

EUROPEAN CITY INDEX 2025:

THEMATIC FINDINGS AND RECOMMENDATIONS



Transparency International Ukraine is an accredited representative of Global Transparency International. Since 2012, TI Ukraine has been helping Ukraine grow stronger. The organization takes a comprehensive approach to the development and implementation of changes for reduction of corruption levels in certain areas.

TI Ukraine launched the Transparent Cities program in 2017. Its goal is to foster constructive and meaningful dialogue between citizens, local authorities, and the government to promote high-quality municipal governance, urban development, and effective reconstruction. For eight years, the program compiled an annual Transparency Ranking of the 100 largest cities in Ukraine, and in 2025 it launched the European City Index.

The program's experts produce high-quality analysis of various aspects of the interaction between government and citizens, and of transparency and accountability in Ukraine's cities. This includes, in particular, processes such as decolonization, housing policy, and more.

<https://ti-ukraine.org/en>

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Each of us has our own idea of what makes a good European city. For some, it is modern public transport and convenient e-services. For others, it is clean streets and barrier-free spaces, innovative solutions, or vibrant local democracy. All of this matters. But our team is interested in what lies behind these very different manifestations: the rules a city lives by, how its institutions work, and what that ultimately means for people.

Can a resident easily find the document they need, understand where the money goes, receive a service, check public transport schedules, ask city leadership a question and get an answer? Can they join the discussion of a decision before it is adopted? And ultimately, what logic determines the format of learning for schoolchildren and students, and how can a person not only find the nearest shelter but also reach it and stay safe there?

Our team set out to conceptualize these seemingly very different experiences and needs – to break the idea of a “European city” down into specific rules and practices that can be observed and measured. That is how the European City Index came about. It brings together things of very different scale: thematic sections on key topics, strategic documents in a logical place, accessible e-services and high-quality open data, mayors reporting to the community, accessible city council sessions, public engagement in budget-making, effective management of public resources and corruption risks, and more.

We deliberately treated all these issues as parts of a single system. An e-service on air quality or a decision posted online does not, on its own, make a city European. Nor does simply holding a public consultation or adding a data layer to a map. What matters is how these mechanisms work for people: whether information can be found and used, whether a service can actually be accessed, whether participation turns into influence, and whether an official will explain a complex decision and listen to the community.

For us, then, the European City Index is an attempt to understand how close Ukrainian cities have come to a model in which government works openly, accountably, and with respect for people – and how systemic and sustainable these practices are. The first-year results confirm that some elements of this model are already familiar to our cities, while a coherent system is still lacking: strong solutions in one area often sit alongside gaps in another. This is the path – from individual good practices to strong institutions – that we want to help cities take.

Because strong institutions are ultimately about being able to live with dignity in your city and understand the rules by which it works. They are about predictable and fair decisions, about confidence that your rights and needs do not depend on the goodwill of a particular person, and that the system will keep working even when times get hard. Ukrainians already have to live with extreme uncertainty and in extraordinarily difficult circumstances. That is why cities must strive, more than ever, to give people a sense of stability.

Perhaps this is one of the most important hallmarks of a European city today: it is a city at war, yet one you still want to stay in, because you can build a life, study, work, raise children, and plan at least some kind of future. You trust its rules and institutions and are willing to be patient at times, understanding at others, and supportive when needed. It seems this is exactly the kind of confidence we all lack so badly today.

Olesia Koval, Manager of the Transparent Cities Program

Key findings and conclusions

At a glance

- Over the course of a year (October 2025 – July 2026), analysts examined **six areas of local self-government (subindices) in turn**: openness of city councils; e-services; open data; public finance; integrity and anti-corruption; accountability.



openness of city councils



e-services



open data



public finance



integrity and anti-corruption



accountability.

- The pilot sample comprises **11 cities**: ten regional centers (Dnipro, Zaporizhzhia, Kropyvnytskyi, Lutsk, Lviv, Odesa, Poltava, Kharkiv, Khmelnytskyi, Chernihiv) and Kyiv. The selected cities represent all of Ukraine's macro-regions and every transparency level in the 2024 Transparency Ranking. They also cover a range of wartime contexts, from rear-area cities to cities designated as territories of potential hostilities.
- Each of the six subindices, which cover separate areas of local government activity, was assessed using 40 indicators, with a maximum city score of 100 points per subindex.** The indicators were aligned with three kinds of sources: the key documents setting out requirements and recommendations for Ukraine on its path to EU integration; relevant sectoral documents; established international research methodologies.
- A methodological principle applied across all subindices was the **"single point of entry,"** which draws on the European approaches of user-centricity and one-stop shops. Under this principle, official city council websites should maintain **permanent thematic sections** that bring together, organize, and regularly update all reference information on a given topic. These sections should also provide working links to relevant internal and external documents and resources.
- Each subindex contributed equally to a city's final Euroindex score (weighting factor: 0.167).
- The **average Euroindex score across the 11 pilot cities was 44** out of 100.
- Kyiv and Lutsk topped the Euroindex based on their 2025 performance.** The capital performed best in the "e-services" and "open data" subindices, while Lutsk led in the "integrity and anti-corruption" and "accountability" blocks. Both cities showed a European approach to user-centricity. On their city councils' official websites, analysts found 93% (Kyiv) and 80% (Lutsk) of the single points of entry to thematic sections they looked for. However, even the leaders' scores (55.3 and 53.4 out of 100) show that Ukrainian city councils are not yet well prepared to meet EU integration requirements for transparent democratic governance.

- **Chernihiv and Poltava performed worst.** Poltava ranked in the bottom three in five of the six subindices, and only a high score in the “accountability” block kept it from finishing last overall. In Chernihiv, every component of the Euroindex proved problematic: the city scored below 50 points in all blocks.
- **European practices are already part of how Ukraine’s city councils operate, but much work remains.** This is confirmed by the average Euroindex score of the 11 cities in the pilot sample – 44 out of 100 points – and by individual city scores ranging from 29.9 to 55.3 points.
- **City councils have implemented basic openness to a high standard.** In 2025, all or nearly all municipalities published decisions of the council and executive committee and mayoral orders, posted videos of sessions and standing committee meetings, and provided access to the Charter of the territorial community, the Rules of Procedure of the city council, current legal regulations, and regulatory activity plans.
- **City councils show readiness to solve local problems with new technologies.** Real-time tracking of municipal transport and cashless fare payment, online kindergarten enrollment with remote queue tracking, round-the-clock intake of citizen appeals through an electronic contact center, e-petition services, and online booking at Administrative Service Centers have become everyday practice in nearly all pilot cities.
- **The gap between cities in 2025 was significant and consistently visible in every subindex studied.** The smallest spread of results was in the Openness block (28 points), and the largest in the Accountability block (54 points). This shows the absence of a single model of transparent democratic governance that all city councils could follow on their path to EU integration.
- **No city council led single-handedly across all the EU integration areas studied.** Ten of 11 municipalities made the top three in at least one subindex, which shows a lack of systemic management practices in each council: successes are fragmented and tied to specific areas rather than to the municipality’s institutional culture as a whole.
- **The war had an impact but was not the decisive factor in adopting European governance practices.** The average Euroindex score of the three frontline cities was only five points lower than that of the eight cities not located in territories of potential hostilities. Zaporizhzhia was among the leaders in the Accountability and Integrity and Anti-Corruption subindices, and Kharkiv in the E-services block.
- **Formal compliance prevailed over substance.** A few examples: the Open data block showed that publishing datasets does not ensure their quality; the Openness block, that setting up commissions to review compensation for damaged property does not guarantee that data on their decisions are made public; the Public finance block, that holding budget hearings does not mean residents’ proposals are compiled and shared; and the Integrity block, that having anti-corruption officers in place does not guarantee publication of monitoring data on the current anti-corruption situation.
- **Strategic planning remained the Achilles’ heel of local self-government.** The Ministry for Communities and Territories Development approved methodological guidelines on developing, approving, implementing, monitoring, and evaluating territorial community development strategies back in 2022. Yet as of 2025, only 3 of the 11 Euroindex participants had adopted a current territorial community development strategy – the document meant to carry European standards into local self-government practice and to keep reforms on track regardless of staff changes, political cycles, or external challenges.

- **The management cycle “plan → implementation → report → feedback → adjustment” often broke down as early as the third stage.** Significant gaps were found even in formal accountability for 2025, when reporting required nothing more than publishing the relevant documents: 10 socioeconomic development programs yielded 8 published reports, 8 informatization programs just 3, and so on.
- **Feedback between city councils and communities proved one of the weakest links across all subindices. Difficulties arose both in designing the relevant procedures and in following them.** For example, a dedicated page on the official website explaining how to attend council sessions is a prerequisite for a simple path from a citizen’s wish to attend a meeting to actually doing so. In 2025, only 3 of 11 city councils had one. Another example: the mayor must report to the territorial community at least twice a year at an open meeting that allows residents to ask questions, comment, and make proposals, with the text of the report published a week before the event. Only 4 of 11 mayors reported on their work at an open meeting in 2025. No city published the text of the report within the statutory deadline.
- **Resident engagement in decision-making – the foundation of democracy – was often merely declarative.** No city published a list of public proposals on the draft 2026 budget in a dedicated budget section, and 10 of 11 cities did not publish minutes of public hearings on the draft budget or the results of consultations with business on procurement.
- **Only Kyiv applied the “single point of entry” principle systematically to topics on the official city council website.** This user-centric European approach has not yet become an across-the-board management practice: it depends on the specific unit or topic rather than on a consistent approach to organizing information on websites.
- **Responsibility for the gaps does not rest solely with local self-government bodies.** The low implementation of Open data indicators stems not only from insufficient attention by city councils but also from external factors. Since 2022, the datasets of Zaporizhzhia and Kharkiv have been removed from public access by the state, and access has still not been restored – even for datasets whose publication poses no threat to national security, territorial integrity, or public order. In addition, the Ministry of Digital Transformation of Ukraine has not set up monthly automated transfer of data from the local open data portals of Dnipro, Kropyvnytskyi, Lutsk, and Lviv to the Unified State Open Data Web Portal.

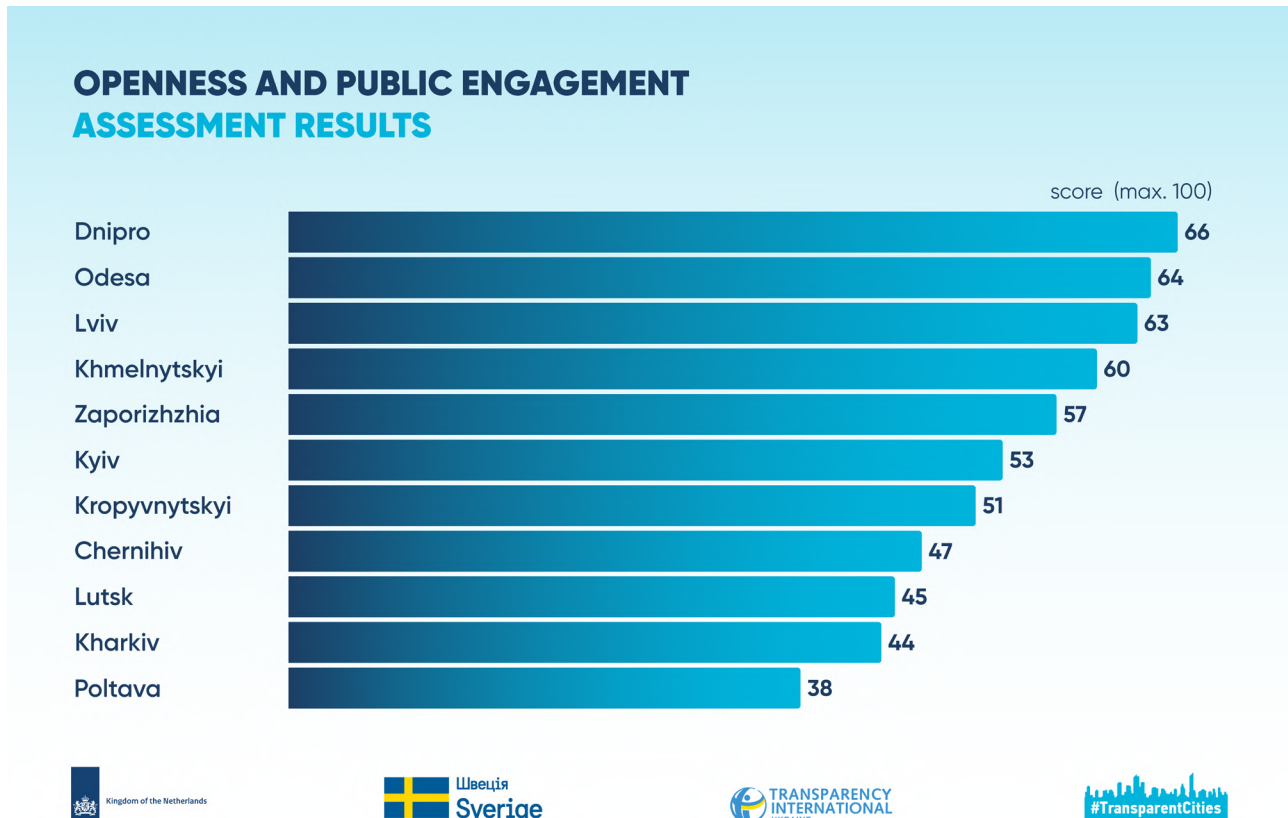


Read more at: transparentcities.in.ua/european-city-index

Brief conclusions

The average implementation rate across the 40 indicators of **Openness** and Public Engagement is 53.5%.

Dnipro achieved the highest result – 66 out of 100 points. One position lower is **Odesa** with 64 points, followed by **Lviv** with 63 points. The lowest results were recorded in **Poltava** (38), **Kharkiv** (44), and **Lutsk** (45). Kyiv ranked in the middle with 53 points.



Viewing openness through the lens of European benchmarks highlighted the problem of formalistic approaches by local self-government bodies to publishing information. Cities that complied with legal requirements and program recommendations superficially or to the letter were less likely to achieve high scores for openness and public engagement. Program analysts put themselves in the position of a resident interested in the work of their city council or looking for specific information, but without the time, resources, or skills to sift through all the public communications of the council or mayor.

The analysis revealed several key problems in city council practices.

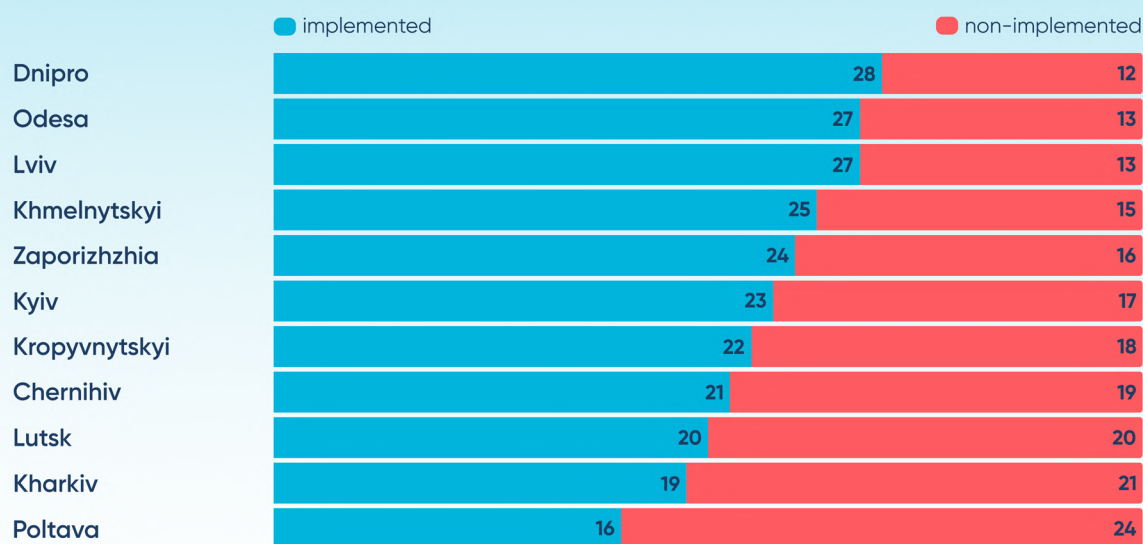
First, **official web resources of local self-government bodies are often poorly organized.** The “single point of entry” principle is applied selectively, and significant gaps persist in structuring essential information.

Second, despite the full-scale war, **cities manage humanitarian aid in a fragmented way.** Communication on aid received and distributed by city councils remains unsystematic and hard to find. This complicates coordination between authorities, residents, and partners and reduces the effectiveness of assistance.

Finally, **all of the above problems with citizen-oriented openness have a direct impact on the social sphere.** Untimely and non-transparent communication hampers access to critical information and services for internally displaced persons, defenders and their families, low-income households, and other vulnerable groups.

OPENNESS AND PUBLIC ENGAGEMENT

BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



Program recommendations

The program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account and revise their approaches to resident engagement by:

- **Reviewing the organization of the official city council website and key specialized websites.** Optimize the structure of web resources and ensure dedicated sections/pages on key topics, where all relevant documents, links, and announcements are consolidated in the most logical and user-friendly way.
- **Placing greater emphasis on transparent disclosure of information on humanitarian aid.** Ensure a dedicated section or page on the city council website with up-to-date information on humanitarian aid, available programs, procedures for receiving assistance, reports on resource distribution, and the responsible units. Information should be presented in a user-friendly format and updated regularly.
- **Communicating in a timely and accessible manner with internally displaced persons, defenders, residents who need material support due to Russian aggression, and other vulnerable groups.**

- **Ensuring consistent publication of the full information cycle on the council's work.** Maintain structured archives of all elements – from announcements to minutes – for sessions of the city council, the executive committee, and standing committees. Link these elements logically and publish them within the set deadlines (announcements must include a preliminary agenda and a link to the livestream; livestreams or video recordings must be published no later than the day after the meeting; video titles must match the meeting number and date; minutes and adopted decisions must be published on time with voting results).
- **Checking how the search tool(s) perform.** Ensure that users can quickly find information across documents, news, and other sections by keyword, with logical filtering options.

 [Read more](#)

E-services

Brief conclusions

The **average implementation rate** across the 40 indicators of the E-services block is **49.8%**.

Kyiv achieved the highest result – 70 out of 100 points. One position lower is **Lviv** with 63 points, followed by **Kharkiv** with 58 points. The lowest results were recorded in **Poltava** (27), **Chernihiv** (32), and **Lutsk** (43).



There is a correlation between the lack of an approved informatization program and low results in the comprehensive assessment of e-services.

The 11 cities analyzed have very different levels of development of their e-services ecosystems. While the spread of openness scores for this sample was 28 points, the gap between the highest and lowest scores in the second block was 43 points. This can be explained by the fact that many openness indicators – unlike e-services indicators – are requirements of Ukrainian law that city councils are obliged to follow.

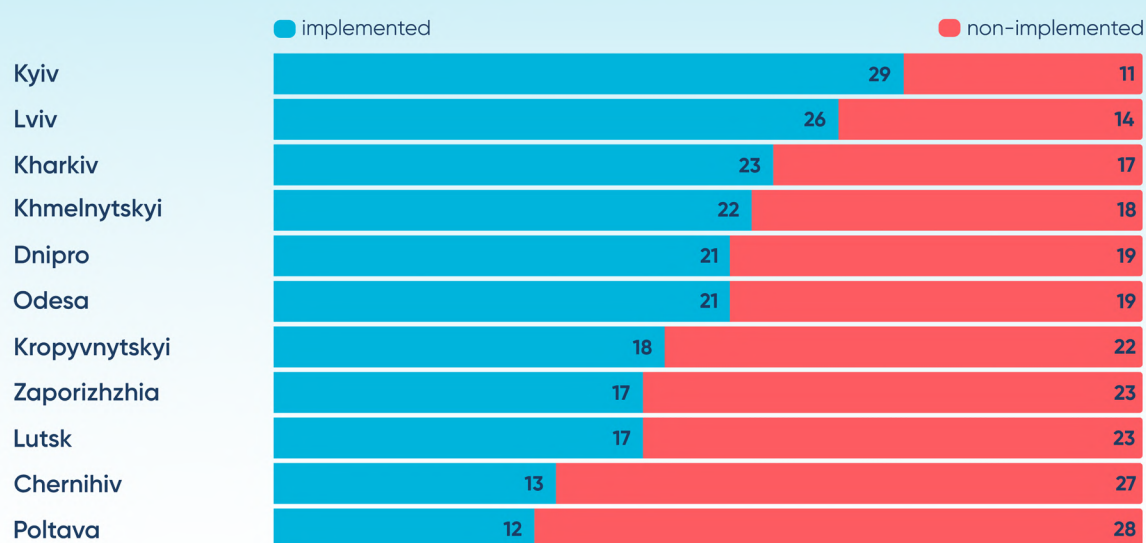
The “single point of entry” principle, an element of European governance, is applied selectively. At the same time, cities sometimes blur the line between e-services (digital tools) and public services (what residents actually receive).

There is **also clear** progress in developing digital services that support the Ukraine Facility Plan, specifically the reforms Improving Preschool Education, Comprehensive Planning of Transport Sector Development, Strengthening Tools for Citizen Engagement in Local Decision-Making, and Digitalization of Public Services.

Thanks to these services, residents of regional centers enjoy convenient access to education, transport, administrative services, and urban amenities, and can take part in local e-governance.

However, there are **major problems** with digital services related to local statistics, energy efficiency, healthcare, and social services. This does not help advance the Ukraine Facility Plan reforms set out in the Decentralization and Regional Policy, Energy Sector, and Human Capital chapters. Most importantly, local self-government bodies pay no attention to developing e-services in areas whose importance grows with every year of the war.

ELECTRONIC SERVICES: BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



Program recommendations

The program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account, specifically by:

- **Systematizing digital strategic planning and developing and approving informatization programs for the next 3–5 years.** These programs should set out the goal, priority areas, and specific objectives of the territorial community's digital development, as well as the expected results. For a community, an informatization program should be not a formality but a roadmap to a digital future.
- **Taking inventory of all their own digital services** (information and analytical systems, mobile apps, chatbots, interactive maps, interactive dashboards, etc.), and **adding relevant services offered by the state** (e.g., Open Budget and the Social Portal of the Ministry of Social Policy), **businesses** (e.g., DozoR City or EasyWay), and **civil society or charitable organizations** (e.g., EDEM: Local Petitions or e-Liky). **Links to these services should be consolidated in one section of the official city council website – a single point of entry for e-services.** There is no need to fear duplication: if municipal hospitals and clinics update data in e-Liky, links to the service should appear both in the E-services section and on the website/page of the healthcare department.

- **Developing first simple interactive e-services for local statistics or, where such services exist, regularly collecting, processing, and visualizing statistical data.** Drafting community strategic documents, making management decisions, attracting investment, and evaluating local policy effectiveness should all be backed by data. Providing access to these data does not require going straight to **creating a local statistics portal, as Lviv did; it is enough to create a dedicated section with public thematic dashboards** on the official city council website and populate it gradually, as Kyiv does.

- **Paying due attention to digital transformation of social services.** Over 3.5 years of the full-scale invasion, the number of social service recipients – individuals/families belonging to vulnerable groups and/or facing difficult life circumstances – has risen significantly. Guided by the European principles of human-centricity and inclusiveness, local self-government bodies should extend their experience with digital administrative services to social services as soon as possible:
 1. On the social protection unit's website, provide access to online pre-booking with the unit's departments/divisions (example: Lviv).
 2. On the unit's website, publish a table based on the Classifier of Social Services, listing social services and their providers and indicating whether each service can be ordered online/offline.
 3. On the unit's website, create a dedicated page explaining how to order a social service online, with links to the relevant national digital services (the Social Portal of the Ministry of Social Policy, the Electronic Account of a Person with a Disability, etc.).
 4. On the unit's website, provide access to a web form for rating the quality of social services received (examples: Kyiv, Chernihiv).

- **Always indicating the date (day/month/quarter/year) as of which the data used or displayed in e-services are current.** Currency can be shown either through an explanatory note (example: "Dashboard update frequency: daily" for the Petitions dashboard on the Kyiv City State Administration website) or through a copyright notice (example: "© 2025 Municipal Enterprise Center for Information Technology Management" on the Zaporizhzhia shelter map).

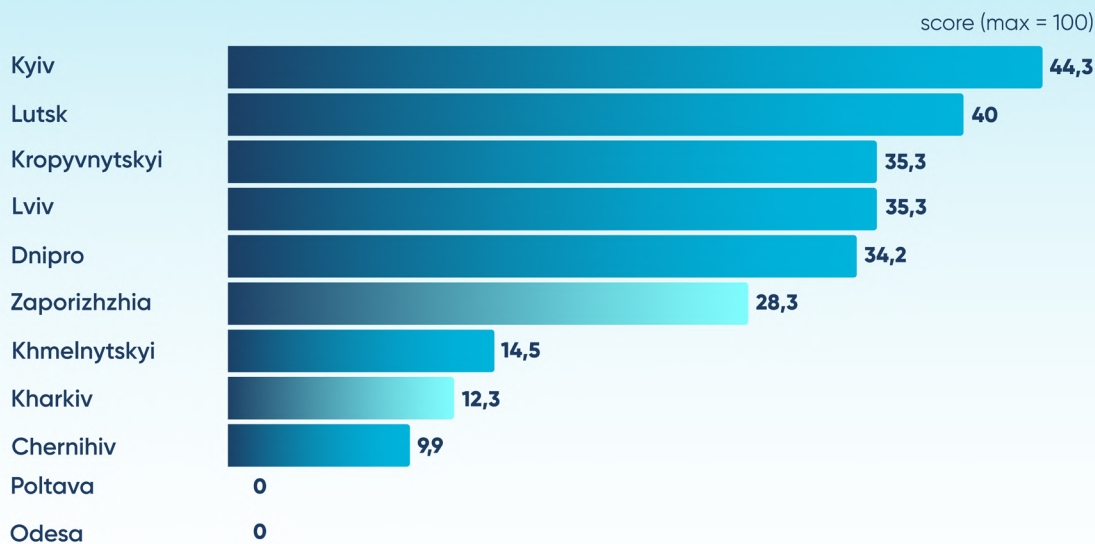
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Open data

Brief conclusions

The average implementation rate of Open data indicators across the 11 cities (23.1%) was substantially lower than in the other Euroindex blocks – Openness and Public Engagement (53.5%) and E-services (49.8%). The component on local open data policy (48.8%) scores three times higher than the component on dataset publication (15.9%). **Responsibility for this result is shared with the municipalities by the Ministry of Digital Transformation and the Diia State Enterprise**, which falls under the Ministry's management, since developing methodological guidelines, timely dataset moderation, and regular harvesting from local portals are within their remit.

OPEN DATA: ASSESSMENT RESULTS



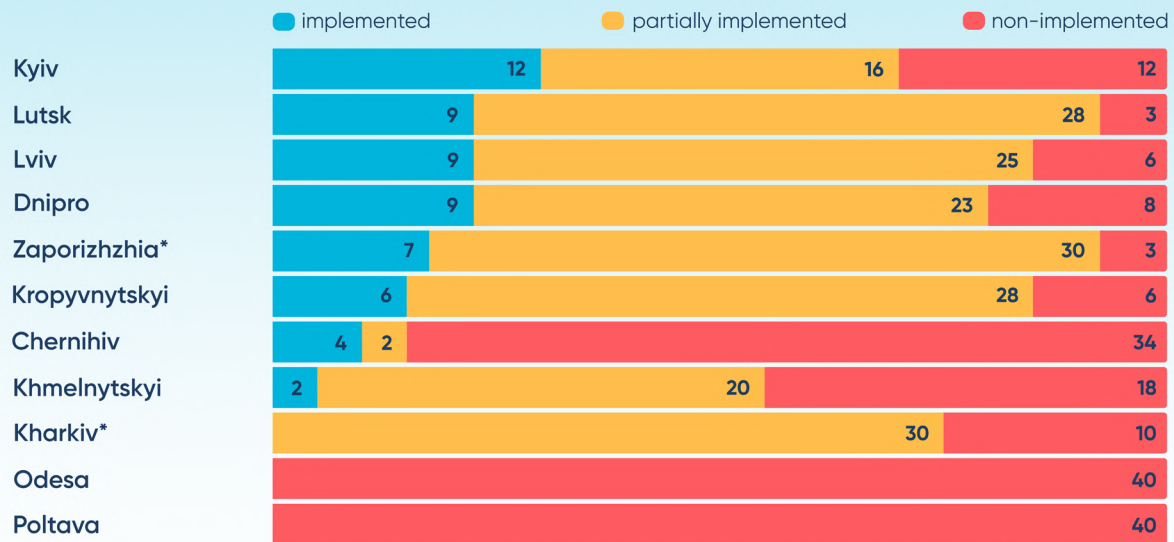
Kyiv achieved the highest result – 44.3 out of 100 points. One position lower is **Lutsk** with 40 points, followed by **Kropyvnytskyi** and **Lviv** with 35.3 points each. The lowest results were recorded in **Odesa** (0), **Poltava** (0), and **Chernihiv** (9.9).

Regional centers actively apply the “single point of entry” principle, an element of European governance, to open data policy. In a dedicated thematic section of the official website, most municipalities link to the Regulation/Procedure governing key aspects of local self-government work with open data and to the List of Datasets subject to publication as open data. In most cases, the List assigns responsibility for specific datasets to structural units and sets the update frequency for each dataset. Many city councils also link to their single electronic account on the Unified State Open Data Web Portal.

However, there are problems with defining the formats in which local self-government bodies should publish data. Few provide access to the document appointing the person(s) responsible for publishing open data. But the **biggest problem is the near-total lack of evidence that municipalities initiate, or even track, the use of their data to create e-services that could improve people's lives.**

As for **open data publication**, the datasets of Zaporizhzhia and Kharkiv have been removed from public access by the state since 2022, and among the cities that do publish data, some regional centers have still not switched to “single window” publication through the city council’s electronic account on data.gov.ua.

OPEN DATA: BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



*For Zaporizhzhia and Kharkiv, the data set scores were calculated as the arithmetic mean of the scores of the nine cities whose data sets remain publicly available



Of the 270 “EU integration” datasets analysts looked for in 9 electronic accounts, 148 (55%) had been published as of December 5, 2025. Of these, only 51 had resources updated on time. This is largely because the Dnipro, Kropyvnytskyi, Lutsk, and Lviv city councils – the leaders by number of published datasets – use their own open data portals, and the Ministry of Digital Transformation cannot ensure regular monthly transfer of data from these portals to data.gov.ua.

Timely updated datasets are very rarely published in line with the interoperability principle. Analysis showed that only 6 of the 51 timely updated datasets met all of the Ministry’s recommendations on unique object identifiers, unified dataset structure, and unified data resource structures.

The findings reveal a **gap** between indicators based on local self-government self-assessment or aggregated national indicators and the actual state of open data publication and quality at the local level.

In particular, in the Digital Transformation Index of Ukraine’s Territorial Communities, Kharkiv reported publishing 100% of its open datasets, Dnipro 99%, and Khmelnytskyi 90%, but verification under this study did not confirm these figures. Likewise, Ukraine’s high position in the Open Data Maturity 2025 ranking (4th place, with an open data maturity level of 97.1% against a European average of 81.1%) reflects national-level policies and initiatives rather than actual implementation of EU open data requirements in municipal practice.

Program recommendations

The program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account, specifically by:

In line with the updated Resolution No. 835, **approve a new internal administrative document containing the List of Datasets subject to publication as open data**. Following the Ministry of Digital Transformation's recommendations, specify for each dataset in the List:

1. The specific information managers responsible for preparation.
2. The specific information managers responsible for publication.
3. Update frequency (do not use the option "immediately after changes are made").
4. Format (do not use labels that are not formats, such as excel, API, etc.).

→ Create a **dedicated open data section** on the official city council website, with links to:

1. The document approving the Regulation/Procedure on open data.
2. The document approving the current List of Datasets subject to publication as open data.
3. The document(s) designating the person(s) responsible for publishing open data.
4. The decision to join the International Open Data Charter (if any).
5. The city council's single electronic account on the Unified State Open Data Web Portal.

→ **Compile information on services built on local self-government open data (maps, dashboards, chatbots, mobile apps) and link to these services in the dedicated open data section.**

To ensure proper dataset publication on data.gov.ua, convenient access, and the ability to compare information within a single dataset and with similar datasets of other information managers, we recommend:

- **Publishing open datasets exclusively through the city council's electronic account on data.gov.ua.**
- Creating one city council dataset for each dataset established by Cabinet of Ministers Resolution No. 835, in line with the user-centric European approach.
- Checking whether dataset titles in the city council's account match the titles in Cabinet of Ministers Resolution No. 835.
- Reviewing the Ministry of Digital Transformation's dataset publication recommendations in detail.
- Checking whether the update frequency of each dataset, as stated in its passport on data.gov.ua, matches the frequency in the approved List of Datasets.
- Preparing the recommended number of resources for each dataset. **Resource structures (table fields) must fully match the approved ones** (see the table templates on the recommendation pages). **Column names must be in English and exactly replicate those proposed by the Ministry. There is no need to duplicate column names in Ukrainian. Abbreviating column names is not acceptable.**
- Providing accurate and complete information in resources. If data for some cells are missing, those cells must be filled with "null."

- Naming **resource files and the resources themselves** as recommended by the Ministry (e.g., `regulatoryList_2026-06-01`, `titleList_2026-09-30`).
- Publishing resources only in the **formats** set out in the approved List of Datasets (CSV/JSON/XML/GeoJSON). For CSV resources, use UTF-8 encoding with comma delimiters.
- Checking that each dataset page contains as many resources as the Ministry recommends.
- Updating the resources that make up datasets through version updates (see [Example 1](#) and [Example 2](#) of correct updates of datasets containing two resources each).

Since the **Ministry of Digital Transformation** is the lead central executive body shaping and implementing state policy on open data, the holder of the data.gov.ua portal, and the body that oversees the portal administrator, the program recommends that the Ministry:

- Restore public access to datasets of information managers in Donetsk, Zaporizhzhia, Luhansk, Mykolaiv, Kharkiv, and Kherson regions whose publication poses no threat to national security, territorial integrity, or public order.
- Agree with the Ministry for Communities and Territories Development and the State Enterprise Administrator of the Urban Planning Cadastre at the State Level on a unified position regarding access to local self-government urban planning documentation under martial law, and make it public.
- Approve a Strategy for the Development of Open Data in Ukraine for the next three years.
- Enshrine the “single window” principle in new versions of Cabinet of Ministers Resolution No. 835 or Resolution No. 867.
- Issue methodological guidelines for information managers on switching to dataset publication under this principle. Pay particular attention to cases where, before the principle was applied, several information managers within one local self-government body published identically named datasets, either by exporting them in open machine-readable formats or by each providing its own API endpoint.
- Issue methodological guidelines on updating resources through version updates.
- Issue methodological guidelines on conducting an information audit.
- Clarify or remove inconsistencies in existing recommendations for publishing open datasets, including:
 1. Lists of legal regulations and individual acts (except internal ones) adopted by the information manager, draft decisions subject to discussion, and the information manager’s document designating the person(s) responsible for publishing open data.
 2. Real-time location data for urban electric and passenger road transport.
 3. List of burial registration books.
- Issue recommendations for the open dataset on the territorial community’s single public investment project portfolio, whose publication is required by Cabinet of Ministers Resolution No. 527.

- When moderating local self-government datasets, strictly enforce the “single window” principle so that structural units of local self-government bodies have no way to publish data through their own accounts.
- Set up regular monthly automated transfer of datasets from local open data portals to [data.gov.ua](#). If this technical issue cannot be resolved in the long term, officially notify the relevant local self-government bodies of what they should do in these circumstances.

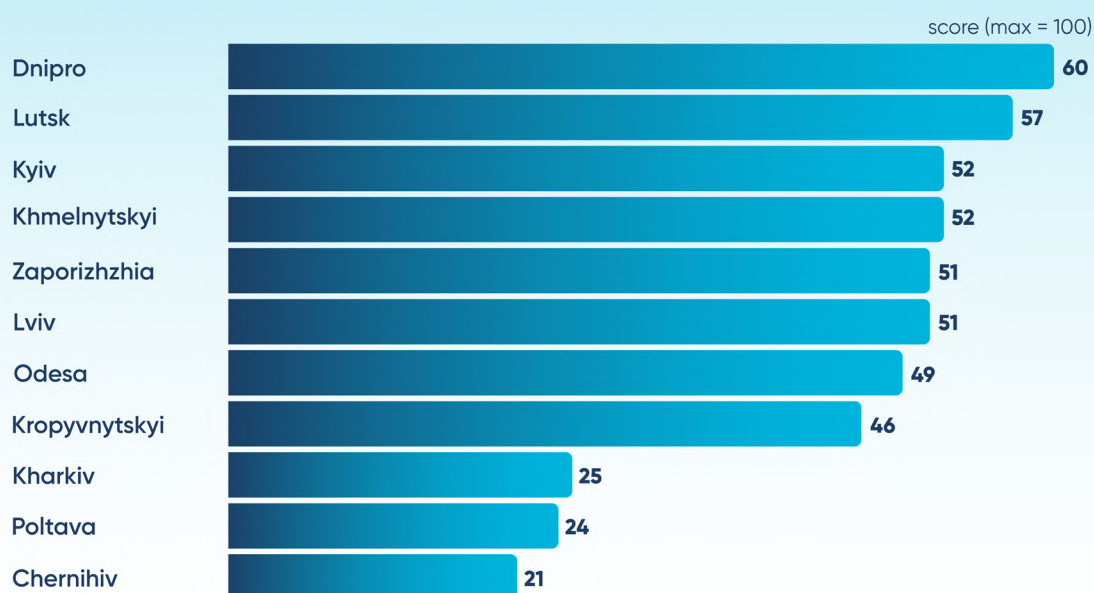
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Public finance

Brief conclusions

The average implementation rate for the Public finance block is mediocre – 44.4%. **No city scored more than 60 points, and none combined sufficient transparency with efficient management of community resources.** In other words, there is no example of a comprehensive approach: city councils did not show strong results across the key dimensions – from information availability and budget planning accuracy to effective procurement and asset management.

PUBLIC FINANCE: ASSESSMENT RESULTS

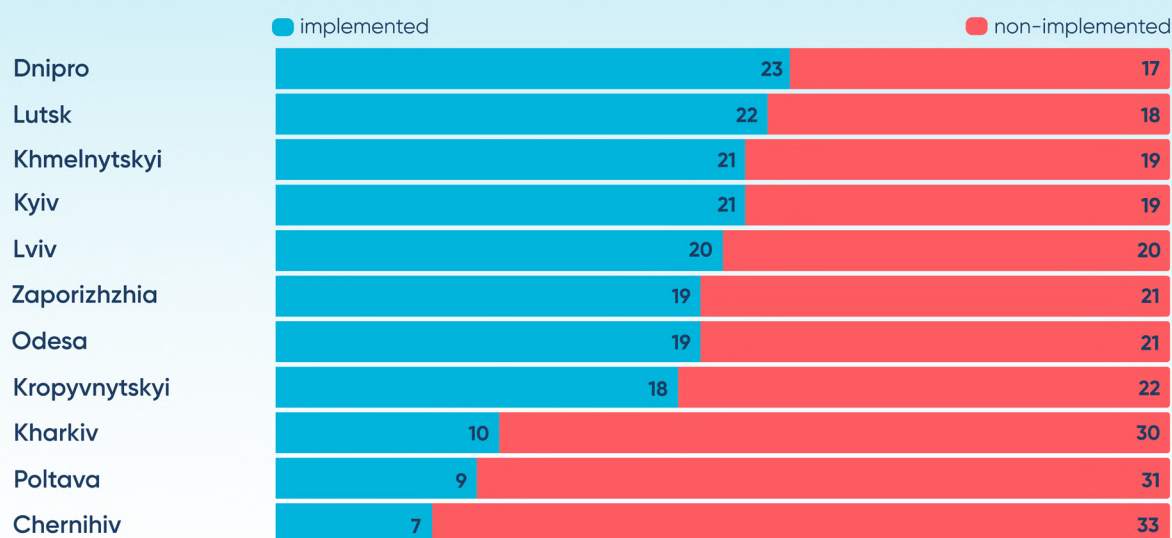


The leaders of the block earned their positions on the strength of a single dimension. **Dnipro** and **Kyiv** scored well on budget planning accuracy (per Open Budget data) and active use of Prozorro.Sale, but did not provide adequate public access to key documents. **Lutsk** and **Khmelnyskyi**, by contrast, populated the budget sections of their websites well but lagged far behind on the remaining criteria.

All cities provided contracting authority hierarchies for the BI Prozorro analytics resource and used Prozorro.Sale for municipal property lease auctions. In addition, **9 of 11 municipalities held small-scale privatization procedures on Prozorro.Sale and created a dedicated thematic section on public procurement.**

Yet **no city published a list of public proposals on the draft 2026 budget in a dedicated budget section, and none ensured publication of execution reports on budget program passports on the Open Budget portal.** Ten of 11 cities **did not publish minutes of public hearings on the draft budget or the results of consultations with business on procurement, and did not run a budget surplus in 2025.**

PUBLIC FINANCE: BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



The study shows that local authorities mostly publish the key documents on the budget process but communicate poorly about public engagement. This applies to consultations with business on improving procurement, public hearings on the next year's draft budget, and the processing of resident proposals collected through various channels. Even among the leaders (Dnipro), this is one of the most serious problems. Budget openness is defined by the quality of dialogue with the community: engaging different social groups, creating various platforms for exchanging views and proposals, and communicating the results of that dialogue.

Despite wartime challenges, **large Ukrainian municipalities maintain basic governability and budget discipline. The performance of the cities studied is on par with widely recognized European standards.** In particular, revenue planning accuracy in most municipalities merits the highest "A" rating under the international PEFA methodology (criterion: execution at 97–106%). The average deviation of actual revenues from plan was just 3.08%. Although execution ranges from 85.3% (due to Kharkiv, which faces unprecedented wartime challenges) to 104.8%, **most of the cities analyzed comfortably met the international benchmark.**

The findings also show that **proximity to the front line is not a decisive factor in resource management performance.** Cities with similar security conditions deliver different results. For example, Kharkiv and Zaporizhzhia, both designated territories of potential hostilities, met significantly more procurement and asset criteria than Chernihiv, which also faces constant security challenges. A correlation analysis confirmed that the security factor (status as a territory of potential hostilities) has no effect on procurement and asset management results.

Program recommendations

The program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account, specifically by:

In the budget process:

- **Create or expand a single thematic section on the official website devoted to the local budget.** Keep the information in this section structured and include at least:
 1. **The council's budget regulations** (if there are none, consider drafting and approving such a document to ensure a transparent budget process).
 2. **Decisions approving the budget** for the current and previous years, reflecting all amendments made during the year in a single document.
 3. **Budget planning documents** for the current and coming years: the budget forecast, budget requests of main spending administrators, etc.
 4. **Documents on local debt management**, such as the Local Debt Management Program.
 5. **The list of key budget funds administrators** with their USREOU codes and the date as of which these data are current.
 6. **Links to relevant resources:** the territorial community profile on Open Budget (State Web Portal Budget for Citizens) and the Spending portal (Unified Web Portal for the Use of Public Funds). The latter link is best placed next to the list of key spending administrators.
 7. **The full cycle of information on public engagement in the budget process.**
- **Proactively engage the public in budget planning**, in particular by holding **public hearings on draft budgets** for the next year and **collecting proposals electronically**. Process all proposals received and communicate the outcomes in a structured way in the thematic section of the official website. It is important to **publish lists of public proposals on the draft local budget for the next year**, including those received at public hearings and through other forms of public input.
- **Consider engaging subject-matter experts** to refine approaches to short- and medium-term budget planning. Exchanging experience with other cities may also help identify best approaches to budget planning under full-scale war. We also note that effective management of budget funds requires proper internal control – in particular, internal audits using a risk-based approach.
- Key spending administrators should **publish budget program passports and reports** on them within the set deadlines – passports within three working days of approval, and reports within three working days of submitting annual budget reporting – in open data format, that is, on the Unified State Open Data Web Portal (data.gov.ua) and on their own websites. **Publishing passports and reports on Open Budget (State Web Portal Budget for Citizens)** is best practice and helps make these documents known to a wide range of citizens and experts.

In public procurement:

- **Create or expand a single thematic section on the official website devoted to public procurement.** Keep the information in this section structured and include, where available:
 1. **Documents regulating procurement in the community**, such as a Procurement Policy (if one has been developed), justifications of the technical and quality specifications of procurement items (under Cabinet of Ministers Resolution No. 710), etc.

2. **Announcements of pre-tender consultations or discussions with businesses, and information on their results.**

→ **To raise the Contracting Authority Index** and improve results on other procurement criteria, pay attention to the quality of procurement by subordinate organizers across four groups of indicators:

1. **Performance:** If an organizer's share of successful procurement is low, or many procedures are canceled, it may be worth **revisiting approaches and policies for pre-tender work and market analysis**. This may indicate that tender documentation is underdeveloped and technical requirements do not match what the market offers.
2. **Competition:** A small number of bidders shows that the contracting authority's procurement is not attractive enough to the market. The problem may lie in potential bidders' limited awareness of planned procurement, short timelines for clarifications and bid submission, or unclear descriptions of the procurement item, payment terms, etc.
3. **Openness:** This indicator is affected by lots that were disqualified or drew many questions or claims. Tenders with disqualifications or numerous questions should be identified and their causes analyzed. It is also worth **checking whether bidders need more detailed instructions or clarifications of the stated requirements**.
4. **Rule compliance:** It is important to **comply with the law in procurement** to minimize confirmed violations found by State Audit Service of Ukraine monitoring and complaints upheld by the Antimonopoly Committee of Ukraine. A high number of recorded violations undermines market trust in the contracting authority's procurement and affects all of the preceding indicators.

These indicators for a city's organizers can be viewed directly in the Contracting Authority Index tool. More detailed descriptions of each indicator and recommendations for improving them are available at the link. To improve procurement, **more active engagement with the market – through consultations and discussions with businesses** – is also needed.

→ To independently analyze the performance of the units, enterprises, institutions, and organizations subordinate to the city council, create and maintain a contracting authority hierarchy in the BI Prozorro analytics module. The instructions are available [here](#). This lets you view detailed metrics for the entire hierarchy and for each individual contracting authority in one place, and identify problems in good time. Ultimately, it will help improve the quality of procurement by individual contracting authorities and across the community as a whole. We also recommend publishing the hierarchy of contracting authorities subordinate to the city council in a dedicated public procurement section.

In asset management:

→ **Use the Handbook for Local Self-Government Bodies from** Prozorro.Sale **team to optimize privatization, leasing, and land auctions.**

→ **Analyze the level of competition** in different types of auctions: privatization or lease of municipal property and land plots. The ability to attract more bids depends largely on the **quality of lot preparation and auction publicity**. To improve these elements, **start by updating and publishing information on property available for privatization or lease**. This can encourage potential buyers and tenants to initiate auctions. Next, prepare detailed descriptions of objects with photos and realistic starting prices, and **publicize auctions more actively** on city council websites and other platforms.

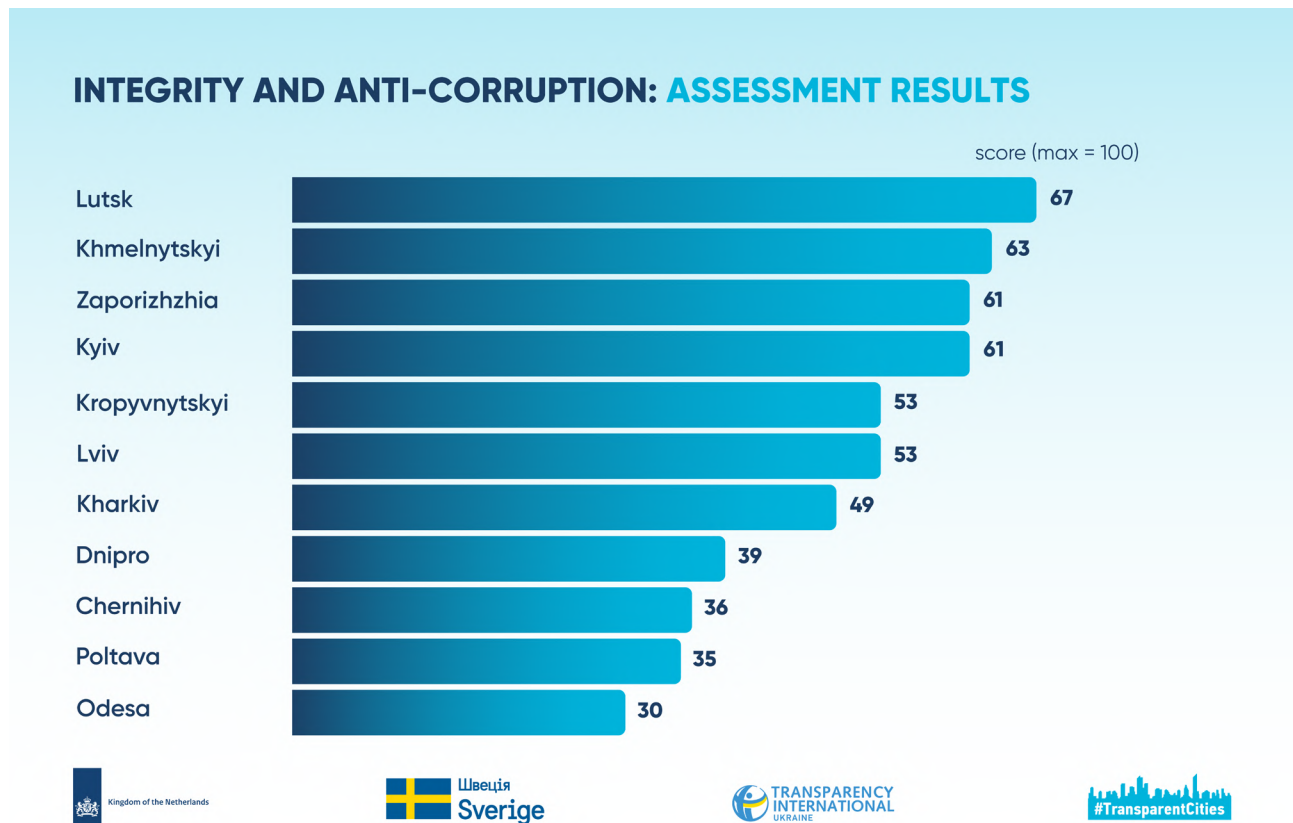
- **Step up and improve work with land auctions.** Land auctions can become an important source of local budget revenue, so the existing **List of Land Plots Subject to Lease or Privatization should be reviewed and auctions held through the electronic system**, following the detailed recommendations.

 [Read more](#)

Integrity and anti-corruption

Brief conclusions

The average implementation rate for the Integrity and anti-corruption block is **49.7%**, indicating a less developed integrity system compared to openness. The Integrity and anti-corruption results are lower than those of the Openness and E-services blocks; however, given the specifics of the e-services assessment, it can be argued that, to date, cities have made confident progress only in openness.

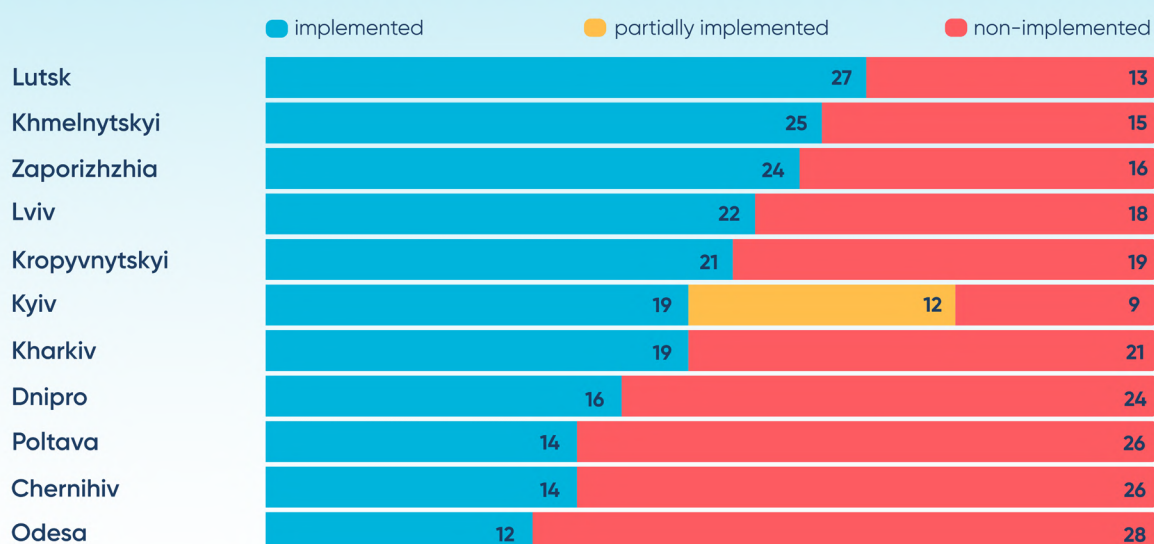


The 11 cities analyzed have very different levels of development in the integrity sphere. The gap between the highest and lowest city scores is 37 points. This can be explained by the fact that authorized bodies in some city councils make targeted efforts to give citizens the most convenient possible access to documents and materials on anti-corruption practice and ethics violations, while other city councils take no such steps at all.

The leaders – Lutsk, Khmelnytskyi, and Zaporizhzhia – earned their positions by creating dedicated anti-corruption sections on their official websites and publishing current (as of 2025) documents defining their anti-corruption policy. These websites contain complete or nearly complete information about the authorized units responsible for preventing and detecting corruption. The cities were actively involved in NACP tools: top officials filed their annual declarations for 2025 on time, and the municipalities and at least 10 municipal institutions were connected to the Unified Whistleblower Reporting Portal. Council members and officials of these city councils appeared rarely or not at all in databases of anti-corruption law violations in 2025.

In 2025, nearly all cities ensured the full functioning of bodies responsible for corruption prevention and compliance with ethical conduct standards. In 10 of 11 city councils, the functions of the authorized corruption prevention and detection officer were performed by specially established units. In 9 of 11 cities, the standing committee responsible for council member ethics and anti-corruption held meetings. **The staffing levels of corruption prevention and detection units did not affect the scores city councils received.**

INTEGRITY AND ANTI-CORRUPTION: BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



Nearly all local self-government bodies applied the “single point of entry” principle, an element of European governance. These single points of entry took the form of either dedicated anti-corruption sections on official websites or pages of the authorized corruption prevention and detection units. Lviv was the only city to combine anti-corruption and ethical conduct in a single point of entry, where the authorized unit is called the **Integrity and Corruption Prevention Sector**.

Representatives of the municipalities studied rarely appeared in violation databases last year. HACC convictions and negative results of full declaration audits or of monitoring compliance with conflict of interest legislation did not affect officials or council members in Zaporizhzhia, Kropyvnytskyi, and Luts'k at all.

However, analysts must note that city **councils' work on integrity is unsystematic and somewhat chaotic and only partially meets EU integration requirements.** Only 3 of 11 cities had corruption risk registers and anti-corruption programs in place in 2025; 6 of 11 councils followed approved Codes of Ethics/Rules of Ethical Conduct for officials and employees of executive bodies; and 3 of 11 cities had their own Codes of Ethics/Rules of Ethical Conduct for council members. Khmelnytskyi City Council was the only local self-government body to demonstrate all of these tools for building an integrity environment.

Only 2 of 11 city councils – Kropyvnytskyi and Kharkiv – took the steps needed for the whistleblowing system to work effectively. These cities have approved regulations on whistleblower incentive mechanisms and procedures for handling corruption reports. The city councils, along with at least 10 municipal enterprises and 10 municipal institutions, are connected to the Unified Whistleblower Reporting Portal, and website users can find a link to the portal in the relevant thematic section.

The **most problematic area revealed by the study was the near-total absence of monitoring results on the current integrity situation from city council websites.** Authorized city council bodies should collect and publish the results of checks on non-filing or late filing of declarations by declarants, information on conflict of interest notifications by officials and council members, records of officials and council members held administratively or criminally liable for corruption offenses, and the outcomes of reviews of reports on ethical conduct violations. Without this information, local self-government bodies and the public cannot track trends in corruption and ethics violations or draw conclusions about whether corruption risks are decreasing or being eliminated. Yet in 2025, **Kyiv** was the only one of the 11 cities to publish some of these monitoring results.

Program recommendations

The program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account, specifically by:

- **Familiarize themselves with the Model Anti-Corruption Program for a Local Council** presented by the NACP – a tool offering an approach to managing corruption risks at the community level.
- **Set up a working group to analyze the community environment and assess processes where corruption risks may arise.** This involves understanding how decisions are made, how different units interact, how resources are distributed, how municipal, social, and administrative services are provided, and so on. **Build a corruption risk register.**
- **Define key performance indicators for integrity work** that reflect real process changes and reduced corruption risks. These may include introducing clear procedures and responding promptly to reports of possible violations; introducing digital solutions and connecting local self-government bodies to NACP online resources; reducing the number of violations detected during inspections, and so on.
- If resources allow, even where not directly required by law, **develop and approve their own Anti-Corruption Program.**
- **Develop and approve a Code of Ethics/Rules of Ethical Conduct for council members.** Include in this document, or approve by a separate decision, a procedure for receiving and reviewing reports of violations of the Code/Rules.
- **Develop and approve a Code of Ethics/Rules of Ethical Conduct for officials and employees of the council's executive bodies.** Include in this document, or approve by a separate decision, a procedure for receiving and reviewing reports of violations of the Code/Rules.
- **Connect the city council/its executive committee to the Unified Whistleblower Reporting Portal.** Also, monitor the connection of the city council's municipal enterprises and institutions to the portal.
- **Create a dedicated thematic section on anti-corruption and ethical conduct on the official city council website.** The section may consist of the following pages: Regulatory Framework, Responsible Bodies, Financial Control, Conflict of Interest, Whistleblowers, Liability for Corruption and Corruption-Related Offenses, Ethical Conduct, Training, Plans and Reports.
- **On the Responsible Bodies page, publish links to the pages of:**
 1. The standing committee responsible for council member ethics and anti-corruption.
 2. The authorized corruption prevention and detection unit (officer).
 3. The commission for assessing corruption risks in the city council's activities.

- ➔ Regularly publish the relevant results of monitoring the current integrity situation on the Financial Control, Conflict of Interest, Whistleblowers, Liability for Corruption and Corruption-Related Offenses, and Ethical Conduct pages, including:
 1. Results of checks on non-filing or late filing of declarations by declarants.
 2. Information on conflict of interest notifications by city council officials.
 3. Information on conflict of interest notifications by city council members.
 4. The percentage of municipal enterprises connected to the Unified Whistleblower Reporting Portal.
 5. The percentage of municipal institutions connected to the Unified Whistleblower Reporting Portal.
 6. A list of city council officials held liable for corruption or corruption-related offenses.
 7. A list of city council members held liable for corruption or corruption-related offenses.
 8. Outcomes of reviews of reports on violations of the Code of Ethics/Rules of Ethical Conduct by council officials and employees.
 9. Outcomes of reviews of reports on violations of the Code of Ethics/Rules of Ethical Conduct by council members.

- ➔ On the **Plans and Reports page** of the dedicated section on anti-corruption and ethical conduct, **add links annually to:**
 1. The work plan and report of the standing committee responsible for council member ethics and anti-corruption.
 2. The work plan and report on implementation of measures under the Anti-Corruption Program/ Plan of Measures to Prevent Corruption Offenses.
 3. The work plan and performance report of the authorized corruption prevention and detection officer.
 4. The authorized corruption prevention and detection officer's report on the Integrity Portal.

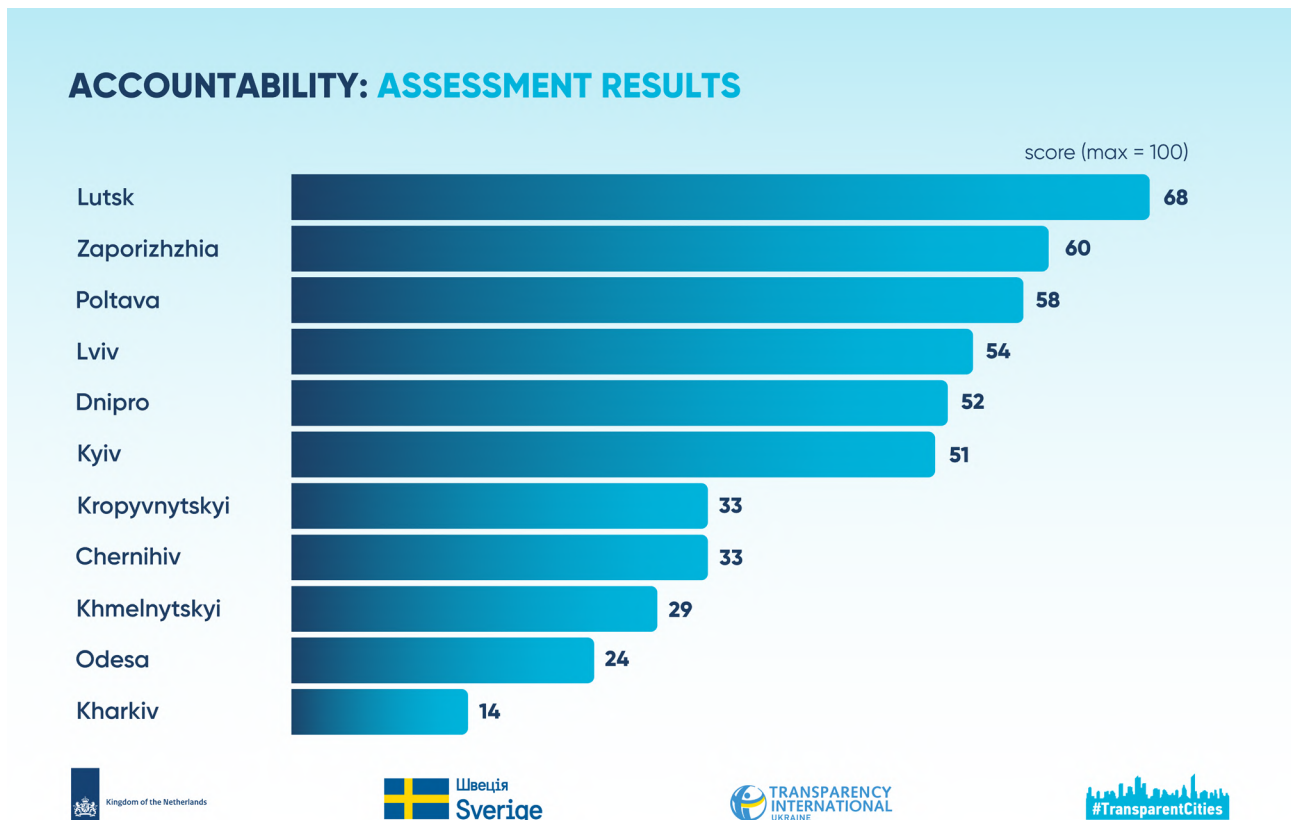
 [Read more](#)

Accountability

Brief conclusions

The average implementation rate across the 40 indicators of the Accountability block is **43.3%**.

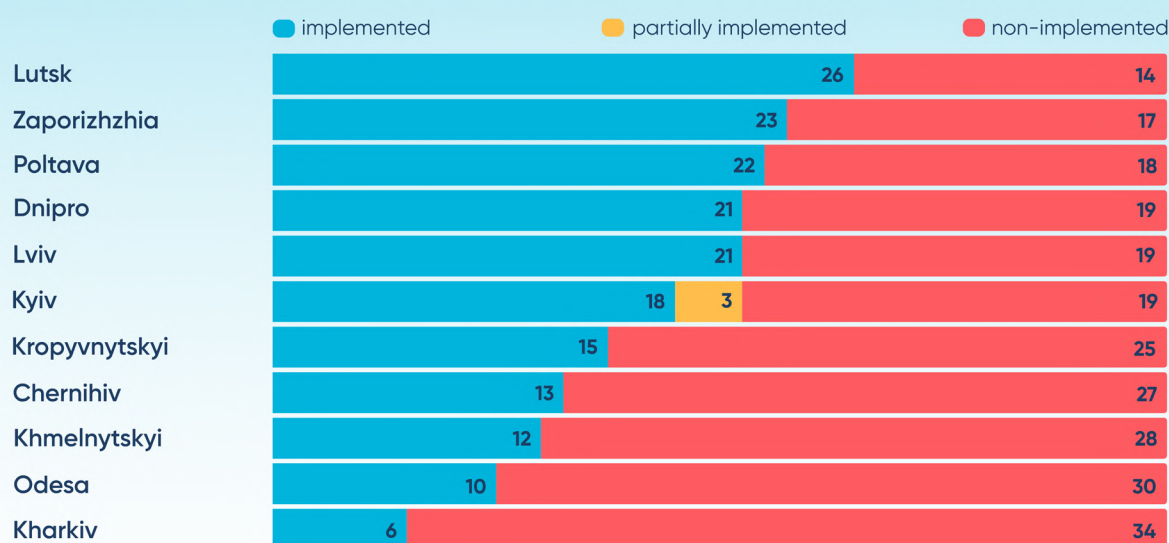
Lutsk achieved the highest result – 68 out of 100 points. One position lower is Zaporizhzhia with 60 points, followed by Poltava with 58 points. The lowest scores were recorded in Kharkiv (14), Odesa (24), and Khmelnytskyi (29).



This block produced the most uneven results: the gap between the highest and lowest scores was 54 points, the largest among all six Euroindex subindices. Such deep gaps between cities point to **a lack of systematic approaches to accountability by local authorities**. The wide spread can also be explained by fundamental differences between indicator groups: some checked for formal documents, others for external communication of reports, and the rest for simulated direct interaction between authorities and residents.

The results show convincingly that **city councils do not see accountability as an area worth investing communication resources in**. Reporting is not yet treated as an integral part of the management cycle. It is either a formal requirement or, less often, a PR tool during high-profile mayoral appearances. Because of this narrow approach, municipalities systematically miss the chance to explain their work to the community and highlight aspects of it that usually remain invisible to residents. And this at a time when public trust in local authorities is low.

ACCOUNTABILITY: BREAKDOWN OF IMPLEMENTED AND NON-IMPLEMENTED INDICATORS



Occasional successes in covert checks point to a **need to streamline public engagement**. For now, a resident's experience with the city council is a matter of chance – the mood of a particular staff member or the council's ability, in that moment, to handle your request, rather than someone else's, promptly and properly. The cities that did well in the program's first round of covert checks last year are not the same ones that performed well in this study. Clearly, sustainable mechanisms for engaging with the community are either not embedded in city council rules and procedures or not properly enforced.

Program recommendations

In light of these findings, the program recommends that all cities (not only those included in the pilot sample) take the analytical findings into account and focus on the following systemic solutions:

- **Institutionalizing annual reporting.** Define a reporting calendar, responsible persons, clear deadlines, and standards for publishing and publicly presenting reports.
- **Regulating approaches to engaging with citizens through existing communication channels.** Set rules and assign responsibility for handling requests for public information, calls to the city hotline and to structural units' office numbers, social media comments and messages, and so on. The aim is to make residents' experience of dealing with the authorities consistently positive.
- **Following the management cycle "plan → implementation → report → feedback → adjustment."** Do not cut off the life cycle of processes and decisions at the implementation stage. This is especially important when implementing strategies, city targeted programs, and policies. The community should see clearly documented results, and those making further decisions on a given issue should be guided by the outcomes and feedback when adjusting their next steps.

- **Investing in stronger communication capacity in councils.** Train staff to turn reports into communication products that become meaningful newsworthy items initiated by the city council. We recommend starting with the advice of the program's communication [experts](#) and [analysts](#) on building effective dialogue with residents.

In addition, we urge cities to implement the following practical recommendations:

- **Populate thematic sections on official city council websites with reporting documents.** Review the structure of city council web resources and give users access to permanent thematic sections that collect and regularly update reference information with correct links to documents. This applies in particular to sections on the local budget, corruption prevention and anti-corruption, regulatory policy, humanitarian aid, and more. Reports of the mayor, council members, standing committees, executive bodies, and municipal enterprises should also be placed logically, alongside all other relevant information on their activities.
- **Publish the results of monitoring the implementation of strategic documents.** Ensure mandatory publication and dissemination of reports on monitoring the implementation of the territorial community development strategy, as well as reports on the implementation of the socioeconomic development program and other strategic planning documents.
- **Regularly inform the public about progress on current targeted programs/action plans.** Always publish such information in a logical place – a dedicated section on city targeted programs or the relevant thematic pages. For example, a link to the progress report on the action plan for implementing the National Barrier-Free Strategy logically belongs in the section on barrier-free accessibility.
- **Hold open reporting meetings between the mayor and the community twice a year.** When preparing such events, the city council must ensure the essentials: an announcement published at least 24 hours in advance, ideally seven or more days; publication of the mayor's written report no later than seven days before the meeting; and an online livestream with the video recording kept publicly available. It is also worth checking whether the Charter of the territorial community contains an updated provision on holding the open meeting specifically twice a year, and making sure residents can ask the mayor questions before and during the meeting in various formats (online form, comments under the livestream, questions from the floor, etc.).
- **Publicly present the report on the previous year's budget execution.** The event should always be announced separately to the community, even if the report is presented at a city council session or executive committee meeting. The announcement should include a link to the written budget execution report and a link to the livestream of the event/meeting.
- **Ensure proper publication of reporting-related open datasets.** Note that the dataset "Reports, including on the fulfillment of requests for information" should contain data on all city council reports, not only those on fulfilling information requests. Also bear in mind that the dataset "Information audit results" should include data on the types of information held by the city council, as identified by the annual audit, rather than links to written audit reports. Review the Ministry of Digital Transformation's recommendations for dataset publication (update frequency, resource names, resource formats, etc.) in detail and follow them.

 [Read more](#)

