

# ACCOUNTABILITY LIMITED: NGOs in Bosnia and Herzegovina

by

Radka Pudilová

Submitted to

Central European University

School of Public Policy

In partial fulfillment of the requirements for the degree of

Master of Public Administration

Supervisor: Thomas Carothers

Budapest, Hungary

2015

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Budapest, 15 June 2015

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# Acknowledgements

I would like to thank my supervisor Thomas Carothers for being a source of inspiration for writing this thesis. I am forever grateful for the support of my family and friends. Special thanks go to Jindra, who was my pillar of support all throughout my studies.

# Abstract

The thesis examines whether and how the non-governmental organizations in Bosnia and Herzegovina seek to make themselves accountable to local beneficiaries through the use of online methods. The rising role of non-governmental organizations in global governance has led to an increase in demands for their accountability. The lack of accountability assertions are often made by people who are adversary to the civil society sector, as can be witnessed by some of the rhetoric in the current “closing space” phenomenon. Majority of the recent literature acknowledges that the way that organizations engage with the issue is by prioritizing accountability towards donors rather than beneficiaries. Such tendency indicates strong upwards accountability at the expense of mission- and downwards accountability. This thesis looks at how new technologies can potentially challenge the existing paradigm. The status quo indicates that the use of technologies by NGOs in the country remains limited and that there are very few innovative efforts that go beyond the classic website and social media presence. However, the increase in accountability initiatives targeting governments and other bodies offers quite a varied toolbox to be used by the NGOs.

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# Chapter 1

## Introduction

Couple of years ago the civil society sector started to experience a phenomenon labeled by Thomas Carothers as “closing space” (2014c). Possibly the most emblematic example of this trend is Russia, where organizations receiving foreign funding are labeled as foreign agents and regarded as unpatriotic or at worst enemies of the state. The world has witnessed a rise in copycat laws and Bosnia and Herzegovina (BiH) is not an exception. According to the reports by Transparency International, the government of Republika Srpska is currently discussing behind closed curtains a law that targets organizations receiving foreign funding (“Udar Na Rad Nevladinih Organizacija” 2015). This is yet another state attempt where the widely acknowledged and accepted call for transparency and accountability is being politicized. In order to counteract it, the sector should already have accountability measures at place, preferably via some kind of self-regulation initiative. The use of new technologies,



including online accountability, could prove a powerful tool in limiting the governmental efforts in greater control of the sector.

This thesis looks at the state of online accountability measures in Bosnia and Herzegovina. While accountability is primarily exhibited in more direct personal engagements, its online dimension can prove significant in reaching more stakeholders in case of political involvement with NGO's work. Additionally, we can see the rising role of ICTs in relation to good governance globally. There are initiatives such as Ushahidi<sup>1</sup> or MapAfrica<sup>2</sup> that use mapping technologies when working with available data. Similar tendencies can also be witnessed in the Balkans – whether in the form of Open Data Kosovo Initiative or Point Conference on Political Accountability<sup>3</sup>. However, it seems that accountability through online means for NGOs is not widely represented in the research as of now.

The state- and peace-building activities in Bosnia and Herzegovina started in the mid-1990s, at the point when donors engaged more heavily with the civil society sector based on the other transition experiences from democracy's third wave. It is also around that time the concept of accountability starts to be discussed by practitioners and academics examine its application by civil society organizations. However, the designs and management structures of the NGOs in BiH, which have from the beginning suffered from lack of participation and involvement of the local communities, seem not to reflect these discussions. The great influx of money and

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<sup>1</sup><http://www.ushahidi.com/>

<sup>2</sup><http://mapafrica.afdb.org/>

<sup>3</sup><http://point.zastone.ba/en/>

donor-driven project agenda certainly played a role in establishing negative stereotypes about the civil society sector and the NGO workers in the country. The fact that donor organizations all around the world directed their (financial) assistance mainly towards civil society's organized forms and assisted in creation of numerous professional NGOs led to a rise of criticism towards this sector, the most potent one concentrating on the question of accountability (Najam 1996, 340).

Now, almost twenty years after signing of the Dayton Peace Agreement, it is time to re-evaluate the developments. Besides the potential attack on civil society from the Republika Srpska government, the civil society organizations also face diminishing source of funding and general disillusion with the progress in the country. The political sphere remains very much locked in the nationalist rhetoric, chronic economic deficiencies resulted in several protests last year, and even though there has been some progress in the negotiations regarding EU membership, BiH is lagging behind its regional neighbors.

Limited accountability towards beneficiaries is a dangerous trend directly related to the sustainability of the CSOs in the country. It has been argued that a higher degree of accountability can be a key to additional funding. Given that the international donor scene suffers from the "Western Balkans fatigue" and moves on to new endeavors, the sector will eventually have to reorient itself to local sources of funding, which will be especially challenging given the economic situation in Bosnia and Herzegovina.

The heightened need for accountability in post-conflict countries such as Bosnia and Herzegovina also lies in the expected role of civil society organization in de-

mocratization. Historically, OSCE was supporting NGOs in BiH so that they could counter the existing (nationalist) political parties. While disappointment on the part of international actors regarding the role of nationalist parties came very early on with the first national and municipal elections (1996 and 1997), the enthusiasm for supporting civil society did not wither. The past two decades have shown that elites emerging from NGOs are still not capable to challenge the well-established nationalist parties such as SDA (Party of Democratic Action, Bosniak), SNSD (Alliance of Independent Social Democrats, Serb), and HDZBiH (Croatian Democratic Union of Bosnia and Herzegovina). Foster, as cited in Scholte, argues that “if civil society organizations are going to deal with democracy issues, then they also have to have a self-critical reflection on how they work themselves” (2004, 230). This reflection should in essence be based on accountability as it encompasses organization’s transparency as well as legitimacy components.

In the general accountability literature, there seems to be a consensus that the current mechanism of fund provisions towards CSOs actually hampers accountability towards their beneficiaries due to extensive resource (both financial and personal) dedication to compliance with donor requirements. This is illustrated by Najam’s finding that “downstream danger of being over-accountable to patrons, and especially to outside (foreign) patrons, is that of dwindling local legitimacy” (1996, 344). In Najam’s view, the beneficiaries are left out both in terms of functional and strategic (planning) accountability. In my opinion, new technologies can challenge that paradigm as they can provide the organizational data to multiple stakeholders without necessarily putting further burden on the staff.

My research question is: Whether and how the non-governmental organizations in Bosnia and Herzegovina seek to make themselves accountable to local beneficiaries through the use of online methods. During the research I also identified the trend of increased use in open data in NGO's advocacy strategies as well as project implementation. I believe that interesting lessons from these projects can be learned and applied in the accountability domain. This thesis argues that despite the new possibilities, the accountability towards beneficiaries online remains limited and mainly confined to the transparency domain.

While a lot has been written about the best practices of being accountable to beneficiaries and other stakeholders, the domain of how to do it through the use of new media remains underdeveloped. There are initiatives, especially in the humanitarian sector, that are employing new technologies in their work but a comprehensive mapping of these that would provide a learning opportunity for the rest of the sector is missing. This thesis by pointing at the deficiencies on the local level in BiH then calls for more exploration of the means of online accountability in the increasingly digitalized world.

The first part of the thesis provides an insight into definitions and the literature on accountability. In the following part I will establish a context in which NGOs operate as well as present some of the existing open data initiatives from the region. In the methodology part I introduce the register of BiH NGOs that I created as well as a list of indicators that I used for assessing the NGOs' online accountability towards beneficiaries. Lastly, I will indicate some of the implications of my findings about the limited NGO online presence as well as recommendations for betterment

of this situation and some limitations of this thesis.

## 1.1 Definitions

Although this is not a place for lengthy discussions on the meaning of civil society, it is important to establish definitions used for this thesis. One of the most important distinctions lies in separating professionalized non-governmental organizations from other civil society groups. Scholte defines civil society organizations as “groups bring[ing] citizens together non-coercively in deliberate attempts to mould the formal laws and informal norms that regulate social interaction” (2014, 214). The non-governmental organizations are part of this subset, they provide services (sometimes in lieu of the government) but can also engage in advocacy.

Beneficiaries, or clientèle of the NGOs can be defined as “the people that [NGOs] programmes are designed to ‘benefit’” (Najam 1996, 345). This subset can then further be defined to direct and indirect beneficiaries, which can both theoretically claim entitlement to accountability, even though that would almost never be granted to ‘outsiders’. This division also illustrates the problem of NGOs’ multiple stakeholders.

The definition of accountability for the purpose of this thesis is that of relational practices towards multiple stakeholders (i.e. donors, beneficiaries, own members). It thus stresses the multidimensional characteristics of accountability, while highlighting that it is a continuous process rather than a static state of affairs. It is also based on one of the very few common points related to defining the concept – that of “the process of being called ‘to account’ to some authority for one’s actions” (Mulgan 2000,

555). Such accountability can be upward (towards donors/governments), horizontal (towards other NGOs), downward (towards beneficiaries), and inward (towards organization's members).

Democratic accountability, a somewhat of a holy grail of accountabilities, is defined by Borowiak as following:

First is the notion of **sovereign demos**: democratic accountability is interpreted as an expression of the ultimate authority of a bounded political community of citizens. It is thereby seen as a realization of the republican principle of self-governance. Second is the belief that democratic accountability's **primary function is to exercise control**: democratic accountability is construed as a way for a sovereign demos to exert discipline and control over governing bodies. Third is the presumption that democratic accountability operates through formal institutions of government: realizing democratic accountability is thought to depend upon the **design of formal accountability mechanisms**.

(2011, 4; emphasis by me)

While this definition is very much construed for holding government accountable, I believe that it could be extended to cover governance and thus NGOs as well. I have deliberately chosen democratic accountability as an ideal to strive for, as it is thought to “generate political community and to disrupt institutional hierarchies” (Borowiak 2011, 4), which seems to be rather desirable in post-conflict state-building processes. While the ideal democratic accountability may never be reached, striving for it may bring about significant societal changes and learning – similar to general striving for democracy.

# Chapter 2

## Literature Review

In this section I am going to address the theoretical discussions about NGO accountability that were essentially started in 1990s by Edwards and Hulme. This section looks at some of the definitions for this nebulous term in literature but also in its practical implementation. It also briefly touches upon the discussions of new technologies and their role in accountability. Understanding the complexity of accountability informs my choice of criteria for the “Bare Minimum” questionnaire used for NGO assessment in this thesis as well as allows for appreciation of the role of technology in aspiring to cater to multiple stakeholder accountability.

Accountability is seen as a part of a more complex package together with transparency and legitimacy as these are rather intertwined. It is essentially tied to the concept of good governance and is defined in a myriad of ways – from principal-agent relations to accountability to one’s mission. Around 2005 we can see the rise in ques-

tions about the downward accountability, especially with regards to the provision of humanitarian help.

A lot of the accountability talks also happens in the development circles. This is mainly due to the fact that the previously unquestioned flow of aid from North to the South started to be regarded as problematic and the foreign-funded programs were labeled as donor-driven and not responding to local needs. Participation of multiple stakeholders then started to be heralded by major aid organizations such as USAID or Swedish SIDA.

NGOs are usually accountable to multitude of actors such as governments and donors (upwards accountability), beneficiaries (downwards accountability), staff (internal accountability) and the wider sector (peer or horizontal accountability) (Crack 2014). These dimensions come to play when we talk about transparency as they essentially point towards the puzzle of who gets to ask the questions. Given that most of the donors have quite strict requirements for reporting on use of their funds, CSOs are doing reasonably well in the domain of ‘upwards accountability’ - yet, the other areas remain largely untouched.

## 2.1 NGO Accountability

### 2.1.1 Evolution of the Concept

The issue of NGO accountability started to gain prominence already in 1980s when NGOs started playing a greater role in the development domain. The theme arises periodically in academic circles, yet, it was not until late 1990s that some of the



research translated into practice in the form of Philippine Council for NGO certification – one of the model regulation initiatives up until today. In the aftermath of the 2004 tsunami and the backlash related to the conduct of humanitarian organizations in their relief operations, a sector-wide standards, such as the Humanitarian Accountability Partnership, have been established. In my opinion, the 2010s then mark a new point in the development of our understanding of accountability - the era of accountability through the use of new technologies.

In the early days of accountability discussions, often personified in public administration literature by writings of Friedrich and Finer, accountability itself was seen just as an external part of responsibility (Mulgan 2000, 585). At an international level, accountability is being discussed in connection to concepts such as good governance at the national level and global governance. This phenomenon is linked to the increasing role played by advocacy organizations such as Amnesty International at international forums. Scholte (2004) provides a comprehensive overview of the on-going discussions at this level.

### **2.1.2 Defining the Nebulous Term**

One of the issues that regularly arises is that accountability is such a versatile concept that it is hard to define what it includes. As Borowiak puts it: “the concept is used loosely or in generalized manner that masks just what sort of accountability is being demanded, as if any and all forms of accountability are the same” (2011, x). The bare minimum is that the organizations spend their funds on the activities that were agreed upon (Najam 1996, 342).

Borowiak has argued for a broader understanding of the term: “the right actors need to be accountable to the right people for the right reasons and in the right way” (Borowiak 2011, 9). Such a functional definition of accountability calls our attention to the design of the accountability mechanism, identification of stakeholders and clarification of the mutual relations. NGOs are usually accountable to multitude of actors such as governments and donors (upwards accountability), beneficiaries (downwards accountability), staff (internal accountability) and the wider sector (peer or horizontal accountability) (Crack 2014).

Accountability is quite often defined in terms of principal-agent relations. However, such relation implies a certain power hierarchy, which is more often than not absent in NGO-beneficiaries relations. For the principal-agent paradigm to work, the agent must be answerable to the principal, who has the power to revoke the agency from the agent. The model is, however, rather faulty when addressing relations between communities and civil society as it acknowledges only institutionalized relations and neglects those external to the established framework (Borowiak 2011, 54). As Najam suggests, the most functional paradigm would be that where both parties are patrons and clients at the same time (1996, 347).

### **2.1.3 Forms/Means of Accountability**

There has been a rise in accountability and self-regulation initiatives worldwide and many of them have been mapped by the One World Trust. However, people are still unsure what accountability actually means and towards whom should NGOs be accountable and to what extent. Transparency towards donors has been established

as a critical element and national governments also call for greater disclosure of NGOs' activities.

While for some accountability is equal to transparent budgeting and fundraising, others would argue that it should also include planning and evaluation with participation of the beneficiaries. As Najam suggests, fiscal accountability is often seen as a way of achieving policy accountability, which is much harder to establish and maintain (1996, 342).

For Hammer, accountability of NGOs comprises of the following elements:

**transparency** of the evidence basis used in advocacy, of funding and funders for specific campaigns and activities, and around forward looking information such as strategy, and the processes used to determine advocacy priorities; opportunities for **participation** of beneficiaries and other key stakeholders of the organisation in the development of advocacy objectives and their review; and the development of criteria for **evaluating the impact** of advocacy with beneficiaries and other stakeholders, and the establishment of **feedback** and complaints handling mechanisms to address individual experiences and problematic impacts.

(2010, 1; my emphasis)

**Transparency** can be perceived on several levels and thus various researchers take into account different benchmarks. For example, in the article by Rodríguez et al. (2012a) we can see how for some the simple act of publishing organization's profile (including its mission, contact information and number of employees and volunteers) would suffice while others would call for public openness about functioning and structure of the governing organ. The trend these days seem to be that the public demands greater transparency about governance practices of NGOs, rather than just their results (Rodríguez 2012b). However, while transparency is generally

seen positively, we also need to bear in mind that especially in the fields related to human rights too much transparency may put at risk not only the researchers and activists but also their sources (Hammer 2010).

Evidence suggests that transparency is mostly understood in terms of finances. Furthermore, as Hammer (2010) points out, no self-regulation initiative is explicitly aimed at transparency of the evidence basis and methodology it uses. This seems to be a general concern as Hammad and Morton (2011) contemplate the lack of transparency in relation to programs and projects. Demand for transparency may also differ according to an organization's status and field of intervention. Crack (2014) cautions that NGOs also differ in their governing structures and as such one model of transparency does not fit all – and good self-regulatory initiatives should reflect that.

Particular emphasis on transparency is crucial given that a majority of NGOs would claim that they are indeed transparent – however these claims often do not conform to reality (Burger, Owens 2010). A lack of transparency is often manifested in inaccurate information or a simple unwillingness to provide information. According to existing research, several factors are significant in relation to already existing transparency policies: organizational size, public funding, and organizational age (Rodríguez 2012b). Usually, the bigger the companies the more information they disclose and they tend to be more transparent if they receive governmental funding. Whether these findings hold true for BiH could be another point for research.

**Participation** is often the Achilles heel of accountability. As Najam claims, it is largely undefined and thus is often limited to tacit agreement of the beneficiaries

with the NGO's actions (1994, 346). The objectives and process of the projects are often decided, by donors and NGOs alike, long time before the local community is invited to participate.

**Evaluation and feedback** are important as an acknowledgment of human fallibility and a requirement for their possible rectification (Burger, Owens 2010). The simple truth is that compliance with self-regulation requirements may be expensive – organizations need to invest capital to produce their reports or hire individuals for third-party audit. However, non-compliance can get expensive as well – the NGOs in question may lose credibility or suffer penalties for their faulty reports. In reality, however, these depend in the development of compliance mechanisms and both strict and mild approaches to the question could yield positive results.

#### 2.1.4 Self-Regulation

Self-regulation goes hand in hand with accountability as it basically regulates the power relationship between the different actors (if we see accountability as a power relationship) or provides a standard to which the NGO adheres (i.e. in terms of accountability to one's mission). In order for self-regulation to be effective “mechanisms also need to be developed that provide monitoring and, where necessary, enforcement of the standards” (Lloyd 2010, 1). This, however, does not seem to be a common practice as only about half of the self-regulation initiatives mapped by One World Trust includes some sort of compliance system. According to the research by Dale in Lloyd, enforceability of sanctions seems to be a determinant of effective self-regulation initiative (2010).

Lloyd also identifies core factors that have an impact on designing a compliance system: “available resources, the nature of the relationship between civil society and the state, public trust in the sector, and trust and collaboration within the sector” (2010, 14). If there is a competition for funds within the sector, organizations may not be willing to engage in activities such as peer review. It is also generally believed that the weaker the public trust in the sector, the stricter the compliance mechanism must be. However, the implicit threat of sanctions may endanger the culture of openness (Crack 2014). Yet, “the key distinction between strong and weak programs is the use of disclosure or verification mechanisms to enforce compliance” (Gugerty 2009, 243).

The compliance mechanism certainly seems to be at heart of any self-regulation initiative. If the SRI aims at increase in the legitimacy of NGOs, it needs to have a certain level of legitimacy itself, which is usually devised from its compliance mechanism. Yet, as we can see when NGOs fear the sanctions, it may limit their openness and that may lead to falsifications and inaccurate information. Self-regulation and accountability should ideally go hand in hand and one simple reason for that is money. CSOs worldwide could fundraise an additional \$100 billion annually if they improved governance and efficiency and signaled this to donors (Gugerty 2009, 245).

The CSOs essentially need to regulate themselves in order to limit the intrusion from other parts of the society. There are some external factors such as numerous scandals, concerns about funding terrorist organizations, and greater competition for funds which contribute to calls for self-regulation of the civil society (Laybourn 2011). It would be naïve to expect that there will be no regulation from government

whatsoever, but the self-regulation should go beyond that and offer something extra to show CSOs' voluntary approach to such benchmarks. Furthermore, self-regulation is important as it allows for the development of "process-oriented, sector-wide, and beneficiary-focused approaches to strengthen accountability for advocacy organizations" (Hammer 2010, 3).

Many of the self-regulation initiatives emerged in development and humanitarian relief sectors. The two most well-known self-regulation programs, Humanitarian Accountability Partnership (HAP) Standard and Sphere humanitarian charter, further confirm this trend. However, as these are codes of conducts, an enforcement mechanism seems to be rather weak. Nicholas van Praag (2014) argues that the beneficiaries should take an active role in that by "providing feedback on whether beneficiaries consider that programmes are becoming more responsive to their concerns".

### **2.1.5 Limits to Accountability**

NGOs are often considered by general public and politicians as unaccountable to their own societies for various reasons. One of them is the strong drive by some donors to harness NGOs to donor agendas, limiting them in the promotion and implementation of their own goals and strategies (Evans-Kent and Bleiker 2003, 104). This manifests in the frequent, ad hoc re-orientation by NGOs of their agendas to fit to newly issued project calls that reflect the current trends in international aid. Such rapid changes are also often witnessed in post-conflict settings where the donors rush in with one set of priorities on mind but keep the projects duration to 3-6 months to allow for certain flexibility to reflect changing realities. Sometimes the accountability is also

limited by the assessments that donors require. As Brouwer suggests, “at the meso and micro levels, donors prefer to assess impact by measuring output rather than outcome, and go so far as to consider the two synonymous” (2000, 41).

### 2.1.6 New Technologies

Given that we live in the age of digital online information, it is often argued that self-regulation initiatives should use the internet tools (Rodríguez 2012a). Furthermore, as Crack argues “creative thinking is needed about the different ways that accountability can be demonstrated, other than through paper documentation” (2014). Comprehensive mapping of the role of new technologies within accountability domain or indeed establishing some sort of online accountability indicators would definitely help the NGOs to navigate their work better.

The importance of new technologies is inherently tied to the limitations of the existing initiatives. With regards to peer regulation, Crack found out that it has tendency to be excessively bureaucratic and requires a significant amount of labor (2014). Furthermore, it seems that lately there has been an expansion of regulatory activities which may leave the NGOs confused and frustrated. Confused because they may not know which initiative would best serve its interests and frustrated because it is overwhelming to keep up with reporting requirements while continuing one’s mission. This phenomenon is also tied to the fact that the CSOs mostly need to report to donors who have their own designs for evaluating organizational accountability and transparency and thus the data needs to be presented in a certain manner, which may differ from the regulation framework that the organization is



part of. Nevertheless, peer regulation, ideally, has an inherent benefit for further development of given sector. It provides networking opportunities as well as space for sharing best practices (Crack 2014). Additionally, given the rising number of NGOs, their participation in self-regulatory initiatives could help them achieve a competitive “stand out” from the wide pool of operating organizations (Hammad and Morton 2011).

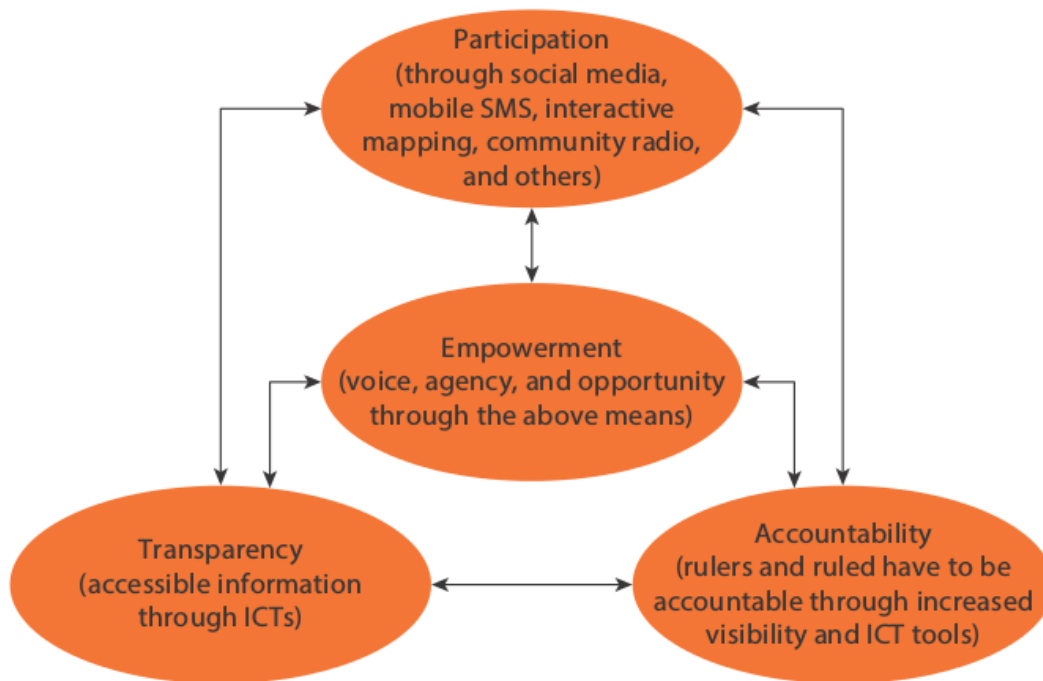


Figure 1: Roles of ICTs (Gigler and Bailur 2014, 8)

Figure 1, taken from Gigler and Bailur (2014, 8), shows the assumption behind the role of ICTs in accountability and other domains. It shows a classical dichotomy between rulers and ruled, even though there are certainly more parties that come to play when it comes to accountability – such as the donors and the governments.

The general debates when it comes to new technologies revolve mainly about the accessibility of these to the beneficiaries (Gigler and Bailur 2014, 9) or the way they are designed and implemented (Avila et al. 2010, 5).

While the ICTs started to gain prominence in research following the wave of optimism after the Arab Spring, it has also been acknowledged that they cannot be the end in itself. If the NGOs are simply not willing to give up some of their power and respond to beneficiaries, then open data or the most fancy mapping systems are not going to change anything.

### **2.1.7 Possible Setbacks and Limitations**

Accountability does not come without complications. From the very early days, caution has been raised in BiH about the excess of NGO accountability towards donors (Najam 1996, 344). The status quo in the country has for a long time been that of “donor dependency”, partially caused by the rush of foreign agencies to Bosnia and Herzegovina after the signing of the Dayton Peace Accords. This is also inevitably a result of problematic balancing between the multiple accountabilities that NGOs have. As Edwards and Hulme in Najam state: “Equal accountability to all at all times is an impossibility” (1996, 350).

Additionally, given the rising suspicion of governments in many countries towards foreign support for domestic civil society groups, excessive transparency about NGO organizational practices and similar could be potentially threatening (Carothers and Brechenmacher 2014a). The danger then lies in the fact that accountability “becomes identified with control itself” as it can be used by the governments to eliminate

organizations considered incompatible with their policies (Mulgan 2000, 563).

When designing the accountability mechanism there is a danger of it becoming yet another mindless box-ticking exercise already similar to the log frames and other tools used by donors nowadays. Such a mechanism would not be helpful to any of the stakeholders and would turn a potentially useful learning exercise into sham. As such, the community should take some lessons from what has worked and what has not in the domain of upward accountability and try to modify it to fit the needs of other stakeholders as well.

Furthermore, one also needs to be careful about who defines accountability, and for what purposes they do so because the “process can itself be value-laden and political” (Najam 1996, 350). Ideally, defining accountability and/or a self-regulation mechanism should be a collaborative effort of all the stakeholders involved. This would mean addressing vertical, horizontal, external and internal accountability and agreeing on how they are to be prioritized. While such an exercise in itself would definitely be of great organizational learning value, its funding seems rather unrealistic given that most of the aid these days is project-related and not supporting the operational costs of NGOs.

Even just with regard to accountability towards donors, there are clear problems with regards to the questions asked. For example, evaluating the impact of a given program is often difficult given that none of them happen in an absolute political and societal vacuum. As Fagan concludes, such measurements “remain replete with difficulties and fraught with contention” (2010, 5). There is thus no reason to be optimistic that the beneficiaries could themselves be more successful and impartial

when evaluating impacts of the programs affecting their communities. The argument often stands that these communities “may have limited knowledge of a donor’s overall interests and priorities” (Green and Kohl, cited in Fagan 2010, 13). This position inevitably creates a dilemma: whose interests and priorities should take primacy for the organizations in question and how that transplants to their accountability mechanisms. If one believes in grassroots organizations bringing about the change then the donor’s interests and preferences should play a minimal role – however, in Bosnia and Herzegovina we can observe two mechanisms as play: the top-down from international community (exemplified by the establishment of the Office of the High Representative) and the emphasis on grassroots initiatives supported by directing significant amount of the foreign aid towards the civil society organizations.

The overview of accountability literature suggests that there are powerful dynamics at play. The NGOs need to realize whom they are (or want to be) accountable and in what area of their work. While new technologies can lighten some of the resource requirements, they cannot be seen as the ultimate solution to accountability problems. An assessment of accessibility as well as usefulness of the technologies at hand will determine their successful use.

# Chapter 3

## Context

Having the theoretical base of NGO accountability covered in the previous section, I am now going to define the practical context of the debate. In the first part of the context section I will present the CSO landscape in Bosnia and Herzegovina, touching upon its formation phase as well as the so far only existing accountability initiative in the country. In the second part, I will present some of the trends in the new technologies and accountability landscape, particularly looking at a regional example of the use of open data – the Open Data Kosovo initiative.

### 3.1 Bosnia and Herzegovina

Bosnia and Herzegovina has received an immense influx of foreign aid after the end of the 1992-1995 civil war. The flow of money to the country was unprecedented in

Europe and in some years it amounted to almost 1500 USD per capita per annum (Pasic). A great portion of this money has gone to the civil society sector which was hoped to provide an alternative to the deeply nationalistic political sphere. The hopes proved to be false as the early election results showed – and the nationalist parties are in fact still in power today.

Despite the extraordinary attention of the international community, the country has not really significantly progressed in the past two decades and according to Freedom House falls into the category of “partly free” states – a status it has kept since 1998 regardless of the score improvement from 5.0 to 3.0 (7 being the worst and 1 the best). The stagnancy of the situation on the ground is staggering and even though several protests have occurred in the past two years, the recent elections confirmed the supremacy of traditional parties relying on support based on their ethnic identities.

In the 1990s the incapability of civil society organizations to empower local communities was framed in the rhetoric of “technical problems which the Bosnian elites [were] seemingly unable to grasp or as deeper problems of Bosnian culture” (Chandler 2004, 228). Nevertheless, there was quite a widespread assumption that the “vibrant sector of civil advocacy networks can entrench democratic values, heal the wounds of ethnic conflict and facilitate economic growth, bringing an end to the international administration of Bosnia” (Fagan 2010, 57). Despite the large numbers of existing civil society organizations (over 1500 according to the register of Ministry of Justice<sup>1</sup>) this “vibrant sector” remains to be more existent on the paper than in day to day

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<sup>1</sup>[http://www.mpr.gov.ba/organizacija\\_nadleznosti/uprava/registracije/udruzenja/RU\\_11\\_11\\_14.pdf](http://www.mpr.gov.ba/organizacija_nadleznosti/uprava/registracije/udruzenja/RU_11_11_14.pdf)

reality.

Participation seems to have been a problem from the very beginnings of the new civil society building efforts, as Sabine Freizer from OSCE acknowledges (Chandler 2004, 234). This may be related to the fact that even though the NGOs were considered grassroots efforts, they overwhelmingly consisted of middle-class urban elites who had troubles connecting to their local audiences. This composition of the nascent civil society is often formed by the requirements issued by the donor community: the project proposals involve specific vocabulary and more often than not need to be written in English rather than the local language. This inevitably excludes certain grassroots organizations which may be better connected to their beneficiaries but lack the donor-preferred skills.

It is argued that accountability “can help constitute and renew political community through public deliberation, the (re)creation of public spaces, and the circulation of political responsibility. [It] can engender democratic capabilities and new forms of solidarity and public consciousness across boundaries of citizenship” (Borowiak 2011, 13-14). Such targets are more than desirable in any post-conflict settings, especially in societies with ethnically divided populations such as BiH. In that sense, accountability can significantly contribute to reaching the target envisaged for CSOs in the country: democratization.

Stoessel (2001, 8) also warns that weak (often post-conflict states) may be environments conducive to the creation of para-governmental organizations. These are then means for “cheap delivery service for donors” (Ibid.). Such concerns are also voiced in the research on the situation in Bosnia and Herzegovina in 1990s where the

“the condescending nature of know-how transfer” was acknowledged (Fagan 2010, 59). Looking at such assessments through the accountability lens, these concerns indicate the primacy of upwards (donor) accountability at the expense of the downwards and internal ones.

The literature on civil society in BiH additionally seems to suggest that unless the NGO sector changes, it “will remain dependent on and wedded to the agendas of the EU, disengaged from grass roots civil society, and existing as adjunct of certain state agencies and ministries, but without being granted full access” (Fagan 2010, 93). We can see some of these concerns materializing in the case study on cooperation between government and civil society in BiH published in Žornaczuk (2014, 43-59).

Although the popular narrative in the country often labels NGO sector as “ubleha” - an untranslatable slightly derogative term playing upon the perceived abundance of talk and lack of action in civil society – the research by TACSO and IPSOS indicates that 50% of population has confidence in NGOs, which is twice as many as those trusting the government (“Civil Society Organizations in Bosnia and Herzegovina” 2014, 15).

In 2004 “Agreement on Cooperation between the Council of Ministers of BH and the Non-Governmental Sector in Bosnia and Herzegovina”<sup>2</sup> was signed, confirming the important role that NGOs play in the country. As part of this agreement effort, the only existing network based code of conduct for NGOs in the country came alive. Despite the fact that the network itself has almost 500 members, only about

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<sup>2</sup>[http://www.civilnodrustvo.ba/files/docs/Agreement\\_on\\_cooperation.pdf](http://www.civilnodrustvo.ba/files/docs/Agreement_on_cooperation.pdf)



fifty organizations from the whole country signed the code (Kodex)<sup>3</sup>. Some of its provisions are the following:

- To the largest extent possible, we will try to engage all citizens coming from adequate local social communities interested as responsible protagonists and partners in designing, realization and evaluation of our projects and programs.
- Our programs will be planned, designed, implemented, monitored and evaluated with due respect of principles of equality and with active role and participation of those concerned
- In our relations with authorities and members of local community, public, our donors and other potential partners, we will be transparent and responsible, and will use every opportunity to inform public about our activities, sources and method of utilization of funds, regularly and as fully as possible
- We will accept only those grants and other types of donations the intention of which is in accordance with our mission, basic goals and capacity of organization, which in no way will put at risk its autonomy and integrity.
- We are ready to share and exchange our knowledge, experience and information with basic goal to promote common learning and better mutual understanding
- We will be ready to publicly announce the results of evaluation of our activities

(“Code of Conduct for Non-Governmental Sector in Bosnia and Herzegovina” 2004, 2-7)

It is certainly puzzling that more organizations have not joined, raising the question of whether the standards were set too high or if there was no benefit perceived in adopting them. While the codex remains vague in concrete implementation measures, it mentions these operating principles: transparency, accountability to one’s

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<sup>3</sup><http://www.oneworldtrust.org/csoproject/images/documents/uploading%20from%20MH/BSNA2.pdf>

mission, and beneficiary participation. Unlike many codes of conduct, it actually has a monitoring mechanism and means for sanctions which should enforce its implementation. As there are no concrete means for achieving the principles defined, it leaves a great space for interpretation by the individual NGOs.

Another organization, NVO Vijece (NGO Council, est. 1996), also has a certain code of conduct<sup>4</sup> for its members. There are around 50 member organizations who agreed to, among others, “promotion of the best practice, transparency and accountability in the NGO sector, together with the main actors in the sector” (“Smjernice Za Rad,” n.d.).

NGOs can lose their membership if they act against the network’s guiding principles such as the one above. These two examples show that accountability is not a new topic in the country and that there have been some attempts to address the concerns. It is noteworthy that from all the self-regulation means (such as certification schemes, awards, etc.), it is the code of conduct that is being employed in the country. Further research would be needed to establish the reasons for the lack of other mechanisms in place.

One of the basis for informing the public about the NGOs working in their vicinity is a comprehensive register of relevant organizations. Given the complicated governmental structures in the country, this relatively simple task is nowadays fragmented across many bureaucratic levels in the main entities as well as kantons in the Federation. There have been numerous attempts to set a comprehensive registry of NGOs in the country. One of the most recent, from 2013, is an NGO registry by

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<sup>4</sup><http://www.nvovijece.ba/images/stories/Downloads/smjernice%20nvo%20vijeca%20final.doc>

the Federation Parliament which was widely supported and advertised – but seems to be more of a failure than a success (“Prijave Za Parlamentarni Registar NVO U FBiH” 2013; “Održana Ceremonija Pokretanja Prijava U Parlamentarni Registar Nevladinih Organizacija” 2013). In fact, only 55 organizations registered there in the two years of its existence<sup>5</sup>. This may be due to the voluntary nature of the register or due to the fact that nothing motivates the NGOs to enter their credentials there. Throughout my research for this thesis I came across almost 20 different lists of NGOs.<sup>6</sup> While they differ in size, geographical concentration and organization, a lot of them seem to be just a one-time effort. Additionally, most of them do not contain organizations’ online contact information – and sometimes even the “classic” means of communications such as a phone number is missing.

A new initiative was launched in 2013 by Centar za Promociju Civilnog Društva (Center for Civil Society Promotion) aiming at sustainability of the civil society. It includes goals related to regulatory frameworks and self-regulation initiatives. This project was awarded a grant of over 8 million USD by USAID, signaling that the topic of greater accountability bears relevance even nowadays. The project is expected to finish in 2018 and will support around 10 NGOs (“Projekat ‘Održivost Civilnog Društva’” 2015). Apart from that, an online register is envisaged to be created by the end of the year where organizations would be able to present their annual reports and which would also serve for greater transparency vis-à-vis the division of donor funds (“Koliko Smo Transparentni?” 2015) Given the failure of most of the previous

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<sup>5</sup><http://www.parlamentfbih.gov.ba/NVO/pretraga.php>, accessed 1 June 2015

<sup>6</sup>[http://ngoaccountability.eu/?page\\_id=32](http://ngoaccountability.eu/?page_id=32), accessed 1 June 2015

registry initiatives to create a sustainable go-to resource, one has to wonder what change is an additional registry going to make for the people on ground – or indeed if they were consulted about it at all, as the report only mentions approval on different political levels.

There seems to be a discrepancy between the talk and the practice when it comes to the CSOs in the country. For example, while they claim to be informing all stakeholders about their work, many CSOs admit that they lag behind in making their financial documents public (“Civil Society Organizations in Bosnia and Herzegovina” 2014, 9). This is not the only worrisome trend that the IPSOS report points at. According to beliefs of CSO representatives, more than two thirds of the existing organizations do not publicize their annual program reports (Ibid., 9). Such a finding is problematic on two fronts: it indicates that there is a lack of horizontal accountability in the sector (using the word “believe” suggests that there is not a solid knowledge on the topic) and secondly, if the content is true it also signals lack of accountability to the beneficiaries.

As of 2013, Civicus put BiH on 58th place in its ranking of enabling environment for CSOs with an index score of slightly below average (“Enabling Environment Index 2013” 2013). However, as mentioned in the introduction, the threat of “closing space” seems to materialize in the country and if the law in the Republika Srpska is passed, it will certainly worsen BiH’s position. Mendelson, in her recent report on governments targeting CSOs, highlights the following five factors as influencing the trend:

- Business model of dependency on foreign funding;
- Degree to which NGOs are viewed as relevant or legitimate by local populations;

- Success of international or transnational efforts at solidarity to keep space open;
- Increased connectivity of citizens in the digital era; and
- Impact of the post-9/11 security and transnational crime frames.

(2015, 3)

If these are indeed also applicable for the decisions of Republika Srpska parliament, then strengthening NGO accountability could help in addressing some of these points. Most notably, greater (online) accountability to beneficiaries could potentially increase the legitimacy of the sector in the eyes of the public.

In this section I illustrated the origins of the current NGO sector in Bosnia and Herzegovina. I have also touched upon the existing self-regulation initiatives which manifest themselves as codes of conduct and illustrated the current initiatives and debates about accountability in the civil society sector in the country. The information from this section informs the possible choice of new technologies for addressing some of the deficiencies.

## 3.2 New Technologies and Accountability

With the rise of new digital technologies as well as the widespread access to internet, many accountability initiatives are exploring the digital sphere. Mapping of all the initiatives would require a thesis in itself and therefore the presentation below remains rather superficial, albeit offering an overview of the domain. I introduce in more detail some of the projects of Open Data Kosovo as I believe that the geographical proximity as well as the fact that both countries are essentially post-war societies

provides space for possible co-operation and sharing of best practices.

The new media and new technologies have brought about a plethora of tools to be used by anybody who is tech savvy. In the past decade, plenty of transparency and accountability initiatives started to use these in order to advance their projects. Most of the existing projects are targeting the political sphere, but there are also some initiatives looking at the donor involvement. However, when it comes to CSOs, there seems to be a lack of such projects, or at least reports about them. Avila et al. provide a first attempt at global mapping of such initiatives and confirm the above finding (2010, 6).

There is plenty of tools that can be mobilized in order to strengthen transparency and accountability. The previously mentioned platform Ushahidi popularized the use of mapping for data visualization. Other organizations do publish otherwise inaccessible data (in accord with the national right to information laws) or present data narratives that are more accessible to the public. Social media such as Facebook and Twitter also play quite an important role, especially when it comes to connecting with one's constituency (Avila et al. 2010, 35).

In the Balkans, Kosovo seems to be leading the digitalization wave. Data platform Open Data Kosovo<sup>7</sup> presents initiatives from the country that are using data in order to enhance good governance and accountability. They have launched several projects dealing mainly with monitoring the political sphere (such as election monitoring or Corruption Index). What is noteworthy is that they do not provide the open data only, but also the source codes for many of their applications, which facilitates their

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<sup>7</sup><http://opendatakosovo.org/>, accessed 31 May 2015

adoption by other organizations if they desire so. Below I present one of their projects in order to illustrate how these can be possibly adapted to the use by CSOs.

In the municipality of Gjakova a small team of volunteers created a map of illegal dumps and cross-referenced it with the garbage truck routes.<sup>8</sup> The significance of making this data accessible is at minimum twofold: other organizations can make use of them and thus save money by omitting duplication of the research, and thanks to their transparency they can also be contested if they are found inaccurate. If NGOs decide for using the mapping software, they can use it as an advocacy tool in their campaign. Similarly, if they map their own work on ground, the beneficiaries can access this information easily and check whether it reflects the reality. If there is a proper empowering mechanism at place, as highlighted in the literature review section, such effort can lead to higher degree of accountability, involving the beneficiaries in the monitoring phase of the project.

In BiH, it is Zasto Ne (Why Not) organization that promotes the use of new technologies with regards to accountability. Their projects, however, mainly concentrate on accountability of the government and free access to information, even though they also promote the use of new technologies in the civic sector (“Programi Zašto Ne” 2015). It seems that they follow the general trend of first bringing the government to account without doing the same for the civil society sector.

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<sup>8</sup><http://opendatakosovo.org/app/illegal-dumps/>, accessed 31 May 2015

### 3.3 Summary

The establishment of the civil society in post-war Bosnia and Herzegovina instilled emphasis on upwards accountability into the system. The trend continues up until today due to the strong position of foreign funds in the country. Nevertheless, there have been some accountability initiatives aiming at challenging the status quo, which remains further complicated by the political division of the state into entities and rather powerful kantons. The lack of downwards accountability can potentially be challenged by introduction of new technologies. These have mushroomed in the past decade worldwide and predominantly target the political sector. This pattern also seems to be repeated in the Balkans, as exemplified by the Open Data Kosovo and Zasto Ne initiatives. Nevertheless, the tools for NGO online accountability can be based on the already existing programs targeting other sectors of society.



# Chapter 4

## Methodology

This thesis builds upon the existing discussions about civil society accountability both in academic as well as practical spheres. This reflects in the methodology employed: in the desk research I combined both an extensive literature review as well as data analysis of NGO online presence. The thesis unfolded in three separate stages. At first, I analyzed the literature dealing with the concept of accountability in order to establish some general convergence on basic accountability indicators. I have also looked into the use of new technologies for greater accountability, which however proved rather challenging, as most of the existing initiatives employed by CSOs monitor others but not the sector itself. Based on the knowledge gained I created an indicator of “Bare Minimum” online accountability standards. Before I could apply it to the sample of organizations, I had to also create a representative BiH country registry, as there is no comprehensive nation-wide list as of now. Through

analyzing the online presence of almost two hundred NGOs, I was able to identify some commonalities in the gaps in online accountability of the organizations at hand.

## 4.1 Literature Review

The process of literature review consisted of two parts. Firstly, I collected relevant literature from the past almost three decades that discusses the problem of accountability and how it is exhibited in the non-governmental setting. I mainly concentrated on the accountability towards beneficiaries, as it is often argues that the new technologies should empower them more. Secondly, I drew upon rich variety of sources for compiling the final list of indicators. I looked into several evaluation frameworks but also considered more general guiding principles present throughout the literature. Many of the existing self-regulation initiatives can be found at One World Trust's website<sup>1</sup>, which also provides numerous reports on the topic. I then tweaked the identified means of accountability to fit the online environment so that the NGO assessment could take place.

## 4.2 Register

As mentioned in the context chapter of this thesis, there have been many attempts at setting a directory or a register of CSOs in BiH. The bureaucratic structure leads to a situation where there is no nation-wide registry but several different ones, reflecting

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<sup>1</sup><http://www.oneworldtrust.org/csoproject/>

on the division of political power within the state. Therefore, Republika Srpska (RS) has a centralized register whereas organizations in the Federation are spread across many documents. The challenge of working with these is that once the organizations register, they can stay on the list forever, even though they are no longer active (Tufo 2012, 7). I acknowledge that this fact could potentially influence my findings.

The NGO list for this thesis ultimately combines the civil society organizations' registers from Republika Srpska and Ministry of Justice of Bosnia and Herzegovina. I chose these two as they are the most easily accessible for the public and seem rather comprehensive when it comes to the sheer number of organizations – especially the RS one. From a total of over seven thousand organizations I tried to exclude organizations that at first glance would not be normally considered NGO (i.e. neither fulfilling advocacy nor service-delivery role). These excluded organizations fell mainly within the following categories: sport clubs, professional organizations, student associations, business groups, worker's unions, and religious organizations. I kept most of the “udruzenje gradana” (citizen's association), unless their further information provided in the register indicated that they do not fall within the common understanding of NGO.

The final product has over 2000 NGOs, with the ones from RS slightly overrepresented due to the centralized nature of the source register. Apart from this, the register seems to confirm the general wisdom about NGOs geographical spread with majority of NGOs residing either in the capital or in one of the big urban centers such as Banja Luka or Tuzla.

### 4.3 Data Selection and Processing

For the data analysis I needed a representative sample of NGOs from all over the country. Therefore I divided my final register into five categories according to the geographic location of the organization: Sarajevo, ten biggest towns in Federation and in Republika Srpska, and other towns and villages in the two entities. In ideal circumstance a stratified random sampling would then be applied in order to create a data sample of 50 organizations for further analysis. However, because of the great differences in strata size (1251 versus 64 organizations in a set), the sample from the “other” category in the Federation would only be one organization, which would not be sufficient for ensuring its representativeness.

As I wanted 50 organizations with web presence for further analysis, I ended up looking across over 180 organizations from the initial list. The breakdown is presented in the table below:

	<b>Total</b>	<b>Checked</b>	<b>Selected</b>	<b>% Selected from Checked</b>	<b>% Selected from Set</b>	<b>% Checked from Set</b>
Sarajevo	370	23	10	43.5	2.7	6.2
RS Town	1251	31	10	32.3	0.8	2.5
RS Other	790	40	10	25	1.3	5
FBiH Town	129	36	10	27.8	7.8	27.9
FBiH Other	64	55	10	18.2	15.6	85.9
<b>TOTAL</b>	2604	185	50	27	1.9	7.1

I then assessed the 50 organizations based on indicators that I entitled “Bare Minimum” (BM). I drew upon several self-regulation initiatives and their forms of assessment and informed my selection of criteria by the insights gained in the literature review. The aim was not to have a comprehensive checklist, but rather a more general mapping tool that would indicate the blind spots in status quo. I found out that the framework used by One World Trust in their assessments on global level is to a great extent not usable for smaller organizations as it draws heavily upon formulation of policies (“2008 Global Accountability Report Indicators” 2008).

The BM indicators fall within three areas of accountability identified in the literature review. I concentrated predominantly on transparency as I understand it to be the base on which other accountability structures can be built. Furthermore,

I looked at participation aspect and monitoring and feedback mechanisms. All the indicators used can be found in Appendix A of this thesis. Some of the categories are rather self-explanatory (registration number, annual report) while others do benefit from further explanation which can be found below:

- **Contact Details:** This indicator falls within the participation sector as it indicates the means through which beneficiaries and other stakeholders can approach the NGO. The organization should have at least one public contact information, ideally two (one online and another more traditional (i.e. phone or post address));
- **Clear information on how public can influence organization's activities :** Either existence of a written policy indicating the means through which the public can influence the organization or an ongoing open data initiative relying on beneficiaries' input (for example, mapping of potholes for NGOs advocacy campaign);
- **Dates and Locations of Key Participation Events :** Does not indicate trainings and other activities but rather planning meetings and reporting sessions;
- **Indication of beneficiaries' involvement in annual reports :** Looks at the phases of project cycle and – usually from the reports available or from the project information – assesses the involvement of beneficiaries. Additionally, the indicator also looks at any ongoing projects that invite people to participate online in any of their phases;
- **Clear feedback mechanism :** Either specified policy for feedback from beneficiaries or an online feedback mechanism available; and

- Specified monitoring procedure: The procedure does not have to involve beneficiaries, although it preferably should. If there is an external auditor, such an information needs to be disclosed.

As I used the questionnaire for guiding my analysis, I coded the local language as Bosnian for the purpose of brevity. In reality it indicates if the materials are available in either Bosnian, Croatian or Serbian.

The assessment method partially mirrors the one used by One World Trust in its accountability frameworks. As this thesis concentrates on the online accountability forms, the subsequent discussions with the insiders and expert interviews employed in later stages of the OWT assessment are not applicable. The indicator assessment happened in May and the final check for data completion happened on 29 May 2015.

# Chapter 5

## Data Analysis

In this section I am going to present my findings on NGO online accountability in Bosnia and Herzegovina. The data presented here are based on two key pillars that were introduced in the methodology part – the NGO register and the “Bare Minimum” indicator that I created. The data on fifty organizations from all over the country suggests that the local NGOs are not using the potential of new technologies to their fullest and that their online accountability mechanisms, especially towards general public, which includes the subset of direct beneficiaries, remain rather non-existent.

In order to be able to assess the accountability practices of the non-governmental organizations in Bosnia and Herzegovina, two prerequisites are necessary. At first, one has to develop a tool by which the accountability is going to be measured – in



my case it is a questionnaire<sup>1</sup> assessing the accountability dimension of the given NGOs based on the information available online. Secondly, one needs to have a comprehensive list of NGOs active in the country in order to draw a representative sample of organizations to run the measure on. The latter proved to be somewhat of a challenge as the complicated bureaucratic nature of the BiH, described in the context chapter of this thesis allows for no actual register to exist. The process of creating the register is further commented upon in the methodology part.

## 5.1 Register

The final list that I worked with is still not complete, as it only comprises of organizations present in either the Ministry of Justice register of CSOs or the same register in Republika Srpska. These are checked against some of the voluntary subscription databases (ngo.ba, NGO database of parliament of the Federation of BiH) as well as some other publications trying to map the NGO landscape in the country. Given the rather limited time and resources, the list creation process was indeed superficial and during the data analysis part it became obvious that some of the organizations included are not NGOs in the general understanding of the term. The method is described in more detail in the methodology part of the paper. I am sharing this list on my website<sup>2</sup> inviting people who feel it is incomplete or too broad to comment on

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<sup>1</sup>The questionnaire is in Appendix A and also accessible here: [https://docs.google.com/forms/d/1wSxN7i9zSreuPZcxSz32kqNNMEstCAVbovn2PYM8q6E/viewform?usp=send\\_form](https://docs.google.com/forms/d/1wSxN7i9zSreuPZcxSz32kqNNMEstCAVbovn2PYM8q6E/viewform?usp=send_form)

<sup>2</sup>[http://ngoaccountability.eu/?page\\_id=41](http://ngoaccountability.eu/?page_id=41), accessed 2 June 2015

it.

While creating a register may seem distant to the original goal of this thesis, it actually became its indispensable part. Although registers are not always the ultimate solution for accountability situations, they are an essential part of any transparency measures. Creating the register is thus a practical addition of this thesis to the accountability debates on BiH's NGOs. As previously mentioned, there is already quite a number of similar registries existent, however, the ones open to the organizations from the whole country are usually based on voluntary-subscription and as such their membership number remains rather low. The process also showed that indeed there are many organizations registered in the country, which confirms the general wisdom. However, it also seems that many of these organizations are no longer active and they were not erased from the entities' registers. This may allude to the fact that the "vibrant civil society" may not be so vibrant after all. A proper documentation on the state level would allow for a more informed assessment of the situation on ground.

Ideally, Bosnia and Herzegovina should start to legally distinguish between NGOs and other forms of the civil society organizations. It is impractical to have the same list for bodybuilding clubs, the Helsinki Committee and youth theater groups. Such a wide definition of organizations also suggests that the benefits that NGOs enjoy in other countries (such as tax deductions, charity status, etc.) are not fully implemented in the country. At this point again, having a dedicated unified register solely for NGOs no matter from which part of the country, would provide a basis for such benefits.

## 5.2 Assessing Accountability

Using a specially crafted questionnaire I assessed the online accountability of 185 organizations. When searching for basic online information (such as existing website), I noticed that a lot of the organizations leave a very little trail of their presence – i.e. just a few local newspaper articles or registration lists and many of the organizations do not have their own website nor a Facebook page. Some of the NGOs do have a Facebook page but no website, which is a rather interesting phenomenon that should be investigated further. It could indicate a need for easy-to-adapt online environments which would at the same time provide a reach to a wider audience, thus moving away from the classic website presentation of one's organization. Out of the 185 organizations that I came across through the modified strata-based random sampling of organizations from my final list only 50 had either a website or a Facebook page or both and thus could be used for the questionnaire assessment phase.

The reason why I opted for assessing online accountability means is that new technologies are an inevitable part of the present as well as the future. Every young person in Bosnia and Herzegovina has internet connection. However, assessing online accountability has its limits and it is understandable that some organizations (i.e. pensioners' clubs, ex-prisoners of war, etc.) do not have much of an online presence. One can assume that these are mainly local member-based organizations that derive their authority from a shared common experience and that the population group they target prefers different means of communication. The overview of the final data is in Appendix B of this thesis.

### 5.2.1 Data Description

I based my data sample on two easily available registers present in the country. One of them is a centralized database of all civil society organizations in the entity of Republika Srpska while the other is a national-level register for Bosnia and Herzegovina. These two registers were chosen based on their accessibility. If an ordinary citizen looks for civil society organizations in the country and has only a superficial knowledge about the law governing these organizations, going to a central register is a logical choice. Unfortunately, such an approach is somewhat discriminatory towards the Federation as many of the organizations there are only registered at a court in their respective kantons. Such lists are however much harder to access and I was not able to find them for all of the kantons.

The final list of NGOs had 2604 entries. In order to create a representative sample from this list, I divided the entries based on their entity location as well as the size of the place they are based at. I ended up with five groups – Sarajevo (370 NGOs), RS Towns (1251), RS Other (790), FBiH Towns (129), and FBiH Other (64). For each of these groups I used a randomizer to select 10 organizations for which I looked at their web presence. As many of the organizations had little to no web presence, I repeated the random selection in total 18 times to have the desired number of organizations for this study. In total, I thus looked at 185 organizations – around 7% of all the organizations in the initial list. The fact that only about a third of these had enough information to be considered for further assessment points towards either bad quality of the entry data (linked to the fact that inactive organizations do not unsubscribe from the lists) or the generally low usage of ICTs in the NGO

sector in the country.

### 5.2.2 Findings

Through analyzing the websites of the sampled organizations, I concentrated mainly on the three aspects linked to accountability: transparency, participation, and monitoring/evaluation. While I was hoping to come across some innovative ideas of involving beneficiaries, all the organizations have failed even in what I called the “Bare Minimum” test. While the indicators are not necessarily a prerequisite for more advanced online accountability mechanisms and use of open data, their existence would point towards willingness of NGOs to consider the online sphere in their work. In this part of the thesis I am going to indicate the results of the questionnaire in terms of the three chosen domains and also comment on additional observations I made when looking for the original data.

The level of online accountability is generally low, especially when it comes to the monitoring and evaluation component. In the index that the organizations were assessed against, the three sections – transparency, participation, and monitoring and evaluation – aimed to capture the bare minimum that is relevant for a beneficiary. There are certainly gaps across the whole sector, especially when it comes to reporting on one’s activities and promoting citizens’ participation. While these findings may not reflect the reality on ground, they at least suggest that there is room for improvement in the online communication of many NGOs.

## Transparency

Most of the indicators used fell within the transparency domain. I tried to assess both structural and financial transparency, even though the latter was barely touched upon by majority of the organizations. This seems to be rather problematic, especially given the “foreign agent” accusations, which can play very well on the lack of accessible data by the NGOs. Nevertheless, overall the NGOs scored reasonably well within this section. The table below points to some of the weakest indicators (i.e. less than 10 compliant organizations):

Indicator	NGOs in Compliance
NGO Registration Number	7
List of Ongoing Projects	8
Financial Report for 2014	0
Financial Report for Years b. 2014	3
NGO Network Member	5
Bank Account Number	8
Staff Salary	1

Table 1: Financial Report 2014 and Staff Salary data are not included in the Appendix table, the full table can be found at [http://ngoaccountability.eu/?page\\_id=41](http://ngoaccountability.eu/?page_id=41)

Beyond the simple lack of data, the other common problem is presentation of invalid information. For example, “Omladinski Savjet Milici” publishes their website

information on their Facebook page – but the website itself is not accessible. Such an oversight stands in a sharp contrast to their otherwise very active posting strategy on Facebook.

## **Participation**

For the assessment itself, the participation and other information were taken predominantly from the most recent annual report, if that one was available. The quality of these reports or general information on ongoing/past projects varied to a great degree. Some of the organizations, such as “Nezavisni Biro za Razvoj”, have very detailed information in almost every area imaginable – but it is presented in such a technocratic and confusing manner that an ordinary citizen would probably not have the patience to go through all the documents available. Therefore, the sheer availability of information should not be a goal in itself as the organizations need to also figure out how to present these in an engaging and accessible manner.

Another surprising finding was that the reporting is not always catered towards the beneficiaries. For example, “Step by Step”, while having well-documented annual reports, only offers these in English. Even though this is not the place for guessing the reason behind such decision, it may suggest that the organization does aim to reach to potential foreign donors rather than the public itself. It is also rather confusing that some of the data in the report are labeled in the local language, while the rest of the report is in English. While ideally there should be two different language versions of the report, it is understandable that not every organization has the capacities to provide both. The question however remains which language version should then be

chosen. For funding purposes it is not surprising to choose English but that does limit the access to information for general public.

## **Monitoring & Evaluation**

In the monitoring and evaluation domain I looked at three indicators: feedback mechanism, monitoring procedure, and membership of a self-regulation initiative. These three aimed to capture online engagement of the general public (feedback mechanism), organizational policy (monitoring procedure), and the indication of standards that the public can hold the NGO accountable to (self-regulation).

None of the sampled organizations indicated its membership in self-regulation initiative. Given that only one of the organizations is a signatory of the Sporazum Kodex, it is not such a surprising finding – yet, it remains problematic. If the public is not informed about the principles that the organization promised to adhere to or cannot address a higher institution if they think that the organization is in breach of some of these, it severely limits the role that beneficiaries can play in the accountability relationship. Even though they can still raise their concerns through traditional means, not giving them the option to do so through existing online channels seems rather limiting.

## **Additional Findings**

I cross-listed my sample with some of the existing registries in order to find out if they are being used and if the organizations they cater to happen to be the same. There was not a single organization that would have registered in the new Federation



Registry and also be a member of either Sporazum network or on the list available at ngo.ba.

Only one of the 50 organizations evaluated has signed the Sporazum Kodex for NGOs – “Sistem”. One could thus assume that it is going to score reasonably high in all the areas as the codex calls for participation and transparency measures. However, that is not the case even in the transparency dimension, which can easily be catered to online. The NGO does not publish any of its annual reports and it does not provide any concrete information on its projects.

Out of the final 50 organizations selected, 19 have only Facebook presence. This may not be in essence limiting as Facebook page is easier to maintain than a proper website and it can provide a better contact between the organization and the general public. However, organizations with such a presence do not disclose their activities or their financial reports there. They score reasonably well on the other transparency categories, but they are still in general not as successful as the organizations with a website of some sort.

Additionally, some of the organizations are more active on their Facebook page than on their web page. If done properly, this could be a potent means of interacting with the public. On a (public) Facebook page active communication could take place, while the website serves as a static source for documenting organizations activities and a resource for procedures. However, that does not always seem to be the case, especially when the organizations present themselves as ‘persons’ rather than ‘pages’. Many organizations do not post regularly and from the presence of some, one would argue that they may have ceased to exist, for example when their last post is from

2013.

## 5.3 Conclusion

The online domain of NGO involvement remains rather limited. While it does not mean that the NGO activity and accountability on ground is limited as well, it does hint at certain weaknesses within the sector. Most importantly, given that we now live in a digital era, an online communication between NGOs and their multiple stakeholders should be a given. As data have shown, this is not always the case as less than a third of sampled organizations had any online presence at all. Secondly, the organizations that do have some presence are not using it efficiently. There is a lot of basic information missing, a substantial lack of financial transparency across the board and lack of information on the involvement of beneficiaries in the organizations' processes. The online environment could provide a space for catering to multiple stakeholder demands at the same time, but that does not seem to be the case in Bosnia and Herzegovina as for now.

## Chapter 6

### Limitations and Recommendations

This section presents the limitations of my research and recommendations for the improvement of situation on ground. The limitations are mainly related to the quality of data available and the not-precisely defined concept of online accountability itself. The recommendations encourage the CSOs to start applying the tools already developed within their own projects and activities in order to improve their accountability and legitimacy. Even though one can see the benefits of first testing the new technologies on government assessment, the CSOs cannot just preach without acting.

Online accountability in itself will not solve the “closing space” problem but it can help the existing NGOs to survive until better mechanisms of accountability and means of engagement are identified. At minimum, it would also expose the adversaries claims of lack of transparency for what they really are. The question

remains: who should be driving the accountability? If it is only a one-sided initiative a lot of needs are going to be left out. If the government is the main driving force, it can abuse its position. Donors may not always appreciate all the intricate details of the situation on ground. In short, an ideal accountability process, and it is indeed a process, should be informed by the programs multitude of stakeholders. Such adventure is obviously rather costly – both in terms of money but also other resources. That being understood, NGO networks could lower some of the costs while spreading the lessons learnt and disseminating other knowledge.

## 6.1 Limitations

As indicated in the methodology section, the final list of NGOs still contains some organizations that would not generally be understood as such. This is caused by the fact that the legal system in the country does not properly distinguish between various forms of citizen association. Furthermore, the over-representation of NGOs from RS could have also influenced my findings. I tried to balance it by choosing an equal number of organizations from each of the strata, but the rather limited choice in FBiH Other category could still have some effect.

The sheer existence of some of the tick-boxes (i.e. contact information) does not mean that they are being used neither I tested for them still being active/valid. I also did not test for the correctness of the data in the reports or other informations available. While relying on the honesty of the organizations I also think that they would not compromise themselves by making false data public.

One could argue that the indicators used are not really capturing the essence of accountability. I am inclined to partially agree with such an assessment but would still say that the BM indicator used aims to highlight the minimal requirements (albeit with some advanced points such as staff salary disclosure). It thus forms a baseline on which more advanced indicators can be built. More criteria may however not always work in advancing the accountability itself. Too complicated a scheme requires additional time from the staff and may not encourage the learning process. Moreover, there is definitely no one-size-fits-all approach when it comes to accountability and as such some organizations may not have the need for fostering the online dimension of the concept.

## 6.2 Recommendations

The study conducted as part of this thesis points towards almost non-existent online accountability towards beneficiaries. There is definitely a big space for improvement, starting with the transparency domain. The downward online accountability of NGOs in Bosnia and Herzegovina could be improved by several measures. Some of them can be implemented through the whole sector, either by government-led initiative or through some sort of self-regulation system, while other changes need to be undertaken by the NGOs individually. Copycat projects based on other successful data initiatives could definitely lower the costs and demand for other resources.

On the sector-wide level the point to start would be a comprehensive NGO registry. For that to happen a legislation clearly distinguishing between NGOs and

other forms of CSOs needs to be introduced. As there have been numerous previous attempts, one can learn from them why they failed. Additionally, for such a registry to be a valuable resource, it needs to contain usable information available to all the stakeholders. In the spirit of open data, the register should then be more of a platform where NGOs not only have their registration number and official name but also profile with their mission, projects, and organizational policies.

Greater financial transparency could be provided if the option of the so-called transparent bank accounts would be available to institutions in Bosnia and Herzegovina. There, the flow of money could be easily viewed by any of the stakeholders without extra work required by the members of the NGO staff. Financial transparency can contribute to busting the myth of extraordinary salaries in the sector as well as indicate the donor body. Such initiatives were discussed last year with relation to the floods in the country, but the discussions never materialized.

The NGOs themselves need to embrace the opportunities that new technologies bring to the sector. For one, the easier access to data can help them in their advocacy efforts as well as coalition-building. They, however, need to also identify the best ways to use these technologies in order to benefit their beneficiaries. For example, the service-delivery NGOs can get inspired from the International Red Cross Red Crescent efforts in informing their constituency via text messages. This lowers the requirement of media/technology literacy while ensuring that people are part of the project.

Promoting online accountability could also empower those, who would be voiceless in public meetings with a community authority present (for example women).

To secure their involvement the process needs to ensure their anonymity (if wished so) or at minimum their privacy and data protection.

Greater public participation in the affairs of civil society can help bridging some of the legitimacy gap that is often mentioned by critics of the sectors. It is also not so far fetched to imagine that participation and monitoring in projects can in a long term lead to requirement of the same principles vis-à-vis politicians, whether on a local or national level. Increased use of open data could also lead to new ways of co-operation between the different sectors of society. As the example of Illegal Dumps project from Gjakova shows, the combination of transparent municipal data together with an original research can lead to a more holistic assessment of the situation on ground than either of the two parts would do on their own.

The new technologies present a huge potential for NGOs both in their advocacy and service-delivery roles but also in their conduct. The greater involvement of beneficiaries through these new means could ensure the long-term sustainability of the NGOs' projects and wiser spending of donors' money.

# Chapter 7

## Conclusion

The civil sector remains vibrant in Bosnia and Herzegovina but the recent discussions about legal amendments in Republika Srpska possibly signify the beginning of a new era modeled upon the Russian approach to civil society organizations. This thesis explored the state of art in the online accountability domain as a possible preventive measure to counter the narrative of NGOs as “foreign agents” and to further good governance measures.

The lack of the tools available for assessing online accountability as well as the limited existing data input has led me to creation of the list of “Bare Minimum” indicators and NGO registry for the whole country. These two documents, together with my website, then present my practical additional to the NGO accountability debate.

As my investigation of the status quo showed, the online presence of NGOs is



minimal. While the literature suggests that we need to move beyond websites and Twitter accounts, without the bare minimum being applied, it seems rather impossible to employ further accountability means. Transparency – factual, financial, and organizational – needs to be taken for granted. Means for online participation, monitoring and complaints procedure should be tailored according to every organization's needs. Minimally, the organization should address its policies regarding these domains as part of its online presence, even though this obviously falls very short of the active accountability process and also does not take advantage of all the available technologies.

Pursuing online accountability is by no means an easy task and the NGOs need to consider many dimensions before its implementation. For example, the safety of the data accessible and the privacy of the beneficiaries. Many lessons can be taken from already applied projects targeting other domains, even though further research would be needed to assess the level to which the tools are mutually transplantable. The common wisdom has it that no single approach can work for everybody, so certain variability in implementation is to be expected. However, at minimum, the leading principles – such as maximum sharing and openness of the data – should be kept.

# Appendix A

## “Bare Minimum” Indicators

### Transparency

- NGO Registration Number
  - Yes
  - No
- NGO Establishment Data (i.e. when and which body)
  - Yes
  - No
- NGO HQ address
  - Yes
  - No
- Clear Mission Statement
  - Yes

– No

- List of Ongoing Projects

– Yes

– No

- List of Past Projects

– Yes

– No

- Annual Report for 2014

– Yes in ENG/Bosnian

– No

– N/A (new organization)

– Yes in ENG

– Yes in Bosnian

- Financial Report for 2014

– Yes in ENG/Bosnian

– No

– N/A (new organization)

– Yes in ENG

– Yes in Bosnian

- Annual Report for year(s) prior to 2014

– Yes in ENG/Bosnian

– No

– N/A (new organization)

– Yes in ENG

– Yes in Bosnian

- Financial Report for year(s) prior to 2014

- Yes in ENG/Bosnian
- No
- N/A (new organization)
- Yes in ENG
- Yes in Bosnian

- Names of Staff

- Yes
- No

- Hierarchy Structure

- Yes
- No

- Staff Salary Disclosure

- Yes
- No

- Specified Donors (or at minimum percentages of foreign/member-based/state funding)

- Yes
- No

- Bank Account Number Published

- Yes
- No

- Reports on whether it is a member of a certain NGO network

- Yes
- No

- Last information post published

- Date

## Participation

- Contact Details
  - telephone
  - e-mail
  - contact form on the website
  - links to social media/accounts
- Clear information on how public can influence organization's activities
  - Yes
  - No
- Dates and Locations of Key Participation Events
  - Yes
  - No
- Indication of beneficiaries' involvement in annual reports
  - Yes - in all phases of the project cycle
  - No
  - N/A (no reports)
  - Yes - in implementation phase
  - Yes - in planning phase
  - Yes - in monitoring/evaluation

## Monitoring & Evaluation

- Clear feedback mechanism
  - Yes
  - No
- Specified monitoring procedure
  - Yes

- No
- Indicated membership of self-regulation initiative
  - Yes
  - No

# Appendix B

## “Bare Minimum” Findings

Part 1:

NGO Name	FBIH Parliament	NGO.BA	SPORAZUM	KODEX	Registration Num	HQ Address	Mission Statement	Ongoing Projects	Past Projects	Annual Report 2014	Reports Prior 2014	Names of Staff	Hierarchy Structure
Step by Step	N	Y	N	N/A	N	Y	Y	Y	Y	N	Y-E	Y	Y
Stara Gora	N	N	N	N/A	N	Y	Y	N	Y	N/A	N/A	N	N
SISTEM	N	N	Y	Y	N	Y	Y	N	N	N	N	N	N
Udruzenje za pomoc djeci sa posebnim potrebama Teslic	N	N	N	N/A	N	Y	Y	N	N	N	N	Y	Y
S.O.S Prava	N	N	N	N/A	N	N	Y	N	N	N	N	N	N
UPUO	N	N	N	N/A	N	N	Y	N	N	N/A	N/A	Y	Y
Izvrnost	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N

Centar za Odrzivi Razvoj	Y	N	N	N/A	N	Y	Y	Y	Y	Y-B	Y-E/B	N	N
Udruženje Žena San	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Horizon 2024	N	N	N	N/A	N	Y	N	N	Y	N/A	N/A	N	N
Romi bez Granica	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Graditelji Mira	N	N	N	N/A	N	N	N	N	Y	N	N	N	N
Asocijacija Mladih Vranjak - AMV	N	N	N	N/A	N	N	Y	N	Y	N	N	N	N
Nezavisni Biro	N	N	N	N/A	Y	Y	Y	Y	Y	N	Y-B	Y	Y
Centar za mlade "KVART"	N	N	N	N/A	N	Y	Y	N	Y	N	N	Y	Y
Strateg	N	N	N	N/A	N	N	Y	N	N	N	N	N	N
Delije Sever Prnjavor	N	N	N	N/A	N	N	N	N	N	N	N	N	N
YIHR BIH	N	N	Y	N	N	Y	N	N	N	N	N	N	N
Info House	N	Y	Y	N	N	Y	Y	Y	Y	N	Y-B	Y	N
Kulturna Zajednica Novljani	N	N	N	N/A	N	N	N	N	N	N	N	N	N
ECO Line	N	Y	N	N/A	N	N	N	N	N	N	N	N	N
Vrisak	N	N	N	N/A	N	Y	Y	N	N	N/A	N/A	N	N
Mladi Evropski Federalisti (MEF)	N	N	N	N/A	N	N	Y	N	N	N	N	N	N
Kriva Rijeka	N	N	N	N/A	N	Y	Y	N	N	N	N	N	Y
Omladinska organizacija "Centar" M. Grad	N	N	Y	N	N	N	Y	N	N	N	N	N	N
Nova Vizija	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N
Omladinski Centar Čelinac	N	Y	N	N/A	N	N	N	N	N	N	N	N	N
Sume RS	N	N	N	N/A	N	Y	Y	N	N	N	N	N	Y



Quaestio Prudentiae	N	N	N	N/A	N	Y	Y	N	Y	N	N	N	N
Zavet	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Centar za Prirodu, Ekologiju, Turizam	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N
Udruzenje Dijabeticara Prijedor	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Centar za Razvoj i Podrsku	N	N	Y	N	Y	Y	Y	Y	Y	N	N	Y	Y
Bosper	N	Y	N	N/A	N	Y	Y	N	N	N	N	Y	Y
BIRN	N	N	N	N/A	N	N	Y	N	N	N	N	N	N
Udruzenje Amputicara	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Novi Put	N	Y	Y	N	N	Y	Y	N	N	N	N	N	N
Lokalna Akciona Grupa	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N
Prava za Sve	Y	N	N	N/A	N	Y	Y	Y	Y	N	N	N	N
Most Mira	N	N	N	N/A	Y	Y	Y	N	N	N	Y-E	Y	Y
GONG	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N
Inicijativa Preziviljenih od Mina	N	N	Y	N	Y	Y	Y	N	Y	N	N	N	N
E Grupa	N	N	N	N/A	Y	Y	Y	N	N	N	N	Y	Y
TU Posavina	N	N	N	N/A	Y	Y	Y	N	N	N/A	N/A	Y	Y
Savjet Mladih Rogatica	N	N	N	N/A	N	N	N	N	N	N	N	N	N
Savez za Ruralni Razvoj	N	N	N	N/A	N	Y	Y	N	N	N	N	N	N
Savez Dijabetologiskih Udruzenja	N	N	N	N/A	Y	Y	Y	Y	Y	N/A	N/A	Y	Y

Regionalna koordinacija udruženja porodica nestalih lica	N	N	N	N/A	N	N	Y	N	N	N	N	N	N
Crveni Krst	N	N	N	N/A	N	Y	Y	Y	Y	N	N	Y	Y
Omladinski Savjet Milici	N	Y	N	N/A	N	Y	Y	N	N	N	N	N	N

**Explanations:**

Y-E: Yes in English

Y-B: Yes in Bosnian

Y-E/B: Yes in both

## Part 2:

NGO Name	Contact Details	Beneficiaries in Reports	Financial Reports Prior 2014	Specified Monitoring Procedure	Specified Donors	Reports on NGO Network Membership	Last Information Post Published	NGO Establishment Data	Bank Account Number Published	Dates and Locations of Key Events
Step by Step	telephone, email, social media	Y-I	N	N	Y	Y	2015-05-18	Y	N	N
Stara Gora	telephone, contact form	N/A	N/A	N	N	N	2015-05-23	Y	N	N
SISTEM	telephone, email, contact form, social media	N/A	N	N	N	N	2015-05-26	Y	N	N
Udruzenje za pomoc djeci sa posebnim potrebama Teslic		N/A	N	N	Y	N	2015-05-27	Y	Y	N
S.O.S Prava	telephone, email, contact form, social media	N/A	N	N	N	N	2014-09-20	N	N	N
UPUO	telephone, email, social media	N/A	N/A	N	N	N	2015-10-30	Y	N	N
Izvrnost	telephone, email	N/A	N	N	N	N	2014-11-07	N	N	N

Centar za Odrzivi Razvoj	telephone, email, contact form, social media	N	Y-B	N	Y	N	2015-20-04	N	N	N
Udruženje Žena San		N/A	N	N	N	N	2015-05-19	N	N	N
Horizon 2024	telephone, email, social media	N/A	N/A	N	N	N	2015-04-13	Y	N	N
Romi bez Granica		N/A	N	N	Y	N	2012-05-28	N	N	N
Graditelji Mira		N/A	N	N	N	N	2013-06-21	Y	N	Y
Asocijacija Mladih Vranjak - AMV	e-mail	N/A	N	N	Y	N	N/A	Y	Y	N
Nezavisni Biro	telephone, e-mail	Y-I	Y-B	N	Y	Y	2015-05-25	Y	N	N
Centar za mlade "KVART"	telephone, e-mail	N/A	N	N	N	N	2015-05-20	Y	N	Y
Strateg	telephone, e-mail	N/A	N	N	N	N	2014-11-02	N	N	N
Delije Sever Prnjavor		N/A	N	N	N	N	2015-01-05	N	N	N
YIHR BIH	telephone	N/A	N	N	N	N	2015-05-28	N	N	N
Info House	telephone, e-mail	Y-I	Y-B	N	Y	N	2015-05-26	Y	N	N
Kulturna Zajednica Novljani		N/A	N	N	N	N	2015-04-04	N	N	N
ECO Line		N/A	N	N	N	N	2015-05-06	N	N	N
Vrisak	e-mail, contact form	N/A	N/A	N	N	N	2015-05-22	N	N	N
Mladi Evropski Federalisti (MEF)		N/A	N	N	N	N	2015-05-26	Y	N	N
Kriva Rijeka	telephone, e-mail	N/A	N	N	N	N	2012-03-01	Y	Y	N
Omladinska organizacija "Centar" M. Grad	telephone	N/A	N	N	N	N	2015-05-28	Y	N	N
Nova Vizija	telephone, e-mail	N/A	N	N	N	N	2014-04-27	Y	Y	N

Omladinski Centar Čelinac		N/A	N	N	N	N	2015-05-21	N	N	N
Sume RS	telephone, email, contact form	N/A	N	N	N	N	2015-04-22	Y	N	N
Quaestio Prudentiae	email, contact form	N/A	N	N	N	N	2014-04-12	Y	N	N
Zavet	contact form	N/A	N	N	N	N	2015-05-05	Y	N	N
Centar za Prirodu, Ekologiju, Turizam	telephone, e-mail	N/A	N	N	N	N	2013-01-10	Y	Y	N
Udruzenje Dijabeticara Prijedor		N/A	N	N	N	N	2015-04-25	N	N	N
Centar za Razvoj i Podrsku	telephone, email, contact form, social media	N/A	N	N	Y	N	2015-05-27	Y	N	N
Bosper	telephone, email, social media	N/A	N	N	Y	Y	2015-05-26	Y	Y	N
BIRN	telephone, e-mail	N/A	N	N	Y	N	2015-05-28	Y	N	N
Udruzenje Amputicara		N/A	N	N	N	N	2015-01-16	N	N	N
Novi Put	telephone, e-mail	N/A	N	N	N	N	2015-05-15	N	N	N
Lokalna Akciona Grupa	telephone, contact form	N/A	N	N	N	N	2015-04-30	Y	N	N
Prava za Sve	telephone, email, contact form, social media	N/A	N	N	N	N	2015-05-25	Y	N	N
Most Mira	contact form, social media	Y-I/P	N	N	Y	N	2015-04-26	Y	N	N
GONG	telephone, e-mail	N/A	N	N	N	N	2014-05-28	N	N	N
Inicijativa Prezivljenih od Mina	telephone, email	N/A	N	N	Y	Y	2015-01-05	Y	N	N
E Grupa	telephone, email, social media	N/A	N	N	Y	N	2015-02-19	Y	Y	N
TU Posavina	e-mail	N/A	N/A	N	N	N	N/A	Y	N	N

Savjet Mladih Rogatica		N/A	N	N	N	N	2015-05-21	N	N	N
Savez za Ruralni Razvoj	telephone, e-mail	N/A	N	N	N	N	2015-02-24	N	N	N
Savez Dijabetologiskih Udruzenja	telephone, e-mail	Y-I/E	N/A	Y	Y	N	2015-05-18	Y	Y	N
Regionalna koordinacija udruzenja porodica nestalih lica	e-mail	N/A	N	N	N	N	2014-12-18	Y	N	N
Crveni Krst	telephone, email, contact form, social media	Y-I	N	N	N	Y	2015-08-05	Y	N	N
Omladinski Savjet Milici	telephone, e-mail	N/A	N	N	N	N	2015-05-28	N	N	N

**Explanations:**

Y-I: Yes, implementation

Y-E: Yes, evaluation

Y-P: Yes, planning

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