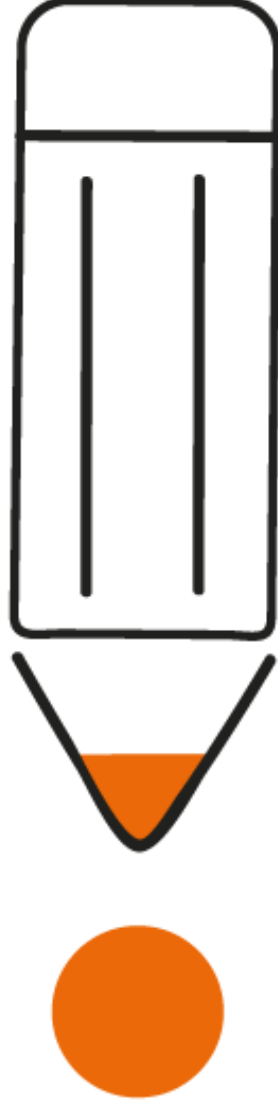


CRTA:



PARLIAMENTARY ELECTIONS 2020

Final report with recommendations

Summary

WE THANK ALL OBSERVERS, PARTNERS, AND DONORS,
WITHOUT WHOSE SUPPORT THE CRTA ELECTION
OBSERVATION MISSION WOULD NOT BE POSSIBLE

This is the English Summary of the Final Report, which includes only the Executive Summary and CRTA Election Recommendations. The full version of the Final Report in Serbian can be found on CRTA website: crtars.rs/parlamentarni-izbori-2020-zavrsni-izvestaj-sa-preporukama

SUMMARY

Elections for MPs of the 12th convocation of the National Assembly of the Republic of Serbia were held on June 21st, 2020. In addition to the regular parliamentary elections, regular provincial elections were held on the same day, as well as elections for local assemblies in 154 cities and municipalities in Serbia. The CRTA observation mission, as a non-partisan and independent national observer, monitored the entire course of the parliamentary elections, pre-election period, the Election Day and post-election period, until the announcement of the final election results, while local and provincial elections were not observed.

Taking into account the entire election process, from the moment of calling the elections, to the Election Day and the post-election period until the announcement of the final election results, the CRTA observation mission estimates that this has been the worst of all election processes observed so far, and although the elections as a whole met the minimum democratic standards, they will have a negative impact on democracy quality in Serbia. Despite the fact that the elections were conducted in accordance with the law and that there were no legal restrictions for political actors to present themselves and communicate with the public, voters were deprived of equal and objective information about the election offer. Instead of ensuring broad participation through dialogue, simulated pluralism was created, while clientelistic strategies, pressures and intimidations which commenced in previous election cycles continued and additionally diminished freedom of choice.

These elections were held in an atmosphere of boycott by a significant number of opposition parties, as well as in the shadow of the coronavirus epidemic, due to which a state of emergency was declared in the country, and the election campaign was suspended for more than 50 days. These elections will be remembered because, for the first time since 2000, the rules of the electoral system changed right before the elections were called, and also during the election process, without a public debate, contrary to international democratic principles. Although legal changes (lowering the electoral threshold from five to three percent, increasing the gender quota and weighting the quotients for national minorities) would not necessarily have negative effects on the electoral process, the manner of their adoption, without public debate and impact assessment and their timing reduced the predictability of the process and favoured the ruling parties. There was a two-percent decrease in the number of voters in the Unified Voters' List in relation to the previous elections, which has not been recorded in the last few decades, while the manner in which this decrease occurred was insufficiently transparent.

Attempts to improve the quality of electoral conditions as a result of talks between the government and the opposition during 2019 have been reduced to limited progress in legal changes and changes in practice. Most progress has been made in the areas of better regulation of the Unified Voters' List, process transparency and data availability, which should have aimed at increasing voter confidence in the electoral process, while there has been no substantial progress in areas that should lead to equal participation in the electoral process.

Although during the election campaign there was an equal representation in the television programme provided for the presentation of electoral lists, which was a legal obligation of the media, in the rest of the programme there was an uneven representation of political actors, and representatives of the ruling parties dominated. In the long period before the election campaign, as well as immediately after the Election Day, the representation of the ruling parties in the programme was so pronounced that there was almost no pluralism.

As in the previous election cycles, numerous abuses of public resources and an intensive public officials' campaign were noted. This is particularly significant in the context of state measures aiming to combat the COVID-19 epidemic, which have often been used for promotional purposes by the ruling parties. Electoral clientelism, the practice of promising resources and services in exchange for political support, was noted throughout Serbia and makes a well-established way in which political actors approach voters.

Institutions that protect the integrity of the electoral process have had different effects. Passivity, non-transparency and bias in decision-making were noticed in the actions of some institutions, while intensive educational and informative activity was also recorded, as well as several important reactions to violations of the law and negative occurrences in the elections, which can be considered to be an indicator of positive changes in the election administration and controlling institutions.

A total of 21 electoral lists ran in the parliamentary elections, which has been the largest number of electoral lists since the 2008 parliamentary elections. The ballot included four lists that made up the ruling majority in the previous convocation and 17 opposition lists. Among these lists, five belonged to national minority parties. In spite of the large number of candidates, the turnout of 49% has been the lowest since the 2000 parliamentary elections. The low turnout must be interpreted not only as a result of the boycott, but also as the fear of the spread of the coronavirus, and the dissatisfaction of voters with the political offer in the elections. The Election Day was on the verge of regularity, given the number, seriousness and territorial distribution of irregularities that may have an impact on the election results, which were recorded in eight to 10 percent of polling stations. Only three non-minority parties have crossed the previously reduced threshold, along with four national minority parties for which the electoral threshold does not apply. The election result is a parliament with the least pluralism in the last 20 years.

The parliamentary elections were marked by a repeat vote at 234 polling stations on July 1st, 2020, which is a lot in comparison to the previous election cycles. This largest repetition of elections in the past 20 years is primarily a consequence of the observed shortcomings in the minutes of the work of polling boards, which were established by the Republic Electoral Commission, and not of recorded violations of voting secrecy, keeping parallel voters' lists, pressure on voters, vote buying, voting without IDs and other reasons for which objections were lodged with the Commission. The CRTA did not observe the repeated voting on July 1st, due to the worsened epidemiological situation, as the number of infected with the coronavirus after the Election Day, June 21st increased, as well as the because the competent institutions did not timely declare whether the safety conditions for the repeat vote had been met.

For the purposes of observing the parliamentary elections in 2020, the CRTA observation mission created teams of long-term observers who were deployed to monitor the election campaign in all towns in Serbia with over 1000 inhabitants, all televisions with national frequencies in the extended prime time, over 300 official political accounts of parties and their representatives on social networks, as well as the work of the Republic Electoral Commission. More than 1,700 short-term observers were trained to monitor the Election Day. On the Election Day, June 21st, they were deployed in a random and representative sample of 500 polling stations to observe the quality of the election process inside polling stations, in front of polling stations, and for the first time, voting outside polling stations (*from home*) with the help of specially trained teams.

Following a call from the authorities and based on the findings of the assessment mission in December 2019, OEBS/ODIHR initially proposed, for the first time after 2007, that the entire Election Observation Mission (EOM) observe the elections scheduled for 2020. However, due to the coronavirus situation ODIHR monitored the elections in extremely reduced capacities, only in the last weeks of the election campaign. The Election Day was also observed by five other accredited national organisations, two international ones in addition to the OSCE/ODIHR, as well as by representatives of various embassies and international institutions.

Bearing in mind that the long-standing inequalities between campaign participants, including their resources and media representation, had not been resolved, the lack of progress in ensuring the regularity of the Election Day, the circumstances in which these elections took place, especially changes in the electoral system just before calling of the elections and amendments to laws during the campaign, low turnout and inexistence of genuine pluralism in such a Parliament the CRTA has concluded that these elections met the minimal democratic standards, but that after their holding, democracy in Serbia has become even more endangered.

Pre-election period

After the dialogue between the opposition and the government held in 2019, legal changes occurred aiming to improve the election conditions and to design more precisely the existing regulations, but did not extend into the fundamental election rules. Nonetheless, the election process was marked by changes in the key rules of the game just before the start, and even during the election campaign, which was not the subject of public debate and is contrary to democratic standards. The February amendments to the Law on the Election of Members of Parliament and the Law on Local Elections first reduced the electoral threshold from five to three percent, increased quotas for women on electoral lists to 40 percent, and introduced weighting of quotients for national minority parties. After the state of emergency and on the eve of the continuation of the election campaign,

there was another round of amendments to these laws, which gave local governments the authority to certify supporting signatures for submitting electoral lists, which had exclusively pertained to the competence of notaries since 2017.

From the moment of announcing the elections on March 4th until the interruption of the election process on March 16th due to the declaration of the state of emergency, as well as from the announcement of the continuation of elections on May 11th until June 29th, when the 163rd session of the Republic Electoral Commission was held, our observation mission closely monitored the work of this election administration body. The work of the Republic Electoral Commission during the election campaign was mainly conducted in accordance with its competencies and the existing legal framework, with a more pronounced educational and informational activity in relation to previous years. However, the electoral list nomination process was marked by doubts among election participants about the legality of the supporting signatures collection process.

The number of voters in the Unified Voters' List has long been considered in public as exaggerated, as it did not reflect the actual number of voters present in the country. The number of voters was reduced by two per cents, which is the highest percentage in the last decades. If it had been done in accordance with the law, it might be a step in the right direction. However, the lack of transparency in this process only further nourishes already deep-rooted suspicions of one part of voters about manipulations in the Voters' List.

The findings of long-term observation of the election campaign throughout Serbia, in all towns with over 1,000 inhabitants, show that the campaign passed without clear public policy programmes, as well as with a reduced scope of activities involving direct contact with voters due to the coronavirus situation. The contents of the election campaign, primarily of the list "Aleksandar Vučić - For our children", gave the impression that it was a campaign for the presidential, not the parliamentary elections. Infrastructure projects and investments stand out as the most frequently mentioned topics by the ruling electoral lists, the promotional activities of which were twice as common in relation to the opposition, while the opposition lists dealt with social and communal topics, as well as infrastructure. The opposition in the boycott almost exclusively called for a boycott and addressed the issue of election conditions, although a strong campaign to boycott the elections was lacking on the ground.

Measures caused by the coronavirus epidemic reduced physical contacts during the election campaign, so that, for example, the list "Aleksandar Vučić - For our children" organised online rallies. On the other hand, COVID-19 received its share of space as a topic in the promotion of the ruling majority, in a positive light of the state's victory over this virus. The CRTA observers found out that this topic of the state's success in the fight against the coronavirus was also present in the new models of influencing voters. Phone calls to citizens were made appearing to be a survey, but were actually techniques abused for propaganda purposes (push poll). Mail was also used, as letters were sent to pension recipients, which caused suspicion that there was a potential misuse of public resources, as well as of citizens' personal data. Nevertheless, as the Election Day approached, the campaign in the field became more intense, while the public officials' campaign, various forms of misuse of public resources and clientelistic practices in bribing voters became more pronounced.

The CRTA observers noted more than 2000 appearances of republic, provincial and local public officials, the Prime Minister and all 18 ministers, as well as the President of the Republic, in towns across Serbia. In two thirds of the cases, they linked their appearances to the public function they performed, and the most common reason for their appearances were tours, commencements or completions of public infrastructure works. Thus, public officials as a part of regime used the opportunity to gain more media attention during the elections or to openly abuse their public office to promote a political party, which the CRTA reported to the Anti-Corruption Agency.

During the election campaign, the CRTA mission recorded almost 450 situations throughout Serbia in which parties and their activists were engaged in conducting various humanitarian activities and performing public works of various scales. Such activities do not represent the purpose of founding and operating a political party, they are treated as clientelistic and contribute to blurring the line between a political party and the state. More than 50% of the recorded situations refer to various public works: arranging green areas and playgrounds, arranging the space of local communities, houses of culture, painting bridges, embanking roads... In addition, during the campaign, local branches of the ruling parties published on social networks and websites integral

municipal documents about the planned and implemented activities, which led to the merging of public functions and political parties' engagements in the eyes of voters.

The CRTA observation mission filed one criminal complaint for vote buying and recorded several allegations of bribery and corruption in the election process, i.e. situations in which political actors, superiors in the workplace or unknown persons offered money or other benefits, such as employment or employment contract extension, in exchange for a vote. In addition to offering benefits, our observers noted in the whole country cases of voters being forced to vote or not to vote for a particular actor in elections by threats or intimidation.

The monitoring of the extended prime-time programme on all televisions with national frequencies from October 2019 until the announcement of the election campaign showed a pronounced dominance of the representatives of the ruling coalition, who occupied almost three quarters of the total time. Monitoring showed that by the end of the election campaign, the representation of the ruling and opposition lists that participated in the elections had been balanced, and that political actors who advocated a boycott of the elections were marginalised and represented in a mostly negative tone. Although in the later phase of the campaign there was a decrease in the share of representatives of the ruling parties in the overall media coverage. Unlike opposition actors, they were predominantly represented as public officials, in programmes outside the formal election segment. Also, immediately after the elections held on June 21st the trend of representation of political actors soon returned to the state from the period before the election campaign. After the Election Day, representatives of the ruling parties occupied 75 percent of the total space reserved for all political actors, representatives of the opposition that participated in the elections about five percent, and representatives of the opposition in the boycott about 20 percent.

Monitoring of more than 300 accounts of political parties and their leaders on social networks, showed a more pronounced activity of opposition actors on social networks, primarily on Facebook. The profiles of the ruling parties on Twitter recorded a greater engagement of their followers, who shared their content five times more often than the followers of the opposition accounts on this network.

For the first time since the 2014 parliamentary elections, the Regulatory Authority of Electronic Media (REM) has systematically monitored media coverage, with weekly reports reporting on key findings on candidates' representation in the election programme. However, the REM conducted the monitoring in a non-transparent manner, denying the public insight into the methodology, while the way the data was presented gave the impression of a biased and selective approach, and the results themselves distorted the image of political actors in the media. As a positive development in the work of this independent body, the rapid action of the REM Council regarding the requests for opinions sent by the CRTA observation mission to the REM can be singled out, but the lack of prompt handling of reports and lack of initiative to initiate proceedings ex officio still raise worries. Nevertheless, the most significant problem in the work of this institution in relation to the election process is the fact that by adopting inadequate bylaws, the REM failed to contribute to equalising the chances of all election participants, primarily by not regulating reporting on the activities of officials who were candidates or prominent representatives of electoral list submitters in shows that did not belong to the election programmes.

In comparison to the previous election processes, there have been noticeable improvements in the field of transparency of the work of the Anti-Corruption Agency (the Agency). Greater transparency was ensured by improving the legal norms that the Agency applies in its work during the election campaign, as well as by publishing decisions on the Agency's website within the short deadlines provided by law. It can also be stated that the Agency acted proactively, which was reflected in the timely publication of announcements related to the interpretation of the law, additional instructions on how political entities should behave during the election campaign, as well as reminders of legal obligations of actors in the election process. Unlike the Regulatory Authority of Electronic Media, which did not decide on complaints during the election campaign, the Anti-Corruption Agency initiated proceedings in several cases, and in several cases issued warning measures and published recommendations for dismissal, i.e. initiated misdemeanour proceedings. However, in this election campaign as well, numerous examples of public officials' campaigning and misuse of public resources, both by officials and political entities, went unpunished, due to certain inconsistencies in the Agency's actions, which are reflected primarily in uneven application and controversial interpretations of legal provisions while deciding on the filed complaints. Even in cases where it was found that the law had been violated, the Agency showed inconsistency in imposing sanctions on various political entities.

Election Day

The elections for MPs of the National Assembly of the Republic of Serbia were held in Serbia as a single constituency on June 21st, 2020, by applying the proportional electoral system. The distribution of mandates was done between the candidate lists that crossed the electoral threshold of three percent of all votes, using the system of the highest quotient. 6,584,376 voters registered in the voter lists had the right to vote at 8,433 polling stations in the country and abroad.

The reporting of the CRTA observation mission on the Election Day refers primarily to the quality of the process during that day and is based on information collected from more than 1,700 accredited and trained short-term observers, who were deployed in a random and representative sample of 500 polling stations. Observers monitored the Election Day from the preparation and opening of polling stations to their closing and the announcement of election results at observed polling stations. In addition to observing elections inside polling stations, certain observers deployed in 150 mobile teams monitored events in front of and around polling stations, while specially trained teams of our observers for the first time systematically monitored voting outside polling stations on a representative sample.

The Election Day passed on the verge of regularity, given the number, seriousness and territorial distribution of irregularities that can affect the election results, which were recorded in 8 to 10 percent of polling stations. The percentage of polling stations with serious irregularities and incidents is two or three times higher than on the election days of 2016 and 2017. Such an increase is worrying and indicates the need for a systematic and substantial solution to the problem in the period between election cycles. In the remaining 90 to 92 per cent of polling stations, The Election Day was largely in line with the legislative framework, with isolated irregularities.

Our analysis also shows that the quality of the election process did not call into question the election results, but that it did affect the voter turnout. Taking into account the type of irregularities and their spread throughout the country, the CRTA observation mission estimates that without their impact, the turnout would have been lower by about four per cents, while the results by lists would have remained the same, indicating that the observed irregularities were aimed at increasing turnout, but did not affect the final distribution of votes.

The most common irregularities, which were recorded at the polling station and outside them, as well as the climate in front of the polling stations, include: violating the secrecy of voting, keeping parallel voters' lists, pressure on voters, vote buying, voting without IDs and without a UV lamp check, etc. The CRTA observers recorded three cases of corruption in the election process, known as the "Bulgarian train" which the CRTA immediately reported to the police. Physical incidents were also recorded at two polling stations. There were also cases where voters could not vote because they were not registered, or the polling committees could not find their data in the voters' list.

The opening of polling stations in the parliamentary elections, as well as their closing, took place mainly in accordance with the prescribed procedures. Our observers were able to monitor the voting process at almost all polling stations in the sample. At three polling stations, they were denied access upon arrival at the polling station at the beginning of the Election Day, while at five polling stations they were denied to monitor voting during the day. Following the intervention of the CRTA legal team, in all these cases, observers were given back the right to continue to observe the Election Day at polling stations. Verbal attacks and attempts to intimidate our observers were reported at two polling stations, in Šabac and Novi Sad.

Due to the epidemiological situation, voters were given a longer period to register to vote outside the polling station, the percentage of voters who demanded to vote from home was 3.3 percent of the total number of voters who casted their ballots, which is twice as much as in previous parliamentary elections in 2016 (1.5 percent). Despite the increased number of voters who voted outside the polling station, preliminary findings indicate that this process, with isolated procedural shortcomings, went according to legal procedures.

Although, in line with measures to prevent the spread of the coronavirus, 97 percent of polling stations were provided with protective equipment, delivered at the beginning of the Election Day, along with the election

material, the CRTA observers noted that committee members and voters did not use it consistently, especially later in the day.

Post-election period

From the Election Day until the announcement of the final election results, the CRTA observation mission monitored the work of the Republic Electoral Commission in deciding on the received complaints and on repeating the elections at certain polling stations. Due to the worsening of the coronavirus situation after the Election Day, the Republic Electoral Commission switched to electronic sessions. The transition to electronic sessions meant communication by e-mail between the REC members, which made it impossible for national and foreign observers, as well as the media, to directly follow the work of this body, with the proposed agenda of sessions, as well as minutes and voting results, submitted to accredited observers electronically. After the sessions held in this way, observers, members of the Republic Electoral Commission, and accredited media representatives, had the opportunity to inspect the material from the electronic sessions held in the premises of the Expert Services of the Republic Electoral Commission.

The Republic Electoral Commission also conducted a joint debate on the complaints submitted by the CRTA observation mission, as well as on over 2,500 complaints submitted by voters, and decided without establishing the factual situation on each complaint and rejected them as unfounded. Pursuant to verdicts pronounced by the Administrative Court annulling the decisions of the Electoral Commission, decisions were made individually at the REC sessions in compliance with the provisions of the Law on General Administrative Procedure, but the outcome remained the same and the complaints were rejected.

At the session held on June 26th, the Republic Electoral Commission passed a Decision on the repeated vote at polling stations where voting had been annulled and where the repetition of voting in the elections for MPs had been ordered. In accordance with the stated decision, the voting was repeated on July 1st at 234 polling stations. Due to the worsening of the epidemiological situation and the increase in the number of infected people on the territory of Serbia, the CRTA observation mission did not observe the repeated voting, as the competent institutions, i.e. the Government of the Republic of Serbia, the Crisis Headquarters and the Republic Electoral Commission did not issue a response regarding the conditions for holding a repeated vote.

The Republic Electoral Commission announced the final results of the elections on July 5th, i.e. two weeks after the Election Day, while the preliminary results were not announced. At the time of the announcement of the final election results, the procedure for the protection of the right to vote was not completed in 34 proceedings initiated upon the complaints lodged by the CRTA, as well as in over 2,500 proceedings initiated by the voters. The election results were announced while the complainants still had the right to appeal the decisions of the REC, which is why those decisions could not become final or irrevocable. Based on that, the CRTA filed a complaint with the Republic Electoral Commission, which was rejected. This is why the CRTA filed an appeal with the Administrative Court, but it was also rejected.

Recommendations of the CRTA observation missions

Out of a total of 62 recommendations proposed by the CRTA on the basis of the findings of the monitoring process of previous election cycles, according to our assessment, 27 recommendations were fulfilled (12 completely and 15 partially), while the remaining 35 were not fulfilled. Throughout 2019, the CRTA advocated a narrowed set of 32 recommendations that were expected to be fulfilled until the elections without major obstacles. Out of these recommendations, 9 were fully met, 11 partially, while 12 recommendations remained completely unfulfilled.

The analysis of the fulfilment of all recommendations shows that mainly simpler recommendations were fulfilled, as they did not interfere with systemic changes and did not require legal changes, except in the area of preventing the misuse of public resources. Almost half of all fulfilled recommendations fall into the area of the voters' list editing, i.e. of the process transparency of the electoral process and data availability. Therefore, it can be concluded that the greatest focus on fulfilling the recommendations was on those that raise the transparency of the process, encourage voters' confidence and increase capacity and efficiency of electoral

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administration. Recommendations to prevent the misuse of public resources, ensure equality of participants and equal media representation, and ensure legal certainty and protection of the right to vote, mainly have not been adopted.

This report provides a detailed overview of all the individual changes inducing the fulfilment of the recommendations. On the basis of the observation of the entire election process in 2020, in this report the CRTA presents 18 new recommendations, which, in addition to the old ones, will be developed and advocated in the upcoming period.

10. THE CRTA'S RECOMMENDATIONS FOR THE IMPROVEMENT OF THE ELECTORAL PROCESS

Key findings

This part of the Report provides an overview of the previous recommendations proposed by the CRTA observation mission, as well as an assessment of their fulfilment. Out of a total of 62 recommendations put forward by the CRTA on the basis of the findings of the monitoring process of previous election cycles, according to our assessment, 27 recommendations were fulfilled (12 completely and 15 partially), while the remaining 35 were not fulfilled. Throughout 2019, the CRTA advocated a narrowed set of 32 recommendations that were expected to be fulfilled until the elections without major obstacles. Out of these recommendations, 9 were fully met, 11 partially, while 12 recommendations remained completely unfulfilled.

The analysis of the fulfilment of all recommendations shows that the focus of competent institutions was mainly put to fulfilment of recommendations that the CRTA advocated before the 2020 elections, but that mostly simpler recommendations were fulfilled, which did not interfere with systemic changes and did not require legal changes, except in the area of preventing the misuse of public resources. Almost half of all fulfilled recommendations (12 partially or entirely fulfilled recommendations) fall into the area of the Voters' Register editing, i.e. of the process transparency and data availability. Therefore, it can be concluded that the greatest focus on fulfilling the recommendations was on those that raise the transparency of the process, encourage voters' confidence, increase capacities and efficiency of the election administration. Recommendations to prevent the misuse of public resources, ensure equality of participants and equal media representation, and ensure legal certainty and protection of the right to vote, have not been adopted.

This report provides a detailed overview of all the individual changes as well as a statistical overview of the fulfilment of the existing recommendations. On the basis of the observation of the entire election process in 2020, in this report the CRTA presents 18 new recommendations. In the upcoming period, thanks to the fulfilment of some of the recommendations, the introduction of new ones, and the need for their systematisation, the CRTA will start revising the recommendations for the improvement of the electoral process and will inform the public about it.

10.1. Old recommendations

The CRTA systematically observed the elections and made recommendations for the improvement of the election conditions after the extraordinary parliamentary elections in 2016, the presidential elections in 2017 and the elections for the Belgrade City Assembly in 2018. Until the elections held in 2020, the CRTA had made 62 detailed recommendations available at crt.rs/recommendations. Out of these 62 recommendations, only one was filed as fulfilled before the 2020 election process. Recommendation #16 on sending complaints electronically has been implemented since 2018, while the remaining 61 recommendations have not been fulfilled until this reporting period.

During the dialogue on the improvement of the electoral conditions in 2019, the CRTA advocated a narrowed list of 32 recommendations which were expected to be implemented by the 2020 parliamentary elections, with the political will and mutual understanding of relevant actors, and without major legal interventions. Their fulfilment would have been an important start for the systematic and complete improvement of the quality of the election process. These recommendations are highlighted in a special document "The CRTA recommendations for the improvement of the electoral conditions by 2020."

In the table, the recommendations that the CRTA advocated for the 2020 elections are shaded, while the degree of their fulfilment is marked with "traffic lights" colours.

#10 Advocated recommendations for 2020

fulfilled partially fulfilled unfulfilled

No.	Recommendation	Fulfilment
#1	SYSTEMATISE THE ELECTORAL LEGAL MATTER THROUGH A UNIQUE ELECTION LAW	unfulfilled
#2	REORGANISE THE ELECTION ADMINISTRATION SYSTEM	unfulfilled
#3	REFORM THE REC WITHIN A WIDER SET OF REFORMS OF THE ELECTION LAW	unfulfilled
#4	SEPARATE THE PROCESS OF THE ELECTORAL LISTS SUBMISSION AND THE OFFICIAL COMMENCEMENT OF THE ELECTION CAMPAIGN	unfulfilled
#5	MEMBERS OF LOCAL ELECTORAL COMMISSIONS CAN BE ONLY JURISTS	unfulfilled
#6	INTRODUCE THE OBLIGATION THAT THE HOLDER OF THE LIST BE A CANDIDATE IN THE LOCAL ELECTIONS	unfulfilled
#7	UNIFY DEADLINES PROVIDED FOR THE ANNOUNCEMENT OF FINAL ELECTION RESULTS	unfulfilled
#8	REGULATE BY THE LAW THE INSPECTION OF BAGS CONTAINING THE ELECTION MATERIAL	unfulfilled
#9	INTRODUCE COMPULSORY TRAININGS AND TESTS FOR ALL MEMBERS OF THE POLLING STATION COMMITTEES	partially fulfilled
#10	ADOPT A RULEBOOK FOR EDUCATORS PROVIDING TRAININGS FOR ALL MEMBERS OF THE POLLING STATION COMMITTEES	fulfilled
#11	REORGANISE THE COMPOSITION OF THE POLLING STATION COMMITTEES – PARTIES THAT DO NOT HAVE MEMBERS IN THE PERMANENT COMPOSITION CANNOT HAVE MEMBERS IN THE EXTENDED COMPOSITION	unfulfilled
#12	PUBLISH SCANNED MINUTES OF THE WORK OF THE POLLING STATION COMMITTEES ON THE ELECTORAL COMMISSIONS' WEBSITES ON TIME	fulfilled
#13	PUBLISH ALL DOCUMENTS FROM PLENARY AND WORK GROUPS SESSIONS ON THE REC WEBSITE ON TIME	partially fulfilled
#14	BROADCAST ALL REC SESSIONS LIVE, PUBLISH STENOGRAPHIC NOTES AND RESULTS OF THE VOTE AT THE ELECTORAL COMMISSION SESSIONS ON TIME	partially fulfilled
#15	ENSURE THAT PERSONAL DATA IS CHECKED UPON THE VOTER'S REQUEST	partially fulfilled
#16	ENABLE SENDING COMPLAINTS ELECTRONICALLY	fulfilled (2018)
#17	UPDATE THE VOTERS' REGISTER	partially fulfilled
#18	ORGANISE CONTINUOUS TRAININGS FOR PERSONS IN CHARGE OF UPDATING THE VOTERS' REGISTER	fulfilled

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#19	IMPROVE OVERSIGHT OVER THE WORK OF PERSONS HANDLING THE VOTERS' REGISTER	fulfilled
#20	IMPROVE THE COORDINATION BETWEEN THE OFFICE OF VITAL RECORDS AND SERVICES IN CHARGE OF THE VOTERS' REGISTER	fulfilled
#21	FACILITATE CITIZENS' PROCEDURES FOR UPDATING DATA IN THE VOTERS' REGISTER	partially fulfilled
#22	CLARIFY THE CONCEPT OF PUBLIC RESOURCES AND ADEQUATE SANCTIONS IN THE ANTI-CORRUPTION AGENCY ACT	fulfilled
#23	DEFINE WHICH ACTIVITIES CAN BE INCLUDED IN THE COST OF THE ELECTION CAMPAIGN	fulfilled
#24	INTRODUCE A SANCTION FOR THE MISUSE OF PROPERTY, NAMES AND ACTIVITIES OF PUBLIC COMPANIES FOR POLITICAL PURPOSES	fulfilled
#25	PROHIBIT ALL PUBLIC SERVANTS AND OFFICIALS OF ALL LEVELS TO APPEAR AT PUBLIC EVENTS IN THE ELECTION CAMPAIGN WHICH PROMOTE THE PLANS OR RESULTS OF THE WORK OF PUBLIC BODIES, ORGANISATIONS AND PUBLIC SERVICES	unfulfilled
#26	THE AGENCY SHALL USE STATUTORY POWERS EX OFFICIO IN ORDER TO PROTECT THE PUBLIC INTEREST	unfulfilled
#27	BAN ON THE EXTRAORDINARY ALLOCATION OF BUDGET AND OTHER PUBLIC FUNDS DURING THE ELECTION CAMPAIGN, AS WELL AS IN THE PERIOD OF 30 DAYS BEFORE AND AFTER THE CAMPAIGN	unfulfilled
#28	FORBID THE USE OF FUNDS FOR THE REGULAR OPERATION OF POLITICAL ENTITIES FOR THE PURPOSES OF THE ELECTION CAMPAIGN	unfulfilled
#29	MANDATORY SUBMISSION OF PROVISIONAL REPORTS ON THE COST OF THE ELECTION CAMPAIGN DURING THE VERY CAMPAIGN	unfulfilled
#30	REGULATE BY LAW AND BY A SPECIAL CHAPTER IN THE LAW, THE POSITION OF THE OBSERVERS AND THEIR AUTHORITY IN ACCORDANCE WITH INTERNATIONAL STANDARDS	partially fulfilled
#31	AWARD AUTHORITY TO OBSERVERS TO ENTER COMPLAINTS TO THE MINUTES ON THE WORK OF THE POLLING STATION COMMITTEES	unfulfilled
#32	DEFINING THE MANNER AND DEADLINES FOR AWARDED ACCREDITATIONS TO OBSERVERS	partially fulfilled
#33	DEFINE THE CONDITIONS WHICH ORGANISATIONS AND ASSOCIATIONS MUST FULFILL IN ORDER TO OBSERVE THE ELECTION PROCESS	unfulfilled
#34	PRECISELY DEFINE THE TIME OF THE OBSERVATION PERIOD FOR WHICH ACCREDITATION IS ISSUED	unfulfilled
#35	OBLIGE THE REM TO REPORT TO THE PUBLIC ON THE WORK OF BROADCASTERS DURING AND AFTER THE ELECTION CAMPAIGN	partially fulfilled
#36	INTRODUCE THE OBLIGATION TO WRITE A REASONING ACCOMPANYING THE DECISIONS REGARDING VIOLATIONS OF THE GENERAL INTEREST	unfulfilled
#37	INTRODUCE THE OBLIGATION TO INCLUDE IN THE REASONING REPORTS FROM THE EXPERT SERVICE FOR MONITORING AND ANALYSIS	unfulfilled
#38	INTRODUCE CLEAR INDICATORS FOR THE EVALUATION OF THE WORK OF THE REM COUNCIL	unfulfilled
#39	EXTEND THE DEADLINE FOR MAKING DECISIONS AND SUBMITTING OBJECTIONS	unfulfilled
#40	EXTEND THE DEADLINE FOR FILING COMPLAINTS TO THE ADMINISTRATIVE COURT	unfulfilled

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#41	EXPAND THE POSSIBILITIES OF THE ELECTORAL COMMISSIONS AND OF THE ADMINISTRATIVE COURT TO CONSIDER THE PROPOSED EVIDENCE ATTACHED TO THE OBJECTION	unfulfilled
#42	COMPULSORY REPEAT THE ELECTIONS AT A POLLING STATION WHENEVER THERE IS A DISCREPANCY BETWEEN THE MINUTES ON THE WORK OF THE POLLING STATION COMMITTEE AND THE FACTUAL STATE DETERMINED BY THE REC/CEC/ADMINISTRATIVE COURT	partially fulfilled
#43	IDENTIFY CASES WHERE THE ELECTORAL COMMISSIONS ARE ALLOWED TO ACT EX OFFICIO	unfulfilled
#44	TIMELY PUBLISH PRELIMINARY AND FINAL RESULTS OF THE ELECTIONS BY POLLING STATIONS ON THE ELECTION COMMISSIONS' WEBSITES	unfulfilled
#45	INTRODUCE LEGAL PROHIBITION TO COERCE PRESSURES ON EMPLOYEES IN PUBLIC COMPANIES AND PUBLIC ADMINISTRATION	partially fulfilled
#46	IMPROVE THE PROTECTION OF PERSONAL DATA OF CITIZENS IN ORDER TO PREVENT ELECTORAL PRESSURE	unfulfilled
#47	INTRODUCE SHORT DEADLINES FOR DECISION-MAKING BY THE AGENCY AND THE REM UPON OBJECTIONS	partially fulfilled
#48	DIRECTLY PROHIBIT BY THE LAW PARALLEL EVIDENCE AT THE POLLING STATION AS THEY JEOPARDISE THE SECRECY OF VOTING	unfulfilled
#49	SET UP STANDARDS FOR VOTING OF BLIND AND VISUALLY IMPAIRED PERSONS	fulfilled
#50	CONDUCT ELECTIONS IN KOSOVO IN ACCORDANCE WITH THE LAW AND DECISIONS OF THE CONSTITUTIONAL COURT	unfulfilled
#51	EQUALISE DEADLINES FOR CONDUCTING ELECTIONS	unfulfilled
#52	OBLIGATE THE CONSTITUTIONAL COURT TO DECIDE ON CASES PERTAINING TO THE ELECTIONS WITHIN 5 DAYS	unfulfilled
#53	PUBLISH INFORMATION ABOUT THE VOTERS' REGISTER UPDATE PROCESS ON THE WEBSITE OF THE MINISTRY OF PUBLIC ADMINISTRATION AND LOCAL SELF-GOVERNMENT	fulfilled
#54	PROHIBIT SUBSEQUENT MODIFICATIONS TO THE MINUTES ON THE WORK OF POLLING STATION COMMITTEES	fulfilled
#55	LIBERALISE THE CONDITION FOR OPENING OF POLLING STATIONS ABROAD	unfulfilled
#56	DEFINE THE METHOD OF SUBMITTING VOTING NOTIFICATION	unfulfilled
#57	DEFINE MORE CLEARLY THE POSITION OF NATIONAL MINORITY PARTIES	unfulfilled
#58	EXPAND THE SCOPE OF OFFENSES AGAINST ELECTORAL RIGHTS IN THE LAW ON CRIMINAL PROCEEDINGS	unfulfilled
#59	EXPAND THE RANGE OF PENALTIES IMPOSED BY THE REM TO BROADCASTERS WHO DO NOT FOLLOW THE RULES DURING THE CAMPAIGN	unfulfilled
#60	INTRODUCE EDUCATIONAL CAMPAIGN FOR CITIZENS ABOUT ELECTION RULES AND PROCEDURES	partially fulfilled
#61	OPEN A PUBLIC HEARING IN THE PREPARATION OF A NEW RULEBOOK ON THE OBLIGATIONS OF MEDIA SERVICE PROVIDERS DURING THE ELECTION CAMPAIGN	partially fulfilled
#62	ANNOUNCE A PUBLIC CALL FOR PROPOSING CANDIDATES FOR VACANCIES IN THE COUNCIL AND INITIATE THE PROCEDURE FOR REVIEWING RESPONSIBILITIES IN THE WORK OF THE REM COUNCIL MEMBERS	partially fulfilled

10.2. Fulfilment of old recommendations

Out of the total of 62 recommendations formulated by the CRTA from 2016 to 2019, including the election process completed in June 2020, according to the CRTA, 12 recommendations were fulfilled in their entirety, and 15 recommendations were partially fulfilled, while most of them, i.e. the remaining 35 recommendations were not fulfilled.

Of the narrower set of 32 recommendations that the CRTA specifically advocated during 2019, a total of 20, i.e. 62.5 percent were fulfilled or partially fulfilled, while the partial or complete fulfilment of other recommendations was only 23.3 percent. We should remind once again that these recommendations were advocated because there were no major obstacles to their fulfilment in the period up to the 2020 elections, and in that sense the statistics of fulfilment of recommendations show the election administration's focus on the most politically prominent recommendations that could have optimally been fulfilled in less than a year.

Table 12. Fulfilment of recommendations by their status

Status of the recommendation	Degree of fulfilment	Frequency	Percentage	Cumulative percentage
Advocated for 2020	Fulfilled	9	28.1	28.1
	Partially fulfilled	11	34.4	62.5
	Unfulfilled	12	37.5	100
	<i>Total</i>	<i>32</i>	<i>100</i>	
Other	Fulfilled	3	10	10
	Partially fulfilled	4	13.3	23.3
	Unfulfilled	23	76.7	100
	<i>Total</i>	<i>30</i>	<i>100</i>	

On the other hand, the statistics of fulfilment of recommendations by the complexity of their fulfilment show a different picture. The degree of complexity in fulfilling the recommendations was assessed depending on the degree of systemic changes that needed to be made in the election practice and the legal provisions that needed to be changed for that purpose. The data show that complete fulfilment occurred mainly with less exigent recommendations, while not a single more complex recommendation was adopted. The highest percentage of partial or complete fulfilment was recorded with the least complex recommendations (62.5%).

Table 13. Fulfilment of recommendations by complexity

Complexity of the recommendation	Degree of fulfilment	Frequency	Percentage	Cumulative percentage
Very complex	Fulfilled	0	0	0
	Partially fulfilled	5	38.5	38.5
	Unfulfilled	8	61.5	100
	<i>Total</i>	<i>13</i>	<i>100</i>	
Averagely complex	Fulfilled	3	12	12
	Partially fulfilled	4	16	28
	Unfulfilled	18	72	100
	<i>Total</i>	<i>25</i>	<i>100</i>	
Less complex	Fulfilled	9	37.5	37.5
	Partially fulfilled	6	25	62.5
	Unfulfilled	9	37.5	100
	<i>Total</i>	<i>24</i>	<i>100</i>	

If we consider the fulfilment of recommendations by areas of the election process they cover, it is noticeable that the highest fulfilment of recommendations (both complete and partial) occurred in the area of the Voters' Registers (100%), followed by recommendations aimed at encouraging transparency of the election process and data availability (85.7%). Recommendations in all other areas were completely or partially fulfilled in less than 50% of cases, and the least in the areas of protection of the right to vote, the Election Day elections and the election legislation and election administration (only 20%).

Table 14. Fulfilment of recommendations by area

Area of the recommendation	Degree of fulfilment	Frequency	Percentage
Voters' Register	Fulfilled, partially fulfilled	6	100
	Unfulfilled	0	0
	<i>Total</i>	<i>6</i>	<i>100</i>
Transparency of the election process and data availability	Fulfilled, partially fulfilled	6	85.7
	Unfulfilled	1	14.3
	<i>Total</i>	<i>7</i>	<i>100</i>
Media	Fulfilled, partially fulfilled	3	42.9
	Unfulfilled	4	57.1
	<i>Total</i>	<i>7</i>	<i>100</i>
Observers' position	Fulfilled, partially fulfilled	2	40
	Unfulfilled	3	60
	<i>Total</i>	<i>5</i>	<i>100</i>
Behaviour of campaign actors	Fulfilled, partially fulfilled	3	37.5

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	Unfulfilled	5	62.5
	<i>Total</i>	8	100
Objections; complaints and protection of the right to vote	Fulfilled, partially fulfilled	3	30
	Unfulfilled	7	70
	<i>Total</i>	10	100
Election Day	Fulfilled, partially fulfilled	1	25
	Unfulfilled	3	75
	<i>Total</i>	4	100
Electoral legislation and electoral administration	Fulfilled, partially fulfilled	3	20
	Unfulfilled	12	80
	<i>Total</i>	15	100

Consequently, it does not come as a surprise that the recommendations aimed at transparency of the process and voter confidence were the most fulfilled, with 50% of partially fulfilled and 22.2% of entirely fulfilled recommendations, accompanied by the capacity and efficiency of the election administration. Preventing the misuse of public resources is the next category, in which three recommendations have been fully implemented, while four have not. None of the recommendations in the field of equality of participants and equal media representation has been fully implemented, while the lowest fulfilment of recommendations was in those aimed at greater legal certainty and protection of the electoral right.

Table 15. Fulfilment of recommendations by their goals

Goal of the recommendation	Degree of fulfilment	Frequency	Percentage	Cumulative percentage
Process transparency and voters' confidence	Fulfilled	4	22.2	22.2
	Partially fulfilled	9	50	72.2
	Unfulfilled	5	27.8	100
	<i>Total</i>	18	100	
Capacity and efficiency of the election administration	Fulfilled	3	37.5	37.5
	Partially fulfilled	1	12.5	50
	Unfulfilled	4	50	100
	<i>Total</i>	8	100	
Preventing the misuse of public resources	Fulfilled	3	42.9	42.9
	Partially fulfilled	0	0	42.9
	Unfulfilled	4	57.1	100
	<i>Total</i>	7	100	
Equality of participants and equal media representation	Fulfilled	0	0	0
	Partially fulfilled	3	27.3	27.3
	Unfulfilled	8	72.7	100

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	<i>Total</i>	<i>11</i>	<i>100</i>	
Legal security and protection of the electoral right	Fulfilled	2	11.1	11.1
	Partially fulfilled	2	11.1	22.2
	Unfulfilled	14	77.8	100
	<i>Total</i>	<i>18</i>	<i>100</i>	

Below is a description of the fulfilment of all individual recommendations, regardless of whether they are partially fulfilled or entirely fulfilled. A detailed classification of these recommendations can also be found on the CRTA website.

Table 16. Description of fulfilment of old recommendations

PRESCRIBE BY THE LAW OBLIGATORY TRAININGS AND EXAMS FOR THE MEMBERS OF ELECTORAL COMMITTEES	
#9	Amend article 34 of the Law on the Election of Members of the Parliament and article 15 of the Law on Local Elections prescribing new competencies to the REC / MEC / CEC, to organise in the pre-election period, a compulsory training for all members of polling station committees about rules and procedures for the work of polling station committees. It is particularly important to establish an exam system for candidates for permanent composition of a polling station committee, as this should result in a larger capacities of polling station committees to conduct the elections.
partially fulfilled	It is foreseen by a Conclusion dated December 2 nd , 2020, i.e. a by-law, that trainings for work in polling stations should be held, while the process of organising and conducting trainings is specified by the Decision on organising and conducting trainings for work in the permanent composition of polling stations dated December 20 th , 2020. A training programme, a manual, a presentation accompanying the manual, as well as exercises to check the knowledge of the participants were conceived. The decision stipulates that the trainings be conducted in the period beginning on January 30 th , 2020. There are no data on the number of people who successfully completed the training. Since the obligation to train and test polling station members was implemented through a by-law, and since no obligation was introduced that only trained persons could be members of polling stations, this recommendation is considered to be only partially fulfilled.
ADOPT THE RULEBOOK FOR EDUCATORS FOR POLLING STATION COMMITTEES' MEMBERS TRAINING	
#10	It is necessary that all electoral commissions adopt, as a by-law, the Rulebook on procedures and criteria for selection and engagement of consultants, trainers and educators for polling stations committees' members training. The adoption of the said Rulebook is indispensable in order to conduct such training by independent experts in the field of electoral legislature.
fulfilled	Since the Decision on the organisation and implementation of trainings for work in the permanent composition of polling stations and the Training Programme were adopted by the REC on December 20 th , 2019, this recommendation can be considered fulfilled. There is no information that local electoral commissions have assumed this recommendation.
TIMELY PUBLISHING OF SCANNED MINUTES OF THE WORK OF POLLING STATION COMMITTEES ON THE REC WEB-SITE	
#12	The following regulation should be added to the section of the Instructions for Conducting the Elections "Statistical processing and announcement of the election results": "After the announcement of preliminary results of the election and after the reception of the Minutes on the Work of Polling Station Committees from all polling stations, the Minutes are published on the web-site of the Republic Electoral Commission." Published Minutes should have metadata, or otherwise allow the search of Minutes by polling station.
fulfilled	By adopting the Conclusion on measures for the improvement of the election process from December 2 nd , 2020, the REC has formally undertaken the obligation to publish the Minutes on the Work of Polling Station Committees. The recommendation was implemented by publishing the Minutes on the Work of Polling Station Committees, which were published in their entirety, but not in a timely manner. The Minutes were published after the deadline for objections and were published in their entirety just over two weeks after the Election Day.

TIMELY PUBLISHING OF ALL DOCUMENTS FROM PLENARY ASSEMBLIES AND THE ASSEMBLIES OF WORKING GROUPS ON THE REC WEB-SITE	
#13	Change the practice of the republic, municipal and city electoral commissions so that all materials and documents from the REC plenary assemblies and the meetings of the REC working groups would be published in the format which is appropriate for further use (e.g. CSV, DOC, XLS) on the corresponding web-site of the said commissions.
partially fulfilled	The REC started publishing the decisions on complaints as well as all adopted documents from the REC sessions. However, the draft working documents, the agenda, the report on voting from the sessions were not published during the 2020 election process.
LIVE COVERAGE OF THE REC ASSEMBLIES AND TIMELY PUBLICATION OF SHORTHAND NOTES AND THE RESULTS OF THE VOTE AT THE COMMISSION SESSIONS	
#14	Technical capacities and resources of the REC should be updated so that every assembly could be available in live edition on the REC web-site. Apart from the live Internet broadcast, it is necessary to provide an archive of recordings which will be available on the REC web-site. Besides, it is necessary to supplement the REC Rulebook with a regulation which anticipates publication of transcripts from every REC assembly on the REC web-site, as well as the results of the election in a format appropriate for further use (e.g. CSV, DOC, XLS). A necessary precondition for the implementation of this recommendation is the improvement of technical, informational and professional capacities of the Expert Service of the National Assembly of the Republic of Serbia, as well as the general improvement of the internal system for submitting materials for sessions of republic, municipal and city electoral commissions.
partially fulfilled	The REC has adopted the practice of live coverage of plenary sessions and of the procedure for submitting electoral lists, as well as of publishing footages in the archives on the website. The results of the voting and the shorthand notes were not published in any way during the 2020 election process.
ENABLE VERIFICATION OF THE USE OF PERSONAL DATA UPON REQUESTS OF VOTERS	
#15	Change the REC practice so that voters are enabled, upon request, to gain an insight into the Voters' Register excerpt and/or other documents which contain citizens' personal data, in order to cast away any doubt that persons who are not entered into the Voters' Register voted, or persons who are entered in the Voters' Register but who have passed away or who have not lived in Serbia for a long time.
partially fulfilled	Voters were allowed to check the excerpt from the Voters' Register in two ways: to perform a direct inspection, and to ask the REC whether they had voted. The REC also responded to voters' inquiries regarding whether the voter had given a supporting signature to any of the lists. The recommendation is considered to be partially fulfilled due to the irregular response of the REC to voters' inquiries, i.e. the lack of a binding deadline for submitting the requested information.
ENABLE SENDING COMPLAINTS ELECTRONICALLY	
#16	Thanks to the application of the provisions of the new Law on General Administrative Procedure, the CEC allowed sending of complaints electronically.
fulfilled	In the previous period, thanks to the application of the provisions of the new Law on General Administrative Procedure, it was allowed to send complaints electronically, and therefore the CRTA, after the election for councillors of the Belgrade City Assembly, marked this recommendation as fulfilled. The CRTA has no information on whether in 2020 the REC acted on electronically signed submissions, nor whether such submissions were sent to the REC during the election process. The status of the recommendation will be changed if new findings become available.

UPDATE THE VOTERS' REGISTER	
#17	The implementation of this recommendation implies forming of an expert working group which would consist of all relevant participants with the aim of improving the mechanism for regular and comprehensive updating and revision of the Voters' Register. The aforementioned working group would aim to determine the best solutions that would enable a quality updating of the Voters' Register and a stable and regular communication between all relevant state institutions and services.
partially fulfilled	Thanks to the electronic connection of birth and marriage registers with the Unified Voters' Register, its updating has been improved in terms of reducing the number of possible errors that occur when entering data. In order to improve the transparency of the Voters' Register update process and voters' confidence in the quality of the update, it would be useful to periodically publish changes by type of change (data change, registration, deletion, etc.) by local self-government units. The stated statistical presentation of changes could be published by the Ministry of Public Administration and Local Self-Government on the page of the site dedicated to the Voters' Register. We distinguish the process of updating the Voters' Register from the process of verification of the Voters' Register, which refers to the independent and systematic verification of data in the Voters' Register. The update process refers to the entry of data to the Voters' Register, while verification means checking the authenticity of already entered data. In terms of progress in the process of verifying the Voters' Register, on September 26 th , 2019, the Government of Serbia made a decision on the formation of a working group for the verification of the Voters' Register. The working group, as well as the subgroups for legal issues and statistical support, held several meetings until the end of 2019, after which the Verification Methodology was sent to the Commissioner for an opinion. Since the Commissioner was not provided with an opinion on the Data Processing Impact Assessment, which is envisaged by the Government Decision as a step prior to the adoption of the Methodology, on December 24 th , 2019 the Commissioner informed the working group that the conditions for determining the methodology had not been met. In May 2020, the Ministry of Public Administration and Local Self-Government prepared the Data Processing Impact Assessment within the process of verification of the Voters' Register, and submitted to the CRTA together with the latest version of the Draft Methodology. Until mid-September 2020, this document had not been submitted to the Commissioner for an opinion, because the members of the working group on the Assessment itself are still voting.
ORGANISE A CONTINUOUS TRAINING FOR OFFICERS WHO UPDATE THE VOTERS' REGISTER	
#18	Conceive and organise trainings for all employees of the Ministry of the Public Administration and the Local Self-Government and units of the local self-government who update the Unified Voters' Register so that potential problems during the updating or revision of the Voters' Register would be avoided.
fulfilled	In the period from September 18 th , 2019 to October 17 th , 2019, the Ministry of Public Administration and Local Self-Government held several training sessions for employees keeping and updating the Unified Voters' Register, as well as trainings related to the Unified Voters' Register for registrars. The Manual for the implementation of the Law on Unified Voters' Register was published in December.
IMPROVE SURVEILLANCE OF THE WORK OF PERSONS MANAGING THE VOTERS' REGISTER	
#19	Improve the work of the Administrative Inspectorate so that there is a regular and additional administrative surveillance of the work of employees who participate in the process of updating the Voters' Register.
fulfilled	The annual reports of the Administrative Inspectorate from 2018 and 2019 show that in 2018, there were a total of 24 inspections of the work on updating the Unified Voters' Register, and 94 measures were imposed. On the other hand, in 2019, 520 inspections were performed and 644 measures imposed. Although these data are not sufficient to talk about the improvement of the procedure, this does indicate an important change in practice, and this recommendation is therefore considered to be fulfilled.

IMPROVE THE COORDINATION BETWEEN REGISTRARS' OFFICES AND OFFICES IN CHARGE OF THE VOTERS' REGISTER	
#20	The implementation of this recommendation implies modifications in the work of competent services. A better coordination between registrar's offices and offices in charge of the Voters' Register is needed, as well as a consistent application of punitive regulations towards a responsible person within the institution in charge of updating the Voters' Register in case the roll is not accurate, up-to-date and in accordance with the Law on the Unified Voters' Register.
fulfilled	During 2019, the Ministry of Public Administration and Local Self-Government electronically connected the Register of marriages and the Register of deaths with the Unified Voters' Register, so that the registrar, after entering a death or a marriage in the registry books, ex officio, electronically sends all data to the employees who are working on the Voters' Register updating process. As part of the training for employees working on the Voters' Register, registrar trainings were also conducted.
FACILITATE CITIZENS' PROCEDURES FOR UPDATING DATA IN THE VOTERS' REGISTER	
#21	It is necessary that the Ministry of Public Administration and Local Self-Government, but also all local self-governments, publish the form for registration in the Voters' Register on their websites and inform the citizens about the possibilities to electronically send the completed form with a copy of a valid personal document.
partially fulfilled	Local self-governments units have shown an uneven practice of publishing forms for submitting requests for changes, both on their official portals and on the e-Government portal. Some local self-governments units did not publish their forms on both portals, and it was noticed that the forms differed in some cases.
CLEARLY DETERMINE THE NOTION OF PUBLIC RESOURCES AND ADEQUATE SANCTIONS IN THE ANTI-CORRUPTION AGENCY ACT	
#22	It is necessary to define more precisely the notion of public resources within the Anti-Corruption Agency Act. Such defined notion would also be in accordance with the best comparative practices in the context of preventing of the misuse of public resources and public functions. In this way, it would be possible to strictly implement article 29 of the Act, and, at the same time, there would be an adequate legal basis for imposing sanctions. In addition to the existing pecuniary fines, heavier fines should be considered the same as the increase in disciplinary action, which would also be possible if the Anti-Corruption Agency Act were amended.
fulfilled	Amendments to the Anti-Corruption Agency Act and the Law on Prevention of Corruption, adopted in December 2019, define the concept of public resources more precisely. In this way, this recommendation was fulfilled, which has, in combination with the introduction of short deadlines to undertake actions in the campaign, somewhat improved the Agency's actions on complaints. The interpretation of these provisions by the Agency remained controversial in certain proceedings against public officials. Another novelty is the stiffening of the minimum threatened fines for officials who abuse public resources from 50,000 to 100,000 dinars. The maximum fine still remains 150,000 dinars.
DEFINE WHICH ACTIVITIES CAN BE INTEGRATED INTO THE ELECTION CAMPAIGN COST	
#23	Amend article 23 of the Law on Financing of Political Activities with concrete cases that prescribe types of activities that can be introduced under electoral campaign costs. Having in mind that the Law prescribes types of costs relating to regular activities of a political entity, it is also necessary to standardise types of electoral campaign costs.
fulfilled	This recommendation was fulfilled by the adoption of the Law on Amendments to the Law on Financing Political Activities in December 2019. The law now lists the most important activities the costs of which are considered election campaign expenses, leaving room for some other activities that are not explicitly enumerated, but the costs of which are unequivocally related to the election campaign. Election campaign costs defined in this way, with a timeline that is still retained in the Law, will greatly facilitate the control of election campaign financing.

INTRODUCE SANCTIONS FOR MISUSE OF PROPERTY, NAMES AND ACTIVITIES OF PUBLIC COMPANIES IN POLITICAL PURPOSES	
#24	Provide, through an amendment to the Law on Public Companies, sanctions for political entities and accountable persons in public companies in case of violation of article 70 of the Law on Public Companies that prescribes the prohibition of the use of property, activity, name and visual identity of a public company in all activities related to political parties and electoral campaigns, as well as all other use of public companies for political purposes.
fulfilled	This recommendation was adopted with the adoption of the Law on Amendments to the Law on Public Companies in December 2019. The responsibility of the director who uses the resources of the public company for the promotion of political parties, i.e. political entities, has been specified, which especially implies the use of official premises, vehicles and inventory of the public company free of charge. In addition, the director shall be dismissed if he is aware that his employees or otherwise employed personnel are abusing the public resources of the company for political and party purposes, and they do not take actions to prevent it.
REGULATE THE STATUS OF OBSERVERS AND THEIR AUTHORITY BY THE LAW AND BY SPECIAL CHAPTERS IN THE LAW IN ACCORDANCE WITH INTERNATIONAL STANDARDS	
#30	It is necessary to supplement the Law on the Election of Members of the Parliament by adding a special chapter that would, together with the amendments to the Law on Local Elections, be applied to the local elections as well, and would regulate the status and position of observers in accordance with the best international standards (for example: paragraph 8 of the OSCE Copenhagen Document adopted in 1990 and paragraph II 3.2 of the Code of Good Practice). The amendments to the law would contain an itemised list of electoral bodies' actions and activities that observers can monitor – i.e. their authorities. Besides, a separate chapter would explicitly prescribe the number of observers who can monitor the work of the electoral bodies. In accordance with the best international practices, the work of polling station committees and of electoral commissions should not be monitored by more than two observers simultaneously. Furthermore, a special chapter of the law would demarcate the notions of long-term and short-term observers. The notion of a short-term observer would imply a person who monitors uniquely the work of the polling station committee on the Election Day. On the other hand, the notion of a long-term observer would imply a person who monitors the entire election campaign and the work of the electoral commissions.
partially fulfilled	The status and position of observers, actions and activities of election bodies that observers can observe are more precisely prescribed by the Instruction for the Conduct of Voting at the elections for MPs of the National Assembly scheduled for June 21 st , 2020, however, these provisions were not included in the law.
DEFINING THE MANNER AND DEADLINES FOR AWARDING ACCREDITATIONS TO OBSERVERS	
#32	In the course of its work so far, the CRTA observation mission has faced a variety of actions in determining the fulfilment of the conditions for monitoring the elections and the process of accreditation itself. According to the best international practice, the decision on the allocation of accreditations and on the fulfilment of the conditions for observation of the elections should be made at the first following session or 5 days upon submission of the necessary registration documents at the latest. The full implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament as follows: "The REC establishes that the applicant has fulfilled all conditions imposed for the election observation (domestic and/or international observers) at the first session following the submission of the necessary documents. The day following the establishing of fulfilment of all conditions, the competent service of the REC delivers to the applicant adequate accreditations for observing the work of the electoral bodies."
partially fulfilled	In the Instructions for Conducting the Elections in the 2020 election cycle, the REC foresaw that the applications for observation would be considered at the session following the receipt of the application. Moreover, the Instructions stipulate that accreditations be granted to observers within 48 hours from the end of the session at which it was determined that the organisation that had submitted the application for observer status met all the conditions prescribed by the Instructions. Practice has shown that the prescribed deadline is effectively respected. The

	<p>recommendation is considered partially fulfilled, because the proposed change was implemented at the level of a by-law, not a law.</p>
<p>OBLIGE THE REM TO INFORM THE PUBLIC ON THE WORK OF BROADCASTERS DURING AND AFTER THE ELECTION CAMPAIGN</p>	
#35	<p>Introduce an obligation to the REM to periodically, ideally once a fortnight, issue written reports about monitoring and analysis of the work of electronic media in the pre-election period. Those reports must contain findings of the competent service of the REM regarding the equal representation of candidates, i.e. electoral lists in the media, media reporting about the candidates' activities, records of public appearances of stakeholders in their capacity of public officials and candidates, as well as other important aspects of media that may have an impact on an objective and comprehensive informing of citizens about the candidates and the election programmes. Furthermore, the REM must be obliged to publish the final report on the work of electronic media during the electoral campaign one month after the final results announcement at the latest.</p>
partially fulfilled	<p>The recommendation was partially fulfilled, because the REM monitored the programmes of media service providers and reported on a weekly basis on the quantitative representation of actors in the election programmes of the observed media service providers. On the other hand, the legal framework has not changed, and the REM still has no legal obligation to publish such reports.</p>
<p>COMPULSORY REPEAT THE ELECTIONS AT A POLLING STATION WHENEVER THERE IS A DISCREPANCY BETWEEN THE MINUTES ON THE WORK OF THE POLLING STATION COMMITTEE AND THE FACTUAL STATE DETERMINED BY THE REC/CEC/ADMINISTRATIVE COURT</p>	
#42	<p>Supplement the Law on the Election of Members of the Parliament and the Law on Local Elections towards mandatory repetition of elections at polling stations when the REC or the Administrative Court determine that the results from the Minutes on the Work of the polling station committees do not match the actual state of the election material. The electoral commission would be given authority to make the decision about repetition of elections.</p>
partially fulfilled	<p>The Instructions for Conducting the Elections in the 2020 election process foresees cases when elections are repeated due to incomplete minutes on the work of polling stations. Since the cases are not provided by the law, and they do not relate to the determination of results by inspecting the election material, this recommendation can be considered only partially fulfilled.</p>
<p>INTRODUCE LEGAL PROHIBITION OF PRESSURE ON EMPLOYEES IN PUBLIC COMPANIES AND PUBLIC ADMINISTRATION</p>	
#45	<p>Different types of pressure on voters by candidates/participants in the elections are a growing problem in the election process. In this regard, the recommendations of the Venice Commission stipulate that state authorities can make clear instructions that would foresee that no pressure on officials will be tolerated, that no one should fear for their employment because they support or do not support a particular candidate or a political party, and that officers must enjoy protection from any intimidation or pressure. It is necessary to amend the Law on Public Companies and the Law on Local Self-Government in order to forbid pressures on employees in public administration and public companies, as well as to oblige public administration and public companies to additionally prescribe sanctions for cases of pressure on employees by their internal acts.</p>

partially fulfilled	Article 49, paragraph 4 of the Law on Public Companies has been amended by specifying that unscrupulous conduct of directors, which is the basis for dismissal, may also imply exerting pressure on employees and otherwise engaged personnel in a public company in connection with support to political entities or candidates in the elections. The amendments also include situations in which a director was aware that an employee or otherwise employed personnel used the resources of the public company to promote political parties or political entities, but took no action despite his/her competence to prevent it. Other cases of pressure have not been regulated, so that this recommendation can be considered only partially fulfilled.
INTRODUCING SHORT DEADLINES FOR THE AGENCY AND THE REM TO ACT ON COMPLAINTS	
#47	In order to make the control of the election campaign efficient, it is necessary to determine short deadlines that would enable the Anti-Corruption Agency and the REM to act on complaints during the campaign, which can be done by supplementing the Anti-Corruption Agency Act and the Law on Electronic Media.
partially fulfilled	This recommendation has only been partially fulfilled and just in the part related to the Anti-Corruption Agency. Amendments to the Anti-Corruption Agency Act (Law on Prevention of Corruption) and the Law on Financing Political Activities introduced short deadlines (three-day deadlines) for making decisions on complaints submitted due to violations of the law during the election campaign. Deadlines for the REM to act in electoral processes have not been specified.
SET UP STANDARDS FOR VOTING OF BLIND AND VISUALLY IMPAIRED PERSONS	
#49	In the previous practice of conducting the elections, by-laws and the accompanying regulations did not contain provisions on the implementation of standards that would allow voting of blind and visually impaired persons. In this respect, the adoption of by-laws (the Instructions for Conducting the Elections and the Rulebook on the Work of Polling Stations Committees) should include the aforementioned standards to ensure that blind and visually impaired persons exercise their voting rights appropriately.
fulfilled	The Rulebook on the Work of Polling Stations Committees have been supplemented with recommendations for the implementation of unhindered voting for persons with physical and sensory disabilities. The Ministry of Public Administration and Local Self-Government enabled both blind and visually impaired people to check the data in the Unified Voters' Register on the website.
PUBLISH INFORMATION RELATED TO THE UPDATING THE VOTERS REGISTER ON THE WEB-SITE OF THE MINISTRY OF PUBLIC ADMINISTRATION AND LOCAL SELF-GOVERNMENT	
#53	It is necessary that the Ministry of Public Administration and Local Self-Government prepares a new page on its web-site in order to publish important information related to the process of maintaining and updating the Voters' Register. It is necessary that the Ministry of Public Administration and Local Self-Government publishes on its web-site information related to the process of entering changes, maintaining and updating the voters register, to the competences of those in charge of the voters register and citizens' rights in terms of reporting the change of data in the voters register, as well as the contact details of the person responsible for the Voters' Register in the Ministry of Public Administration and the Local Self-Government.
fulfilled	The Ministry of Public Administration and the Local Self-Government improved the web-site dedicated to the Voters' Register so that it now contains all information important to the citizens.
FORBID ULTERIOR MODIFICATIONS OF THE MINUTES ON THE WORK OF THE POLLING STATION COMMITTEES	
#54	The implementation of this measure requires an amendment to the Rulebook on the Work of Polling Station Committees, which is to be adopted by the electoral commission (Republic or local electoral commissions) right after the calling of the elections. The following should be stated in the Instructions on the work of polling station committees: "Ulterior modifications of the Minutes on the work of polling station committees by the polling station committees' members are not allowed."

fulfilled	An explicit ban on subsequent changes to the Minutes of the Work of Polling Stations by the Polling Station Committees' members was not introduced, but the manner of checking the logical and computational correctness of the entered data was specified immediately upon handing over the election material from the polling station to the working body. If during the statistical processing, logical and computational irregularities are determined, the members of the Polling Station Committee shall be obliged to gather again at the invitation of the working body of the REC, inspect the voting material and verify the changes with their signatures. As subsequent amendments to the Minutes have not been regulated in any way so far, it can be considered that the recommendation has been adopted.
EDUCATIONAL CAMPAIGN FOR CITIZENS ABOUT ELECTION RULES AND PROCEDURES	
#60	It is necessary that all relevant institutions that organise and conduct the elections in Serbia launch a comprehensive campaign to inform citizens about the most important election rules and procedures that ensure the legality and integrity of the process, as well as voter rights and ways to protect voters' rights. Radio Television of Serbia, as a public broadcaster, should be included in the educational campaign.
partially fulfilled	The REC published 16 different guides for voters and members of election administration bodies before the start of the election campaign, while informative videos about voters' rights on the Election Day were shown on public TV stations. The recommendation is considered partially fulfilled because other institutions that have election-related powers (the REM, the Agency) have not conducted education campaigns for voters.
OPEN A PUBLIC HEARING IN THE PREPARATION OF A NEW RULEBOOK ON THE OBLIGATIONS OF MEDIA SERVICE PROVIDERS DURING THE ELECTION CAMPAIGN	
#61	It is necessary that the Rulebook on the obligations of media service providers during the election campaign, which was repealed on February 27 th , 2019, be replaced by the adoption of a new one. The procedure for the adoption of the new Rulebook must commence as soon as possible and on the occasion of its adoption a public hearing must be held in accordance with article 40 of the Law on Electronic Media.
partially fulfilled	The REM has adopted a Rulebook regulating the obligations of public media services, while it has issued non-binding recommendations for commercial media. The Ministry of Culture and Information, which is responsible for giving opinions on the constitutionality and legality of the REM's general acts, pointed out that such an approach has no basis in law, stating that "obligations of media service providers, in terms of the provisions of the Law on Electronic media must apply to both public service media and all other media service providers. "
ANNOUNCE A PUBLIC CALL FOR PROPOSING CANDIDATES FOR VACANCIES IN THE COUNCIL AND INITIATE THE PROCEDURE FOR REVIEWING RESPONSIBILITIES IN THE WORK OF THE REM COUNCIL MEMBERS	
#62	Since 2017, the REM Council has functioned with 6 out of 9 members. In order for the REM to finally work in its full composition, it is necessary for the National Assembly to announce a public call for nominating candidates for members of the Council whose authorised nominators are: the Culture and Information Committee; associations of film, stage and drama artists and associations of composers in the Republic of Serbia and national councils of national minorities. It is necessary to enable the proposal procedure to be transparent and to enable all relevant actors to participate in the proposal, where the Law provides for proposal by mutual agreement. The current number of members of the REM Council allows the members of the Council to be de facto immovable even in cases when they act obviously unscrupulously. As a matter of fact, the procedure of dismissal before the National Assembly initiated by MPs cannot be initiated unless the Council, by a majority of 5 members, has previously made a decision on initiating a procedure in which the relevant circumstances for initiating the procedure of dismissal are determined. In the current situation, this practically implies unanimity: all members except the one against whom the procedure is initiated should vote "in favour" in order for the procedure to be initiated.

partially fulfilled

The vacancy in the REM Council was filled on December 27th, 2019, when three new members were elected. In January 2019, two members elected in 2016 resigned, and they were replaced in February 2020. In the meantime, the mandate of one member, who had been elected in 2015 on the proposal of the Culture and Information Committee, expired on July 24th, 2020. The election of a new member has not been done so the REM is yet again functioning in an incomplete composition. On the other hand, no interventions have been made in the legislative framework that would result in the establishment of clear mechanisms for examining the responsibilities of the REM Council members.

10.3. New recommendations

Once the observation of the 2020 elections was over, the CRTA observation mission formulated 18 new recommendations for the improvement of the election process so that in addition to 62 (unfulfilled, partially fulfilled and fulfilled) recommendations prepared during previous election cycles we are now putting forward a set of 80 recommendations. The goal of these recommendations is to amplify the previous recommendations, but also to respond to the new challenges that our mission has identified in this election process.

These new recommendations address all stages of the election process: pre-election period, the Election Day, and post-election processes. Their outcome should be to increase the capacity and efficiency of the election administration, ensure and restore process transparency and voters' confidence, improve legal certainty and protection of the voters' right, ensure equality of participants and equal media representation, prevent misuse of public resources. A complete overview of both previous and new recommendations is also available on the CRTA web-site.

#63 INTRODUCE A LEGAL OBLIGATION TO ISSUE LICENSES TO MEMBERS OF PERMANENT COMPOSITIONS OF POLLING STATION COMMITTEES

In order to achieve the necessary level of competence of members of polling station committees, it is necessary to amend the relevant provisions of the Law on Election of members of the Parliament and the Law on Local Elections and condition membership in the polling station committee with an appropriate license issued by the Republic Electoral Commission.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly, Republic Electoral Commission. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#64 ANNOUNCE THE COMPOSITION OF POLLING STATION COMMITTEES IMMEDIATELY AFTER THE FORMATION OF A PERMANENT COMPOSITION, WITH INFORMATION ON TRAINING AND LICENSING

It is necessary to amend the Law on Election of members of the Parliament and the Law on Local Elections and oblige the electoral commissions to publish the Decision on the appointment of a permanent polling station committee on its website immediately after its adoption. The Decision should contain the names of members of all permanent polling station committee members and other information relevant for their appointment, including information on the acquired license to perform the duties of a member of the polling station committee. Since an objection to the improper composition of the polling station committee can be submitted to the electoral commission only within 24 hours from the time of the Decision on the appointment of the members of the polling station committee, the adoption of this recommendation would enable efficient use of this legal remedy.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#65 ENABLE FILING OF COMPLAINTS AFTER THE INSIGHT TO THE ELECTION MATERIAL

The current regulations stipulate that the representatives of the submitters of electoral lists and candidates may inspect the election material within five days from the Election Day, while the complaint to the electoral commission may be submitted within 24 hours from the hour when the decision was made, i.e. the action that the complainant considers incorrect occurred, i.e. from the hour when the omission was made. In order for the list submitters and candidates, who noticed irregularities in the conduct of the elections, to inspect the election material, and timely submit a complaint to the electoral commission regarding the observed irregularities, it is necessary to amend the Law on Election of Members of the Parliament and the Law on Local Elections in order to enable them to inspect the election material and to file an objection to the electoral commission within 24 hours from the hour when they inspected the election material.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#66 UNIFY ELECTION RULES ON HOLDING ELECTIONS ON NON-WORKING DAYS

In order to establish the obligation to hold parliamentary and local elections on non-working days (Saturdays and Sundays), it is necessary to amend the Law on the Election of members of the Parliament and the Law on Local Elections. This obligation in the current legal framework exists only in the provision of article 5, paragraph 2 of the Law on the Election of the President of the Republic.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#67 PUBLISH MINUTES ON THE WORK OF POLLING STATION COMMITTEES IN A TIMELY MANNER

The Instructions for Conducting the Elections for MPs in the 2020 elections stipulate that the Minutes of the Work of the Polling Station Committees are taken over by the REC working body directly from the committees, which then scans and submits them to the REC, which publishes all Minutes on its website. However, in practice, during the elections, these minutes were being published for three or more days, i.e. after the deadlines foreseen for filing complaints to the elections actions or irregularities that may be the basis for repeated elections. Considering that in the case of irregular minutes or minutes containing serious errors that may be the basis for repeated elections and motivate the submission of complaints regarding the identified shortcomings, the REC should have a deadline for publishing of all minutes in a timely manner, as soon as possible, that is, immediately upon receipt of the Minutes scanned by the working body. Given that this action is prescribed by the Instructions for Conducting the Elections, which are subject to changes for each election cycle, it is recommended to amend articles 76 or 77 of the Law on Election of members of the Parliament which would determine the obligation of the REC to publish scanned Minutes on its website immediately upon receipt, for each polling station, and no later than within 12 hours from the closing of the polling stations. Published Minutes should have metadata, or otherwise allow the search of Minutes by polling station. The same provision should be implemented in the Law on Local Elections, which would apply to municipal/city electoral commissions.

Competent authorities: Ministry of Justice, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#68 HARMONISE ELECTION DEADLINES WITH DEADLINES FOR PROTECTION OF ELECTORAL RIGHT

Electoral laws should be amended in order to harmonise the deadlines for the protection of the right to vote with the deadlines for announcing the election results. Electoral commissions should determine the final results of the elections after the deadline for submitting objections and complaints, i.e. upon irrevocability or enforceability of decisions made on objections and complaints.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament, the Law on Local Elections and the Law on the Election of the President of the Republic.*

#69 ESTABLISH DEADLINES FOR SUBMITTING A RESPONSE TO VOTERS' REQUEST ABOUT THE USE OF PERSONAL DATA

The implementation of this recommendation requires that the Instruction for Conducting the next elections be supplemented with a provision that would define deadlines for submitting responses to voters' requests about the use of personal data.

Competent authority: Republic Electoral Commission. *The implementation of this recommendation implies amendments to the Instructions for Conducting the Elections for members of the Parliament of the National Assembly that the REC will adopt before the next parliamentary elections.*

#70 IMPROVE THE REGULATORY FRAMEWORK IN ORDER TO PREVENT DISCRIMINATION AGAINST CAMPAIGN PARTICIPANTS

It is necessary that the REM fulfils its legal obligation to regulate the obligations of all media service providers by a binding by-law, including those related to the representation of election participants without discrimination, and to adopt a new Rulebook on obligations of media service providers during the election campaign covering both public service media and commercial media service providers. It is crucial that the REM clarifies the notion of "representation without discrimination" in the new by-law, which would refer to the entire programme, and not only to parts marked as election programme, and that it adopts clear rules on media coverage of regular activities of public authorities in informative and other types of programmes, in order to prevent creating of a privileged position for the ruling parties and their electoral lists and candidates while reporting on their regular activities.

Competent authority: Regulatory Authority of Electronic media. *The implementation of this recommendation implies the adoption of a new by-law by the Regulatory Authority of Electronic media.*

#71 IMPROVE THE MECHANISM FOR REVIEWING THE RESPONSIBILITIES OF MEMBERS OF THE REGULATORY AUTHORITY OF ELECTRONIC MEDIA

In order to determine the responsibility of the REM Council members in a timely and efficient manner, it is necessary to amend the Law on Electronic Media in order to redefine the grounds for dismissal of REM Council members, to precisely determine the body responsible for conducting the dismissal procedure preceding the decision-making at a plenary session of the National Assembly and to clearly define deadlines for the implementation of all phases in the procedure of dismissal of members of the REM Council.

Competent authorities: Ministry of Culture and Information, National Assembly. *The implementation of this recommendation implies amendments to the Law on Electronic Media.*

#72 DEFINE THE STATUS OF PUBLIC SECTOR EMPLOYEES WHO ARE NOT PUBLIC OFFICIALS NOR CIVIL SERVANTS

The implementation of this recommendation requires the amendment of article 23, paragraph 2 of the Law on Financing Political Activities, in such a way that the prohibition of misuse of public resources by political entities would be extended to funds available to employees of public services established by the Republic of Serbia, an autonomous province, municipality, city or city municipality (for example: doctors), as well as to employees in public companies and companies established to perform activities in areas where public services are established (for example: employees in the Public Company *Electric Power Industry of Serbia*).

Competent authorities: Ministry of Finance, National Assembly. *It is necessary to adopt amendments to the Law on Financing Political Activities.*

#73 PUBLISH ALL DECISIONS OF THE ANTI-CORRUPTION AGENCY ON THE WEB-SITE

In order to achieve better transparency in the work of the Anti-Corruption Agency, it is necessary to publish all decisions on the Agency's website. In that sense, it is necessary to amend the Law on Prevention of Corruption by introducing the obligation for the Agency to publish its decisions on the web-site within 24 hours during the election campaign when deciding on an objection related to the implementation of that Law in the election campaign. An identical obligation is already prescribed by the relevant provisions of the Law on Financing Political Activities.

Competent authorities: Ministry of Justice, National Assembly. *The implementation of this recommendation implies amendments to the Law on Prevention of Corruption.*

#74 VERIFY THE VOTERS' REGISTER

It is necessary that the Ministry of Public Administration and Local Self-Government, in a procedure that would include representatives of relevant institutions, political parties, civil society organisations, academic and international community after assessing the impact of data processing within the Voters' Register verification process on personal data protection, verify the Voters' Register on an appropriate sample in accordance with international standards and recognised methodologies. The aim of the verification would be to determine, in the field control procedure on the appropriate sample, the percentage of voters who are registered in the Voters' Register but who emigrated from Serbia or who for another reason do not actually reside at the address entered in the Voters' Register, as well as the percentage of deceased persons still registered and also the percentage of people who have the right to vote but who are not registered in the Voters' Register. In addition, in the verification process, it is necessary that the Ministry of Public Administration and Local Self-Government engage a thorough statistical analysis by hiring IT experts, who would determine irregularities and illogicalities in the Unified Voters' Register system itself (double entries, incorrect personal numbers, etc.).

Competent authority: Ministry of Public Administration and Local Self-Government. *The implementation of this recommendation implies the engagement of the Ministry of Public Administration and Local Self-Government, independent experts and relevant institutions.*

#75 IDENTIFY PRACTICAL PROBLEMS IN THE VOTERS' REGISTER UPDATING

It is necessary that the Ministry of Public Administration and Local Self-Government directly and intensively communicate with persons who update the Unified Voters' Register in local self-government units in order to recognise the problems that these persons face in practice and to conduct effective training based on precisely identified problems that will lead to uniformity of their actions.

Competent authority: Ministry of Public Administration and Local Self-Government. *The implementation of this recommendation implies the improvement of practices of the Ministry of Public Administration and Local Self-Government.*

#76 SUSPEND DELETION OF VOTERS FROM THE VOTERS' REGISTER WITH PASSIVATED PLACE OF RESIDENCE

In the current laws in Serbia, passivation of the address of residence does not represent a legal basis for cancellation of residence, but uniquely the record data of the competent authority that the citizen does not live at the address of registered residence. Consequently, a citizen is obliged to register their residence or, in case they fail to do so, the competent authority (Ministry of the Interior) shall be obligated to determine the address of residence. Bearing all this in mind, there are no legal grounds for deletion of voters whose address of residence is passivated from the Voters' Register. Since in the previous period, the Ministry of the Interior submitted reports to the Ministry of Public Administration and Local Self-Government on the basis of which voters whose address of residence was passivated were deleted from the Unified Voters' Register, it is necessary that this practice, since there are no solid grounds in the law, be stopped. Citizens whose addresses have been passivated should, from the standpoint of the voter's right, remain registered in the Voters' Register with the last known address of residence, until the moment of change of residence or allocation of residence by the competent authority. In the event that the Ministry of the Interior determines the residence of citizens whose residence is passivated, such a change would entail a change of residence in the Voters' Register, which means that the citizen could exercise their right to vote at another polling station (to which the new residence address belongs).

Competent authority: Ministry of the Interior. *The implementation of this recommendation implies changes in practice of the Ministry of the Interior.*

#77 PUBLISH THE NUMBER OF VOTERS IN THE VOTERS' REGISTER BY POLLING STATIONS IMMEDIATELY AFTER THE DETERMINATION OF POLLING STATIONS

In order to improve the transparency of the election process and prevent possible abuses, it is necessary to amend the relevant provisions of the Law on the Unified Voters' Register, so that in addition to the obligation of the Republic Electoral Commission to announce the total number of voters in the Republic of Serbia, there would be an obligation to publish a preliminary number of voters in the Voters' Register not only collectively, but also according to polling stations, immediately after polling stations have been determined.

Competent authorities: Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Unified Voters' Register.*

#78 RETURN COLLECTION OF VOTERS' SUPPORTING SIGNATURES TO THE JURISDICTION OF NOTARIES AND COURTS

In order to prevent possible abuses during the verification of voters' signatures by local self-government bodies, it is necessary to amend the relevant provisions of the Law on the Election of Members of the Parliament and the Law on Local Elections, which prescribe the verification of signatures supporting the electoral list by harmonising these provision with regulations governing the work of notaries. This would mean that a voter can support by their signature only one list and that their signature must be verified by a notary. In cities and municipalities where there are no notaries appointed, signatures can be verified in a first instance court, court unit or reception office of the first instance court. The possibility of verification of signatures in the municipal or city administration should be excluded from the Law on the Election of Members of the Parliament.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#79 DETERMINE DEADLINES FOR ANNOUNCING THE PROVISIONAL ELECTION RESULTS, NO LATER THAN 24 HOURS FROM CLOSING OF POLLING STATIONS

In order to achieve greater transparency of the election process, it is necessary to amend the Law on the Election of members of the Parliament and oblige the REC to publish the provisional election results on its web-site within 24 hours from closing of polling stations.

Competent authorities: Ministry of Justice, Ministry of Public Administration and Local Self-Government, National Assembly. *The implementation of this recommendation implies amendments to the Law on the Election of members of the Parliament and the Law on Local Elections.*

#80 IMPROVE THE REC ONLINE SESSION

In order to ensure publicity and discussion of members at electronic sessions of the REC, as well as efficient decision-making, it is necessary to amend the REC Rules of Procedure in order to introduce the use of some of the available video communication platforms (such as "Zoom"). In this way, a more efficient discussion among the REC members would be enabled, and the publicity guaranteed, through the presence of accredited observers.

Competent authorities: Republic Electoral Commission. *The implementation of this recommendation implies modifications of the REC Rules of Procedure.*