UNIVERSITY WALLS
Analysis of transparency of the functioning of higher education institutions in Montenegro
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Podgorica, 2018
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Introduction

In the landscape of Montenegrin higher education institutions, which do not stand out on any dimension of contemporary education, the lack of transparency is an additional cause for concern, especially taking into account more visible trend of "raising walls" around universities.

So far, there were no researches of transparency of higher education institutions in Montenegro that could offer overview of these institutions’ attitude to transparency based on indicators, as well as of the availability of information on their websites, which are the main source of such information to the public.

Hence, this study has twofold objective: to offer an overview of the current state of affairs with regard to availability of information on university websites and to provide the starting point for monitoring future progress. The overall purpose is to improve the quality of education, to which transparency is essential.

Higher education institutions have the public responsibility to provide educational services, and there is no reason to keep any information about their functioning secret.
Higher Education System in Montenegro

Since 2004, Montenegro operates according to the so-called Bologna system of education, which purpose is to integrate and standardize higher education in countries signatories of this agreement. This necessarily entailed significant changes in the existing systems of education, such as additional examinations for students, introduction of new concepts such as ECTS credits\(^1\), development of new study programmes, etc. all of which should have improved the quality and shortened the duration of studies. Most higher education programmes in Montenegro follow the 3+1+1+3\(^2\) system. Exceptions from this rule are the Faculty of Economics, which follows the 4+1+3\(^3\) system, and regulated professions (medicine, dentistry, pharmacy, architecture, and teacher training programmes), whose duration is regulated separately.

Higher education in Montenegro represents one of the areas especially vulnerable to corruption. Furthermore, it is currently highly non-transparent system leaving large space for numerous abuses. The Government’s Strategy for Development of Higher Education in Montenegro 2016-2020 expresses general readiness to continue improving higher education in all priority areas such as quality, sustainable and stable financing, better alignment with the needs of the labour market, greater internationalization, strengthening of the research component of higher education, and the role of higher education in social development and creation of a more competitive and competent workforce.\(^4\)

Despite these declaratory aims, research conducted in 2016 by the Centre for Civic Education (CCE), in cooperation with Ipsos Strategic Marketing agency, showed that more than half of the citizens believe that corruption is present in the Montenegrin higher education institutions, both public and private.\(^5\) The citizens believe that corruption has permeated all levels of education, but is especially widespread in

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\(^{1}\) The European Credit Transfer and Accumulation System (ECTS) is a student-centred system based on the student workload required to achieve the objectives of a programme of study. Its aim is to facilitate the recognition of study periods undertaken by mobile students through the transfer of credits. The ECTS is based on the principle that 60 credits are equivalent to the workload of full-time student during one academic year:  [http://www.emundus.univ-montp2.fr/index.php?option=com_content&view=article&id=39:what-is-an-ects-and-what-are-ects-credit-points&catid=9:faq&Itemid=423](http://www.emundus.univ-montp2.fr/index.php?option=com_content&view=article&id=39:what-is-an-ects-and-what-are-ects-credit-points&catid=9:faq&Itemid=423)

\(^{2}\) Most programmes had the following levels of study: three years of undergraduate (bachelor) study + one year of specialization + one year of master (graduate) studies + three years of doctoral studies.

\(^{3}\) Faculty of Economics kept the previous system of four years of undergraduate (bachelor) studies + one year of master (graduate) studies + 3 years of doctoral studies.

\(^{4}\) Ministry of Education, Strategy for development of higher education in Montenegro 2016-2020, p. 3.

higher education. This suggests that the question of transparency of higher education institutions must remain a priority. When asked to identify specific situations in which corruption is most likely to take place, the largest number of respondents brought up employment procedures and faculty appointment. This finding is especially worrying because it represents an indicator of systemic corruption and should raise an alarm bells in the responsible institutions.

Greater transparency also contributes to improvements in various other areas in which Montenegro lacks quality and agency, such as: benchmarking developments of the educational system though continuous collection of data, ability of students and employers to easily comprehend the system and the way it functions, merit-based employment and promotions, and transparency of spending (especially important in the case of the University of Montenegro which is financed from the public budget). There is also the question of internal evaluations of the institutions, the purpose of which is to assess the level of performance and suggests improvements for higher education institutions, but which are not available on their websites.

The system of higher education in Montenegro consists in the main of four universities: University of Montenegro (UoM), Mediterranean University, University Donja Gorica (UDG) and Adriatic University (Univerzitet Adriatik), and three independent private faculties – Faculty of business management Bar, Faculty for Administrative and European Studies, Faculty for international management in tourism (HEC) and one independent public faculty – Faculty for Montenegrin language and literature.
The Law on Higher Education\textsuperscript{6} regulates the functioning of higher education institutions. Amendments in 2017 recognized the new system of study, and introduced free tuition at UoM, mandatory skills training of at least 25\% of total workload by subject, as well as mandatory knowledge of two foreign languages at the B2 level for the first language and A2 level for the second, definition of plagiarism, etc. Another amendment established the Agency for Quality Assurance in Higher Education, which took over most of the responsibilities of the Council for higher education. The agency, which has very broad responsibilities to regulate higher education, is subordinated to the Ministry of Education, and its director as well as the members of its Managing Board are appointed by the Government. The area is further regulated by various bylaws and documents regulating the work of individual institutions, such as the Statute, the Code of Ethics, rules of study, regulations on faculty appointments, etc.

Universities in Montenegro offer academic and vocational programmes at four levels: undergraduate, specialist, master, and doctoral studies. The existing system is a result of the reforms as well as the post-reform processes, and today the studies at UCG take place parallelly according to the old and the new, reformed, system. This means that all departments offer two parallel programmes of undergraduate studies, though students who follow the old course of studies also have the specialization year.

Overall, the higher education institutions in Montenegro have in total 47 faculties and two institutes, and offer 268 academic and 39 vocational programmes – 307 in total.\textsuperscript{7}

According to the date collected by the CCE, the number of students in higher education institutions in 2017/18 was 18 659, though University Donja Gorica, Mediterranean University, and the Faculty for Administrative and European studies failed to respond to our requests for information, which is also an indication of their attitude to transparency. Data for academic year 2018/2019 was submitted by University of Montenegro (16 550 students), Adriatic University (1 206 students), Faculty of business management (144 students), Faculty for International Management in Tourism and Hospitality (40 students) and Faculty for Montenegrin language and literature (139 students).

The average duration of studies at UoM was 4.5 to 5 years in the past three years. This information is not available for any of the private institutions.\textsuperscript{8}

Regarding finances, UoM’s income in 2017 was EUR 29.373.697,03 and expenses EUR 29.089.596,55\textsuperscript{9}. In 2018 EUR 19.357.228,10 was allocated to UoM from the state budget. UoM’s planned expenses for the same year are EUR 30.628.011,59\textsuperscript{10}.

\textsuperscript{6} The Law on Higher Education, “Official Gazette of Montenegro”, no. 44/14, 52/14, 47/15, 40/16, 42/17, 71/17 and 55/18.
\textsuperscript{7} Data from the Table of accredited higher education institutions in Montenegro from the website of the Ministry of Education, http://www.mpin.gov.me/rubrike/enic-centar/86623/18576.html
\textsuperscript{8} In 2015, the average length of studies at UCG was 4.5 years, in 2016 4.82, and in 2017 4.49. The longest average duration of studies is at the Faculty of Law (6.12 years). Source: Dnevne novine, 03/10/2018, p. 14-15. https://issuu.com/dnevne-novine/docs/988106_4_1538538059
\textsuperscript{9} Data from the Financial report of UoM for 2017, https://www.ucg.ac.me/objava/blog/6/objava/17406-izvestaj-za-2017-godinu
\textsuperscript{10} Data from the Law on the Budget of Montenegro for 2018 and the UoM’s financial plan for 2018
State Audit Institution (SAI) did not audit UoM in almost ten years: the last audit report on consolidated annual financial reports of the UoM was made in 2009. It only covered a few units and was conditionally positive. Since then, UoM received more than EUR 140 million in public money.

<table>
<thead>
<tr>
<th></th>
<th></th>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>University of Montenegro¹¹</td>
<td>29.373.697,03</td>
<td>31.825.742,90</td>
<td>30.375.782,23</td>
</tr>
<tr>
<td>Mediterranean University</td>
<td>2.261.743</td>
<td>2.436.667</td>
<td>2.201.490</td>
</tr>
<tr>
<td>University Donja Gorica</td>
<td>558.098</td>
<td>503.617</td>
<td>415.035</td>
</tr>
<tr>
<td>Adriatic University</td>
<td>6.093</td>
<td>/</td>
<td>/</td>
</tr>
<tr>
<td>Faculty for Administrative and European Studies</td>
<td>148.598</td>
<td>129.972</td>
<td>147.870</td>
</tr>
<tr>
<td>Faculty for International Management in Tourism</td>
<td>66.048</td>
<td>64.985</td>
<td>61.980</td>
</tr>
<tr>
<td>Faculty of Business Management¹²</td>
<td>776.047</td>
<td>720.792</td>
<td>644.484</td>
</tr>
</tbody>
</table>

Revenues by year and higher education institution for period 2015-2017

Financial reports of the Faculty for Montenegrin language and literature are not publicly available.

In overall, findings indicate that the Montenegrin universities are surrounded by high non-transparent walls, as can be seen from the comparison of summary indicators below:

<table>
<thead>
<tr>
<th></th>
<th>University of Montenegro</th>
<th>Mediterranean University</th>
<th>Faculty for Administrative and European Studies</th>
<th>University Donja Gorica</th>
<th>Faculty for Montenegrin language and literature</th>
<th>Adriatic University</th>
<th>Faculty for business management</th>
<th>Faculty for international management in tourism</th>
</tr>
</thead>
<tbody>
<tr>
<td>General regulation</td>
<td>3.55</td>
<td>3</td>
<td>2.32</td>
<td>1.56</td>
<td>2.4</td>
<td>1.5</td>
<td>1.5</td>
<td>1.5</td>
</tr>
<tr>
<td>Organization</td>
<td>3</td>
<td>2.2</td>
<td>2</td>
<td>1.93</td>
<td>1.3</td>
<td>2.2</td>
<td>1.3</td>
<td>1.3</td>
</tr>
<tr>
<td>Study programmes and research centres</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>2.67</td>
<td>3</td>
<td>2.8</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>Information about employees</td>
<td>3</td>
<td>3</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>4</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Projects and publications</td>
<td>4</td>
<td>4</td>
<td>3</td>
<td>3.33</td>
<td>2.67</td>
<td>2.3</td>
<td>1</td>
<td>1.24</td>
</tr>
<tr>
<td>Repositories</td>
<td>3</td>
<td>1</td>
<td>13</td>
<td>1</td>
<td>3</td>
<td>17</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Sources of financing</td>
<td>2.58</td>
<td>/</td>
<td>/</td>
<td>/</td>
<td>1.5</td>
<td>/</td>
<td>/</td>
<td>/</td>
</tr>
<tr>
<td>Student issues</td>
<td>3.25</td>
<td>3.21</td>
<td>2.33</td>
<td>3.25</td>
<td>2.25</td>
<td>2.4</td>
<td>2.37</td>
<td>1.78</td>
</tr>
<tr>
<td>TOTAL</td>
<td>3.17</td>
<td>2.77</td>
<td>2.56</td>
<td>2.52</td>
<td>2.52</td>
<td>2.41</td>
<td>1.74</td>
<td>1.43</td>
</tr>
</tbody>
</table>

Average scores for each higher education institution by research area

These summary indicators point to various shortcomings of the system with regard to accessibility of the general regulatory documents, organisation and existence of repository of students’ work. They also highlight some positive examples, such as

¹¹ Data from the UoM’s financial reports, [link](https://www.ucg.ac.me/objava/blog/6/objava/66-finansijski-izvjestaj)

¹² Data on the revenues of all private higher education institution from the TAXIS website of the Tax Administration
UDG with regard to information about employees and UCG with regard to projects and publications, it should be noted that the CCE did not verify the information, but only checked for its availability. Even so, the total average score of all institutions would be 2.39, or in school terms sufficient. This may be enough for a pass, but it is definitely not enough to improve the quality and effectiveness of these institutions. Ministry of Education, as well as the newly established Agency for Quality Assurance in Higher Education ought to pay more attention to the problem of transparency, especially of those institutions whose work is partly financed from the Budget of Montenegro.
Methodology

The methodology for this study consisted of checking the availability of key information on the websites of higher education institutions. Availability of this information was checked against a list of specific types of information that ought to be pro-actively published by all higher education institutions.

The research assessed availability of information in eight priority area: 1) general regulation, i.e. availability of key regulatory documents, 2) organisation of the higher education institutions and the functioning of each body within this system, 3) study programmes and research centres, 4) information about employees, 5) projects and publications, 6) repositoria of students’ theses, 7) financing, and 8) student services. Additional information was acquired where necessary via requests for free access to education.

Under **general regulation**, the minimum of documents of general relevance that should be publicly available to all interested parties was identified for the purpose of this research. These are legally prescribed basic documents that ought to be published on the website of UCG, such as strategies, laws, public registries, guides for free access to information, publicly released information, annual reports, and other individual documents. CCE’s researchers made sure not to include documents that are not applicable to a given higher education institutions, as the legal requirements vary according to the type of institution. In other words, only those documents that the institution in question ought to have on its website were checked.

<table>
<thead>
<tr>
<th>Name of the institution</th>
<th>Number of documents expected</th>
</tr>
</thead>
<tbody>
<tr>
<td>University of Montenegro</td>
<td>47</td>
</tr>
<tr>
<td>Mediterranean University</td>
<td>36</td>
</tr>
<tr>
<td>University Donja Gorica</td>
<td>36</td>
</tr>
<tr>
<td>Adriatic University</td>
<td>35</td>
</tr>
<tr>
<td>Faculty for Administrative and European Studies</td>
<td>22</td>
</tr>
<tr>
<td>Faculty for International Management in Tourism</td>
<td>20</td>
</tr>
<tr>
<td>Faculty of Business Management</td>
<td>20</td>
</tr>
<tr>
<td>Faculty for Montenegrin language and literature</td>
<td>21</td>
</tr>
</tbody>
</table>

**Number of documents expected by surveyed institution**

**Private higher education institutions** are not subject to the Law on Free Access to Information\(^{13}\), which means that they are not expected to publish the same information as UCG, according to the Agency for free access to information and personal data.

\(^{13}\) Law on Free Access to Information, *Official Gazette of Montenegro*, no. 044/12 and 030/17
protection. However, higher education institutions have the **public mandate to conduct activities of public interest**, which is why the CCE finds problematic the Agency’s decision to exempt these institutions from the Law on Free Access to Information.

*Excerpt from Decision no. UP II 07-30-354-2/17, Agency for personal data protection and free access to information, which maintains that the private Faculty of management Herceg Novi is not subject to the Law on Free Access to Information*

Article 12 of the Law on Free Access to Information stipulates that public authorities\(^\text{14}\) are responsible to proactively (within 15 days from their adoption) publish: 1) guide to free access to information; 2) public registries and databases; 3) work plans and programmes; 4) reports and other documents on their performance and the situation in their area of activity; b) drafts, proposals, and final versions of strategies and plans for their implementation; 6) draft proposals for laws and other regulations, and expert opinions on these proposals; 7) individual acts and contracts concerning the use of money from public funds or revenues from public property; 8) a list of public employees and their job descriptions; 9) a list of civil servants and the calculations of their salaries and compensations for carrying out

\(^{14}\) Article 9. of the Law on Free Access to Information: A public authority is any public body (legislative, executive, judicial, or administrative), a body of local government, local government, an institution, enterprise or other legal person founded by the state or local administration, a legal entity whose work is to a large extent financed from the public budget, as well as private individuals, entrepreneurs, or legal persons in charge of executing a public mandate or managing a public fund.
the public function; 10) decisions and other individual acts that may affect the rights, responsibilities, and interests of third persons; 11) information that has been made public upon request for information.

**Organisation of the higher education institution** includes, for the purposes of this research, information on the constitutive bodies of the institution, system of organisation, and key information about persons in management positions. This includes information about the rectors’ college, senate, or other governing bodies. For universities, this also includes information about faculty units as well as other centres that might exist within the main institution. It is our belief that such information ought to be available and easily accessible, as students must have information on who to address if they encounter problems in the course of their studies, and the public must know who is in charge of which institution.

**Study programmes and research centres** is the sub-title in the chapter on UCG; for other higher education institutions, due to the way these are organised, the title is simply **study programmes**. This includes a list of study programmes with descriptions and information about each, ECTS catalogues and learning outcomes. For UCG, it also includes information about centres within UCG, their composition, information about their work, and the adopted documents such as opinions, decisions, etc.

The question of **employment** and promotion at UCG is frequently raised in the context of doubts about the regularity and implementation of procedures. Moreover, the procedures at private higher education institutions are not harmonized, and the availability varies from one institution to another. CCE’s research on corruption in higher education\(^\text{15}\) showed that as many as 52% of the respondents believed corruption to be present during recruitment or appointment of faculty positions. Our own study focused primarily at the technical side of this problem, availability of information about faculty members, their contacts, and detailed biographies.

**Projects and publications** concern the outcomes of the institutions’ work, and measure how proactive they are in mobilizing resources for research and teaching improvements. The data reflects the existence of a sub-page for publications, the availability of these publications, information about projects, etc.

**Existence of a repositories** of students’ theses is one of the ways of preventing and detecting plagiarism, but also a reflection of the (lack of) will of HEI’s managers to be fully open about their work, and especially about the work that is written as a result of their teaching. This means that a database of undergraduate, master, and doctoral theses must be publicly available in its entirety. The practice, overall, unfortunately remains at a fairly low level.

**Financing** could only be studied in relation to UCG and the Faculty for Montenegrin Language and Literature, the two HEI financed from the public budget. Unfortunately, it is not easy to understand clearly how the money received from the state is being spent. UCG’s website contains only the consolidated financial reports, not useful for deeper analysis. FMLL, does not even have that. This section contains, among other, public procurement, financial end-of-year reports, contracts, etc.

**Student services** encompass a fairly broad range of issues. For the purposes of this research,\(^\text{15}\) CCE’s study of corruption in education, 2016. [http://media.cgo-cce.org/2016/01/the-public-opinion-research.pdf](http://media.cgo-cce.org/2016/01/the-public-opinion-research.pdf)
this is limited to the existence of information booklets, academic calendars, information about student organisations, general announcements such as information about exams, results, enrolment, conditions of study, information about the average length of studies, average grades, and the number of students by institution.

All areas covered by the research were then graded on a scale of one to five, with one the lowest, and five the highest grade in terms of transparency of the higher education institution.

Three parameters were used to construct the score:

- Existence of information/document
- Completeness of information/document
- The format in which the information is presented.

All documents or groups of documents were assessed individually, in line with the set parameters. The score in each area is the average of scores for each document surveyed under this area.

Based on the above, the institutions were graded according to the following scale:

- Score 1 – There is no information/document available;
- Score 2 – A document or a group of documents is partly available but not in a machine-readable format, which weakens their later usability.
- Score 3 – A document or a group of documents are partly available, in a machine-readable format and can be found through direct engine search;
- Score 4 – A document or a group of documents are fully available but not in a machine-readable format, which weakens their later usability.
- Score 5 – A document or a group of documents are fully available in a machine-readable format.

Due to the specificity of its position, a special chapter was dedicated to the UCG, though all other institutions have also been analysed in detail.

Regarding terminology, by the institution’s website we mean the unique website of the institution, e.g. the website of University Donja Gorica, though this does not preclude research on the individual faculty websites. Direct search refers to the process of seeking a document or a group of documents via search engine, without first having to access the website of the institution.

The study is organised around research areas and offers a comprehensive overview of the collected information for each institution separately, and for each area. The aim was to offer a clear insight into the current situation, point to the shortcomings, and formulate recommendations for improvement. For this reason, we believe that this study could set the benchmark for further research in this area, and be a warming to all higher education institutions which are currently failing the transparency challenge.

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16 By full information we mean information published in a timely manner (within 15 days of adoption), in its entirety, and which is identical to the title under which it is published. All other information is considered incomplete.

17 Open data format means that information published on the website is legible in electronic form.
As the oldest and the state university, with convincingly the largest number of students and budget in relation to all higher education institutions, UoM could be a model when it comes to abundance and content of available data on its website. UoM adopts its annual report on work on session of Management Board, in which five representatives of founders are also seated\(^\text{18}\), which means that the Government has mechanisms to monitor the work and manner of expenditure at UoM, but also responsibility to timely react in case of irregularities.

With the appointment of Radmila Vojvodic to the position of Rector, in the first phase of her first term of office\(^\text{19}\), Management at UoM begins implementing certain activities that could lead to reduction of risks from corruption and other forms of abuses. For example, as per initiative of the Centre for Civic Education (CCE), the checks of double work-engagements of professors from UoM working at faculties in the region without UoM’s permission and in some cases contrary to existing legislative framework have begun. Also, at that moment, the *Analysis of Condition and Strategic Goals for Re-Organisation and Integration of University of Montenegro*\(^\text{20}\) was produced, a document which gives, albeit unusual for Montenegrin institutions, an open overview of situation at UoM via various aspects. This document was, in its manner, used by the same management as a basis for new and swift reform, whose effects are presented in the report *Reforming of the Reform*\(^\text{21}\). UoM came out of this reform with changed study programmes for which the management claimed to be better

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\(^{18}\) Representatives of Government of Montenegro

\(^{19}\) Radmila Vojvodic was elected firstly for Rector in August 2014, and she begun the second term of office in 2017, only to be dismissed by the Management Board in October 2017.

\(^{20}\) *Analysis of Condition and Strategic Goals for Re-Organisation and Integration of University of Montenegro*, UoM and European University Association (EUA), 2015, [https://www.ucg.ac.me/skladiste/blog_4/objava_40/fajlov/UCG%20Analiza%20stanja.pdf](https://www.ucg.ac.me/skladiste/blog_4/objava_40/fajlov/UCG%20Analiza%20stanja.pdf)

adapted to other European systems. However, the entire process was marked with plenty of controversies, absence of transparency and inclusiveness, which resulted also in protests of some faculty units. However, in overall, the academic community itself, with few exceptions, did not show sufficient proactivity in the process of work on reform and protection of its rights, i.e. the critical voices were ‘muted’ in various manners, therefore the introduction of new system of work in situation of subdued resistances was performed rather quickly. For example, the Rector prevented a man dissenting her to be elected for a dean of Faculty of Science and Mathematics (FSM), by factually abusing her position, via assessment that the candidate for dean of FSM is ineligible to perform the function of dean because the cooperation during reform at UoM with him was ‘non-constructive and out of academic spirit’.\(^{22}\) This was one of the modes of marginalizing or erasing a different opinion, without argumentative discussion with those representatives of academic community who were against reform which was envisaged and ultimately implemented in such manner.

Finally, it should be noted that the entire process of reform, besides the promptness, was characterised also by illegality, since the licensing and accreditation of this institution were performed according to old system. Namely, accreditation and licensing of new programmes should have been done in accordance with the Law on Higher Education, which was also, due to this reform at UoM, in the process of amendments. However, the fact remains that accreditation of new programmes of UoM was confirmed by the Council for Higher Education in May 2017\(^{23}\), and the amendments to the Law on Higher Education were adopted in the Parliament in June 2017, while the Law entered into force by the day it was published in the ‘Official Gazette of MNE’ on 30 June 2017.

**General acts**

Of the total of 47 documents which were subject of research and which should be available on website of UoM, 40 documents are available, while seven documents cannot be found on website. One of these seven documents which are not on website of UoM represents documentation on accreditation and license of UoM. Majority of other higher education institutions in Montenegro have rendered these documents public, while UoM is withholding this information.

The UoM website has been changed twice since 2015, but these changes did not lead to more concrete improvements in the part of data availability. The UoM website has the applicable Law on Higher Education, the Strategy on Development Higher Education in Montenegro (2016-2020), bulletins, the Code of Ethics, etc. which is not the case with most other institutions of higher education although these documents

\(^{22}\) Opinion of Rector on candidacy of prof. Stevan Šćepanović, No. 02-2917/4-1 from 30/11/2016, submitted to Management Board of UoM.

\(^{23}\) [https://www.ucg.ac.me/objava/blog/10/objava/2217-akreditovan-univerzitet-crne-gore](https://www.ucg.ac.me/objava/blog/10/objava/2217-akreditovan-univerzitet-crne-gore)
are the basis for their work. Also, the progress in relation to earlier period consists in a number of these documents being also available in English language. This information can be found in the section Documents/Regulations. However, there are also some exceptions in some data, such as forms found in the part determined by the affiliation to the bodies to which they are supposed to be submitted.

The documents are most often in PDF format, rendering them difficult for further use. In addition, there are examples of documents that need to be directly downloaded to one’s personal computer without the possibility of prior access to content of the document. In some cases, the documents have been scanned and published, such as the Decision on compulsory archiving of doctoral dissertations in digital archive, which means that if any of the parts of that document are needed to someone, they must be typed because the file conversion programmes are not usable here.

Mark: 3.55

Organisation

UoM has separated parts on website for all bodies in its composition, but availability of data in these sections is not even. There is no organisational chart on UoM.

Rector, Vice Rectors and Secretary General of UoM comprise Rector’s Collegium. Data with their names and functions are available with biographies in the Rector’s Collegium section. Contacts are missing for two vice rectors. Additionally, at the bottom of the page there are also data on other bodies that provide professional and administrative support to the work of the Rectorate.

Management Board (MB) is a governing body of the UoM and it has a separate section on their website. However, the composition of the MB is given as a list without the contacts or biographies of the members. There are no published minutes from meetings of the MB on the website. Decisions and proposals for the agenda for sessions are available, but the most recent ones are from May 2018, hence this was not updated for six months (last checking from November 2018).

The situation is identical with the Senate in terms of contacts, biographies and list of members of this body. For the Senate, however, there are minutes from sessions, and the most recent ones are from June 2018. Materials from sessions are available in a separate section.

There are three councils on the UoM: Council for Social Sciences, Council for Natural and Technical Sciences, and Council of Arts. The composition of these councils is available, but without the contact of members or biographies. There are no materials from the sessions of these councils either.

The Court of Honour is the body in charge of resolving all complaints of violations of moral and professional principles established by the UoM’s Code of Ethics. Unfortunately, this is a highly non-transparent body. In addition to the Decision on the establishment of the Court of Honour, there are no other decisions or opinions of

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24 Suitable format for every set of data can vary. Pdf may make data easy for understanding, but not in majority readable for machine. Due to this, availability is often achieved by making the same data available in various formats [https://www.europeandataportal.eu/elearning/en/module9/#/id/co-01](https://www.europeandataportal.eu/elearning/en/module9/#/id/co-01).

25 Đurđica Perović and Irena Orović
the Court of Honour on the UoM website. The only information that can be found is
the list of members of the Court of Honour, but without the biographies or contacts
of the members, except for the contact person.

The Scientific Committee is in charge of checking the tender documents, its timeliness,
completeness and compliance with the announced competition, all in accordance
with the Criteria for election in academic and scientific titles26 and the Instructions for
election to the title27. In the separate section, only data on members of the Scientific
Committee and information about contact person are available on the website. The
opinions of the Scientific Committee are not available on the UoM website, but are
included in the report of the reviewers of candidates for the candidates who are
elected to the title in the form of a single sentence. This is usually explained as a
positive or negative opinion in the UoM Bulletin. There is a list of scientific journals
and databases of papers, but out of 16 journals from Montenegro, five links to these
journals do not work, and some, like CIVIS, have outdated data or numbers28. This
means that the list has not been updated or that during compilation of these lists,
old data with journals which are not even issued any more were used.

There are partial contacts for Services of UoM.

UoM has 19 faculty units. The latest changes to the UoM website have introduced
uniform faculty websites, rendering them clearer, easier to use and easier to compare.
On the left, there is a list of all faculty units, and this list is simultaneously a series
of active links to their individual pages. Data is mostly updated. There are contacts
of management at all faculties, while other data depend on the faculty, some are
identified by openness, while others do not recognize the importance of this principle.

Study programmes and research centres

Study programmes on the UoM website are separated as per faculty unit. By entering
the website of each single faculty, there is a separate section for Study Programmes,
which are further subdivided by study levels. ECTS catalogues are provided as part
of the subjects within study programmes.

Learning outcomes exist on the UoM website, but this category is empty. By direct search,
individual learning outcomes can be found. One example is the learning outcomes of
the Law Faculty, which can be found by direct search in the search engine. The others
are given in a form of a couple of sentences on what the students will learn during the
studies and by viewing the Faculty site itself and clicking on a particular programme.

Mark: 3

26 https://www.ucg.ac.me/skladiste/blog_6/objava_3719/fajlovi/mjerila%20akademska_zvanja.pdf
27 https://www.ucg.ac.me/objava/blog/6/objava/3719-pravila-u-vezi-izbora-u-zvanja
28 Studia Marina, Agriculture and Forestry, CIVIS (Montenegrin Journal of Political Science), Computer Science
and Information Systems, Montenegrin Medicinal Archive, Biotaxa, ETF Journal of electrical Engineering,
Folia linguistica et literaria, Historical records, Logos & Littera: Journal of Interdisciplinary Approaches
to Text, Mathematica Montisnigri, Montenegrin Journal of Sports and Science and Medicine (MJSSM),
Economic Outlook, Scripta Scientarium Naturalium, Sport Mont, Protection of material in environment:
https://www.ucg.ac.me/objava/blog/3/objava/43-naucni-casopisi
At UoM there are eight centres, plus Central University Library and Confucius Institute. Availability of data is uneven. Communication and PR centre has only contacts and biography of PR manager. The Central University Library has only a partial list of employees with the contact of the head of department, while the Technology Transfer and Professional Services Centre has neither information on employees nor contacts. Other centres give an overview of the composition, without biography of employees, and with certain contacts. Among these centres are the Centre for Doctoral Studies, which also publishes the minutes of the sessions on its website, the International Cooperation Centre that has published bilateral cooperation agreements and the Communication and PR Centre that made available the Strategy and Communication Plan for the period 2017/19. The Centre for Excellence for Research and Innovation is located in a section

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29 Centre for Excellence for Research and Innovation, Centre for Studies and Quality Control, Centre for Doctoral Studies, International Cooperation Centre, Career Centre, Centre of Information System, Communication and PR Centre and Centre for Transfer of Technology and Professional Services
dedicated to faculty units. But the UoM website dedicated to this centre is empty, leaving only the decision on establishment of a special organisational unit available.  

Employees
Data on engaged academic staff are the only ones available as per individual faculty units on which they are engaged, although there is separate section on website of UoM which is empty. Available data on engaged staff are not complete, thus there can be found names of professors without biographies and contact information. Available biographies are mostly crude and often do not contain, for example, the research area, besides list of papers and not even always the list of papers either.

Projects and publications
Current and previous project data are included in the Projects section in the form of list of projects, but the most recent one is from 2016. However, in the part of the International Cooperation Centre there is a list of faculty units, which is available. The list looks updated but has no links to specific projects that would give more information about the same or the results of those projects.

Mobility programmes are presented in the part of the website for International Cooperation Centre. In the part of Scholarships and Mobility there is information on mobility programmes, information relevant to foreign students in English, information on active vacancies and short stories of professors about the programmes. This part of the website is not comprehensive, so additional effort is needed in order to collect data, and a section related to staff within mobility is empty.

31 Data should be situated under the Engaged staff, but that part is empty https://www.ucg.ac.me/objava/blog/12/objava/2-angazovano-osoblje
32 https://www.ucg.ac.me/objava/blog/19379/objava/6449-medunarodni-projekti-na-univerzitetu-crne-gore
33 https://www.ucg.ac.me/objava/org/O/poz/mobilnost
Information on publications that are the product of UoM’s activities are contained in the Central University Library section, which contains only a list of publications. There are links to all libraries in all faculties, and a list of newly added publications. All UoM’s content can be viewed via COBISS database.  

**Repository**

The issue of compulsory archiving of all master and doctoral theses at UoM has been ignored for a long time, and there were no data or documents of this type on the UoM website. Now, through the Phaidra website, there are indications that this situation has improved somewhat. Specifically, a number of doctoral theses and post-doctoral papers of UoM students can be searched, as per faculty or the names of authors.

The list of scientific papers is also available in Montenegrin and English language, with an advanced manner of searching for papers, but complete papers are still missing when search is performed. This search is also intended as the search of doctoral and master theses, since the catalogue of master papers at UoM is still empty. Scientific papers that are even available by name do not have the link or the possibility to be downloaded. According to these data, UoM has so far published 2517 papers on SCI, SCIE, SSCI, A & HCI lists and 516 on the SCOPUS list, while there are large differences in the number of papers between faculty units.

![Print screen of number of scientific papers as per faculty](image)

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35 Link for portal Phaidra, [http://eteze.ucg.ac.me/application/browse](http://eteze.ucg.ac.me/application/browse)
36 [https://www.ucg.ac.me/lista_radova](https://www.ucg.ac.me/lista_radova)
Finances
UoM is in significant part being financed from the Budget of Montenegro. These allocations have been on the rise for the past three years, but the biggest increase was for 2018, when a part of the budgetary allocation was raised by two million Euros, i.e. € 19,357,228.10 was allocated, and the planned UoM revenue for 2018 amounts to 30,628,011.59 Euros37.

<table>
<thead>
<tr>
<th>Year</th>
<th>Transfer of budgetary means for UoM in EUR</th>
<th>Total revenue of UoM in EUR</th>
<th>Total expenditure of UoM in EUR</th>
</tr>
</thead>
<tbody>
<tr>
<td>2017</td>
<td>17,357,228.10</td>
<td>29,373,697.03</td>
<td>29,089,596.55</td>
</tr>
<tr>
<td>2016</td>
<td>16,857,228.10</td>
<td>31,825,742.90</td>
<td>29,255,643.73</td>
</tr>
<tr>
<td>2015</td>
<td>15,426,121.00</td>
<td>30,375,782.23</td>
<td>30,040,344.07</td>
</tr>
<tr>
<td>2014</td>
<td>15,909,235.96</td>
<td>31,474,088.03</td>
<td>31,580,828.74</td>
</tr>
<tr>
<td>2013</td>
<td>12,259,999.89</td>
<td>30,085,338.42</td>
<td>29,589,577.90</td>
</tr>
</tbody>
</table>

Overview of total revenues and expenditures of UoM with allocation from Budget of Montenegro, for period 2013-201738

While processing available materials and information on the websites of higher education institutions, different practices, reporting methods, and levels of available data were identified. UoM had certain data on finances in that part, that were not available on other institutions because there is no legal obligation to make this information available to the public except on the website of Department of Public Revenues.

From the documents pertaining to the financial issue, the consolidated financial plans and reports are duly published for the period from 2009 to 2018 for the plans, and by 2017 for the annual report. There is one external evaluation report - the IEP report 39 but there is no comment on the financial management of the UoM, and no internal audit reports are available even though it has been implemented at certain intervals as per data available to CCE. The UoM regularly posts data according to the obligations of the applicable laws, so these data are available for 2016 and 2018, but the documents are scanned in such manner that their further electronic use is limited.

When it comes to UoM’s contracts, this part of website has outdated information. For example, public procurement contracts are from 2008 and 2011; construction contracts from 2004, 2006, 2007 and 2015; contracts for construction of parking spaces from 2007; project-planning contracts from 2006 and 2007; supply contracts from 2005, 2007, 2008 and 2009; loan contracts from 2010, 2011 and 2012. Available contracts are in the Contracts section, and all are scanned thus their further use is hampered.

This part of the website should be far more transparent and should contain all necessary information, precisely because of the manner of UoM financing and the consequent accountability to citizens.

37 Data taken from Law on the Budget of Montenegro for 2018 and Finance Plan of UoM for 2018.
* Public procurement
The data available on the UoM’s website are from 2011 for public procurement plans, from 2012 for tenders, from 2013 for certain contracts and for low value acquisitions from 2017, and the annual reports are from 2011. Public procurement data is now available through the central Public Procurement Portal of Government of Montenegro but CCE has not, in the case of UoM, and for the purpose of this report, analysed their completeness or up-to-datedness. 40

Mark: 2.58

Student issues
Students, as the ultimate beneficiaries of higher education institutions’ services, are those who should have easier access to information of importance, as this also affects the quality of their studies. UoM has published an updated academic calendar and student information-booklet on the website.

There are no data on issued diplomas, number of students, or average pass-rate and duration of studies, which could be posted in the part intended for students. Information about lectures and other useful notices, such as scorecards or access to results of the exams, is available on websites of faculties and vary among the faculty units.

Study conditions are given through basic information and general explanations in the section Studies. This website segment is divided as per study level. However, except in the part of basic studies, where there is only information on competitions, at other levels of studies there are no data, that is, those sections are empty.

Student organisations and the work of the Student Parliament and the Student Ombudsman are separated, with links to relevant pages and basic information about organisations and contacts. On the UoM’s page, in the section Documents, those which regulate the work of the Student Parliament, such as the Statute of the Student Parliament of the UoM 41 are published, but not the decisions and other materials from their current work.

Mark: 3.25

Average mark of UoM: 3.17

*MEDITERRANEAN UNIVERSITY*

Rector: prof. Radislav Jovović PhD, Acting
Address: Str. Josipa Broza NN, 81 000 Podgorica
Web page: http://unimediteran.net/index.php/mne/

Mediterranean University is the oldest private university in Montenegro founded in 2006. It has six faculties in its composition: Faculty of Law, Faculty of Tourism, Faculty of Foreign Languages, Faculty of Business Studies, Faculty of Information Technologies, Faculty of Visual Arts.

41 https://www.ucg.ac.me/skladiste/blog_6/objava_3716/fajlov/Statut%20Studentskog%20parlamenta%20Univerziteta%20Crne%20Gore%2025.12
General acts
There is a limited number of documents available on the website of the Mediterranean University, i.e. of 36 documents, 14 are available. Data on accreditation and issued license, the Statute, bulletins and certain rulebooks are available on the website. More documents can be found on separate websites of faculties. On the websites of individual faculties there are certain rulebooks, such as the rules of procedure for election to academic and scientific titles and accompanying criteria, rules on students’ mobility, production of master papers, conditions on criteria and enrolment procedure for the first year of study, information on international cooperation. On the website of the Mediterranean University, there is no Law on Higher Education and a part of other general documents regulating their manner of work as well.

Organisation
There are no precise data on the manner of organisation of work on the website. A list of members of the Rector’s Collegium with biographies in the form of a CV containing their contacts is published, but there is no organisational chart or any more specific explanation of how this institution works.

Regarding the governing bodies, there are data on the Assembly of Founders, but only the name of the president is published. The Senate is presented in the form of a description of the field of action and activities that it deals with, without specifying the names of members and minutes from the sessions.

List of faculties with contacts is available on the website. Separately on each faculty’s website there are contacts and names of heads.

Study programmes
In the part of the Mediterranean University website which is designated for individual faculty units, there are lists of study programmes, with databases on structure and content of study programmes and brochures of learning outcomes. However, these data are not in open data format, rendering them less usable.

Employees
There is no list of academic staff at the website of Mediterranean University. Nevertheless, biographies of professors and lecturers are on websites of the faculties where they teach. Academic staff contacts, or as they are labelled on website - teachers, can be found by opening the CV of professor in which there are also their e-mail addresses.

Projects and publications
The practice of most higher education institutions is to publish lists on websites of separate faculty units in the form of review of active and completed projects. The Mediterranean University has published the implemented projects and they are in the part of international cooperation. Mobility programmes have been rendered transparent, and can be found on website. If there is
no concrete information about the programme, then there are referring links. Also, publications that have emerged as a product of the Mediterranean University are available on website.

**Repository**
The Mediterranean University has no separate repository of master, doctoral and scientific papers. There is no mode to search the papers.

**Student issues**
The academic calendar is available on the website of the Mediterranean University, and there are separate information-booklets on separate faculty units. Mediterranean University does not have publicly available records of issued diplomas and diploma supplements, information on number of students, average pass-rate and duration of studies. Information on lectures and other information of special importance to students, as well as access to score lists, exist. The study conditions and the list of students’ organisations exist in the sections intended for that purpose on separate faculties.

**Average mark of the Mediterranean University:** 2.77

**UNIVERSITY OF DONJA GORICA (UDG)**

**Rector:** prof. Veselin Vukotić PhD  
**Address:** Donja Gorica NN, 81 000 Podgorica  
**Web stranica:** [https://www.udg.edu.me](https://www.udg.edu.me)

The University of Donja Gorica was founded in 2007, making it the second oldest private university in Montenegro. UDG has 11 faculty units in its composition and one centre: Faculty of International Economics, Finance and Business; Faculty of Information Systems and Technologies; Polytechnics; Faculty of Law; Humanistic Studies: diplomacy, security and communicology and media; Faculty of Arts; Faculty for Food Technology, Food Safety and Ecology; Faculty of Sports Management; Faculty of Design and Multimedia; Faculty for Culture and Tourism; Faculty of Philology, and UDG Centre for Foreign Languages.

**General acts**
UDG does not have majority of general acts on website, and some of information required by this research can be found separately on websites of faculties in composition. However, in addition, documents or groups of documents available on the official UDG website refer to the code of conduct, documentation on accreditation and license, the rules of election procedure to titles, criteria and enrolment procedures for the first year, and so on. On the UDG website there is no Statute of this institution, the Law on Higher Education or the Code of Ethics. Of total of 36 documents or group of documents for which it was checked whether they exist on the UDG website, only nine were identified, of which as much as seven can be found only by direct search.

Mark: 4

Mark: 1

Mark: 3.21

Mark: 1.56
**Organisation**
The UDG does not have an organisational chart of the institution as a separate document. A list of members of the Rector’s Collegium is available but without contacts or biographies. Data on members of the Assembly of Founders are not public, except the name of the President of the Assembly and a brief description of the work performed by the Senate. On the website, in the drop-down menu, there is a list of all faculty units in their composition, but there are no websites for Faculty of Sports Management, Faculty for Culture and Tourism and the Faculty of Philology. Contacts of most other faculties are available, with names of deans, of those faculties that have separate pages.

Mark: 1.83

**Study programmes**
The list of study programmes and ECTS catalogues are available on websites of faculties, but there is no available data on learning outcomes.

Mark: 2.67

**Employees**
At the UDG page, there is also a separate section dedicated to professors who are engaged in teaching. The list is presented interactively, offering the possibility of contacting the professor through the e-mail, by clicking on the name and with an insight into his or her biography, which can be very detailed for visiting professors and somewhat more general for lecturers from Montenegro.

Mark: 4

**Projects and publications**
The list of current and completed projects, as well as particular publications exist on websites of separate faculty units. Data on mobility programmes are available.

Mark: 3.33

**Repository**
UDG has no separate repository of master, doctoral and scientific papers or list of papers occurred as result of University’s work. There is no mode of search for papers.

Mark: 1

**Student issues**
Student issues and information of special importance for students can be found on website of this institution. UDG has published academic calendar, information on lectures, enrolment, obligations of students, study conditions and study organisations. As in case of UoM and Mediterranean University, there is no information of average pass-rate, average duration of studies, nor records on issued diplomas on the website.

Mark: 3.25

**Average mark of University Donja Gorica: 2.52**
Adriatic University was founded in 2017 and represents the youngest university in Montenegro. It is comprised of six faculty units, which have functioned as separate faculties until 2017, whereby Faculty for Mediterranean and Business Studies Ulcinj is directly connected to the same-named faculty in Tivat. These faculties are: Maritime Faculty Bar; Faculty for Business and Tourism; Faculty for Mediterranean and Business Studies Tivat; Faculty for Mediterranean and Business Studies Ulcinj; Faculty for Management Herceg Novi; Faculty for Traffic, Communications and Logistics Budva. This University is characterised by distinctive independence of faculties in its composition to govern their work themselves, as it was the case prior to establishment of Adriatic University.

General acts
(Non)availability of general acts on website of Adriatic University points out that transparency is not positioned highly on list of priorities by the management of this institution. Namely, data on website of Adriatic University are far more limited in relation to website of faculties in its composition. This is, possibly, consequence of internal relations of faculties that have subsequently joined into a unique joint higher education institution, but they still persist on independency. Of 36 documents or group of documents that have been searched, 31 are omitted on website of Adriatic University, i.e. only five of them are available.

All faculties in composition of this institution have made public the data on accreditation and issued license. Other data are not unified. For example, Faculty for Management Herceg Novi has published rules of studying about basic and post-graduate studies; Faculty for Traffic, Communications and Logistics Budva has published rules for election to titles, conditions and criteria for election to titles and list of agreements with other universities and faculties in the region and the world; Faculty for Mediterranean and Business Studies Tivat has published rules of production of master papers.

Mark: 1.5

Organisation
It is not possible to determine organisational structure of Adriatic University by mere insight into website of this institution. Data are available on websites of separate faculties, but their number and informativeness are limited.

There are no data on website about Rector’s Collegium nor data on other managerial bodies, besides the name of President of Assembly of Founders. The name of President of Senate is available, but not members of Senate. Organisational chart is not published, and there is only list of faculties in composition with referring links and contacts of faculties.

Mark: 2.2

Study programmes
The list of study programmes is available on websites of all faculties. ECTS catalogues are not
available only on two faculties, on which there is separate section, but without possibility to check the data. Learning outcomes are available only on Faculty for Traffic, Communications and Logistics Budva, in the form of general learning outcomes, but no concrete catalogue.

Mark: 2.8

Employees
Data on persons engaged on this institution are available on websites of faculties. This means that each individual website possesses data with list of academic staff, biographies of lecturers and contact information. However, quality of this data varies from faculty to faculty, thus, some have more detailed biographies, others have general ones and insufficiently informative, while some do not exist.

Mark: 4

Projects and publications
Besides Faculty for Mediterranean and Business Studies Tivat, other faculties of Adriatic University do not have data about projects that they have conducted on website. Maritime Faculty Bar, Faculty for Mediterranean and Business Studies Tivat, Faculty for Mediterranean and Business Studies Ulcinj and Faculty for Traffic, Communications and Logistics Budva have information on issued publications on website.

Mark: 2.3

Repository
Adriatic University is characterised by unevenness in transparency of work of faculties in its composition when it comes to existence i.e. non-existence of repository. Namely, Faculty for Mediterranean and Business Studies Tivat has published list of scientific papers, catalogue of master theses, but also specialist papers, which are easy for search. These papers are available by clicking on marked topic of paper, which opens the concrete document.
Faculty for Business and Tourism in the section notices, publishes information about persons who have acquired master degree such as University of Montenegro.

Notifications on defended and papers due to be defended on Faculty for Business and Tourism and UoM

Student issues
Student issues are regulated in accordance with rules that apply on separate faculty units, therefore this part will be described in that context.

Maritime Faculty Bar has notifications for students and basic information on study conditions published on its page.

Faculty for Business and Tourism has academic calendar, notifications for students and basic information on study conditions published.

Faculty for Mediterranean and Business Studies Tivat has some sort of records on issued diplomas, which could be seen through list of defended master and specialist papers. Notifications for students are available as well as for alumni student organisations. Faculty for Mediterranean and Business Studies Ulcinj is using the same website.

Faculty for Management Herceg Novi has made public the notifications for students and basic information on study conditions as well as data on student organisations.

Faculty for Traffic, Communications and Logistics Budva has published data on student organisations and basic information on study conditions.

Average mark of Adriatic University: 2.41
Faculty of Administrative and European Studies (FAES)

Dekan: prof. Đorđije Blažić PhD
Address: Str. Vaka Đurovića NN 81 000 Podgorica
Web page: http://www.fdes.me

Faculty of Administrative and European Studies is founded in 2005 via public-private partnership. FAES is independent private faculty conducting accredited and licensed graduate and post-graduate programmes.

General acts
FAES has published 10 of 22 documents or group of documents on its website. These are the Statute of FAES, documentation on accreditation and licensing, rules of study in graduate and post-graduate studies, rules on conditions, criteria and enrolment procedure for the first year of studies, rules on production of master papers, rules on internal organisation and systematization, and general information on international cooperation. These documents or groups of documents are only part of what should be on the site, and the documents are not in open data formats.

Organisation
Information about dean and general information are available on website. There are no data on members of governing bodies and the Senate, which is comprised of all professors of faculty, and whose names and biographies are available in the category Staff. The manner of organisation is given in the form of an explanation rather than an organisational chart.

Study programmes
A list of study programmes is available on the FAES page, ECTS catalogues, but without learning outcomes, with data on structure and content of study programmes. Learning outcomes are not available on website, but there are learning objectives for subjects.

Employees
A list of academic staff exists on website, with biographies of individual professors. This segment of the website is easy to search, thus CVs of professors can be downloaded, with contacts that are in the CV form, but the up-to-datedness of the same is disputable.

Projects and publications
Data on publications which are product of work of FAES are situated at the bottom on page. Mobility programmes cannot be found on website.

43 Founders of FAES are Capital City Podgorica, Faculty for Administration and European Studies from Kranj (Slovenia), Agency for Local Democracy and Partnership from Podgorica, as well as two persons from Italy and Slovenia, as given on official page of faculty. http://www.fdes.me/basic-information/?lang=en
Repository
FAES has no repository of papers that are defended on this institution and scientific papers of staff. There are only announcements of master papers on the section Events. \[44\] Mark: 1.3

Student issues
Information on lectures and other notifications, conditions of study, list of student organisations and practices are published on the website, while other issues, such as records on issued diplomas, information on number of students or information-booklet, are not covered by notifications on the website. FAES has eight so-called extra-study programmes with the necessary data. Mark: 2.33

Average mark of Faculty for Administration and European Studies: 2.56

Faculty for International Management in Tourism (HEC)
Dean: Marijana Mitrović Mijatović
Address: Jadranski put NN, 85 315 Miločer
Web page: http://www.hecmontenegro.com/edukacija/

HEC is a private faculty founded in 2014 in Miločer, in Budva, within the hotel HER Residence Montenegro. The implementation of the education programme it performs is in line with the reform of education through which higher education has passed in Montenegro in the part of compulsory practical work of students as an integral part of their higher education.

General acts
Of the total of 20 requested documents or group of documents, only partially available is information on international cooperation. Otherwise, the page is completely devoted to notifications, without documents that regulate certain general issues. Mark: 1

Organisation
Information on organisation, governing bodies, Senate etc. do not exist on website of HEC. Mark: 1

Study programmes
Website has available data on study programmes and ECTS catalogues, but learning outcomes are not available. Mark: 3

Employees
There is no list of employees or their contacts, besides general contact of the faculty. Mark: 1

\[44\] Website of Faculty for Administration and European Studies, http://www.fdes.me/dogadaji/
Projects and publications
There is no data on projects conducted or publications issued. The only mobility programme that is possible to find on HEC website is CEEPUS.

Mark: 1.24

Repository
HEC has no repository of papers that are defended on this institution.

Mark: 1

Student issues
Besides study conditions, other information is not available.

Mark: 1.78

Average mark of Faculty for International Management in Tourism: 1.43

Faculty for Business Management
Dean: PhD Milenko Radoman
Address: Str. Maršala Tita, 85 000 Bar
Web page: http://www.fpm.me

Faculty for Business Management was founded in 2005 in Bar and performs basic and specialist study programmes in the area of management.

General acts
Documentation on license and accreditation are the only documents or groups of documents that are published on this institutions' website.

Mark: 1.5

Organisation
This is the only higher education institution which has published the organisational chart of institution. Data on dean is available with contacts and biography, but there is no information on members of bodies.

Mark: 1.33

Study programmes
Data on study programmes and ECTS catalogues are available on website, but data on learning outcomes are not available.

Mark: 3

Employees
Data on teaching staff are limited to list of employees without any biographies or contacts.

Mark: 2

Projects and publications
There is no information on conducted or active projects, nor of published publications.

Mark: 1

Repository
This institution does not have its own repository of defended papers or scientific
papers of academic staff.

Mark: 1

**Student issues**
Data on study conditions and class-schedule are available. Information on exams and score lists are also available.

Mark: 2.37

**Prosječna ocjena Fakulteta za poslovni menadžment: 1,74**

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**Faculty for Montenegrin Language and Literature (FMLL)**

*Dean:* Adnan Čirgić  
*Address:* Vladike Petra I NN, 81 250 Cetinje  
*Web page:* [http://www.fcjk.me](http://www.fcjk.me)

FMLL is the only independent faculty founded directly by the Government of Montenegro in 2014. This decision of the Government was followed also by public discussion considering that at that moment existed, and still exists, Department for Montenegrin Language at UoM within Faculty of Philosophy of University of Montenegro, which is in the composition of the newly established Faculty of Philology since 2015.

**General acts**
FMLL has published Statute of institution, Bulletin and documentation on issued accreditation and license. In total, this makes 10 documents of 21 which were the subject of research. The remainder of documentation or groups of documents that were subject of this research are not available to the public.

Mark: 2.4

**Organisation**
There is a list of deans and vice deans with biographies, but without contacts. The list of member of Management Board is given, but without biographies and contacts.

Mark: 1.3

**Study programmes**
Data on study programmes and ECTS catalogues are available on website, but data on learning outcomes are not available.

Mark: 3

**Employees**
List of employees with biographies is available together with ECTS catalogues.

Mark: 4

**Projects and publications**
Information about projects is not available on website, but data on publications of this institution is published in the [Library](#) section. The FMLL has a rich publishing
activity, which is reflected in seven libraries through which they publish various papers in areas such as philology, literature, dictionaries, etc.  

Mark: 2.67

Repository
FMLL’s website has overview of some graduation papers in the section Students, under the topic Graduation papers. 45

![Print screen of website of FMLL in the part of published work](image)

Mark: 3

Finances
There are no financial reports on website, but there are data on public procurement, as well as rulebooks that regulate this area. In addition, public procurement can be monitored also via Portal for Public Procurement, but for the purpose of this research, the CCE’s team did not check this portal.

Mark: 1.5

Student issues
The academic calendar and schedule of lectures as per semester are available on website. Part relating to scholarships and competitions, as well as the student parliament, are not available on website, while the data on international cooperation are given in the form of a short narrative.

Mark: 2.25

Average mark for Faculty of Montenegrin Language and Literature: 2.52

45 Website of Faculty for Montenegrin Language and Literature, [http://www.fcjk.me/diplomski-radovi](http://www.fcjk.me/diplomski-radovi)
View from the students’ standpoint

For the purpose of providing a comprehensive insight into transparency of higher education institutions in Montenegro, the research team of CCE has organised also a focus group with students, which included students from three universities, as follows: University of Montenegro (UoM) 46, University of Donja Gorica (UDG) 47 and Mediterranean University48.

When discussing how they perceive the transparency of faculties they are studying on, students presented a series of observations that indicate that more or less they face similar challenges regardless of whether they are studying at state or private higher education institutions. They are familiar with websites of institutions where they are studying, and in general, when it comes to transparency, they put the focus on availability of current data on student issues, and do not recognize the importance of other areas in which higher education institutions should show openness. For them, the most important information is related to academic calendar, schedule of exams, lectures, score lists, mobility programmes, etc. In that part, they rated their institutions as relatively transparent, but pointed to the problems that they continually have with student services. According to their assessments, the work of these services is at an unsatisfactory level, which also affects the availability of data. They also believe that there are internal communication problems in these institutions, which result in untimely publication of data or even non-disclosure. Students of private higher education institutions emphasized that it is very important that the results of the knowledge-checks are anonymized, which is not the case with all faculties at UoM, i.e. there are faculties where these data are fully accessible to the public.

During discussion during the focus group, students stated that announcements for awards, competitions, conferences or trainings are often not published timely, and sometimes it is not easy to find them on website. This makes applying difficult for them, and some have also mentioned that another aggravating circumstance is that it is not sufficiently highlighted in the competition to which faculties it relates to.

Students are not familiar with the institution’s budget or the manner in which these funds are spent, but they estimate that working conditions at these institutions need to be better. Also, one of the identified shortcomings is the inaccessibility of the appropriate literature due to the limitations of library funds at universities.

46 Students of Faculty for Political Sciences, Economic Faculty and Faculty of Science and Mathematics
47 Students of Faculty for International Economy, Finances and Business, Faculty of Arts and Faculty for Design and Multimedia
48 Students of Faculty of Law
Students assess that private universities are more open and flexible in providing support to students to participate in mobility programmes or other related programmes, such as *Work and Travel*. At UoM, there is, according to them, an uneven approach, which is why there are examples of some students being damaged because of departure abroad in terms of loss of the year or non-recognition of exams.

When it comes to social networks of higher education institutions, students assess that they are being used more for self-promotion of these institutions and lecturers, and less for publishing useful information.

When it comes to work of student organisations, students do not have enough information. During the focus group, UoM students expressed even a dissatisfaction with the work of student representatives who, in their opinion, abuse their position and do not use their influence to make it easier for other students to study. At the same time, UDG students stated that they were not familiar with the fact that they had representatives at that university, and during the course of the focus group, they found information about the elections for student representatives on the website for last year. On the other hand, at the Mediterranean University, they say they are active and that they cooperate with professors and the rector.
Good practices from vicinity

As one of the bright examples of transparency in the vicinity, the University of Ljubljana stands out, which is placed on relevant international lists that measure the quality of higher education and is well positioned. Therefore, it has been singled out as an example that could be inspiring to Montenegrin higher education institutions, and data about it, as well as data for Montenegrin institutions, are downloaded from the website of this University.

University of Ljubljana

University of Ljubljana is the oldest and largest higher education and scientific research institution in Slovenia, founded in 1919. University of Ljubljana is attended by 40,000 students and employs approximately 5,800 university professors, researchers, assistants and professional and administrative staff in 23 faculties and three arts academies, offering in total more than 400 study programmes. It is ranked amongst the top 500 universities according to the world lists Shanghai, Times and WEBOMETRICS, thus entering the 3% of most prominent world universities.

The Faculty of Economics of Ljubljana University can take pride in having its International master programme in Business and Organisation (IMB) enlisted on prestigious Financial Times list among the best programmes of this type in the world.

At the website there are plans and reports on work annually for every organ of University (rector, Senate, Management Board, Student Council). There is a list of jurisdiction, members, minutes from sessions, decisions and work plans for every organ. There is also annual report on work, annual work plan and strategy of University.

In addition to rulebook for election to title, on webpage of University there are also Rules of procedure on conditions and criteria for election to academic title with all amendments as per academic year. Rules of procedure encompass the procedure of selection itself, general and particular and qualitative and quantitative conditions for each title individually, and in second part there is score list of scientific achievements.

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49 https://www.uni-lj.si/o_univerzi_v_ljubljani/
50 https://www.uni-lj.si/studij/
51 https://www.uni-lj.si/v_ospreduj/2018091015330826/
52 https://www.uni-lj.si/o_univerzi_v_ljubljani/organizacija__pravilniki_in_porocila/predpisi_statut_ul_in_pravilniki/
53 https://www.uni-lj.si/o_univerzi_v_ljubljani/organizacija__pravilniki_in_porocila/organi_univerze/
54 https://www.uni-lj.si/o_univerzi_v_ljubljani/organizacija__pravilniki_in_porocila/poslovno_financno_in_letno_porocilo_ter_program_deila/
pedagogical and professional activity. For easier understanding of Rules of procedure, there are instructions for their application and individual interpretations of Rules of procedure given by members of University.  

Brief description of faculty with contacts, programmes that offer and other activities can be found already at the page of University itself. As per faculty, there are lists of academic and non-academic staff, their contacts, biographies, achievements, and bibliography. Biographies are divided in parts (more than 25 sub-categories), monographies and other conclusive papers (more than 12 sub-categories), participation in events (more than 25 sub-categories), secondary authorships (mentorships on final papers, comments, editorials) and other. For each subject there are detailed work plans and learning outcomes.

The number of offered subjects i.e. programmes in English is also significant. This list is available in for this intended section of the website, for basic studies as per faculty unit, plus master programmes, doctoral and joint programmes of studies in English language. The International Cooperation Office of the University is responsible for international exchange, as well as coordinators in international offices in each member state.

Career centres with career advisers at the University of Ljubljana are active in 23 faculties and 3 academies providing students with support in their studies and career development. In this context, they cooperate and connect with external associates, especially employers. They help students with selection or continuation of studies, reflection on entrepreneurship, finding information about scholarships, internships or workplaces abroad, finding a job and improving skills and knowledge.

In 2016, University of Ljubljana published 2,538 articles in WoS. It currently conducts
480 projects financed by Slovenian Research Agency (ARRS), 428 EU projects and projects of other European programmes.

Special section of the website is intended for the quality of studies which contains all important projects, consultations and advising related to quality of studies, rankings on international lists, annual quality reports for University and for certain members, internal and external audits with implementation rules, international evaluation and accreditation, results of student surveys on satisfaction with the quality of studies and conditions. In 2007, in accordance with the guidelines of the European University Association (EUA), the University of Ljubljana founded the Doctoral School, which assumed the institutional responsibility for doctoral studies in the programmes of all scientific disciplines.

Section of Business Cooperation and Wider Social Environment aims to transfer knowledge and strengthen the developmental work of researchers and prepare graduates for independent careers by improving the relations between education with research and business community. The Knowledge Transfer Office, the Institute for Innovation and Development, the Social Entrepreneurship Centre, the Ljubljana University Incubator, the Slovenian Innovation Hub, and numerous international projects are also abundant.

The University cooperates with more than 30 universities in southern and eastern Europe and on the basis of other bilateral agreements with more than 100 institutions abroad. Members of the University of Ljubljana have an additional 350 agreements with foreign partners, and within the Erasmus + programme of exchange of students and employees, the University of Ljubljana cooperates with more than 460 universities and 1,400 faculties in Europe.

University of Ljubljana is included in international associations, such as Utrecht network (UN), association of universities UNICA, cooperates with consortium of universities MAUI and AEN. It is a full member of the EUA, EUCEN, CEI, SAR, Alps-Adriatic Rectors Conference, CEEPUS, CELSA, The Guild and

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68 https://www.uni-lj.si/o_univerzi_v_ljubljani/kakovost/projekt_kul/
69 https://www.uni-lj.si/sodelovanje_z_gospodarstvom_in_sirsim_druzbenim.okoljem/
70 https://www.uni-lj.si/raziskovalno_in_ravno_delo/intelektualna.lastnina/
71 https://www.uni-lj.si/sodelovanje_z_gospodarstvom_in_sirsim_druzbenim.okoljem/innovacijsko.razvojni.institut/
72 https://www.uni-lj.si/sodelovanje_z_gospodarstvom_in_sirsim_druzbenim.okoljem/sredisce.za_socialno_podjetnistvo.si/o_nas/
73 https://www.uni-lj.si/sodelovanje_z_gospodarstvom_in_sirsim_druzbenim.okoljem/ljubljanski_univerzitetni.inkubator/
74 https://www.sis-eqiz.eu/
75 https://www.uni-lj.si/sodelovanje_z_gospodarstvom_in_sirsim_druzbenim.odoljem/prenos_znanja_skozi_mednarodne.projekte/
76 https://www.uni-lj.si/mednarodno_sodelovanje_in_izmenjave/
77 Universities of capital cities
78 Universities in USA
79 Universities in Australia
80 European University Alliance, dealing with issues of higher education and research policy
81 University network for continuous education, dealing with issues related to life-long learning
82 Central European Initiative
83 Scholar at Risk
84 Central European Exchange Programme for University Studies
85 Central Europe Leuven Strategy Alliance
the Western Balkans Platform. In order to raise the quality of study programmes, strengthening the international cooperation and reputation of the University of Ljubljana, the University of Ljubljana’s Global Network was established, which brings together scientists, professors and other prominent figures working in academic, research and developmental environment abroad. 86

Library system of the University of Ljubljana consists of 38 libraries of individual faculties together with the Central Technical Library and the National University Library. 87 Also, students and employees are provided with an access to up to 20,000 digital magazines and over 170,000 books through a digital library (DIKUL).

The University of Ljubljana repository enables the collection and storage of electronic versions of final papers, publications of employees at the University and research data. Authentication is needed prior to entering the paper into Repository. Users are provided with bilingual web and mobile application for using the contents of the Repository88 that contains almost 84,000 files. 89 Each year, an annual report is produced, showing the number of views and downloads of individual materials. 90

Data related to the call for public tenders91 and public procurements92 are available in a separate section. All costs, expenditures and contributions are included in the annual report and the annual work plan. 93

86 https://www.uni-lj.si/studij/smul/
87 https://www.uni-lj.si/knjiznice/
88 https://repozitorij.uni-lj.si/info/index.php/slo/kaj-je-rul
89 https://repozitorij.uni-lj.si/Statistika.php?lang=slv
90 https://repozitorij.uni-lj.si/Statistika.php?cmd=porocilo&lang=slv
91 https://www.uni-lj.si/aktualno/razpisi/
92 https://www.uni-lj.si/aktualno/javna_narocila_in_razpisi/
93 https://www.uni-lj.si/o_univerzi_v_ljubljani/organizacija_pravilniki_in_porocila/poslovno_financno_in_letno_porocilo_ter_program_dela/
Recommendations

The overall objectives of education reform in Montenegro relate to provision of preconditions that will ensure that each individual can acquire knowledge, skills and competences necessary for successful personal and professional life and inclusion of the state in the international labour market and knowledge. In this context, transparency has an extremely important place, although it is visibly underestimated by higher education institutions in Montenegro.

In order to improve and »shatter« the existing walls of non-transparency around Montenegrin universities and faculties, but also to assert the transparency as a principle, it is necessary to:

- Conduct effective measures of integrity strengthening on all higher education institutions;
- Determine indisputably by Law on Free Access to Information the obligation of all higher education institutions to publish information about their work, considering that even the private institutions perform activity of public interest, which would imply publishing the identical set of data on websites of these institutions, especially financial reports and external audits of the same;
- State Audit Institutions (SAI) should perform audit of financial operations of UoM, especially taking into account that the last time this was done was almost ten years ago, and even partially so, as well as that this audit report carried only conditionally positive assessment. Since then, the UoM has received over 140 million Euros from the Budget of Montenegro, without controls of these funds by the SAI;
- Produce publicly available database on workload of teaching staff regarding subjects and number of classes on all higher education institutions;
- Agency for Control and Quality Assurance of Higher Education should conduct continuous monitoring of duration of studies on all institutions, pass-rate of students and age in which they usually complete their studies, in order to make an assessment of effects of reform in education of quality cadres via average assessment of studying and reduction of duration of studies.
- Render available the lists of students who finished basic studies, master and doctoral studies on higher education institutions on which they have acquired these diplomas as per academic year, for the purpose of verification of pass-rate of students and prevention of occurrence of ‘diploma purchase’;
- Introduce legal obligation for all higher education institutions to archive final graduate, master and doctoral papers of their students in open electronic
repositories so that the Montenegrin public could have an opportunity to inform itself on research work of higher education institutions in the country and ensure quality and authenticity of these papers;

- **Publish master and doctoral papers of all employees on universities** in order to introduce the interested public with references of employees, thus influencing also the prevention of possible irregularities during election to titles and employment, and biographies of employees in addition to basic information, scientific area in which they work and bibliographies, should also note their key achievements;

- **Publish in bulletins of higher education institutions the names of mentors of those students for whose master and doctoral papers it was determined they were not authentic**;

- **Improve social networks** of institutions in order to provide timely and meaningful informative content to student population;

- **Develop a special software for students which will be personalised and contain only data related to their department**, considering that this is already widespread outside of Montenegro and that it renders the work of student service easier, which was assessed as ‘bottleneck’ in functioning of institutions. Software can be utilised for purposes of registration of study-year, exams, submissions of pleas, requests etc., and it would reduce the administration, ease communication with institution’s staff and improve availability of basic information for students;

- **Agency for Control and Quality Assurance of Higher Education should make a rank list of higher education institutions**, whereby transparency of their work should be one of parameters as per which these institutions will be ranked and which their final positions would depend on.
• Law on Higher Education of Montenegro, ‘Official Gazette of Montenegro’ No. 44/14, 52/14, 47/15, 40/16, 71/17 and 55/18
• Law on Budget of Montenegro for 2018, ‘Official Gazette of Montenegro’ No. 90/17, 17/18 and 55/18
• Law on Free Access to Information, ‘Official Gazette of Montenegro’ No. 044/12 and 030/17
• Financial plan of University of Montenegro for 2018
• Financial plan of University of Montenegro for 2017
• Financial plan of University of Montenegro for 2016
• Financial plan of University of Montenegro for 2015
• Strategy for Higher Education Development in Montenegro 2016-2020
• Standards and Guidelines for Quality Assurance in the European Higher Education Area (ESG), 2015
• Analysis of condition and strategic goals for reorganisation and integration of University of Montenegro, UoM and EUA, 2015
• Reforming of the Reform – annual report on Rector’s work for 2016 – 2017, University of Montenegro
• Opinion of Rector on candidacy of prof Stevan Šćepanović, No. 02-2917/4-1 from 30/11/2016, submitted to Management Board of UoM
• Evaluation report, European University Association, Institutional Evaluation Programme, June 2014
• Research on corruption in education, Centre for Civic Education (CCE), 2016
• Guidelines for election to academic titles, UoM
• Rules in relation to election to titles, UoM
• Statute of Student Parliament, UoM

Ministry of Education of Montenegro - http://www.mpin.gov.me/ministarstvo
University of Montenegro - https://www.ucg.ac.me
Faculty of Architecture - https://www.ucg.ac.me/af
Biotechnical Faculty - https://www.ucg.ac.me/btf
Faculty of Economics - https://www.ucg.ac.me/ef
Faculty of Electrical Engineering - https://www.ucg.ac.me/etf
Faculty of Dramatic Arts - https://www.ucg.ac.me/fdu
Faculty of Fine Arts - https://www.ucg.ac.me/flu
Faculty of Political Science - https://www.ucg.ac.me/fpn
Faculty for Sport and Physical Education - https://www.ucg.ac.me/sport
Faculty of Tourism and Hospitality - https://www.ucg.ac.me/fth
Faculty of Philology - https://www.ucg.ac.me/fil
Faculty of Philosophy - https://www.ucg.ac.me/ff
Faculty of Civil Engineering - https://www.ucg.ac.me/gf
Institute of Marine Biology - https://www.ucg.ac.me/ibm
Historical Institute - https://www.ucg.ac.me/i
Faculty of Mechanical Engineering - https://www.ucg.ac.me/mf
Faculty of Medicine - https://www.ucg.ac.me/med
Faculty of Metallurgy and Technology - https://www.ucg.ac.me/mtf
Music Academy - https://www.ucg.ac.me/ma
Maritime Faculty - https://www.ucg.ac.me/pfkotor
Faculty of Law - https://www.ucg.ac.me/fp
Faculty of Science and Mathematics - https://www.ucg.ac.me/pmf
Centre for Excellence of Innovations and Research - https://www.ucg.ac.me/ciii

University of Donja Gorica – https://www.udg.edu.me
Faculty for International Economy, Finances and Business - https://www.udg.edu.me/fmefb/
Faculty for Information Systems and Technologies - https://www.udg.edu.me/fist/
Polytechnics - https://www.udg.edu.me/politehnika/
Faculty of Law - https://www.udg.edu.me/fpn/
Humanistic Studies: diplomacy, security and communicology and media - https://www.udg.edu.me/hn/
Faculty of Arts - https://www.udg.edu.me/fu/
Faculty for Food Technology, Food Safety and Ecology - https://www.udg.edu.me/ftpsbhe/
Faculty of Sports Management - https://www.udg.edu.me/fsbm/
Faculty of Design and Multimedia - https://www.udg.edu.me/fdmm/
Faculty for Culture and Tourism - https://www.udg.edu.me/fakt
UDG Centre for Foreign Languages - http://www.udg.edu.me/cfl
Faculty of Philology - https://www.udg.edu.me/fakulteti/ff

Mediterranean University – http://unimediteran.net/index.php/mne/
Faculty of Tourism 'Montenegro Tourism School' - http://ftth.unimediteran.net/index.php/mne/
Faculty for Economy and Business - http://fps.unimediteran.net/index.php/mne/
Faculty for Information Technologies - http://fit.unimediteran.net
Faculty of Visual Arts - http://fvu.unimediteran.net/
Faculty of Law - http://pf.unimediteran.net/index.php/mne/
Faculty of Foreign Languages - http://fsj.unimediteran.net/

Adriatic University - http://www.univerzitetadriatik.com/pocetna.htm
Maritime Faculty Bar - http://www.pfbar.me
Faculty for Business Economy - http://fpebar.me
Faculty for Business and Tourism - http://www.fbt-budva.com/index.php?lang=me
Faculty for Mediterranean and Business Studies Tivat - http://www.fms-tivat.me/index.htm
Faculty for Management Herceg Novi - https://www.fm-hn.com
Faculty for Mediterranean and Business Studies Ulcinj - http://www.fms-tivat.me
Faculty for Traffic, Communications and Logistics Budva - http://www.fskl-cq.me/me
Faculty of Administrative and European Studies - http://www.fdes.me
Faculty for Montenegrin Language and Literature - http://www.fcj.k.me
Faculty for Business Management Bar - http://www.fpm.me
Faculty for International Management in Tourism (HEC) - http://www.hecmontenegro.com/hecfaculty/clone/index.php

University of Ljubljana - https://www.uni-lj.si
TAXIS portal of Department of Public Revenues of Montenegro https://eprijava.tax.gov.me/TaxisPortal
