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BOTTOM-UP VERSUS TOP-DOWN LOCAL GOVERNANCE: LOCAL GOVERNMENT ANTI-CORRUPTION APPROACHES IN THE SLOVAK TOWNS OF SALA AND MARTIN COMPARED (CASE STUDY)

Tomas Jacko¹

Abstract

The paper provides a comparative case study of successful local governance approaches to fighting and preventing corruption at a local government level in Slovakia. The towns' administrations of Martin and Sala implemented large-scale anti-corruption reforms during the past 6 years which have led to domestic and international accolades. The author shows how different approaches to administrative reform based on the same basic governance principles can deliver similar outputs and outcomes in the field of local governance. The article also takes into consideration the local administrative reform efforts prior to the successful town administrations' reforms, which had started in the early 1990s and which have also made it possible for the respective town administrations to reform themselves.

Key words: local governance, corruption, transparency, administrative reform, Slovakia

Introduction

The paper provides a comparative case study of successful local governance approaches to fighting and preventing corruption at a local government level in Slovakia. The towns' administrations of Martin and Sala implemented large-scale anti-corruption reforms during the past 6

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years which have led to domestic and international accolades². The author shows how different approaches to administrative reform based on the same basic governance principles can deliver similar outputs and outcomes in the field of local governance. The article also takes into consideration the local administrative reform efforts prior to the successful town administrations' reforms, which had started in the early 1990s and which have also made it possible for the respective town administrations to reform themselves.

The author examines how a mayor and a deputy mayor of two Slovak towns and their administrations managed to introduce and fully implement large-scale anti-corruption measures at their town halls. The two case studies show contrasting approaches to public administration reform. Martin's approach was a typical example of top-down local governance. The town mayor rapidly implemented in a relatively short space of time a complex and externally engineered anti-corruption programme. By contrast, the Sala case study shows that local anti-corruption efforts can be initiated "at the bottom" by local anti-corruption activists, hence the phrase bottom-up local governance. Furthermore, Sala's anti-corruption programme was devised internally, included more basic measures and the change was delivered in a more incremental way compared to Martin.

The paper provides short narratives of the case studies with particular attention given to initiation and delivery of the far-reaching anti-corruption and local governance measures. The case study research has been based on documents, observations, opinion poll performed in 2010 in Martin, interviews conducted in 2009, and media coverage. These include both local and national newspapers, documents which were part of the Transparent Town project as well as mayor Hrnčiar's and deputy mayor Meciár's personal blogs and websites. The opinion poll was carried out in September 2010 and asked a representative sample of Martin's inhabitants about their views on corruption and also about the Transparent Town project. As for the interviews, not only mayor Hrnčiar and deputy mayor Meciár were interviewed but also a number of councillors, staff members, working partners from

² **The Town of Martin was awarded the first place in the 2011 United Nations Public Service Awards in the category Preventing and combating corruption in the public service (region North America and Europe) and came as third in the 2010 Open Local Government survey (conducted by Transparency International Slovakia). Sala on the other hand came as first in the 2010 Open Local Government survey and it was also awarded the "Infocin" 2007 award (1st place), HESO Regions 2007 (1st place - informing) and 2008 (1st place - procurement), and ITAPA 2009 (3rd place – electronic self-government).**

Transparency International Slovakia and other local anti-corruption initiatives (Jacko, 2009).

Extensive literature exists on the topic of New Public Management reforms and on application of good governance principles into public processes (e.g. Osborne and Gaebler, 1993; Pierre and Peters, 2000; Barzelay, 2001; Pollitt, 2003; Pollitt and Bouckaert, 2004; Lynn, 2006; Lane, 2007; Lynn and Hill, 2008). However, the topics still deserve more attention in the context and political environment of Central and Eastern European (CEE) countries which started to introduce such ideas only in the late 1990s and early 2000s. Moreover, local political leadership has been a well-researched field both in the US (e.g. Kotter and Lawrence, 1974; Stone, 1989; Svava, 1990, 1994) and Europe (Pratchett and Wilson, 1996; John and Cole, 2000; Leach and Wilson 2002; Berg and Rao, 2005; Haus and Sweeting, 2006). However, regarding Slovak local governance, administrative and anti-corruption reforms, and political leadership; so far only limited if any academic research has been conducted.

On Slovak local government

Slovakia has three tiers of government: national, regional and local. Local government (i.e. municipal government or municipalities) comprises a directly elected mayor and directly elected council members (i.e. councillors). There are more than 2900 municipalities, each having its own mayor and council members. Elections are held every four years. In contrast to national elections, independent candidates are free to stand in both regional and local elections. Petržalka, a city part of Bratislava, has the highest population (110,000). The capital city Bratislava (population 450,000) and the second largest city Kosice (population 230,000) have a special status but they are also considered as local governments with their own city mayors and city councils. Smallest municipalities have less than 10 inhabitants and there are hundreds of municipalities with less than a hundred inhabitants. The 100 largest municipalities by population comprise more than a half of the Slovak population. The other half lives in the rest 2800 towns and mostly villages. Martin with its population of nearly 58,000 is the 8th largest town in Slovakia. Sala with its population of 23,000 is the 30th largest Slovak town.

Public administration reform in Slovakia which commenced in 1990 granted Slovak municipalities significant amount of independence. Even compared to the Czech Republic, Slovak municipalities were given a considerable amount of freedom to govern and control themselves. All Slovak municipalities not only elect their own mayors by popular vote but

also choose and council members vote for their own auditors. The only remaining state control over municipalities is the Supreme Audit Office which however has more or less only advisory and not legally binding powers. The police and the prosecutors should act in cases of corruption or breaches of law and corruption, but the 20 years of Slovak independent municipal experience show that even in cases of serious misconduct and breach of law, municipal representatives have not been successfully prosecuted and punished³. Instead, a mayoral recall election often remains the only chance for effectively and in a relatively short time removing and replacing a corrupt mayor. In terms of local governance, the small population size of Slovak municipalities on one hand but a large number of council members on the other, make it arguably difficult to implement modern elements of the governance concept. Nevertheless, this paper will show two case studies of Slovak municipalities which successfully managed to deliver good governance principles as a result of their anti-corruption efforts. It is up to the reader to decide whether they occurred more as a matter of luck and coincidence or as carefully planned and delivered policies worth being transferred to other Slovak and CEE countries.

Slovak legislation sets standard rules which cover local government and conduct of local government officials. However, despite having one of the most decentralised and hence arguably most democratic local governments in Europe⁴, only a limited number of municipalities prior to Sala's initiative and the Martin town project, had been willing to disclose more information and make governance more open than the minimal standard prescribed by the law. Public officials even in Sala and Martin preferred to make decisions behind closed doors (TIS, 2008). Perhaps without any wrong intentions but nevertheless ruling out the public eye from the decision-making process. There are numerous cases in Slovakia of local governments and their leaders who have exploited the legislation and legislative loopholes, ineffective police, prosecution and judiciary which in the end all permit them to be untouchable. Partly a result of such news reports, the Slovak public loses trust not only in the municipalities but also in other public institutions and representative democracy as a whole. It is for cases such as Sala and Martin that attempt to prove the sceptic wrong.

³ See for example <http://www.zomos.sk/pribeh/>, <http://www.brunovce.otvorene.sk/> .

⁴ For instance, it is not common in all European and CEE countries in particular to have elected mayors in all municipalities.

Sala

Sala's case study will be portrayed in three distinct periods: opposition years (2002-2006), years of change (2007-2010) and Sala 2.0 (2010 onwards). The story describes the efforts of a locally formed initiative with an IT skilled local anti-corruption champion who attempted to push for a local governance reform in their small town. The anti-corruption reform plans were included in their election manifesto. The reform was basic in nature, devised internally, and changes were delivered incrementally (see Figure 1).

Opposition years (2002-2006)

Most of the anti-corruption measures in the town of Sala would not have been passed, had it not been for Jozef Meciár, a former IT expert and present day Deputy Mayor of Sala. He and his friends formed an unofficial local initiative in Sala in the early 2000s and later founded an NGO named *Lepsia Sala* [Better Sala]⁵. Similarly to other local anti-corruption initiatives which were at the time united under the *Antikor*⁶ banner, *Lepsia Sala*'s main goals among others were to bring more transparency into local governance; allow citizens greater control and participation in the local decision-making processes; and fight against corruption, nepotism and inefficient use of public resources. They were no anti-corruption experts but local citizens covering various professional fields. Meciár himself admits that their anti-corruption efforts were drafted spontaneously "in a pub" (Meciár, 2009).

The greatest success during this opposition period was a motion lobbied by their NGO, which was passed by the Sala town council on 28 October 2004 ("motion on automated information publishing" [uznesenie o automatizovanom zverejnovani informacii]). It made the town hall publish a lot of information online for the first time including all publicly available documents, forms and regulations, staff and officials' contact details, and last but not least, all answers and information provided through freedom of information act requests. Although some other original proposals were scrapped, it was this last measure which allowed all information to be published anyway since activists from the *Lepsia Sala* NGO then filed

⁵ For more information, see the old website <http://www.lepsia-sala.sk/index.php> or current Facebook page <http://sk-sk.facebook.com/LepsiaSala> .

⁶ *Antikor* is a Slovak online anti-corruption community which electronically shares information and experience about their fight and efforts, mostly in their municipalities. It emerged around the year 2004. In 2010, some of the *Antikor* members founded an NGO ZOMOS [Zdruzenie obcanov miest a obci Slovenska].

numerous freedom of information requests which had to be published online including answers to them. Their efforts and also data they were able to uncover, helped them to get elected and win seats in the Sala Town Council in December 2006.

Years of change (2007-2010)

December 2006 local election brought in a number of councillors who belonged to the Lepsia Sala NGO. Their main election pledge was to fight against corruption and to bring more transparency into the municipal government. They also advocated other proposals which could be considered as good governance driven (Meciar, 2009). Due to positive election results and the coalition potential, Jozef Meciar was also appointed as the Sala Deputy Mayor. It was mainly thanks to this executive position that he was able to push for and deliver most of the reforms in the following years.

Among the various effective anti-corruption measures were the following: compulsory e-auctions on all procured products and services (even low cost), all invoices and contracts published online, information and cost of municipal employees' business trips published online. All of these measures came into practice in 2007 and 2008, so almost 4 years before e-auctions and local government contracts had to be published by law (Meciar, 2012). For example, savings in public procurement were up to 30 per cent less than the originally planned budgetary items (Meciar, 2012). What is more, the new town executive also encouraged council members including opposition parties and independent councillors to take part in the public procurement process. Interestingly, as a result of a different approach of the new town executive, the then opposition also underwent transformation and according to Meciar, went through 3 stages: reluctance, cooperation, and finally own initiative (Meciar, 2010). This shows how different the governance approach was perceived by the town executive compared to the period before. Instead of following a strict party and political line and engaging in adversarial politics, the new town management offered and encouraged the opposition and the public to cooperate towards a better functioning and open local government. It is due to these efforts and concrete results that the town was awarded numerous awards, mainly in the field of e-governance and government openness.

For instance, in order to compare different approaches to open local governance, one can compare the 2002-2006 and the 2007-2010 period in terms of involvement and membership of public procurement commissions. Figure 2 clearly shows that the average number of

commission members who were responsible for public procurement rapidly increased during the period of 2007-2010 compared to the previous election period (from the average number of 4.2 to 7.9). This was also reflected in the average number of council members present. From the average of 0.7 in 2002-2006, the number increased to 3.6 council members present per public procurement. And lastly, the town hall executive and coalition councillors also encouraged and made it possible for the opposition and independent councillors to take part in the public procurement selection process. This resulted in the increased number of opposition council members being involved, which rose from the average of 0.2 to 2.8.

Sala 2.0 (2010 onwards)

Sala and its town management has continued with its open local governance policies after the November 2010 local election. Town's executive including the deputy mayor were reelected and the town hall is currently working on the Sala 2.0 project which includes even more emphasis on e-democracy and among the planned policies are e-forms, e-petitions, opinion polls, discussion forums, and other e-government initiatives (Meciar, 2010)⁷.

Martin

Andrej Hrnčiar, another local governance pioneer, though of a different kind, managed to introduce and fully implement large-scale anti-corruption measures at his town hall in just two years between 2008 and 2009 and also, similarly to Jozef Meciar, during his first term in office. Andrej Hrnčiar being an independent candidate and a former professional theatrical actor, the odds of successfully implementing externally-drafted anti-corruption measures in 17 crucial town policy areas were all but in his favour. Despite being a political outsider and not belonging to any local political initiative or faction, Hrnčiar managed to gain enough popular support to win the mayoral election in December 2006 and later skilfully secured unanimous support from various local political factions to successfully pass an unprecedented package of anti-corruption measures. Interestingly and largely due to his non-political background, the mayor had previously had only limited knowledge of public management and local government processes and structures. Thus, various features and elements of New Public Management (NPM) and good governance principles were implemented as a matter of pure coincidence and rather as a by-product of the concrete anti-corruption

⁷ For more information on Sala 2.0, see <http://www.sala.sk/cms.article/default/796/sala-2-0-v-spojeh>.

measures. Compared to a limited number of similar anti-corruption strategies that can be identified in other local governments in Slovakia such as in Sala, Martin has been the first local government to carry out such a multi-faceted approach to fight and prevent corruption and at the same time to uphold principles of good governance. By doing so and thanks to national media, Martin has now become a well-known case study and an inspiration for other municipalities and mayors throughout Slovakia and abroad.

Except for the Sala case study, the author identified two other international case studies worth mentioning: Mangalia (Romania) and La Paz (Bolivia). Balta provides a useful narrative of the Romanian City of Mangalia and one can draw parallels between the Romanian city's transition following an election victory of mayor Zamfir Iorgus in 1996 (Balta, 2002) and the transition of the town of Martin following the election victory of Andrej Hrnčiar in 2006. Another, and perhaps one of the best known case studies of implementation of anti-corruption measures in local government in the world is the effort of the then mayor of La Paz, Ronald MacLean Abaroa, in the late 1980s. Both Iorgus and Abaroa managed to transform their cities during their terms in the office. While Iorgus implemented management reforms and set clear and perhaps populist targets, Abaroa and Hrnčiar concentrated on the delivery of anti-corruption measures in unique and unprecedented ways.

The paper will now explore all stages of the Martin anti-corruption project including the situation before, policy initiation, policy formulation, policy implementation and impact together with reactions. The project was also officially divided into three phases:

- First phase: May 2008 – August 2008; included an audit of selected policies of the town
- Second phase: September 2008 – April 2009; included preparation and approval of anti-corruption measures in selected town policies
- Third phase: May 2009 – today; has included implementation of accepted measures into everyday life
- (Martin Town Hall, 2010)

Situation before

Martin had been previously a typical example of a larger Slovak town – facing common problems to other towns and cities in post-communist transition: lack of job opportunities following closures of industrial and subsidised plants, high corruption, lack of trust in public institutions, and limited public participation being just to name a few. Martin had a long

serving mayor who did not have a bad record of corruption but who was nevertheless seen as having an authoritative and directive style of leadership (Jacko, 2009). The 2006 election brought together three strong candidates, all representing different political programmes and visions (left, right, independent). Hrnčiar, a theatrical actor by profession and a director of the Martin Town Theatre at the time was a political outsider without any political party support and prior political experience. Nevertheless, Hrnčiar managed to win the election with 32.7 per cent of the votes (5379 votes) which was more than a thousand votes ahead of the then mayor. Hrnčiar's main political advantage was his clean political record. Based on the interviews conducted, voters were in 2006 tired of party politics and wanted an independent candidate instead. Interestingly, Hrnčiar's election manifesto compared to Jozef Meciár's did not include the Transparent Town project and/or open government and anti-corruption policies (Jacko, 2009). Also, Jozef Meciár did not stand as a mayoral candidate but instead as a council member candidate.

According to the audit carried out by Transparency International Slovakia (TIS, 2008) which was part of the project, the town hall showed limitations in almost all of the 17 policy areas. The public had previously had only very limited options to control, check and hold their elected representatives or Town Hall employees accountable. According to Hrnčiar, tenders had previously been won only by a small group of contractors and were heavily overpriced. Furthermore, the mayor himself had been approached by public procurement bidders who tried to pressure and corrupt him (Hrnčiar, 2009). According to Hrnčiar, he as a political newcomer needed some time to familiarise himself with all the necessary local government processes, procedures and also have his predecessor's deals and decisions audited. He then came into conclusion that it would be necessary to implement far-reaching measures in order to secure lasting transparent and open government principles in the town (Jacko, 2009; Martin Town Hall, 2010; Hrnčiar, 2011).

Initiation

It was February 2008 when Martin Town Mayor, Andrej Hrnčiar, contacted the then President of Transparency International Slovakia (TIS), Mrs Emilia Sicakova-Beblava, and showed interest in anti-corruption measures being applied in his town. Following an advice from TIS, Hrnčiar decided to implement a complex project, covering all areas of local government prone to corruption. In May 2008, the Martin Town Council agreed to pay TIS € 23,300 from the town's budget to deliver the project. The project and its initiation stage is rather extraordinary

regarding its timing. The landmark project was initiated in early 2008 despite not being included in Hrnčiar's 2006 election manifesto and further, it was more than a year after Hrnčiar had taken office that he contacted the TIS President (Jacko, 2009). We could apply Kingdon's concept of *windows of opportunity* (1995), who argues that such windows open in policy systems but stay open only for short periods of time and hence a policy initiator must make use of the advantage while it is there to be taken. His politically neutral background, largely supportive Town Council at the time, and his superior communication and persuasion skills and last but not least the then absence of the economic crisis, allowed him to introduce such radical measures (Jacko, 2009).

Policy formulation

Despite the overlap between the proposed anti-corruption measures and new public management (NPM) and good governance principles, the main purpose of the project was not to bring Martin Town Hall's administration processes in line with the ideas and philosophy of NPM and/or any other public management trends. Instead, the TIS team devised an unprecedented blueprint document which included specific recommendations for 17 town policies (Figure 3) that covered all areas prone to corruption in the town (TIS, 2009). Rather than following managerial manuals, NPM and governance literature, or texts covering organisational leadership, TIS focused on Robert Klitgaard's famous yet simplistic formula⁸ as a basis for their policy formulation (Klitgaard 1998; TIS, 2008 and 2009). Resulting policy document (TIS, 2009) had 130 pages and included general recommendations together with specific policy formulations and document drafts.

Once TIS delivered their anti-corruption blueprint, recommendations and policy formulations had to be approved by the relevant Town Hall departments. Martin Town Hall's Manager was in charge of consolidation. She and senior Town Hall officials scrutinised all the recommended policies and if needed adjusted them to fit the Slovak legal system. Once checked and ready to be passed, the mayor called in May 2009 an extraordinary council meeting which had only one issue on the agenda: the anti-corruption package.

⁸ Klitgaard's formula for analysing the tendency for corruption to exist: Corruption = Monopoly + Discretion - [Accountability](#)

Implementation

The anti-corruption package was successfully passed and won votes from all the councillors. Both TIS and Town Hall representatives agreed that if one compares the package which was voted on with the original recommendations devised by TIS, there is an approximately 80 to 90 per cent overlap (Jacko, 2009). The vote in the Council signalled the beginning of the implementation stage (or third phase of the project). The Town Hall soon started to follow new measures such as the Ethical Code for all employees of the Town Hall; new procedures covering hiring of staff; proactive provision of information; electronic public procurement and e-auctions; electronic disclosure of town contracts and invoices; etc. (Martin Town Hall, 2010). On top of the official anti-corruption package, the Town Hall started to organise and added new anti-corruption and good governance features such as open days, information campaigns, map of electronic auctions, and electronic market research tool to name just a few.

Impact and Reactions

The prestigious United Nations Public Service Award, numerous home and international endorsements and also first quantitative data show that Martin's officials seem to be right when portraying their project as a success. One of the clearest benefits and outputs of the project have been similarly to Sala, significantly lesser costs in the public procurement process due to introduction of electronic auctions. As of December 2011, the Martin Town Hall has since July 2009 saved 586,232 EUR which is 20% of the originally anticipated costs of procured goods and services⁹. Among other identified benefits have been increased transparency and accountability, increased public engagement in local governance, town prestige leading to more investment, and benefits to wider society (Jacko, 2009). One of the latest e-government innovations in Martin was a historic e-referendum which took place on 10 March 2012.

Quantitative data showing positive outputs of the Martin project also include the number of website visitors, citizens present at open days and the number of firms providing goods and services through public procurement. Before electronic auctions and the new rules were introduced, the town had been paying and contracting just a handful of companies (Hrnciar, 2011). The situation has significantly changed and the town's procurement database now includes more than a hundred

⁹ The figure is regularly updated, see www.transparentnemesto.sk .

firms which have during the past three years been contracted and delivered services and goods for the town. Furthermore, according to the MVK agency which conducted an opinion poll on a representative sample of 200 Martin's inhabitants in September 2010, 38.4% of Martin town inhabitants considered the project as being excellent or beneficial; 28.8% did not hear of the project; 19.7% heard of it but felt indifferent; 12.6% thought that it neither helps nor hinders; and only 0.5% of respondents considered the project as being negative (MVK, 2010; see Figure 4).

Among the benefits to wider society is the Martin's project impact on other municipalities in Slovakia. A number of municipalities followed the example set by Martin and either contacted TIS to deliver a similar scheme or decided to deliver the project themselves without the need to consult external organisations (similarly to Sala). It ought to be noted that one of the main topics of the recent November 2010 local election in Slovakia was the fight against corruption. Quoting the Martin example, a number of Slovak towns had commenced similar anti-corruption schemes before the election (e.g. Roznava, Prievidza, Ziar nad Hronom), while others have since contacted TIS for advice and cooperation and publicly announced such plans (e.g. Bratislava, Banska Bystrica, Ruzinov).

Conclusion

The paper explored and compared two successful anti-corruption local governance initiatives in the Slovak towns of Sala and Martin. Government decentralisation process which commenced in 1990 has acted as a double-edged sword. On one hand, it granted a considerable amount of freedom to local governments which could individually pass such positive governance reforms as the two presented case studies. However, on the other hand, it made corruption, nepotism and mismanagement flourish in some other, especially smaller of the 2,900 municipalities.

Both case studies showed that in order for anti-corruption measures and local governance reforms to be passed, they have to be advocated by the town executive. Interestingly, both demonstrated that even one person but with enough political power and skill can make a difference in the running of Slovak local government. Sala case study showed that bottom-up governance initiatives too can be successful to some extent, but in order to deliver a greater impact, they need to have the necessary support of the town executive or the town council. Sala's case also indicated that local elections can be won on an anti-corruption ticket and that local governments can have the capacity to deliver pioneer

governance reforms themselves without the need for external professional organisations and consultants. However, anti-corruption guru in the town's executive is a must. The case study also showed that even basic incremental changes can deliver positive local governance outputs. On the other hand, the Transparent Town project in Martin, a typical example of a top-down initiative, had not been included in the election manifesto and was initiated by an independent and previously politically inexperienced mayor a year after his election. It is an example of a professionally and externally engineered complex local governance reform which also came into fruition and delivered rapid changes and positive governance outputs. However, in this case, Martin Mayor's leadership style and personal skills played significant role during all stages of the project, including the initiation, implementation and the overall success.

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- www.transparenttown.eu Transparent Town project [English]
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Figures

Figure 1: Sala and Martin anti-corruption project compared

Town/project feature	Included in the election manifesto?	Delivery	Measures	Change
Martin	No	External	Complex	Rapid
Sala	Yes	Internal	Basic	Incremental

Source: author

Figure 2: 15 largest public procurements (2002-2006 and 2007-2010) compared

Election period	Average number of commission members	Average number of council members present	Average number of council members present from opposition
2002-2006	4.2	0.7	0.2
2007-2010	7.9	3.6	2.8

Source: Meciar, 2010

Figure 3: Town Policies Subject to Anti-Corruption Measures¹⁰

1. The policy of sale of fixed and non-fixed assets
2. The policy of rent of fixed and non-fixed assets
3. The policy of hiring new employees for the town hall and other town organizations
4. The policy of public’s participation in municipality decision making
5. The policy of access to information on how the municipality runs
6. The policy of ethics – ethical infrastructure and conflict of interests for elected town representatives
7. The policy of ethics – ethical infrastructure and conflict of interests for town employees
8. The policy of ethics – ethical infrastructure and conflict of interests for town organizations’ employees
9. The media policy
10. The policy of zoning plan and building office
11. Additional town policy
12. The policy of transparency with corporate entity founded by the

¹⁰ [sic] Original translation by the Martin Town Hall. Adopted from <http://transparenttown.eu/>.

town

13. The policy of procurement

14. The policy of concluding the Public Private Partnerships

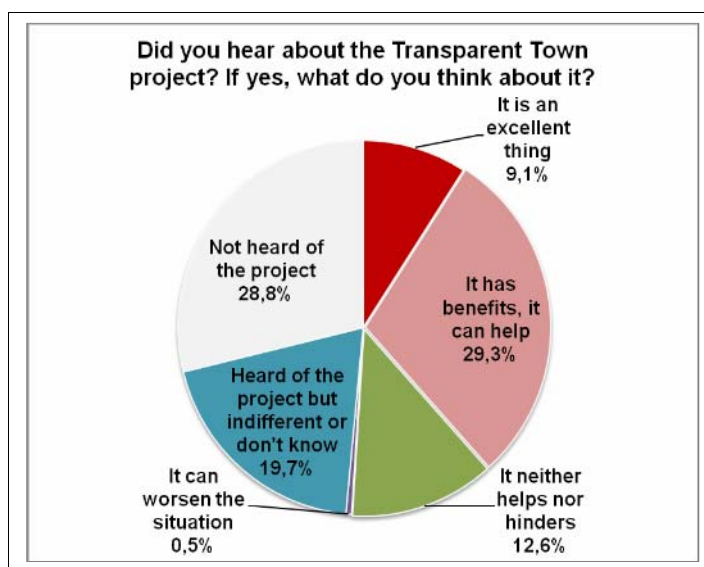
15. The policy of assigning the apartments

16. The policy of assigning rooms in social institutions of which the town is a grantor

17. The policy of preparing the budget and informing the public of the issue

Source: Martin Town Hall, 2010

Figure 4: Local Opinion on the Transparent Town Project



Source: MVK, 2010