



TRANSPARENCY
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SLOVAKIA

ACCESS TO INFORMATION IN EUROPEAN CAPITAL CITIES

Pilot comparison study

Transparency International is a global movement with one vision: a world in which government, business, civil society and the daily lives of people are free of corruption. Through more than 100 chapters worldwide and an international secretariat in Berlin, we are leading the fight against corruption to turn this vision into reality.

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Every effort has been made to verify the accuracy of the information contained in this report. All information was believed to be correct as of July 2019. Nevertheless, Transparency International cannot accept responsibility for the consequences of its use for other purposes or in other contexts.

Responsibility for the information and views expressed in the report therein lies entirely with the researchers from Transparency International Slovakia.

Should you be interested in the project, or in funding the detailed Europe-wide city rankings, please contact us at tis@transparency.sk.

INTRODUCTION

For the majority of people, local government is the closest connection with politics they have. Local politicians hold tremendous power in their hands, influencing the development of the cities, road conditions, quality of schools, environment or even the amount of money people pay in the form of local taxes. Apart from having many competences, local governments also possess significant levels of financial resources. Citizens of European capital cities face various challenges in accessing the information about how their local politicians work, get paid, spend taxpayer money or who is winning contracts at city halls.

A growing number of European Transparency International (TI) chapters conduct regular transparency assessments of the cities at national level. They often serve as a useful tool in motivating and persuading institutions to make their decision-making more visible to public and more open to public participation, while, at the same time, enhancing accountability of elected officials. The idea was to create the pilot comparison of transparency of European capital cities using a limited number of indicators. The overall aim was also to strengthen cooperation among European TI chapters by comparing European capital cities in order **to better understand differences between countries, recognise best practices, and ultimately to improve citizens' access to information and decision-making.**

In the first stage of developing this comparison (October – December 2018), the consortium of TI chapters worked with 26 European capitals. TI representatives from 20 countries participated in a meeting in Bratislava in September 2018 in order to draft the methodology. As a consensus, a set of indicators was created. This was shared with other European chapters, some of whom joined later. It was mostly representatives of TI chapters who collected the data and evaluated the cities. In the case of a few exceptions (London and Madrid), TI Slovakia contacted external contractors to collect and assess the data.

Together we agreed upon – and later measured – 14 carefully chosen indicators. They measure access to information of how cities make decisions, how money is being spent, how transparent they are in public procurement, how they communicate the content and process of the council meetings or what are the ethics rules for the elected representatives.

Such a comparison will always have its difficulties. Some practices of cities depend on national legislation rather than on their own effort. Some cities have much more limited powers than the others. Countries with more corruption will find it more important to have formal transparency laws than those who manage quite well with their informal yet fair practices.

Our study then compares what access to information about their cities the citizens of a capital have, but not necessarily how transparent the city administration is of their own accord (nor do the results imply anything about levels of corruption in those cities). And while more transparency leads to less corruption in the long term, there is no guarantee of such relationship in every aspect and time. Nevertheless, we find this exercise useful as it compares best practice across Europe and offers motivation to improve citizens' rights, be it at local or national level.

We certainly hope to conduct a much larger assessment of access to information of European capitals in the near future. The focus can be extended not only to other indicators (recruitment, grant-giving, sales of property) but also to their quality. It is still common for cities to publish their data in formats that are hard to find, sort and work with in general.

You can find more about the methodology of this research at the end of this document.

RESULTS

Citizens of European capital cities face various challenges in accessing the information about how their local politicians work, get paid, spend taxpayer money or who is winning contracts at city halls.

On the one hand, citizens have very good access to information about city budgets, procurement deals, councillors' decisions and contact information. On the other hand, only in minority of European capitals do people have access to city contracts, mayors and councillors' salaries and their working schedules.

Surprisingly, despite the legislation in place in most of the countries, it is far from easy for citizens to receive an answer to a request for various pieces of information. In half of the cities it took more than three weeks to receive a reply to inquiries about the mayor's salary or ongoing telecom contracts with the city hall. Only 40% of the cities provided the information on the contracts.

Eastern European cities performed better than their counterparts from older democracies. This can be attributed to their newish transparency laws as well as recent pressure to publish more information given the unsatisfactory levels of corruption in their home countries. Pristina in Kosovo has done very well in most of our indicators, with Prague not far behind. However, post-communist countries also have the worst performers. Belgrade and Yerevan did especially badly in our study.

Given the relatively small number of indicators, we decided against creating a full ranking. Instead we put the cities into three broad categories:

- Green (with a score of at least 75% of maximum points)
- Orange (50–74.9% points)
- Red (below 50% of points)



What is important is that there was not really any city, which would dominate in all categories and serve as a best practice for other cities. There are cities which have not performed well overall but, in some indicators, they serve as a best practice. This supports the idea of our study that cross-European comparison encourages identifying and sharing good practices.

The full result of the comparison across capital cities can be seen in the table on the next page.

Question	Amsterdam Netherlands	Athens Greece	Belgrade Serbia	Berlin Germany	Bern Switzerland	Bratislava Slovakia	Bucharest Romania	Chisinau Moldova	Kiiv Ukraine	Lisbon Portugal	London United Kingdom	Ljubljana Slovenia	Madrid Spain	Moscow Russia	Oslo Norway	Prague Czechia	Pristina Kosovo	Riga Latvia	Rome Italy	Sarajevo Bosnia and Herzegovina	Skopje North Macedonia	Sofia Bulgaria	Stockholm Sweden	Tallinn Estonia	Vilnius Lithuania	Yerevan Armenia	Yes	Partially	No	Success rate (%)
Are the Notices of public procurement calls available on the City Hall's website? (the item procured, deadline, bidding conditions).	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	25	1	0	98.1
Is the 2018 budget available on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	24	1	1	94.2
Is the final budget report (budget execution) for 2017 available on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	20	4	2	84.6	
Are the minutes from the City Council sessions published on the City Hall website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	20	2	4	80.8	
Are the results of the City Hall's public procurements in 2018 available to the public? (the name of winner, price, date, the item procured)	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	19	1	6	76.9	
Are the names and contact details (at least either phone or the email addresses) of the City Council members published on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	16	3	7	67.3	
Did the city provide information on Mayor's and individual councillors' total pay for 2017?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	12	3	9	56.3	
Is the Code of Conduct of the elected city representatives on the website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	12	5	9	55.8	
Does the City Hall publish its contracts on its website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	9	8	9	50.0	
Are the individual voting records from the City Council sessions published on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	11	3	12	48.1	
Did the city hall provide on request contracts for its current supplier of telecom and internet services?	●	●	●	●	n/a	●	●	●	●	●	●	●	n/a	●	●	●	●	●	●	●	●	●	●	●	n/a	10	2	11	47.8	
Is the city Mayor's working schedule (meetings calendar) published on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	8	2	16	34.6	
Are the current asset declarations of the Mayor and the City Council members published on the City Hall's website?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	5	4	17	26.9	
Is the current lobbying register of the Mayor and the City Council members available to the public?	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	●	1	0	25	3.8	

DETAILED RESULTS

The assessment of each indicator with good and bad practices identified are also described in detail below.

Indicator 1:

Are the notices of public procurement calls available on the city hall's website? (the item procured, deadline, bidding conditions)

To what extent are the options to participate in public tenders open?

Results:



All of the assessed capital cities publish their procurement calls on their website. If not, they publish a direct web link on the website of the city, which directs to an external website where this information is available. The only exception was Stockholm.

A good example of a public procurement website is one which offers its users a well-organised list, through which they can search by the keywords, the amount of money, date, etc. In addition, every call for tenders should include detailed and clearly defined information and criteria about the calls and procured goods or services (ideally in a form that can be copied and downloaded). Furthermore, the system should be accessible to everyone, and should not limit access only to companies and registered users.

On the other hand, a bad example is either “hidden” or hard-to-access links to an external website of public procurement, an unorganised list of offers, without a search or filter option, or offers in the form of scans located in a disordered archive.

Vilnius has its offers publicly placed on their easy-to-search website. For a more detailed description, you can find it on the webpage of the centralised register:

Vilnius.lt - Public Procurement

Procurement

Purchase number	<input type="text"/>
Name	<input type="text"/>
Purchase method	Choose purchase methods ...
Date of opening of envelopes	Data nuo <input type="text"/> <input type="text"/>
	Data iki <input type="text"/> <input type="text"/>

Search Clear

Kyiv does not issue the data on the website of the city but directs visitors to a public web page with a list and details on the online bidding of tenders. The site looks well-organised and user-friendly:

Electricity code 021: 2015 - 09310000-5 (electric energy)

Procurement: UA-2018-11-07-001705-b / [ProZorro](#) / [DoZorro](#)

Period of refinement It's over	Offer submission period It's over	Auction
from 07-11-2018, 19:16 to 13-11-2018, 08:30	from 07-11-2018, 19:16 to 23-11-2018, 08:30	The auction did not take place

Click the button to get signature information

The deadline for filing claims / complaints on the terms of purchase has been completed - 18-11-2018 at 23:00

Uncontrolled purchase.
according to tender documentation
Purchase ID: 4e7d30112dd24281b6f89f27bead4d99

OPEN BIDDING

Status: **PURCHASE DID NOT TAKE PLACE**

Budget: 150 000.00 UAH (including VAT)

Customer: Holosiivsky district state administration in Kyiv

USREOU: 37308812

Website: <http://golos.kievcity.gov.ua/>

Contact person: Romanenko Svetlana Vitalievna

Phone: 380442816607

E-mail: ekonomdepgrda@golosiiv.gov.ua

Location: 03039, Ukraine, Kiev region, Kiev, Holosiivsky ave., 42

Get advice for a victory

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PURCHASE DETAILS QUESTION REQUIREMENTS / COMPLAINTS DOZORRO DASU

Bratislava, Prague, Kyiv, Amsterdam, and Sofia each have a link to an external webpage (Public Procurement Office) attached on their website. However, in the case of Bratislava and Tallinn, this link could be placed on a much more visible place. Tallinn also offers an option to search in numerous categories. The number of categories provided seems to be sufficient. There is also a small infographic about the amount of money procured, number of firms and entrepreneurs who took part in procurement, etc. in a given year.

Belgrade has its own system of publishing offers on their website as does Riga and Oslo which also have an option to search and filter through them. Berlin only offers an option of searching – not filtering in their database. Pristina, on the other hand, allows users neither to search nor filter through the offers. They only publish the offers in a tremendously long document.

Although Bucharest publishes its opportunities for tenders, they are located on a very disorganised and not user-friendly website. It is possible to find particular scans, however, a system for organising the data as well as a filter function (such as filtering by date, amount or region) are both missing. The information is provided although at first glance it looks as if only for the sake of having it there. This almost seems like a false effort to be transparent.

Athens publishes their procurement offers in the form of a calendar. In the calendar form of the procurement calls, the interested parties, can only click on the calls and see all the details that they need (deadlines, bidding conditions, etc.), accompanied by the necessary documentation in a pdf form. All the procurement calls can also be found on the official site for the procurements of the public sector, at <https://www.diaivgeia.gov.gr/>.

Stockholm provides an organised system of offers on their own website. However, only firms can access more detailed information by registering for free on the platform TendSign.

Indicator 2:

Are the results of the city hall's public procurements in 2018 available to the public? (the name of the winner, price, date, the item procured)

Can the public check who won the tenders and where how much money is going?

Results:



Most of the assessed capital cities (20) publish the results of the public procurement on the website of the city. Alternatively, they direct visitors to an external link where the information is available. There are 8 cities which do not publish the information. In the case of Riga and Latvia only part of the information is available on the city websites.

From the cities where public procurement results are published, several use a more or less transparent system of filterable results (by date, amount, keyword, etc.), e.g. [Vilnius](#), [Prague](#).

Other cities publish the results of the procurement in a less transparent and non-filterable form – e.g. [Sofia](#) publishes a list of contracts with the possibility to download scanned documents similar to [Skopje](#), whereas the systems applied in [Yerevan](#) or [Rome](#) appear to be less user-friendly.

It makes a big difference whether cities only formally meet the public procurement criteria, or they also create user-friendly platforms allowing citizens to quickly search and filter in the online archive.

In the case of [Riga](#), the tender types, tender calls and deadlines are available online and for some procurements (when it is regulated by Public Procurement Law) the contract prices are shown as well. However, most of the information – including contracts, winners, overall prices, amendments etc. – can be accessed only after submitting an information request.

Some cities only publish procurement results above a certain financial threshold – e.g. Bern is over the limit of EUR 90,000 (CHF 100,000). Similarly, in [Berlin](#) there is a limit of EUR 15,000.

The city of Amsterdam allows only companies to enter the public procurement system – the general public is excluded from this option. Similarly, Stockholm allows only registered tenderers (companies) to enter the public procurement website TendSign – for each particular tender. However, for any other interested person, the register is physically available.

Indicator 3:

Is the 2018 budget available on the city hall's website?

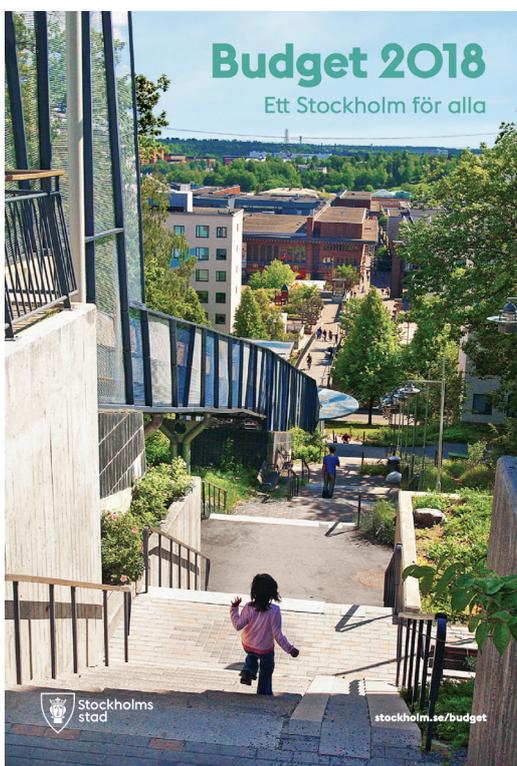
Where is the city getting money from and how is it spending it?

Results:



The indicator – whether the city's budget is posted on its web – was measured at the end of 2018. So, it could be assumed that most of the city budgets would be available on the web. This theory was confirmed – only Sarajevo and Yerevan did not meet the criteria of this indicator.

The quality of the published budgets varies. Some cities are clearly trying to communicate with the citizens through the budget – to explain on what, how much, how and why the city finances are spent. Even at first glance, the complicated world of numbers and charts can be presented in a form that can be understood by ordinary citizens. An example of good practice is Stockholm, which has the [city budget](#) in the form of an analytical document and is published together with the annual reports:



It is a good practice to publish budget data in downloadable and editable charts as is the case in Pristina or in [Oslo](#) (open dataset format).

Some cities publish very large and detailed budgets. [Berlin](#) has a budget divided into 14 volumes – by area. [Ljubljana](#) publishes a relatively technical budget of 472 pages. Publishing shortened budget forms would be a good alternative.

Several cities have published the budget in a hard-to-read, non-copiable format or in the format of scanned documents. Many of these budgets are very technical – without any description and further analysis – they are hard to understand for ordinary citizens ([Kyiv](#), [Bratislava](#), [Prague](#), [Skopje](#)). Although [Riga](#) and [Belgrade](#) publish their budgets, it is almost impossible to find them on the official city websites – it is easier to access them via internet search engines.

It appears some cities do not even hide the fact that they might consider the publication of their budget as a necessary evil, which would not require much of their employees' time – [Chisinau](#) publishes budget scans with reversed or incomplete pages; [Yerevan](#) in a non-readable font (but there is a readable [summary](#) of the approved budget in Armenian), The budgets of [Rome](#), [Bucharest](#) and [Sofia](#) also do not look user-friendly.

Ljubljana prepared a report consisting of 1048 pages and divided into several chapters. However, it is quite technical. A shorter and more understandable abstract would help an ordinary citizen to understand how the city is spending its budget.

Several reports are formally complete and also extensive, but they are hard to read and understand for ordinary citizens. Bucharest is one such example. Sofia published a lot of data in a number of documents that are difficult to understand for an ordinary citizen. There is no analysis of budget spending nor justification (and data) of the difference between planned and actual drawdown.

This is however the case of several cities – publishing only numbers and tables as a budget report, without further analysis. Examples are Pristina, Skopje and Lisbon (although the report was well-divided into chapters and very extensive).

Sarajevo published a budget report only from the first 6 months of the year. The exceptions include also Bratislava, which in the surveyed period (September 2018 and March 2019) only published a draft of the final budget report from June 2018 on its official web page.

Indicator 5:

Does the city hall publish its contracts on its website?

We were searching for contracting at a transaction level, including full contract text (not only procurement, but sales, grants, etc., too.)

Results:



Nine cities publishes contracts on their website to a sufficient extent and in a good format. Eight cities have them only partially accessible (not all contracts are available, e.g. public procurement only from a certain value) and ten cities do not publish them at all or only in an inadequate scope or of a low quality.

Kyiv publishes the contracts on an external website e-tender. Tallinn restricts access to some of the contracts based on the Law on Public Information but always publishes the general information in the official Document Registry or on a separate website for grants and transactions. Bratislava publishes contracts on a central register of contracts, as does Prague. Bratislava has a well-arranged system of categorisation, but it lacks a system of filtering and searching by keywords, periods or reference number. In the case of Prague, it is the other way around. Although Pristina or Rome both publish contracts, it is not possible to sort, filter or search data by keywords.

Some cities, such as Yerevan, Ljubljana, Vilnius, Sofia or Lisbon publish public procurement contracts, but some commercial contracts or grant contracts are not published.

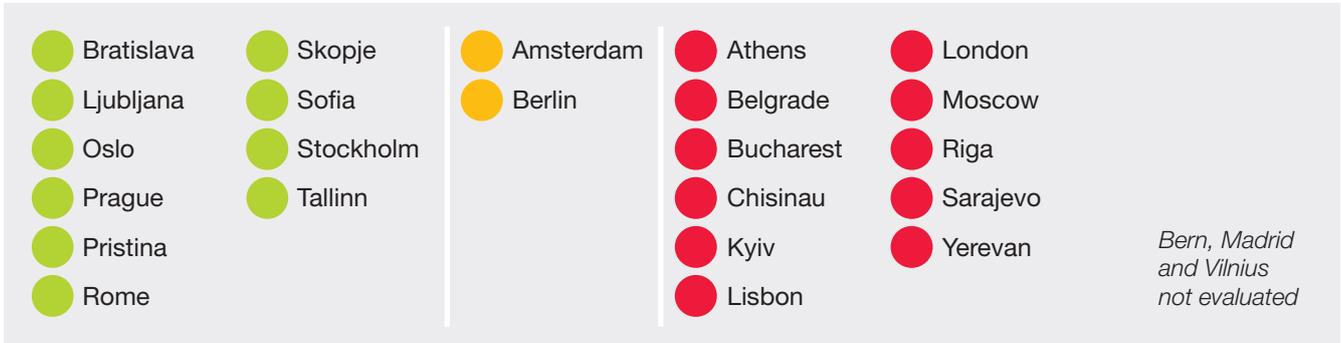
Several cities do not publish any contracts on their websites at all. For example, Skopje only publishes the city's strategy, budget, financial statements and, to some extent, information on international projects in which the city was involved – but without publishing contracts and other documentation

Indicator 6:

Did the city hall provide (Access to information) contracts for its current supplier of telecom and internet services on request?

How open is the city in providing full contract details on demand to a citizen?

Results:

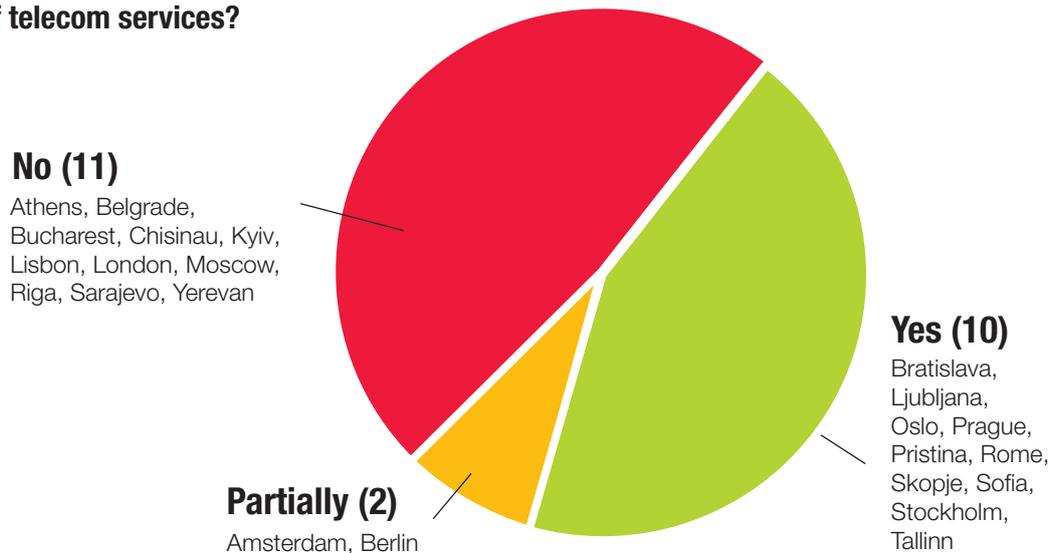


This indicator was evaluated using the so-called mystery shopping method. The information itself was secondary, most important was compliance with the right of access to information. We asked: “Based on the law of access to information, please send us a full copy of contract(s) with supplier(s) currently providing telecom and internet services to the city hall.”

The requests were sent using private emails in a local national language. In general, we demanded responses even when the information was available and searchable on the official municipal website of the respective cities. The goal was not solely to gain access to particular information, but rather explore whether respective city halls are responsive to regular demands from ordinary citizens.

Only more than a third of the approached city halls were capable and willing to provide the requested information within the demanded timeframe (30 days for the purposes of the project, even though the time frame varies per country) and scope and with the requested content:

Did the city hall provide on request contracts for its current supplier of telecom services?



Numerous cities sent the requested information in full scope without keeping the data anonymous or sanitising it in any way, as was the case with Ljubljana.

For some of the cities, providing answers to the requests posed a real challenge – especially in cases with multiple telecommunication and internet services providers. The concrete example of Estonia’s capital Tallinn demonstrates how a municipality can approach this matter. Regarding the first request for information, the manager of the IT department responded within 24 hours, refusing to provide information contained in some of the contracts on the basis of security and trade secrets. After specifying the details of the request, the municipality provided our colleagues with all requested contracts and underlying material within five days.

With regard to the cities which publicise contracts on their respective websites, it was sufficient to provide us with the particular link. This was the case of cities like Bratislava ([HERE](#) and [HERE](#)) or Sofia.

The city of Moscow had a very peculiar approach. The city authorities responded solely by copying a web link where by law, all contracts have to be archived and published. Neither the link nor the date of signing the contracts were specified. Even though the actual contract was accessible on the website, finding it online took our Russian colleagues considerable time. Russian laws stipulate that in cases where citizens request access to publicly available information, it is sufficient that the respective official provides a link to the concrete website where the contract is published. It is therefore logical that the officials are acting with such a glaring lack of interest.

The city of Lisbon had a similar approach. The applicant was navigated to an official website of the public procurement called AcinGov – however, without providing a concrete link or instructions on where to find the contracts. Our Portuguese colleagues could only locate calls for public procurements without any actual contracts.

Response time on an information request from the city halls (in days)

Question: *Based on the law of access to information, please send us a full copy of contract(s) with supplier(s) currently providing telecom and internet services to the City hall.*



Indicator 7:

Are the names and contact details (at least either phone or the email addresses) of the city council members published on the city hall's website?

How can citizens demand accountability without knowing who represents them?

Results:



Most of the evaluated cities provide basic information about the city council members on its web, such as a phone number, email address, party affiliation, and often a photo.

In regard to this indicator, the evaluated cities can be categorised into three groups – those that transparently publish contacts for all elected representatives, a smaller category that publishes contacts only for the political parties and factions (Yerevan, Ljubljana, Athens) without providing contact details for a particular councillor and in the third group are the cities where it is most difficult to reach its elected representative – they simply do not publish contacts at all. These include in particular some major Balkan capitals (Sofia, Bucharest, Skopje, Belgrade, Chisinau.)

Tallinn, Estonia belongs to the first group. It publishes the complete contacts creatively and links them with other information which could be useful for the citizens. Contacts are linked to the entries of a respective councillor from specific meetings and sessions – including the date and time of the post and a link to a specific agenda.

London has gone even further and has prepared an almost perfect way of how to present the councillor to the public. In a modern, well-arranged interface, you can learn about each member of the city council in addition to the contact information and their annual income. Transcripts of meeting papers are also available, as well as a list of donations received – e.g. a paid dinner, a bottle of wine or tennis tickets.

In addition to donations, each councillor is also shown with an overview of their spending, but also features that may represent a conflict of interest as well as with a list of taxable benefits – for example, that the person has obtained an annual public transport pass.

This format could serve as an example of good practice also for other municipalities – not just capital cities.

Gifts and hospitality of elected councillors in London:

2016		
Date Gifted	Details	Donor / Provider
12 November 2016	Two Tickets to the South Grandstand for the Lord Mayor's Show.	City of London Corporation
03 March 2016	bottles of wine	Mayor of London
03 March 2016	Case of wine (6 bottles)	Mayor Boris Johnson
12 February 2016	A six day visit to Hanoi, including Air Tickets, Accommodation, Hospitality and a number of commemorative gifts	British Ambassador to Vietnam
09 February 2016	Dinner at New Scotland Yard	Metropolitan Police
2015		
Date Gifted	Details	Donor / Provider
06 July 2015	Lunch and tickets to Centre Court at Wimbledon	President of the Lawn Tennis Association
23 June 2015	Royal College of Nursing Congress including train tickets, hotel room for two nights, congress pass, dinner and breakfast	Royal College of Nursing
13 January 2015	London Comms Dinner in the Shangri-La Hotel at The Shard, London & Gatwick Airport	Gatwick Airport

In the third group of cities are those that do not provide any contact information on their website on the councillors or, provided it only in limited form and/or in a non-transparent format.

Belgrade published contacts only in a very opaque booklet that is available in a zipped format.

On the website of the city of Sofia, you can find basic information about the city council members, but you are not be able to find any email or phone contacts. In the case of Chisinau, you need to download an external text document to find members of the city council, but you are not be able to find the contact information – it contains only a name list and the party affiliation.

In the case of Ljubljana, contacts to political parties or factions of individual elected representatives can be found, but the site does not publish direct email or telephone contacts next to their names (except one representative). They are listed within subpages for the political parties they represent

The Armenian capital Yerevan provides the possibility to contact an elected city representative in an old-fashioned online form, but you can only choose a political faction, party or specific commission, not a specific politician.

Madrid also offers the possibility to contact elected representatives of the city only via a contact form, but here the process is at least easier and the request would be sent directly to the councillor concerned.

Indicator 8:

Is the city mayor's working schedule (meetings calendar) published on the city hall's website?

Who is the mayor and councillors meeting and dealing with? (potential lobbying meetings)

In this indicator, we evaluated whether the mayor publishes at least 5 events per week.

Results:



There are some good practices among all of the assessed capital cities, however, it is obvious that publishing the working calendar is still not a common practice among the mayors of European capital cities. Up to two-thirds of the municipalities do not publish the mayor's working calendar at all. Some make public only the calendar of the councillors (Amsterdam) or publish the calendar in a form which more resembles a news feed (Yerevan).

An example of good practice is the city of Berlin which publishes all the working meetings and the mayor's working calendar for the entire working week in advance. Tallinn also has a nice calendar, although it is not always complete and mixes working schedules of the mayor and their deputies. Vilnius has a well-prepared calendar that is synchronised with Google Calendar, but is rather formal – it repeats generic types of activities such as meetings with advisors, discussions with advisors, strategic meetings and so on.

With transparency, one can also go against the official stream. Flavia Marzano – the city’s deputy (not the mayor) of the Italian capital Rome is one example. Unlike her colleagues who do not publish their work calendar at all, Marzano publishes her work calendar in full detail. So, you can get familiar with her professional daily routine and get to know what Marzano is doing almost hour after hour:

2016		
Date Gifted	Details	Donor / Provider
12 November 2016	Two Tickets to the South Grandstand for the Lord Mayor's Show.	City of London Corporation
03 March 2016	bottles of wine	Mayor of London
03 March 2016	Case of wine (6 bottles)	Mayor Boris Johnson
12 February 2016	A six day visit to Hanoi, including Air Tickets, Accommodation, Hospitality and a number of commemorative gifts	British Ambassador to Vietnam
09 February 2016	Dinner at New Scotland Yard	Metropolitan Police
2015		
Date Gifted	Details	Donor / Provider
06 July 2015	Lunch and tickets to Centre Court at Wimbledon	President of the Lawn Tennis Association
23 June 2015	Royal College of Nursing Congress including train tickets, hotel room for two nights, congress pass, dinner and breakfast	Royal College of Nursing
13 January 2015	London Comms Dinner in the Shangri-La Hotel at The Shard, London & Gatwick Airport	Gatwick Airport

Online calendar applications are a good way to publish the business calendar. This can be done literally with two clicks. However, only a few elected representatives are so transparent that they would make their “google calendar” public.

Indicator 9:

Are the current asset declarations of the mayor and the city council members published on the city hall’s website?

Does the public know how well-off their mayor and councillors are?

We have evaluated whether the public has sufficient quality data on the property of the mayor and the elected representatives of the city.

Results:



Only a small selection of the surveyed municipalities of the European capitals publish income and assets (declaration) of members of municipal councils and mayors. Also, only little of this data is easily accessible from the websites of the cities and is really complete.

In some countries the primary concern is about how politicians may abuse their power to take advantage of conflicts of interest they hold and it would seem unjustifiably intrusive to require disclosure of all their assets and their value. Whereas in other jurisdictions the concern may be more about the embezzlement of public funds. In our research we were looking at the declaration of assets of the elected mayors and city councillors.

The city of Madrid is a good example how the asset declarations could be published. Each member of the Madrid city council publishes not only his or her contact details but also their CV, achieved education, level of foreign language proficiency, an overview of their previous career, public office held (currently and in the past) and property declaration – including data from the tax report:

Declaration of patrimonial assets

Initial Annual 2016 Annual 2017 **Annual 2018**

Date of declaration: 09/11/2018

1) REAL ESTATE PATRIMONY

Class	Type of right	Acquisition title	Municipality	Part. (%)	Cadastral value (€)	Acquisition date	Observations
Urban	Full control	Trading	Madrid	50	170.504,90 €	2002	
Urban	Full control	Trading	Madrid	50	14.184,54 €	2002	
Urban	Full control	Trading	Madrid	50	12.010,73 €	2002	
Rustic	Full control	Donation	Real city	20	178.861,00 €	1987	

2) DEPOSITS IN CHECKING, SAVINGS AND OTHER TYPES OF ACCOUNT DEPOSITS

Class	Deposit entity	Average annual balance or value in euros
Current accounts	Bankia	25.978,32 €

3) OTHER FURNITURE HERITAGE

Class	Description	Number, amount or value in euros	Acquisition date
Shares and participations of all kinds in collective investment companies and institutions	Agricultural Mechanical SAT (85,588 Titles)	88.990,00 €	09/09/1995
Shares and participations of all kinds in collective investment companies and institutions	Agropecuaria El Rosario SAT (10 Titles - 20%)	6.010,12 €	22/04/1997
Shares and participations of all kinds in collective investment companies and institutions	Advice and Services Agronomos, SC (30%)	801,52 €	01/01/1995

4) VEHICLES (CARS, MOTORCYCLES, BOATS, AIRCRAFT ...)

Class	Brand and model	Acquisition date
Motorcycles	Yamaha X-Max 250 cc	2013

Madrid: City councillors' asset declaration

Members of the city council from Moscow must have – according to the legislature – property returns available on the municipality's website. In fact, they are (according to Transparency International Russia) “well hidden” and you will probably find them only through an internet search engine. But in fact, they contain quite detailed information – also about the official property of the family members of the municipalities. You can, for example, find out, what cars the city councillors own.

You will not find asset declarations of the mayor and the city councillors on the Vilnius city website, even though Lithuanian law imposes this obligation on the municipalities. Similarly, for mayors (but not councillors), Slovenian legislation has imposed the obligation to declare their assets and these declarations should be available to the public for 24 months after leaving the office in the section that refers to asset increases or decreases during the time in the office and one year after leaving it. However, no such asset declarations have been published on Ljubljana's website or the website of the Slovenian Commission for the Prevention of Corruption either. The latter institution argues that it is impossible to edit approximately 15,000 documents by different subjects in a way that would meet the requirements of personal data protection.

Several members of the municipalities publish their asset declarations – but only on external web pages (Tallinn, Prague, Belgrade, Chisinau, Riga, Skopje), not on the relevant city's official websites.

In the case of Athens, only some (5 out of 33 in 2017, but none in 2018) municipal deputies made the asset declarations available and public.

Several municipalities do not publish asset declarations of the mayor and the councillors at all – Stockholm, Yerevan, Berlin, Bern, Lisbon or Bratislava.

Indicator 10:

Are the minutes from the city council sessions published on the city hall website?

The public should know what was discussed in the council and how councillors decided.

We have evaluated whether the records of city council meetings exist and, at the same time, how detailed these records are. Whether it is clear to the citizens what the content and outputs of the meeting was and what was actually voted on.

Results:



22 out of 26 capital cities have minutes from the city council sessions published. Few cities publish some minutes but they are not complete (Bucharest, Prague). Several cities do not publish the city council sessions at all or inadequately. Such cities include Bratislava, Belgrade, Riga and Skopje.

Berlin has transcripts published in a very clear system. The content of the texts is not completely formal – they also contain complete and nicely processed transcripts, where there are even notes on who (which political faction) laughed at the debate. This gives the reader a good idea of the content, form and even the atmosphere.

The process and the results of the meetings are handled quite well by the Moscow City Council. It is possible to choose the agenda, protocol, transcript, voting results (including by the members of the council) as well as a video of the meeting.

Several municipalities do not publish written minutes but only a video of the sessions. On the top of the list is Amsterdam with a clear and user-friendly archive system. You can see the video of the session as a whole, but it is also possible to easily search for the part that interests you. Names and political affiliation are assigned to the speakers. Each part has a complete transcript and, where relevant, an accompanying document or protocol is assigned. Videos can be exported. The interface is highly professional as if it was made for a television channel:

You are at: Calendar > Meeting COUNCIL 07-11-2018

13.00 hrs and 19.30 hrs and Thursday 8 November 2018 at 13.00 hrs and if necessary 19.30 hrs 07-11-2018

Date: Wednesday, November 7, 2018
Start time: 1:00 pm
Location: Council room

Calendar documents

GENERAL	00:00:00
0. Opening	00:00:02
1 Communications.	00:02:16
2 Adopt the minutes of the council meeting on 10 and 11 October 2018.	00:00:13

Agenda Items

- General
- 0. Opening
- 1 Communications.
- 2 Adopt the minutes of the council meeting on 10 and 11 October 2018.
- 3 Setting the agenda (1)
- 4 Communication of the incoming agenda.
- 5 Oral Question Time.

Now talking

Schijndel, AHJW van (Forum for Democracy)

Filter

Select speaker (s):
When you select speakers, the agenda item list is refreshed automatically.
Selecteer spreker(s)

Select agenda item (s):
When you select agenda items, the speaker list is refreshed automatically.
Selecteer agendapunt(en)

Other examples include the cities of Sofia, Ljubljana, Chisinau, Riga or Vilnius. However, the quality of processing varies. For example, Pristina publishes only uncut video captured by a static camera, somewhat better outputs are published by Athens, while a video from Vilnius is cut in the post-production process, footage taken by more cameras and a name of the speakers added to the posts.

Also, in this case, we can say that if two do the same thing, it's not always the same. One thing is to achieve formal fulfilment of transparency (city of Sofia), the second is to create an intuitive web interface, with high user quality and usability and a functional archiving and retrieval system (Amsterdam case).

Bucharest only publishes scans of decisions in a very opaque system. It looks as though someone wanted to fulfil a formal obligation. One cannot see an effort to honestly inform the public about the decision-making process.

The executive of the Swiss political system is defined by a collegial system. Decisions of the executive (City Council) are issued as decision of the group ("Kollegium"). The council decides as unity and its members have to hold on to this decision. Therefore the minutes of the sessions of the Council of the city of Berne are not open to the public.

Prague has nicely prepared schedules and minutes of the municipality meetings. It is easy to filter the data in the online interface – by name, date, program or listings. However, the content of the discussions is missing in the minutes. Thus, the reader learns only the dry facts, not the content of the discussions that preceded the vote.

Similarly, Kyiv has formally fulfilled its commitment by publishing the city's decision-making process. However, entries are only available in a form of zipped scans.

Indicator 11:

Are the individual voting records from the city council sessions published on the city hall's website?

The public should know who voted for what policies.

Results:



Within this indicator, the cities are divided into approximately two equally sized groups – those that publish voting records (to some extent) and those that do not.

Simply put, a phenomenon of complete records of individual voting within municipal councils is prevalent in countries outside western Europe, such as (Bratislava, Prague, Kyiv, Tallinn, Vilnius, Moscow, Athens, Ljubljana).

Vilnius, an example of voting result records on the city website:

Voting results		Abstentions: 19	For: 23
Participated in voting -			
What	Fraction	How did you vote?	
Kasparas Adomaitis	Group of Liberals for Vilnius We are proud of!	For	
Rita Balčiūnienė	Group of Liberals for Vilnius We are proud of!	For	
Bronius Cicenās	Order and Justice Group	For	
Renata Cytacka	Group of LLRA-CSS and Russian Alliance Coalition "Valdemar Tomashevsky Block"	For	
Aleksandr Fiodorov	Group of LLRA-CSS and Russian Alliance Coalition	For	

Several cities emerged from a political culture where the decision-making is vested with political parties, clubs or factions within the municipal council and the voting is done unanimously (the discussions are initially held internally). Such political culture is evident usually in the western European countries, as for example in Germany ([Berlin](#)). A different approach was opted for in Lisbon where official voting by each individual party, club or factions are published, without identifying the voting by individual party members. (e.g. 6 votes from the PS party, 4 votes from CDS). Similar to the system adopted by western European countries, political parties vote unanimously.

In the case of Chisinau, Amsterdam, or Sofia, records of voting are only available in video archives, not from official written records. In Riga it is possible to request the record of voting, otherwise, a video archive will have to suffice.

Indicator 12:

Is the current lobbying register of the mayor and the city council members available to the public?

Which lobbyists are those who the elected representatives meet?

We evaluated whether there exists a national registry of lobbyists and searched for it online, on the official municipal website.

Results:



Apart of Madrid, none of the assessed cities publish a registry of lobbyists or lobbying contacts. Most countries do not have a clear definition of lobbying in their legislation.

Madrid has a register of lobbies published online and it is possible to check every lobbyist registered and the meetings held with the City Hall. This shows the name of the representative or the staff from the City Hall who attended the meeting. Most countries do not have a clear definition of lobbying in their legislation.

France took up applying the national lobbying registry – including at communal level – as of 2021. Belgrade, Serbia is awaiting the application of a pending legislative amendment of November 2018, which would regulate lobbying as of April 2019.

According to Transparency International Estonia, citizens can partially find information on the agenda of interest groups in the official calendar of the city council. However, providing information in the form of a calendar of appointments of the mayor or the councillors is insufficient. It shows only a small number of official meetings with representatives so it is reasonable to assume that meetings with interest groups take place outside the published agenda of local political representatives.

Indicator 13:

Is the Code of Conduct of the elected city representatives on the website?

What are the ethics rules for the elected representatives of the city?

Results:



The majority of the assessed capitals has adopted and published a code of ethical conduct on their official websites. The form of publishing varies among the cities. Several cities publish their respective Codes of Conduct directly on their websites, in a readable, clear, concise and an easy-to-find way.

London has multiple Codes of Conduct, protocols, norms, and procedures published in a clear way on of the official websites. The entire structure of the website, including the Code Of Conduct, could serve as a leading example of good practices to other capitals. The clarity of the document is enforced by the clear contents in the introductory part of the document. The Code covers a wide spectrum of areas, it maintains its readability and offers unambiguous enforcement in cases of it being breached.

Contents	Page
Section 1 – Introduction	1
Section 2 - Conduct of the Authority's Business	1
2.2. Standards and responsibilities	1
2.3. Proper advice and support	1
2.4. Confidence and trust	2
2.5. Declaration of interests	2
2.6. Activities in professional or other organisations	3
2.7. Standards in the workplace	3
2.8. Working relationships between managers and employees	4
2.9. Working relationships with the Mayor and Assembly Members	4
2.10. Attendance	4
2.11. Alcohol, drugs and smoking	5
2.12. Behaviour outside the workplace	5
2.13. Gifts and Hospitality	5
2.14. Contact with Press and Media	6
2.15. Use of the Authority's internet and Email	6
2.16. Whistleblowing – standards	6
Section 3 - Equal opportunities standard	
3.1. Introduction	7
3.2. Definition of discrimination	7

The Code of Conduct of Pristina is published in a more concise way in three languages (Albanian, Serbian and English). Madrid has a document which is easy to locate and is published in pdf format.

Some capitals, like Berlin, have a document in place which on the face of it bears elements of a code of conduct but in reality only constitute a summary of legislation for representatives.

The Code of Conduct of the Bulgarian capital Sofia is difficult to locate, it is only searchable via specific search engines – which is time-consuming for ordinary citizens – for example, our Bulgarian colleague took 10 minutes to locate it, even though she knew the precise keywords under which the Code of Conduct could be found. Similarly, in the case of Moscow, it was difficult to find the Code of Conduct on the Moscow City website. It took more than 5 minutes and was not possible to find by intuition.

Bucharest or Skopje published only a scanned document without optical character recognition, which prevents the user from querying and handling the document.

Indicator 14:

Did the city provide information on mayor's and individual councillors' total pay for 2017? (see the wording below – GI7)

How much does the mayor's and councillors' work cost?

Results:



Each of us contributes with our taxes to the salaries of the employees of the state, cities, and municipalities. It should be taken for granted that the salaries of the elected representatives from the municipalities should be made public. Public interest should prevail over privacy. Today, even private football clubs disclose their players' salaries and bonuses.

The same as indicator number 6, this indicator was also evaluated using a mystery shopping method. More than the information itself (which in several cases is available on the website of the city) we were interested whether the city is willing to answer a simple right of access to information request from "an ordinary citizen". The asked question was: "Based on the law of access to information, please send us the information on the total salary of the mayor for 2017 and also the total individual salary of every councillor from their public functions."

The response time of the municipalities to the request has varied – also on the basis of the deadline set by national legislation. Some sent a reply within a single day (Tallinn, Stockholm), the next day (Oslo), after 4 days – Berlin. Others have been waiting to send the answer for months.

Did the city provide information on Mayor's and individual councillor's total pay?

Yes (12)

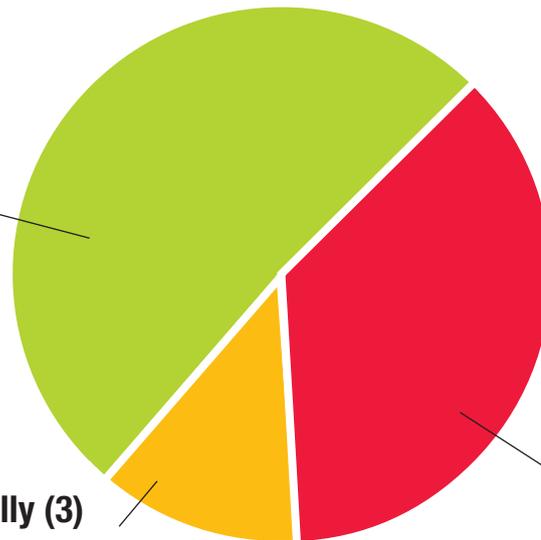
Bratislava, Berlin, Bern, Ljubljana, Madrid, Oslo, Prague, Pristina, Riga, Skopje, Stockholm, Tallinn

Partially (3)

Amsterdam, London, Sofia

No (9)

Athens, Belgrade, Bucharest, Chisinau, Kiyv, Lisbon, Moscow, Sarajevo, Yerevan



Several cities have responded completely and within the deadline (Berlin, Bratislava, Ljubljana, Oslo, Prague, Pristina, Skopje, Stockholm and Riga).

Annual salaries of the elected councillors in Bratislava:

Meno, priezvisko, titul	Vyplatená odmena v roku 2017
Ing. Milan Černý - 1. námestník primátora	39 785,65
PhDr. Ľudmila Farkašovská - námestníčka primátora	39 794,33
MUDr. Iveta Plšeková - námestníčka primátora	39 912,35
Ing. Katarína Augustinič	11 731,30
Ing. Vladimír Bajan	4 978,11
Ing. Martin Borguľa	8 925,05
Ján Budaj	12 756,64
Ing. Pavol Bulla	10 507,30
Mgr. Ján Buocik	10 320,93
Dana Čahojová	9 542,00
RNDr. Marta Černá	6 415,00
Mgr. Ondrej Dostál	8 899,85
Ing. Slavomír Drozd	11 506,03
Gabriela Ferenčáková	5 244,58
Marian Greksa	10 781,14
Mgr. Gábor Grendel	10 755,90
Ing. Peter Hanulík	9 023,76
Ing. Iveta Hanulíková	9 209,07
Peter Hochschorner	4 887,36

Amsterdam sent the reply, but only after the statutory deadline (this took 6 weeks – the deadline is 4 weeks). The city of Amsterdam also decided not to publish copies of the mayor and deputies' pay slips because of "the importance of privacy protection that outweighs the importance of disclosing governmental information". However, they have published an internet link to a website where salary classes for elected representatives of local governments are defined.

The city of Riga has an interesting approach. According to the law, every public institution in Latvia is obliged to publish the monthly salaries and bonuses paid to each employee. Most state institutions and municipalities (including the city of Riga) are erasing the information about the salaries paid out in the previous month from their websites because the law explicitly requires only up-to-date information for the respective month. Older data is therefore only available upon request.

The city of Moscow responded to the request by referring to the city’s website – to a section that defines property and income statements. The website does not however contain the required information – about the income from their public functions.

The response time on the access to information request varied considerably. From 0–7 days in Berlin, Bratislava, Oslo, Pristina, Riga, Skopje, Stockholm and Tallinn, 44 days (Amsterdam) and 51 days (London). Several municipalities did not send the answer at all.

Response time on an information request from the city halls (in days)

Question: *Based on the law of access to information, please send us the information on a total pay of the Mayor for 2017 and also the total individual pay of every one of councilors from their public functions.*



RESEARCH METHODOLOGY

Units of analysis – list of cities, involved partners, scope and calendar of actions.

The ambition of this pilot study was to test the access to information in the capital cities of every European country. Eventually, based on our ability to contract partners to carry out local research, we settled on 26 countries (see the list of partners below).

Data collection and evaluation

In both personal and online discussions, we selected 14 main indicators (see their full wording, justification and grading below). Twelve of them were based on data found on capital cities' websites and two of them based on right of access to information requests. Finding information online is currently the standard and most accessible way for most citizens. However, when a citizen cannot find information online, he or she should be able to get an answer from the officials directly within a reasonable time. The requests were sent from a personal address of our collaborator, not an institutional address such as Transparency International, so as not to compromise the mystery shopping nature of the inquiry.

Most of the data were collected during November 2018.

After the results and evaluations were collected, TI Slovakia double-checked each indicator with all the chapters. It compared the evaluations according to the findings and comments, compared benchmark criteria and in about 10% of cases has proposed a change of the evaluation result. Most of these proposals have been accepted.

Challenges and obstacles

In the course of the research several challenges arose. Cities do not have identical competences, not least due to the form of administrative division. Several have multiple local authorities. Berlin is one of such cases where the city has the status of both – a city and a state (Bundesland). As such, the Berlin City Hall is tied to the Berlin House of Representatives. And Berlin is not special – there is London and several other cities with similar status as well.

Brussels has an even more complicated status when it consists of 19 independent municipalities. For this reason, we have excluded Brussels from the pilot research.

Having external national data portals for some kinds of information (such as tender calls, asset or lobby declarations) also added to the difficulty of cross-European comparison. We awarded full marks to cities which directed their citizens to those external websites on their city platforms and half marks for those who did not, even though the required information was actually published somewhere on the internet.

Scoring system and the indicators

As the project is only working with a limited number of indicators, we decided to create a three tier result system: the Red category meaning low level of accomplishment equals 50% or fewer possible points, orange – medium level – more than 50% and less than 75% of points have been received and finally the green category – high level – 75% and more of points.

Generally speaking, this shows how the city halls provide access to information to their citizens in the main categories we selected. If it is transparent in how decisions are made, how money is being spent, how the elected representatives vote and this information is easily accessible either on the website or upon request.

The warning is due! The access to information scoring does not show how corrupt the cities are. That is also one of the reasons why some cities from countries which perform well in the CPI (Corruption Perception Index) did not perform so well in our research and on the contrary, some cities (Pristina, Kyiv) from more corrupt countries performed quite well in our research. Many countries with a long history of corruption have in the past decades undertaken large legislative changes towards openness, often "jumping over" established democracies.

List of chapters and other organisations which took part in the research – with the list of evaluated cities:

TI Armenia – Yerevan
TI Bosnia and Herzegovina – Sarajevo
TI Bulgaria – Sofia
TI Czech Republic – Prague
TI Estonia – Tallinn
TI Germany – Berlin
TI Greece – Athens
TI Italy – Rome
Kosova Democratic Institute / Transparency International Kosovo – Pristina
TI Lithuania – Vilnius
TI Latvia – Riga
TI Moldova – Chisinau
TI Netherlands – Amsterdam
TI Northern Macedonia – Skopje
TI Norway – Oslo
TI Portugal – Lisbon
TI Romania – Bucharest
TI Russia – Moscow
TI Serbia – Belgrade
TI Slovakia – Bratislava, London, Madrid
TI Slovenia – Ljubljana
TI Sweden – Stockholm
TI Switzerland – Bern
TI Ukraine – Kyiv

The list of the indicators, reasons for asking and explanation (reference) to the evaluators:

Question	Reason for asking	Explanation	Other things to note (not graded)	Answer 1 (100% of points)	Answer 2 (50% of points)	Answer 3 (0% of points)	Answer 4 (N/A)
Are the notices of public procurement calls available on the city hall's website? (the item procured, deadline, bidding conditions)	Can the public check who is competing for the city funds and how?	Whole text or hyperlink to a central procurement registry with the whole text	Is the information (all of it) available to everyone?	Yes	Partially (incomplete information)	No	N/A
Are the results of the city hall's public procurements in 2018 available to the public? (the name of winner, price, date, the item procured)	Can the public check who won the tenders and where how much money is going?	Whole text or hyperlink to a central procurement registry with the whole text	Is the information (all of it) available to everyone?	Yes (available on the website, or links to national procurement portal)	Partially (available after the request)	No (unavailable)	N/A
Is the 2018 budget available on the city Hall's website?*	Where is city getting money from and how is it spending?	Spending in total and by sectors, departments, sub departments	Is the budget published as open data? Any budget app for easy viewing? Friendly-to-understand or rather technical?	Yes	Partially (only very simple document or table)	No	N/A
Is the final budget report (budget execution) for 2017 available on the city hall's website?	How does the plan of the budget compare with reality for 2017?	Spending in total and by sectors, departments, sub departments	Is the budget report complete and readable?	Yes	Partially (only very simple document or table)	No	N/A
Does the city hall publish its contracts on its website?	Contracting on a transaction level, including full contract text (not only procurement, but sales, grants, etc., too)	Whole text or hyperlink to a central contract registry with the whole text	If only some (like more expensive) contracts are published, the answer if only partially given.	Yes	Partially (clearly not all contracts are included, such as only procurement contracts of certain value)	No	N/A
Did the city hall provide on request (right of access to information) contracts for its current supplier of telecom and internet services?	How open is the city in providing a full contract to a citizen on demand?	We expect a copy of the contract or contracts to be received. Measure the speed of response, also, in days.	Are full texts of contracts disclosed? Anything missing? Please record how many days it took the city to respond.	Yes	Partially (incomplete data)	No	N/A
Are the names and contact details (at least either phone or the email addresses) of the city council members published on the city hall's website?	How can a citizen demand accountability without knowing who represents them?	For full points, each should have at least phone or email address	Are their party identifications published, too? The district they represent?	Yes	Partially (incomplete data)	No	N/A
Is the city mayor's working schedule (meetings calendar) published on the city hall's website?	Who is the mayor and councillors meeting and dealing with? (potential lobbying meetings)	They should have at least 5 meeting per week noted, otherwise it is clearly far from complete	This should not have a form of media outputs but rather include who the mayor met, when and for what purpose.	Yes	Partially (older than 2017, but not older than start of the current mandate)	No	N/A
Are the current asset declarations of the mayor and the city council members published on the city hall's website?	Does the public know how well-off the mayor and councillors are?	They should ideally be current, that is from 2017 or 2018.	Is this information available on the city website? Is it easy to find?	Yes	Partially (only mayor, or only councillors)	No	N/A
Are the minutes from the city council sessions published on the city hall website?	The public should know what was discussed in the council and how councillors decided.	All decisions taken and issues discussed must be recorded.	How detailed are the minutes? Can citizens understand what was really voted on?	Yes	Partially (if only name of items discussed or voted on, without the summary of discussions)	No	N/A
Are the individual voting records from the city council sessions published on the City hall's website?	The public should know who voted for what policies.		They might be published with minutes in one document.	Yes	Partially (incomplete data)	No	N/A
Is the current lobbying register of the mayor and the city council members available to the public?	Which lobbyists do elected representatives meet?	If there is a national register, we are seeking a link to it on the city hall website	Is the register available on the website? If not, is the link on the external website available at least?	Yes (available on the website)	Partially (either incomplete and not linked to the city hall website)	No (unavailable)	N/A
Is the Code of Conduct of the elected city representatives on the website?	What are the ethics rules for the elected representatives?	Code of Conduct is available on the website or direct link on the document is available on the website.	Is it available on the website? Is it easy to find?	Yes (available on the website)	Partially (only very simple document)	No (unavailable)	N/A
Did the city provide information on the mayor's and individual councillor's total salary for 2017?	How much does the mayor's and councillors' work cost?	Total pay means regular remuneration and any extra bonuses for every single individual (not total)	Please record how many days it took the city to respond.	Yes	Partially (only for some, only in total, etc.)	No	N/A

* Is the 2018 budget available on the city Hall's website? We have imitated a citizen search for information. If the budget was on the website, but a lay person was unable to find it in a 5 minutes, it was evaluated with 0 points.

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