

BETWEEN ANTI-CORRUPTION REFORM AND DECLINE

**Examining key actors, strengths and weaknesses
in the Western Balkans and Türkiye's national
integrity systems**



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Regional report

Between anti-corruption reform and decline

Examining key actors, strengths and weaknesses in the Western Balkans and Türkiye's national integrity systems

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EXECUTIVE SUMMARY

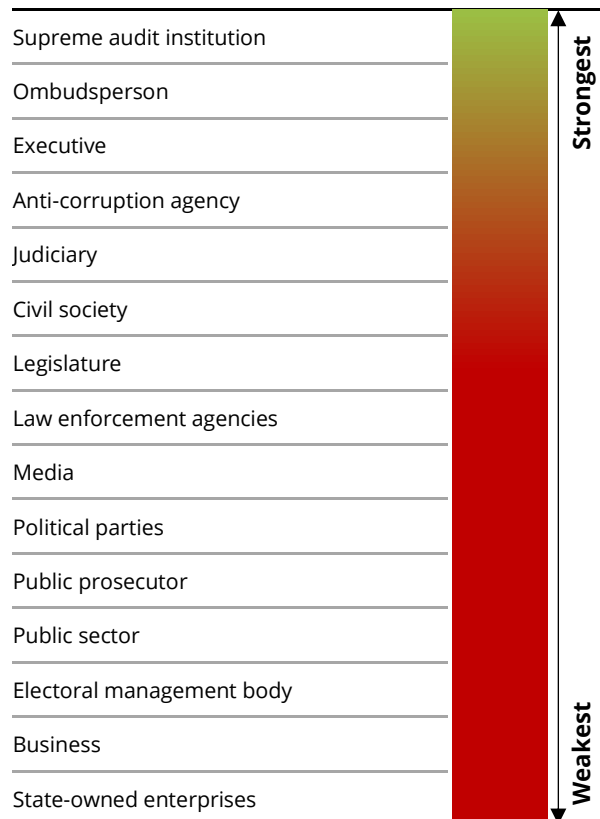
Despite a variety of political and public sector integrity reforms, partly intended to make progress towards EU integration, people still see corruption as one of the biggest problems in the Western Balkans and Türkiye.¹ Corruption harms the region in various ways, such as distorting policymaking and accountability mechanisms, undermining democratic institutions, and decreasing public trust in government across the region.

The national integrity system (NIS) assessments carried out between September 2022 and December 2023 by Transparency International chapters and partners in the Western Balkans and Türkiye confirms the public’s concerns. The assessments reveal a complex mixture of slow and limited progress in strengthening integrity systems, along with democratic backsliding that strongly augments corruption levels. The findings presented in this report stem from a comprehensive analysis of the resources, independence, transparency, accountability and integrity of institutions and non-state actors that play key roles in the fight against corruption. The report identifies six critical areas warranting further anti-corruption efforts: separation of powers between the executive and legislative, the justice sector, political integrity, public sector integrity, oversight institutions, and civil society and the media, in their role as anti-corruption watchdogs.

Overall, the assessment has identified institutional strengthening efforts in **Kosovo, Albania and North Macedonia** over the last three years. Conversely, it found signs of stagnation or even decline in the institutional strength of the other four countries. In **Serbia**, anti-corruption efforts are overshadowed by the ongoing process of weakening of democratic institutions and strengthening of the president’s influence. In **Türkiye**, anti-corruption efforts have retreated amid the consolidation of the country’s autocratic regime. **Bosnia and Herzegovina** shows some progress, but remains impaired by the complexities of its system of government and

internal disputes, which block reforms and lead to misaligned rules between the state and the entity level (Federation of Bosnia and Herzegovina and Republika Srpska).² **Montenegro** has been grappling with political instability, with three governments in three years, after breaking out from three decades of rule by the Democratic Party of Socialists in 2020. While the former ruling party may have lost institutional power, its networks still exert considerable informal influence across much of the public sector. This is instrumental in maintaining elements of state capture and accompanying impunity that have destabilised subsequent governments.

COMPARISON OF AVERAGE SCORES PER PILLAR IN NATIONAL INTEGRITY SYSTEM ASSESSMENTS IN THE WESTERN BALKANS AND TÜRKIYE



Despite differences between the countries, the NIS assessment shows that the focal point of both strengths and weaknesses in these national integrity systems lies in the executive. On one hand, the executive holds significant power, positioning it as a pivotal actor capable of driving and implementing crucial national reforms. This is the case, for example, in **Kosovo** and **North Macedonia**, where a greater separation of powers has enabled the most progress in anti-corruption reforms in the region. However, this position becomes a vulnerability when the executive is compromised by the vested interests of powerful political party leaders and their cronies, in their pursuit of illicit gains and sustaining political power. This is particularly true for countries with weaker separation of powers, such as **Türkiye** and **Serbia**.

Executive interference with the judiciary and public appointments, and the executive patronage networks that thrive amid flawed internal party democracy are among key weaknesses this report finds across the Western Balkans and Türkiye. Along with favouritism in public procurement, which also remains an area of concern, these three vulnerabilities to state capture were also identified in earlier national integrity assessments covering 2014-2015 and 2017-2018.³ State capture “is understood as efforts by private actors and public actors with private interests to redirect public policy decisions away from the public interest, using corrupt means and clustering around certain state organs and functions”. Some scholars argue that this can be seen as a “new variant of state capture”.⁴

The key weaknesses identified by the national integrity system assessments across the Western Balkans and Türkiye can provide additional explanations for vulnerability to state capture in these countries. Conversely, the presence of such vulnerabilities explains why key weaknesses outnumber key strengths due to their cross-cutting nature, affecting a variety of institutions and smothering checks and balances between the institutions and key actors assessed here.

KEY STRENGTHS

- + **Stable oversight institutions:** A notable strength across the countries in the region lies in oversight institutions that are mostly robust, especially the supreme audit

institution and the ombudsperson. However, their effectiveness is often limited by a lack of enforcement power, the executive not acting on their recommendations, and the legislature not controlling the executive properly. The anti-corruption agency is a stronger actor in some countries, such as **Kosovo** and **North Macedonia** – depending on the scope of its mandate – but in every country it lacks criminal investigation power. Overall, this means that the best-performing institutions according to the NIS assessment are mostly those with no actual power to affect overall institutional integrity.

- + **Independent civil society and investigative media:** Despite being weaker than several other key pillars, independent civil society and investigative media keep up the fight against challenges to civic space, such as restrictive laws or verbal and physical attacks. Further challenges to independent investigative journalism on a larger scale include a concentration of media ownership involving close ties to ruling parties or parties previously in power, leading to biased and uncritical reporting. For civil society, challenges include a lack of government action on their recommendations or only pro-forma civil society involvement in policy development. Civil society effectiveness is highest in countries in the region where power is less concentrated in the executive, and vice versa.

KEY WEAKNESSES

- + **Lack of independence and accountability in the justice sector:** Despite reforms and progress in some countries, a lack of independence from political powers and their patronage networks in the judiciary, prosecution services and law enforcement remains one of the biggest cracks in the pillars holding up the national integrity system. This leads to frequent impunity for corruption and weak accountability within the justice system itself. The lack of independence is mostly driven by political appointments, but also by threats of

- transfer or dismissals. In **Albania**, where accountability has been enforced through vetting of judges and prosecutors for integrity, this resulted in a high number of dismissals – some arbitrary – and created a shortage of human resources, contributing significantly to a backlog of cases. This shows that solutions to these prevalent issues need to be carefully balanced and learning must be drawn from vetting and other mechanisms aimed at making the justice sector more independent and accountable.
- + **Political interference in public-sector appointments:** A significant state capture vulnerability arises in the process of appointing individuals to high public positions, particularly in oversight institutions and state-owned enterprises. The prevailing practice in many Western Balkan countries and Türkiye revolves around clientelist considerations. The prospect of privileges associated with membership in ruling parties, such as access to high-level positions, is a major incentive for many to join these parties. Often, individuals choose party membership not out of political conviction, but for career advancement opportunities. This is due to the power dynamics of ruling parties and parliamentary majorities in appointments, and their clientelist networks in recruitment. Perceiving these appointments and public-sector recruitments as non-merit-based, citizens lose confidence in the integrity of public institutions as a result.
 - + **Weak democracy within political parties:** A key enabler for “strongmen” in the executive, and an impairment to separation of power between the executive and legislature, is a lack of democratic processes within the majority of political parties in power. This enables members of clientelist networks to get ahead in society through their political party. Often political parties and these “strongmen” instrumentalise ethno-nationalistic identification, rather than developing long-term, honest programmes that enable voters to choose who truly best represents their political beliefs and interests. However, this does not uniformly apply to all parties across the region. There are smaller parties that introduce diversity to political dynamics, promoting inclusive agendas and inter-ethnic harmony. These parties reflect the aspirations of the region’s most progressive segments and are vital for societal reform.
 - + **Open avenues of influence through party financing:** Undue influence and corruption in politics are enabled by legal gaps, such as a lack of regulation and reporting obligations on candidate (self)-financing and third-party campaigning, as well as a lack of transparency over companies’ beneficial ownership. Without such transparency, complex webs of fictitious and offshore companies can be used to channel illegal donations.
 - + **Poor election management:** Challenges remain in the management of elections, including inaccuracies in voter lists and a lack of impartiality and transparency within electoral commissions, especially at the local level. Flawed electoral processes are eroding public trust in the democratic system, with **Serbia** and **Türkiye** showing signs of democratic decline and alleged manipulation of the voting process through vote buying and fraud.⁵
 - + **Insufficient steps toward key political and public integrity legislation, along with poor enforcement and oversight:** There are efforts in all countries to establish legislation on political and public-sector integrity, including laws on political finance, conflict of interest, asset declarations, public procurement, the right to information and, in some countries, whistleblower protection and lobbying control. However, notable gaps in the legal framework are not addressed promptly, and policy processes amending such laws lack civil society involvement. Legal amendments are sometimes even used to establish new loopholes that weaken political integrity mechanisms. Enforcement remains the biggest issue, due to ineffective oversight, linked to a lack of resources, capacities and enforcement power.
 - + **Public procurement marked by favouritism and lack of oversight:** Business environments are tainted by favouritism, with government contracts or incentives awarded based on personal connections and bribery, rather than merit. This unduly privatises public resources and creates an uneven playing field, limiting

competition and preventing citizens from getting the best value for public money. It also harms the business sector, and erodes public trust in the integrity of public spending.

- + **Insufficient gender mainstreaming:** Across all countries in the region, complaint and investigation mechanisms within the justice sector, the public sector and oversight institutions lack gender-sensitive protocols and do not publish gender-disaggregated data on complaints. There is some level of gender-sensitivity training, but this focuses primarily on violence against women. There is also a clear gap in addressing areas of intersection between corruption and gender, such as sextortion.⁶

PRIORITY RECOMMENDATIONS

To address the main weaknesses identified in the integrity systems throughout the Western Balkans and Türkiye, it is essential that national governments, justice and oversight institutions, political parties, civil society and the media implement this assessment's recommendations. They must fully acknowledge the corruption risks Transparency International flags and take necessary actions to enhance governance and integrity standards in the region. This report outlines priority recommendations below, and presents further actions at the end of each chapter. Wider-ranging, country-specific recommendations are provided in the separate national integrity system assessment reports.⁷

The recommendations in this report are structured around the six critical areas warranting further anti-corruption efforts. Additional specific recommendations support EU actors to promote the implementation of priority recommendations for the countries in the region.

Separation of powers

- + National legislatures must take comprehensive steps to fully embrace their oversight role and increase their proactive use of oral and written questions, interpellations and committees of inquiry to hold the executive accountable.
- + As a priority, political parties must foster pluralistic political debate and adopt democratic internal processes to reduce the concentration of power within party

leaders and a narrow circle close to them. Party leaders must be elected in pluralistic races by all members on the principle of "one member, one vote", with a limited number of terms in office. Party assemblies, open to all members, must take place at least once a year, and a special assembly should be called before each national election, enabling internal referenda on key decisions about the parties' political programmes.

Justice sector

- + National governments and parliaments must prioritise amending relevant laws and establishing processes to clearly outline objective, transparent and merit-based systems for the appointment, transferral and dismissal of judges and prosecutors.
- + In collaboration with the government and the legislature, the justice sector must focus on delivering independent, transparent disciplinary proceedings among the judiciary, prosecution services and law enforcement, by conducting such proceedings in suitable timeframes and respecting due process. Countries must also take action to establish and enforce proportionate sanctions that provide effective deterrence.
- + National governments and parliaments in **Bosnia and Herzegovina, Montenegro** and **North Macedonia** must set up an independent body, with support from international partners, to implement fair, high-quality integrity vetting processes for judges and public prosecutors, using sound criteria. This should be based on a thorough evaluation of similar processes in **Albania**, to identify lessons learned.
- + It is essential that the justice sector implements comprehensive, standardised gender-sensitive protocols and guidelines across all investigation and complaints mechanisms, especially to foster a better understanding of sextortion cases.

Political integrity

- + It is vital that national governments and parliaments make legislative amendments that explicitly subject campaign donations and expenditures by candidates and third parties to the same limitations and reporting requirements as political parties. Parties must publish on their websites a list

of donors, covering natural and legal persons, and update this within a week of a donation being received.

- + National governments and parliaments must adopt clear provisions to prevent the abuse of state resources for election campaign support, vote-buying, voter coercion and other forms of abuse stemming from positions of power. Measures must include limits on public expenditure, and rules governing public officials' behaviour during elections.
- + National governments and parliaments need urgently to amend the legal frameworks governing elections and to improve the appointment process, independence and effectiveness of local election commissions and polling station committees. Lawmakers must enhance transparency in appointment procedures, establish independence criteria for members of municipal election commissions, and introduce non-partisan members into polling station committees to strengthen the electoral process.
- + In line with The Group of States against Corruption (GRECO) recommendations, governments at all levels must adopt a credible, uniform legislative and institutional framework for preventing conflicts of interest, by extending the breadth of its application and the depth of reporting.
- + Oversight institutions must take steps to ensure they thoroughly verify all asset declaration submissions for accuracy and omissions, in a timely manner. This process should follow the detailed advice of the Stolen Asset Recovery Initiative, based on extensive government surveys, on how to design and implement an appropriate verification strategy. Oversight institutions must also ensure comprehensive publication of asset declarations on their websites, in a machine-readable manner and via a dashboard with easily understood data for the general public. They should consult data users, including journalists and civil society organisations, before, during and after publication, to ensure that the supply of data matches demand, and is functionally useful for accountability. It is essential that institutions also apply a range of appropriate penalties to those who

provide information that is incomplete, inaccurate or late.

Public sector integrity

- + As a priority, public-sector institutions must ensure that systems for the appointment, recruitment, retention, promotion and retirement of public officials and other non-elected officials are based on the principles of efficiency, effectiveness, merit, equity and aptitude. Special measures should be applied for corruption-prone positions, such as pre-screening, integrity training, and specific checks and audits, including verification of asset declarations.
- + Public-sector institutions must strengthen public stakeholders' roles in overseeing public procurement processes, and ensure that all necessary data are publicly available throughout all phases. They must also provide sufficient financial and human resources to oversight bodies and commissions in charge of handling complaints on public procurement.
- + Public-sector institutions, especially oversight institutions, need to consult civil society organisations in the development of complaints mechanisms, including specialists in gender issues and women's rights, to introduce gender-sensitive protocols into their complaint and investigation mechanisms.

Oversight institutions

- + As an urgent measure, national governments and legislatures provide more financial and human resources to:
 - anti-corruption agencies in **Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia, and Türkiye**
 - supreme audit institutions in **Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, and Serbia**
 - electoral management bodies in **Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Türkiye**
 - Ombudsperson institutions in **Albania, Bosnia and Herzegovina, North Macedonia and Serbia.**
- + It is also essential that national legislatures establish and impose measures that effectively compel government officials to

respond to oversight actions. Measures can include censure of non-compliant executive officials, recommendations for executive action against such officials, and suspension of bills before parliament sponsored by non-compliant ministers. Where applicable, an offence of contempt of parliament should be legally established and imposed in cases of unjustified, repeated refusal by officials summoned to appear before parliament, or for those giving false information.

- + National governments and legislatures must increase the mandate and capacities of anti-corruption agencies to conduct criminal investigations.
- + National governments and parliaments need urgently to amend relevant laws to ensure objective, transparent and merit-based systems for the appointment, transferral and dismissal of leadership positions within oversight institutions.

Civil society and the media

- + National governments and legislatures must promptly review and amend laws currently being misused to silence critical voices in civil society and the media,⁸ and establish thorough monitoring of attacks and safety mechanisms. This includes – but is not limited to – defamation laws, strategic lawsuits against public participation (SLAPP) and foreign agent laws. In this regard, align laws with the new EU Anti-SLAPP Directive.
- + It is essential that national governments and parliaments improve transparency in ownership of broadcast, print and online media, through appropriate and detailed public registers of ownership. Similarly, public funding of the media needs to be awarded through public bids and transparent, outcome-based evaluations.

The role of the European Union

The European Commission regularly assesses candidate countries' readiness for EU membership across various policy areas, with particular emphasis on anti-corruption and national integrity, especially against chapters 23 and 24 of EU accession negotiations on the rule of law. Although concrete target dates for EU membership for the countries in the region have not been set, the EU has focused on enhancing incentives for candidate countries through increased funding opportunities, closer

economic integration and political exchange. The adoption of a new methodology for accession negotiations in 2020 aimed to accelerate integration by offering benefits of EU membership in return for reforms. However, tangible progress has been slow. The European Commission proposed concrete steps for accelerated integration and increased financial support for the Western Balkans in November 2023. This plan emphasises the importance of socio-economic and rule-of-law reforms. Similarly, a proposal for reshaping EU-Türkiye relations underscores the need to address human rights and rule-of-law concerns.

Until the end of 2027, the New Growth Plan for the Western Balkans is expected to be the cornerstone of the EU conditionality policy towards the region. In developing reform plans for individual countries, and to support the implementation of recommendations provided in this report, the European Commission should insist on strict conditionality, including achieving medium-term goals by the end of 2025, and long-term goals by the end of 2027:

- + Launch integrity vetting processes for the judiciary and public prosecution in **Bosnia and Herzegovina, Montenegro and North Macedonia**, and improve systems of integrity within the current constitutional framework in **Serbia and Türkiye**.
- + Involving civil society, revise relevant laws to strengthen the independence of public sector institutions by ensuring more objective, transparent and merit-based systems for the appointment, transferral and dismissal of leadership positions in all public-sector institutions, especially oversight institutions.
- + Improve and enforce laws on public procurement, the right to information, whistleblower protection and the alignment of relevant laws with the relevant EU directives.

In addition, it is essential that the European Commission:

- + Develop, as a priority, anti-corruption benchmarks in line with the 2020 methodology for accession negotiations, with a concrete list of incentives for their implementation.
- + Expand the logic behind the New Growth Plan for the Western Balkans of offering

- funding or other benefits linked to reforms, including rule of law, to Türkiye.
- + Link vital rule-of-law reforms with an offer of stronger economic integration and visa facilitation.
 - + Conduct studies on the effectiveness of the vetting processes in **Albania** and **Kosovo**, and lessons learned from it, as well as what to consider when implementing such processes in other countries in the region.
 - + Establish high-profile, long-term programmes that monitor attacks against journalists and activists, provide safety training and enable affected actors to collectively push back against attacks and hold law enforcement, prosecution services and the judiciary accountable for insufficient responses.
 - + Produce and publicise reports for all Western Balkan countries and Türkiye using the European Commission's methodology from the annual Rule of Law Report. The commission has started reports for Albania, Montenegro, North Macedonia and Serbia, and should do so for Bosnia and Herzegovina, Kosovo and Türkiye.

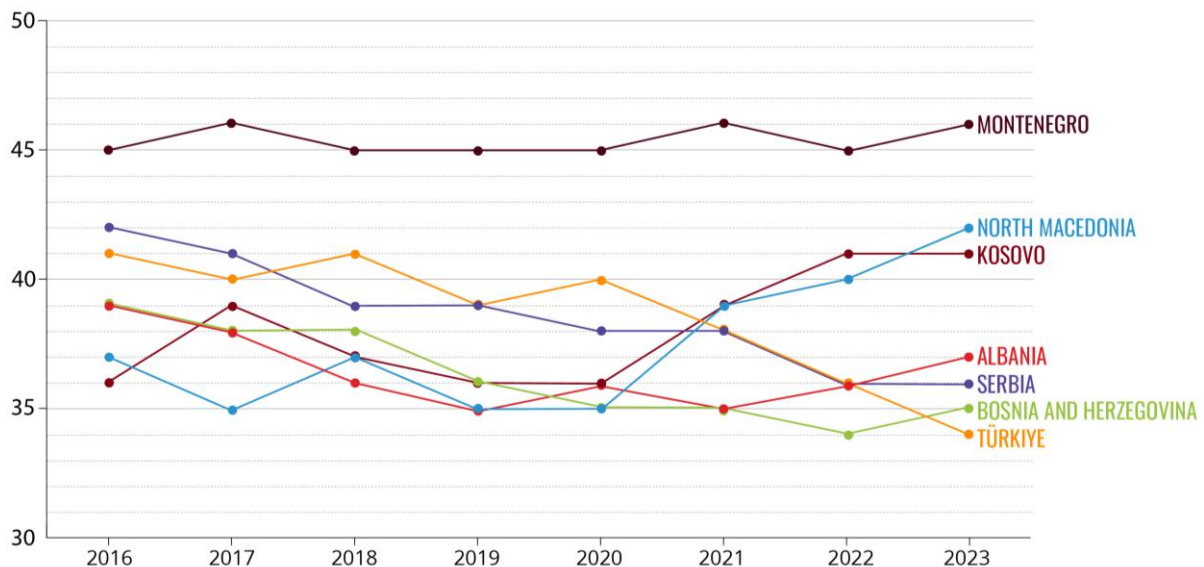
INTRODUCTION

In the Western Balkans and Türkiye, the efforts made to fight corruption and the resulting outcomes vary from initiating quite significant reforms, to actively eroding anti-corruption frameworks as a means to solidify the power of ruling elites and as an aspect of democratic decline.

Kosovo and **North Macedonia** emerge as promising examples in the fight against corruption, achieving an upward trajectory in their scores on Transparency International's *Corruption Perceptions Index* (CPI) since 2016 – the last time Transparency International conducted a national integrity system (NIS) assessment in the region. Meanwhile, **Albania's** CPI scores show stagnation, despite significant reforms – notably the rigorous vetting

process within the judiciary and prosecution – indicating reforms still need time to show impact, and additional efforts are needed. **Montenegro**, too, finds itself in the web of stagnation, due to a lack of substantial reforms. The failure of several government coalitions since 2020 has contributed to this, but overall, these governments have shown little political will to implement key reforms that would increase the country's ability to deal with corruption. However, its CPI score is the highest in the region, and is substantially higher than **Serbia**, **Bosnia and Herzegovina**, and **Türkiye**, all of which struggle with specific governmental challenges blocking and diverting attention from addressing corruption issues.⁹

Graphic 1.1: *Corruption Perceptions Index* scores in the Western Balkans and Türkiye, 2016-2023¹⁰



This can be seen in **Bosnia and Herzegovina**, where the authorities of Republika Srpska constantly raise threats of secession and drive persistent initiatives to weaken state-level institutions and their authority, including the judiciary and the election administration. **Serbia**

faces the aftermath of the 2023 parliamentary election in which the International Election Observation Mission by the Organisation for Security and Co-operation in Europe – Office for Democratic Institutions and Human Rights (OSCE-ODIHR) highlighted clear examples of vote buying,

breaches of vote secrecy, and undue influence on voters.¹¹ However, there is still no outcome of any investigation by public prosecutors related to such cases reported by political parties and citizens.¹²

Türkiye has seen a vast democratic decline since the change from a parliamentary system to a presidential one, following the attempted coup d'état in 2016.¹³

THE NATIONAL INTEGRITY SYSTEM

The NIS assessment approach provides a framework for analysing the robustness and effectiveness of a country's institutions in preventing and fighting corruption. The concept has been developed and promoted by Transparency International as part of its holistic approach to countering corruption. A well-functioning national integrity system provides effective safeguards against corruption as part of the larger struggle against abuse of power. When institutions are characterised by a lack of appropriate regulations and accountability, corruption is likely to thrive, with negative effects for equitable growth, sustainable development and social cohesion. Strengthening national integrity systems promotes better governance and ultimately contributes to a more just society.

This report presents a diverse picture of efforts and levels of reform, accountability mechanisms to hold power to account, and non-state actors becoming stronger despite repressive and discouraging action by the state. While the countries in the Western Balkans and Türkiye should not be seen as a homogenous entity, some common strengths and weaknesses in the region can be identified.

EU INTEGRATION PROCESS

The European Commission publishes regular assessments of candidate countries' level of preparedness for EU membership, covering the 33 policy areas of accession negotiations. In terms of anti-corruption and national integrity, the most important areas are related to the rule of law: chapter 23 (judiciary and fundamental rights) and chapter 24 (justice, freedom and security).

The most recent assessment for the Western Balkans and Türkiye, published in November 2023, showed a mixed picture.¹⁴ **Montenegro**, which has been negotiating chapters 23 and 24 the longest, is also the most prepared candidate for EU membership. But in the 10 years since negotiations on these two chapters were opened, the country is still far from closing them, and did not even implement interim benchmarks for their closure. **Serbia**, the only other candidate that has opened negotiations on the two chapters, is doing worse seven years after their opening than **North Macedonia** and **Albania**, and as badly as **Bosnia and Herzegovina**. Compared with the 2015 assessments, most candidates remained at the same level.¹⁵ Only **Albania** and **North Macedonia** had made progress, while **Türkiye** regressed.

These assessments largely correspond with those of Transparency International's NIS assessments. Since 2019, confronted with fading ability to motivate reforms in candidate countries, the EU and its member states reassessed their strategies. Short of political willingness to offer a concrete target date for EU membership, the EU focused on boosting incentives for candidate countries, from funding opportunities and closer economic integration, to increased political exchange.

Table 1.1: European Commission assessment of the level of preparedness for EU membership, November 2023

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Chapter 23 <i>Judiciary and fundamental rights</i>	Some level/ Moderately prepared	Some level of preparation	Early stage/ Some level of preparation	Moderately prepared	Some level/ Moderately prepared	Some level of preparation	Early stage
Chapter 24 <i>Justice, freedom, and security</i>	Some level/ Moderately prepared	Some level of preparation	Early stage/ Some level of preparation	Moderately prepared	Moderately prepared	Some level of preparation	Moderately prepared

Scale used by the European Commission: Early stage; Some level of preparation; Moderately prepared; Good level of preparation

In 2020, the EU adopted a new methodology for the accession negotiations with the **Western Balkan** candidates.¹⁶ The bloc agreed to identify “opportunities for accelerated alignment and integration in all EU policy areas, with clear benefits for European Union and candidate countries.”¹⁷ The logic behind this was to blur the line between being inside and outside the EU, by offering various benefits of EU membership in return for implementation of the rule of law and other reforms.

However, this proved easier said than done. It was only in November 2023 that the European Commission came out with a proposal to make this idea of “accelerated” integration more concrete.¹⁸

In April 2024, the New Growth Plan for the Western Balkans was approved by the European Parliament and the Council of the EU. It offers the Western Balkans access to the seven areas of the EU Single Market and increased financial support by 2027 (up to €6 billion).¹⁹ For the six Western Balkan governments to receive financial support, the European Commission will request from them implementation of a concrete, tailor-made list of reforms, with firm deadlines. In developing the list of reforms, particular attention will be on socio-economic measures and reform supporting the rule of law.

In November 2023, the European Commission also adopted a document proposing ways to shape EU-Türkiye relations in “a more strategic and forward-looking way.”²⁰ The document, which is currently being discussed by EU member states, notes the country’s difficult human rights and rule-of-law situation, and acknowledges that accession negotiations have effectively been at a standstill since 2018. In its recommendations, the document calls for dialogue on the rule of law to remain an integral part of the relationship, and proposes specific socio-economic benefits that the EU could offer **Türkiye**, from high-level political meetings and visa facilitation, to the renewal of economic relations.

While the focus on boosting incentives is important, developments in **Montenegro** in 2024 highlight the need for candidate governments to address reforms as well. The new Montenegrin government has, in 2024, made several concrete steps towards the implementation of interim benchmarks for chapters 23 and 24, through appointments of key positions in the judiciary. But several more measures are still pending. If these are implemented, the EU’s ability

to respond positively will be crucial for an effective knock-on effect on other candidates.

REGIONAL PRIORITIES

While this report groups six distinct countries (Albania, Bosnia and Herzegovina, Kosovo, Montenegro, North Macedonia and Serbia) under the term “Western Balkans” and highlights shared issues between them and Türkiye, it also recognises the limits of such an approach. It is important to understand the unique situation in each country, in order to develop targeted policy solutions in the fight against corruption. It must also be recognised that these countries have already gone beyond the legal standards of some EU countries – for example, in terms of laws on asset declaration or public procurement. It is the enforcement of these laws that remains the biggest issue.

The report delves deeply into the key strengths and weaknesses of each national integrity system, highlighting the main areas in need of reform. These include:

- + The independence and accountability of the justice sector, which, despite reforms, displays either high levels of impunity or a lack of resources, which creates further impunity through a backlog of cases that are not prosecuted within time limits or investigated at all.
- + The lack of separation of power between the executive and the legislature, marked by “strongmen” political leaders who are enabled by a lack of internal democratic processes within political parties.
- + Political integrity mechanisms, enforcement gaps and weak election management.
- + A public sector deeply influenced by party politics, linking career progression to clientelist loyalty instead of merit-based advancement, and showing a lack of enforcement of key mechanisms for transparency, accountability and integrity.
- + Oversight institutions, which emerged in the NIS assessments as the strongest actors, but which are often limited by issues linked to capacity, mandate and parliamentary support.
- + Independent civil society and the investigative media, who maintain the fight against corruption despite challenges to civic space.

METHODOLOGY

The national integrity system (NIS) methodology is an approach developed by Transparency International to assess the effectiveness and robustness of a country's institutions in preventing and combatting corruption.

Transparency International's national chapters in **Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia and Türkiye**, and partner organisations in **Albania** (IDM) and **Montenegro** (MANS), conducted research between October 2022 and November 2023, analysing the robustness and effectiveness of each country's institutions in preventing and combatting corruption. This report synthesises the findings of the national integrity system assessments conducted in these countries.

Transparency International has implemented this methodology in more than 100 countries, including previously in the Western Balkans and Türkiye, in 2012 and 2016. Over the years, the methodology has been reviewed, updated and tailored to the region – for example, by adding a pillar on state-owned enterprises. For this round, the NIS assessment has been updated to reflect the cross-border nature of corruption, by adding an indicator on mutual legal assistance and guiding questions in the business transparency indicator on beneficial ownership transparency.

Graphic 2.1: The 15 pillars of the national integrity assessment methodology



Additionally, gender indicators have been added to all pillars except that on state-owned enterprises. These indicators measure gender representation in the legislature, the executive, the electoral management body, political parties and business. They also assess gender sensitivity in complaints and investigation mechanisms for the judiciary, the public prosecutor, law enforcement agencies, the ombudsperson, the supreme audit institution and the anti-corruption agency, as well as gender-sensitive programming in civil society and gender-inclusive reporting by the media.

DIMENSIONS

Each institution and sector within the national integrity system is assessed along three essential dimensions:

Overall capacity: This examines the institution's resources and legal status, forming the foundation for effective institutional performance.

Internal governance: This focuses on transparency, accountability and integrity within an institution, including mechanisms such as the right to information, whistleblower protection and controls on the "revolving door" between the public and private sectors.

Role fulfilment/effectiveness: This assesses the extent to which an institution fulfils its assigned role in the anti-corruption system, such as oversight of the government, or engagement with civil society and government in the fight against corruption.

MEASUREMENT OF INDICATORS

Common sets of indicators are used to measure each dimension, considering both the legal framework and institutional practices. The assessment combines primary and secondary data, including national legislation, secondary reports and research articles, and expert interviews. The scoring is guided by a set of score sheets, consisting of a "scoring question" for each indicator, supported by further guiding questions and scoring guidelines. While the NIS is a qualitative assessment, numerical scores are assigned to summarise the information and to help highlight key weaknesses and strengths of the integrity system. Scores are assigned on a 100-point scale in 25-point increments, including five possible values: 0, 25, 50, 75 and 100. Qualitative information gathered informs the attribution of scores for each indicator, aggregated to produce an overall score for each dimension and the institution overall.

For clarity, the scoring of NIS indicators is represented by a traffic-light system:

- NIS scores below 34 show a clear lack of effort or success in interventions.
- NIS scores from 34-66 show weak to moderate efforts in interventions.
- NIS scores over 66 show good efforts and some success in interventions.

Graphic 2.2: Dimensions and indicators of each pillar of the national integrity assessment methodology

Dimensions	Capacity				Governance						Role
Indicators	Resources		Independence		Transparency		Accountability		Integrity		Pillar specific
	Law	Practice	Law	Practice	Law	Practice	Law	Practice	Law	Practice	Law and Practice

DATA COLLECTION AND VERIFICATION

Data collection methods primarily build on desk reviews of legislation, policy papers and analyses, news articles, and official government reporting and statistics. Where gaps exist in terms of publicly available information, researchers used expert interviews and freedom of information requests.

The data validation process involved several methods: ongoing internal validation check-ups to ensure continuous scrutiny; validation meetings of an advisory group previously established by the national partner; external expert reviews, and national integrity workshops with experts from different fields, including state officials, researchers, civil society experts and journalists.

QUALITATIVE ASSESSMENT

The assessment is primarily qualitative, aiming to provide a nuanced understanding of the integrity of each institution. Researchers evaluated legal provisions and compared them with practices on the ground, highlighting any discrepancies between formal regulations and real-world implementation.

COUNTRY REPORTS

The resulting country reports provide a comprehensive understanding of the national integrity system, covering over 150 indicators. Readers seeking a detailed profile of a specific country's situation should refer to the National Integrity System reports published by Transparency International's national chapters and partner organisations.

REGIONAL ANALYSIS

The report presents a regional analysis based on the substantive information gathered from the seven National Integrity System assessment reports. The analysis is approached as a mixture of a country-by-country and institution-by-institution comparison, identifying cross-cutting issues. The regional overview draws primarily from the national assessments, supplemented by secondary sources from Transparency International and other organisations.

ANTI-CORRUPTION REFORM

Anti-corruption efforts in the Western Balkans and Türkiye reveal a mixed picture, with some countries (**Kosovo** and **Albania**) demonstrating justice reforms, adopting laws to meet EU integration criteria and launching new national anti-corruption strategies (**North Macedonia**), while others show no progress in adopting necessary anti-corruption legislation and strategies (**Bosnia and Herzegovina**), slow or insufficient amendment of laws (**Montenegro**), legal amendments without proper civil society consultation and creating new loopholes (**Serbia**) or complete lack of reform and withdrawal from multilateral initiatives (**Türkiye**), in light of broader democratic decline.

- In **Albania**, significant justice reforms, including constitutional amendments, led to the establishment of new judicial institutions, such as the Special Anti-Corruption and Organised Crime Structure and the National Bureau of Investigation. The High Judicial Council underwent changes to introduce a more transparent and merit-based selection of judges and prosecutors. The vetting process by the Independent Qualification Commission aimed at ensuring integrity and competence, but also resulted in a shortage of human resources in the justice sector due to dismissals. Compliance with the OECD Convention on Combatting Bribery of Foreign Public Officials remains incomplete. Legislature approval is pending for a new law on preventing conflicts of interest, supported since 2021 by the High Inspectorate of Declaration and Audit of Assets and Conflict of Interests, which is analysed as an anti-corruption agency in the NIS assessment. Necessary reforms on political parties and campaign finances recommended by OSCE-ODHIR and the European Commission have not been adopted. Further challenges include limited scrutiny of implementation and post-implementation of laws, and weak public trust in anti-corruption efforts. The Inter-sectoral Strategy against Corruption 2015-2020 and its action plan were extended until 2023, with

preparations underway for a new strategy covering 2023-2030. A draft text of the strategy is available, but has not yet been approved, by the executive.²¹

- In 2022, a new commission addressing corruption and kleptocracy was established within the Parliamentary Assembly of **Bosnia and Herzegovina**. However, during the 2018-2022 legislative term, only the Public Procurement Law was adopted in terms of relevant anti-corruption legislation, and most of the 14 priorities from the EU Membership Application Opinion remain unfulfilled or only partially addressed. Key laws, which are part of these priorities, such as the Law on Conflict of Interest and the Law on the High Judicial and Prosecutorial Council, were not adopted, although amendments to the latter were made in 2023, and additional amendments were adopted in January 2024. The entity-level Federation of Bosnia and Herzegovina did not adopt the necessary law on whistleblower protection, nor did it amend the law on conflict of interest or adopt a new one that would designate a body in charge of its enforcement. The state-level anti-corruption strategy expired in 2019 without replacement, and an overview of the 2015-2019 Strategy for the Fight against Corruption revealed that less than a third of the strategy's measures had been implemented. Entity-level strategies also expired without replacement.²²

- In **Kosovo**, significant efforts have been made to combat corruption, mainly driven by EU integration criteria. Following the adoption of key legislation in 2017-2018, including laws mandating the suspension or removal of public officials implicated in corruption, the government initiated further reforms in 2021 and 2022, through constitutional amendments to implement additional integrity checks for senior judges and prosecutors. Further efforts addressed political party financing, the establishment of a bureau for asset confiscation, drafting and approval of the new Law for the Agency for the Prevention of Corruption, and asset

declaration laws. However, the approved reforms on the Prosecutorial Council were challenged by opposition parties in the Constitutional Court, which deemed it unconstitutional. New amendments are underway, which seek to address the Court's ruling and the opinions of the Venice Commission, an advisory body of the Council of Europe, composed of independent experts in the field of constitutional law. Despite a comprehensive legal framework, challenges persist in practical implementation, including delays in high-profile corruption cases, lack of money laundering investigations, and limited progress in investigating and confiscating unjustified assets.²³

- Since the change of government in **Montenegro** in 2020, there has been limited progress in adopting anti-corruption legislation, despite the country ratifying major international conventions. Controversial changes to the Law on the State Prosecutor's Office faced criticism for increasing political influence over prosecution. However, these changes also led to the appointment of a new Special Prosecutor initiating high-level corruption investigations. There are a number of laws and amendments that were not finalised by the executive or not reviewed and adopted by Parliament in the previous period. This included amendments to the Law on Free Access to Information, the Law on Prevention of Corruption, the Law on Financing Political Parties and Election Campaigns, the Law on Confiscation of Assets from Criminal Activities, the Law on Illicit Enrichment, the Law on Spatial Planning and Development, the Law on Public Procurement, and other legislation in areas prone to corruption. A significant political crisis in 2022-2023 and the lack of political will among the new parties in power hindered anti-corruption reforms. There is currently no national anti-corruption strategy, despite announcements in 2020 on the intention to develop one for 2023-2026.²⁴

- In **North Macedonia**, the Law on Prevention of Corruption and Conflict of Interest, enacted in 2019, introduced a new and transparent procedure for the selection of the president and six commissioners of the anti-corruption agency. These are selected and appointed by Parliament, in an open procedure that includes CSOs, the media and independent bodies, such as the ombudsperson. The open panel interview allows CSOs and the media to participate and ask questions, and all selection interviews are aired on the Assembly TV channel. However, further

necessary amendments to the Law on Prevention of Corruption and Conflict of Interest have not been completed as planned by the Ministry of Justice in 2021. These include introducing clear provisions to determine the procedures within the competencies of the anti-corruption agency, and broadening the scope of persons whose asset declarations can be subject to review, and of measures that can be imposed for violations of the Law on Prevention of Corruption and Conflict of Interest, as well as clarifying the ambiguity of certain provisions and terms. However, there was progress in the Law on Protection of Whistleblowers, with the working group created by the Minister of Justice completing its task in December 2023. In July 2023, the government established an interdepartmental body to coordinate anti-corruption efforts, provide technical support, implement measures, and collect data for monitoring and reporting to international organisations. Although the Assembly adopted the National Strategy for Corruption Prevention (2021-2025), its implementation remained limited to 10 per cent in the first two years, according to the latest 2023 assessment. In January 2022, the government created a new position of deputy prime minister, responsible for good governance policies.²⁵

- **Serbia's** Parliament has adopted several anti-corruption laws during the last five years, including the Law on Lobbying, the Law on Prevention of Corruption, the Law on the Financing of Political Activities, and amendments to the Law on Free Access to Information. However, the reforms did not properly address key integrity concerns and were enacted without proper public debate or input from civil society and experts, who raised concerns about the laws' content, and their lack of involvement. Despite multiple revisions, the amendments to the Law on Prevention of Corruption have not fully addressed perceived shortcomings. The government and Parliament also failed to address issues raised by the GRECO Fifth round evaluation report, ODIHR and the Venice Commission's 2022 recommendations related to elections, and some of the European Commission (EC) progress report recommendations. Parliament also adopted several acts that seriously undermine the corruption prevention system, such as the special laws for infrastructure projects. There has been no anti-corruption strategy since the end of 2018, while the national branch of the Global Organisation of Parliamentarians Against Corruption has been inactive since 2021. There have also been no decisions in cases of alleged violation of the Code of

Conduct for Members of Parliament (MPs) since 2021.²⁶

● In the last five years, **Türkiye** has not enacted any anti-corruption legislation or reform measures. There is no current national anti-corruption strategy or action plan, with the last known strategy expiring in 2014. Although Türkiye signed the United Nations Convention against Corruption (UNCAC) in 2006, there have been no notable communiques or initiatives highlighting specific anti-corruption efforts since the country's change to a presidential system in 2017. Türkiye has also withdrawn its willing participation in the fight against corruption, illustrated by its leaving the Open Government Partnership in 2017.²⁷

SEPARATION OF POWERS

The division of power between the executive and legislative branches of government and the judiciary is crucial for ensuring a system of political checks and balances, including oversight of the executive to prevent abuses of power. However, the Western Balkans countries and Türkiye display a concentration of power that enables executive dominance, especially through the head of state or government – who is usually also the leader of the majority political party in parliament. This has led to challenges in the adoption of laws initiated by the legislature and a lack of legislative independence, which limits parliamentary oversight of the executive. Despite similarities between countries, the extent and form of such challenges vary, partly due to differences in political systems. This is particularly the case in **Türkiye**, which switched to a presidential system of government in 2017. While **Bosnia and Herzegovina** has a highly decentralised, combined parliamentary and presidential political system, other countries in the region have parliamentary systems. Despite this, most of them have, or have had, some form of “strongman” political leader. Strongmen paint themselves as stabilising forces, especially during crises. However, their governance undermines structural stability and institutional strength. Their rule is characterised by political interference in the judiciary, control of state institutions, patronage – often through political recruitment, and impunity for themselves and their clientelist network (see subsequent chapters on the justice sector, the public sector and oversight institutions).²⁸ Such strongmen are enabled by a lack of internal party democracy, election integrity and political integrity in general.

STRONGMAN POLITICAL LEADERS

For a decade or more, most countries in the Western Balkan and Türkiye had “strongman” political leaders in power. In **Serbia**, Aleksandar

Vučić was prime minister from 2014 to 2017 and has been president since 2017. In **Albania**, Edi Rama has been prime minister since 2013 and in **Türkiye**, Recep Tayyip Erdoğan has been president since 2014, having been prime minister from 2003 to 2014. **Bosnia and Herzegovina** is marked by notably influential figures such as the leader of the Croatian Democratic Union, Dragan Čović, who has positioned himself as the leader of the country’s Croats for more than 20 years. At state and entity level, Milorad Dodik is the current president of Republika Srpska, and has held state presidential and prime ministerial positions since 2006, despite serious corruption allegations against him and sanctions imposed against him by the United States.

In contrast, **Montenegro** has seen a rollercoaster of political transformation, after the prolonged rule of Milo Đukanović, who juggled the roles of president and prime minister for over three decades. However, this change was followed by a period of political turbulence, marked by the emergence of three different governments in as many years, culminating in the latest electoral showdown in October 2023. In **North Macedonia**, there has been no strong leader in the last eight years, along with a lack of substantial reforms. **Kosovo** has experienced frequent changes in its executive leadership, marked by governments led by different parties, contributing to a healthier democracy. Even though frequent changes meant governments often did not serve their full terms, those changes were necessary to solve political crises of the period.

LACK OF PARLIAMENTARY CONTROL AND SUPPORT FOR OVERSIGHT

In all countries in the Western Balkans and Türkiye, the gap between legally prescribed oversight mechanisms and practical enforcement persists, raising concerns about the strength of democratic checks and balances in the region. Mechanisms for

parliamentary oversight of the executive are in place, such as written questions, interpellations, motions for debate, and committees of inquiry. However, they are infrequently used across the region. For example, **Serbia** held no parliamentary question sessions between August 2022 and April 2023. In **Kosovo**, most questions lack quality and are skewed in favour of the executive. In **North Macedonia**, there was a complete lack of parliamentary inquiries in 2021 and of information on inquiries in subsequent years in reports issued by Parliament. In **Türkiye**, parliamentarians can submit questions, but only to the vice president or to ministers, not the president.²⁹

The main problem in most countries in the Western Balkans and Türkiye is that the executive dominates the legislative branch. In **Bosnia and Herzegovina**, for example, this is evident in cases where the parliament did not adopt reports by oversight institutions, meaning executive office holders were not held accountable. **Serbia's** Parliament also fails to hold timely discussions on reports and recommendations by oversight institutions. Conclusions do not usually include deadlines or specific tasks for the executive, limiting the effects of parliamentary oversight.³⁰

In **Serbia** and **Kosovo** inquiry committees were interrupted by early elections or are hindered by the ruling party abstaining, resulting in insufficient attendees for a quorum. In **Albania**, the main opposition party struggles with internal factions, hampering its ability to exercise executive control.³¹

In **Albania**, **Bosnia and Herzegovina**, **Serbia** and **Türkiye**, laws are proposed by the executive and passed in plenary sessions without proper parliamentary scrutiny and discussion. In **Montenegro**, the Abazović government stayed in power for more than a year after losing a no-confidence vote in August 2022, and passed important legislation that went beyond its technical mandate at the time. Parliament had exercised active control over the previous government, but lacked scrutiny over the Abazović administration. In **Türkiye**, control of laws by the legislative is limited, due to its inability to scrutinise presidential decrees, which are regularly enacted.³²

GENDER EQUALITY IN THE EXECUTIVE AND LEGISLATURE

While women are intrinsically no less corrupt than men, some scholars argue that due to their social roles, women are more aware of the impact of corruption on key services such as health and education, and therefore more likely to refrain from corruption when they participate in political life.³³ Gender representation in the executive and legislature remains insufficient in almost all Western Balkans countries and Türkiye (see Graphic 4.1). In terms of heads of state, only one of the three presidents³⁴ and the chair of the Council of Ministers of **Bosnia and Herzegovina**, the president of **Kosovo** and the prime minister of **Serbia** are women. In **Albania**, most ministries are led by women – the only country in the region where this is the case. In **Kosovo**, the Constitutional Court ruled that male parliamentary candidates with more votes in the 2019 elections were discriminated against when denied positions that would replace women MPs, arguing that replacements should reflect the overall outcome of voting, and not be limited to the same gender, as long as the minimum gender representation is maintained.³⁵

There are some positive examples in terms of parliamentary representation. In **Albania**, the current speaker of the Assembly is a woman, and gender representation in legislative leadership roles, such as the Bureau of the Assembly and leading parliamentary committees, is balanced. In **Kosovo**, eight of 14 the committees are currently led by women. In the last legislature, Vjosa Osmani became the first woman speaker, and in the current term, Saranda Bogujevci is the first woman deputy speaker. However, gender bias persists in parliamentary committees, with women usually only leading committees linked to traditional female roles, such as social welfare, health and education, on which they are overrepresented, while being underrepresented on committees focused on economic and security issues.³⁶

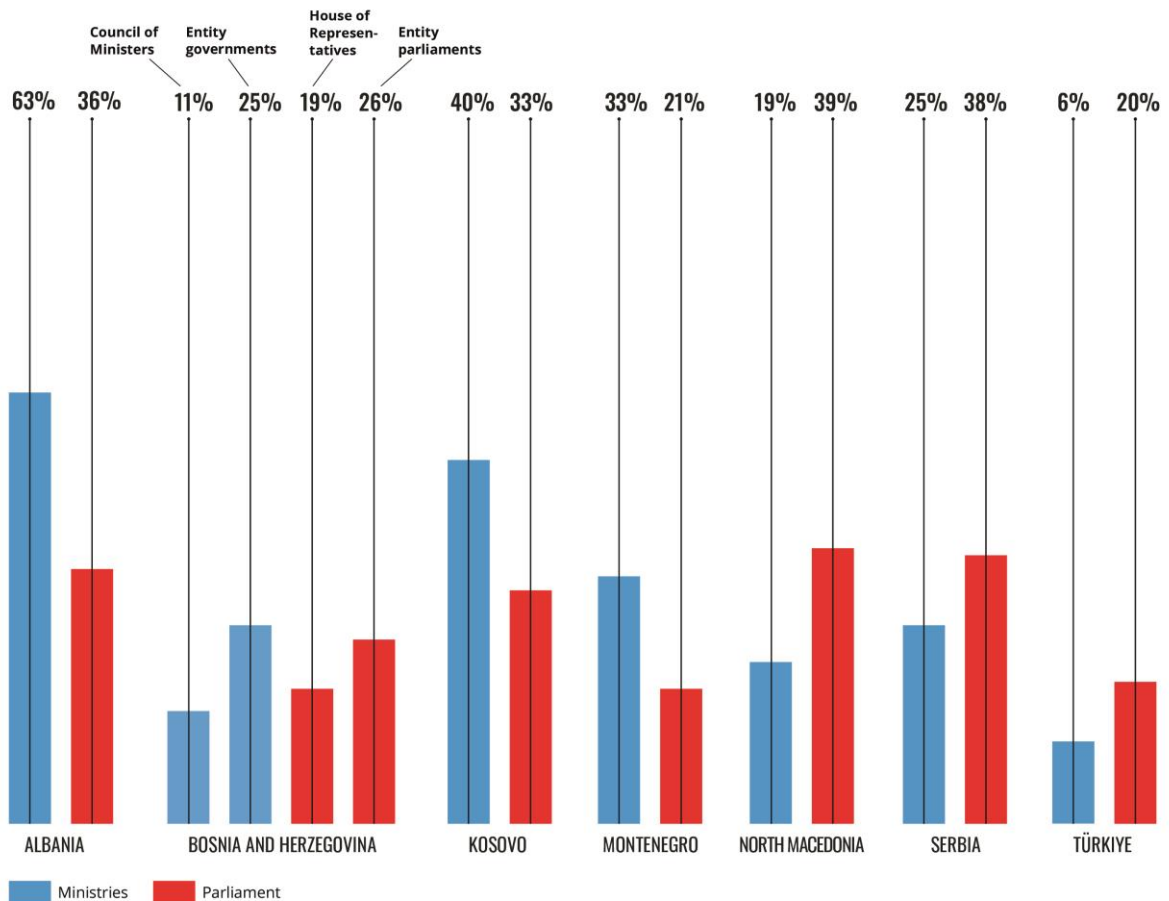
In **Bosnia and Herzegovina**, in the current term of the House of Representatives of the Federation of Bosnia and Herzegovina both the speaker and one

deputy are women, a change from previous terms, where women were not represented in leadership roles. In the Republika Srpska parliament, no woman has been elected as a speaker in the last three terms. In the previous term, two out of four deputy speakers were women, and in the current term, only one out of three elected deputy speakers is a woman. In **North Macedonia**, the president and the Secretary-General of the Government is a woman.³⁷

Only two women have served as presidents of **Montenegro's** Parliament (in 2001-2002 and 2022-

2023), and from time to time, one of the three deputy presidents has been a woman. Since 1990, only four women in **Serbia** have served as the speaker of the National Assembly, in 2001-2004, 2008-2012, 2014-2020, and since 2024, in contrast to 11 men.³⁸ In **Türkiye**, after the May 2023 elections, the percentage of women in parliament reached its highest level in history, at 20 per cent, but still remains low. Only one of the 15 parliamentary committees – the Petition Commission – is led by a woman.³⁹

Graphic 4.1: Overview of percentage of women in executive and legislative bodies in the Western Balkans and Türkiye⁴⁰



RECOMMENDATIONS TO STRENGTHEN THE SEPARATION OF POWER BETWEEN EXECUTIVE AND LEGISLATIVE

To national parliaments

- + **Parliamentary oversight:** Increase the proactive use of parliamentary oversight mechanisms, such as written questions, interpellations and committees of inquiry, making them more effective tools for holding the executive accountable.
WHO *All countries.*
- + **Public participation:** Make the process of adopting laws more transparent and ensure meaningful participation of experts and civil society, through a full drafting and public discussion process, instead of fast-tracking political procedures behind closed doors.
WHO *All countries.*

JUSTICE SECTOR

In the Western Balkans and Türkiye, the justice sector, including law enforcement, grapples with insufficient financial, human and technical resources, contributing to a backlog of cases. The fair administration of investigations and justice can be undermined by a lack of independence, prevalent in political appointments, transfers and dismissals, and weak implementation of disciplinary mechanisms. These shortcomings result in relatively low levels of effective prosecutions for corruption, especially high-level corruption.

The national integrity assessments found that the judiciary and prosecution services across the region are strongest in **Albania** and **Kosovo**, with rising levels of effectiveness. At the bottom, **Türkiye's** justice system is experiencing further decline. **Bosnia and Herzegovina** and **Montenegro** also show low levels of judicial effectiveness, due to resource gaps and lack of independence. Despite reforms, **North Macedonia** and **Serbia** demonstrate medium-level strength in the judiciary and a lack of effectiveness and independence in prosecution services.

In terms of law enforcement, **Kosovo** again leads across the region, followed by **North Macedonia**, **Serbia**, **Albania** and **Bosnia and Herzegovina**. The weakest law enforcement agencies in terms of their role within the national integrity system and in investigating corruption were observed in **Montenegro** and **Türkiye**.

RESOURCES

All countries in the Western Balkans and Türkiye lack sufficient financial resources for the judiciary and public prosecution. **Kosovo's** judiciary is the exception, even though its budgetary requirements are not fully approved by the government. In contrast, lack of resources is especially problematic in **Montenegro**, resulting in lengthy trials and the release from custody of nearly 1,000 people arrested for organised crime and other serious offences.⁴¹ In **Albania**, the gap in human resources in the judiciary and prosecution services is linked to a high number of dismissals in the vetting process. The police force suffers from under-financing, high turnover rates, and lack of experience and technical capacities for corruption investigations. Law enforcement in **Albania**, **Bosnia and Herzegovina** and **Montenegro** suffers gaps in funding and the number of police officers. In **Türkiye**, mass dismissals after the coup attempt in 2016 led to rushed hiring processes for judges and prosecutors, who were likely to be insufficiently trained. In **Bosnia and Herzegovina**, despite an increase in funding, more than 10 per cent of judges' positions and 15 per cent of prosecutors' positions remained consistently unfilled in 2022. Even though budget and salary increases have taken place in law enforcement, the sector has operated since 2021 via short-term decisions on temporary financing, due to the budget not being adopted in time – a process which enables financing only of basic needs.⁴²

Table 5.1: Overview of scores for resource (in practice) indicators of national integrity assessments⁴³

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Judiciary	●	●	●	●	●	●	●
Public prosecution	●	●	●	●	●	●	●
Law enforcement	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

Kosovo provides relatively good levels of financial and human resources for both the judiciary and law enforcement, but gaps in resources persist, with judicial budget requests not being fully approved and resignation of police officers from the ethnic Serb minority leading to some human resource gaps. The public prosecution service faces gaps in financial resources that lead to a lack of human resources and prevent new recruitment. **North Macedonia** and **Serbia** have relatively well-resourced law enforcement agencies. Even though the judiciary and prosecution in **Serbia** has sufficient financial resources, it operates with a relatively high number of vacant positions. In **North Macedonia**, the judicial budget has been constantly reduced and has not attained the legal minimum budget of 0.8 per cent of GDP, while the prosecution budget has not reached the legally prescribed minimum of 0.4 per cent of the state budget. Over half of public prosecutor positions are not filled.⁴⁴

INDEPENDENCE

There is a widespread lack of judicial independence across the region, especially affecting the appointment process. This is especially severe in **Bosnia and Herzegovina**, **Montenegro** and **Türkiye** across the judiciary, prosecution services and law enforcement. **North Macedonia** has low levels of independence in the judiciary and public prosecution, but has independent law enforcement agencies. **Serbia** displays low independence in the prosecution services and law enforcement, and medium-level independence in the judiciary. **Albania** and **Kosovo** also show some level of vulnerability to political influence, with **Kosovo** showing the highest independence across all three institutions – but still only at a medium level.⁴⁵

In **Bosnia and Herzegovina**, appointments to the judiciary, prosecution and police force show, as the OSCE states in a 2020 report, an “alarming and unexplained inclination towards the principle of ethnic representativeness over competence”, making these processes vulnerable to political and personal gain. In **Montenegro**, legislative changes appointing new members to the Prosecutorial Council with a simple parliamentary majority were criticised by the Venice Commission for vulnerability to political influence. In terms of the police force, further concerns exist about political influence and infiltration by organised crime. This includes elite police officials working for criminal clans to harm other clans by abducting their members. In **Türkiye**, there is also a high level of influence on appointments and transfers – for example, as in the case of a prosecutor who chose not to prosecute the brother of the Deputy Minister of the Interior and was appointed as an inspector for the Council of Judges and Prosecutors just three months later.⁴⁶ A 2021 report compiled by police officers and shared anonymously with select journalists exposed issues such as favouritism, political appointments and promotions based on political affiliation.⁴⁷

In contrast, **North Macedonia** generally experiences low levels of political interference in the police, although recent appointments have faced criticism from the anti-corruption agency for potentially being influenced by the ruling party. Despite reform efforts in the judiciary and prosecution, the selection of the chief prosecutor of the Basic Public Prosecutor's Office for Organised Crime and Corruption in November 2022 was criticised for a lack of transparency and alleged political influence.⁴⁸

Table 5.2: Overview of scores for independence (in practice) indicators of national integrity assessments⁴⁹

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Judiciary	●	●	●	●	●	●	●
Public prosecution	●	●	●	●	●	●	●
Law enforcement	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

In **Serbia**, the independence of the Prosecutor’s Office is threatened by hierarchical powers and perceived self-censorship among public prosecutors. In 2023, two prosecutors from the Special Department for Suppression of Corruption were reassigned on the basis of “changes in the annual work assignment plan” after arresting suspects in a major corruption case at the state-owned enterprise Elektroprivreda.⁵⁰ The judiciary faces political pressure and attacks from Serbia’s President. Similarly, in **Albania**, politicians including ministers, the prime minister and the leader of the opposition have made offensive and intimidating verbal attacks in public against judges, based on their rulings. In terms of law enforcement, there is an unclear career progression path due to lack of transparent and merit-based criteria for appointments and promotions. In **Serbia**, there are allegations of top elected officials influencing criminal investigations by the police for political purposes – for example, during an investigation into

the demolition of buildings in the Savamala district of Belgrade,⁵¹ allegedly linked to the controversial property development project Belgrade Waterfront.⁵²

ACCOUNTABILITY AND OVERSIGHT

Ostensibly independent councils provide oversight of the judiciary and prosecution services in the Western Balkans and Türkiye. These can be either separate for the judiciary and prosecution services (**Albania, Kosovo, Montenegro, North Macedonia and Serbia**) or combined in one council (**Bosnia and Herzegovina and Türkiye**). Police oversight is provided by a mix of internal control mechanisms and external oversight through parliament, the ombudsperson and some form of special oversight body.⁵³

Table 5.3: Overview of scores for accountability (in practice) indicators of national integrity assessments⁵⁴

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Judiciary	●	●	●	●	●	●	●
Public prosecution	●	●	●	●	●	●	●
Law enforcement	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

Accountability regarding judges is strongest in **Albania** and **Serbia**, and in **Kosovo**, regarding public prosecutors and police officers. In **Bosnia and Herzegovina, Montenegro, Serbia and Türkiye**, the lack of independence results in deficiencies in accountability mechanisms. This is also the case in **North Macedonia** for both judges and prosecutors, although police officers are usually held to account.⁵⁵

However, even in **Kosovo**, the disciplinary mechanism has been criticised for leniency, rarely proposing the dismissal of prosecutors and rejecting a high number of complaints. In the police force, an increase in complaints and investigations by the Police Inspectorate shows deterioration of behaviour, but also increased control. Regarding judges, the council is more likely to act when cases raise public pressure.⁵⁶

The High Judicial Council in **Albania** struggles with human resources, due to lack of incentives for judges to apply for secondment. However, it remains relatively effective and implements strict

sanctions, such as dismissals. The integrity vetting process has increased the accountability of judges and prosecutors, and exposed serious cases of misconduct, such as concealment of the true source of assets, false statements, and insufficient declaration of assets. This improvement highlights the previous lack of proper oversight by the anti-corruption agency. There have also been controversies in the vetting process, with some judges dismissed for minor breaches and others confirmed despite evidence of improper contacts or unexplained assets, as was the case for the former judge of the Administrative Court of Appeal. In addition, the police oversight agency responds slowly to complaints, and carries out low numbers of investigations and inspections.⁵⁷

In **Bosnia and Herzegovina**, disciplinary proceedings against judges and prosecutors have not had deterrent effects. When disciplinary measures are enforced, more than half are token salary reductions. Members of the judiciary have not been investigated or disciplined for dubious court rulings – allegedly including arrangements to reduce

sentences or drop investigations for high-level drug smugglers. Independent police oversight is limited to having a mandate only to log, refer and oversee the handling of complaints. Investigations into alleged misconduct by the police agency are carried out by the Internal Control Department/Professional Standards Unit. This means that employees within police agencies are responsible for investigating complaints against their colleagues, raising the risk of deliberate or subconscious bias in investigations.⁵⁸

In **Montenegro**, the judiciary is not committed to sanctioning corruption and its progress in this area remains very limited. Widespread use of plea agreements with sanctions below the statutory minimum is further hindering results. Citizens believe that corruption within the judiciary represents one of the key obstacles to successful prosecutions. Recent arrests of top-level judicial officials for corruption and organised crime offences confirm such impressions. Impunity in the police force has long been a problem. Only since 2023 have cases against high-level police officials been initiated for cooperation with organised crime and torture.⁵⁹

In **Serbia**, disciplinary mechanisms are strongest in terms of the judiciary, but complaints to the managers of public prosecutors are often rejected as unfounded, making accountability mechanisms ineffective. In August 2022, MPs proposed the establishment of committees of inquiry related to several cases involving the police, but this has still not been included on the parliamentary agenda.⁶⁰

In **Türkiye**, an increasing number of judicial decisions given without reasoning, combined with limited review of decisions, raise doubts about the effectiveness of accountability mechanisms.

Accountability in the police force is limited by the obligation that the prosecutor's office receives permission from the police force's administrative superiors to investigate police officers. Police officers are rarely held accountable, even in instances of attacks on journalists.⁶¹

In **North Macedonia**, the judiciary and prosecution services lack effective accountability, as evidenced by the high number of citizen complaints, low number of reviewed cases, and lack of proper sanctioning – especially in cases where judges fail to provide their reasoning. Following the conviction and imprisonment of the former chief prosecutor of the Basic Public Prosecutor's Office for Organised Crime and Corruption for abuse of office, the subsequent chief prosecutor faced suspension in 2022 over criminal charges filed by the financial police.⁶²

EFFECTIVENESS IN PROSECUTING HIGH-LEVEL CORRUPTION

Despite a few cases and attempts to prosecute high-level corruption across the region, effectiveness in this area is limited due to decreasing numbers of indictments (**Montenegro**), prolonged court proceedings that risk cases becoming obsolete through statutes of limitations (**North Macedonia**) and lenient sanctioning (**Bosnia and Herzegovina**). More recent efforts in **Albania** and **Kosovo** involve ongoing court procedures, so the effectiveness of the prosecution is not yet known. In **Serbia** and **Türkiye**, limited data availability makes it difficult to evaluate effectiveness, but instances of acquittals or failure to prosecute indicate deep levels of impunity.⁶³

Table 5.4: Overview of scores for corruption prosecution indicators of national integrity assessments⁶⁴

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Judiciary	●	●	●	●	●	●	●
Public prosecution	●	●	●	●	●	●	●
Law enforcement	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

In **Albania**, the judiciary is actively engaged in bringing corruption cases involving public officials to court. Notable cases in 2023 include charges against the former president and prime minister, the former deputy prime minister and other high-ranking individuals. However, most high-profile trials are still ongoing, preventing assessment of whether these efforts are successful. Delays occur for various reasons, including the complexity of the cases, procedural “tricks” and, sometimes, political interference. A small increase in the number of money laundering cases is mostly due to the Special Anti-Corruption Structure initiating proceedings, rather than the general prosecution service, meaning money laundering remains largely unprosecuted.⁶⁵

A survey conducted by Transparency International **Bosnia and Herzegovina** revealed an increase in convictions for corruption-related offences in 2022, compared to the previous year. However, punitive actions for such offences are considered lenient, with 62.5 per cent of convictions resulting in conditional sentences and only 34.6 per cent leading to prison sentences. Of 293 convictions in 2022, only eight were related to cases of grand corruption. This limited number of convictions could indicate the challenges judicial actors face in addressing impunity, such as political influence and control over the judiciary, or self-censorship.⁶⁶

The judiciary in **Kosovo** expresses commitment to combatting corruption, but faces challenges, including a lenient sanctions policy for high-profile corruption cases. There are few final court decisions and asset confiscation rulings against officials accused of corruption. Despite the Joint Commitment Statement (on existing mechanisms of integrity and accountability within the justice sector) between the Kosovo Judicial Council, the Kosovo Prosecutorial Council and the Ministry of Justice, the councils still refuse to cooperate with the ministry on vetting process reforms, citing constitutional concerns.⁶⁷

In **Montenegro**, legal changes and the appointment of a new Special Prosecutor have spurred investigations into high-level corruption, particularly related to the criminal use of the Sky ECC communication service tool, after investigators in Belgium, France and the Netherlands successfully unlocked the criminals’ encryption and monitored their use of the service.⁶⁸ This included cases involving the ex-President of the Supreme Court and ex-Director of the Police Department.⁶⁹ Despite these efforts, reports suggest limited success in combatting corruption and money laundering,

reflected in decreasing numbers of indictments and convictions in recent years.⁷⁰

North Macedonia faces challenges, with prolonged procedures in court. The Skopje Court of Appeals overturned the verdict in the significant “Target-Fortress” case of alleged widespread and unauthorised wiretapping of phone conversations of numerous public figures, politicians and journalists, requiring a retrial before early 2025 to avoid obsolescence. One year before the appeal court’s decision, the court of first instance found the former secret police chief guilty, sentencing him to 12 years’ imprisonment. In 2021, 14 defendants in the so-called “Titanic” election fraud case, accused by the Special Prosecutor’s Office of belonging to a criminal network, had escaped prosecution due to the statute of limitations. Similarly, in April 2023, another case related to electoral fraud, “Titanic 2”, also became obsolete. These cases were dismissed due to changes in the criminal code, which shortened the timeframe for prosecution.⁷¹

In **Serbia**, a corruption case involving the former director of Serbian Railways saw a first-instance verdict in April 2013, but subsequent legal proceedings led to an acquittal in March 2019 and a final acquittal by the Court of Appeal in Belgrade in 2021.⁷² In 2021, Serbian courts handled 2,283 corruption cases, resulting in fewer convictions compared to previous years. Most convictions were for abuse of office, with sentences including suspended sentences and house arrest. Financial investigations into 305 people were initiated in 2021, an increase from the previous year. The Supreme Court’s adoption of new reporting practices limits comparative analysis for 2022.⁷³

In **Türkiye**, there are no statistics on “criminal acts of corruption” and “high-level corruption”, undermining evaluation of the judiciary’s commitment to fighting such corruption. Concerns persist over transparency and fairness in corruption and money laundering investigations, with potential issues of partiality, political interference and a lack of proactive initiatives. For example, the former trade minister was accused of selling disinfectants from her own company to her ministry and was dismissed in 2021.⁷⁴ However, the Prosecutor’s Office failed to pursue the case, stating that investigation of duty-related actions falls under the investigative scope of the legislature. A study by Transparency International Türkiye noted an increase in decisions not to prosecute from 2009 to 2021.⁷⁵

GENDER-SENSITIVITY IN INVESTIGATION AND COMPLAINTS MECHANISMS

There is a wide lack of gender sensitive protocols and guidelines across the Western Balkans and Türkiye.⁷⁶ Gender-sensitive protocols in criminal investigations aim to ensure that investigations consider and address the specific needs and experiences of individuals based on their gender – especially in cases involving corruption and gender-based violence, i.e. sextortion.⁷⁷ In **Bosnia and Herzegovina**, while the Policewomen’s Network has provided manuals on gender equality and harassment, they are not mandatory policies.⁷⁸

Gender disaggregated statistics from complaint mechanisms are not available across countries and justice institutions. Such data would allow identification of patterns specific to gender-based complaints, and monitoring of how men and women are treated within complaint mechanisms, highlighting biases or disparities in the process.⁷⁹

There is also a lack of training on gender sensitivity, despite initial efforts across countries. The prosecution service in **North Macedonia** offers training and awareness materials to prosecutors and staff, to enhance implementation of gender-sensitive prosecution. In **Serbia**, the Judicial Academy’s training programme includes one-day sessions on anti-discrimination legislation for various judicial roles. The **Türkiye** Justice Academy and similar institutions organise training for judges and prosecutors on offences such as sexual assault, abuse and harassment, but nothing specially for gender equality. The National Police and international organisations conduct training sessions to enhance police capacity and awareness on gender and violence against women. However, the number of sessions and personnel trained is insufficient, and the focus solely on violence against women is considered a limited approach to gender sensitivity in investigative mechanisms.⁸⁰

RECOMMENDATIONS TO STRENGTHEN THE JUSTICE AND LAW ENFORCEMENT SECTOR

To national governments

- + **Resources:** Provide more financial and human resources to:
 - Judiciary
WHO *Albania, Bosnia and Herzegovina, North Macedonia and Türkiye.*
 - Public prosecution services
WHO *Albania and Bosnia and Herzegovina.*
 - Law enforcement agencies
WHO *Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Türkiye.*
- + **Independence:** Establish objective, transparent and merit-based systems for the appointment, transferral and dismissal of judges and prosecutors.
WHO *All countries.*
- + **Independence:** Limit the discretionary powers of chief prosecutors, and increase the capacity of prosecutors to handle complex corruption cases, especially for special prosecution units working on corruption and money-laundering cases.
WHO *All countries.*
- + **Accountability:** Improve independent and transparent disciplinary proceedings in the judiciary, prosecution services and law enforcement by establishing proportionate sanctions that provide effective deterrence.
WHO *All countries.*
- + **Accountability:** Implement integrity-vetting processes for judges and public prosecution, building on the experience and learning from similar processes in Albania and Kosovo. Independent vetting of all judicial and prosecutorial office holders, including on high judicial and prosecutorial councils, should involve civil society organisations and be open to public and media scrutiny.
WHO *Bosnia and Herzegovina, Montenegro, North Macedonia, Serbia and Türkiye.*

To the justice sector

- + **Accountability:** Improve independent and transparent disciplinary proceedings in the judiciary, prosecution services and law enforcement by making positions in judicial and prosecutorial councils more attractive, and providing sufficient resources and capacity building to such bodies. Enforce proportionate sanctions that provide effective deterrence. Publish relevant information in cases where sanctions are applied.
WHO *All countries.*
- + **Accountability:** Reduce politicisation of the police and strengthen their professionalisation, including through the application of strict sanctions against police officers who promote the interests and activities of political parties, their members and political leaders, or who are involved in organised crime.
WHO *All countries.*
- + **Effectiveness:** Minimise delays in the investigation and prosecution of corruption cases, provide clear justifications for decisions not to prosecute, and extend the statute of limitations for corruption-related crimes.
WHO *All countries.*
- + **Effectiveness:** Significantly strengthen cooperation between bodies responsible for investigating and prosecuting corruption, and improve the quality and sharing of information and data regarding the prosecution of corruption offences.
WHO *All countries.*
- + **Transparency:** The police, prosecutors and courts should collaborate in preparing comprehensive quarterly statistical overviews of corruption and money laundering cases, and publishing them on an official website in open-data format. These overviews should contain key data on the number of corruption cases against public officials (categorised by position), separated by type of criminal offence, type of sentence imposed, and dates for key steps in the investigation and prosecution

process, allowing for analysis to assess efficiency.

WHO *All countries.*

- + **Gender mainstreaming:** Implement comprehensive and standardised gender-sensitive protocols and guidelines across all investigations, and ensure the publication of gender-disaggregated data on all complaint mechanisms linked to the work of the judiciary, prosecution services and law enforcement. This data should be centrally collected by judicial and prosecutorial councils, as well as the relevant oversight body for law enforcement, and published annually in the relevant annual report. The data should include, at the very least, processing times divided by gender, outcomes, and the reasons why a complaint was dismissed.
WHO *All countries.*
- + **Gender Mainstreaming:** Modify judicial statistics systems so they start capturing sextortion cases as a specific category. Implement legal training programmes on gender sensitivity in investigation and prosecution procedures, especially regarding sextortion. Such sessions should cover both the existence and prevalence of sextortion, and the opportunities offered by a country's existing laws to prosecute such cases.
WHO *All countries.*

POLITICAL INTEGRITY

Across the region, there are deficiencies in various areas of political integrity. Loopholes in political finance laws lead to influence of third parties, misuse of state resources and even foreign influence in elections. Electoral management bodies across the region generally have low levels of independence, especially in **Albania, Bosnia and Herzegovina, Kosovo, Montenegro and Türkiye**, leading to a lack of electoral integrity and allegations of vote manipulations, as recently reported by the OSCE election observer mission in **Serbia**. Once politicians are in office, gaps in conflict of interest legislation and enforcement issues enable them to misuse their clientelist networks. There are shortcomings in anti-corruption agencies' verification of asset declarations in most countries, often due to resource constraints or no requirement for verification, as in **Bosnia and Herzegovina and Türkiye**. Most countries in the region do not yet have a lobby register. While **Montenegro, North Macedonia and Serbia** have made efforts to introduce dedicated legislation on lobbying activities, challenges remain in terms of enforcement, transparency and gaps in the laws.

INTERNAL PARTY DEMOCRACY

Political parties across the Western Balkans and Türkiye lack inclusiveness in decision making, with power concentrated within small leadership circles. Despite large memberships, most parties operate as leader-focused clientelist networks, which affects the creation of electoral lists and candidates' placement on them.⁸¹

In the ruling parties in **Bosnia and Herzegovina**, leadership changes are rare, with leaders typically being synonymous with the party or coalition's name. Their executive bodies usually comprise high-level officials from various branches of government and major public-sector entities, wielding significant power which often surpasses that of the party leader. Congresses or party assemblies are

theoretically responsible for electing the president and leadership, as well as for adopting statutes and policy documents. However, in practice, they often lack real power and merely confirm pre-made decisions. The same applies in **Montenegro**, where a report by the Centre for Monitoring suggests that party leaders exert significant influence, making the vast majority of decisions, if not all.⁸²

In **Albania**, there is no limit to the duration of the mandate in the Democratic Party. The Socialist Party leader's mandate is automatically renewed if they win parliamentary elections and remain prime minister, unless the majority of the annual Congress votes for new leadership elections. In practice, the Socialist Party has not contested its leadership since 2009, as the leader has consistently been re-elected Prime Minister. In **North Macedonia**, an assessment by the National Democratic Institute in 2020 highlighted concerns about party leaderships' adherence to party values, respect for membership and accountability to party bodies. Internal procedures within these parties are often seen as mere formalities to endorse decisions made by the leader.⁸³

In **Türkiye**, parties often inflate support through clientelist networks, and lack a politicised mass membership base. The ruling Justice and Development Party (JDP) and its coalition partner, the Nationalist Movement Party, are characterised as rigidly hierarchical and centred around their leadership. Observers note the emergence of "Erdoganism", closely associated with the persona of the JDP leader. Similarly, in **Serbia**, the submissiveness of party officials to their president is demonstrated by a 2023 statement from the vice-president of the ruling party, describing the president as "invincible" and emphasising their reliance on him for leadership and guidance.

The Self-Determination Movement in **Kosovo** stands out for practising direct democracy through the "one member, one vote" principle for electing the party chairman and heads of organisational units,

and approving the political programme. However, recent leadership elections in the party were marked by a lack of competitiveness, with only one candidate running. In **North Macedonia**, the Social Democratic Union of Macedonia held its first direct elections for party president in March 2021. In **Bosnia and Herzegovina**, the Social Democratic Party introduced the principle of “one member, one vote” for electing its president in 2015, but recent statutory changes have undermined this reform.⁸⁴

GENDER REPRESENTATION IN POLITICAL PARTIES

Political parties marked by clientelist networks tend to be dominated by men and lack women in leadership positions.⁸⁵ This is the case throughout the Western Balkans and Türkiye. In **Kosovo**, women lead only four of the 50 political parties currently registered. In **North Macedonia**, only two smaller political parties have women leaders, while no political party is led by a woman in either **Bosnia and Herzegovina** or **Montenegro**. In **Türkiye**, most mainstream political parties in parliament are run by men, and men usually make up the majority in their party committees. However, there are exceptions. For instance, the Good Party is led by a woman and, along with the Republican People's Party, has rules that ensure a certain percentage of women in various parts of the party. Parties with Kurdish roots are also working towards having equal numbers of men and women in leadership roles. The People's Democratic Party has a system where there is both a male and a female leader at different levels, while the Workers' Party of Türkiye has a rule that 40 per cent of all party positions should be held by women. Left-wing parties such as these two have also included openly LGBTQI candidates in their election campaigns.⁸⁶

Political parties in **Serbia** are mandated to adopt action plans with special measures for promoting gender equality every four years, and to prepare reports on the gender composition of management, supervisory and other bodies. However, of 101 political parties, only 11 submitted these reports in 2022 – most of them minority parties. Among them, only a few, such as the Macedonian Party of Serbia and the Rusin Democratic Party, have balanced gender representation in decision-making and supervisory

bodies. In other parties, the proportion of women's participation ranges from 30 to 35 per cent. However, these numbers from the 11 submitted reports may not be representative, due to the absence of reports from major political parties.⁸⁷

Women's forums within parties have little impact on decision-making processes. During election campaigns, gender stereotypes are often used to discredit female candidates, leading to the harassment and marginalisation of women in politics. In **Albania**, for example, women report exclusionary and discriminatory practices, such as questioning their decision-making abilities, removing them from candidate lists, cutting financial support during electoral campaigns, and using hate speech. Research conducted in 2020 in **Serbia** also highlights the existence of various forms of violence against female politicians, with parties lacking internal protection mechanisms against gender-based violence.⁸⁸

POLITICAL FINANCE

Parts of this section have been previously published in a working paper:

Transparency International (2023), Bringing the Receipts, Political Finance Transparency in the Western Balkans and Türkiye⁸⁹

All countries in the Western Balkans and Türkiye require political parties to submit annual financial reports and, with the exception of **Türkiye**, campaign finance reports. Candidates of political parties and third parties are not required to report on their campaign activities and spendings, though in **Albania**, candidates must do so via their political parties. Additionally, there is a lack of regulation for reporting on digital and social media campaigns.⁹⁰

Misuse of state resources

The legislation in some countries fails to protect state resources from misuse in election campaigns. For example, in **Montenegro**, legal changes in 2020 failed to include state-owned enterprises in employment bans during election campaigns. In **Montenegro**, during the presidential and extraordinary parliamentary elections of 2023, state institutions and state-owned enterprises signed more than 12,000 employment contracts. There is a risk that officials will offer employment opportunities in state-owned companies to further

the interests of their clientelist party network, thus misusing state resources. In **Serbia**, legislation does not prevent the widespread practice of public officials conducting promotional activities that are allegedly part of their official functions during an election campaign, nor substantially increased budgetary spending before elections. It is estimated by experts, based on available data, that during the 2023 election campaign, public resources were burdened by extraordinary subsidies to the amount of at least €400 million, distributed to various categories of citizens, with the ultimate purpose of promoting the list gathered around the ruling Serbian Progressive Party.⁹¹ The misuse of state resources by the ruling party has also been regularly noted in **Albania**, and ambiguities in the regulatory framework have not been addressed. For example, before the recent local elections, the government provided social benefits to citizens, distributed bonuses to pensioners and raised the salaries of various categories of public employees. Additionally, it linked future financial assistance for municipalities to the election outcome. There has often been a blurred line between cabinet ministers' official duties and their campaign activities. In **Bosnia and Herzegovina**, amendments to the Election Law in July 2022 included measures to address the misuse of state resources for election campaigns. These changes have resulted in a steady rise in reported instances of abuse of public funds for campaign financing or for indirectly purchasing votes. In **Türkiye**, the announcement of significant social assistance programmes has given the ruling party an unfair advantage and blurred the line between the party and the state.⁹²

Transparency of political finances

In practice, the level of transparency in reporting political finances varies. Donor names are disclosed in all the countries assessed, except for **Türkiye**. Only **Albania** publishes donor unique IDs.

Türkiye is also the only country reviewed not to disclose donation amounts, making only audit reports available to the public. All jurisdictions assessed, apart from **Serbia**⁹³ and **Türkiye**, disclose the date of donations. The date of donations matters, because donations made at different times may fall under either ordinary annual reporting or campaign-period reporting.⁹⁴

Details of individual items of expenditure are available to some extent. In **Albania** and **Montenegro**, they are available only in campaign reports, but not in annual reports, which only give

summaries of categories of individual expenditures. In **Kosovo**, political parties report on individual expenses, but only those above €5,000 are made publicly available. In **Türkiye**, only summary amounts in categories of expenditure are provided. In **Bosnia and Herzegovina**, reporting forms, particularly those related to post-election financial disclosures, are outdated and lack the necessary details and structure to give a thorough understanding of expenses and the ultimate beneficiaries of party funds. For example, the reports currently available do not display individual expenses, nor do they reveal the identities of individuals receiving funds from political parties, or companies offering services to these parties. Even though political parties in **Serbia** report individual expenses, they often fail to do so correctly. For example, in 2022, most parties did not report costs in the correct category, but under "other costs", or failed to provide the names of end-service providers for their billboard campaigns. Providing information on individual expenditure is crucial to ensure that oversight agencies, as well as the media and civil society, can monitor campaigns and clearly understand where the money is going.⁹⁵

Data on assets and liabilities is disclosed in some form by all countries apart from **Türkiye**. Liabilities are of particular interest, as bank loans present a risk of undue influence by banks on political parties. The specific conditions of the loans are not given in any of the seven countries assessed.⁹⁶

Accuracy of political finance data

A lack of accuracy in political finance data is still notable in most countries. Monitoring by Transparency International **Bosnia and Herzegovina** shows that the information in financial reports regarding spending on advertising and online campaigning is often unreliable compared to market value, and that in-kind donations are not reported. The delay in audit reports also impacts the application of timely sanctions for violations of financial rules. In **Kosovo**, auditors consistently highlight widespread issues in political party finances, including inadequate accounting practices, insufficient tendering procedures, non-compliance with tax obligations, lack of internal control measures, and a lack of accounting knowledge among financial officers. The accuracy of reports in **North Macedonia** is also dubious, as alleged by a former member of the anti-corruption agency, who suggests that political parties may be receiving illicit money without transparent disclosure of donors'

identities. Although parties have greater expenses than revenue, there is currently no legal evidence to substantiate claims of illegal financing.⁹⁷

Publication of political finance reports

In most countries, the oversight institution must publish political finance and audit reports, but a similar obligation for political parties themselves exists only in **North Macedonia** and **Bosnia and Herzegovina** for annual reports. In **Serbia**, political parties have only to publish annual reports, but not campaign reports, on their websites.⁹⁸

In **Montenegro**, annual reports published on the website of the anti-corruption agency align with legal requirements, including balance sheets, income statements and donor names. However, parties are not required to publish bank statements from special accounts for election campaigns. Documents such as bank statements and contracts with suppliers are declared "bank secrets" by the agency, but most political parties have provided them in the past in response to freedom of information requests by MANS. In **Bosnia and Herzegovina**, publication of reports by the election management body is often delayed, due to capacity gaps and audit reports taking, on average, two to three years. In **Kosovo**, delays in audit processes of three to four years prevented the publication of reports within legal deadlines. The former Law on Political Financing required financial statements to be published alongside audit reports, which the electoral management body interpreted as meaning unaudited reports could not be published. In 2022, an amendment to the law altered this requirement, allowing reports to be published within the legal deadlines, regardless of whether they had been audited. In **Türkiye**, delays of three to four years in publishing audit results limit transparency. Questions about the Constitutional Court's capacity, including human resource qualifications and technical challenges related to divergent accounting methods, negatively impact the effectiveness of financial oversight the court provides.⁹⁹

Format of political finance reports

In most countries in the region, the norm is for political parties to submit financial reports to the relevant oversight institutions in the cumbersome form of hard copy. Only **Bosnia and Herzegovina** and **Serbia** have made positive strides by stipulating the submission of soft copies. However, the

progress in this regard is far from ideal, as this requirement extends solely to political parties and excludes candidates.¹⁰⁰

In addition, soft copies, when required, are typically restricted to scanned versions in PDF format, a choice that significantly limits the potential for meaningful analysis and oversight. None of the countries assessed offer open data and machine-readable files of political finance information. This hinders the efficient identification of irregularities, the detection of potential conflicts of interest, and the timely discovery of violations of campaign finance regulations.¹⁰¹

For example, in **Serbia**, data is accessible in html format through the anti-corruption agency's website, which maintains separate databases for individual annual reports on the finances of political entities and electoral campaign expenditure. In **Bosnia and Herzegovina**, political finance data is accessible on the electoral management body's website, in the form of individual PDF documents.¹⁰²

The least accessible formats are in **Kosovo**, **Montenegro** and **North Macedonia**, where reports are only available in the form of scanned PDF documents.¹⁰³

Political finance oversight

Most institutions in charge of overseeing political finances in the seven countries assessed do not have sufficient independence and resources to conduct the necessary verification and control of political finance, as shown in Table 6.1. While sanctions are prescribed by law in all seven jurisdictions, they are either relatively minor – such as fines below the legal minimum – or seem not to be enforced at all.¹⁰⁴

In **Albania**, there have been several media reports suggesting that violations of campaign finance provisions exceed the activities for which the electoral management body has issued sanctions. These include failure to declare expenditure, and spending more than the limit imposed by the Electoral Code. In **Serbia**, the anti-corruption agency does not promptly respond to alleged violations of political finance rules, which may impact the prevention of similar violations, especially during election campaigns. Sanctions for non-compliance, such as warning measures instead of fines, are considered insufficient, potentially eroding their deterrent effect.¹⁰⁵

Table 6.1: Overview of political finance oversight institutions¹⁰⁶

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Responsible authority	Electoral management body (EMB)	Electoral management body (EMB)	The Office for Financial Control	Supreme audit institution (SAI); Anti-corruption agency (ACA)	Supreme audit institution (SAI); Anti-corruption agency (ACA)	Anti-corruption agency (ACA)	Constitutional Court (CC); Electoral management body (EMB); Supreme Audit Institution (SAI)
Sufficient resources to conduct verification and audit	No	No	No	SAI: Yes ACA: No	SAI: Yes ACA: No	No	CC: No EMB: Yes SAI: Yes
Independence	No	Partly	Partly	SAI: Partly ACA: No	SAI: Yes ACA: Yes	No	CC: No EMB: No SAI: No
Dissuasive sanctions in law	Partly	No	No	No	Partly	Yes	Partly
Dissuasive sanctions in practice	No	Delayed	No	No	Partly	No	No

In **Türkiye**, there is no evidence for whether sanctions are applied for breaches of campaign finance rules. According to GRECO, Türkiye should introduce effective, proportionate and dissuasive sanctions for infringements of yet-to-be established regulations concerning election campaign funding of political parties and candidates. GRECO's report noted that no information was provided on whether complaints over this issue led to any investigations into financial irregularities, or to sanctions. The anti-corruption agency and electoral management body in **North Macedonia** have the most limited sanctioning powers of the region's oversight institutions.¹⁰⁷ While other oversight institutions have powers to suspend public funding and forbid participation in future elections, the anti-corruption agency can only levy fines¹⁰⁸ and refer cases to the relevant courts. Currently there is only one such case in court, and no data on other sanctions in the form of fines levied by the anti-corruption agency itself.¹⁰⁹ In **Kosovo**, violations of accuracy in reporting have so far gone unsanctioned by the Office for Financial Control, due to the lack of resources, especially staff.¹¹⁰ In **Bosnia and Herzegovina**, no sanctions are defined for not publishing financial reports on time, but there are sanctions for other breaches of the law. The fines

given to political parties for violations of the Law on Financing of Political Parties are imposed with delay, due to delays in undertaking audits, while some political parties are allowed to pay the fines in multiple instalments.¹¹¹

Foreign influence in election campaigns

There have been ongoing concerns about Russian influence in election campaigns in **Montenegro**, **Albania**, and **Bosnia and Herzegovina**, even if outlawed, through illegal donations using legal loopholes to hide their source.¹¹²

For example, in **Montenegro**, according to *Voice of America*, the Russian Federation allegedly provided funding to the Democratic Front in the 2016 election, and probably in the 2018 election, through **offshore companies**.¹¹³ In 2022, the Democratic Party in **Albania** was accused of accepting around €465,000, allegedly originating from Russia and channelled via fictitious companies, according to a US State Department report. The same report claims that hidden foreign donations were made to **Bosnia and Herzegovina**, as well as **Montenegro**.¹¹⁴ To limit such risks, beneficial

ownership transparency is essential to ensure transparency in financial flows used to hide the origin of party donations and circumvent donation caps. However, only **Albania**,¹¹⁵ **North Macedonia**¹¹⁶ and **Serbia**¹¹⁷ have established a public beneficial ownership register. **Montenegro** has a non-public register. However, the public registers require mandatory registration and there is a lack of information on the verification of the data in these registers, raising doubts about the accuracy of the data and whether it contains the real beneficial owner.

Montenegro also suffers from political influence from Serbia, and there are claims that Serbia has been acting as a Russian proxy since 2016, following allegations of Russia's and Serbia's involvement in attempts to overthrow the government in 2016.¹¹⁸ After 2016, Russia's actions are much less visible, while Serbia takes over the dominant role in malign influence, especially in the election period. This includes interference by the Serbian government, media close to the regime in Serbia, and businesses.¹¹⁹ Such interference by Serbia has also been noted in the Republika Srpska entity in **Bosnia and Herzegovina**. In **Kosovo**, electoral intimidation targeting candidates in Serb-majority municipalities has been reported, possibly backed by foreign entities. Additionally, the Serbian List, a Serb minority political party in Kosovo, received direct support from Serbian institutional figures, accompanied by allegations of intimidation and stigmatisation aimed at suppressing other Serbian political parties in Kosovo.¹²⁰

ELECTION INTEGRITY

Elections in the Western Balkans and Türkiye share common challenges that influence the overall integrity of the voting procedure. These relate to the accuracy of voter lists, issues encountered during vote counting, and compromised independence of the electoral management body at national and subnational levels. In countries such as **Serbia** and **Türkiye**, international election observers have noted electoral manipulation and severe irregularities, as well as restriction and attacks on election monitoring organisations for their reports.¹²¹

Accuracy and verification of voter lists

Issues with the accuracy or verification process of voter lists have been registered to some extent in all Western Balkan countries and Türkiye. In **Albania**, international observers have reported instances where voters have faced restrictions outside working hours in accessing premises where voter lists are posted in order to allow verification of their accuracy.¹²²

In **Bosnia and Herzegovina**, automatic voting registration for citizens with IDs has simplified the registration process. Efforts have been made to enable citizens to verify their registration data, addressing irregularities from previous elections. However, concerns about the accuracy of the voter registry persist, with dependence on data from other institutions who are responsible for updating the civil register. In **Kosovo**, citizens can challenge the accuracy of the voter list, but inaccuracies remain, including significantly more people on the voter list than residents, and incorrect addresses. In **Türkiye**, survivors of the 2023 earthquake faced registration challenges during the presidential and general elections. In **Montenegro**, concerns about the accuracy of the voter register include questions about permanent residence records and possible duplications. In the 2022 presidential and parliamentary elections in **Serbia**, the Albanian minority representatives alleged disproportionate deregistration of addresses in southern Serbia during the previous decade.¹²³

Organisation of voting procedures

In countries across the region, issues have been noted during the election process. These include delays in vote counting due to lack of staff, technical issues in publishing results, and inadequate measures to ensure voting secrecy, due to the layout of polling stations. According to civil society observers, there have been multiple issues during the vote-counting process in **Albania**. For instance delays commonly occur due to fatigue among ballot-counting teams, indicating insufficient staffing levels. In **Bosnia and Herzegovina**, election cycles include significant delays in calculating and publishing results, due to inefficiencies within polling station committees and local election commissions caused by a lack of qualified staff. In **North Macedonia's** early parliamentary elections in 2020, technical issues led to delays in reporting voter turnout data on election day. Officials had to

resort to phone calls and text messages to gather this information, and there were faults in the web application displaying preliminary results after polling stations closed. The president of the electoral management body blamed a cyber-attack for these disruptions, although this did not affect the vote-counting process.¹²⁴

In **Montenegro**, international observers raised concerns about voting secrecy due to the layout of polling stations and the placement of voting screens. Trust in elections declined when local election results in Šavnik were delayed for over a year, missing the legal deadline for their publication. In **Serbia**, the electoral management body has a well-organised and transparent approach to elections. However, Local Election Commissions have faced challenges such as managing simultaneous parliamentary and local elections in 2023, low pay, shortages of nominations to polling boards, and frequent last-minute changes to their composition.¹²⁵

The new election law in **Kosovo** raised the number of preferential votes per voter from five to 10. However, data indicates that voters usually select only around four candidates. This change extends the counting process and opens the door for manipulation by commissioners, particularly if voters mark fewer than the maximum 10 candidates, creating opportunities for vote rigging.¹²⁶

Independence of lower-level electoral management

Electoral management bodies across the region generally have low levels of independence, and are often divided along party lines (**Albania, Kosovo, Montenegro, North Macedonia, Serbia**), attacked by ruling parties (**Bosnia and Herzegovina**) or biased towards the ruling party and against opposition parties (**Türkiye**). Lack of independence is an even greater problem for local election bodies and polling stations.¹²⁷

In the early parliamentary and local elections in **Serbia** in 2023, some local election commissions were vulnerable to political influence, due to shared membership and infrastructure with local authorities, particularly those aligned with the ruling coalition. While **Albania's** electoral management body seeks to ensure the organisation of free and fair elections, it has limited control over the lower administrative levels, making it difficult to monitor the electoral process and ensure its effectiveness. In

Bosnia and Herzegovina, there are significant integrity problems with members of the polling station committees. These members are nominated by political parties and appointed by local election commissions, which raises concerns about their impartiality and fairness. In **Montenegro**, while the public can access information about the organisation and operations of the election management body at national level, many decisions made by local election bodies are not publicly accessible.¹²⁸

Election irregularities

Some vulnerabilities to irregularities or alleged vulnerabilities have been noted in all countries, with more severe irregularities observed in **Bosnia and Herzegovina, Serbia** and **Türkiye**.¹²⁹

After the 2020 local elections in **Bosnia and Herzegovina**, some members of polling station committees were found guilty of election fraud and tampering with voters' personal information.¹³⁰ In two municipalities, Dobož and Srebrenica, the local elections had to be re-held in 2020 due to widespread fraud by these committees, including manipulation of voter data and ballots. In Dobož, 54 indictments were issued against 256 individuals, mostly members of polling station committees. This pattern has persisted over the years, resulting in the electoral management body issuing numerous penalties to committee members – primarily fines and bans from participating in subsequent elections.¹³¹

In the 2022 elections in **Serbia**, representatives of the Albanian minority accused the authorities of unfairly removing many residential addresses in southern Serbia during the previous 10 years. This led to people losing their right to vote. The issue goes beyond the responsibilities of the electoral management body, but the body could have tried to address it by working with the Ministry of Public Administration and Local Self-Governance and other relevant agencies. During the early parliamentary and local elections in 2023, the international election observation mission OSCE-ODIHR pointed out clear instances of vote buying, violations of voting secrecy, and improper influence on voters.¹³²

In southeast **Türkiye**, despite high voter turnout in the May 2023 general and presidential elections and genuine political alternatives, the incumbent president and ruling parties had an unfair advantage, due to biased media coverage and restrictions on fundamental freedoms. While voters

had different choices, the campaigns were marked by polarisation, misuse of administrative resources, and intimidation of opposition parties. The OSCE-ODIHR election observation mission noted that despite generally positive organisation on election day, observers noted some procedural shortcomings during voting and counting. In eastern and southeastern provinces in particular, where the Kurdish population is higher, governors widely used their authority to restrict rights and public activities, in the name of combatting terrorism and maintaining public safety, thereby impacting election campaigns.¹³³

In **Montenegro**, a candidate for the Europe Now party, was deliberately excluded from the 2023 presidential election process by a political decision of the electoral management body. He was unable to challenge this effectively, as Parliament had failed to elect judges to the Constitutional Court, leaving the Court without the ability to handle constitutional complaints. International observers noted that the body's decision to reject the candidate's registration did not align with national laws and constituted a mishandling of his application, contrary to international standards.¹³⁴

In **North Macedonia**, it is common for political parties that lose elections to publicly blame the winning party for irregularities in the election process. For instance, in the 2021 local election, the opposition party VMRO-DPMNE accused the government led by SDSM of using state money to buy votes. This kind of accusation harms people's trust in the fairness and impartiality of the electoral management body and its members.¹³⁵

Out-of-country voting is identified as one of the most sensitive and vulnerable election processes in **Kosovo**, prone to irregularities and manipulation in almost every electoral cycle. Examples include manipulations leading to the cancellation and repetition of mayoral elections in Istog in 2017 and Dragash in 2021. In 2021, challenges persisted in administering out-of-country voting. The new election law introduces three forms of out-of-country voting: physical voting in diplomatic missions and postal voting outside and within Kosovo. It also establishes procedural deadlines and application methods for voters abroad, with voter registration facilitated through an electronic platform and the electoral management body's physical postal box for verification.¹³⁶

Election monitoring

In all the Western Balkan countries and Türkiye, election observers are generally allowed to monitor whether there is undue influence in the electoral process. However, in **Serbia**, observers were verbally attacked by representatives of the ruling parties after they reported various examples of vote buying, breaches of secret voting, and influence on voters in the December 2023 elections.¹³⁷ The head of the Council of Europe delegation highlighted the president's overwhelming influence throughout the campaign, noting that this breached the neutrality supposed to accompany the president's role.¹³⁸ Prime Minister at that time and now elected speaker of the parliament Ana Brnabić subsequently accused European observers of lying and destabilising Serbia with their statements about the elections.¹³⁹ In **Türkiye**, recent reports indicate limitations on observers' access to voting procedures, hindering opposition parties' monitoring activities. In **Montenegro** during the 2023 presidential elections, the electoral management body denied observers the opportunity to witness the verification of voters' signatures, undermining the transparency of the process.¹⁴⁰ **Bosnia and Herzegovina** has experienced instances of pressure on independent observers, hindering their ability to observe all phases of an election.¹⁴¹

GENDER REPRESENTATION IN ELECTIONS

Legal frameworks in the Western Balkans and Türkiye generally guarantee women's right to vote and run for office. However, there are challenges for women in the voting process in **Kosovo** and **Türkiye**, including misuse of assisted voting provisions, potentially infringing women's right to vote freely and without coercion from male family members. In several countries, such as **Montenegro**, online harassment against women in politics is prevalent, deterring their political participation. Societal expectations and prejudices, especially related to gender roles, also emerge as barriers hindering women's political engagement. Efforts are being made in some countries, such as **North Macedonia**, to enhance gender sensitivity through action plans and training within election administration bodies. However, media coverage in all countries still tends to be biased towards male political figures, further marginalising women in the public narrative. The focus on male leaders

in campaigns contributes to the limited visibility of women in political discourse.¹⁴²

All the countries assessed, except for **Türkiye**, have gender quotas in place for candidate lists, with 30 per cent in **Albania, Kosovo** and **Montenegro** and 40 per cent in **Bosnia and Herzegovina, North Macedonia** and **Serbia**. Despite this legal requirement, quotas are not fulfilled in practice in some countries. For example, **Albania** has imposed sanctions on political parties for non-compliance with gender quotas. However, the effectiveness and consistence of these sanctions vary. **Bosnia and Herzegovina** has faced challenges in that even with quotas in place, women's positions on candidate lists did not lead to their election.¹⁴³

CONFLICT OF INTEREST

The laws on conflicts of interest in most countries assessed are not yet aligned with international standards. In **North Macedonia**, a law was passed in 2019, but although there was a notice in the electronic law register about initiating a process to amend and supplement the law, no amendments have been enacted. In **Serbia**, there is no clear guidance on what constitutes a conflict of interest for an MP in legal terms. In **Albania**, the anti-corruption agency has supported the approval of a new law for preventing conflicts of interest since 2021, but as of July 2023, this has yet to be approved by the Assembly, despite GRECO's deadline of December 2022.¹⁴⁴

In most countries, except for **Bosnia and Herzegovina** and **Türkiye**, the anti-corruption agency handles conflict of interest cases. Although responsibility for implementing conflict of interest laws is decentralised in **Albania**, the anti-corruption agency has the ultimate authority to direct and improve policies and mechanisms for prevention. In **Türkiye**, the institution responsible for this is the Public Officials' Ethics Committee, which reports to the presidency and has 11 members appointed by the president. The committee cannot oversee the president, MPs, members of the Council of Ministers, Turkish Armed Forces personnel, the judiciary, and university staff. In **Bosnia and Herzegovina**, the Commission for Prevention of Conflicts of Interest is responsible at the state level, but is heavily politicised. Most of its members are delegates in the Parliamentary Assembly, the remainder being the director and deputy directors from the anti-corruption agency. This results in

potential conflicts of interest, as commission members make decisions involving their party colleagues and other MPs. Consequently, the commission has become ineffective. At the entity level in the Federation of Bosnia and Herzegovina, there is currently no authority responsible for handling conflicts of interest. In 2013, a new state-level law was passed, stripping the electoral management body of its authority to implement the law at the entity level. Consequently, the Federation of Bosnia and Herzegovina was left without an agency responsible for enforcing entity-level conflict of interest law. However, no amendments have been made to determine who would assume this responsibility or to enact a new law. This allows numerous officials at entity level to retain conflicts of interest. Although a conflict of interest commission has been established in Republika Srpska to enforce the law, its arbitrary decisions and opinions have resulted in numerous conflicts of interest going unpunished. In **Albania**, there are significant issues with the implementation of legislation on conflict of interest, as indicated by the lack of data provided by the anti-corruption agency. Despite 14 conflicts of interest declared by MPs since 2017, CSOs suspect more cases exist without official acknowledgement.¹⁴⁵

In **Kosovo**, the anti-corruption agency is due to launch an investigation into Prime Minister Albin Kurti over a potential conflict of interest related to a rented house.¹⁴⁶ In **Serbia**, the anti-corruption agency reported no cases of conflict of interest among members of the executive in the past year. Three members of the executive voluntarily notified the agency about potential conflicts of interest, and the agency determined that they were not in conflict. In 2019, the agency initiated proceedings against two executive members. It recommended the dismissal of a minister for appointing his son as acting director of a public enterprise without notifying the agency, but displayed bias in the case of another minister, despite evidence of a potential conflict of interest involving his father in arms trade negotiations with a public enterprise.¹⁴⁷

In **Montenegro**, the anti-corruption agency has demonstrated a selective approach, as evidenced by its allowing outgoing government ministers to hold positions as newly elected MPs after the August 2020 elections. The agency delayed decisions on related matters and only in January 2021 finally pronounced on the incompatibility of functions for the prime minister and seven ministers. Conversely, the agency aggressively pursued a case against a civil society representative from MANS on the

agency’s council, alleging a conflict of interest and removing her in 2018. Although the courts annulled the decision, Parliament had already replaced the CSO member.¹⁴⁸

In **Albania**, there are concerns that current sanctions for conflicts of interest are not stringent enough to ensure compliance, despite warnings from international institutions. Throughout its 2018-2022 term, the commission in **Bosnia and Herzegovina** imposed only five fines. In cases, where the person was no longer in their original role, it was unable to impose sanctions, as the fine must be a percentage of the person’s salary and the commission cannot impose fines once the person is in a new position. The commission faced delays, taking almost two years to appoint members, only to have its work blocked again in 2021, while the entire work of the Parliamentary Assembly came to a halt.¹⁴⁹

ASSET DECLARATIONS

In most countries, except for **Bosnia and Herzegovina** and **Türkiye**, the anti-corruption agency is responsible for publication and verification of asset declarations.¹⁵⁰

In **Türkiye**, there is no dedicated institution overseeing asset declarations. For example, MPs and members of the Council of Ministers must submit their asset declarations to the presidency of the Parliament. Staff in public institutions and organisations must submit declarations to the department of personnel and administrative affairs. In **Bosnia and Herzegovina**, the asset declaration system is also scattered. Elected officials, except for government officials, must submit complete forms within 30 days of verification of their mandate, but the regulation does not give specified timelines for their publication.¹⁵¹

Table 6.2: Overview of asset declaration systems¹⁵²

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Responsible authority	Anti-corruption agency	Several (see text below)	Anti-corruption agency	Anti-corruption agency	Anti-corruption agency	Anti-corruption agency	Several (see text below)
Verification	Partly	No	Yes	Partly	Partly	Yes	No
Proactive publication	No	Partly	Yes	Partly	Yes	Partly	No

Asset declarations require no verification for accuracy in **Bosnia and Herzegovina** and **Türkiye**. In **Albania**, the Albanian Helsinki Committee, an organisation working on the rule of law and human rights standards, discovered discrepancies between the findings of the Independent Qualification Commission, responsible for integrity vetting, and the audits conducted by the anti-corruption agency. In **Kosovo**, the agency randomly audits the asset declarations of one third of high public officials, but the selected list is not publicly available. This method has resulted in investigations against various public officials, including the foreign minister and the minister of industry and trade, with criminal reports submitted to the Prosecutor’s Office for non-reporting or false reporting of assets. In **Serbia**, the agency must confirm the accuracy of information in declarations, based on an annual verification plan, which allows the agency to determine the controls for specific officials and categories. Similarly, in **Montenegro**, the anti-corruption agency conducts basic annual checks of the declarations it receives. However, the European

Commission’s enlargement reports for 2022 and 2023 question the agency’s decision making and prioritisation. The increased scrutiny of officials in the new executive since the change of government in 2020 seems to be politically motivated. In **North Macedonia**, asset declarations must be verified, although resource constraints limit a thorough process for all declarations.¹⁵³

In terms of publication, **North Macedonia** and **Kosovo** actively publish asset declarations, according to their legal obligations. There is no such obligation in **Türkiye**. In **Albania**, despite the law requiring publication, the anti-corruption agency has not yet published asset declarations in the online database. However, declarations can be accessed through freedom of information requests. The asset declarations of legislators in **Bosnia and Herzegovina** are available to the public on the electoral management body’s website. However, government officials not directly elected, including cabinet members, directors and board members of public institutions, are not covered by the Election Law, and must declare assets under conflict of interest laws.

Few of the reports submitted under conflict of interest legislation are published, apart from those in Brčko district and Sarajevo canton, and they are only used in the process of determining conflicts of interest. In **Montenegro**, the anti-corruption agency fulfils its obligation to publish the declarations submitted to it. However, except for director of the police administration and deputy directors, members of the administration must submit annual asset declarations to the Ministry of Interior, which does not have to make them publicly available, and it is unclear whether those are collected at all. In **Serbia**, exceptions to publication exist for judges and prosecutors dealing with organised crime, terrorism and high-level corruption cases.¹⁵⁴

LOBBY CONTROL

While **Montenegro**, **North Macedonia** and **Serbia** have made efforts to introduce separate legislation related to lobbying activities, challenges remain in terms of enforcement, transparency and gaps in the law. In **Montenegro**, the Law on Lobbying places the obligation on lobbyists to submit data about lobbying contacts. Legislators are not obliged to report and publish their contacts, limiting transparency in their interactions. There is only limited information in the official registry about lobbyists' activities within Parliament. The new Law on Lobbying in **North Macedonia** introduced a register of lobbyists in 2022, but this was still empty at the end of 2023, indicating challenges in enforcing the new law. In **Serbia**, the Law on Lobbying requires that MPs report lobbying contacts, but they largely fail to comply with these provisions.¹⁵⁵

In **Albania**, the Ministerial Code requires government members to conduct meetings with business or interest group representatives in the presence of two senior ministry officials, with minutes recorded and maintained in a registry by the ministry's Secretary General. The Code of Conduct for MPs also outlines rules for disclosing contacts with lobbyists. However, the register of meetings is not publicly available online and is updated only irregularly.¹⁵⁶

There are no regulations for lobbying activities and no obligation for MPs to disclose informal contacts with individuals perceived as lobbyists or interest groups in **Bosnia and Herzegovina** or **Kosovo**. Existing laws in **Türkiye**, such as the Penal Code, touch on aspects related to lobbying practices, but do not provide a comprehensive regulatory framework.¹⁵⁷

RECOMMENDATIONS TO STRENGTHEN POLITICAL INTEGRITY

To national governments and parliaments

- + **Political finance:** Establish explicit limitations and reporting requirements for third parties taking part in campaigns and which spend above a certain threshold, equal to those for political parties and candidates. Make donations and expenditure by party candidates to their own campaigns explicitly subject to the same limitations and reporting requirements that apply to political parties. **WHO** *All countries.*
- + **Political finance and beneficial ownership transparency:** Fast-track efforts to establish public beneficial ownership registers. Where public registers already exist, remove barriers to access, such as fees and registration requirements. **WHO** *All countries.*
- + **Conflict of Interest:** In line with GRECO recommendations, governments at all levels must adopt a uniform, credible legislative and institutional framework for preventing conflicts of interest, by extending the breadth of its application and the depth of reporting. The legislation should be aligned to the EU directive on conflict of interest. **Who** *All countries.*
- + **Asset declarations:** Establish rules for the declaration of assets, income and interests of MPs and their relatives to an independent agency, which must verify the contents and sanction intentional non-compliance with norms. Criminal sanctions should be in place for severe or persistent breaches, and for those who cannot explain unjustified variations in wealth. **Who** *Bosnia and Herzegovina, Türkiye.*
- + **Lobby control:** Review existing lobbying laws to oblige legislators to report their lobbying contacts on detailed public online platforms. Where such laws do not exist, pass a law that comprehensively regulates lobbying activities, and develop detailed online registers accessible to the public.

Include clear sanctions for failure to adhere to lobbying regulations, and make adherence the responsibility of a centralised, independent oversight agency equipped with the necessary resources. Publish “legislative footprints” which document the time, person and subject of a legislator’s contact with a lobbyist or stakeholder, in order to provide citizens with greater access to information on who gave input to draft legislation.

WHO *All countries.*

To the justice sector

- + **Political finance:** Increase investigations of cases of alleged misuse of state resources during election campaigns and prosecute such cases with heavy sanctions.

WHO *All countries.*

To oversight institutions

- + **Political finance:** Enforce dissuasive sanctions for breaches of political finance rules, including for failure to disclose revenues – monetary or in kind – and expenditures. Invest oversight institutions with the powers and resources to investigate breaches of political finance regulations and to impose sanctions as appropriate, including fines, suspension of public funding, or confiscation of unjustified assets. Ensure political finance data is published in open data formats that are interoperable with open data on contracting and beneficial ownership, interest and asset declaration registers, lobbying registers, and from other sources, as appropriate.

WHO *All countries.*

- + **Asset declarations:** Thoroughly verify asset declaration submissions for accuracy and omissions in a timely manner. Follow detailed advice on how to design and implement an appropriate verification strategy, from the Stolen Asset Recovery Initiative of the World Bank Group and the United Nations Office on Drugs and Crime, based on extensive government surveys. Ensure comprehensive publication of asset declarations on the website of the responsible oversight institution, in both

machine-readable form and via a dashboard with easily understood data for the general public. Consult data users, including journalists and CSOs, before, during and after publication, to ensure that the supply of data matches demand and is functionally useful for accountability. Apply a range of appropriate penalties to those who provide information that is incomplete, inaccurate or late.

WHO *All countries.*

To political parties

- + **Internal party democracy:** Adopt more democratic internal processes to reduce the concentration of power within party leaders, fostering a more pluralistic and representative political landscape. Party leaders should be elected by all members, not just delegates to party congresses, on the principle of one member, one vote. Political parties should consider introducing maximum terms for party leaders and members of key decision-making bodies, to avoid concentrations of power. Party assemblies open to all members should take place at least once a year, and a special assembly should be called before each election, holding internal referenda on key decisions for the parties’ political programmes.

WHO *All countries.*

- + **Party programmes:** Promote a shift of attention in political parties from clientelist dynamics to long-term programmes and policies focused on questions of nationwide interest, rather than identification with a specific group. Identify the incentives, enablers and triggers for politicians to engage in comprehensive political programmes.

WHO *All countries.*

- + **Political finance:** Publish on the party website a list of donors – natural and legal persons – that is updated within a week of a donation being received. Also publish all annual and election reports that list donors and the amount of their donations, including in-kind contributions and loans.

WHO *All countries.*

- + **Gender equality:** Implement gender quotas for internal leadership bodies and mandate that leadership positions are shared with both a male and a female leader at different levels within the party.
WHO *All countries.*

PUBLIC SECTOR INTEGRITY

Countries in the Western Balkans and Türkiye show varying levels of preparedness and progress in terms of public administration reform, according to the latest European Commission enlargement reports of 2023. **Albania, Montenegro, North Macedonia and Serbia** are moderately prepared, with limited progress. **Kosovo and Türkiye** are marked by a lack of progress, with **Kosovo** showing some level of preparation and **Türkiye** placed between some level and a moderate level of preparation. **Bosnia and Herzegovina** is still in the early stage of preparation, but shows some progress.¹⁵⁸

Despite these different levels of preparedness and progress, public-sector issues shared by all countries in the region can be identified. These include political recruitments, especially around elections; misuse of resources and lack of oversight in public procurement; gaps in granting access to information; and a lack of proper whistleblower protection.

POLITICAL RECRUITMENT

All countries in the region show some level of political recruitments based on clientelist networks in the public sector. This occurs particularly around elections, deepening countries' vulnerability to state capture.

In **Türkiye**, the president's power to appoint higher civil servant positions by presidential decree with no recruitment process is used excessively. Regular recruitments involve a formal process including an oral interview in the final stage. The interview stage is often misused to eliminate candidates with higher scores and instead recruit candidates with lower scores but stronger political connections, resulting in nepotism during the hiring process and the selection of individuals ideologically aligned with the government. A 2020 study in **Kosovo** by the Balkans Policy Research Group found that the recruitment

and promotion processes for public-sector positions lack focus on institutional needs or candidate qualifications, but are instead highly politicised, with party loyalty often prioritised over professional capacity. In **Bosnia and Herzegovina**, changes in government leadership often result in widespread alterations to management structures within public services, affecting positions such as directors and members of governing and supervisory boards, as well as numerous advisory roles not legally regulated. Transparency International Bosnia and Herzegovina estimates around 90 per cent of civil servants have been hired due to political parties' clientelist networks. The risk of pre- or post-election reshuffles remains very high, especially in Republika Srpska, due to the absence of a legal requirement to carry out competitive public recruitment in all public services. In **Albania**, prior to the May 2023 local elections, the government allocated substantial funds for municipal projects and cash rewards, which were allegedly more aligned with electoral influence than serving the public interest. Reports from OSCE/ODIHR on these elections highlighted the misuse of state resources at both central and local levels, including claims of pressure on public-sector workers and voters. Similar cases have been reported in **Serbia**. In **Montenegro**, during the presidential and extraordinary parliamentary elections of 2023, state institutions and state-owned enterprises signed more than 12,000 employment contracts.¹⁵⁹

PUBLIC PROCUREMENT

Corruption in public procurement is enabled by entrenched clientelist networks through patronage. This risk is further exacerbated by a lack of transparency in public procurement, with low open bidding rates in some countries, and gaps in oversight of procurement processes in all countries, including insufficient resources and lack of independence.

Albania, Bosnia and Herzegovina and Serbia, in 2020, 2022 and 2019 respectively, have aligned their public procurement laws with EU Public Procurement Directives. However, loopholes remain, with no provisions preventing officials involved in drafting tender documents from later assessing contract implementation in **Albania**. This creates potential for conflicts of interest, corruption and biased decision-making. Individuals may be tempted to manipulate the contract terms or favour certain contractors in exchange for personal gain. There also is less oversight and scrutiny of their decisions, increasing the risk of malpractice going undetected. In **Bosnia and Herzegovina**, the lack of specific provisions for separation of tasks during procurement phases may lead to conflicts of interest. In **Montenegro**, the existing law does not include provisions for a central procurement agency serving the entire public sector, leading to a lack of guidance on regulatory compliance, and fragmentation of procurement policies and controls. Each institution manages its own procurement, or a higher institution may handle it on behalf of the entities under its jurisdiction. Staff responsible for bid evaluation are typically part of the Commission for Opening and Evaluation of Bids.¹⁶⁰

All countries in the Western Balkans and **Türkiye** use electronic procurement systems, with public online platforms for transparency. If there is a clear record of the procurement process, it becomes easier to identify and address instances of favouritism. However, gaps in published data across the region remain, even where strong laws are in place. For example, in **Albania**, the Public Procurement Agency's website provides standardised tender documents and an updated online register of procurement forecasts. However, information on procurement and expenditures is frequently incomplete. The agency fails to include comprehensive data on public-private partnerships in its reports. A 2021 study by the Hertie School of Governance and the Albanian Institute of Science highlighted the issue of fictitious bidding and a lack of oversight. **Bosnia and Herzegovina** still fails to publish public procurement plans and details of low-value procurements. The obligation to publish public procurement plans through an online portal was introduced only in late 2022. Previously, the obligation had rested with each procurement body to publish such plans on their websites, which they

often neglected to do, especially in terms of including low-value procurements in the plans. In **North Macedonia**, procurement procedures show inconsistent implementation of regulations, such as late procedures, limited competitiveness and 31 per cent of tenders being annulled.¹⁶¹

Further vulnerabilities in the region's public procurement lie in relatively low open bidding rates, especially in **Türkiye**, with only 60 per cent of bids open, and to some extent, **Bosnia and Herzegovina**, with 72 per cent, compared to 83 per cent in **Montenegro** and 85 per cent in **Kosovo**. Low open bidding rates indicate a lack of proper safeguards in many public procurement procedures, making them vulnerable to abuse. In **Serbia**, the highest-value projects often bypass procurement provisions through direct agreements that avoid competition and transparency. Since the COVID-19 pandemic, there has been an increased use of negotiated procedures without notice, often unjustified. In **Albania** and **Bosnia and Herzegovina**, there has also been overuse of negotiated procedures without publication of a procurement plan. Such gaps in transparency exacerbate the risk of favouritism in public procurement procedures.¹⁶²

Public procurement oversight, including complaint mechanisms, is handled by specific oversight bodies or commissions. A high number of complaints might point to deficiencies in transparency, procedural irregularities and potential corruption or unethical practices within procurement processes. In 2022, in **North Macedonia**, the Public Procurement Bureau handled 270 tenders, resulting in two cases submitted to the anti-corruption agency and 751 complaints to the State Commission for Public Procurement Appeals. In **Kosovo**, the Procurement Review Body was non-functional, due to the failure to appoint members of the governing board for most of 2021. This contributed to a backlog of approximately 700 complaints related to procurement procedures.¹⁶³

Independence and sufficient resources are key for effective oversight. However, the Public Procurement Authority in **Türkiye** faces challenges to its operational autonomy, due to direct presidential appointments. **Albania's** Public Procurement Commission also faces challenges with independence, due to the Council of Ministers being

responsible for evaluating and shortlisting candidates for positions on the commission. In addition, the Central Purchasing Agency, operating under the Ministry of Interior, depends on the ministry for financial resources. In **Serbia**, the Republic Commission for Protection of Rights in Public Procurement Procedures is an independent body, but there is evidence of inconsistent decision making in cases that are similar, and its capacity has slightly decreased since 2020. In **Bosnia and Herzegovina**, resourcing for oversight has become insufficient, due to the steadily increasing number of complaints received. This is mainly linked to the review body taking longer than it should to make decisions on appeals and to incorporate legal opinions provided by the Court of Bosnia and Herzegovina in appeals procedures.¹⁶⁴

RIGHT TO INFORMATION

In all the countries assessed, gaps in the implementation of right to information regulations include misuse of exception clauses and a lack of proper complaint procedures if access is denied. The right to information is pivotal to fighting public-sector corruption. Without it, such abuses are harder to detect, undermining the watchdog function of civil society and the media.¹⁶⁵

Right to information laws have been established in all Western Balkans countries and Türkiye. However, problems remain in the forms of open definitions for exception clauses, and their scope leading to an unwarranted level of discretion in withholding information in all countries. For example, in **Montenegro**, legal amendments in 2017 introduced significantly more opportunities to deny access to information. Since then, each government has formally worked on improving the law, forwarding it to the EU for review, but it has not been reviewed by Parliament again. In **Serbia**, legal amendments in 2022 prevented the denial of access to information based on the applicant's perceived abuse of this right. However, this also weakened the law by including new grounds for rejecting access to information requests.¹⁶⁶

There are also significant gaps in proactive transparency in some countries. For example, in **Bosnia and Herzegovina**, proactive transparency is

limited, with no obligation for the executive to inform the public about its activities, and it being able to withhold information related to public procurement, privatisation processes, budget implementation, operations of state-owned enterprises, and concession contracts. In **Albania**, most authorities publish the legally mandatory transparency report, including data on requests for information and responses to them. However, these reports often contain only basic information, such as organisational details and legislative frameworks, while crucial information such as annual activity reports, audit reporting and decision-related documents is not consistently made public.¹⁶⁷

In implementing laws on the right to information, all countries have presented cases of the authorities' failure to respond to requests, or of selective and inconsistent disclosure of information, especially regarding public contracts. In **Kosovo**, for example, the media has particularly criticised the Ministry of Health and the government's Security Fund for selective disclosure in response to requests, and the withholding of important contracts. In **Türkiye**, according to reports from international CSOs, the government has intensified limitations on the right to information in law and in practice. As a result, journalists face challenges reporting on law enforcement activities, including cases of police brutality, and the public's right to information has been significantly curtailed. In **Serbia**, the government frequently delays disclosing information on major state deals, such as the unannounced Belgrade airport concession contract.¹⁶⁸ In particular, state-owned enterprises fail to act on information requests or often reject them, citing confidentiality, without assessing whether they are in the public interest, as mandated by the law. Complaints against such enterprises constituted 16 per cent of complaints to the Commissioner for Information of Public Importance regarding right to information in 2022. A related issue is that public institutions often fail to provide requested information in legally required formats, or try to find creative ways to make it more difficult to obtain the requested information. For example, in **Montenegro**, the anti-corruption agency "published" requested documents by pinning them to a locked bulletin board at the entrance of its offices, instead of providing them in electronic form to the requestor. Such cases result in a high level of

complaints to right to information commissions across the region. In **North Macedonia**, 45 per cent of complaints were related to a lack of response from the public bodies that received requests.¹⁶⁹

In addition, the effect of complaint mechanisms remains limited, due to lack of a dedicated body to handle complaints, or lack of sanctions being imposed by such a body. In **Serbia**, if a public agency denies information in response to a request, the requestor can appeal the decision with the Commissioner on Information of Public Importance. However, this does not apply when the access was denied by one of seven top-level public authorities (up from six before 2022), including the government. In such instances, petitioners can only file an “administrative dispute” lawsuit to the Administrative Court, which does not have deadlines for decision making. In practice, the process takes years. Despite the commissioner’s power to impose fines on non-compliant agencies, such penalties are rarely enforced, and decisions by the commissioner are seldom implemented. Further problems include prolonged court proceedings, with courts in **Bosnia and Herzegovina**, for example, taking as long as four years to hand down a ruling. Even more alarming is the situation in **Montenegro**, where judicial verdicts are frequently not respected, and much information is destroyed during court procedures and therefore never provided to the public.¹⁷⁰

WHISTLEBLOWER PROTECTION

Where abuses of power have taken place in the Western Balkans and Türkiye, a lack of whistleblower protection results in a lack of reporting and accountability. This is especially the case when reporting persons face repercussions for speaking up.¹⁷¹

While **Albania**, **Kosovo**, **North Macedonia** and **Serbia** all have implemented a dedicated law on whistleblowing, covering both the public and the private sectors, **Montenegro** and **Türkiye** do not have a separate law on whistleblower protection. Laws governing whistleblower protection in **Bosnia and Herzegovina** exist at the state level and in the Republika Srpska entity, Brčko District and the Sarajevo Canton (one of the 10 cantons in the entity-

level Federation of Bosnia and Herzegovina). The Federation of Bosnia and Herzegovina entity as a whole does not have such a law.¹⁷²

Where laws exist, they are not fully aligned with the EU whistleblower protection directive. For example, in **Albania**, findings of a legal review published by the Albanian Helsinki Committee highlighted deficiencies in the law in key areas, such as the lack of explicit provisions to protect the reporting person’s identity and safety. The law in **North Macedonia** has gaps in terms of civil, criminal and administrative liability for officials involved in retaliation. In addition, it does not allow reversal of the burden of proof. Within **Bosnia and Herzegovina**, laws differ significantly. The state-level law establishes a model overseen by the anti-corruption agency. In contrast, in Republika Srpska, the relevant courts are responsible for ensuring whistleblower protection. The Republika Srpska law offers a broader definition of “whistleblower” than the law at state level, encompassing those disclosing wrongdoing in the private sector. Both laws narrowly focus only on corruption, and the definition of corruption is narrow.¹⁷³

Implementation gaps remain to some extent in all countries. The anti-corruption agency in **Albania**, **Bosnia and Herzegovina** (at state level), **Kosovo**, **Montenegro** and **North Macedonia** is responsible for implementing external whistleblower systems. In **Serbia**, oversight duties are shared between several line-ministries, none of which is in charge of supervising whether cases reported by whistleblowers are properly dealt with.¹⁷⁴

There are also gaps in enforcement of the law to ensure that internal and external whistleblowing systems are properly implemented. For example, in **Albania** in 2021, the anti-corruption agency fined 48 institutions for not establishing a whistleblower unit, adding to a total of 188 fines issued since 2016 for non-compliance. In **Kosovo**, although governmental institutions have appointed whistleblowing officers, most have not yet published their names on their websites. Even though **North Macedonia’s** law was enacted in 2016, by 2022, only 15 per cent of institutions had appointed an authorised person to receive whistleblower reports. In the same year, only nine institutions provided information on received reports.¹⁷⁵

Fear of retaliation is the main reason why people do not report wrongdoing in the countries assessed.¹⁷⁶ The lack of proper case handling and of protection for reporting persons in recent years has resulted in further decreases in reporting in **Albania** and **Serbia**. In **Serbia**, this decline might be the result of mishandling of prominent whistleblower cases and mistreatment of reporting persons. For example, in 2019, a whistleblower who exposed corruption in a major arms factory was not safeguarded, but instead arrested, questioned and placed under house arrest. He is still fighting for fair treatment under the Serbian judicial system.¹⁷⁷ In **Kosovo**, there are isolated cases of intimidation or attacks on whistleblowers.¹⁷⁸ In **Bosnia and Herzegovina**, reporting corruption in the public sector is uncommon, due to inadequate regulations and discretionary practices in granting protection. While **Montenegro** has seen an increase in reporting, this may be related to officials in the administration filing reports about the new government, after the first change in government for three decades.¹⁷⁹

RECOMMENDATIONS TO STRENGTHEN THE PUBLIC SECTOR

To national governments and parliaments

- + **Proactive transparency:** Publish all relevant information on public spending, from the planning process to procurement and contract execution, on a central web portal, in machine-readable open data formats and with a user-friendly dashboard. Ensure links between the phases of spending are transparent, from budgeting, funding and tendering, to contracting, implementation, payments and evaluation. Use unique identifiers and reference numbers to clearly track spending against milestones and targets, and identify beneficiaries. The unique identifiers should be those from company and beneficial ownership registers. Include a publication plan in the central web portal, so observers can ensure information is published in a timely manner.

WHO All countries.

- + **Right to information:** Conduct a thorough review of policies and practices for implementing right to information rules, especially with regard to misuse of exceptions, and strengthen proactive transparency provisions. Include public interest tests in legislation, to help decision makers decide in the public interest whether to disclose or withhold information.

WHO All countries.

- + **Whistleblower protection:** Align existing and new whistleblower laws with the EU directive on whistleblower protection, so they cover all breaches of law and threats or harm to the public interest, such as corruption, miscarriages of justice, specific dangers to public health, safety or the environment, abuse of authority, unauthorised use of public funds or property, gross waste or mismanagement, conflicts of interest and human rights violations. Establish measures in the law to ensure its effective implementation and enforcement, including remedies and legal or financial assistance for whistleblowers who suffer retaliation, proportionate and dissuasive penalties for those who violate whistleblower protection, and penalties for organisations that fail to meet their obligations on internal whistleblowing systems.

WHO All countries.

To the public sector

- + **Public sector recruitment:** Ensure systems for recruitment, retention, promotion and retirement of public officials and other non-elected officials are based on the principles of efficiency, effectiveness, merit, equity and aptitude. Special measures should be applied for corruption-prone positions, including pre-screening, integrity training, and specific checks and audits – including verification of asset declarations.

WHO All countries.

-
- + **Whistleblower protection:** Ensure the presence of channels for reporting ethical misconduct or corruption, and of designated persons to receive reports in all public institutions. Protect public officials and civil servants against all forms of retaliation, disadvantage or discrimination in the workplace linked to or resulting from whistleblowing, when they report in good faith and on reasonable grounds.
WHO *All countries.*

 - + **Public procurement:** Give public stakeholders, such as interest groups, civil society and the public at large, a stronger role in the oversight of public procurement processes. For this, ensure that all necessary data, documents and information are publicly available from the start of the process and that provisions are in place to enable citizens' access to all relevant information. Provide more financial and human resources to oversight bodies and commissions in charge of handling complaints on public procurement.
 - + **WHO** *All countries.*

OVERSIGHT INSTITUTIONS

Oversight institutions in **Kosovo** have the highest level of resources, independence and accountability in the region, and are consequently more effective than in other countries in the region. **North Macedonia** also has effective oversight, despite some resource constraints. **Montenegro** and **Serbia** offer a mixed picture. In **Montenegro**, the supreme audit institution and ombudsperson are relatively effective, enabled by sufficient resources and reasonable independence. However, this effectiveness is still limited by challenges to implementation of their recommendations by the authorities – as is the case, to varying degrees, across the region. In **Serbia**, the supreme audit institution and anti-corruption agency are relatively strong in their work, but are limited by their mandate. For example, the agency lacks power to carry out criminal investigations – a limitation which impairs the work of all anti-corruption agencies across the region. **Albania’s** oversight institutions are moderately effective, with the electoral management body generally receiving the lowest scores and the ombudsperson scoring the highest. The anti-corruption agency in **Bosnia and Herzegovina** and the State Supervisory Council **Türkiye** which is analysed as anti-corruption agency in this assessment are particularly ineffective,

primarily due to lack of independence, as well as under-resourcing.

RESOURCES

The anti-corruption agencies in **Kosovo** and **Montenegro** are relatively well resourced, while those in **Albania** and **Bosnia and Herzegovina** have sufficient financial resources, but insufficient human resources. **North Macedonia** has a decent level of financial and human resources, but increases are necessary if it is to properly fulfil its function, especially with regard to preventing conflicts of interest and monitoring asset declarations. In **Serbia**, financial and human resources have not increased to meet an expanded remit, including lobbying and preparation of corruption risk analysis. In **Türkiye**, the lack of transparency means financial and human resources cannot be assessed.¹⁸⁰

In most countries in the region, the supreme audit institution has good financial and human resources, but problems remain. In **Albania** and **Bosnia and Herzegovina** there are shortfalls in human resources in relation to the entities covered by the institution.¹⁸¹

Table 8.1: Overview of resource (in practice) indicators of national integrity assessments of oversight institutions¹⁸²

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Anti-Corruption Agency	●	●	●	●	●	●	●
Supreme Audit Institution	●	●	●	●	●	●	●
Electoral Management Body	●	●	●	●	●	●	●
Ombudsperson	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

In **Kosovo**, the supreme audit institution still needs more funds to increase its effectiveness, for example, to carry out performance audits. In **North Macedonia**, the Minister of Finance's approval for additional human resources may limit the supreme audit institution's ability to maintain adequate staffing levels, even if their workload increases. Since its founding in 2007, the supreme audit institution in **Serbia** has lacked adequate premises.¹⁸³

The electoral management bodies suffer resource shortfalls in most countries assessed, except for **Kosovo** and **Serbia**. In **Bosnia and Herzegovina**, the approval of funds by the Council of Ministers for the electoral management body was delayed as a means of exerting pressure. This was followed by an insufficient allocation of resources in 2022. High-level officials have clearly articulated that the approval of the budget was conditional on the approval of specific amendments to the election law. In **Albania** and **Montenegro**, funds are also not allocated in a timely manner. **North Macedonia** and **Türkiye** both lack human resources and sufficient professional training of staff.¹⁸⁴

The ombudsman has a good resource base in **Bosnia and Herzegovina**, **Kosovo**, **Montenegro** and **Türkiye**. However, some human resources to handle complaints in time are lacking in **Bosnia and Herzegovina**. The ombudsman institution in **Albania**, **North Macedonia** and **Serbia** lacks permanent staff to fulfil its mandate.¹⁸⁵

INDEPENDENCE

The anti-corruption agencies in **Albania**, **Kosovo** and **North Macedonia** enjoy relatively high levels of independence. However, the agencies in **Bosnia**

and **Herzegovina**, **Montenegro**, **Serbia** and **Türkiye** largely lack independence. In **Bosnia and Herzegovina**, the Council of Ministers exerts influence through the staffing process and the provision of funds. The three top-level positions are filled by each ruling party based on their own ethnic quota. The agency's decision making in **Montenegro** is marked by selective approaches seemingly in favour of different governments. In **Serbia**, selective decision making can also be noted, for example, in the agency's avoidance of dealing with corruption allegations against high-level officials, and its becoming less visible and less critical of the government actions after 2018. The State Supervisory Council in **Türkiye** does not function as an independent anti-corruption agency, as it reports to the president.¹⁸⁶

The supreme audit institution enjoys relatively high independence in most countries, with moderate levels of independence in **Albania**, **Bosnia and Herzegovina** and **Türkiye**. In **Albania**, concerns about independence arise from loopholes in the chair's election process and vague criteria for "adequate financial experience". The election of the current chair was a compromise after an 18-month deadlock, with a prior candidate disqualified due to political party membership. In **Bosnia and Herzegovina**, attempts at political influence occasionally occur at state- and entity-level audit institutions. In 2021, ministers tried to undermine the authority of the audit institution in the Federation of Bosnia and Herzegovina, describing its reports as biased and unprofessional. In **Türkiye**, the institution's current and former presidents have faced criticism for their alleged ties to the ruling party. Opposition MPs make claims of report censorship and selective auditing practices.¹⁸⁷

Table 8.2: Overview of independence (in practice) indicators of national integrity assessments of oversight institutions¹⁸⁸

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Anti-Corruption Agency	●	●	●	●	●	●	●
Supreme Audit Institution	●	●	●	●	●	●	●
Electoral Management Body	●	●	●	●	●	●	●
Ombudsman	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

Electoral management bodies across the region generally have low levels of independence, especially in **Albania, Bosnia and Herzegovina, Kosovo, Montenegro** and **Türkiye**. In **Albania**, and **Kosovo** electoral commissioners are divided along party lines, which is reflected in their voting behaviour. In **Bosnia and Herzegovina**, attacks by ruling parties – in the form of constantly questioning decisions, threats of dismissals and insufficient allocations of funds – greatly undermine the authority of the institution. In **Türkiye**, the electoral management body's decision in favour of the ruling party and against opposition parties indicates strong political influence.¹⁸⁹

The ombudsperson institution enjoys a high level of independence in **Kosovo, Montenegro** and **North Macedonia**, but only some level of independence in **Albania**, due to misuse of the appointment process for political bargaining. In **Bosnia and Herzegovina**, two ombudspersons, from the Bosniak and Croat communities, were reappointed in 2022, serving their third consecutive term, while the new ombudsperson for the Serbian community had a political background, raising questions over his independence. In **Serbia**, the fall in control procedures and recommendations indicates self-censorship and political interference. In **Türkiye**, the ombudspersons' connections to the ruling party, through prior advisory roles or even having been MPs, raise doubts about their independence.¹⁹⁰

ACCOUNTABILITY

The anti-corruption agency in **Kosovo** and **North Macedonia** displays good levels of accountability, while accountability in **Montenegro** and **Türkiye** is largely lacking. The Parliament of **Montenegro** has not adopted the annual reports of the agency for 2019 to 2021, indicating poor quality and concerns about the agency's effectiveness in combatting corruption. The mandate of the agency's council expired in July 2023, meaning there is no oversight of the agency's director. The parliamentary anti-corruption committee only initiated the process for the appointment of new members of the council in March 2023. This is especially concerning considering that in April 2023, the director of Montenegro's Anti-Corruption Agency was arrested by order of the Special State Prosecutor's Office. The investigation alleges prolonged abuse of her office by securing financial benefits to her and others, causing at least €100,000 in damage to Montenegro's budget. She is suspected of illegally exploiting her position to make decisions on pay and allowances, contrary to the Law on Public Sector Salaries.¹⁹¹ In **Türkiye**, there are no mechanisms for oversight by Parliament or any other independent institution. In **Bosnia and Herzegovina**, the appointment of Nikola Špirić – blacklisted by the United States for corruption – as a member of the parliamentary committee overseeing the work of the agency brought the functioning of the accountability mechanism into question.¹⁹² In **Serbia**, parliament does not evaluate reports by the agency properly, and public scrutiny is limited, with no press conference held by the agency since 2018.¹⁹³

Table 8.3: Overview of accountability (in practice) indicators of national integrity assessments of oversight institutions¹⁹⁴

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Anti-Corruption Agency	●	●	●	●	●	●	●
Supreme Audit Institution	●	●	●	●	●	●	●
Electoral Management Body	●	●	●	●	●	●	●
Ombudsperson	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

The supreme audit institutions in **Bosnia and Herzegovina, Kosovo, North Macedonia** and **Serbia** display a good level of accountability. However, there is evidence of political pressure on the supreme audit institution in **Bosnia and Herzegovina** and due to a loophole in the law, there are no mechanisms that ensure the right of audited institutions to appeal the findings of the supreme audit institution. In **Albania, Montenegro** and **Türkiye**, however, gaps in accountability exist. In **Albania**, the audit institution's financial accounts have never been externally audited, due to Parliament's failure to select an auditor, despite the institution's willingness since 2013 to be audited. In **Montenegro**, audited institutions are unable to appeal assessments by the supreme audit institution, and limited information is available on the external audit of the audit institution's own financial statement. In **Türkiye**, there is limited parliamentary debate on the institution's reports, and insufficient obligations for transparency undermining accountability.¹⁹⁵

Of the region's electoral management bodies, only that in **Kosovo** attains good levels of accountability. Accountability is particularly lacking in **Albania, Montenegro** and **Türkiye**. In **Montenegro** and **Türkiye**, there are no mechanisms for accountability, such as having to submit activity or financial reports to Parliament. In **Albania**, annual reports by the electoral management body remain superficial, and therefore cannot be properly scrutinised. In **Bosnia and Herzegovina**, the electoral management body receives a high number of complaints, but these are usually responded to, albeit with delay. In **North Macedonia**, the electoral management body has shown multiple shortcomings in handling complaints, such as inconsistent application of requirements for accepting a complaint and failure to publish decisions. In **Serbia**, the electoral management body applies an overly formal approach to complaints, leading to the dismissal of the majority due to technical issues. Despite alarming reports from international election observers (see section on "Election Integrity"), the electoral management body only accepted 15 out of 523 complaints during the December 2023 parliamentary election, and 30 out of 929 for elections at all levels held in December 2023.¹⁹⁶

The ombudsperson shows good levels of accountability in **Kosovo, Montenegro** and **North Macedonia**, while there are concerns about the ombudsperson's accountability in **Türkiye**, due to

its election by Parliament and insufficient separation of powers. In **Albania**, discussions of the reports in Parliament remain superficial, while there is no legal obligation for such reviews and discussions in **Bosnia and Herzegovina**. In **Serbia**, the annual report of the ombudsperson was submitted to Parliament after the legal deadline, without any consequences.¹⁹⁷

MANDATE AND EFFECTIVENESS

Kosovo has the best performing anti-corruption agency in the region. However, new legislation on the agency stripped it of its power regarding criminal investigations. The lack of such power is a key problem throughout the region. **Serbia's** agency is effective in some of the preventative measures it carries out, but its track record in detecting, investigating and sanctioning misconduct remains mixed. Agencies in **Bosnia and Herzegovina** and **Türkiye** are both clearly ineffective. In **Türkiye**, the council is not specifically tasked with preventing corruption, but only has a mandate to conduct investigations into alleged administrative misconduct. There is rarely evidence that a case was forwarded to the relevant judicial authorities. In **Bosnia and Herzegovina**, the anti-corruption agency is reasonably active in corruption prevention, but lacks a legal mandate for investigations. Anti-corruption agencies in **Albania, Montenegro** and **North Macedonia** only show some level of effectiveness. The anti-corruption agency in **Albania** is very active in scrutinising asset declarations, but referrals to the prosecution office are low, and the vetting process of the judiciary and prosecution uncovered irregularities not previously detected by the agency. The agency also performs poorly in its roles addressing conflict of interest and whistleblower protection. In 2022, **Montenegro's** anti-corruption agency assessed more laws than in any other year. However, its mandate is limited to the control of asset declarations, and cases against high-level officials are initiated only rarely and are mostly uncovered by CSOs and the media. In **North Macedonia**, the anti-corruption agency's preventative role is limited by a lack of response from the authorities to its recommendations. Its track record on detecting and investigating misbehaviour is also hampered, due to limited investigative powers and a lack of action by the prosecutor.¹⁹⁸

Table 8.4: Overview of average scores for role (in practice) indicators of national integrity assessments of oversight institutions

	Albania	Bosnia and Herzegovina	Kosovo	Montenegro	North Macedonia	Serbia	Türkiye
Anti-Corruption Agency ¹⁹⁹	●	●	●	●	●	●	●
Supreme Audit Institution ²⁰⁰	●	●	●	●	●	●	●
Electoral Management Body ²⁰¹	●	●	●	●	●	●	●
Ombudsperson ²⁰²	●	●	●	●	●	●	●

● NIS score >66 ● NIS score 34-66 ● NIS score <34

The supreme audit institutions in **Kosovo, North Macedonia** and **Serbia** are effective, due to comparatively high levels of independence and sufficient resources. However, their recommendations are not always implemented by audited institutions, limiting their effectiveness to some extent. This is also the case in **Montenegro** and there is limited information on whether misconduct was detected and if sanctions were applied by other authorities. In **Albania** and **Bosnia and Herzegovina**, the audit institutions are further impaired by a lack of human resources.

Recommendations in **Albania** have been rather generic and there is poor follow-up on the audit institution’s criminal referrals. In **Bosnia and Herzegovina**, the audit institutions have a strong track record in detecting irregularities. However, they lack the mandate to investigate and sanction misbehaviour, and there is insufficient coordination with public prosecution and law enforcement agencies. In **Türkiye**, the institution’s effectiveness is limited by the president needing to authorise audits, and there is alleged censoring of reports by the Board of Report Review.²⁰³

Due to lack of independence and shortages of resources, electoral management bodies are the least effective oversight agencies across the region.²⁰⁴ More information on their work in terms of election management and control of political finances – where they have such a mandate – can be found in the “Political Integrity” chapter of this report.

The ombudsperson’s office is the second-best performing institution in the region. **North Macedonia** has the strongest Ombudsperson institution in the region, followed by **Albania, Kosovo, Montenegro** and **North Macedonia**. However, similar to the supreme audit institution, their effectiveness remains limited due to the lack of

response to its recommendations by the authorities. In **Bosnia and Herzegovina**, the ombudsperson’s effectiveness is further impaired by a backlog of cases. In **Serbia**, the ombudsperson has carried out fewer control procedures – such as visiting premises and employees, inspecting documents, or requesting statements from authorities – based on its own initiative, as well as the number of recommendations it provides to institutions. In **Türkiye**, the ombudsperson can only act on complaints and not on its own initiative.²⁰⁵

RECOMMENDATIONS TO STRENGTHEN OVERSIGHT INSTITUTIONS

To national governments and parliaments

- + **Resources:** Provide more financial and human resources to oversight bodies, especially departments in charge of handling complaints:
 - Anti-Corruption Agency
WHO *Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Serbia and Türkiye.*
 - Supreme Audit Institution
WHO *Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, and Serbia.*
 - Electoral Management Body
WHO *Albania, Bosnia and Herzegovina, Montenegro, North Macedonia and Türkiye.*
 - Ombudsperson
WHO *Albania, Bosnia and Herzegovina, North Macedonia and Serbia.*

- + **Independence:** Amend relevant laws to clearly outline objective, transparent and merit-based systems for the appointment, transferral and dismissal of leadership positions, including the leading decision-making bodies of oversight institutions. Consult and engage civil society in a meaningful way in the process. Limit the possibility of reappointments to two consecutive terms.
WHO *All countries.*
- + **Accountability:** Amend relevant laws to ensure all oversight institutions have clear obligations in terms of the content of their own financial and activity reports, with deadlines for their submission.
WHO *All countries.*
- + **Effectiveness:** Give anti-corruption agencies the power to conduct criminal investigations.
WHO *All countries.*
- + **Effectiveness:** Establish and impose measures that effectively compel government officials to respond to oversight actions. Measures can include censure of non-compliant executive officials, recommendations for executive action against executive officials at fault, and suspension of bills sponsored by non-compliant ministers before parliament. Where applicable, an offence of contempt of parliament should be legally established, and imposed in cases of unjustified repeated refusal by summoned officials to appear before parliament, or of giving false information.
WHO *All countries.*
- + **Gender mainstreaming:** Work with gender-issue specialists and consult with women's rights CSOs to introduce gender-sensitive protocols into countries' complaints and investigation mechanisms. These protocols and guidelines should introduce front-facing women staff; gender-disaggregated statistics on complainants, published in the institution's annual reports; regular training on gender for officials and staff, and production of awareness-raising material for optimal implementation of gender-sensitive mechanisms.
WHO *All countries.*

To oversight institutions

- + **Effectiveness:** Increase the mandate of anti-corruption agencies to enable them to conduct criminal investigations.
WHO *All countries.*
- + **Effectiveness:** Improve cooperation with civil society through information sharing and knowledge transfer, especially on high-profile cases.
WHO *All countries.*

CIVIL SOCIETY AND THE MEDIA

Civil society organisations (CSOs) and the media, especially investigative journalists, stand out as indispensable pillars in the fight against corruption in the Western Balkans and Türkiye. They have the role of watchdogs, monitoring, exposing and combatting corruption on multiple fronts. Across the region, civil society faces challenges to civic space, affecting its ability to influence policy reform and combat corruption. Civic space is assessed by CIVICUS as “narrowed” in **Albania, Kosovo, Montenegro** and **North Macedonia**, “obstructed” in **Bosnia and Herzegovina** and **Serbia**, and “repressed” in **Türkiye** (see Graphic 9.1). There are notable successes in advocacy campaigns and investigative journalists exposing high-level corruption cases, but prosecution of such cases (see chapter on justice sector) and engagement by government institutions on policy development often remains low or superficial, suggesting that state authorities do not see civil society as an important partner. Governments do not usually welcome criticism aimed at improving control of corruption, and are more open to government-operated non-governmental organisations (GONGOs),²⁰⁶ using them as proof of their openness to cooperation with civil society.

KEY CHALLENGES FOR CSOs AND THE MEDIA

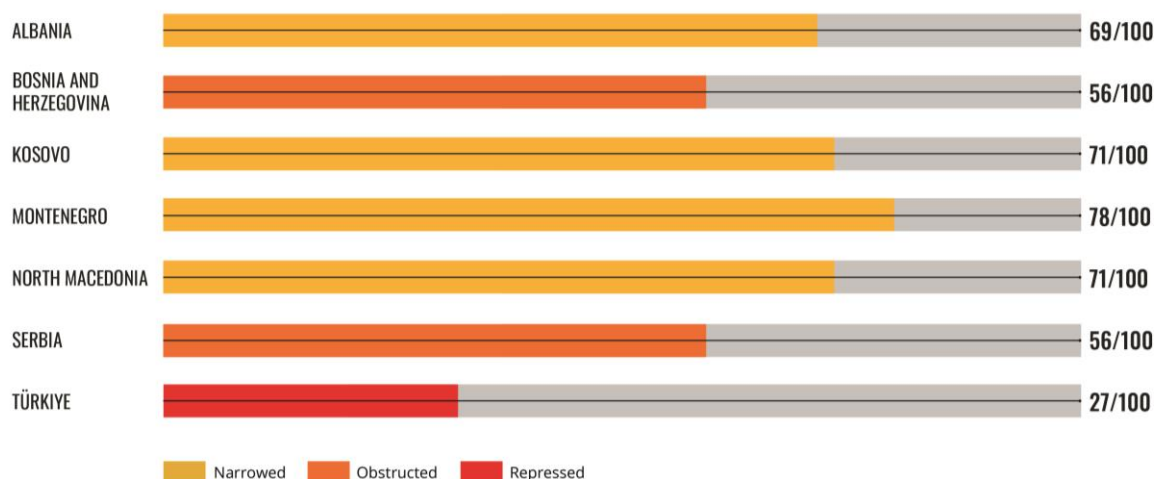
Across the region, the civic sector faces shared challenges, highlighting common patterns of concern. These include challenges posed by restrictive laws and misuse of laws in general; verbal and physical attacks on journalists and CSO activists; issues of media concentration or high dependency on either government funding or income from advertising. Some countries also face issues with

GONGOs that appear to be independent CSOs, but are actually controlled or heavily influenced by the government.

Restrictive laws: defamation, SLAPP, foreign agent and terrorist financing

Governments in the region use a series of restrictive laws to shrink civic space. Legal actions – especially strategic lawsuits against public participation (SLAPP) – are used to suppress independent journalists and CSO activists in **Albania, Bosnia and Herzegovina, Montenegro, Serbia** and **Türkiye**.²⁰⁷

Civil society in **Albania** faces challenges including a significant increase in disproportionate fines issued by tax authorities for relatively minor administrative irregularities, such as failure to provide information. In **Bosnia and Herzegovina** in 2023, the entity Republika Srpska criminalised defamation and other offences related to freedom of expression. According to international human rights bodies, defamation should be treated as a civil matter, and not a criminal offence. In 2023, Republika Srpska also adopted a draft law known as the “Foreign Agents Act”, officially entitled the Law on the Special Registry and Publicity of the Work of Non-Profit Organisations. This categorises organisations funded by external sources as “agents of foreign influence”, irrespective of their activities. These laws aim to undermine the legitimacy and credibility of CSOs in the eyes of the public. In **Türkiye**, the Terrorist Financing Law enables administrative harassment, allowing the government to appoint trustees, suspend activities or dissolve associations facing terrorism charges. Terrorism legislation is widely abused to persecute legitimate activists.²⁰⁸

Graphic 9.1: CIVICUS Monitor 2023 National Civic Space rating in the Western Balkans and Türkiye²⁰⁹

Verbal and physical attacks

Ongoing verbal and physical attacks, including false accusations, contribute to an environment where CSOs must operate with caution. This can also lead to self-censorship.²¹⁰

Verbal attacks by politicians have been noted in all Western Balkan countries and Türkiye, to some extent. In **Albania**, civil society activists encounter ongoing intimidation and harassment, with smear campaigns by traditional media, government and political parties discrediting CSOs critical of the government. In **Bosnia and Herzegovina**, attacks on activists via social media are increasing, including verbal threats, death threats and hate speech. CSOs in **Kosovo** generally operate freely, but verbal attacks and false accusations, often by politicians, directed at CSOs critical of the government occur occasionally. In **Montenegro**, verbal attacks by the government aimed at CSOs critical of it have continued since the political changes, especially after the government lost a vote of no confidence.²¹¹ Despite a historical change in government in 2020, patterns of discrimination, intimidation and stigmatisation persist. In **North Macedonia**, CSOs critical of the government can operate more freely since the government led by the Social Democratic Union of Macedonia assumed power. However, according to Freedom House, CSOs receiving foreign funding face verbal attacks from the former government party and its supporters.²¹²

In **Albania**, **Bosnia and Herzegovina**, **Kosovo** and **Türkiye**, journalists and activists have experienced physical attacks, while in **Albania**, they face police violence and attacks by organised crime, which have

been met with impunity. In March 2023, the headquarters of a TV channel was attacked with automatic weapons, causing the death of a security guard.²¹³ In **Bosnia and Herzegovina**, journalists and activists – especially environmental and LGBTQI people – have experienced the most severe persecution in years. Journalists were attacked by a former police official, and a crime reporter was detained by the police in an attempt to force him to reveal his sources. Reporters from various media have also suffered insults, threats and verbal attacks by the highest-level officials. In **Kosovo**, investigative reporters covering corruption and security issues have faced physical attacks during their work. Despite investigations by police and prosecutors, these attacks seldom result in legal action. In **Montenegro**, attacks on journalists have continued, but only recent cases have been resolved in court. Most previous cases of physical attacks on journalists and CSO activists – including severe incidents such as the murder of journalist Duško Jovanović in 2004, or the attempted murder of journalist Tufik Softić in 2007 – remain unsolved.²¹⁴ In **Türkiye**, detentions and arrests of civil society actors on unfounded charges related to national security or terrorism are common. In **Serbia**, watchdog CSOs are effectively considered political enemies of those in power, which fuels verbal and physical attacks.²¹⁵

Media ownership and lack of independence

In the Western Balkans and Türkiye, media landscapes involve distinct challenges linked to their independence. **Bosnia and Herzegovina** is

dominated by government-funded media. **Albania, Montenegro, North Macedonia, Serbia** and **Türkiye** face issues related to the concentration of ownership of private media linked to ruling parties or private-sector elites. Meanwhile, the media in **Kosovo** struggles with financial pressures, primarily driven by an over-reliance on advertising.²¹⁶

In **Bosnia and Herzegovina**, a majority of media outlets are financially dependent on government budget allocations, and many television and radio stations are owned by local governments. Government ownership of these media outlets, or their reliance on public funding, results in the exclusion of critical voices, including civil society. However, there has been a notable rise in the establishment and operation of private radio and TV stations and online media outlets in recent years. Those that are independent are mostly non-profit media and registered as CSOs. On the contrary, **Kosovo's** private broadcasting companies, responsible for most TV media, face financial challenges, mainly relying on advertising revenue, potentially making them vulnerable to influence by private sector elites. The exception is Radio and Television of Kosovo (RTK), which receives public funding from the state budget. In **Montenegro**, the state remains a significant contributor to public broadcasters' budgets, while private media face pressures from the private sector and advertisers, and even foreign influence, to portray those actors in a good light, leading to concerns about their credibility and professionalism.²¹⁷ For example, the Chinese embassy in Montenegro organised a tour for local journalists to visit China and construction company CRBC, involved in a highway project in Montenegro. Despite environmental pollution allegations against CRBC, the articles stemming from the visit portrayed China and the company positively.²¹⁸

The TV media market in **Albania** is largely dominated by four families and the public broadcaster, together holding 72-84 per cent of the market share. These families also control up to 87 per cent of the TV audience, which gives them significant influence over public opinion. Allegations indicate a concerning cycle of media collusion with governments and criminal groups, to advance agendas in lucrative sectors such as construction, banking and gambling. Additionally, there are claims of media entities and journalists receiving payments to suppress corruption scandals. **North Macedonia** also faces challenges in terms of concentration of media ownership and political influence. Some media outlets have been associated with specific

political parties or individuals, which can potentially limit the diversity of perspectives and the independence of journalists.²¹⁹

In **Serbia**, despite the state relinquishing its media ownership role, practical challenges have hindered the achievement of goals set in the media strategy. Notably, the 2023 laws include a provision that effectively allows a return to state co-ownership of private media in Serbia. The majority of private media outlets rely on advertising and non-transparent public subsidies, both controlled predominantly by the ruling parties and their clientelist network. In **Türkiye**, a significant portion of the media is allegedly owned by specific political and economic interest groups, and Reporters Without Borders notes that 90 per cent of the national media is under government control, further highlighting concerns about media independence in the country.²²⁰

Misuse of CSO structures

CSOs are also often misused as a vehicle for government and political party interests. Government-organised non-governmental organisations (GONGOs) are a notable issue in **Bosnia and Herzegovina, Montenegro, Serbia** and **Türkiye**. Such organisations appear to be independent CSOs, but are actually controlled or heavily influenced by the government.²²¹

In **Bosnia and Herzegovina**, there is a clear rise in GONGOs during election seasons, often utilising CSOs financed from public budgets for political campaign purposes. A common pattern involves these organisations being dissolved after fulfilling predetermined tasks and once they have received budgetary funds. Transparency International Bosnia and Herzegovina reports that in the last two election cycles, over 800 election candidates led CSOs that received public funding, with the majority being veterans' and religious organisations. In **Serbia**, GONGOs and CSOs organised by political parties are used occasionally to create an impression of support for government actions and dialogue, while genuine civil society engagement in the policy process is very limited. Government-controlled women's organisations in **Türkiye**, referred to as "women-GONGOs", are reportedly undermining genuine feminist groups. Research suggests that women-GONGOs serve to promote conservative, anti-feminist and religious interests, legitimising patriarchal views on women's roles, in defiance of human rights principles.²²² The most prominent such group is KADEM, co-founded by the president's

daughter, who is also chair of the board of trustees of the Kadem-Foundation.²²³ In **Montenegro**, a minimum of 0.5 per cent of the annual budget must be allocated to the financing of CSOs. However, funding processes show a lack of transparency, a reduction in independent evaluators, and the uneven distribution of funds, with favouritism towards established CSOs. The government is currently inviting CSOs to apply for co-funding for EU projects that are already approved. This is especially concerning given European Commission plans for candidate countries to take over distribution of EU funds entirely, once they become EU members.²²⁴

Lack of independence in media oversight

Media oversight bodies are marked by appointments with political influence in **Albania, Bosnia and Herzegovina, Serbia** and **Türkiye**. The appointment of the former Socialist Party spokesperson as the head of the Audiovisual Media Authority (AMA) in **Albania** raised concerns about the institution's non-partisanship. The political ties of AMA's executive board members are also under scrutiny. However, despite allegations that the government uses licences to manipulate the media landscape, there have been no noticeable politically influenced decisions by AMA to date. In **Bosnia and Herzegovina**, the Communications Regulatory Agency (CRA) faces challenges to its independence, especially politically and financially. There have been controversies, such as when the CRA decided to shut down certain TV transmitters, leading to accusations of political motives from affected TV stations. Additionally, the appointment of the CRA director has been criticised, due to his past roles and connections to politically sensitive positions. The Regulatory Body for Electronic Media (REM) in **Serbia**, although theoretically independent according to the law, faces criticism for lacking independence in practice, particularly in allocating national broadcast frequencies to pro-government media. Historically, the REM was primarily composed of individuals appointed by the government. Changes to media laws in 2023 aimed to address this by allowing independent experts to propose REM council members, although Parliament will still have the final say in their election. The High Council for Broadcasting in **Türkiye** is controlled by nine elected council members, based on party representation in Parliament: five members from the ruling Justice and Development Party, two from the Republican

People's Party, one from the Nationalist Movement and one from the People's Democratic Party.²²⁵

As the main media regulator in **Montenegro**, the Agency for Electronic Media displays professional conduct. However, it still lacks sufficient authority and measures to adequately monitor and penalise broadcasters. There remains a need to strengthen its operational capacity further. In **Kosovo**, the effectiveness of the Independent Media Commission (IMC) as the main regulatory body for the media has often been questioned, due to a perceived lack of professionalism and insufficient membership. In 2021, the selection process for IMC members failed, leading to criticism from political actors, civil society and international journalists' organisations. This resulted in the board's dysfunction for over a year, with unresolved complaints.²²⁶

CIVIL SOCIETY AND THE MEDIA AS ANTI-CORRUPTION WATCHDOGS

Lack of involvement of CSOs in anti-corruption policymaking

In general, despite challenges to civic space, CSOs across the region are active in holding governments to account,²²⁷ including through investigations, monitoring activities and legal actions. Through these activities, CSOs have gathered significant expertise, making them important actors in policy development. Yet their involvement in shaping policy remains largely limited and pro-forma in most countries in the region, and governments seldom act on their recommendations – as in **Albania, Bosnia and Herzegovina, Montenegro, Serbia** and **Türkiye**. Conversely, CSOs in **North Macedonia** actively participate in policymaking processes, contributing to legislative reforms, including whistleblower protection, lobbying control and the national anti-corruption strategy. Yet despite positive collaboration, concerns about government cooperation and resistance to CSO recommendations persist. CSOs in **Kosovo** have contributed to various laws, including those related to political party financing, elections, asset declaration, the criminal code and preventing corruption. Despite ongoing calls from CSOs, and the fact that the current government is in the last year of its term, there remains a failure to adopt an anti-corruption strategy, although some progress has been made in drafting one.²²⁸

In **Montenegro**, the government involves CSOs in developing public policies, but their inputs are often considered only when the government lacks capacity and expertise. However, since the change of government after three decades in 2020, the space for reforms has narrowed, and the government has ignored CSOs' suggestions and warnings. Despite participating in the negotiation process for EU accession, CSOs find their membership in working groups to be more of a formality. The council for cooperation between state authorities and CSOs, established in 2014, aimed to improve collaboration, but it has not held regular meetings.²²⁹

In **Albania**, practical implementation of public involvement in drafting laws is impeded by provisions that demand comments and recommendations on draft acts to be submitted in the form of amendments. Public hearings involving experts and representatives from civil society, interest groups and other concerned parties during legislative processes in parliamentary committees depend on the committee's discretion. In **Bosnia and Herzegovina**, the e-consultation platform is ineffective, and despite promises of CSO engagement in drafting strategic documents, civil society input is often ignored. In **Serbia**, there are limited formal mechanisms for inclusion in practice, despite a relatively good legal frameworks in this regard. Representatives from the government or ministries often reject CSOs proposals, whether submitted by their representatives in taskforces that draft an act, or within the public debate. In **Türkiye**, according to a 2022 survey conducted by the YADA Foundation, 67 per cent of participating CSOs did not work with a political party directly or indirectly, while 66 per cent of respondents thought that political parties are not open to civil society influence. Only 3 per cent thought otherwise, with 30 per cent remaining neutral. Despite these challenges, CSOs in the Western Balkans have still achieved some advocacy successes.²³⁰

Independent media

Independent media across the region have been quite active in uncovering many grand corruption cases.²³¹ However, they often face a muted response from the authorities, and investigative journalism remains relatively limited across the media landscape. Traditional media often report on high-level corruption cases only selectively, partly due to financial dependence on governments, as in **Bosnia and Herzegovina** at state and entity level. In **Albania**, programmes that use satire for

investigative purposes usually only address petty corruption and current events. TV shows such as "Publicus" in 2016 and "The Unexposed" in 2019 reportedly faced closure by TV networks after revealing grand corruption scandals. In **Kosovo**, well-established media such as the national TV channel Klan Kosova, alongside online portals such as Kallxo.com and Nacionale, focus on investigative journalism, particularly in the fight against corruption. In **North Macedonia**, the investigative show "KOD" on Kanal 5 TV focuses on high-profile cases and simulates scenarios based on current facts, statistics and data. In **Bosnia and Herzegovina**, investigative reporting is mostly carried out by non-profit media financed through international donors. **Serbia's** media landscape is highly fragmented, characterised by major outlets engaging in questionable tabloid-style journalism, supported by the authorities. Conversely, independent media, critical of those in power, exist but often have limited reach. A 2023 analysis by the CSO Centre for Research, Transparency and Accountability highlights that the current state of Serbian media is marked by information disorder, featuring intense propaganda and manipulation of facts. However, investigative programmes are highly important in uncovering corruption cases. In **Türkiye**, independent journalists continue to investigate and reveal corruption despite governmental pressures and a media landscape largely controlled by the state.²³²

GENDER-SENSITIVE PROGRAMMING AND REPORTING

Ensuring gender sensitivity in CSO work and media reporting is important for a comprehensive understanding of corruption's impact on different groups within society. Gender-sensitive approaches and reporting help in identifying and addressing corruption issues that specifically affect women.

While many CSOs in all countries in the region use gender-sensitive approaches in their work, and despite the sector largely being female led, gender-mainstreaming, including gender-disaggregated data collection, is largely driven by donor demands. In **North Macedonia**, only 21 per cent of CSOs have a written gender equality policy.²³³

In all Western Balkan countries and Türkiye, women journalists face discrimination, unequal pay and societal pressures which might hinder their capacity to report on corruption. Data from the Gender

Media Monitoring Project in **Montenegro** shows that women make up only 21 per cent of those who speak to, are read about or are being spoken of in newspapers, on television and on internet portals. Further challenges shared by female journalists include derogatory language, online harassment and sexual harassment, mostly via social media. A Council of Europe study on **Bosnia and Herzegovina** indicates that one in four citizens approves of violence against women journalists – a result of the long-term sexist reporting.²³⁴

Overall, there is a strong need for more gender-focused corruption reporting to highlight issues like sextortion,²³⁵ as both a form of corruption and of gender-based violence.²³⁶

Women's representation in traditional media is very often stereotypical. Thematic reporting on violence against women is mostly insufficient across the region. However, in **North Macedonia** in 2021, the Agency for Audio and Audiovisual Media Services adopted guidelines for monitoring reporting standards on gender-based violence. In **Türkiye**, concerns have arisen about media coverage of gender-based violence since the country's withdrawal from the Istanbul Convention.²³⁷

RECOMMENDATIONS TO STRENGTHEN CIVIL SOCIETY AND THE MEDIA

To EU actors

- + **Capacity building:** Provide CSOs with capacity-building training on taking legal measures against the unauthorised engagement of the state in their activities, through the EU Civil Society Facility and Media Programme.
WHO All countries.

To national governments and parliaments

- + **Civic space:** Review and amend laws currently being misused to silence critical voices in civil society and the media, and establish thorough monitoring of attacks and safety mechanisms. This includes – but is not limited to – defamation laws, strategic lawsuits against public participation (SLAPP) and foreign agent laws. In this regard, align laws with the new EU Anti-SLAPP Directive.
WHO All countries.

- + **Media ownership:** Improve transparency in the ownership of broadcast, print and online media, through appropriate and detailed public ownership registers. Similarly, budget funding for media should be awarded through public calls and transparent, outcome-based evaluations.
WHO All countries.

- + **Civil society engagement in law making:** Ensure the meaningful participation of experts and civil society in the law-making process and the EU accession process. Find proper mechanisms for the effective inclusion of civil society recommendations in the working groups of government-led policy preparation and negotiation chapters. These mechanisms should include at least:
 - All ministries conducting public consultations on draft laws and strategies and publishing the results on their websites.
 - Governments regularly reporting on and publishing the outcomes of working group discussions, including CSO demands, and the responses provided. The reports should be written and approved by all working group participants before publication.

WHO All countries.

- + **State funding:** Develop and publish clear, transparent and objective criteria for the distribution of state funding and the monitoring of financed projects. Train all ministries that provide grants to CSOs and the media in strategic planning, monitoring and evaluation.

WHO All countries.

To the justice sector

- + **Verbal and physical attacks:** Ensure attacks against journalists are properly prosecuted and closed in court, without delays.

WHO All countries.

To civil society and the media

- + **Gender-sensitivity:** Collaborate on investigations on sextortion, highlighting the issue and the consequences for the victims.

WHO All countries.

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ENDNOTES

- ¹ Regional Cooperation Council, Balkan Barometer 2023 Public Opinion, https://www.rcc.int/balkanbarometer/key_findings/2/.
- ² The complexity of Bosnia and Herzegovina – consisting of the state level, two entity levels (Federation of Bosnia and Herzegovina, and Republika Srpska) and one special administrative district (Brčko District) – can be traced back to the aftermath of the Bosnian War (1992-1995) and the Dayton Agreement, signed in 1995 in Dayton, Ohio, United States, to end the conflict and establish the framework for the country's governance. The Dayton Agreement created a unique political system for Bosnia and Herzegovina, characterised by a division of powers among three main ethnic groups: Bosniaks, Croats and Serbs.
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- ⁶ “Sexual extortion or ‘sextortion’ occurs when those entrusted with power use it to sexually exploit those dependent on that power. It is a gendered form of corruption that occurs in both developed and developing countries, affecting children and adults, vulnerable individuals (such as undocumented migrants crossing borders) and established professionals. While evidence shows that women are disproportionately targeted, men, transgender and gender non-conforming people are also affected.” Transparency International (2020), *Breaking the Silence around Sextortion: The links between power, sex and corruption*, <https://www.transparency.org/en/publications/breaking-the-silence-around-sextortion>.
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- ⁸ see the chapter on civil society and media in this report
- ⁹ Transparency International, *Corruption Perceptions Index*, <https://www.transparency.org/en/cpi/2023> [Accessed 4 February 2024].
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- ¹¹ OSCE (2023), International Election Observation Mission Republic of Serbia – Early Parliamentary Elections, 17 December 2023, Preliminary Conclusion, https://www.osce.org/files/f/documents/6/8/560650_0.pdf [Accessed 4 February 2024].
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²⁰ European Commission (2023b), State of play of EU-Türkiye political, economic and trade relations, [https://neighbourhood-enlargement.ec.europa.eu/document/download/16679fa1-cb73-4481-bc02-e3620b8c6dd3_en?filename=Joint Communication to the European Council - State of play of EU-Turkiye political, economic and trade relations.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/16679fa1-cb73-4481-bc02-e3620b8c6dd3_en?filename=Joint%20Communication%20to%20the%20European%20Council%20-%20State%20of%20play%20of%20EU-Turkiye%20political,%20economic%20and%20trade%20relations.pdf).

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⁵¹ The Savamala demolition in Serbia refers to a controversial incident that occurred in the Savamala district of Belgrade on the night of 24-25 April 2016. In the early morning hours, a group of masked individuals, believed to be private security personnel, demolished several buildings in Savamala. The demolition was carried out in a forceful and coordinated manner, and eyewitnesses reported that the perpetrators intimidated and obstructed citizens in the area. The demolished buildings were located in an area slated for the controversial Belgrade Waterfront development project, a large-scale urban renewal initiative led by the Serbian government in partnership with a United Arab Emirates-based company. The Savamala demolition sparked public outrage and accusations of corruption, as it raised concerns about the rule of law and the government's role in pushing forward the Belgrade Waterfront project. The Serbian government faced widespread criticism for its handling of the situation, and there were calls for an independent investigation into the incident. However, the investigation process faced delays and

controversy. See: Organized Crime and Corruption Reporting Project (2017), The Savamala Situation, <https://www.occrp.org/en/victimsofcorruption/the-savamala-situation> [Accessed 4 February 2024].

⁵² Indicator 3.1.4, 4.1.4 and 6.1.3 of IDM Albania (2024); Transparency International Serbia (2024).

⁵³ Indicator 3.2.4, 4.2.4 and 6.2.4 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁵⁴ Indicator 3.2.4, 4.2.4 and 6.2.4 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁵⁵ Indicator 3.2.4, 4.2.4 and 6.2.4 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁵⁶ Indicator 3.2.4, 4.2.4 and 6.2.4 of Kosovo Democratic Institute (2024).

⁵⁷ Indicator 3.2.4, 4.2.4 and 6.2.4 of IDM Albania (2024).

⁵⁸ Indicator 3.2.4, 4.2.4 and 6.2.4 of Transparency International BiH (2024).

⁵⁹ Indicator 3.2.4, 4.2.4 and 6.2.4 of MANS (2024).

⁶⁰ Indicator 3.2.4, 4.2.4 and 6.2.4 of Transparency International Serbia (2024).

⁶¹ Indicator 3.2.4, 4.2.4 and 6.2.4 of Transparency International Türkiye (2024).

⁶² Indicator 3.2.4, 4.2.4 and 6.2.4 of Transparency International Macedonia (2024).

⁶³ Indicator 3.3.2, 4.3.1 and 6.3.1 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁶⁴ Indicator 3.3.2, 4.3.1 and 6.3.1 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁶⁵ Indicator 3.3.2, 4.3.1 and 6.3.1 of IDM Albania (2024).

⁶⁶ Indicator 3.3.2, 4.3.1 and 6.3.1 of Transparency International BiH (2024).

⁶⁷ Indicator 3.3.2, 4.3.1 and 6.3.1 of Kosovo Democratic Institute (2024).

⁶⁸ EUROPOL (2020), New major interventions to block encrypted communications of criminal networks, <https://www.europol.europa.eu/media-press/newsroom/news/new-major-interventions-to-block-encrypted-communications-of-criminal-networks> [Accessed 4 February 2024].

⁶⁹ Libertas Press (2022), Miloš, Vesna and 15 accomplices – The entire indictment against the former president of the Supreme Court, her son and other members of the criminal group, <https://libertaspress.me/single-news/219> [Accessed 4 February 2024]; Radio Free Europe (2023), Veljović is suspected of ties to the Mojkovac tobacco clan, <https://www.slobodnaevropa.org/a/crna-gora-veselin-veljovic-mojkovac-fabrika-duvan-biznis/32518649.html> [Accessed 4 February 2024].

⁷⁰ Indicator 3.3.2, 4.3.1 and 6.3.1 of MANS (2024).

⁷¹ Indicator 3.3.2, 4.3.1 and 6.3.1 of Transparency International Macedonia (2024).

⁷² KRIK (2019), "The former director of "Serbian Railways" was acquitted of the charges that he damaged this company", <https://www.krik.rs/bivsi-direktor-zeleznica-osloboden-optuzbi-da-je-ostetio-ovo-preduzece/> [Accessed 22 May 2024]; KRIK (2021), "The former director of "Serbian Railways" was acquitted", <https://www.krik.rs/bivsi-direktor-zeleznica-pravosnazno-oslobodjen/> [Accessed 22 May 2024].

⁷³ Indicator 3.3.2, 4.3.1 and 6.3.1 of Transparency International Serbia (2024).

⁷⁴ Hürriyet (2021), Savcılık, eski bakan için TBMM'yi işaret etti, <https://www.hurriyet.com.tr/ekonomi/savcilik-eski-bakan-icin-tbmm-yi-isaret-etti-41955295> [Accessed 4 February 2024].

⁷⁵ Indicator 3.3.2, 4.3.1 and 6.3.1 of Transparency International Türkiye (2024).

⁷⁶ Indicator 3.2.7, 4.2.7 and 6.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁷⁷ See endnote 6.

⁷⁸ Indicator 3.2.7, 4.2.7 and 6.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁷⁹ Indicator 3.2.7, 4.2.7 and 6.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁸⁰ Indicator 3.2.7, 4.2.7 and 6.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁸¹ Indicator 11.2.5 and 11.2.6 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁸² Indicator 11.2.5 and 11.2.6 of Transparency International BiH (2024); MANS (2024).

⁸³ Indicator 11.2.5 and 11.2.6 of IDM Albania (2024); Transparency International Macedonia (2024).

⁸⁴ Indicator 11.2.5 and 11.2.6 of Transparency International BiH (2024); Kosovo Democratic Institute (2024); Transparency International Macedonia (2024).

⁸⁵ Transparency International (2014), Women's Participation in Politics and Corruption – A Review of Evidence.

⁸⁶ Indicator 11.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁸⁷ Indicator 11.2.7 of Transparency International Serbia (2024).

⁸⁸ Indicator 11.2.7 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁸⁹ Transparency International (2023), *Bringing the Receipts*, <https://www.transparency.org/en/publications/bringing-the-receipts-political-finance-transparency-in-the-western-balkans-and-t%C3%BCrkiye>.

⁹⁰ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁹¹ NOVA portal (2023), Vučičeva „kupovina glasova“ = više od 400 miliona evra zaduživanja za penzionere, majke, srednjoškolve... Samo ove godine, NOVA portal, <https://nova.rs/vesti/biznis/vuciceva-kupovina-glasova-vise-od-400-miliona-evra-zaduzivanja-za-penzionere-majke-srednjoskolce-samo-ove-godine/> [Accessed 4 February 2024]; The Fiscal Council's report presented a higher amount of €550 million. This figure includes expenses for unplanned and extraordinary increases in public-sector salaries, contributing to the higher total. In contrast, experts' estimations primarily rely on one-time payments, leading to differences in the figures presented. See: Fiscal Council (2023), Notes with the Opinion on the Draft Fiscal Strategy for 2024 with Projections for 2025 and 2026, p.4, https://www.fiskalnissavet.rs/doc/FS_%20Napomene_uz_Misljenje_na_Nacrt_FS_2024-2026_090623.pdf.

⁹² Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024); Transparency International Serbia (2023), Monitoring 2023 elections – Summary of preliminary findings and recommendations, p.4, https://www.transparentnost.org.rs/images/dokumenti_uz_vesti/TS_Monitoring_report_-_elections_2023_-_summary_updated.pdf.

⁹³ This information is available in some cases, but it depends on the political party.

⁹⁴ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁹⁵ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of Transparency International BiH (2024); Kosovo Democratic Institute (2024); Transparency International Serbia (2024).

⁹⁶ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁹⁷ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁹⁸ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

⁹⁹ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Türkiye (2024).

¹⁰⁰ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁰¹ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁰² Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of Transparency International BiH (2024); Transparency International Serbia (2024).

¹⁰³ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁰⁴ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁰⁵ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International Serbia (2024).

¹⁰⁶ The following section contains detailed descriptions and justification for the information provided in Table 6.1: Overview of political finance oversight institutions for each country:

- Albania: The election monitoring body (EMB – in Albania called the Central Election Commission, CEC) is legally obliged to oversee and audit political parties' financing and their expenditures, which it outsources to independent certified auditors. Following the 2021 elections, the CEC contracted 17 accounting experts to audit 32 parties – fewer than the minimum of 20 experts required by law. The CEC also lacks independence. The July 2020 amendments to the Electoral Code sought to depoliticise it, through changes that provide for sharing the nomination of commissioners. The governing party nominates the State Election Commissioner and three commissioners to the Regulatory Commission (RC) and the Commission of Sanctions and Complaints (CSC) respectively, while the opposition party nominates the Deputy Election Commissioner and two commissioners to the RC and CSC respectively. However, this means that commissioners remain divided along political lines. Sanctions are only partly dissuasive. For example, the fine for violations of the maximum expense limit by an electoral subject is only 5 million Albanian Lek (€49,500), while a party risks suspension of public funding for a maximum of five years for obstructing or failing to cooperate with the CEC auditor. For more information, see: Indicator 7.1.1, 7.1.2 and 7.1.3 of IDM Albania (2024); Electoral Code of the Republic of Albania, 2020, Article 173.
- Bosnia and Herzegovina (BiH): The EMB (in BiH called the Central Election Commission, CEC) has the authority to monitor and audit income, but only limited authority to audit campaign expenditure. It has faced longstanding challenges in maintaining an adequate workforce, particularly in the department responsible for auditing political parties' financial reports, which currently functions with just four auditors, while being tasked with auditing reports from over 100 political parties. Various positions outlined in the CEC Rulebook on Internal Organisation remain vacant. The CEC has sought approval from the Council of Ministers for amendments to its internal structure, but these are still pending. Furthermore, it relies heavily on donations from international donors for essential equipment, archives and software for processing and reviewing financial reports, managing elections and coordinating with local election commissions and committees, as well as training and capacity building for its permanent and temporary staff. The CEC Audit Department lacks the necessary capacity, resulting in audit reports being published more than two years after the submission of financial reports. There are no sanctions defined for not publishing the reports on time,

but there are sanctions for other breaches of the law. However, the fines given to political parties for violations of the Law on Financing of Political Parties are imposed with delays, due to delays in undertaking audits, while some political parties are allowed to pay the fines via multiple instalments. For more information, see GRECO: *Second Addendum to the Second Compliance Report on Bosnia and Herzegovina – Third Evaluation Round*, GrecoRC3(2022), <https://rm.coe.int/third-evaluation-round-incriminations-ets-173-and-191-gpc-2-transparen/1680a7acc3>; Indicator 7.1.1, 7.1.2, 7.1.3 of Transparency International BiH (2024); Law on Financing of Political Parties, Article 19.

- Kosovo: Recent legal changes have reinstated responsibility for overseeing the finances of political entities to the EMB (in Kosovo called the Central Election Commission, CEC), specifically the Office for Registration, Certification and Financial Control of Political Entities (the Office). This includes the selection of auditors for annual financial reports and election campaigns through an open public competition. In terms of resources, the legislation stipulates a minimum of 10 staff members for the office and a budget of approximately €300,000 for auditing, which is deemed adequate. However, the issue lies in the fact that the recruitment processes have not been finalised. Despite recent legal revisions granting the Office a degree of independence, there remains a potential, albeit nominal, chance of political intervention. Initially, the CEC, operating as a collective body, formulated the regulation outlining the specifics and processes for selecting the Office's new director. Conversely, the composition of the recruitment panel, comprising leaders from independent institutions elected by the Assembly of Kosovo, could be perceived as a potential avenue for political influence in the election of the director. For more information, see: Indicators 7.1.1, 7.1.2, and 7.1.3 of Kosovo Democratic Institute (2024). Kosovo Democratic Institute, *Political Financing in Kosovo: What After the Recent Legal Changes?*, p.15, <https://kdi-kosova.org/wp-content/uploads/2022/12/47-Raport-Political-Financing-Kosovo-Eng-02.pdf>.
- North Macedonia: The Supreme Audit Institution (SAI) is tasked with auditing both annual and electoral financial reports, and taking action if irregularities are identified. The Anti-Corruption Agency (ACA, in North Macedonia called State Commission for the Prevention of Corruption, SCPC) has the authority to launch an examination into the financing of a political party, either independently or in response to a complaint from an election campaign organiser or accredited observers, particularly when irregularities or suspicions of unlawful campaign financing arise. Regarding political finances, the CEC is only responsible for publishing political parties' financial reports. The SAI has adequate financial and human resources to carry out its work and meet its goals. For more information, see Indicators 9.1.2, 9.1.3, 10.1.2 and 10.1.4 of Transparency International North Macedonia (2024); State Audit Office (2020), Rulebook on systematisation of staff positions: https://dzt.mk/sites/default/files/2021-01/3_Pravilnik_za_sistematizacija_na_rabotnite_mesta_vo_DZR_2021.pdf; Macedonian State Commission for the Prevention of Corruption, *Annual Reports for the Work of SCPC for the years 2019, 2020, 2021 and 2022*: <https://dsk.mk/mk/godisni-izvestaji/>.
- Montenegro: Political parties are required to submit consolidated annual reports and other relevant data to the SAI and the ACA (in Montenegro called Agency for the Prevention of Corruption, APC). Since the Law on Political Financing of Political Entities and Election Campaigns changed in 2020, the SAI is obliged to audit all parliamentary political parties within four years, instead of auditing them all on an annual basis. The APC is in charge of on-site controls of political parties' finances related to campaign expenditures. In 2022, the APC was unable to fill 28 per cent of the positions required by the 2021 Act on the Internal Structure and Systematisation of the APC. In the department for implementing control measures for financing of political entities and election campaigns, there are 18 staff (a third of the 54 required positions), and up to 20 staff working during election periods. The APC lacks independence, as shown by several inconsistent decisions in 2020 related to transparency of election campaign spending – in particular, for advertisements in media outlets registered in Serbia. This constitutes a concerning loophole allowing foreign influence. In addition, the 2023 European Commission report on Montenegro notes the need to further ensure the independence, accountability, impartiality and proactivity of the APC. The SAI operates freely from other actors and its activities are non-partisan, i.e. they demonstrate no signs of bias, though there are allegations of political appointments in the SAI Senate, because some members have been in high-ranking positions in a political party prior to appointment. For more information, see: Indicators 9.1.2, 9.1.3, 10.1.2 and 10.1.4 of MANS (2024); [Publication in mid 2024]. Montenegro Agency for Prevention of Corruption, Act on Internal Structure and Systematisation of the APC from 2021, www.antikorupcija.me/media/documents/Pravilnik_o_unutra%C5%A1njoj_organizaciji_i_sistematizaciji_radnih_mjesta_u_ASK_2021..pdf; Montenegro Agency for Prevention of Corruption, *Annual Report for 2022*, www.antikorupcija.me/media/documents/lzvještaj_o_rad_u_ASK_u_2022..pdf; GRECO, October 2022, Fifth evaluation round. *Preventing corruption and promoting integrity in central governments (top executive functions) and law enforcement agencies*. Evaluation report, <https://rm.coe.int/fifth-evaluation-round-preventing-corruption-and-promoting-integrity-i/1680a8a106>. Montenegro (EC 2023. Montenegro 2023 report), https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_694_Montenegro_report.pdf.
- Serbia: The ACA (in Serbia called the Agency for the Prevention of Corruption, APC) is mandated to check the accuracy of reported incomes and expenditures in annual and election campaign finance reports, in accordance with the plan

adopted by the APC. Staffing is only at about 60 per cent of the designated level, which indicates that the agency does not have adequate resources to achieve its goals in practice across all its competencies. In addition, it lacks sufficient office space, as identified in its 2017 Annual Report. The APC's independence has been called into question on several occasions in connection with the selection of its directors, their resignations and decisions. The former director, Dragan Sikimić, was elected on 17 January 2018, after the agency spent almost a year without a director and several years with an incomplete board. Sikimić's independence has been questioned, as he was a member of the ruling SNS party until the day of his election to office, as well as a donor to the party and its nominee for the local Election Commission (a working body of the Republic Election Commission, tasked with implementing presidential elections announced in 2017). For more information, see: Indicator 10.1.2 and 10.1.4 of Transparency International Serbia (2024); Law on Prevention of Corruption, Official Gazette of the Republic of Serbia no 35/2019, 88/2019, 11/2021 – authentic interpretation, 94/2021 and 14/2022; Law on Financing Political Activities; Official Gazette of the Republic of Serbia no 43/11 (amended 2019); ACA Serbia, *Report on the Control of the Costs of the Election Campaign in 2020*, www.acas.rs/storage/page_files/lzve%C5%A1taj%20o%20kontrolni%20finansiranja%20politi%C4%8Dkih%20aktivnosti%20za%202020.%20godinu%20-%20Izve%C5%A1taj%20o%20kontrolni%20tro%C5%A1kova%20izborne%20kampanje%20u%202020.%20godini.pdf; Law on Financing of Political Activities, article 40 (criminal offence), articles 41-42 (misdemeanour of political party), article 43 (misdemeanour of other legal entities and natural persons).

- Türkiye: Presidential candidates must submit campaign finance reports to the EMB (in Türkiye called the State Election Commission), which audits them with the help of the SAI (in Türkiye called Court of Accounts, TCA). The results are not publicly disclosed. Political parties declare campaign funds in annual financial reports submitted to the Constitutional Court, which conducts audits in collaboration with the TCA. The independence of the SEC was brought into question during the last election. In recent years, its decisions, especially in favour of the ruling party and against the opposition party, have led to criticism that it is under the political influence of the government. Additionally, in recent years, there have been numerous instances of suspected political interference in the selection, appointment and removal of directors, members and staff within the TCA, along with allegations of report censorship, undermining the court's independence and political neutrality. The recruitment processes for the TCA president, members and auditors are at risk of political influence due to election procedures, particularly during the Parliamentary Plan and Budget Committee's decision making in the second stage of the TCA member election process. Concerns have been raised by opposition parties regarding the committee's structure, as a significant majority of its members belong to the People's Alliance party (established in February 2018 between the ruling Justice and Development Party and the former opposition Nationalist Movement Party). Criticism has been directed at the election of both the previous TCA president, Seyit Ahmet Baş (2016-2021) and the current president, Metin Yeners (since 2021), due to their alleged close ties with the ruling party and its ministers. Sanctions are foreseen for breaches of political party law, but not for non-reporting. For more information, see: Indicator 7.1.1, 7.1.3, 9.1.1 and 9.1.3 of Transparency International Türkiye (2024); Law on Political Parties, Article 76.

¹⁰⁷ International Foundation for Electoral Systems, FORT – Political Finance Oversight Database, <https://www.ifes.org/FORT>.

¹⁰⁸ The sanctions include monetary fines, forfeiture and loss of public funding. See Law on Financing Political Parties, 2018, Articles 20, 28, 29 and 32, <https://sds.org.mk/wp-content/uploads/2022/03/zakon-za-finansiranje-na-politickite-partii.pdf>.

¹⁰⁹ IFES, FORT database, based on the Law on Prevention of Corruption and Conflicts of Interest, and direct input from the ACA.

¹¹⁰ Interview with an official of the Office for Registration, Certification and Financial Control of Political Entities, February 2023.

¹¹¹ Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of Transparency International BiH (2024); Kosovo Democratic Institute (2024) Transparency International Macedonia (2024); Transparency International Türkiye (2024).

¹¹² Indicator 11.2.1-11.2.4, 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); MANS (2024).

¹¹³ Voice of America (2022), "USA: Russia secretly financed DF in Montenegro and Dodik in BiH, Vijesti", <https://en.vijesti.me/news/politics/621482/now-russia-secretly-financed-df-in-montenegro-and-dodika-in-bih> [accessed on 23 October 2023].

¹¹⁴ BBC (2022), "Russia covertly spent \$300m to meddle abroad – US", www.bbc.com/news/world-us-canada-62897570 [accessed on 23 October 2023].

¹¹⁵ National Business Center, *Register of Beneficial Owners*, <https://qkb.gov.al/search/search-in-the-register-of-beneficial-owners-rbo/search-reporting-subject/> [accessed on 24 May 2024].

¹¹⁶ Central Registry of the Republic of North Macedonia, Registration of the beneficial owner of an entity, <https://crm.com.mk/en/services/perform-a-registration-or-complete-a-task/registration-of-the-beneficial-owner-of-an-entity/-registration-of-the-beneficial-owner-of-an-entity> [accessed on 22 November 2023].

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¹⁶⁴ Indicator 5.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

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¹⁶⁶ Indicator 1.2.2, 2.2.2, 3.2.2, 4.2.2, 5.2.1, 5.2.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

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¹⁸⁰ Indicator 10.1.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁸¹ Indicator 7.1.1, 8.1.1, 9.1.1 and 10.1.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

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¹⁸⁵ Indicator 8.1.1 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

¹⁸⁶ Indicator 10.1.3 and 10.1.4 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

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- ²⁰⁴ Indicator 7.3.1 and 7.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²⁰⁵ Indicator 8.3.1 and 8.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²⁰⁶ "GONGOs are government-sponsored non-governmental organisations. Behind this [...] lies an important and growing global trend that deserves more scrutiny: governments funding and controlling nongovernmental organizations (NGOs), often stealthily." See: Foreign Policy (2009), "What is a GONGO?" <https://foreignpolicy.com/2009/10/13/what-is-a-gongo/> [Accessed 4 February 2024].
- ²⁰⁷ Indicator 12.1.4 and 13.1.4 of IDM Albania (2024); Transparency International BiH (2024); MANS (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²⁰⁸ Indicator 12.1.4 and 13.1.4 of IDM Albania (2024); Transparency International BiH (2024); Transparency International Türkiye (2024).
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- ²¹⁴ Balkan Insights (2023), Montenegro Seek FBI's Help on Journalist's Unsolved Murder, <https://balkaninsight.com/2023/07/19/montenegro-seek-fbis-help-on-journalists-unsolved-murder/> [Accessed 4 February 2024]; Montenegro Independent News Agency (2019), Progress not expected in Jovanović and Softić cases, <https://mina.news/english-news/progress-not-expected-in-jovanovic-and-softic-cases/> [Accessed 4 February 2024].
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- ²¹⁶ Indicator 12.1.4 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
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- ²²⁵ Indicator 12.2.3 and 12.2.4 of IDM Albania (2024); Transparency International BiH (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²²⁶ Indicator 12.2.3 and 12.2.4 of Kosovo Democratic Institute (2024); MANS (2024).
- ²²⁷ Key advocacy successes of CSOs related to anti-corruption work: Civil society in Albania won notable successes in litigation against concessionary contracts for building hydropower plants in Vjosa and Zall-Gjoçajt. In 2021, Transparency International BiH found that there was insufficient institutional capacity to address requests under the Law on Freedom of Access to Information in Bosnia and Herzegovina. In response, the Ministry of Justice proposed a new law, but it diverged significantly from EU standards. CSOs in Kosovo have successfully opposed detrimental amendments to the Draft Law on NGOs and the Draft Law on Financing of Political Entities. In Montenegro, civil society also spearheaded a campaign, seeking a change in the Special Prosecutor's Office due to its political affiliations with the former ruling party and the former President of Montenegro and lack of action against high-level corruption. This advocacy effort led to subsequent reforms in 2022 and 2023 within the Special Prosecutor Office and Prosecution Council. In 2022, CSOs in Serbia successfully mobilised to monitor the Serbian Interior Ministry's attempt to pass a new Law on Internal Affairs. This alarmed the public, leading the government to withdraw the draft law from parliamentary procedure. The example highlights that open and public confrontation with the government is often the only option for civil society in Serbia. See: Indicator 13.3.1 and 13.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²²⁸ Indicator 13.3.1 and 13.3.2 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²²⁹ Indicator 13.3.1 and 13.3.2 of MANS (2024).
- ²³⁰ Indicator 13.3.1 and 13.3.2 of IDM Albania (2024); Transparency International BiH (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).
- ²³¹ Key examples of corruption cases uncovered by the media: In Albania, high-profile corruption investigations include cases such as that of the waste incinerator, independently disclosed by freelance journalist Artan Rama and BIRN journalists, in which the former Minister of the Environment, a former Member of Parliament and several business figures are charged with alleged abuse of office, corruption and money laundering. In Bosnia and Herzegovina, despite challenges, the media has been instrumental in unveiling major corruption scandals. Unfortunately, only a limited number of these revelations prompt institutional responses or lead to legal outcomes. In Kosovo, journalists uncovered a significant corruption case involving the construction of hotels and villas in Brezovica, which has resulted in over 100 arrests since December 2021. The scheme involved municipal officials receiving bribes to overlook unregulated construction within a protected zone. In Montenegro in 2021, MANS' Investigative Center revealed a complex network of offshore companies and trusts established by the then-President of Montenegro, while in 2022, Libertas uncovered evidence that suggests that Vesna Medenica, the then-President of the Supreme Court, was aware of her son's illegal activities in cigarette smuggling and drug trafficking, providing him with protection. In North Macedonia, in July 2022, a report by the Investigative Reporting Lab on a hospital fire in which 14 people died, led the public prosecutor's office to launch a case, and unveiled a labyrinth of mistakes, made both by ordinary officials and high-profile people in politics, business and the judiciary. In Serbia in 2023, recordings obtained by BIRN revealed that Nenad Milanović, head of the office of the mayor of Belgrade, allegedly offered the Turkish company Kentkart a contract via a rigged tender if they agreed to the mutual termination of their existing contract for the ticket collection system in Belgrade's public transport.

Recent corruption investigations in Türkiye also include reports on a land transfer involving sons of AKP members, demonstrating the media's active role in scrutinising possible corruption. See: Indicator 12.3.1-12.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

²³² Indicator 12.3.1-12.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

²³³ Indicator 12.3.4 and 13.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

²³⁴ Indicator 12.3.4 and 13.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

²³⁵ See endnote 6.

²³⁶ Indicator 12.3.4 and 13.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

²³⁷ Indicator 12.3.4 and 13.3.3 of IDM Albania (2024); Transparency International BiH (2024); Kosovo Democratic Institute (2024); MANS (2024); Transparency International Macedonia (2024); Transparency International Serbia (2024); Transparency International Türkiye (2024).

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