely, campaigns aimed at introducing a large number of entities with certain rights or obligations cannot determine the exact number of entities which have actually obtained additional information. In that regard, the recommendation is to incorporate this measure into the e-Government Development Programme, and to define the result indicator as follows: <i>Percentage of implemented educational and informative campaigns compared to the number of planned campaigns.</i></p>
Policy options	<p>This measure may be implemented as follows:</p> <ol style="list-style-type: none"> Implementation of information campaigns, through traditional media and social networks; Implementation of workshops for stakeholders, organised by the MPALSG and the ITE Office; Combination of options 1 and 2.
Required data	<p>What is the intended scope of the campaign? Which entities are the most important (citizens, research, business community, etc.)? Is the campaign strictly at the national level, or does it focus exclusively on local entities?</p>

	With regard to the chosen option, which capacities are required for the implementation of the campaign? Have the necessary budget funds/donor funds been allocated?
Data sources	MPALSG and ITE Office – direct inquiry (questionnaire or interview)

5. METHODOLOGICAL CONFORMANCE OF THE ACTION PLAN 2017–2018 WITH THE LPS AND THE REGULATION

The analysis has shown that the Action Plan 2017–2018 significantly deviates from the methodological standards established in the LPS and the accompanying Regulation. Although this was somewhat expected because the Action Plan had been prepared and adopted long before the LPS, there are nevertheless considerable methodological deviations even from the best international practice. This should be avoided in the future.

Before the conclusions of the analysis are presented, it should be noted that the Action Plan 2017–2018 implicitly introduced the concept of a group of measures, grouping individual measures around a common theme. This practice is appropriate because of the large number of measures, which need to be grouped around a common objective. Nevertheless, there were significant shortcomings in the method which was used.

5.1. Key shortcoming of the Action Plan: measures or groups of measures from the Action Plan are not linked to specific objectives of the Strategy, but developed independently

During the preparation of the Action Plan 2017–2018, the connection to overall and specific objectives established in the Strategy 2017–2018 was lost, as measures in it were not grouped around themes arising from such overall objectives. Instead, a different logic was applied and different things were prioritised. Due to this loss of a direct link between the Strategy and the Action Plan, the question arises about the extent to which the execution of the Action Plan 2017–2018 has really contributed to the achievement of objectives defined in the Strategy. This constitutes an essential discontinuity between the Action Plan and the Strategy, where the priorities of the former are different from those of the latter.

Subsequent linking of specific objectives to groups of measures indicates that the Action Plan 2017–2018 does not cover all specific objectives from the Strategy – two out of six specific objectives may not be linked to a group of measures, but, at best, to individual measures, and most often to activities. This reinforces the opinion that methodological shortcomings of this Action Plan may result in an unbalanced development of e-Government.

Below is a comparative table of specific objectives from the Strategy linked to the groups of measures from the Action Plan 2017–2018.

E-GOVERNMENT DEVELOPMENT STRATEGY	ACTION PLAN 2017–2018
Establishing an institutional framework and completing the legal framework for ensuring a coordinated management of the e-Government development	<ul style="list-style-type: none">- Improvement of the framework for the use of the electronic document- Multilevel system of authentication and introduction of systems facilitating the use of the certified electronic signature- Data storage centre and State Cloud- Enabling electronic archiving and long-term preservation of business records
Establishing interoperability between information systems of public administration bodies, bodies of the autonomous province and	/

local self-government units	
Establishing essential electronic registers linked to other information systems of state administration bodies, bodies of the autonomous province and local self-government units	- Establishing a records system – Metaregister and essential registers
Enabling new e-Services through the national e-Government Portal and other portals	- Electronic payment system (payment cards and e-Banking) - e-Government portals
Training civil servants in ICT	/
Establishing an open government	- Opening data generated in the course of public administration operations

5.2. The second important shortcoming of the Action Plan: measures are merely formulated, without definitions of all the elements prescribed in the LPS and the Regulation. Namely, institutions responsible for monitoring the implementation of individual measures were not appointed, nor was the budget allocated, or performance indicators (result indicators) established for the purpose of monitoring the implementation. Also, the nature of 13 out of 32 measures that were exhaustively listed like that (40.1%) does not justify their classification as measures. They should instead be considered activities, and be classified under differently formulated measures¹².

5.3. The third important methodological shortcoming: activities refer to a group of measures, rather than to individual measures. For that reason, not all individual measures have been elaborated to the same extent. This may have practical implications on the implementation of the Action Plan, which leaves certain activities out of the implementation of individual measures, or synthesises different activities into one, thus making it more difficult to evaluate such measures.

5.4. The fourth big shortcoming in the formulation of the group of measures in the Action Plan 2017–2018: there is a lack of budgeting and the sources of funding for their implementation are not identified. This is a step back from the previous action plan, and a deviation from the current legal framework and the best international practice. This makes it impossible to evaluate the financial efficiency of public authorities in the implementation of all measures, because funds that have been actually spent cannot be compared to the planned funds. In individual cases, activities and measures from the Action Plan 2017–2018 have not been implemented because public authorities have not allocated funds for their implementation¹³.

This apparent methodological inconsistency causes a crucial problem in strategic planning. Without a clear national strategic planning framework and without its consistent implementation in the planning process, the efficiency of the implementation of national strategies could decrease considerably, because the national policy makers may deviate from assumed objectives. Although a

¹² During the analysis of this Action Plan, measures from the Action Plan were assigned numbers by consultants who had evaluated the Strategy, and those measures were subsequently linked to the above activities.

¹³ For example, the activity “Improvement of the system of using the electronic certificate of Mol” from the group of measures 3 was postponed because the Ministry of Interior had not allocated funds in the budget for 2018.

revision of strategic objectives should be an integral part of the strategic planning process, it should be performed systematically, not *ad hoc*, as it was *de facto* done with this Action Plan.

6. ANALYSIS OF CONFORMITY OF ACTION PLAN 2017–2018 MEASURES WITH THE LPS AND THE REGULATION (COMPLIANCE WITH THE LEGAL FRAMEWORK AND THE LEVEL OF IMPLEMENTATION)

This section of the Report will present the analysis of key groups of measures planned in Action Plan 2017–2018. The Appendix to the Report is a table which presents an evaluation of the implementation of individual activities or groups of activities planned in this Action Plan.¹⁴ The Action Plan results have been assessed *vis-à-vis* the indicators as originally defined in the Action Plan. A large number of groups of activities could not be evaluated as “implemented”, because not all activities included in a concrete group of activities were fully implemented at the time of the evaluation. As already noted, the results of the implementation are at the level of the Strategy, and – according to the indicators redefined in line with international standards – they reflect the exceptional impact the Strategy has had on the e-Government development in Serbia primarily owing to the Action Plan activities. Thus, the Action Plan itself has, for the most part, been implemented successfully. It is necessary to plan the continuation of the implementation of the still non-implemented activities from the Action Plan for the next period, or to plan new measures which will replace them, for the purpose of a further improvement of e-Government.

6.1. Establishing a system of records – Metaregister and essential registers – this group of measures has been partially implemented

None of the planned registers have been established, but preparatory activities for their establishment have been implemented. In the case of 2 out of 4 performance indicators, target values have not been reached, because key measures for their implementation have not been implemented. For 2 indicators, data are not publicly available at this time.

At the level of implementation of activities prescribed in the Action Plan, out of 13 planned activities, 6 were fully implemented, four partially, while three have not been implemented at all.

TABLE 1 Action Plan 2017–2018 performance indicators for the group of measures 1

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Percentage of authorities which use data from the Central Population Register BV: 0, TV: 60	0
Percentage of authorities which update data in their registers through metaregisters BV: 0, TV: 50%	0
Percentage of data from records on Serbian citizens incorporated in the electronic form into the Central Data Storage and Processing System BV: Data not fully entered, TV: 50%	
Percentage of updated addresses in the Address Register BV: 53%, TV: 100%	

The Metaregister was not established before the expiry of the applicable Action Plan, but conditions are right to do it in 2019. Preparations for its establishment have taken place:

- Collection and systematisation of data which will be contained in the Metaregister;

¹⁴ See Evaluation table for the implementation of individual measures/activities pursuant to the Action Plan 2017–2018, as Appendix 2 to this Report.

- Adoption of the Regulation on the method of maintaining the Metaregister, which regulates the legal framework for its functioning. (It was initially planned that it should be regulated by the LPS, but it was decided during the execution of the Action Plan that it should be regulated by the Regulation.)¹⁵

In view of the fact that the Metaregister, as a public electronic register of all other registers and records in Serbia, ensures the *referential integrity* of public registers and records, its establishment is a precondition to establishing interoperability, and thus an efficient public administration. Since the Metaregister still has not been established, preconditions have not been met for a wide use of all the benefits of the e-Government. Also, in the previous planning and implementation cycles, it remained unclear whether a) the Metaregister should have a strictly informative function, i.e. providing fast and accurate information about which data in which register are considered original and reliable, or b) a step further would be taken, i.e. allowing automatic downloading of data from the main register, through a software which would be used to implement the Metaregister – all of which would ensure the updating of any changed data in other registers and records. Naturally, such a functionality should be a subject of a thorough analysis, knowing it would not be applicable to contract registers and similar registers.

As regards the establishment of the remaining registers, collected data indicate that activities towards their establishment have been partially implemented.

In December 2018, the Government of Serbia adopted the Draft Law on the **Central Population Register**, which would ensure the creation of a unified and updated register in the electronic form, and submitted it to the National Assembly for adoption. The Draft Law contains provisions regulating establishment and maintenance, content, method of use and other matters important for the functioning of the Central Register. According to the Report on the implementation of the Public Administration Reform Strategy in 2018, due to the excessive complexity of the compilation of data which would be contained in it, the Central Register was not established during Q4 of 2018, as stipulated in the Action Plan, and it is now expected to become fully operational on 1 September 2020¹⁶. The Central Population Register should compile all personal data from 13 official records, which have been so far individually collected by public administration bodies; this will mean that citizens will no longer be obliged to collect the documentation independently. Instead, data will be collected promptly through this register. This would simplify the provision of public services to citizens, shorten the time required for the collection of documents, and reduce the costs of providing public services. It is important to note that, in essence, this concerns records with limited datasets contained in the original registers. Thus, entering data in the Central Register has no constitutive effect, but only an informative purpose. It would appear that it has not been clearly indicated what problem is to be solved by establishing this register, in view of the following:

- 1) a similar functioning, but with a wider spectrum of personal data is already provided by the Service Main of the public authorities;

¹⁵ Website of the Government of the Republic of Serbia, <https://www.srbija.gov.rs/vest/356222/preciznije-uredjivanje-oblasti-rada-elektronske-uprave.php>.

¹⁶ Ružić, "Central Population Register – saving time and money, more efficient services for citizens", Ministry of Public Administration and Local Self-Government, available at: <http://mduls.gov.rs/saopstenja/ruzic-centralni-registar-stanovnistva-usteda-vremena-i-novca-efikasnije-usluge-za-gradjane/?script=lat>.

- 2) this functionality could also be implemented through the Metaregister which, *via* (a link to) the essential registers, could (re)direct to the location where datasets which are to be included in the Central Population Register are stored.

The register of local tax administrations, the register of home and foreign tourists residing in Serbia and the register of spatial units have still not been established, but preparations have taken place. According to data presented by the relevant working group in internal reports on the execution of the Action Plan 2017–2018, all registers of local tax administrations were being migrated to the central system located in the Data Centre.

The Address Register has not yet been established at the national level, but preparatory activities which refer to its establishment have been implemented (creation of software and adoption of the Regulation). The Law on the Register of Spatial Units and the Address Register remains to be adopted. At the local level, by 31 January 2019, the Address Register was updated in only 18 municipalities in the territory of Serbia (excluding the territory of the Autonomous Province of Kosovo and Metohija).

Implementation indicators have been defined in accordance with the LPS and the Regulation, and thus meet the prescribed criteria.

6.2. Improvement of the framework for the use of the electronic document – this measure has been partially implemented

At the level of implementation of activities prescribed in the Action Plan, out of 10 planned activities, four were fully implemented, two partially implemented, and four have not been implemented at all.

TABLE 2 Action Plan 2017–2018 performance indicators for the group of measures 2

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Number of by-laws adopted on the basis of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business BV: 0, TV: 15	12
Percentage of authorities which electronically exchange data contained in documents BV: 0, TV: 50%	0
Number of electronic application forms on the portals of the authorities BV: 120, TV: 500	
Percentage of staff trained in the application of an improved system of electronic office operations BV: 5%, TV: 30%	

- **Measure 6.2.1. Adopt the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, which is in accordance with the EU eIDAS regulation, and establish a network of trusted service providers**

In October 2017, the National Assembly adopted the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, which is in compliance with the EU legislation. This created a legal basis for the development of electronic business in Serbia. By

the adoption of this Law, the Law on Electronic Document (*The Official Gazette of the Republic of Serbia*, No. 51, 21 July 2009) and the Law on Electronic Signature (*The Official Gazette of the Republic of Serbia*, No. 135, 21 December 2004) were repealed, the implementation of which in public administration had only started in the procedure of submitting financial statements (2015) and in the unified procedure for issuance of construction permits (2016).

The Law specifically addresses the terms of electronic identification, electronic seal, electronic signature, electronic document, as well as trusted services and electronic preservation of documents, and aligns them with the EU Regulation 910/2014, which ultimately helps align the Serbian legal framework with the EU legislation.

The Law introduces the electronic seal, creating the possibility of depersonalisation of the electronic certificate, which is a more appropriate means of authentication in electronic administrative procedures and business activity of legal persons (as it accelerates the business activity and simplified administrative procedures). Namely, a certified electronic signature refers to a natural person, while a certified electronic seal refers to a legal person, so the use of the latter is more appropriate for business activities of legal persons and state authorities, as the same electronic seal of a legal person or a state authority may be used by various authorised persons, stating their name and position in the given document. Thus, it is either a certified electronic signature or a certified electronic seal that is used. Electronic seal should not be equated with a traditional seal which is prohibited from use under the Serbian legal system and has a completely different purpose. The certified electronic seal has still not been implemented in practice, and it is necessary to plan activities which will result in the implementation of this trusted service on the Serbian market.

An analysis of the legislation indicates that the newly adopted Law has created a favourable and complete legal framework for the use of the electronic document in all procedures, although specific regulations still may prescribe the obligation of state authorities to implement certain procedures exclusivity in paper form. Nevertheless, the conclusion of the analysis is that it is not necessary to modify all the individual regulations, and that, as of November 2019, it will be sufficient for the parties to an administrative proceedings to invoke Article 53 of the Law on Electronic Government (*The Official Gazette of the Republic of Serbia*, No. 27, 6 April 2018) which introduces the obligation of the entire public administration to enable electronic administrative proceedings. So, a public administration body will not be able to refuse to accept electronic submissions of documents and evidence in the form of electronic documents.

The Government has adopted 12 out of 17 by-laws regulating this area, and it would be reasonable to assume that the remaining by-laws will be adopted before the adoption of the new Programme or during the first months of the its implementation, at the latest.

- **Measure 6.2.2. Align all regulations prescribing the method of submission of documents in judicial and administrative proceedings with the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business**

The plan to implement this measure was abandoned during the implementation of the Strategy, even though it was of great importance for improving the legal certainty in administrative and judicial proceedings for citizens and businesses. It is necessary to review the possibility of incorporating this measure into the Programme.

- **Measure 6.2.3. Adopt a unified by-law for office operations**

The Government still has not regulated office operations of the public administration in a unified manner. Instead, there are two different regulations still in force, governing office operations and electronic office operations separately. The applicable Regulation on Electronic Operations was last amended in 2017, for the purpose of enabling the implementation of a unified procedure for the issuance of e-Construction permits. However, the adoption of a unified by-law would govern office operations of the public administration in a unified manner, providing a broader vision of how overall office operations should look.

The Government has set up a working group for the development of by-laws which will govern office operations of the public administration in line with the electronic office operations requirements. This group will also prescribe document retention periods in line with the Draft Law on the Archival Services and Archival Material which is currently in the procedure of adoption by the Government.

It is crucial for the process of office operations of the public administration to be regulated in such a manner that it covers all the steps: from the registry office (receipt of submitted applications and entering cases into records) to the Document Management System (hereinafter: DMSD, enabling electronic proceedings) to archiving in accordance with the new statute.

During the drafting of the Regulation on Office Operations, the following should be taken into consideration:

1. the Regulation should ensure that electronic office operations are established as base operations, i.e. as a principle of public administration, which will be achieved if the Regulation prescribes that:
 - 1) records shall always be kept in the electronic form rather than the paper form, regardless of whether the administrative proceedings have been initiated by an application in paper form (submitted to the registry office in person or by mail) or the electronic form (through the e-Government Portal or by an e-mail sent to the address of the public administration body);
 - 2) received paper documents shall always be digitalised, instead of electronic documents being printed, in order to create parallel case files (at first, all electronic documents in procedures carried out by the Ministry were printed, but this was abolished due to the implementation of a unified procedure for the issuance of construction permits);
 - 3) paper originals shall be returned to the party after being digitalised at the reception desk; otherwise, a digital folder will have to be created for them for the purpose of archiving (this recommendation will be disputed the most, but if it is not accepted, there will have to be huge “common archives” for various documents submitted at the “common registry offices”).
2. The Regulation must not use outdated terminology which brings to mind paper documents. The following words should no longer be used:
 - 1) *delovodnik* (case registry), *upisnik* (register), *otpremne knjige* (outgoing mail registry), *prijemne knjige* (incoming mail registry) – instead, there are electronic

- records with data which are automatically generated in the DMS electronic database and can be searched easily;
- 2) *zavodni broj* (entry number) – instead, the number of the case assigned by the information system shall be used;
 - 3) *košuljica predmeta* or *omot spisa* (case file cover or folder) shall be replaced by the term *evidencija dokumentacije u predmetu* (records of documents in the case file), because the case file is electronically formatted and does not need any physical folder/cover with a list of documents which would keep the documentary evidence from falling out of the case file;
 - 4) *parafiranje* (initialling), because the draft of the electronic document is not initialled, but approved by the system;
 - 5) *otisak pečata* (stamp imprint), because nothing can be imprinted on an electronic document – instead, a certified electronic signature or certified electronic seal shall be used, etc.
 - 6) The Regulation should not go into details while regulating the very process of document management, which should be unified and controlled at the level of DMS software.
3. The Regulation should also enable the exercise of the rights of citizens and businesses, regardless of which administrative procedure is used. It must not limit such rights by making it impossible to submit applications through the e-Government Portal because of a software that does not support it. Specifically, the Regulation should support the following two scenarios:
- 1) for each of the most frequent procedures identified in the Service Catalogue, provide a special scheme for submitting applications through the e-Government Portal, which will enable additional automatisisation of the process by enabling the following:
 - i. entering the type of the procedure and the competent authority through a drop-down menu;
 - ii. limiting the amount of proof which are to be submitted;
 - iii. making certain statements, etc.
 - 2) for all other procedures (the less frequent ones), a unique scheme should be provided – an application form for the e-Government Portal, which will ensure that the party can:
 - i. select the type of the procedure and the competent authority from the drop-down menu;
 - ii. enter the text of the application;
 - iii. select the number and the name of the proof that is being submitted.
4. The Regulation should enable an efficient receipt and filing of the case, by specifying the format of the document to be submitted and the actions to be taken by employees of the registry office, in four possible scenarios:
- 1) Receipt through the e-Government Portal:
 - A submitted application which initiates proceedings may be confirmed by the applicant through a highly reliable identification, only if this is prescribed in an amendment of the Law on Electronic Government. (Otherwise, it will

- have to be signed with a certified electronic signature, which is currently the case in operational procedures for the issuance of construction permits).
- Proof submitted together with the document must be in the electronic form (originally signed with a certified electronic signature or converted to e-Format in accordance with the law governing e-Documents – digitalised and subsequently signed with a certified electronic unique number).
- 2) Receipt by e-mail (Pursuant to Article 53 of the Law on Electronic Government, electronic proceedings are mandatory for the entire public administration, starting from 15 October 2019, which means that citizens must be given the option to initiate procedures by e-mail, if submission of applications through the e-Government Portal is not possible);
 - Both the submitted application and the proof must be in the electronic form (originally signed with the certified electronic signature, signed or converted to an e-format in accordance with the statute governing e-Documents – digitalised and then signed with a certified electronic unique number).
 - 3) Receipt at the registry office of administration bodies:
 - Application and proof submitted in paper form at the registry office shall be converted to an e-format by employees of the registry office, in accordance with the statute governing e-Documents: it shall be digitalised and then signed by the certified electronic signature of the administration body, and then entered into the system through the e-Government Portal. The case file shall be simultaneously entered into the system, and an automatically generated certificate of receipt shall be issued to the party.
 - 4) Receipt by mail – by registered letter – the same as under 3) above
 5. If competences for the classification of case files received through the e-Government Portal are correctly assigned:
 - 1) in the case of frequent procedures identified automatically in the Service Catalogue through the IT system (if they have been initiated through the e-Government Portal) or by employees of the registry office (if it has arrived by mail, e-mail or at the registry office); these are the only instances when an employee of the registry office may [need to] have special knowledge on how to classify the case file which has not arrived through the e-Government Portal. Note that competences, particularly in the case of entrusted tasks, are changed very often, which further prevents an automatisisation of the process (e.g. depending on the value of the case claim, the size of the building under construction, etc.)
 - 2) in the case of less frequent procedures, the case file should be sent automatically to the addressed authority which, if it is not the right authority, will forward the case file to the one that is the competent authority, and adopt an act on its lack of competence and assignment to the competent authority. (Less frequent procedures make up the majority of the procedures. They will never be entered into the Service Catalogue because they are rare, and often not clearly prescribed. Even the authorities often do not know who is competent for the implementation, so employees of the registry offices cannot be expected to know it.).

- **Measure 6.2.4. Regularly conducted training in e-Services for civil servants and citizens**

With project support of the Good Governance Fund of the Government of the United Kingdom, which was implemented through NALED, PriceWaterhouseCoopers and the European Policy Centre, the Government of Serbia implemented 10 training courses, training 137 attendees and 20 local self-governments, 18 state administration bodies, and 17 notary public offices¹⁷. Key project beneficiaries and participants in the implementation were the Ministry of Trade, Tourism and Telecommunications and the Ministry of Culture and Information, which were in charge of regulations governing this policy area.

Although this type of training was important for the ministries, it was not intended for all civil servants, nor was it continuous training of civil servants. It could be said that there was no adequate training of civil servants, in particular in LSGUs, public agencies and public enterprises. Bearing in mind that this is one of the key measures for establishing the e-Government in Serbia, as its implementation builds human capacities for the management of electronic operation processes, such activities should be implemented more intensely in the future, and cover more widely the employees in the public administration.

For that reason, priorities should be established with regard to the implementation of training in the forthcoming period. One of the priorities is certainly training employees in local self-government units who are to apply e-Government in the widest segment, followed by employees of public agencies and public enterprises who, within their respective offices, implement administrative procedures.

It should be noted that, starting from November 2019, it will be sufficient for a party in administrative proceedings to refer to Article 53 of the Law on Electronic Government, which introduces the obligation of the entire public administration to enable electronic administrative proceedings, so that a public administration body would not be able to refuse electronic submissions of documents and evidence in the form of electronic documents. A question arises: how will employees in the public administration, primarily in LSGUs, be able to rise to this challenge, when they do not possess essential knowledge on electronic operations?

To avoid any confusion, employees in the public administration will be able to implement electronic procedures through the Government's e-Government Portal only to the extent to which the ITE Office provides this functionality. In all other procedures which are not implemented through the Portal, employees in public administration will have to find a different way to ensure the receipt of documents and evidence in the electronic form. For that reason, they will also have to undergo training in basic solutions prescribed in the law governing electronic operations, and not only the solutions prescribed in the Law on Electronic Government.

Amending Article 53 of the Law on Electronic Government should be considered, for the purpose of extending the electronic proceedings implementation deadline for at least a year, since the limited scope of the implemented training has not equipped the public administration

¹⁷ Report on activities and results of the project "Towards a paperless administration" (September 2018), available at: http://www.pitajtekada.rs/documents/analize/5-lzvestaj_o_aktivnostima_i_rezultatima_projekta_Ka_administraciji_bez_suvisnih_papira.pdf.

staff to achieve this ambitious task. To that end, an amendment to the Law on Electronic Government could be planned as an activity under the Programme.

6.3. Establishment of a multilevel system of authentication and introduction of systems facilitating the use of the electronic signature – this group of measures has not been implemented

Data on current values are not publicly available for either of these two indicators, but the examination of the implementation of individual measures and activities suggests that neither of these indicators has reached its target values, as the technical and technological conditions for their implementation had not been met.

Thus, the conclusion is that this group of measures has not been implemented. Out of the six planned activities, one has been implemented, three have not been implemented, one has been deleted from the Action Plan, and it has been decided that one would be implemented in a decentralised manner, instead of being implemented at the national level through the Action Plan. On the basis of the above, it may be concluded that any progress in this segment of the e-Government development has been more modest than planned.

TABLE 3 Action Plan 2017–2018 performance indicators for the group of measures 3

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Number of accredited certification bodies which issue certified electronic cloud certificates BV: 0; TV: 2	0
Number of bodies which use a multi-factor authentication in procedures BV: 0; TV: 20	0

- **Measure 6.3.1. Establishing and popularising a unified way of identifying e-Government users, which will replace the identification/signature of the party in most procedures**

During the period of application of the Action Plan, no simpler methods of identification were established on the portals of public authorities. Although the Government has adopted by-laws providing for a simpler method of authentication (two-factor authentication on e-Government portals), at the moment, only highly reliable identifications are being performed, which is not optimal in terms of the speed of processes conducted with the public administration. Also, in view of the fact that simpler methods of authentication have not been established, no campaigns for their promotion have been organised, either.

- **Measure 6.3.2. Define required reliability levels of the identification scheme in accordance with the need to check reliability in certain procedures in the Law on Electronic Government**

The Regulation and by-laws governing this matter have been adopted. However, these regulations have not yet been implemented in practice. This mostly refers to the cloud signature and two-factor authentication on the e-Government portals. Also, the public authorities themselves have been left with determining the required level of authentication for using public services, instead of it being determined at the central level. Abandoning this measure carries certain risks, such as that different local self-governments may demand

different levels of authentication for the same service, which may cause chaos in the e-Government development in Serbia. Thus, this activity should be re-incorporated into the next Programme and defined at the central level.

- **Measure 6.3.3. Improve and standardise the technical solution which will make the certified electronic certificate compatible with all operational systems**

In view of the lack of funds in the budget of the Ministry of Interior, activities relating to this measure have been deleted from the Action Plan.

- **Measure 6.3.4. Standardise the technical solution for public administration platforms in order for every electronic certificate to be accepted in the provision of public services**

The Action Plan 2017–2018 plans for individual public administration bodies to define minimum levels of authentication of persons for certain procedures, primarily administrative procedures (intersectoral activity), which may not be optimal because, for instance, local self-governments may give different levels of authentication for the same type of services or for the same procedure, if this issue is not resolved at the national level.

Also, the model for the registration of e-Government users at the single electronic point (the method of establishing user's identity in communication with the e-Government) has not been established – whether it is assignment of a specific code, establishment of identity by camera, or another mode of identification.

6.4. Establishing an electronic payment system (payment cards and e-Banking) – this group of measures has not been implemented

Data on current values are not available for any of the three performance indicators, but it may be concluded, on the basis of an examination of the level of implementation of measures and activities, that current values are still at the level of baseline values, because measures which would enable progress have not been undertaken, i.e. technical and technological preconditions have not been fulfilled.

It may be concluded that this group of measures has not been implemented. Out of the four planned activities, one has been fully implemented, two have been partially implemented, and one has not been implemented at all.

TABLE 4 Action Plan 2017–2018 performance indicators for the group of measures 4

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Number of bodies which have the option of monitoring individual payments for procedures they implement BV: 0; TV: 50	0
Number of bodies which have enabled the system of using services electronically BV: 0; TV: 25	0
Number of POS terminals in administrative points BV: 1; TV: 30	1

- **Measure 6.4.1. Establish, through the Treasury Administration, an efficient system of recording/matching payments of all public service fees and taxes in all public authorities (code or reference number for personalisation of payments), enabling authorities to cross-check all payments and procedures quickly**

This measure has not been implemented. Public authorities still do not have the option of automatically identifying and matching payments with applications submitted by citizens, so proof of payment must still be submitted in a paper form for all services which cannot be fully delivered through the e-Government Portal. Since this measure has not been implemented, preconditions for public authorities to stop demanding that citizens and businesses submit proof of payment have still not been met. This is a considerable obstacle for the establishment of e-Government in the country.

Full implementation of this measure requires that public authorities issue unique reference numbers to citizens, which would be used for linking payments made by citizens with specific persons and cases. This may be done by adopting new regulations (by-laws) or amending the existing ones (primarily the Law on Republic Administrative Fees and the Law on Electronic Government) and requires the establishment of an automatic software solution which would allow for all of these processes to be conducted automatically. Note that without a timely assignment of the reference number – which would allow for a simple check in the electronic system to which authority a specific fee had been paid and for which administrative service –, it is impossible to implement this measure.

- **Measure 6.4.2. Enable prompt recording of payments made through e-Banking or mobile banking in real time**

This measure was abandoned during the implementation of the Strategy.

- **Measure 6.4.3. Abolish the obligation of the parties to provide a proof of payment**

The measure has only been partially implemented, since it is possible only for services which are provided through the e-Government Portal. For all other services, in line with the previous findings, the implementation of the measure has not even started. Submission of proof of payment is mandatory for citizens, while public authorities occasionally suggest to parties in proceedings that it is better to submit a standard receipt as a proof of payment than a bank statement. This suggests that public authorities are still conservative in their provision of public services.

Also, activities relating to the method of abolishing proof of payment have not been started yet. In view of the inertia in the behaviour of public administration bodies in Serbia, in addition to creating a system which would allow automatic matching of payments made by citizens for public services with submitted applications for the delivery of public services, some thought must also be given to any mechanisms which may allow public authorities to seek proof of payment even after this system has been established. This type of prohibition may also be prescribed in the Budget System Law itself, so it is necessary to consider if the activity of amending this Law for the purpose of providing for this prohibition should be included in the e-Government Development Programme or the Action Plan for its implementation.

- **Measure 6.4.4. Facilitate payment cards and other methods of electronic payment of charges, fees and other payments to authorities**

Other than the Republic Geodetic Authority and the BRA, the option of payment by cards through POS terminals has not been introduced to any other public administration body in Serbia. Local self-governments have demanded that this payment option is also introduced for payments for local public services, which has not been done yet.

This activity needs to be incorporated into the new e-Government Development Programme. In addition, there are suggestions that the costs of transactions should be borne by the Budget of the Republic of Serbia, in order to encourage beneficiaries, through a reduction of their transactional costs, to more frequently make payments for public services electronically. This solution has yielded great results in the collection of *Infostan* or utility fees (fees for services, such as remote heating, water supply, hot-water supply, etc.). Out of 8,000 public services which have been identified through analyses, only 400 may be carried out electronically but online payments for all of them are not yet possible. Thus, less than 5% of all identified public services may be paid electronically. Within the prescribed deadlines, there have been no amendments to statutes (Law on General Administrative Procedure and Law on Electronic Government) which would explicitly prohibit public authorities from demanding written proof of payment from parties for the provision of public services. Recommendation: these laws should also repeal provisions of all other laws which demand proof of payments from parties, in order to systemically resolve this matter, and make public administration bodies fully transition to electronic operations.

- **Measure 6.4.5. Introduce cashless payments at POS terminals of authorities for the purpose of simplification of procedures and reduction of misuse**

There are no data on whether this measure was implemented during the validity period of the Strategy, and its incorporation should be considered particularly in the cases when e-Government procedure cannot be initiated through the e-Government Portal, or when submission of applications at POS terminals of public administration is the only option for the parties.

6.5. Establishing a system of electronic archiving and long-term preservation of business documentation – this measure has been partially implemented

Data are not publicly available for either of the two performance indicators, but it may be concluded, on the basis of an examination of the implementation of measures and activities, that the target value has definitely not been achieved in the case of the first indicator, as none of the regulatory or technical and technological preconditions have been fulfilled. This group of measures has been partially implemented. Out of the five planned activities, four have been fully implemented, and one has not been implemented.

Note that, first of all, the law governing archiving of electronic documents has not been adopted, not has a by-law governing reliable electronic preservation of documents, and that such regulations are a precondition for a successful implementation of electronic archiving and reliable long-term preservation of business documentation in the electronic form.

As previously stated (Measure 2.3), the Archival Services and Archival Material Bill is currently in the Governmental adoption procedure, which is expected to finalise in the upcoming months. The same goes for by-laws which will further regulate reliable electronic preservation of electronic documents. However, it is not enough to adopt these regulations. They will also need to be implemented

successfully. This would entail consideration of the Programme planning measures and activities for the implementation of legal solutions, such as Article 37 of the LPS which prescribes the option of appointing a state authority as a trusted service provider by a Government decree. (This suggestion is elaborated in Measure 2.1.)

TABLE 5 Action Plan 2017–2018 performance indicators for the group of measures 5

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Number of accredited certification bodies which provide trusted services of long-term preservation and archiving of documents BV: 0; TV: 3	0
Number of authorities which use the system for long-term preservation and archiving of electronic documents BV: 7; TV: 100	

- **Measure 6.5.1. Legally regulate archiving of electronic documents and define which documents constitute archive materials**

The measure has been partially implemented. The Ministry of Culture and Information has prepared the Draft Law on the Archival Services and Archival Material and initiated a public debate. Nevertheless, there is a concern that the solution from the Draft Law may not ensure a full transition to electronic archiving, as the Law insists on keeping both archival material and documentary material in their original form. This is fundamentally the wrong solution which will not resolve the problem of expensive and unnecessary archiving of paper documents.

This problem has historically resulted in prescribing extremely short document retention periods, even though such documents should, in certain cases, be permanently preserved (e.g. court rulings and other proof of acquisition of property rights and other rights, etc.). Namely, due to the size of the archives, many documents have extremely short document retention periods. If they lose their copy of such a document, citizens and businesses are unable to get another copy, because the administration destroys them after the expiry of the retention period.

The right solution would be to make it possible for all documents to be preserved in the electronic form, regardless of whether they originated in the paper form or not, unless the paper documents are of cultural or historical significance. This would also enable archival material and documentary material to be converted to the electronic form, and preserved and archived in such a form. This shall, of course, only occur if longer retention periods are prescribed only due to the significance of the data contained in the documents. In this regard, this Law will not bring about any essential change in the approach to the archiving. The same problem arises with regard to the preservation of both business documents and private documents. There is no reasonable explanation for insisting on the original form, unless the paper document is of cultural or historical significance.

Note that the obligation to preserve documents in their original form will continue to cause unnecessary archiving costs to public administration bodies, even in the case of electronic procedures. This will happen because such bodies will be obliged to create a case file for the received paper documents (applications and proof), after their conversion to the electronic form.

To resolve the above problem, the following alternative measures could be incorporated into the Programme:

- Amendment to the Law on the Archival Services and Archival Material, with a view to prescribing the option to electronically preserve and archive documents which were originally in paper form, if longer retention periods are prescribed only due to the significance of the data they contain, rather than for any cultural or historical significance of the paper document itself; or
 - Introduction of e-Government, e-Justice and electronic business as primary activity of the public administration and judiciary, in order for documents to primarily originate in the electronic form, which entails a particularly broad and complex list of measures and activities.
- **Measure 6.5.2. Provision of services of reliable preservation of electronic documents, which will include digitalised documents, the paper originals of which may be destroyed if they do not constitute archival materials**

This measure has not been implemented. Note that the implementation of e-Government primarily depends on the establishment of **certified electronic delivery services** referred to in Article 54 of the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, and **services of reliable electronic preservation** of documents referred to in Article 62 of the Law, which are still to be established on the Serbian market.

In light of the experience of market inertia in the provision of certified trusted services (certified electronic signatures; certified electronic seal), the next e-Government Development Programme should provide for an activity for the purpose of the implementation of Article 37 of the Law, which stipulates that:

“A state authority may become a trusted service provider on the basis of a Government decree if it meets all the legally prescribed requirements for providing services”.

In other words, a special activity would be provided: Issuance of the Government decree which would define the ITE Office, the BRA, Ministry of Interior, or any other body which meets the requirements for providing trusted services, as a trusted service provider, for the following services:

- issuance of a certified electronic signature or electronic seal;
 - electronic delivery;
 - reliable electronic preservation;
 - other services necessary for the implementation of e-Government.
- **Measure 6.5.3. Analyse needs and capacities of public administration bodies for electronic archiving in line with the prescribed standards, particularly the compliance of the IT system with the prescribed data retention period and the method of updating the data formats with technological changes, in order to ensure a continuous access and use of data**

There are no data that this measure has been implemented, and it is necessary to consider the need to redefine it and incorporate it into the Programme.

- **Measure 6.5.4. Examine if retention periods for certain paper documents are reasonable, in order to avoid needless expenses. This is, for example, the case with storing control strips for issued fiscal invoices, which are mandatory to store for three years, but the quality of documents is such that their contents are illegible after less than half a year**

This measure is being implemented in the procedure of adopting the Regulation on Registry Material and Retention Periods, prepared by the MPALSG.

6.6. Establishing the Data Storage Centre and the State Cloud – this group of measures has not been implemented

Data are not publicly available for any of the performance indicators, but it is logical to assume that the value of first indicator, which refers to the number of public authorities accessing services in the State Cloud, is still 0, since the cloud has not been established yet. As regards the second indicator, it is quite certain that its value is higher than the baseline value (0) in view of the fact that – according to the data on the ITE Office website – this Centre stores data of the Ministry of Public Administration and Local Self-Government¹⁸, but it is not known if data of some other Ministry or another public administration body are also located in this centre. Thus, it could be argued that a certain progress in the implementation of this indicator has been achieved, but not that this progress is satisfactory.

As regards the level of implementation of activities and measures from the Action Plan, it may be concluded that the group of measures has not been implemented – out of 17 planned activities, two have been partially implemented, 12 have not been implemented, and one has been deleted from the Action Plan.

TABLE 6 Action Plan 2017–2018 performance indicators for the group of measures 6

PERFORMANCE INDICATORS	LEVEL OF IMPLEMENTATION
Number of authorities accessing services in the State Cloud BV: 0; TV: 30	0
Number of authorities which store their data in the state Data Storage Centre BV: 0, TV: 15	2

In August 2018, the first State Data Centre was established in Belgrade. Equipment of the Ministry of Public Administration and Local Self-Government is located in the centre, containing 30 million data from birth registers. There are plans to move data from the national register of citizens, as a part of the cooperation between the Ministry of Interior and the Ministry of Public Administration and Local Self-Government.

However, as of the time of the expiry of the validity period of this document, no other data storage state centre or state cloud has been established as prescribed in the Action Plan. Also, key activities which would enable their establishment have not been implemented: no analysis of the current

¹⁸ Website of the ITE Office, State Data Centre, 13 August 2018, <https://www.ite.gov.rs/vest/788/drzavni-data-centar-.php>.

situation, needs, or potential acquisition costs of hardware for the construction of the Data Centre has been conducted.

No amendments of regulations (primarily relating to information security) have been made in order to provide a legal framework for the establishment and the functioning of the Data Centre and the State Cloud. There has been no analysis of the optimal legal form of an agency which will ensure the functioning of the Data Centre and the State Cloud, which would provide the technical and human resources infrastructure necessary for the functioning of those agencies. The traditional state administration bodies are limited by factors of employment and salaries, which make provision of the necessary IT personnel difficult, if not impossible. It is also unclear whether and how any of the state bodies will be obliged to transfer their servers to the Data Centre, or if they will only be allowed to keep their backup databases.

For the above reasons, it could be said that the implementation of this measure has failed compared to what was initially planned, and that it is crucial for the e-Government Development Programme to provide for measures and activities which would ensure technical and human resources infrastructure for establishing e-Government in the country. Establishing a cloud within the public administration entails benefits such as a simple and prompt exchange of data and services between different government and public administration organisations in general, better protection of data from outside attacks or Internet abuse.

6.7. Improvement of the e-Government Portal – this group of measures has been partially implemented

Data about the implementation are not publicly available for any of the four performance indicators, but it may be concluded that target values for two of them (second and third) have not been achieved, in view of the fact that technical and technological preconditions for their implementation have not been fulfilled. Also, there are doubts if the target value for the fourth performance indicator has been achieved, since an examination of the Report on the implementation of the Action Plan for the Implementation of the Public Administration Reform Strategy, specifically the parts about the e-Government, does not show that any e-Services of the third level of sophistication have been established.

Data collected during the consultation process indicate that no e-Service has been established at this level through the e-Government Portal, and that, at this time, the unified procedure for the issuance of construction permit, implemented through the BRA, and procedures of submitting tax returns, are the only ones that meet this criterion. This leads to the conclusion that the progress relating to the improvement of the functioning of the e-Government Portal is considerably smaller than what was planned, and may be deemed unsatisfactory. Other e-Government portals (websites of public administration bodies, LSGUs, public agencies and enterprises) differ considerably in terms of contents and functionalities provided to the public administration.

At the moment, the main providers of e-Services are the BRA and the Republic Geodetic Authority, as well as local self-government units which have provided a certificate in accordance with the programme for certification of municipalities with favourable business environments, as their portals are, as a rule, more coherent and contain templates and sufficient information for the implementation of administrative procedures. However, except in the case of a unified procedure for the issuance of construction permits, none of the portals has provided e-Services of the third level of sophistication.

With regard to the implementation of measures and activities relating to the e-Government Portal itself, it may be concluded that this group of measures has been partially implemented. Out of 11 planned activities, three have been implemented, one has been partially implemented, and seven have not been implemented at all. The level of implementation: of activities is around 27%.

TABLE 7 Action Plan 2017–2018 performance indicators for the group of measures 7

Performance indicators	Level of implementation
Number of users of e-Services on the e-Government Portal BV: 1.200; TV: 60.000	
Number of local self-governments which apply standardised procedures established at the e-Government Portal BV: 0; TV: 165	0
Number of authorities which download data from official records through eZUP services BV: ?; TV: 270	?
Number of authorities which have established e-Services of at least third level of sophistication on their portals BV: 10; TV: 120	1

Note that implementation indicator no. 3: *Number of authorities which download data from official records through eZUP services* has a methodological shortcoming, as it is unclear if it is the possibility of downloading data from the records through the Service Main that is being evaluated, or if it is the download itself, i.e. the implementation of that possibility. Recommendation: the indicator is to be formulated in the future as follows: Number of users within the framework of public administration bodies, which enable an access to electronic registers and records through the Service Man for the purpose of downloading data.

During the period 2017–2018, the functionality of the e-Government Portal was not considerably improved.

- During the validity period of the Action Plan, the e-Government Portal was not redesigned or updated.
- Although it can be accessed from all devices, the e-Government Portal is not optimised for viewing/use on mobile devices.

The only planned activity which has been implemented is the adoption of laws and by-laws governing the functioning of the e-Government Portal throughout the chain of use, from users' contacts with the portal, to procedures relating to activities of public authorities.

Users also have the option to make electronic payments of the administrative fees for all services at the e-Government Portal, which may be fully delivered electronically, which constitutes a key functional improvement in 2018. Users have the option of making payments by payment cards of any bank which conducts its activity in the country.

One of the key shortcomings relating to the improvement of functionalities of the e-Government Portal is that nothing has been done in order to optimise the Portal for mobile devices. In order to implement this solution, a certified electronic cloud signature or another highly reliable mode of identification needs to be provided, and the Programme should provide for activities for achieving

this. Note that this is a strategic issue, and that this functionality is more difficult to provide than some other functionalities of the Portal.

With regard to this group of measures, activities should be planned for the forthcoming period, which will enable the following:

- that public administration services, including administrative procedures, are fully delivered electronically, through the e-Government Portal (from addressing authorities/submitting an application, to receiving an answer);
- that access to users is also enabled through mobile phones, bearing in mind that most potential users do not have the option of accessing e-Government through mobile phones.

The number of services on the e-Government Portal was increased by 313 in 2018, and there are now 1,023 services advertised by 152 bodies – 9 more than in 2017:

- 360 for businesses,
- 648 for citizens,
- 15 for state authorities¹⁹.

6.8. Opening data generated in the course of public administration – this group of measures has been implemented

This group of measures has been fully implemented. All four activities prescribed in the Action Plan relating to this group of measures have been implemented.

TABLE 8 Action Plan 2017–2018 performance indicators for the group of measures 8

Performance indicators	Level of implementation
Number of datasets published on the Open Data Portal in a machine-readable format BV: 5; TV: 120	159
Number of applications created on the basis of the re-use of data BV: 0; TV: 25	

The open data website has been redesigned and its functionality has been improved, so 150 machine-readable datasets can be found on the Portal, while the Action Plan prescribed that 120 datasets should be at the website by the end of 2018.

The Open Data Portal itself recognises that the quantity of data is limited. For example, data on elementary schools are available for the City of Sombor, but are not available for other cities and towns in Serbia. As regards data of local self-governments, they are available on the Portal only for Sombor and Šabac, but not for other cities and towns in Serbia. In addition, there is notable practice that data, once published, are not updated, which leaves the question: to what extent does this method of publishing data serve its purpose? Hackathons have also been organised for promotion, with the support of UNDP.

¹⁹ Report on the Implementation of the Public Administration Reform Strategy, Ministry of Public Administration and Local Self-Government, 2019.

7. INSTITUTIONAL FRAMEWORK UNDER WHICH THE STRATEGY WAS DRAFTED AND IMPLEMENTED

As regards the institutional framework under which the Strategy and its action plans were prepared and implemented, it should be noted that, during that period (in July 2017, the Directorate for e-Government – which was an authority within the Ministry of Public Administration and Local Self-Government – grew into the Office for Information Technology and e-Government (ITE Office)²⁰, which is competent for providing professional assistance with regard to information technologies and e-Government, both to the Government of Serbia and to public administration bodies and agencies within the Government, and to other public authorities and organisations and local authorities (autonomous provinces and LSGUs). In that regard, the scope of the ITE Office has been expanded, and it may be concluded that its establishment has initiated the process of decentralisation of capacities necessary for a coordinated and efficient e-Government development at all levels of public administration.

The above institutional transformation produced very positive effects on the implementation of the Strategy, since the ITE Office operationalised and intensified activities which were undertaken after its establishment in accordance with the Strategy, primarily through the implementation of the Action Plan 2017–2018.

Although the Regulation founded the ITE Office, it did not specify its legal form. Nonetheless, the ITE Office could be viewed as a Government agency bearing in mind that the legal basis for the adoption of the Regulation was Article 31 of the Law on Government²¹. However, the ITE Office could not be considered a public administration body under Article 2, paragraph 1 of the Law on State Administration,²² because it was not established by law. For the same reason, Article 34, paragraph 1 of the same Law does not allow it to be established as a special organisation with a legal personality. In any case, the Serbian Government should address the issue of the ITE Office legal form in the next cycle, if it intends to grant it operational competences with regard to the implementation of future institutional public policy measures aimed at e-Government development. Note that Article 34, paragraph 1 of the Law on State Administration prescribes that a special organisation may be organised in another form, not only as a secretariat or an institute, whereas Article 34, paragraph 3 prescribes that it could gain legal personality as prescribed by law. If the [official] position is that the ITE Office should gain the status of a legal person in order to facilitate further development of e-Government, then this status would have to be defined under a statute. This, in turn, would support the argument that the ITE Office should be exempted from limitations of public sector employment and salaries as a solution to the problem of IT staff deficit.

²⁰ By adopting the Law amending the Law on Ministries (*The Official Gazette of the Republic of Serbia*, No. 62, 26 June 2017) and the Regulation on the Office for IT and e-Government (*The Official Gazette of the Republic of Serbia*, No. 73/17), that directorate was transformed into the Office for IT and e-Government.

²¹ The Law on Government (*The Official Gazette of the Republic of Serbia*, Nos. 55/05, 71/05 – correction, 101/07, 65/08, 16/11, 68/12 – CC, 72/12, 7/14 – CC and 44/14).

²² The Law on State Administration (*The Official Gazette of the Republic of Serbia*, Nos. 79/05, 101/07, 95/10, 99/14, 30/18, 47/18).

IV CONCLUSIONS AND RECOMMENDATIONS RELATING TO THE DEVELOPMENT OF THE PROGRAMME

This part of the Report will summarise the findings of the Impact Assessment and include recommendations relevant for the preparation of the Programme 2020–2022. The Impact Assessment and the recommendations will be presented per most significant identified planning elements, in accordance with the identified practices and the positive law framework relating to the planning system.

The conclusions and the recommendations will be presented in four sections:

- 1) Strategy Planning elements and recommendations for the improvement of the Programme development process, the Programme form and contents;
- 2) Action Plans planning elements and recommendations for the improvement of the form and the contents of the Action Plan which is to be adopted with the Programme;
- 3) Strategy measures to be incorporated into the Programme;
- 4) Obligation to implement an impact analysis of public policy measures.

1. STRATEGY PLANNING ELEMENTS AND RECOMMENDATIONS FOR THE IMPROVEMENT OF THE PROGRAMME DEVELOPMENT PROCESS, THE PROGRAMME FORM AND CONTENT

The previous part of the Report analysed the basic planning elements of the Strategy and the deviations from the methodological rules prescribed in the LPS and the Regulation. In view of the time which passed between the adoption of the Strategy and the adoption of the legal framework of planning system, all observed deviations were mostly expected. The recommendations made primarily serve to ensure the continuity of the e-Government development planning.

Conclusions relating to methodological oversights in the Strategy and recommendations made during the preparation of the Programme focus on the following key elements of the formulation of public policies:

- 1) analysis and description of the current situation;
- 2) defining overall and specific public policy objectives;
- 3) defining public policy measures;
- 4) implementation of the consultation process and reporting.

1.1. Analysis and description of the current situation

According to Article 10 of the Regulation, an analysis of the current situation or state of the subject policy area shall be conducted before the drafting of the public policy document commences; it shall serve as the basis for determining options to be considered in the following stages of the analysis, and it shall include a projection of the desired state (identification of changes to be implemented under the policy document). The same Article also elaborates on the scope of the analysis, i.e. what the concrete results of the analysis ought to be. Furthermore, the Regulation²³ prescribes the method of presenting the results of the analysis of the current situation in the text of the Strategy or the Programme. Therefore, an analysis of public policies in the field of e-Government, including an analysis

²³ Article 55, paragraph 1, point 3.

of the performance indicators of those policies, must be included under this section of the *ex-post* Impact Assessment.

1.1.1. Conclusions relating to the Strategy

In view of the standards prescribed in the LPS and the Regulation, it could be said that the current situation is only partially described in the Strategy. This analysis is primarily presented as an overview of the relevant regulations and a qualitative assessment of the implementation of a previous public policy document. Also, an assessment of the level of achievement of objectives on the basis of performance indicators is only partially presented in Part 4.1. *Assessment in the field of e-Government*. Moreover, the Strategy qualitatively describes the situation in subareas relevant for the e-Government, but does not present any quantitative indicators, the assessment of which may be used to determine the state of the e-Government at the time of adoption of the Strategy. This is a major oversight and a deviation from the methodological rules on the description of the current situation.

In addition, the current Strategy does not contain an analysis of international competitiveness, or an identification and a clear classification of the problems, causes and consequences which the public policy objectives and measures have been defined to address.

1.1.2. Recommendations for the Programme contents

In order to be aligned with the methodological rules prescribed in the Regulation, the Programme should contain a description of the current state of e-Government, including information about the results of the current Strategy Impact Assessment. The same section of the Programme should include an assessment of the achievement of the objectives from the applicable Strategy, where the level of implementation of performance indicators relating to such objectives should be stated.

The section should also identify problems in the development of e-Government, including problems in the implementation of the Strategy, together with a description of the need to resolve the problems and achieve the desired state through the implementation of the Programme. It is particularly important to state which of the expected results of concrete measures planned in the Strategy have not been achieved, and why.

The description of the current situation should refer to the main indicators to be monitored in the field of e-Government, and an explanation why these indicators are deemed adequate. In addition, values of such indicators for the latest calculation period (as a general rule, for the year preceding the year when the Programme was adopted) should be stated. An overview of main indicators should be complemented by including and analysing international competitiveness lists and including a comparative analysis with other national economies, with a view to examining the level of Serbia's international competitiveness in the field of e-Government.

The description of the current situation must be additionally complemented with an analysis of the relevant public policy documents and regulations which directly impact the state of e-Government, and which may affect the implementation of the Programme.

1.2. Defining overall and specific public policy objectives

Article 2, paragraph 1, points 11) and 12) of the LPS define the terms *overall objective* and *specific objective*, where the Regulation further prescribes the method of establishing such objectives. In addition, Article 13, paragraph 2 and Article 15, paragraph 2 of the LPS prescribe that a strategy, as a

general rule, has one overall objective and up to five specific objectives, while a programme, as a general rule, has one overall objective and up to three specific objectives,

In accordance with the Regulation, overall objective is defined as a projection of the desired state at the level of the society in a certain field of planning and implementation of public policies. Specific objectives are projections of the desired state which contribute to the achievement of the overall objective, and they are to be attained through the implementation of measures/groups of measures contained in a public policy document or relating to a specific objective. It is prescribed that overall and specific objectives shall be established in a public policy document in such a manner that they are specific, measurable, attainable, realistic and timely, which confirms that the **SMART** approach is used for defining objectives.

1.2.1. Conclusions relating to the objectives of the Strategy

Objectives of the Strategy are listed in the text of the Strategy, but measures and activities in the Action Plans do not refer to these concrete objectives. In total, 4 overall objectives and 6 specific objectives have been defined, which deviates from the rule prescribed in the LPS, particularly bearing in mind that the Strategy contains public policies designed for the development of e-Government which is a subarea of a wider planning area – the development of [the entire] public administration. In accordance with the planning rules subsequently prescribed in the LPS, the overall objective should have been incorporated into the Strategy or derived from any of the specific objectives of the then applicable Public Administration Reform Strategy. In addition, the analysis showed that there was no strong link between the overall and the specific objectives, and that all the objectives were stated independently from each other, where effect/outcome indicators were not stated for any of the objectives, even though this was prescribed as an obligation in Article 2, paragraph 1, point 14) of the LPS. In this regard, the main conclusion of the analysis is that, compared to the stated objectives, it is impossible to draw any concrete conclusions about the attainment of objectives without performing an evaluation in compliance with additional/redefined performance indicators.

The *ex-post* Impact Assessment presented in this Report has shown that Serbia has considerably improved its e-Government during the period of validity of the Strategy. Nevertheless, the impact of concrete measures from the Strategy on such progress is still disputable, due to incorrectly defined performance indicators with regard to these measures. For that reason, measurements during the Impact Assessment were conducted with regard to relevant indicators which were established during the analysis.

As regards overall and specific objectives, it has been concluded that none of the objectives of the applicable Strategy has been correctly defined in accordance with the Regulation.

The Strategy partially meets the standards prescribed in the LPS and the Regulation. The Strategy contains a vision and an analysis of the current situation as prescribed in the LPS. The Strategy also clearly establishes overall and specific objectives as the main constituent elements of planning, as well as performance indicators as the instruments for monitoring the progress.

Although the Strategy and the Action Plans, as accompanying planning documents, had been prepared considerably before the adoption of the LPS and the Regulation, it is necessary to align them with the existing legal framework in terms of methodology.

The vision has not been fully defined in accordance with Article 55 of the Regulation, as it does not define the projection of the state of e-Government in Serbia, but instead points out the importance of e-Government to the improvement of the quality of work of the public administration in general.

Only one overall objective – objective 3 – is defined in accordance with the LPS, i.e. it represents the desired state on the level of the society with regard to the area in which the Strategy functions. The remaining three objectives have not been defined in accordance with the LPS, as they do not specifically refer to the policy area in which the Strategy already functions, but instead refer to a situation which may be the result of actions and policies in other areas. Also, the established objectives largely deviate from the SMART approach to the formulation of objectives. Thus, the determination of indicators of their implementation and of the overall impact of the Strategy requires a detailed analysis of the other planning documents.

None of the 6 specific objectives meet all criteria listed in the Regulation. None of the objectives are defined in such a manner to be measurable and timely. In addition, the objective 6 *Establishing an open government* is not defined accurately. Only one overall objective is defined at a satisfactory level of specificity, and thus its achievement may be unambiguously linked to a specific field of e-Government.

Number of overall and specific objectives deviates from the number prescribed in the LPS. Instead of one overall objective and up to five specific objectives, the Strategy contains four overall and six specific objectives. An excessive number of objectives dilutes the efforts and the focus of the public administration. Instead, the recommendation is to focus on fewer objectives which would bring about a real change in the functioning of the public administration.

No clear link has been established between the overall and specific objectives. Specific objectives are not an elaboration of each overall objective individually. Instead, they have been defined independently from the overall objectives. Thus, the extent to which achievement of the specific objectives contributes to the achievement of the overall objectives is not directly visible. In addition, looking at the ratio of the overall objectives and the specific objectives in the Strategy to those recommended under the LPS, it may be concluded that the overall objectives are not sufficiently operationalised through specific objectives, and that their elaboration is poor. This should be avoided in the next planning cycle.

A direct link is also missing between the established objectives and the performance indicators. Performance indicators have not been developed for each of the overall and specific objectives individually, but instead for the Strategy as a whole. Thus, in order to consider the actual state of affairs in the development of e-Government in the country, it is necessary to establish a set of new implementation indicators, which would reflect the vision and the objectives of the Strategy, and also enable the assessment of this development.

All three performance indicators of the Strategy are defined at the level of outcome, but not at the level of effect, as prescribed in the LPS, bearing in mind that it is a long-term strategic document. This is a serious omission in the planning, as it prevents assessing the actual effects of the Strategy implementation and the status of e-Government development. This omission should be eliminated during the preparation of the Programme. Three years for the implementation of the Programme should be enough time to consider its wider impact on the society, considering that numerous measures and activities have already been undertaken through the implementation of the previous Strategy.

1.2.2. Recommendation for defining Programme objectives

In accordance with the research conducted prior to the compilation of this Report, the Working Group for the preparation of the e-Government Development Programme 2020–2022 (hereinafter: the

Working Group) and the e-Government Coordination Council (hereinafter: the Coordination Council) have agreed to define the overall objective of the Programme as follows: *Development of an efficient and user-centric administration in a digital environment*. This definition is deemed to be in full compliance with the LPS and the Regulation.

The process of analysis also defines areas which have been found to be of special importance for the development of e-Government, which are:

1. development of e-Government infrastructure;
2. ensuring interoperability;
3. improvement of legal certainty in the use of e-Government;
4. increase e-Government accessibility to citizens and businesses;
5. open data in e-Government.

In view of this proposal, the Working Group and the Coordination Council have agreed that the specific objectives be defined as follows:

1. Development of e-Government infrastructure and ensuring interoperability;
2. Improvement of legal certainty in the use of e-Government;
3. Increase of e-Government accessibility to citizens and businesses by improving customer service;
4. Open Data in e-Government.

Note that the specific objective 1 could be split into two specific objectives. In this case, the objective concerning the e-Government infrastructure and the other concerning interoperability would be defined separately. Bearing in mind that the interoperability serves the purpose of the infrastructure development, a unified specific objective may be defined, or it may be divided into two objectives, depending on the scope of reforms planned for these policy areas.

Specific objective 4 is important for a very specific reason: open data are directly linked to the increase of e-Government accessibility to citizens and businesses. Thus, it should be formulated as a measure, in accordance with the methodology. On the other hand, in view of the importance and the scope of open data measures planned for the forthcoming period, a specific objective closely related to open data may be defined instead.

As stated above, pursuant to the LPS, the Programme should contain up to three specific objectives. It is recommended that there be no large deviations from the formal requirements, and that it is specifically explained why the Programme will contain four specific objectives.

Article 19 of the Regulation prescribes that performance indicators shall be formulated with regard to the objectives, in order to measure success in the achievement of the desired change seen in the difference between the initial situation and the situation after the implementation of public policy measures. Effect indicators shall be defined for the purposes of monitoring the overall objective, whereas outcome indicators shall be defined for specific objectives, quantitatively expressed and in accordance with the SMART approach²⁴. It is prescribed that indicators may be qualitative only in exceptional cases, when there is no adequate quantitative indicator for a certain objective.

Finally, the source of verification/source of data must be stated for each indicator, on the basis of which the achievement of established objectives will be measured. To apply indicators, the baseline value and the baseline year need to be defined, as well as the target value which is set against the baseline value.

For the purposes of this Report, options for indicators which may be relevant to the overall and specific objectives have been proposed. This proposal is presented in the Annex.

²⁴ The same as for defining objectives, SMART approach shall be used for creating indicators, requiring from indicators to be Specific, Measurable, Attainable, Realistic and Timely.

1.3. Defining public policy measures

Public policy measures and elements of their analysis are prescribed in detail in Articles 24–30 of the Regulation. Article 24 of the LPS defines measures as a set of key interconnected activities which shall be undertaken for the purpose of achieving an overall or specific objective, or desired performance of the public policy. The LPS further prescribes the types of measures (regulatory, incentive, informational and educational, institutional-management-organisational and measures for providing goods and services by participants of the planning system, including public institutions), as well as the manner of formulating such planning elements. Article 53, paragraph 1 of the Regulation prescribes that measures may be “combined”. Thus, it can be argued that a type of concrete measure is determined on the basis of activities which are crucial for its implementation.

It is important to note that, in accordance with methodological rules prescribed in the LPS and the Regulation, public policy measures are defined in the very text of the Strategy or Programme, and further elaborated through the activities from the Action Plan.

The LPS recognises the option of implementing measures within the framework of certain projects but does not strictly prescribe if and in which manner such projects shall be incorporated into the text of the Programme/Action Plan. In this regard, there is still the possibility of listing and elaborating on certain projects in the text of the Programme, where measures planned in the Programme shall be implemented in accordance with these projects. There is also the possibility of presenting such projects through the Action Plan, through the identification of sources of funding which are used for financing concrete measures and activities.

1.3.1. Conclusions about the Strategy

Measures for the achievement of the overall and the specific objectives are not listed in an organised manner in the text of the Strategy. In the description of individual specific objectives, certain public policy measures may be identifiable, but may not be specified. As such their importance for the achievement of a specific objective are not be determinable.

The analysis of the impact of measures on natural and legal persons and the budget is not presented in the text of the Strategy, and thus the expected overall impact of the adoption of the Strategy cannot be assessed adequately. In the Strategy performance indicators, on the basis of which the implementation of individual public policy measures would be monitored, were also not listed.

Implementation of public policy measures of the Strategy has been particularly analysed with regard to both Action Plans for the implementation of the Strategy, which has been presented in detail above.

As regards the Action Plan 2015–2016, it has been concluded that 95% of activities are public policy measures in nature, and that performance indicators for them have been defined at the level of results. Such measures/activities were not further elaborated in the Action Plan, which prevents any evaluation of the implementation of activities which did factually occur. According to the reports of the competent institutions, only 20% of the measures/activities have not been implemented. This information is not verifiable for the reasons stated above, so the said reports have to be taken at face value. In addition, it is important to underline that, even though indicators are defined at the level of results, indicators for approximately one in three (30%) measures/activities have not been defined in a methodologically accurate manner, or do not match the nature of that measure/activity.

As regards the Action Plan 2017–2018, it has been concluded that this Action Plan has introduced groups of measures. In this regard, it considerably differs from both the methodological rules and the previous Action Plan. Thus, activities are presented at the level of measures, without any clear

reference to concrete measures. In total, 36 measures are defined in the cited groups of measures, 13 of which were defined as activities (a lower planning element). Indicators are defined at the level of results for each group of measures, and there are 23 of them in total. External evaluation is enabled for 15 indicators. It has been found that the target value has been achieved only with regard to one indicator. Bearing in mind that indicators are defined at the level of groups of measures, it has been made impossible to monitor the implementation of individual measures. Out of 70 activities which have been defined for the purpose of the implementation of groups of measures, a third of them have been found to have been fully implemented, while another 15% have been partially implemented. Approximately 50% of activities have not been implemented yet.

1.3.2. Recommendations for the formulation of measures from the Programme and indicators at the level of measures

Public policy measures should be defined in the very text of the Programme, with mandatory additional elements, or implementation indicators, baseline values, target values and sources of verification of results. It is important to note that, in accordance with Article 58, paragraph 1, point 4) of the Regulation, a result indicator and the method of verification of that result must be defined for each measure.

Measures should be formulated in such a manner that it can be ascertained, from their very title, towards which result they strive, and whether their purpose is the achievement of the specific objective under which they are planned. Indicators for public policy measures should be defined at the level of results, and must absolutely serve the purposes of measures, i.e. it should be possible to draw unambiguous conclusions about the implementation of a measure on the basis of monitoring its indicator. The recommendation is that, as a source of result indicators, publicly available databases or reports be listed with a view to achieving a higher transparency and enabling an independent evaluation of these measures.

The type of each public policy measure should be defined on the basis of the prevailing type of activity which is used for achieving results at the level of measures. In practical terms, if the prevailing activities for a measure are activities of establishing institutional capacities (e.g. establishing various registers), this measure should be classified as an institutional-management-organisational measure, and included as such in the Programme and the Action Plan. On the other hand, if a measure entails activities which are institutional-management-organisational activities (e.g. establishing the Data Centre) and activities which are informational and educational (e.g. training in the State Cloud, etc.), perhaps the better solution would be to divide the measure into two different measures, and to define separate result indicators for each of them. Alternatively, such a measure should be classified as an institutional-management-organisational measure, because that type of activities is prevailing by virtue of its significance for that measure. In this case, efforts should be made to classify measures under specific objectives which contribute to their achievement. For instance, different types of training for employees of the public administration may contribute to the achievement of different objectives. Some training affects the achievement of the interoperability of the public administration, others affect the legal certainty for the user, while others affect open data. Thus, the results of different training will be measurable at the level of different specific objectives, and activities such as different training should not be unified into a single measure just because they belong to the same type of measure.

1.4. Implementation of the consultation process and reporting

Pursuant to the Article 39, paragraph 1 of the Regulation, consultations shall be implemented during the establishment of a public policy and preparation of draft public policy documents, and their purpose is to collect data from stakeholders and target groups which are necessary for the implementation of an *ex-ante* impact analysis, with a view to defining optimal public policy measures. It is important to differentiate between the terms *consultations* and *public debates*. Namely, consultations were only introduced as a mandatory step in policy making by the adoption of the LPS, and are implemented during the policy making. On the other hand, a public debate is a formal procedure prescribed by the Law on State Administration and the Rules of Procedure of the Government, which refers to the process of including the public in the final stage of creating regulations and public policies, i.e. at the time when the final version of the public policy text is still in the form of a proposal. The primary purpose of a public debate is to inform timely the stakeholders about their rights and obligations which are established by the adoption of the laws or public policy documents, and provide them with an opportunity to make their final observations. In that regard, expected effects of consultations are considerably stronger than expected effects of a debate, and consultations are conducted for the purpose of obtaining key data relevant to the concept of public policy, vision of the reform, and creation of planning elements, such as objectives and measures.

While creating the Programme, the proposer is obliged to continuously conduct consultations with representatives of all target groups and other stakeholders, using the appropriate consultation technique referred to in Article 41, paragraph 2 of the Regulation. In terms of methodology, it is particularly important which methods will be used in consultations with stakeholders, where the choice of method should primarily depend on the missing data which are to be obtained. The most frequently used techniques are:

- Focus groups – as a general rule, organised for groups of 8–12 participants, for the purpose of obtaining specific data relating to a certain problem or option of public policy measures;
- Round tables – organised for a larger number of participants than focus groups, their purpose is obtaining data relevant to the choice of policy options and obtaining general views on the applicability of certain public policy measures;
- Semi-structured interviews – organised individually or for smaller groups of participants, they include questionnaires or lists of questions. The goal of organising this type of interview is to obtain expert opinions on certain problems or policy options, as well as to verify previously established views;
- Panels – Panel discussions entail the participation of experts for the policy area of interest, and their purpose is to obtain a unique view on a certain problem, or identify further problems, causes and consequences;
- Surveys – organised for a large number of participants, their purpose is to obtain data relevant to creating a structured database which describes problems or policy options;
- Collecting written comments – a traditional method of conducting consultations, their purpose is to obtain specific data from a large group of subjects in a non-structured manner. It is useful for establishing problems, objectives and options of public policy measures.

The Regulation further defines the very process of conducting consultations, whereby, depending on the nature, scope and potential effects of the public policy being formulated, the proposer involves representatives of relevant civil society organisations, professional associations and scientific research organisations in the process of consultations, as well as representatives of the public administration, including the relevant state administration bodies. If it is deemed necessary, the proposer may also

involve other relevant subjects in the consultation process, if they are deemed able to provide important information.

The Secretariat may suggest to the Programme proposer to apply a certain method of consultations, if the proposer deems that participants in consultations are not representative enough. An initiative for submitting such a proposal to the Secretariat may be submitted by any stakeholder, and the Secretariat is obliged to ensure the public availability of such initiatives, and information on actions in accordance with them, on its website. In view of this mechanism, it is of particular importance that, while conducting consultations, creators of the Programme shall define the widest possible circle of subjects of such consultations, so the process would not be decelerated in the later stages of creating and adopting the Programme due to the need to hold additional consultations.

1.4.1. Conclusions relating to the consultations during the implementation of the Strategy

In this Report, the incompleteness of the Strategy has been highlighted multiple times as well as that the Action Plan 2015–2016 is mostly a consequence of the absence of a consultation process during the preparation of the Strategy. A significant improvement in quality of the Action Plan 2017–2018 is the result of the consultations having been conducted. Note that the regulatory framework for public policy planning was adopted no earlier than 2018 and 2019, and that, at the time when these documents were adopted, there was no obligation to conduct consultations.

1.4.2. Recommendations relating to the consultations during the Programme preparation

When drafting the Programme, wide-ranging consultations with representatives of the relevant or interested groups should be conducted, using adequate consultation techniques. Considering the identified Programme objectives and the measures planned for the achievement of those objectives, the following consultation techniques would be deemed adequate:

- Surveys/questionnaires, for the purpose of collecting data on the needs and the capabilities of the public administration for the development of e-Government;
- Focus groups with e-Government users, for the purpose of obtaining data on the needs of the users and the problems encountered when using e-Services and implementing procedures;
- Round tables and panel discussions, which would be held by the Coordination Council for e-Government in its full session, for the purpose of identifying specific objectives of the e-Government development and measures for achieving those objectives, adopting a unified position on the need to resolve concrete problems in the development of e-Government, and choosing the optimal option for the resolution of those problems, as well as for the purpose of identifying key activities of the Programme and setting priorities – creating the List of Priority Activities;
- Semi-structured interviews primarily, with the line ministries, for the purpose of obtaining data and opinions on certain problems or policy options;
- Collecting written comments about the Programme at its concept stage, and then publishing them with a view to collecting suggestions from the general public with regard to any additional measures and activities to be included in the Programme.

Pursuant to Article 44, paragraph 1 of the Regulation, the Programme proposer is obliged to inform the participants of consultations about the results of such consultations, and in particular, about the reasons why certain suggestions were not accepted. Information pertaining to the consultations are to be published on the proposer's website no later than 15 days from the end of the consultations.

The course and the results of the consultations are to be explained in detail in the Report on the *ex-ante* impact analysis, as well as in the text of the Programme itself. The focus ought to be on explaining which groups were consulted, which proposals adopted, and which were not, and for what reasons.

2. PLANNING ELEMENTS OF ACTION PLANS AND RECOMMENDATIONS FOR THE IMPROVEMENT OF THE FORM AND THE CONTENTS OF THE ACTION PLAN TO THE PROGRAMME

2.1. Conclusions about the contents of the Action Plans

The Strategy Action Plans deviate from the form prescribed in the LPS. These deviations were expected, given that the legal framework had been adopted after the preparation and the adoption of planning documents. However, they should be avoided in the next planning cycle.

The Action Plan 2017–2018 deviates from the form prescribed in the LPS and the Regulation to a larger extent. The key issue is the discontinuity with the Strategy, which lies in the fact that the Action Plan did not include the overall and the specific objectives of the Strategy. As noted elsewhere in the Report, the Action Plan was prepared not through an operationalisation of a strategic document, but independently of it. Measures were grouped around themes which do not correspond to the Strategy directly. Thus, certain overall and specific objectives from the Strategy ended up not having their operational elaboration in the Action Plan 2017–2018. This raises the question, to what extent this Action Plan has contributed to the achievement of the objectives proclaimed in the Strategy.

Other inconsistencies in the planning have also been observed. This Action Plan merely lists individual measures, without mentioning their principal implementers, deadlines for implementation, costs of implementation and sources of funding, or respective performance indicators, which makes it more difficult to monitor the execution of the Action Plan. Also, no link has been established between individual measures and activities. Instead, the activities were linked exclusively to groups of measures. These inconsistencies were partially a consequence of methodological oversights during the preparation of the Strategy and the first Action Plan.

2.2. Recommendations on the improvement of the form and the contents of the Action Plan to accompany the Programme

The next Action Plan to the Programme must not have the shortcomings of the previous two Action Plans, and it is to ensure a consistent application of the LPS and the Regulation. This means, above all, that the Action Plan should reflect the logical operationalisation of the Programme, and ensure full continuity of the Programme. The form and the contents of the Action Plan are prescribed in Article 58 of the Regulation, but the Secretariat will provide the actual Action Plan template to public policy proposers. When compiling the Action Plan for the implementation of the Programme, the provided template needs to be completed, as it will be used as a tool for entering planning elements into the Unified Information System for public policy documents which is maintained by the Secretariat.

All individual planning elements of the next Action Plan are presented in the tables below.

Table 1: Overall objectives

OVERALL OBJECTIVE 1	Title
INSTITUTION RESPONSIBLE FOR MONITORING AND IMPLEMENTATION	

Indicator(s) at the level of specific objective (performance indicator)	Unit of measurement	Source of verification	Baseline value	Baseline year	Target value in the final year of the Action Plan	Target value in the final year the Action Plan validity

Table 2: Specific objectives

SPECIFIC OBJECTIVE 1	Title						
INSTITUTION RESPONSIBLE FOR MONITORING AND IMPLEMENTATION							
Indicator(s) at the level of specific objective (performance indicator)	Unit of measurement	Source of verification	Baseline value	Baseline year	Target value in the current year + 1 year	Target value in the current year + 2 years	Target value in the final year of the Action Plan

Table 3: Measures

MEASURE	1.1.					
Institution responsible for monitoring and implementation						
Implementation period			Measure type			
Performance indicator 1	Unit of measurement		Source of verification			
	Baseline year	Baseline value	Target value in the current year + 1 year	Target value in the current year + 2 years	Target value in the final year of the Action Plan	

Table 4: Source of funding of the measures

Source of funding of the measure	Programme/project budget line or reference number	Total estimated amount of funds expressed in (0.00) RSD		
State Budget	Enter the budget code/line number	In the current year + 1 year	In the current year + 2 years	In the current year + 3 years
EU-funding				

Table 4: Activities

		Implementati on partners	Implementati on deadline	Performan ce			Total estimated amount of funds expressed in (0.00) RSD
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NAME OF ACTIVITY	Leading implementing authority			indicators and Target value	Source of funding	Budget line/reference number	2019	2020	2021
1.1.1				Number of training participants : 45 Number of training courses conducted: 5					
1.1.2									

3. STRATEGY MEASURES TO BE INCORPORATED INTO THE PROGRAMME

In this segment of the recommendations, it is suggested that certain measures from the Strategy and the Action Plans, which have been identified as crucial for establishing an efficient e-Government in Serbia, be incorporated into the Programme, if it has been ascertained:

- that key activities within such measures have not been fully implemented; and/or
- that expected effects have not been achieved.

3.1. List of measures to be incorporated into the Programme

3.1.1. Establishing the second Data Centre in Serbia

At the moment, there is only one Data Centre – the one in Belgrade – which satisfies the needs for storage of the existing data from birth, death or marriage registers. However, its capacities are insufficient for a further development of electronic business in public administration bodies. Thus, the capacities need to be expanded by building a new Data Centre. Initial steps were taken in the previous cycle.

3.1.2. Establishing electronic office operations

Office operations in the public authorities of Serbia are currently governed by two separate regulations, and need to be regulated in a unified manner, through a unified regulation, by prescribing the priority of office operations over the traditional model of analogue operations. When planning this measure, efforts should be made to ensure fully electronic office operations in the implementation of administrative proceedings, from receiving a case file, to registering the case file in the e-Registry Office and reviewing the case, to delivering the acts to the party in the proceedings and conducting second-instance administrative and judicial proceedings.

3.1.3. Regular training in e-Services for civil servants and citizens

If e-Government is to be fully operational in the following years, it is necessary to continue the training programmes for the personnel in the public administration teaching them a) how to work in an electronic environment, and b) about electronic communication, both with other public authorities and with citizens and businesses. Such programmes should also be provided to citizens and anyone else who needs them, whether through charts, video tutorials, or actual training.

3.1.4. Ensuring a coordinated use of IT resources by assigning a single body to work on creating, maintaining and managing the state cloud, as well as provide continuous training for employees

This measure mostly concerns the development and management of personnel who would be involved in maintaining and upgrading the IT system in the public administration. The method of

implementation of this measure (by a special authority or by outsourcing) entails a detailed analysis of available options. Such an analysis stems from the complexity of the problems to be solved, primarily the problem of the lack of IT personnel in the public administration, as well as the need to establish interoperability in the public administration.

3.1.5. Improving the legal framework on e-Commerce in public administration bodies

It entails the adoption of regulations which were not adopted in the previous cycle, but which have been planned.

3.1.6. Establishing and popularising a unified way of identifying e-Government users, which will replace the identification/signature of the party in most procedures

Define minimum levels of authentication from the central level, in order to avoid having various local self-governments prescribing different levels of authentication for the same service. At the moment, electronic procedures implemented by the public administration entail a high level of authentication, which is not optimal in terms of the delivery of services, as lower levels suffice for certain procedures.

3.1.7. Abolishing the obligation of the parties to provide a proof of payment

It is necessary to prohibit public administration bodies from demanding a proof of payment of a fee for services provided. This prohibition may be prescribed in an amendment to the Budget System Law, the Law on Republic Administrative Fees or the Law on Electronic Government. In practice, payments would be verified in one of the following ways: either through electronic procedures, with online electronic payment as a separate step in the submission of an application, or by public administration bodies providing reference numbers to parties for making payments, which would make it possible to simply verify a payment/match a payment with the respective payer and case (file).

3.1.8. Enabling electronic archiving and long-term preservation of business records (a group of measures)

Amendments to regulations will enable the preservation and the archiving of all documents electronically, whether or not they originated in the paper form, unless the paper originals are of cultural or historical significance.

3.1.9. Opening data generated in the course of public administration operations (a group of measures)

This measure should be incorporated into the e-Government Development Programme, in such a manner that the portal itself may continue to be improved, and that it may be integrated with the “Smart Cities”. Data published on the Portal should be improved through an increase of the number and the types of datasets and their regular updating with fresh data, so that the idea of open data would not lose its meaning.

3.1.10. Establishing a special body for the coordination of e-Government at the level of local self-governments

This body needed to be created for a better coordination of e-Government reform activities. The implementation indicator from the Action Plan 2015–2016 was based on the desire to set up a 12-member coordinating body, without clarifying if the members should be representatives of 12 different LSGUs or if the body should comprise of representatives of ministries. In addition, a question arises about the extent to which the coordinating body should include non-public entities, such as civil society organisations.

3.1.11. Establishing and publishing a national register of trusted service providers – Trusted List (certification bodies, issuers of time stamps, CRL and OCSP providers...)

This measure has been planned for the purpose of alignment with the TSL Directive and the assumption that the national framework will be harmonised in such a manner that a unified register will cover all service providers and their services.

3.1.12. Completing the legal framework on e-Government within the purview of the Ministry of Finance

The Action Plan 2015–2018 programmes the completion of the legal framework of 8 different ministries, the Ministry of Finance being the only which reported that it has not conducted any activities for the completion of the legal framework in the field of e-Government. An analysis conducted by NALED suggests that there are two regulations within the purview of the Ministry which require amendments in the forthcoming period: the Law on Republic Administrative Fees and the Budget System Law. It has been decided, for both of these statutes, that amendments are important in terms of enabling efficient payments within the e-Government. It is necessary to determine whether other regulations (laws or by-laws) need to be amended or adopted to improve e-Government. In line with a NALED research which has been conducted for the purposes of the Programme drafting, the Ministry has stated that adoption of by-laws is envisaged in accordance with the Law on Records and Data Processing in the field of Internal Affairs and the Rulebook on the Unique Master Citizen Number. These should be included in the final list of regulations to be adopted, in order to complete the legal framework of the Ministry of Finance.

3.1.13. “e-Literacy for a Million Citizens” for using e-Services on the e-Government Portal – training in the national e-Government Portal for citizens

The activity involves training e-Service users, i.e. citizens, to use such services, and for an efficient use of the national e-Government Portal. The measure is educational and informative, and aimed at raising citizens’ skills. Capacities are assumed to be raised for the group of citizens who are interested in using e-Services. This measure may be implemented in different ways, including online training on the portals of e-Services providers, as well as through information campaigns.

3.1.14. Establishing a central electronic system for collection of data from citizens on the quality of the e-Government services provided

This is one of the key measures from the Action Plan 2015–2016 which has not been implemented, and which should provide data on the quality of e-Services offered to citizens. It is particularly important to collect such data in order to measure efficiently the progress of public administration in providing public services of high quality. The portal www.dobrauprava.rs provides the option to complete a questionnaire which, *inter alia*, contains a question about the quality of e-Services (rating: excellent, good, neutral, poor, very poor). However, data on the results of such questionnaires are not available. This measure should be reviewed and improved to reflect the need for an upgraded portal with simpler and more user-friendly questionnaires about the quality of e-Services.

3.1.15. Raising awareness about the importance of open data and encouraging the use of open data

In the context of open government, promoting the use of data for research and other purposes is important for familiarising all stakeholders with the option of using publicly available datasets. Otherwise, open data on the open government portal would not be very relevant. Thus, various

informational and educational measures could be taken for the purpose of raising awareness about the importance of open data and encouraging the use of open data: from media promotions and training for employees of the public administration, to including open data as a subject in the general educational programmes and state examination preparation programmes.

4. OBLIGATION TO CONDUCT AN IMPACT ANALYSIS OF PUBLIC POLICY MEASURES

4.1. Conclusions about the scope of implementation of the impact analysis of public policy measures as prescribed in the LPS

Pursuant to Article 31 of the LPS, public policy documents will be prepared in line with the results of their *ex-ante* impact analysis and *ex-post* impact assessment of applicable public policy documents and regulations thereof. This Report largely contributes to the above requirement, and serves as an analytical basis for the implementation of an *ex-ante* impact analysis. The decision on the implementation of an *ex-ante* impact analysis of public policy documents will be adopted by the proposer on the basis of results of the test of the impact level and priority level, which will be conducted in accordance with Appendix 3 of the Regulation.

In view of the fact that an impact analysis is not conducted only for public policies of low impact and low priority, as well as the fact that the Strategy provides for measures of high political priority and significant political, fiscal or legal consequences, it has been established that an impact analysis should be conducted during the preparation of the Strategy, the same as for the Programme, which continues the planning of the development of e-Government.

In terms of the scope of an impact analysis, Article 8 of the Regulation presents details about cases in which a detailed impact analysis needs to be conducted. The basic criterion is determining whether a specific public policy measure would significantly impact natural persons, including vulnerable groups of the population, and/or legal persons, and/or the budget of the Republic of Serbia, and/or the environment and/or public authorities, i.e. whether it would:

- impact over 200,000 citizens;
- impact the market conditions and the competition;
- impact over 5% of entrepreneurs or legal persons of a certain category according to criteria established in the law regulating accounting, or over 20% of such persons conducting a certain activity, if such public policy measures dominantly affect business activity in that field;
- impact the implementation of public investments, particularly capital projects in accordance with the regulations governing the contents, method of preparation and assessment, as well as monitoring of implementation and reporting on the execution of capital projects.

4.2. Recommendations relating to the scope of impact analysis which is to be implemented during the drafting of the Programme

Given how important the Programme would be as the leading e-Government public policy document, an *ex-ante* analysis would need to be conducted as the Programme is being drafted, in accordance with the LPS and the Regulation. It would only be reasonable to conduct a detailed *ex-ante* impact analysis of measures which could have significant effects; they are listed in Article 8, paragraph 4 of the Regulation. Even then, a detailed analysis would not be necessary in case of measures which the Government had already decided need to be implemented, i.e. measures which are implemented as prescribed in the LPS or stipulated in an international treaty. The assumption is that a detailed impact

analysis of such measures would have been conducted before the adoption of the Government's decision or the law, or the signing/ratification of the treaty, which ever applies. If it is obvious that such a measure would cause a problem, an alternative to achieving the desired effect may be considered.

4.3. Recommendations with regard to the Report on the *ex-ante* public policy impact analysis

A summary of the *ex-ante* impact analysis should be presented in the text of the Programme itself, listing the most important findings. The Programme should be accompanied by a full report on the *ex-ante* impact analysis, in the form(at) and with the contents and the elements as per Articles 36 and 37 of the Regulation. The report will not be mandatory in exceptional cases, i.e. when the full contents of the *ex-ante* impact analysis have already been incorporated into the text of the Programme.

**Appendix 1 to the Report on the Detailed Impact Assessment of the e-Government Development Strategy in the Republic of Serbia
2015–2018**

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2015–2016						
<i>Specific objective</i>	<i>No.</i>	<i>Activity</i>	<i>Lead implementing authority</i>	<i>Partners</i>	<i>Performance indicator</i>	<i>Implementation status</i>
1	1.1	Alignment of the programme budget of the Directorate for e-Government 2016–2018, with the Strategy for the Development of e-Government in the Republic of Serbia 2015–2013, and the Action Plan for the implementation of the Strategy for the Development of e-Government in the Republic of Serbia 2015–2016.	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, Ministry of Trade, Tourism and Telecommunications, Ministry of Interior, Tax Administration, Republic Geodetic Authority, Treasury Administration, Ministry of Justice, Administration for Joint Services for the Republic Bodies, Ministry of Defence, Ministry of Finance, State Audit Institution and other state bodies, bodies of the autonomous province and local self-government units actively involved in the preparation and the implementation of the Strategy	Strategy for the Development of e-Government in the Republic of Serbia 2015–2013, and the Strategy for the Development of e-Government in the Republic of Serbia 2015–2016 Baseline value (BV): “not adopted” Target value (TV): “adopted”	implemented

1	1.2	Establishing the Working Group for e-Government and forming subgroups for infrastructure, electronic services and laws, which will follow the implementation of the Strategy and the Action Plan	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, Ministry of Trade, Tourism and Telecommunications, General Secretariat of the Government	Number of meetings of the Working Group for e-Government with subgroups BV: 0 TV: 4 Number of meetings of subgroups of the Working Group for e-Government BV: 0 TV: 20	partially implemented
1	1.3	Establishing a special body for the coordination of e-Government at the level of local self-governments	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, Standing Conference of Towns and Municipalities, all bodies of the autonomous province and local self-government units	Number of members of the special body for the coordination of e-Government at the level of local self-governments BV: 0 TV: 12	not implemented
1	1.4	Law on Electronic Government of the Republic of Serbia	Ministry of Public Administration and Local Self-Government	Directorate for e-Government	Law on Electronic Government has been adopted BV: "not adopted" TV "adopted"	implemented

1	1.5	Rulebook on using the ICT infrastructure of the e-Government	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Administration for Joint Services for the Republic Bodies, Ministry of Trade, Tourism and Telecommunications, all state bodies, bodies of the autonomous province and local self-government units	Number of bodies using ICT infrastructure of e-Government in accordance with the Rulebook BV: 0 TV: 10	implemented
1	1.6	Completion of the e-Government legal framework within the purview of the Ministry of Public Administration and Local Self-Government	Ministry of Public Administration and Local Self-Government	Tax Administration, Republic Geodetic Authority, Treasury Administration, Ministry of Justice, Administration for Joint Services for the Republic Bodies, Republic Secretariat for Legislation, Ministry of Trade, Tourism and Telecommunications, Ministry of Finance, Ministry of Economy, Commissioner for Free Access to Information of Public Importance and Personal Data Protection, Directorate for e-Government	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: “not adopted” TV: “over 70% of laws and by-laws aligned”	partially implemented

1	1.7	Completion of the e-Government legal framework within the purview of the Ministry of Trade, Tourism and Communications	Ministry of Trade, Tourism and Communications	Treasury Administration, Directorate for e-Government, Ministry of Justice, Administration for Joint Services for the Republic Bodies, Republic Secretariat for Legislation, Ministry of Public Administration and Local Self-Government, Ministry of Finance, Ministry of Economy, Ministry of Defence, Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 70% of laws and by-laws aligned”	partially implemented
1	1.8	Completion of the e-Government legal framework within the purview of the Ministry of Culture and Information	Ministry of Culture and Information	All state bodies, bodies of the autonomous province and local self-government units, Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 80% of laws and by-laws aligned”	partially implemented
1	1.9	Completion of the e-Government legal framework within the purview of the Ministry of Justice	Ministry of Justice	All state bodies, bodies of the autonomous province and local self-government units, Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 70% of laws and by-laws aligned”	partially implemented

1	1.10	Preparation of an analysis and Draft Law on Records for the implementation of e-Government within the purview of the Ministry of Interior	Ministry of Interior	Republic Secretariat for Legislation, Administration for Joint Services for the Republic Bodies, Directorate for e-Government, Republic Geodetic Authority, Ministry of Finance, Ministry of Public Administration and Local Self-Government, Commissioner for Free Access to Information of Public Importance and Personal Data Protection and other state bodies	Draft Law on Records has been finalised BV: 0 TV: “adopted”	implemented
1	1.11	Completion of the e-Government legal framework within the purview of the Ministry of Economy	Ministry of Economy	Tax Administration, Directorate for e-Government, Republic Geodetic Authority, Treasury Administration, Ministry of Justice, Administration for Joint Services for the Republic Bodies, Republic Secretariat for Legislation, Ministry of Trade, Tourism and Telecommunications, Ministry of Finance, Ministry of Public Administration and Local Self-Government, Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 70% of laws and by-laws aligned”	partially implemented

1	1.12	Completion of the e-Government legal framework within the purview of the Ministry of Construction, Transport and Infrastructure	Ministry of Construction, Transport and Infrastructure	Republic Geodetic Authority, all state bodies, bodies of the autonomous province and local self-government units	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 70% of laws and by-laws aligned”	implemented
1	1.13	Completion of the e-Government legal framework within the purview of the Ministry of Finance	Ministry of Finance	Tax Administration, Directorate for e-Government, Republic Geodetic Authority, Treasury Administration, Ministry of Justice, Administration for Joint Services for the Republic Bodies, Republic Secretariat for Legislation, Ministry of Trade, Tourism and Telecommunications, Ministry of Public Administration and Local Self-Government, Ministry of Economy, Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Analysis of required amendments to the existing laws, by-laws and internal rulebooks and adoption of new ones BV: 0 TV: “over 80% of laws and by-laws aligned”	not implemented
2	2.1	Establishing a judicial information system in the field of international legal assistance	Ministry of Justice	Public Prosecutor’s Office of the Republic of Serbia	Establishing a judicial information system in the field of international legal assistance: BV: 50% * TV: 100%	implemented

2	2.2	Application of interoperability standards and protocols (contained in the Action Plan for Implementation of the Public Administration Reform)	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, Ministry of Interior, Ministry of Trade, Tourism and Telecommunications, Business Registers Agency, Republic Geodetic Authority, Tax Administration, National Bank of Serbia, Treasury Administration, Administration for Joint Services for the Republic Bodies, Ministry of Finance, civil society organisations,	Number of state authorities, bodies of the autonomous province and local self-government units which apply interoperability standards BV: 4 TV: 50	implemented
2	2.3	Connecting state administration bodies, bodies of the autonomous province and local self-government units on the service main (contained in the Action Plan for Implementation of the Public Administration Reform)	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, Administration for Joint Services for the Republic Bodies, Ministry of Interior, Business Registers Agency, Republic Geodetic Authority, Tax Administration, National Bank of Serbia, Treasury Administration, Administration for Joint Services for the Republic Bodies, Ministry of Defence	Number of state administration bodies, bodies of the autonomous province and local self-government units which use the service main in accordance with the Directive on the re-use of public sector information BV: 4 TV: 20	implemented

2	2.4	Consolidation of the state communication network	Ministry of Trade, Tourism and Communications	Administration for Joint Services for the Republic Bodies, all state bodies, bodies of the autonomous province and local self-government units	Number of state bodies connected to the main network of state bodies at the national level BV: 70 TV: 150	partially implemented
2	2.5	Improvement of the ICT infrastructure of judicial bodies	Ministry of Justice	High Court Council	Equipment necessary for the replacement of outdated workstations, servers and network operators in courts and prosecutor's offices has been purchased BV: 0% TV: 50%	implemented
2	2.6	Collaboration services of state bodies	Directorate for e-Government	Administration for Joint Services for the Republic Bodies, Ministry of Culture, Ministry of Education, Science and Technological Development, Ministry of Public Administration and Local Self-Government, Republic Directorate for the Property of the Republic of Serbia,	Number of services implemented through the catalogue of the service of the Administration for Joint Services of the Republic Bodies BV: 0 TV: 10	implemented

3	3.1	Completion of the electronic register of primary, secondary and tertiary health-care institutions	Ministry of Health	National Health Insurance Fund, Directorate for e-Government	Number of primary, secondary and tertiary health-care institutions which are included in the electronic register BV: 0 TV: 200	implemented
3	3.2	Establishing the Register of all ICT resources of state bodies	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, all state bodies, bodies of the autonomous province and local self-government units	Percentage of state authorities, bodies of the autonomous province and local self-government units, resources of which are entered in the Register BV: 0% TV: 70%	implemented
3	3.3	Establishing and publishing a national register of trusted service providers – the <i>Trusted List</i> (certification bodies, time stamp issuers, CRL and OCSP providers...)	Ministry of Trade, Tourism and Communications	Directorate for e-Government	The online list has been published in accordance with the recommendation ETSI TS 119 612 B1.2.1 (2014-04) “ <i>Trusted Lists</i> ” BV: “unpublished” TV: “published”	not implemented
3	3.4	Establishing an information system of the central electronic register of spatial and urban plans	Republic Geodetic Authority	Ministry of Construction, Transport and Infrastructure, bodies of the autonomous province and local self-government units	Establishing an electronic register of spatial and urban plans BV: “not adopted” TV: “established”	implemented
3	3.5	Establishing an electronic Register of Holders of Public Authority - stage 1	Ministry of Public Administration and Local Self-Government	Directorate for e-Government, State Audit Institution, Human Resource Management Service, Ministry of Finance	Number of bodies included in the electronic Register of Holders of Public Authority BV: 0 TV: 200	not implemented

3	3.6	Establishing an electronic population register (stage 1)	Ministry of Public Administration and Local Self-Government	Ministry of Interior, Directorate for e-Government, Statistical Office of the Republic of Serbia	Number of state administration bodies, bodies of the autonomous province and local self-government units which conducting electronic queries in the population register BV: 0 TV: 40	not implemented
3	3.7	Improvement of the Register of Business Entities and other status registers of the Business Registers Agency - Data quality has been improved by linking them to other available registers; - Volume and content of data in registers has been improved on the basis of adopted laws; - Availability of data in registers and data service delivery has been improved.	Business Registers Agency	Directorate for e-Government, Statistical Office of the Republic of Serbia, Ministry of Economy, Ministry of Interior, Republic Geodetic Authority	Number of state administration bodies, bodies of the autonomous province and local self-government units which conduct automatised queries in the register of business entities BV: 10 TV: 20	implemented
3	3.8	Application of the terms and conditions of use for e-Government services on the national e-Government Portal	Directorate for e-Government	All state bodies, bodies of the autonomous province and local self-government units, civil society organisations,	Number of state administration bodies, bodies of the autonomous province and local self-government units which apply the e-Government Portal Terms and Conditions of Use BV: 100 TV: 160	implemented

3	3.9	Catalogue of web services available on the central main of state administration bodies (Government Service Bus)	Directorate for e-Government	All state bodies, bodies of the autonomous province and local self-government units, civil society organisations	Number of state administration bodies, bodies of the autonomous province and local self-government units which use web services from the Catalogue BV: 4 TV: 20	implemented
3	3.10	Improvement of the Portal of Courts displaying information about the course/progress of the case with data from misdemeanour courts, appellate courts, the Supreme Court of Cassation and the Administrative Court	Ministry of Justice	High Court Council	Improvement of the Portal of Courts displaying information about the course/progress of the case with data from misdemeanour courts, appellate courts, the Supreme Court of Cassation and the Administrative Court: BV: "not improved" TV: "improved"	implemented
3	3.11	Establishing an electronic register of teachers in elementary and secondary schools and tertiary education establishments, an electronic register of researchers and an electronic register of school and university students in the sector of education and science	Ministry of Education, Science and Technological Development	Educational institutions, Ministry of Public Administration and Local Self-Government, Directorate for e-Government	Registers established: BV: "not adopted" TV: "established"	implemented
3	3.12	Establishing a central data base on foreign nationals	Ministry of Interior	Ministry of Finance, Ministry of Foreign Affairs	Central Register of Foreign Nationals has been established BV: "not established" TV: "established"	implemented

4	4.1	Electronic services relating to the issuance of cadastral documents by the RGA	Ministry of Trade, Tourism and Communications	Republic Geodetic Authority, Ministry of Public Administration and Local Self-Government, Directorate for e-Government, Ministry of Construction, Transport and Infrastructure	Number of implemented applicative solution for the issuance of cadastral documents by the RGA BV: 0 TV: 5 pilot towns and municipalities	implemented
4	4.2	Services relating to the access to wealth tax liabilities	Ministry of Trade, Tourism and Communications	National Health Insurance Fund, Institute of Public Health of Serbia, Directorate for e-Government	Services relating to the access to wealth tax liabilities BV: "not implemented" TV: "implemented"	partially implemented
4	4.3	Implementation of hospital information systems in hospitals	Ministry of Health	Ministry of Interior, Ministry of Public Administration and Local Self-Government	Number of hospitals with a hospital information system BV: 0 TV: 19 hospitals	implemented
4	4.4	Improvement of the electronic service – online submission of applications for residence registration on the e-Government Portal	Directorate for e-Government	Ministry of Interior, Ministry of Public Administration and Local Self-Government Directorate for e-Government,	Number of police administrations in which the electronic service is enabled BV: 1 TV: 27	partially implemented

4	4.5	Establishing electronic services relating to the issuance of personal documents	Ministry of Trade, Tourism and Communications	Ministry of Interior, Ministry of Public Administration and Local Self-Government - Directorate for e-Government	Percentage of electronic applications for the service of the total number of submitted applications BV: 0% TV: 5% of all applications	partially implemented
4	4.6	Implementation of electronic services relating to the process of driving instructing (additional functionalities on the e-Government Portal)	Ministry of Trade, Tourism and Communications	Ministry of Interior, Road Traffic Safety Agency, Directorate for e-Government	Service relating to the process of instructing driver candidates has been introduced BV: "service is not available on the e-Government Portal" TV: "service provided on the e-Government Portal" Number of driving schools with driving instruction certificates BV: 0 TV: 100	implemented
4	4.7	Linking repositories of doctoral dissertations on the e-Government Portal	Ministry of Education, Science and Technological Development	Academic institutions, Directorate for e-Government	Repositories of doctoral dissertations on the e-Government Portal BV: 0 TV: TBD	implemented

4	4.8	“e-Literacy for a Million Citizens” for using e-services on the e-Government Portal – training courses for citizens for using the national e-Government Portal	Directorate for e-Government	Educational system of Serbia (universities, secondary schools, elementary schools), Ministry of Trade, Tourism and Telecommunications, Civil society organisations	Number of implemented training courses for citizens for using e-Government services. BV: 0 TV: 50	not implemented
4	4.9	Improvement of the service main at all levels of communication G2G, G2B and G2C	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Ministry of Economy, Ministry of Trade, Tourism and Communications	Number of bodies using the service main BV: 5 TV: 20	implemented
4	4.10	Analysis of business processes of republic-level inspection services of the Republic of Serbia	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Tax Administration, Ministry of Labour, Employment, Veteran and Social Policy, Ministry of Trade, Tourism and Telecommunications, Ministry of Agriculture and Environmental Protection, Ministry of Health, Ministry of Education, Science and Technological Development, Republic Geodetic Authority	Number of inspection services of which business processes have been listed BV: 2 TV: 30	implemented

4	4.11	Establishing a unified information system (e-Inspector) – Stage 1	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Tax Administration, Ministry of Labour, Employment, Veteran and Social Policy, Ministry of Trade, Tourism and Communications	Number of inspection services using the information system BV: 0 TV: 4	partially implemented
4	4.12	Establishing repositories of videos designed to teach civil servants to administer, generate and process applications on the e-Government Portal	Directorate for e-Government	All state bodies, bodies of the autonomous province and local self-government units which provide e-Services for citizens, economic entities and public administration employees	Percentage of civil servants in charge of administering, generating and processing of services on the e-Government Portal following training by video tutorial BV: 0% TV: 60%	partially implemented
4	4.13	Improvement of the IT structure: Action Plan for the Implementation of the Government Programme; PIRV, existing system for programme budgeting and budget execution, as well as the ISDACON and NPAA systems	Secretariat for Public Policies of the Republic of Serbia	General Secretariat of the Government, Ministry of Finance, all state administration bodies	Extent to which reports provide information about achieved results BV: 3 TV: 4	partially implemented

4	4.14	First stage of the establishment of a functional internal audit	Ministry of Finance	State Audit Institution, all state bodies, bodies of the autonomous province and local self-government units, Tax Administration	Implemented applicative solutions for the purposes of internal audit BV: 0 TV: 59 beneficiaries of public funds	implemented
4	4.15	Development and implementation of an electronic operations system	Ministry of Trade, Tourism and Communications	Directorate for e-Government, Ministry of Economy, Ministry of Finance	Percentage of small and medium enterprises in Serbia which use electronic invoices in their activity BV: 0% TV: 20%	implemented
4	4.16	Establishing a central electronic system for collection of data from citizens on the quality of provided e-Government services	Directorate for e-Government	Ministry of Public Administration and Local Self-Government	Number of services which have been subjects of the quality assessment BV: 0 TV: 20	not implemented

4	4.17	Impact analysis in case of the introduction of QMS (Queue Management System) and recommendations for the prioritisation of new electronic services of state administration bodies	Ministry of Public Administration and Local Self-Government	Directorate for e-Government	Number of state administration bodies and local self-governments which are subjects of the analysis BV: 0 TV: 20	not implemented
4	4.18	Introduction of a system of debit/credit card payments for e-services on the national portal	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Ministry of Interior, Ministry of Finance, Treasury Administration	Number of processed (debit/credit) card payments for the national portal e-services in 2016 BV: 0 TV: 10,000	partially implemented
5	5.1	Training employees for generating (creating) e-services on the national e-Government Portal and processing submitted electronic applications through the e-Government Portal	Directorate for e-Government	Human Resource Management Service, all state bodies, bodies of the autonomous province and local self-government units, Ministry of Public Administration and Local Self-Government	Number of employees in state bodies who are trained to generate (create) electronic services on the national e-Government Portal and processing applications submitted through the e-Government Portal BV: 500 TV: 1000	partially implemented
5	5.2	E-Learning platform for employees in state administration bodies, bodies of the autonomous province and local self-government units	Ministry of Public Administration and Local Self-Government	Human Resource Management Service, Directorate for e-Government, Ministry of Education, Science and Technological Development	Number of employees in state bodies who use the e-Learning platform BV: 0% TV: 30% Number of modules within the e-Learning platform BV: 0 TV: 20	partially implemented

5	5.3	Perfecting project management skills	Directorate for e-Government	Human Resource Management Service, Academic institutions, all state bodies, bodies of the autonomous province and local self-government units	Number of organised workshops/–training sessions for perfecting project management skills BV: 0 TV: 10	not implemented
5	5.4	Introduction of the unified system of identity smart cards with electronic certificates for civil servants (Pilot)	Directorate for e-Government	Ministry of Interior, Ministry of Public Administration and Local Self-Government, Ministry of Culture, Ministry of Trade, Tourism and Communications	Number of bodies working on the information system of identity smart cards with electronic certificates for civil servants BV: 1 TV: 4	not implemented
5	5.5	Cost benefit analysis of the widespread use of Cloud platforms in the state administration system	Directorate for e-Government	Ministry of Public Administration and Local Self-Government, Ministry of Education, Ministry of Culture, Ministry of Trade, Tourism and Telecommunications, Administration for Joint Services for the Republic Bodies	Number of state bodies which participated in the compilation of the study and created services at the unified Cloud platform of the Government BV: 0 TV: 5	partially implemented
6	6.1	Open Data Readiness Assessment	Directorate for e-Government	State administration bodies, Commissioner for Free Access to Information of Public Importance and Personal Data Protection, academic institutions, civil society organisations	Number of state administration bodies for which an Open Data Readiness Assessment has been conducted BV: 0 TV: 20	implemented

6	6.2	Creating a working group for the implementation of recommendations from the Open Data Readiness Assessment	Directorate for e-Government	State administration bodies, Statistical Office of the Republic of Serbia, Serbian Chamber of Commerce, Commissioner for Free Access to Information of Public Importance and Personal Data Protection, civil society organisations	Number of state administration bodies which have delegated representatives into the Working Group for the implementation of recommendations from the Open Data Readiness Assessment BV: 0 TV: 12	implemented
6	6.3	Alignment of the legislative framework with recommendations from the Open Data Readiness Assessment	Ministry of Public Administration and Local Self-Government	Working Group for the implementation of recommendations from the Open Data Readiness Assessment and Commissioner for Free Access to Information of Public Importance and Personal Data Protection	Prepared and adopted amendments of laws and by-laws regulating open data and alignment of the directive on the re-use of data BV: 0 TV: Alignment of the Directive and open data are regulated by laws and by-laws	partially implemented
6	6.4	Alignment of the institutional framework with recommendations from the Open Data Readiness Assessment	Directorate for e-Government	Working group for the implementation of recommendations from the Open Data Readiness Assessment	Institutional principal body for the coordination of the use of information technologies in all public administration bodies, with a capacity for open data programme management BV: "not implemented" TV: "implemented"	not implemented

6	6.5	Raising awareness about the importance of open data and encouraging the use of open data	Directorate for e-Government	Working group for the implementation of recommendations from the Open Data Readiness Assessment media, UNDP, World Bank	Number of citizens, economic entities, media, institutions and civil society organisations covered by the open data campaign BV: 0 TV: 500,000 Number of held workshops for economic entities, civil society, academic institutions and media BV: 0 TV: 15	partially implemented
6	6.6	Implementation of pilot projects for open data in state administration	Directorate for e-Government	5 state authorities chosen on the basis of the Open Data Readiness Assessment	Pilot projects implemented BV: 0 TV: 5	partially implemented
6	6.7	Monitoring the fulfilment of accessibility standards of websites of state administration bodies in accordance with the criteria contained in the Guidelines for the creation of websites of state administration bodies, bodies of the autonomous province and local self-government units	Directorate for e-Government	Team for social inclusion and poverty reduction and all state authorities, bodies of the autonomous province and local self-government units	Percentage of websites with e-Accessible information and services in accordance with the UN Convention on the Rights of Persons with Disabilities, and the W3C standard BV: 42% TV: 90%	not implemented

Appendix 2 to the Report on the Detailed Impact Assessment of the e-Government Development Strategy in the Republic of Serbia 2015–2018

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
1	1	Collection and systematisation of data which will be contained in the Metaregister	MPALSG	Completed	Yes	No external sources of verification other than the Action Plan.
1	2	Adoption of the Draft Law on the Metaregister (which will regulate what the Metaregister is, what public registers are, and who is competent for establishing and maintaining specific registers)	MPALSG	It will not be a law but a regulation, adopted in early October.	Yes	The Government adopted the Regulation on the method of maintaining the Metaregister, method of suspending and abolishing the access to the Service Main of the bodies and the method of work at the e-Government Portal (<i>The Official Gazette of the Republic of Serbia</i> , No. 104, 28 December 2018).
1	3	Establishing a codebook for identification to be used for linking data on natural and legal persons in different registers, stage 1	ITE Office	Incorporation of all codebooks and establishment of a new codebook of competences has been agreed with the RGA	No	
1	4	Establishing the Metaregister (development of a software solution for the Metaregister) - stage 1	ITE Office	Not to be started until the adoption of the Regulation.	No	No software solution for the Metaregister has been prepared. Recommendation: this activity should be incorporated into the next Programme.
1	5	Determination of the coverage of the data in the Central Population Register (births, marriages, divorces, deaths, Serbian nationals, foreign nationals residing in Serbia, etc.)	MPALSG	Adopted by the Working Group	Yes	Article 10 of the Law on the Central Population Register (<i>The Official Gazette of the Republic of Serbia</i> , No. 17/2019) contains a description of all records to be incorporated into the Central Population Register.
1	6	Draft statute which will regulate the establishment and the maintenance of the population register has been adopted	MPALSG	Tomorrow - the last meeting of the Working Group, September - opinions, adopted by the end of the year	Yes	On 14 March 2018, the National Assembly adopted the Law on the Central Population Register (<i>The Official Gazette of the Republic of Serbia</i> , No. 17/2019).

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
1	7	Establishing the Central Population Register (development of a software solution, data migration)	ITE Office	Functional specification is being prepared, tender procedure will be held after the adoption of the Law on Registers are linked to the citizenship at the local level, while other data will be migrated after the establishment of the Register, in the first half of 2019.	Partially	At the time when the analysis was conducted, the software solution had not been established.
1	8	Pilot project for the improvement of the Address Register in the area of the City of Loznica	RGA	Completed	Yes	
1	9	Amending the Regulation on Address Register	RGA	adopted	Yes	
1	10	Development of a software solution to be used for the improvement of the Address Register	RGA	Completed	Yes	Source of verification: AP
1	11	Adoption of the Law on the Register of Spatial Units and the Address Register	RGA	Working Group is being formed.	No	The Law on the Register of Spatial Units and the Address Register is to be adopted after the adoption of the Regulation on the Address Register. The Regulation was adopted in June 2017.
1	12	Establishing the Register of Local Tax Administrations	ITE Office	On-going migration of all LTAs into the central system located in the Data Centre managed by the ITE Office.	Partially	Source of verification: AP
1	13	Establishing the register of domestic and foreign tourists residing in Serbia	ITE Office	The Law has been approved by the Government; functional specification has been determined.	Partially	On 14 March 2019, the National Assembly adopted the Law on Tourism (<i>The Official Gazette of the Republic of Serbia</i> , Nos.36/2009, 88/2010, 99/2011 – as amended, 93/2012, 84/2015, 83/2018 – as amended and

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
						17/2019 – as amended), which, among other matters, regulates the matter of the Register.
2	1	<p>Adopt the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business, which will:</p> <ul style="list-style-type: none"> - regulate the electronic document (validity and the power of evidence, form of display, authentication of a printed copy of the electronic document, transmission of electronic documents between public authorities and parties) and make it possible to recognise electronic documents as equal to paper documents - regulate schemes of electronic identification (terms and conditions for schemes, level of reliability); - regulate qualified trust services (electronic signature, electronic cloud signature, electronic stamp, time stamp, electronic delivery, electronic storage of documents) which will, <i>inter alia</i>, enable a simple and cheap use of electronic certificates (by introducing a new service - qualified 	MTT	adopted	Yes	The National Assembly of the Republic of Serbia adopted the Law on Electronic Document, Electronic Identification and Trust Services in Electronic Business (<i>The Official Gazette of the Republic of Serbia</i> , No. 94/2017).

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
		electronic cloud signature), enable an exchange of documentation in the electronic form and destruction of paper documentation (in accordance with regulations governing office operations) when the service of qualified electronic storage is provided.				
2	2	Adoption of by-laws (17) for the application of the Law, in order for it to be fully applicable. Analysis and standardisation of the EU standards, on which by-laws will rely.	MTT	12 by-laws have been adopted	Partially	Source of verification: AP
2	3	Draft Law on Electronic Government has been prepared, which regulates the main principles of infrastructure and interoperability, prescribes main public registers and the management of documents/office operations, levels of authentication, etc.)	MPALSG	adopted	Yes	Draft prepared in 2017.
2	4	Defining technical standards for the internal and external form of electronic documents in administrative proceedings, as electronic forms for entering data necessary for resolutions of administrative proceedings.	ITE Office	Technical standards are prescribed in the list of interoperability standards, which was updated in March 2018.	No	It is also necessary to prescribe and implement forms for most common administrative procedures and forms for administration operations, in order to structuralise data for subsequent automatic importing into the system, which has not been done yet.

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activities	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
2	5	A single general act regulates the method of conducting public administration office operations (preparation of a single regulation concerning office operations which will also integrate two applicable regulations) for the purpose of the preparation for paperless office operations.	MPALSG	Formation of a working group and adoption have not been started, are planned by the end of the year.	No	Two parallel by-laws are in force: Regulation on Office Operations and Regulation on Electronic Operations. The Regulation on Electronic Operations was last amended in 2017, for the purpose of enabling the implementation of a unified procedure for the issuance of an e-Construction permit.
2	6	Conducted analysis of the usefulness of the obligation to authenticate handwritten signatures as a required legal form for the validity of the legal transactions	MESTD	Not started.	No	Analysis should take into consideration which legal transactions shall reasonably be authenticated at a notary (transactions in which a notary controls the legality of the operation) as opposed to legal transactions for which only signatures shall be authenticated, in which case signature by a qualified electronic signature should be prescribed. Revoke the legalisation of founding acts, except in the case of a stock company engaging in a purchase of a used motor vehicle.
2	7	Amendment of specific regulations in order to enable the conclusion of a legal transaction by an electronic certificate or handwritten signature on an electronic device (in order for the original document to exist in an electronic format)	MTTT	Regulated by by-laws for authentication and electronic signatures Not regulated for a handwritten signature on a pad,	Partially	It is necessary to prescribe the validity of a handwritten signature on an electronic device (pad) in procedures before the public administration, as well as in the case of signing certain documents (bills of lading etc.).
2	8	Active popularisation of the electronic document and popularisation of electronic communication in general.	MTTT, MPALSG	Trainings implemented under the NALED project ("Towards a paperless administration")	Yes	Trainings were implemented under the NALED project "Towards a paperless administration", supported by the Good Governance Fund.

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
		Organising practical workshops for employees which would cover exchanges of e-documents in business relations between two organisations (introduction of e-invoice) in the public sector, as an example of good practice.				
2	9	Preparation of instructions and training courses for all public administration bodies, on the method of recognising an e-signature, e-document, and method of implementing electronic office operations.	ITE Office	Training courses conducted, instruction/manual prepared	Yes	Activity to be incorporated into the new Programme and its implementation continued
2	10	Establishing the Central System for Qualified electronic registered delivery service	MTTT	To be adopted after the adoption of by-laws	No	The system has not been established, but a legal framework has been prepared, as the Law on Electronic Document provides for its existence.
3	1	A by-law prescribes methods used for levels of identification and authentication (e.g. what a person has, what they know and what they are).	MTTT	Regulation adopted	Yes	In March, the Government of Serbia adopted the Regulation on further conditions to be met by electronic identification schemes for certain levels of reliability.
3	2	Define, on the basis of analysis, and prescribe minimum levels of authentication of persons for certain procedures, primarily administrative procedures (intersectoral activity)	All public authorities with developed or developing electronic services	Authorities themselves will determine levels for each procedure in accordance with the Law on Electronic Government. (Medium level is recommended)	Decision-making on this matter is decentralised.	Recommendation: addressing these matters should be centralised after all; in the catalogue of services for citizens in the register of administrative corporate proceedings, minimum levels of authentication shall be defined for each service, so they would be more accessible to citizens, and in order to avoid that, for instance, local self-governments give different

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
						authentications for the same type of service/same procedure.
3	3	Establish a software solution for unification of systems for authentication of persons for using public services (banks, telecommunication operators, through debit cards and credit cards, e-Banking, SMS messages etc.)	ITE Office	Not started, preparation of functional specification in September and October and development by the end of the year	No	Model for the registration of eGovernment users at the single electronic point (the method of establishing user identity in communication with the eGovernment).
3	4	Improvement of the system of using the electronic certificate of Mol, which entails a possibility of using the certificate in a simple manner and simply integrating it in applications on different devices, regardless of the operational system (Android, iOS, MS...)	Mol	This activity has been deleted from AP because Mol did not have allocated funds in the 2018 budget.	Deleted	To be incorporated into the new Programme: a measure relating to the standardisation of qualified electronic signatures issued by different providers and enabling of receipt and opening of electronic documents signed by qualified electronic signatures, regardless of which provider has issued them.
3	5	Develop platforms ensuring the provision of electronic public services which would accept all registered e-identification schemes (e-authentication and e-signature).	ITE Office	Not done, functional specification for the e-Government Portal is under preparation. Reporting of registered schemes and implementation of solutions on the Portal is pending.	No	Incorporate an activity into a measure which will cover all related activities.

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
3	6	Establish a technical solution for the cloud certificate	ITE Office	Mol is not ready, while private providers are to prepare their solutions by the end of the year.	No	Discuss if this activity is to be carried over to a new programme, taking into consideration the availability of funds and the need for the state to provide the service of cloud signature, without any participation of the private sector.
4	1	Amend statutes in order to abolish mandatory transmission of evidence of payments for the provisions of public services	MoF MPALSG	Not started.	No	Recommendation: the Law on General Administrative Procedure and the Law on Electronic Government should explicitly prohibit public authorities from demanding evidence of payment for the provision of public services, and repeal all provisions of other regulations which stipulate such an obligation.
4	2	Provide a reference number or some other way to make it possible that data about real-time payments reach the competent authority for provision of services/collection of funds, which would provide the public authority which is acting in the matter with data on the payer and the amount and purpose of payment, as well as the fact that the service user is not obliged to submit any proof of payment as a mandatory step in the procedure.	MoF Treasury Administration	Functions only at the e-Government Portal	Partially	Recommendation: amend the Budget System Law, the Law on Republic Administrative Fees and the Law on Electronic Government in order to prescribe obligations of public administration bodies to provide parties with an account number to which payments will be made, so that such payments could be verified in a simple manner, i.e. matched to the payer and the matter in question. Possible alternative: this obligation may be prescribed in a by-law, such as the Rulebook on Terms and Manner of Keeping Public Revenue Accounts.

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
4	3	Introducing the possibility of paying public services through POS terminals	MoF Treasury Administration	Introduced in MoI - Traffic Police, RGA, City of Belgrade	Partially	Incorporate into the new Programme and continue with the introduction into other public institutions. Consider the option that, in case of cashless payments, transaction expenses may be covered by the budget (as an incentive measure for the purpose of the development of cashless payment and reduction of the use of cash, and reduction of misuses in cases of traditional payment slips.
4	4	Enabling payments through web-based and mobile applications for services which allow the option of electronic payment	MoF Treasury Administration	Done for web-based applications at the e-Government Portal, through Komercijalna banka	Partially	Out of 8,000 public services which have been identified through analyses, only 400 may be carried out electronically, and electronic online payment during electronic procedures is not even enabled for all of these 400 services.
5	1	Adoption of the Draft Law on the Archival Services and Archival Material	MoCI	Working Group shall prepare a draft and announce a public debate by the end of September Adoption is planned by the end of the year.	Yes	On 31 December 2018, the Ministry of Culture initiated a public debate about the Draft Law, which will last until 19 January 2019, Link: http://www.kultura.gov.rs/lat/dokumenti/javne-rasprave/javna-rasprava-o-nacrtu-zakona-o-arhivskoj-gradji-i-arhivskoj-delatnosti/analiza-efekta-nacrta-zakona-o-arhivskoj-gradji-i-arhivskoj-delatnosti
5	2	Setting the list of standards to be met by a body for conformity assessment and adoption of a regulation on terms and conditions for reliable electronic storage of documents in accordance with the previously adopted Law on	MTT	Prepared, sent for the final round of consultations	Yes	

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
		Electronic Document, Electronic Identification and Trust Services in Electronic Business				
5	3	Preparing an analysis of the current situation and needs of the existing and required infrastructure and archival materials of public authorities competent for electronic storage for establishing an electronic archive and compiling a Feasibility Study of the establishment of an electronic archive (an information system for permanent preservation of documents in the electronic form as archival materials)	MoCI MPALSG	Analysis has been prepared and will be published by the end of September.	Yes	Study published on the “Ask when” portal, supported by the Good Governance Fund
5	4	Preparing an analysis of deadlines and forms of storing business and administrative documentation, with recommendations for amendments to regulations and practical improvements. Amendment to the Regulation concerning categories of registry materials, with deadlines for their storage.	MPALSG	Model of the Regulation has been prepared and adjusted to the unification with the regulation on office operations, which will be drafted by the end of 2018.	Yes	Study published on the “Ask when” portal, supported by the Good Governance Fund

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
5	5	Prescribing misdemeanour responsibility of public authorities for failure to recognise digitalised documents stored in accordance with the law, where the original documents have been destroyed for the purpose of enabling the use and recognition of digitalised acts (To be entered into the penal provisions of the Law on Electronic Government)	MPALSG Administrative Inspectorate	Not prescribed	No	
6	1	Analysis a) of current hardware capacities of state bodies and organisations, b) assessment of required hardware and storage capacities for establishing a state cloud, c) required funds for providing the required hardware	ITE Office	done	No	
6	2	Decision on locations of the Data Centre (one or more) has been adopted	Government of Serbia	Kragujevac has been chosen	Yes	
6	3	Analysis of the readiness of existing systems for being used in the state cloud	Government of Serbia	not done	No	To be incorporated into the new Programme
6	4	Analysis of the needs of authorities for new applications	ITE Office	Not done. Authorities will apply as appropriate.	No	Incorporate into the new Programme, but define the subject matter of the analysis.
6	5	Action Plan for linking adequate applications on the state cloud, upgrading of applications or creation of new ones, if there is no way for	ITE Office	Not done, a consultant has been recruited to conduct an analysis.	No	Consider the possibility of incorporating this measure into the Programme and its redefinition, taking into consideration that it is necessary to previously define services which will

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
		them to be used on the cloud				be based on cloud technology/provided through the cloud.
6	6	An act defining the framework and type of cloud has been adopted.	ITE Office	By-law for the Data Centre has been prepared.	No	By-law for the Data Centre has not been adopted.
6	7	Establishing a national team for implementation, management and maintenance of the state cloud, appointment of an IT person for communication in each authority	Government of Serbia	Working group has been formed for the data centre.	Yes	Recommendation: strengthen the coordination of consultants working on this project - ITE Office and partners from the private sector.
6	8	Standards for technologies for the creation of a state cloud which should be used in cloud services in accordance with the needs (development methodology, technical frameworks etc.).	ITE Office	Consultant will deliver the analysis in 2019 (COTRA and UNDP projects)	No	
6	9	Adoption of a by-law which will prescribe the standard for work continuity (Disaster Recovery Standard) and hardware maintenance	ITE Office	By-law is under preparation	No	
6	10	Act prescribing control of the alignment of authorities' applications with the prescribed conditions has been adopted	MPALSG	Will not exist	Deleted	
6	11	State cloud covering applications ready to be used on the cloud has been established (stage 1)	ITE Office	Purchase of equipment is ongoing	No	Agreement has been signed with Oracle on the purchase of hardware and licences

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
6	12	Prepare training programmes for: 1) user training: use of cloud platforms, risk management, data protection, 2) training for IT experts: additional training for establishing continuity and high expertise level of the IT staff	MPALSG	Prescribed in projects implemented in 2019	No	
6	13	Improvement of the regulatory framework for personal data protection which are on the cloud and in the personal data location	MESTD	Draft law submitted for opinions.	Partially	
6	14	Preparation of Draft Amendments to the Law on Information Security for the purpose of alignment with new European legislation	MTTT	Working Group is being formed	No	
6	15	Adoption of internal documents and instructions for safe use of the cloud, personal data protection, risk analysis	All authorities of which applications are used on the cloud	Most authorities have no safety act/do not apply it.	No	
6	16	Establish a technical solution for identification, qualification and response to incidents in the network of state bodies	ITE Office	Established only for the national CERT Donor funds € 300,000 (funds have not been provided)	Partially	
6	17	Impact analysis of implemented activities and drawing up a plan for further upgrading of the state cloud by linking new applications (stage 2)	ITE Office	COTRA shall conduct an analysis of the State Data Centre in 2019	No	

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
7	1	Adoption of the Law on Electronic Government, which will regulate the manner of opening accounts on the Portal, authentication, manner in which service users are using the Portal, and obligations of the authorities	MPALSG	adopted	Yes	
7	2	Adoption of a by-law which will regulate the manner of uploading and updating the content and functionalities at the Portal	MPALSG	To be adopted by October	Yes	
7	3	Mobile-friendly functional redesign of the Portal, with improvements of the existing modules; implementation of a new method of creating accounts and performing user identity checks and linking to the Metaregister (before an authority or by using a certificate)	ITE Office	Functional specification is being prepared; the Portal should be created by March 2019	No	
7	4	Establishing a module at the Portal for exchange of data from eZUP registers	ITE Office	Established for 20 registers which have the required technical capacities	Partially	
7	5	Generating electronic forms (application forms) for conducting administrative proceedings, into which data from official records will be automatically entered	ITE Office	Preparation of new forms is ongoing (by SCTM, the Secretariat (PPS), GIZ)	No	
7	6	Establishing a unified electronic mailbox for electronic delivery	ITE Office	Not started, will be established by mid-2019	No	

Evaluation of the implementation of individual measures/activities pursuant to the Action Plan 2017–2018						
Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
7	7	Establishing a new method of creating accounts and performing user identity checks for an access to the data from the register	ITE Office	Not started, will be established by mid-2019	No	
7	8	Establishing a Coordinating Body for an improvement of electronic services (analysis of the existing legal and technical framework and proposing new solutions, e.g. mobile phone applications, etc.)	ITE Office	Coordination Council for eGovernment was created in November 2017	Yes	
7	9	Establishing selected new mobile-friendly services and improvement of existing services for citizens on the e-Government Portal	ITE Office	Not started, will be by the end of 2019	No	
7	10	Establishing selected new mobile-friendly services for corporate clients on the e-Government Portal (e.g. wealth tax return for taxpayers who keep business records)	ITE Office	Not started, will be by the end of 2019	No	
7	11	Establishing the software solution e-Inspector and purchase of equipment	ITE Office	For 4 inspectorates, application will start by the end of 2018 and for 32 inspectorates at the level of the Republic, by mid-2019	No	Not yet started. In November and December 2018, inspectors of the Market Inspection, Labour Inspection, Administrative Inspection and Sanitary Inspection attended training courses in the Serbia–Korea Centre.
8	1	Accession to the Open Data Charter	Government of Serbia	Charter has been signed.	Yes	

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Group of measures	Number of activity	Activity	Lead implementing authority	Status of implementation (according to the Working Group's reports)	Assessment of the finalisation	Comment
8	2	Legally define the right to re-use of data, obligation to publish data in open formats, and organise the Open Data Portal.	MPALSG	Regulated by the Law on e-Government	Yes	
8	3	Improvement of the design and functionality of the Open Data Portal - establishing an access to records created during the activities of public administration bodies through API and other models, and entering statistical data (indicators, codebooks, classifications, geospatial data, etc.).	ITE Office	Improved functionalities	Yes	
8	4	Organisation of thematic hackathons with a view to promoting the open data concept	ITE Office	Open data week organised in May 2018 Public call announced for the creation of open data applications	Yes	