BETWEEN SECURITY AND TRANSPARENCY

A STUDY OF WORK ORGANIZATION OF CITY COUNCILS DURING THE WAR

Transparency International Ukraine is an accredited chapter of the global movement Transparency International, with a comprehensive approach to the development and implementation of changes for reduction of corruption levels. TI Ukraine launched the **Transparent Cities program** in 2017. It aims at overcoming corruption at the local level and promoting the best practices of transparency and accountability.

The program annually compiles the Transparency Ranking of 100 Largest Ukrainian Cities. Over five years, the average transparency of cities has increased by 62.2%. Within the framework of the program, the Accountability Ranking of 50 Ukrainian Cities is also formed, which shows the actual state of accountability of local authorities. The average accountability of cities according to the results of 2021 is 16.5 points. Based on the ranking results, program experts provide recommendations and advise city councils on the implementation of best practices of transparency and accountability of local authorities. The studies of transparency and accountability are complementary and demonstrate a comprehensive level of openness of local self-government bodies.

In 2020, an online platform "Transparent Cities" was created, aimed at promoting an effective dialogue between the authorities and the community.

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BETWEEN SECURITY AND TRANSPARENCY:

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The war affected all Ukrainian cities and towns. The full-scale russian aggression takes away lives, destroys destinies, causes damage to infrastructure, culture and, of course, local self-government. This is a serious challenge. Local authorities in its modern decentralized form have not yet dealt with the problems that Ukraine now faces.

The Transparent Cities program (Transparency International Ukraine) has assessed transparency and accountability annually since 2017. But the war has changed everything, and our program is no exception. The perception of all victories, as well as priorities and challenges, has changed. For the first time, the team used a conceptually different approach.

This year, we have conducted an adapted study of transparency of Ukrainian cities in war conditions. Currently, our rear cities are trying to balance between transparency and security, and the occupied and frontline ones are trying to survive. Thus, in 2022, the team evaluated only 70 cities out of the usual 100 and did so according to the updated criteria. Instead of points and ranks, we now have the status of the city and the level of indicators' implementation.

We are convinced that it is important to continue analyzing cities because transparency is an integral part of democratic governance and economic stability. At the same time, this year's study is not only a confirmation of the existing status of cities, but also a detector of unexplored areas. The team, among other tasks, also set out to identify general trends and advise local authorities on ways to improve.

On June 27, 2022, Ukraine was granted the status of a candidate for EU membership. This has reinforced the unquestionable need to continue the reforms that were initiated and to promote the principles of good governance locally and the fight against corruption. In order for Ukraine to get closer to EU membership, it is necessary to meet European standards not declaratively, but to work for the realization of the set goals.

An important prerequisite for cooperation with international partners in the reconstruction process is the very transparency and accountability of the authorities. This directly influences the investment and implementation of joint projects, in particular, the ones concerning reconstruction.

One should remember that before the full-scale war, Ukrainian cities showed a decent result. And the Transparent Cities team encouraged them to introduce positive changes, helped in implementation, and recorded progress. For five years, 100 Ukrainian cities competed for the primacy in transparency and accountability. Local authorities and active community worked to improve their cities, set ambitious goals, and achieved them.

In the 100 largest cities, the average level of transparency increased by 62.2% during 2017–2021. Significant progress was achieved in the openness of data — Ukraine was considered one of the world leaders in this sphere.

Transparency, among other democratic values, is our undeniable advantage over the enemy. It is a weapon that makes us stronger, more resilient, and more effective.

That is why we must continue to work on the transparency of local authorities to preserve the already achieved results and to achieve even more after the victory.

Research Methodology

Transparency is understood as a state in which citizens are provided with the right and possibility to have access to information, and local self-government bodies (hereinafter referred to as LSGBs), aware of the importance of opening up information and engaging the public, are proactive in this process. It is also a factor that contributes to more effective municipal governance in crisis situations.

To determine the level of transparency of local self-government bodies under martial law, the Transparent Cities program developed a new assessment methodology.

The methodology contains 40 criteria related to the organization of work of city councils during the martial law, publication of information on official resources, providing access to data on land and housing issues, municipal property, social sphere, etc. Some criteria relate to the creation of opportunities for internally displaced persons (IDPs) and relocated businesses, the publication of information on humanitarian assistance received, the location of shelters, etc. Most of the indicators studied are the functional responsibilities of city councils and their executive bodies.

The study of the city transparency was conducted by analyzing the official and specialized websites of city councils, subordinate divisions, departments, and enterprises. In some cases, information was checked in local and national media. The analysis covered the period of activity of local authorities from March to December 2022.

The study involved 70 largest cities of Ukraine from 18 oblasts — Vinnytsia, Volyn, Zhytomyr, Zakarpattia, Ivano-Frankivsk, Kyiv, Kirovohrad, Lviv, Odesa, Poltava, Rivne, Sumy, Ternopil, Dnipropetrovsk, Khmelnytskyi, Cherkasy, Chernivtsi, Chernihiv.

The cities of Mykolaiv, Kherson, Zaporizhzhia, Donetsk, Luhansk, and Kharkiv oblasts were not included in the study because during 2022, they were either in the combat zone, under temporary occupation, or encircled (blocked). In addition, the Ministry of Digital Transformation of Ukraine recommended not to publish open data of these regions on the Open Data Portal data.gov.ua.

Table 1. Transparency scale depending on the final result of indicator implementation

City category		Explanation
🔵	Transparent city	The level of indicator implementation by the city council is 75% or more
🔵	Partially transparent city	The level of indicator implementation by the city council ranges from 50% to 74%
🔵	Non-transparent city	The level of indicator implementation by the city council is 49% or lower

For more information about the algorithm for determining the city category by the number of fulfilled criteria, see Annex No. 2.

Moreover, the study did not measure the transparency of four city councils of the Dnipropetrovsk Oblast — Kryvyi Rih, Pokrov, Nikopol, and Marhanets, since these cities are located close to the zone of active hostilities. Before the liberation of the right-bank part of the Kherson region, Kryvyi Rih was under regular shelling, and Pokrov and Nikopol as of December 2022 are being shelled from the temporarily occupied parts of the Zaporizhzhia Oblast.

Key findings of the study:

- Despite russia's full-scale invasion of Ukraine, the local self-government bodies have shown resilience. In 2022, three cities are in the category of "transparent" in the context of the war — Dnipro, Lviv, and Mukachevo. Another ten cities (Vinnytsia, Volodymyr, Zhytomyr, Kamianske, Kyiv, Kropyvnytskyi, Lutsk, Ternopil, Uzhhorod, Chernivtsi) are "partially transparent." The rest of the cities (57) are "non-transparent."

- The average indicator implementation of 70 cities is 37.5%. Indicators that constitute the requirements of Ukrainian legislation show higher level of implementation. Among them is the publication of decisions of the city council, the executive committee, and officials; ensuring the submission of an electronic request for public information.

- Most cities have adapted official sites and applications to wartime requirements: local authorities published relevant information for internally displaced persons (hereinafter referred to as IDPs) and lists of civil protection shelters, communicated algorithms for receiving monetary compensation for accommodating IDPs.

- Cities that were relatively transparent in their work before the introduction of martial law showed higher level of transparency in 2022.

- The least implemented indicators are those that require significant resources, special digital skills and/or the ability (including financial) to ensure constant implementation (electronic auctions or the streaming of meetings).

- The low level of transparency of individual cities does not always indicate their lack of integrity or corruption risks. This could be affected by a number of factors related to wartime restrictions — the suspension of the work of national portals, such as the Open Data Portal; the lack of necessary resources for the implementation of certain indicators (primarily those related to security); interruptions in the supply of electricity and communications and, accordingly, difficulties in publishing content on official websites; the difficulty of resuming the full-fledged work of local self-government bodies in the de-occupied territories, etc.

This study aims to highlight priority policies and services for implementation, to show the best practices of transparency in management processes at the local level, and to stimulate the exchange of experience. The results of the study will be of interest primarily to the local self-government authorities responsible for the level of transparency, as well as to managers / initiative groups in a certain area (access to public information, open data, integration of IDPs, etc.).

Cities and War: Results of the Study

Among the 70 cities studied, only three — **Lviv, Dnipro, and Mukachevo — have the status of "transparent."** Ten city councils are in the category of "partially transparent" — Vinnytsia, Volodymyr, Zhytomyr, Kamianske, Kyiv, Kropyvnytskyi, Lutsk, Ternopil, Uzhhorod, and Chernivtsi. 57 cities are recognized as "non-transparent."

To objectively perceive the results of the study, it is necessary to consider the context in which the local self-government bodies had to work:

1. **Unprecedented scale of damage and destruction.** As of December 2022, according to analysts of the Russia Will Pay Project (KSE Institute), the total amount of direct documented damage to Ukraine's infrastructure due to the full-scale invasion is about USD 137.8 bln. The losses caused by the destruction of the housing stock amount to USD 54 bln. For more than ten months of the full-scale war, a total of 149,300 residential buildings were damaged or destroyed. And it was the executive committees of the city council that were responsible for organizing and coordinating urgent works on the restoration of buildings.

2. **Damage to critical infrastructure.** Since October 2022, russia has been trying to destroy Ukraine's energy system, leaving cities without electricity, heating, water, and communications. The lack of regular access to the Internet and electricity was among the challenges. As of January 2023, the country's energy system had survived 12 enemy missile attacks and 14 UAV strikes on power facilities.

3. **Migration crisis.** As of October 2022, 6.5 mln IDPs were recorded in Ukraine. For local authorities, this meant additional work to adapt people to a new place of residence, promote their employment, and provide benefits that apply to other residents. Thus, according to the mayor of Lviv, in the first month of the invasion, the city with a population of 800,000 people grew to two million people. In total, about 5 mln people passed through Lviv.

4. **Sharp change of priorities.** Redistribution of human and financial resources in support of defense capability, social security, restoration of infrastructure, etc.

5. **Difficulty of restoring control in the de-occupied territories.** The city authorities had to reestablish the work, first of all redirecting funds and efforts to restore housing and solve priority humanitarian problems (access to water, food, medical services). In some cities, due to enemy bombing, the buildings of the local self-government bodies were destroyed or damaged, so it was difficult to organize a meeting of the council.

The geographical factor had a limited impact on the state of transparency. Thus, Lviv managed to ensure a high level of transparency, despite the challenges associated with multimillion migration waves to the western part of the country and a noticeable increase in the burden on city agencies. Despite the systematic missile attacks of russian occupiers in the eastern direction,

TRANSPARENT	Dnipro	Lviv	Mukachevo	

PARTIALLY TRANSPARENT	Vinnytsia	Volodymyr	Zhytomyr	Kamianske
	Kyiv	Kropyvnytskyi	Lutsk	Ternopil
	Uzghorod	Chernivtsi		

NON-TRANSPARENT	Berdychiv	Bila Tserkva	Bilhorod-Dnistrovskyi	Boryspil
	Boyarka	Brovary	Varash	Vasylkiv
	Vyshneve	Horishni Plavni	Drohobych	Dubno
	Dunaivtsi	Zhmerynka	Zhovti Vody	Zviahel
	Ivano-Frankivsk	Izmail	Irpin	Kalush
	Kamianets-Podilskyi	Kovel	Kolomyia	Konotop
	Korosten	Kremenchuk	Lubny	Myrhorod
	Netishyn	Nizhyn	Novovolynsk	Novomoskovsk
	Odesa	Oleksandriia	Okhtyrka	Pavlohrad
	Podilsk	Poltava	Pryluky	Rivne
	Romny	Sambir	Svitlovodsk	Slavuta
	Smila	Starokostiantyniv	Stryi	Sumy
	Uman	Fastiv	Khmelnytskyi	Chervonohrad
	Cherkasy	Chernihiv	Chornomorsk	Shepetivka

Dnipro is also transparent in the work of local authorities. The relatively high level of transparency is also demonstrated by Kropyvnytskyi, a city of regional significance in the central part of the country, which remains one of the most important humanitarian centers of Ukraine. Mukachevo, a city with a population of about 85,000 people, demonstrates that the size of the settlement is not a defining feature for ensuring transparency.

TRANSPARENCY INDICATORS: IMPLEMENTATION RESULTS

The state of city transparency in martial law is determined by the implementation of indicators required by Ukrainian legislation and indicators that are best practices of good governance[1] in the areas of access and participation, security policies, electronic tools, etc. When determining the best practices, the six-year experience of the program's interaction with local self-government bodies, specialized civil society organizations, and active residents of the 100 largest cities of Ukraine was considered. Some indicators are the requirements of treaties and obligations signed by Ukraine, such as the UN Convention on the Rights of Persons with Disabilities, according to which States Parties undertake to provide access to public information to citizens

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[1] The principle and model of public administration, which focuses on the implementation of the powers of public authorities and local self-government in close cooperation with the public and all stakeholders to solve problems and requests of the community: https://www.slg-coe.org.ua/wp-content/uploads/2018/11/Book_BenchmarkingDV-2_148x210_web.pdf

with disabilities. The methodology also considers the exemplary practices that have already been implemented in a number of Ukrainian cities to increase the convenience and accessibility in the use of urban services.

Cities in general are more active in implementing indicators that are legislative requirements — the average rate of their implementation is 47.8%. Local self-government bodies implement those indicators that are best practices[2] by 27.8%, and those that combine the requirements of the law and best practices — by 38.7%.

Some of the best-implemented indicators by the cities during the war showed a high rate of implementation before the full-scale war. For example, according to the Transparency Ranking

Table 2. Five best implemented indicators in cities during the martial law

Name of indicator	*Law requirement / best practice / law requirement and best practice*	*Number of cities that have fully implemented the indicator (out of the 70 studied)*
C29: Is it possible to send a request for information, an appeal, or a letter to the council, its bodies, using the Internet, electronic means of communication?	Law of Ukraine "On Citizens' Appeals";	70
C38: Is the following information published on the official website of the city? a) the decision of the city council; b) the decision of the executive committee.	Law of Ukraine "On Local Self-Government in Ukraine," Law of Ukraine "On Access to Public Information"	58
C17: Are decisions, agreements, orders*, adopted by the mayor alone, published on the official website of the city council? ** Except for information that, in accordance with Article 6 of the Law of Ukraine "On Access to Public Information," has the status of "limited access."*	Law of Ukraine "On Local Self-Government in Ukraine," Law of Ukraine "On the Legal Regime of Martial Law"	54
C04: Is the list of open data sets to be posted by the city council, executive bodies, and legal entities financed from the city budget, published?	Regulation on data sets, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 835 dated October 21, 2015. The requirement to update the list every six months is best practice.	51
K25: Has the *up-to-date list* of civil protection shelters been created and published on the official or other specialized website of the LSGB?	Regulation on data sets, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 835 dated October 21, 2015. The requirement to update the list every six months is best practice.	49

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[2] The implementation of indicators is not provided for by regulatory acts and is an initiative of local self-government bodies designed to simplify access to information or services.

of the Transparent Cities program, in 2021, 67 of the 70 city councils studied provided the opportunity to send a request for information, an appeal, or a letter to the council online. Of the 51 city councils that published lists of open data sets during martial law, 44 had this information in 2021. Consequently, after February 24, 2022, cities did not have to implement new solutions or

Table 3. Five worst implemented indicators in cities during martial law

Name of indicator	*Law requirement / best practice / law requirement and best practice*	*Number of cities that have not fully implemented the indicator (out of the 70 studied)*
C39: Are the electronic auctions for the sale of rights to place seasonal trade objects and temporary structures for entrepreneurial activity conducted?	Best practice designed to promote a transparent property management process and reduce corruption risks; may be a source of additional revenues to local budgets.	65
C10: Do announcements of LSGB meetings contain: a) the date and time of the event; b) a link to the stream; c) a link to the agenda / list of issues?	Law of Ukraine "On Local Self-Government in Ukraine," Law of Ukraine "On Access to Public Information." Announcing the meetings of the executive committee, standing committees, and coordinating body is best practice.	62
C12: Is information available on the official or other website about residential premises owned by the community, which is updated at least once every six months, namely: a) the number of municipally owned residential premises that are leased or other right of use; b) the number of unused (vacant) municipally owned residential premises that can be transferred into use; c) the number of rooms in dormitories of municipal ownership?	Regulation on data sets, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 835 dated October 21, 2015. The requirement to update the information every six months is best practice.	60
C19: Are the meetings of the standing committees of the council streamed?	Best practice, which is necessary given the importance of the issues considered by standing committees.	60
C07: Are registers of land lease agreements concluded during March–December 2022 published on the official website of the city council or other specialized web resource?	Regulation on data sets approved by the Resolution of the Cabinet of Ministers of Ukraine No. 835 dated October 21, 2015, Order of the Ministry of Finance of Ukraine No. 783 dated September 17, 2015, "On Approval of the Form of the List of Lessees with whom Lease Agreements for State or Municipal Land Have Been Concluded." Publishing the date and number of the decision is best practice.	59

tools. The main task was to ensure the updating of data and the continuity of the already developed services or tools.

The indicators that have a lower percentage of implementation are those that require significant time, financial, human resources and/or are technologically difficult to implement, for example, providing online streaming of local government meetings or conducting electronic auctions for the sale of rights to place seasonal trade objects. Moreover, the implementation of these indicators is not regulated by law, but is a good practice.

In addition, after the introduction of martial law, the sphere of access to public information generally regressed. Referring to security risks, cities suspended the work of official portals or restricted access to certain sections or pages. Thus, local self-government bodies generally stopped publishing announcements of meetings so that the enemy did not know about the time and place of the gathering of local administrators. The level of implementation of individual indicators was also affected by the closed Open Data Portal in February 2022, where municipalities, among other things, had published data on residential premises owned by the community and leased land plots.

Before the full-scale war, the housing sector was traditionally one of the least transparent, according to [the assessment](#) of the Transparent Cities program (2017–2021). This practice has persisted.

Due to wartime restrictions, ***certain areas lost their priority in the work of local self-government bodies***. However, they could significantly improve the ability of city councils to respond to the challenges of war — humanitarian crisis, mass displacement of population, accounting and rational use of available resources, and support for the economic situation. For example, such a policy envisages maintaining a transparent record of housing of municipal ownership with the published housing wait list and providing a mechanism for registering housing (electronic registration system), as well as the availability of a convenient electronic system for ordering social services with the possibility to track one's position in the wait list.

City Transparency Before and During Full-Scale War

Over the five years of the [Transparency Ranking](#) (2017–2021) of the Transparent Cities program, the average indicator of the 100 largest cities in Ukraine increased by 62.2%. Previous achievements could contribute to the resilience of cities and the effectiveness of governance at the time of the full-scale invasion of russia:

- information on housing of municipal ownership would make it possible to understand the volume of housing needed to accommodate IDPs;
- information on real estate registered with the city council would indicate the ability to relocate enterprises from hot spots;
- the list of institutions and services of social assistance would help assess the possibilities to meet the needs of the population for the duration of martial law;
- availability of electronic services for registration of compensation for accommodation of IDPs, housing registration, ordering social services — would significantly simplify the adaptation of IDPs in new places of residence.

This study of the state of city transparency in war conditions is not a linear continuation of the [Transparency Ranking](#). Methodologies differ significantly in the scales of assessment and have a different number of indicators. At the same time, most of the criteria that had been assessed before the full-scale war remained the functional duties of the local self-government bodies for the duration of the martial law. This allowed the program team to record the main changes in the work of the local self-government bodies of the studied cities.

There is a connection between the level of transparency of 70 cities before and after the introduction of martial law. Pearson Correlation Coefficient between the city's level of transparency as of December 2022 and its indicator in the Transparency Ranking 2021 is 0.8%. This indicates a high positive correlation. ***In other words, cities that were relatively transparent in their work before the introduction of the martial law showed higher transparency rate in 2022.***

According to the results of the Transparency Ranking in 2021, [five cities](#) are in the category of≈transparent — Mariupol, Lviv, Dnipro, Drohobych, Mukachevo. In the study of city transparency in war conditions, three of them are also classified as transparent — Lviv, Dnipro, and Mukachevo.

Due to the temporary occupation, Mariupol does not participate in the study — the city council cannot exercise its powers at the moment. Instead, Drohobych changed its status and is in the category of "non-transparent" cities. During 2022, the city council did not update information on time. At the time of the study, there was no up-to-date information for 8 out of 16 non-implemented indicators. On the bright side, during the period of martial law, the city managed to maintain or implement complex technological solutions, such as electronic tools for obtaining social, housing, educational services or responding to problems in the field of housing and municipal services. The city has a version of the official website for people with low vision. Meetings of collegial and advisory bodies are also announced.

Adaptation to war:
best practices of transparency

63 out of 70 cities **publish information on civil protection shelters**. 49 city councils have updated such information over the past six months. The other 14 municipalities did not do this, i.e., they need to update the data.

As of early 2022, civil protection structures could provide shelter for no more than 10% of the country's population. There have been cases when an object included in the list could not be used as a shelter or access to it was limited. However, the great war has actualized the need for the registration of shelters and their organization. The local authorities faced the need to add or update such data on official web resources.

Some municipalities **not only published lists of shelters**, but also **ensured that these data were put on the geoportal of the city or a map on the Google Maps platform**, such as Chernivtsi, Kamianets-Podilskyi, or Cherkasy city councils. Such visualization of information allows residents to conveniently determine which shelter is closest to them, from which type of damage it can protect, its open hours, and whether unhindered access to it is ensured. In addition, each of the types of protective structures has accompanying information about the balance holder, and sometimes their contact details. Therefore, in case of inaccessibility of the shelter or its inappropriate condition, citizens can file a complaint demanding to solve the problem.

Such maps are quite popular among residents. For example, in Kamianets-Podilskyi, the map was viewed almost 700,000 times, although the population of the city is about 100,000 people. Ternopil City Council created **a map with shelters and integrated it into a special application** "E-Ternopil." Here you can see a list of protective structures by type (anti-radiation, the simplest ones (basements), shelters at stops), their capacity, Internet access, open hours, or availability of a bathroom. In addition, during an air raid alert, the app offers a route to the nearest shelter.

The rapid migration crisis provoked by the russian attack has led to millions of Ukrainians being out of their usual environment and being forced to change their permanent place of residence. Almost half of the studied city councils (34) **publish relevant information for IDPs on official portals** partially or fully. First of all, these are data on the issuance of humanitarian assistance, current employment opportunities, registration, as well as obtaining housing.

To facilitate IDPs' access to information, Dubno and Volodymyr city councils **created separate pages on the official website of the council**. They are placed in the top menu of the site, so the information is easy to find.

Some cities develop **separate sections for IDPs**, which, in addition to basic information (on available housing, humanitarian assistance, registration, and work opportunities), have data on nutrition, psychological and legal assistance, education, and entertainment. Such information, for

example, is published in [Rivne](#) and [Kropyvnytskyi](#), where every tenth citizen is a displaced person. In both cities, there are about 25,000[3] IDPs, and the population as of January 1, 2022, was [220,000](#) in Kropyvnytskyi and [244,000](#) in Rivne.

Cities use Telegram channels as a means of communication with IDPs. For instance, the City Council of Oleksandriia has a [channel](#) with updated information about housing, employment and receiving aid, with about three thousand subscribers. The number of IDPs registered in the community is over [10,000 persons](#), i.e., about a third of them receive information from this resource.

City councils **publish up-to-date information for people who have provided accommodation to IDPs**. 27 cities have published information or document templates on official websites to receive compensation for accommodating IDPs, or addresses and mechanisms to file such applications. 15 city councils publish both types of data. For example, the Sumy City Council detailed information about [the place for filing applications and the applications themselves](#) on the website of the Department of Social Protection of the Population. In Kremenchuk, the [procedure of compensation](#) for accommodating IDPs and application templates are published on the website of the Administrative Service Center. The Chernivtsi City Council published information on its official website in the [News](#) section.

The housing issue in Ukrainian cities has exacerbated due to the mass displacement of the population and the destruction of homes and critical infrastructure. This has reinforced the relevance of the accounting and distribution of municipally available housing assets. **Many municipalities have not yet provided online wait lists and continue to use paper applications** without tools to further track their place in the wait list, increasing the risk of non-transparent housing allocation.

However, in [Khmelnytskyi](#), [Vinnytsia](#) and [Drohobych](#), there is a **resident profile with an integrated function to file an e-application for housing**. There are technologically simpler solutions, such as **electronic applications or Google forms on the websites of the city council or the administrative service center**, such as in [Dubno](#), [Ivano-Frankivsk](#), [Mukachevo](#), [Chervonohrad](#), [Bila Tserkva](#). Some cities, such as Kamianske and Dnipro, **use the national digital service portal [Igov](#)**, which can be used to apply for an apartment wait list. In some cases, **you can apply by filing documents and applications via email**, like in [Shostka](#). At the same time, the best way to use an electronic system is its integration with portals for publication of housing accounting data, when the filed information is reflected on the wait list alongside the documents with public access immediately following confirmation by the city council.

In 2022, three more cities introduced **an electronic application form for social services** or joined in on the use of existing tools, such as the Svoi chatbot by the Ministry of Digital Transformation. This includes [Kyiv](#), [Uzhhorod](#), and [Zviahel](#). In total, you can file an online application to receive social services at social security institutions in **19 cities**.

The [designated ministry](#) insists how important it is to digitize services, since the digitization of the social sphere allows for uninterrupted and unimpeded access to services and helps reduce the

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[3] https://t.me/vitalykoval8/9495,
https://www.facebook.com/kirovohradskaODA/posts/pfbid02A73BnRdUZLRrhT8fYWAA5A33jdUjoa77d6ZgaR1LmtkAu6utMWNuux4qwZtcBMpXl

workload of employees who interact with people in difficult circumstances. It is not necessary to create complicated tools; it would be enough to use simple solutions that would allow remote applications. For example, the Kamianske City Council has been using Google forms to collect requests for social services for a few years now.

Convenient feedback between citizens and municipal services is an essential guarantee of a prompt response to problems arising locally, especially now that russian shelling is causing significant damage to the housing and utility sector. The best form of implementation of such interaction is the development of platforms and their integration with municipal geoinformation systems. This provides for a visual representation of open / closed applications on the city map with all the accompanying information, including the essence of the complaint, the applicant, the current review status. For example, in Lviv, the city council uses a **_message map_** **_on its information portal, which includes all the registered complaints with the status of their implementation, responsible enterprise, the control date_**, etc. You can file a complaint in different ways — by phone, via website or social networks. Similar services operate in other Ukrainian cities — Odesa, Dnipro, Vinnytsia, Brovary, and Chernihiv. This system makes it convenient for city councils to analyze data on the most common types of appeals, the efficiency of the work of municipal enterprises, determine the most problematic areas of the city and, on this basis, form further evidence-based policies.

In addition, many city councils **_use the national_** **_Open City service_** on the E-Dem platform. Among them are Zhytomyr, Lubny, Kremenchuk and others. This platform is available to all city councils and only requires registration and regular work by the city to respond to appeals and maintain the service. It also publishes location-based statements and complaints to city institutions on the map. On the other hand, it publishes less metadata for further analysis than a response platform designed for a specific municipality. In cities where Open City-based platforms are implemented, the number of complaints and applications is usually lower than in cities with their own services.

Some city councils have applications in online forms not tied to specific services, providing the ability to track the status of the complaint or responsible institutions. There are options to file complaints via the city council website in Kalush, Oleksandriia, and Horishni Plavni.

Cities are also actively **_starting to use chatbots in social media to quickly receive applications and complaints_**. In particular, they use the Svoi chatbot in Telegram and Viber. It has 343 hromadas connected to it, with the application being most popular in Odesa, Vinnytsia, Poltava, and Volyn regions. The use of this tool contributes to better electronic accounting of applications and analysis of the most common problems.

It is important that **_municipalities support businesses_** by publicizing information about grants and training, the peculiarities of tax, land and regulatory policies, relocation opportunities, special programs, and support tools. About half of the cities (34) publish such information, regardless of population or region. For example, Nizhyn and Drohobych city councils have created special sections with up-to-date information, and Khmelnytskyi City Council has expanded the work of the "Hot Button for Business" project in areas related to doing business during martial law (tax policy, relocation, etc.).

The humanitarian crisis that arose after the start of the large-scale war provoked a flow of aid to Ukrainian cities. The scale of support is enormous: as of September 2022, almost [900,000 tons of aid](#) has been received and recorded. At the same time, cases of violations in the use of humanitarian aid and even its theft have become more frequent. Adequate reporting or aid distribution mechanisms have not been developed at either the national or local levels, in part because the legislation does not impose such responsibilities on city councils. Among the 70 studied cities, only five (Lubny, Lviv, Smila, Pavlohrad, Volodymyr) publish the **_criteria for issuing aid and interim reports on the received and distributed humanitarian aid_**. 17 other municipalities have either reports or developed criteria. [Drohobych](#) is the only city that published a consolidated annual report on the aid received, detailing it by category (food, medicine, transport, etc.). The report was published in January 2023, outside the period under study, so analysts did not take it into account when evaluating the city according to the respective indicator. At the same time, other localities can copy the practice of preparing this document.

Changes in the Situation with Access and Participation in Municipal Processes

After the full-scale invasion, there has been a **deterioration** in access and participation of city residents in municipal processes. A widespread restriction of access to information has become a mass phenomenon — meetings are held in a closed format; they are not announced, and official portals are suspended.

Considering the legislative regulation, Article 64 of the Constitution of Ukraine prescribes certain rights and freedoms of citizens may be limited under martial law. In particular, it can apply to the right to free collection, storage, use, and dissemination of information. According to the Resolution by the Cabinet of Ministers of Ukraine No. 263, local government agencies are recommended to suspend or restrict the work of information, communication and electronic communication systems, as well as public electronic registers.

These restrictions also affected the level of access and participation of residents. In some cities, all data on the portals was completely closed, in others — partially, guided by the authorities'own vision of what information the enemy can use for their purposes. However, since summer 2022, local councils started gradually restoring information on their official portals and social media pages.

In the explanation provided by the Ombudsman's Office, it is emphasized that the main grounds for restrictions should be *"protecting the interests of national security and territorial integrity or public order with the aim to prevent uprisings or crime."* In practice, this means that local authorities should apply the so-called three-part test provided for by Article 6 of the Law of Ukraine "On Access to Public Information," i.e., the mandatory questions of the test for information and publication of the results obtained.

In terms of indicators, the negative trend of implementation is manifested in the complete or partial absence of announcements of meetings of local councils, their executive committees and standing committees. Thus, only 20 of the 70 surveyed cities reported the upcoming meetings of the council or its bodies at least one working day in advance. Only 11 out of 20 cities announced meetings of all collegial bodies — city council, executive committee, standing committees, and the coordination body (if any). They are Zhytomyr, Lviv, Odesa, Poltava, Kolomyia, Okhtyrka, Shostka, Romny, Drohobych, Dnipro, and Uzhhorod. On the other hand, in 2022, about 70% of the studied cities violated the principle of openness in the work of the city council and its bodies (Article 4 of the Law of Ukraine "On Local Self-Government").

At the same time, legislation does not prohibit the announcement of local authorities' meetings during martial law, either. This is due to the fact that:
- Article 15, part 1, clause 7 of the Law of Ukraine "On Access to Public Information" obliges

information administrators to publish plans and agenda of their open meetings;

- Article 46, part 10 of the Law of Ukraine "On Local Self-Government in Ukraine" stipulates that decisions on summoning the session are communicated to council members and the population no later than 10 days before the session, and in extraordinary cases — no later than one day before the session, indicating the time of the meeting, the venue, and issues that will be discussed by the council;
- The Law of Ukraine "On Amendments to Certain Laws of Ukraine on the Functioning of Civil Service and Local Self-Government during the Period of Martial Law" does not provide for restrictions on announcing meetings of the city council or its bodies.

The situation is especially difficult with announcement of all meetings of the public commission on housing issues — only 10 of the 70 surveyed cities notified the residents of the activity of the respective agency. Since the main tasks of the commission are ensuring public oversight of compliance with the legislation concerning putting citizens on the housing wait list and removal from the list, distribution of housing, etc., the absence of announcements significantly complicated public oversight of the use of municipal housing. In 42 other cases, it was impossible to determine whether the commission held meetings at all, due to the lack of announcements and meeting minutes. Since public commissions on housing issues are not collegial subjects of authority, they are not subject to the legislative requirement to provide access to meetings, provided for in Article 3, part 1, clause 3 of the Law of Ukraine "On Access to Public Information."

As for streams, between March and December 2022, only ***six cities broadcast the meetings of three agencies*** — the city council, the executive committee, and standing committees. They are Lviv, Lutsk, Chernivtsi, Zviahel, Dnipro, and Mukachevo. 12 other cities (Ternopil, Zhytomyr, Odesa, Kamianets-Podilskyi, Novomoskovsk, Kovel, Oleksandriia, Romny, Rivne, Volodymyr, Uzhhorod, Pryluky) broadcast at least half of the meetings of two city council bodies. Despite the absence of legal requirements for broadcasting, municipalities continue to implement this practice, thereby ensuring transparency in decision-making.

It is worth mentioning that the option of holding remote meetings of the council with the provision of publicity for such meetings has appeared since the beginning of the coronavirus pandemic. For citizens, having council sessions broadcast online is an opportunity to get involved and influence the local political context. This is especially important when residents cannot attend the meeting in person, in particular due to challenges caused by russia's attack on Ukraine.

And finally, less than a half (32) of the official portals from all the city councils studied have ***versions for blind people or people with low vision***. There are no official statistics on the number of such people in Ukraine. According to unofficial data, this may apply to 100 to 300 thousand people, but the real numbers may be higher, particularly due to regular terror by russia. All people have the right to receive information online, and the adaptation of portals is important for the engagement of all residents in municipal life and decision-making.

Open Data and the Level of City Transparency

Before the start of the full-scale invasion, Ukraine was among the world leaders in open data, as illustrated by its high positions in international rankings. However, after February 24, 2022, this sphere is endangered. State registers were closed everywhere, access to the websites of information administrators was restricted.

In February 2022, the Open Data Portal (data.gov.ua), where city councils published sets required by law, was suspended. Local geoinformation portals and open data portals were also suspended, citing security risks. Access to some of the information published on the official websites of city councils or their municipal enterprises was restricted, and some information was permanently deleted.

Although access to the Portal was restored for administrators in rear regions in August 2022, the level of publication of open data remained unsatisfactory. Administrators were in no hurry to update existing information or fill the portal with new data sets. According to the research Open Data of Cities in War Conditions, conducted by the Transparent Cities program of Transparency International Ukraine, 18 oblast-level cities published only a quarter of the data sets mandatory for publication.

Security threats aren't the only thing that has negatively affected the state of open data at the local level. The policy and principles of data publication were not clearly communicated during the martial law period. For instance, according to the Cabinet Resolution No. 263, issued in March 2022, local authorities were allowed to restrict the work of registers. Some city councils closed access to portals at the request of law enforcement agencies. At the same time, there was no clear distinction of which data sets could carry a threat and which ones should be made public.

In July 2022, the Ministry of Digital Transformation of Ukraine initiated a discussion of changes to the Resolution of the Cabinet of Ministers of Ukraine No. 835 regulating the work with open data. According to the proposals of the designated ministry, the plan was essentially to legalize the practice of selective publication of data sets stipulated by the law. It was also proposed to remove a number of sets that could carry security risks (in particular, geospatial and urban planning information). Such actions caused a lively discussion in the community of researchers and experts in the field of open data. Until now, changes to the resolution have not been implemented in practice. At the time of publication of this study (March 2023), the legislative support for the open data policy has not been updated.

The so-called three-part test is mentioned in official explanations on publication of information. Information administrators of local authorities should establish whether information should be restricted based on positive responses to the following questions:
1. whether the information concerns the interests of national security, territorial integrity or

public order, whether unrest or crimes are possible due to access to the requested information, or whether restrictions are in the interests of public health;чи може розголошення інформації завдати істотної шкоди цим інтересам;

2. whether the disclosure of information may cause significant damage to these interests;
3. whether the harm from publicizing such information outweighs the public interest.

In practice, individual administrators limit access to information without explaining whether the above grounds are considered.

The lack of regulation in legislation has affected the level of publication of data sets locally. Due to vague explanations, local authorities are not ready to take responsibility for publishing information that could potentially affect the security situation.

In addition, the mass displacement of the population affected the number of specialists capable of effectively implementing policies in this sector. Due to a decrease in resources and a change in priorities, the policy of open data found itself on the back burner. Regular bombings by russia affected access to electricity and the Internet (which also affected the filling and updating of local portals).

Open data is the basis of city council transparency. Most indicators in this study are based on publication of open data sets required by the Ukrainian legislation. This information and the services created on its basis strengthen the resilience of city councils in responding to the challenges of war, and are the basis for evidence-based policies and effective decision-making.

Recommendations to Cities

- In the situation of martial law, city councils must **publish data sets and create services that would most contribute to the population adapting to the challenges of the war**. They include:
  - publication of the list of community-owned residential premises;
  - publication of real estate objects of municipal ownership (in particular, those offered for rent at electronic auctions, including land plots);
  - creation of services and information pages for IDPs, publication of information concerning the registration of the IDP status, the work of administrative service centers and social aid institutions, temporary accommodation and employment, as well as compensation for accommodating IDPs and compensation for utilities;
  - ensuring transparent accounting of citizens on wait lists for housing; creation of electronic services for such accounting;
  - introducing electronic services to obtain social aid — ordering the services in administrative service centers and other institutions with the possibility of further tracking of the application;
  - publication of the list of shelters in a convenient format (map) and maintaining it updated;
  - timely updating of information useful for the work of entrepreneurs in the conditions of martial law, in particular about preferential business conditions, educational opportunities, and adoption of regulatory acts.

- ***Ensure transparent accounting and distribution of aid***

  Ukrainian city councils are some of the key recipients of humanitarian aid from international partners. Significant volumes of aid are distributed among IDPs and other vulnerable categories of the population. At the same time, scandals related to non-transparent distribution or misappropriation of aid emerge occasionally. In order to avoid such incidents, it is necessary to comply with the Ukrainian legislation in the field of accounting for humanitarian and charitable aid, to keep its accounting records and statistical reporting. For better public reporting, the city council should inform in advance about the places of distribution of humanitarian aid, publish reports, indicate the providers of aid and publish the criteria for its distribution among the population.

- ***Restore the operation of local open data portals and geoportals in those cities where they are still closed, and proactively fulfill the requirements of Ukrainian legislation in the field of open data***

  Despite the legislative uncertainty of the open data policy, city councils in the rear should restore the operation of closed open data portals and city geoinformation systems, update information on them and fill them with new data sets. While identifying whether the information is not threatening, city councils must use the three-part test as provided by the Ukrainian legislation.

- ***Provide online broadcasts of meetings of collegial bodies under the city council***

    Access and participation of citizens in decision-making is an essential sign of transparent and accountable governance. Indicators related to the engagement of citizens in local policies are among the least complied with by city councils, even though the majority of them are legislative requirements. Most of the city councils do not broadcast meetings of collegial bodies — sessions of the city council, meetings of executive committees, standing committees of the council, and coordination bodies (if any). Given the displacement of large numbers of citizens and complicated physical access, we recommend ensuring broadcasts of meetings of city council agencies (with prior announcements and the opportunity to speak / ask a question). The option of holding remote meetings of the council has appeared since the beginning of the coronavirus pandemic.

- ***Publish minutes of meetings and documents adopted by collegial bodies of the city council***

    Minutes of city council and collegial body meetings are some of the main documents in the activity of local self-government, as they record key decisions made by these agencies. However, according to the ranking results, the indicator concerning the publication of minutes (C01) is only implemented by 48.6%. In addition to protocols, it is important to publish other documents adopted at the level of the city council, such as decisions of the city mayor, protocols of the public commission on housing issues, public reports, etc.

- ***Publish the list of persons appointed to positions in the local government on a non-competitive basis***

    Article 10, clause 5 of the Law of Ukraine "On Legal Regime of Martial Law" with amendments introduced by the Law of Ukraine of May 12, 2022, No. 2259-IX "On Amendments to Certain Laws of Ukraine on the Functioning of Civil Service and Local Self-Government during the Period of Martial Law" provides that during martial law, individuals can be appointed to local self-government agencies without a competitive selection. Despite this, the publication of a list of persons appointed without a competition would show transparency of the personnel policy.

Annex

Annex No. 1 Results of city transparency research during the full-scale war

🔵 **Transparent** – indicators implemented by 75% to 100%

🔵 **Partially transparent** – indicators implemented by 50% to 74%;

🔵 **Non-transparent** – indicators implemented by 49% or less

Name of the city	Category
Dnipro	Transparent
Lviv	Transparent
Mukachevo	Transparent
Vinnytsia	Partially transparent
Volodymyr	Partially transparent
Zhytomyr	Partially transparent
Kamianske	Partially transparent
Kyiv	Partially transparent
Kropyvnytskyi	Partially transparent
Lutsk	Partially transparent
Ternopil	Partially transparent
Uzghorod	Partially transparent
Chernivtsi	Partially transparent
Berdychiv	Non-transparent
Bila Tserkva	Non-transparent
Bilhorod-Dnistrovskyi	Non-transparent
Boryspil	Non-transparent
Boyarka	Non-transparent
Brovary	Non-transparent
Varash	Non-transparent
Vasylkiv	Non-transparent
Vyshneve	Non-transparent
Horishni Plavni	Non-transparent
Drohobych	Non-transparent
Dubno	Non-transparent
Dunaivtsi	Non-transparent
Zhmerynka	Non-transparent
Zhovti Vody	Non-transparent
Zviahel (Novohrad-Volynskyi)	Non-transparent
Ivano-Frankivsk	Non-transparent
Izmail	Non-transparent
Irpin	Non-transparent
Kalush	Non-transparent
Kamianets-Podilskyi	Non-transparent

Kovel	Non-transparent
Kolomyia	Non-transparent
Konotop	Non-transparent
Korosten	Non-transparent
Kremenchuk	Non-transparent
Lubny	Non-transparent
Myrhorod	Non-transparent
Netishyn	Non-transparent
Nizhyn	Non-transparent
Novovolynsk	Non-transparent
Novomoskovsk	Non-transparent
Odesa	Non-transparent
Oleksandriia	Non-transparent
Okhtyrka	Non-transparent
Pavlohrad	Non-transparent
Podilsk	Non-transparent
Poltava	Non-transparent
Pryluky	Non-transparent
Rivne	Non-transparent
Romny	Non-transparent
Sambir	Non-transparent
Svitlovodsk	Non-transparent
Slavuta	Non-transparent
Smila	Non-transparent
Starokostiantyniv	Non-transparent
Stryi	Non-transparent
Sumy	Non-transparent
Uman	Non-transparent
Fastiv	Non-transparent
Khmelnytskyi	Non-transparent
Chervonohrad	Non-transparent
Cherkasy	Non-transparent
Chernihiv	Non-transparent
Chornomorsk	Non-transparent
Shepetivka	Non-transparent
Shostka	Non-transparent

Annex No. 2 Algorithm for determining the city category based on the number of implemented criteria

Depending on the level of implementation of the indicators, cities are assigned different categories of transparency. To do this, the colors of indicators are first converted into quantitative indicators:

Indicator implementation level	Color	Score
Fully implemented	green	2
Partially implemented	orange	1
Not implemented	red	0
Impossible to establish	gray	−

To identify the category of the city, the **40 indicators** are converted into the maximum score of **80 points**, which is **100% of the implementation**. If the city has indicators that cannot be evaluated, 100% will be the numerical indicator without "gray" indicators. For example, if two indicators in the city cannot be evaluated according to the parameters defined above, they receive the "gray" status. Accordingly, the category of the city is calculated based on the performance of 38 indicators instead of 40. In this case, the numerical value for 100% completion will be 76 points instead of 80. This method of calculation is designed to provide the most objective assessment in each specific case.

Levels of implementation provide for three possible options — full implementation of an indicator, partial implementation, or no implementation. If it is impossible to establish the level of implementation of an indicator, there is a separate option, "impossible to establish."

1. If at the time of the study (January 2023) there was a technical failure in the work of the official portals, which made it impossible to check the implementation of the indicator. Interruptions in the power supply and the work of communication providers, associated with damage to the critical infrastructure of Ukraine, could also affect the work of portals of information administrators.

2. If the city council has developed tools that allow residents to influence city policy, leave complaints or suggestions, but the public did not use them between March and December. For example, residents did not leave reviews about procurement on the Dozorro portal, did not create petitions, did not make requests to solve the problem in the housing and municipal sector.

3. If there is not enough information to form an objective assessment of the activity of an agency or policy in general. For example, if there are no announcements of meetings of the public commission on housing issues, as well as minutes of its meetings, it is impossible to identify whether such a body held meetings at all during the period under study (March–December 2022).

4. The research methodology provides for the assessment of only regular sessions. Off-schedule sessions in the period from March to December 2022 were not evaluated, as they were not foreseen by the indicator.

We suggest considering detailed guidance for identifying the category of the city using the example below.

Based on the study of the city of N, we have the following results based on 40 indicators:

- 23 – implemented fully;

- 7 – implemented partially;

- 5 – not implemented;

- 5 – impossible to establish.

The total number of points for city N (the sum of the performance of all indicators): 23 indicators * 2 points + 7 indicators * 1 point + 5 indicators * 0 points = 53 points.

The number of indicators whose implementation can be assessed for city N (from all the indicators provided by the methodology, subtract the indicators that cannot be established): 40 – 5 = 35 indicators.

The maximum number of points that city N can receive for indicators whose performance can be evaluated (subtract the maximum possible amount of "gray" indicators from the maximum number of points for all indicators): 40 indicators * 2 points – 5 indicators * 2 points = 70 points.

The level of performance of indicators by city N, in % (divide the total number of points for the city by the maximum possible number of points for the city and multiply by 100%): 53 points / 70 points * 100% = 75.71%. Performance of indicators at the level of 75.71% indicates that the city is in the category of "transparent" cities (75-100%).

The category of the city and the level of implementation of the indicators are also summarized by color, without outputting an aggregated numerical indicator.

Implementation level	Explanation
Transparent city	The level of implementation of indicators by the city council is 75% or more
Partially transparent city	The level of implementation of indicators by the city council is 50% to 74%
Non-transparent city	The level of implementation of indicators by the city council is 49% or less