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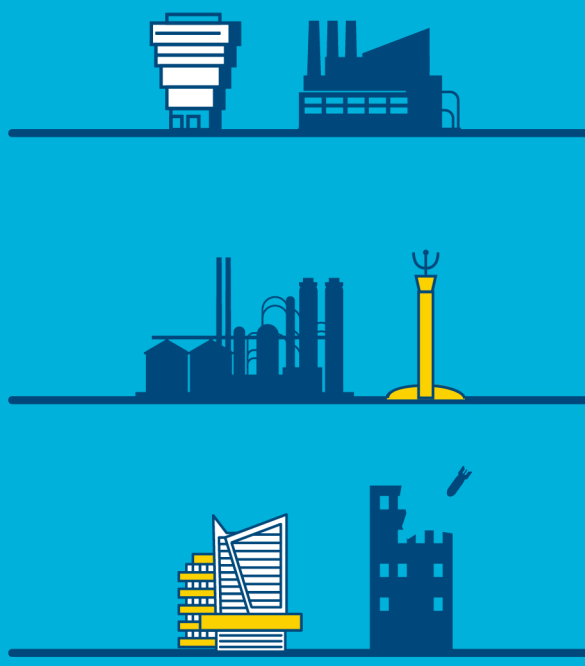
TRANSPARENCY INTERNATIONAL UKRAINE

2024

RANKING TRANSPARENCY

100 UKRAINIAN CITIES



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. In 2017–2022, the program annually compiled the Transparency Ranking of the 100 largest cities in Ukraine. After the full-scale invasion, the program conducted two adapted assessments on the state of municipal transparency during wartime. In 2024, the program resumed the creation of the transparency ranking for 100 cities and launched a new study, Open Data Pulse: Ukrainian Cities Ranking. The program produces high-quality analytics on various aspects of government-citizen interaction, as well as transparency and accountability in Ukrainian cities. This includes, in particular, processes such as decolonization, housing policy, and so on.

https://ti-ukraine.org/en
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Transparency Ranking of 100 Ukrainian Cities in 2024.

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Research methodology

To assess municipal transparency and rank cities, analysts of the Transparent Cities program updated and adapted the assessment methodology to reflect current challenges and the country's present context.

The Transparency Ranking **covered** 100 cities across 21 regions of Ukraine. Due to Russia's armed aggression, the ranking excluded cities located in occupied territories, areas of active hostilities, and urban communities governed by military administrations with expanded powers. At the same time, analysts assessed Kyiv, Varash, Netishyn, Sumy, and Chernihiv, as their city councils continued to operate despite the establishment of military administrations. We also assessed 10 cities officially designated as territories of potential hostilities: Hlukhiv, Zaporizhzhia, Zlatopil, Lozova, Marhanets, Mykolaiv, Okhtyrka, Sumy, Kharkiv, and Shostka.

The team analyzed the official and specialized websites of city councils, their subordinate bodies, departments, and municipal enterprises, as well as reviewed responses to information requests. In addition, we examined data from BI Prozorro Public Module, Prozorro.Sales, and the Unified State Open Data Web Portal. In some cases, information was verified through local and national media. The analysis covered local government activities from January to December 2024, with the exception of the indicator related to the publication of construction resource prices.

The level of city transparency was assessed using **70 indicators** developed based on current legislation, findings from previous research, best European practices, and European integration requirements. These indicators cover the organization of city council operations, publication of information on official platforms, and access to data on land and housing, municipal property, the social sector, humanitarian aid received, shelter locations, and compensation for destroyed or damaged property, among other sectors.

This year, the methodology also introduced alternative indicators for cities unable to meet the primary ones. These apply, for instance, to cities where the Ministry of Digital Transformation temporarily restricted access to open datasets, or to those where no damaged or destroyed facilities were recorded.

A city could earn a maximum of 100 points for full implementation of all indicators, with its position in the ranking determined by the final score.

City ranking and transparency status:

Transparent city	**75-100 points**
Partially transparent city	**50-74.5 points**
Non-transparent city	**0-49.5 points**

Comprehensive city assessments enable the identification of strengths and weaknesses in governance practices, the prioritization of key policies and services, and the formulation of recommendations to improve municipal transparency and accountability.

Contextual background of cities in 2024

The year 2024 was yet another exceptionally challenging period for municipalities. War-affected cities continued to operate under extreme conditions – amid shelling, power outages, and uncertainty, yet with hope for recovery. At the same time, expectations for local governments remained high: they were relied upon to ensure quality of life, deliver essential services, support residents in crisis, and develop new solutions in an unpredictable environment.

Cities are regularly subjected to missile attacks – Russia has launched over 12,500 weapons of destruction, including ballistic missiles, UAVs, and cruise missiles, not counting those used directly along the front line—forcing local governments to operate under constant threat and heightened danger. This significantly limits opportunities for civic engagement, hinders citizens' access to administrative services, and compels local authorities to redirect resources toward meeting the population's basic needs.

In 2024, the Verkhovna Rada of Ukraine adopted several laws that reshaped the administrative-territorial structure and introduced new transparency standards, including mandatory video recording of council meetings. These legislative changes also clarified mechanisms for local democracy, simplified citizen engagement, and expanded the rights of IDPs and youth in community governance. Also, the binding nature of community charters was clearly established, while regulations on public consultations and medium-term budget planning at the local level were introduced. The state budget for 2025 consolidated financial support for frontline communities.

Attention to European integration has intensified. Notably, the Parliament adopted the Law on International Territorial Cooperation, creating expanded opportunities for Ukrainian communities to collaborate with municipalities in the EU. At both national and regional levels, various institutions are actively working to fulfill commitments under the Facility Plan. Ukraine's European integration path has become a key driver in setting new standards for local governance, particularly in areas such as transparency, digital transformation, and public procurement.

Last year, the Ukrainian economy showed modest signs of recovery. However, economic growth was constrained by intensified hostilities, damage to critical infrastructure, labor shortages in key sectors, a poor harvest, and weak external demand for Ukrainian products.

Amid ongoing war, communities were compelled to reallocate portions of their budgets toward security, reconstruction, energy expenditures, and support for IDPs and veterans. In 2024, procurement of drones and vehicles for the needs of the Armed Forces of Ukraine also increased. Fifty of the 100 city councils studied (115 procuring entities) procured non-specialized vehicles using budget funds, carrying out 640 procurement transactions totaling UAH 756 million. In addition, city councils spent UAH 3.14 billion on drone procurement in 2024.

Local governments experienced high staff turnover due to migration, mobilization, burnout, and the absence of systematic personnel reinforcement. In some cities, this led to a slowdown in entire areas of activity, particularly those related to transparency.

There were widespread withdrawals from participatory budgeting, suspension of public events, and delays in the development of local services, particularly those based on open data. Only 8 out of the 100 cities studied implemented participatory budgeting in 2023–2024, while just 13 city councils held budget hearings.

It is worth recalling that in 2022, the Ministry of Digital Transformation of Ukraine officially restricted public access to datasets from information managers in six frontline regions (including Zaporizhzhia, Kharkiv, and Mykolaiv) due to security risks (Ministry letter No. 1/06-2-6620 dated 09.08.2022). However, an alternative approach for city councils and other information managers in these regions has not yet been proposed. As a result, researchers, businesses, and citizens remain unable to access local open data from these areas.

In 2024, local authorities also faced growing public pressure. Citizens demanded not only formal transparency, but genuine accountability and participation in decision-making. For instance, in Dnipro, Kyiv, and Cherkasy, residents initiated changes in budgetary approaches and advocated for increased funding for the Armed Forces of Ukraine. In Kharkiv and Odesa, citizens submitted proposals for renaming and held rallies to influence local authorities. The public sought clarity on resource allocation, engaged in policy formation, and took part in discussions and surveys organized by local governments. These examples reflect a strong public demand for meaningful participation in community life.

Sociological surveys continue to show a consistently high level of public trust in the Armed Forces of Ukraine (96%) and a somewhat lower level in volunteer battalions (60%). In contrast, trust in local authorities remains moderate: only 48.4% of respondents trust their local council, and 54.2% trust the head of their locality. According to the 2024 annual municipal survey, the awareness index of residents in regional centers regarding the activities of city councils stands at 1.47 out of a possible 3. The general perception of city governments has also become more critical. These findings point to heightened expectations and a growing demand for accountability from local authorities.

The absence of a strong and systematic relationship between government, citizens, and businesses at various levels negatively impacts perceptions of government effectiveness and trust in decision-making. According to the SOCIS survey General Situation in Ukraine – March 2024, only 34% of citizens rated their city or village council as somewhat or very effective, while 51.6% considered it ineffective or completely ineffective.

The year 2024 reaffirmed that effective governance and transparency are not secondary concerns but core indicators of a community's resilience in times of crisis. War does not excuse a lack of openness; on the contrary, it heightens the need for transparency, as trust and a sense of fairness, particularly in resource allocation, are essential for cities' survival. Ukraine's European integration path sets a new standard for governance quality, encompassing everything from the digitalization of services to the adoption of strategic documents and the development of citizen engagement tools. These are no longer optional recommendations, but essential prerequisites for securing funding, partnerships, and collaborative initiatives. Ultimately, local authorities must recognize that high-quality governance is unattainable without transparency.

Key research results

- The Transparency Ranking 2024 includes 21 regions and the city of Kyiv. A total of 24 large[1] cities participated in the research (including million-plus cities such as Kyiv, Kharkiv, Dnipro, and Odesa[2]), along with 26 medium-sized and 50 small towns.

- This year, the "non-transparent" category remains the largest, with 72 cities receiving this status after scoring fewer than 50 points. 22 cities were classified as "partially transparent" (50–74.5 points), while six cities surpassed the 75-point threshold.

- Based on the study results, five municipalities received the status of "transparent" cities: Chernivtsi, Vinnytsia, Lutsk, Mukachevo, and Lviv. In contrast, two cities that held this status last year—Dnipro and Drohobych—dropped from the leading positions, scoring 64 and 66 points, respectively.

- The Transparent Cities program decided not to assign Ternopil a status or position in the Transparency Ranking of 100 cities. During the assessment, program analysts discovered that the Ternopil City Council had submitted false information in its completed questionnaire and that content on the city council's website had been modified to artificially increase the city's score in the ranking. In response to the program's inquiry, the Ternopil City Council stated that "employees made an unfortunate mistake by submitting incorrect links to some publications." The council also requested that certain entries in the questionnaire for the 2024 Transparency Ranking and the Open Data Pulse rating be excluded from the assessment. Subsequently, the links provided by the city council became inactive. TI Ukraine later sent an additional request asking whether an internal audit had been conducted and whether those responsible for the false information had been identified. In reply, the Ternopil City Council stated that "measures were taken to ensure a timely, comprehensive, complete, and objective review of the circumstances," and reported holding a meeting to "discuss the situation," during which employees were "warned about disciplinary consequences for failure to perform or improper performance of duties under the employment contract."

- Chernivtsi topped the Transparency Ranking with 84.5 out of 100 points, demonstrating significant progress. Its performance improved by 27.1 percentage points (p.p.) compared to the previous year. The top 10 includes seven regional centers and three other cities: Vinnytsia (81 points), Lutsk (76), Mukachevo (75), Lviv (75), Bila Tserkva (69), Mykolaiv (68), Kropyvnytskyi (67.5), Drohobych (66), and Khmelnytskyi (64.5).

- The worst results were gained by Konotop[3] (11 points out of 100 possible), Mohyliv-Podilskyi (15.5), Zolochiv (16), Khust (16.5), Bilhorod-Dnistrovskyi (17.5), Pivdenne and Vyshneve (19.5 each), Samar (21.5), Hlukhiv, and Izmail (22.5 each). Half of these cities took part in the transparency study for the first time, while the remaining five had participated in previous assessments.

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[1] A large city is defined as having a population of over 200,000; a medium-sized city, between 50,000 and 200,000; and a small city, up to 50,000 residents.

[2] According to the national mobile operator as of autumn 2024.

[3] In response to Transparency International Ukraine's official letter, city council representatives reported that the website's functionality was limited due to damage and partial access restrictions.

City Transparency Ranking 2024

City	Position in the ranking	Score
Chernivtsi	1	84.5
Vinnytsia	2	81
Lutsk	3	76
Mukachevo	4	75
Lviv	4	75
Bila Tserkva	6	69
Mykolaiv 🔥	7	68
Kropyvnytskyi	8	67.5
Drohobych	9	66
Khmelnytskyi	10	64.5
Dnipro	11	64
Zaporizhzhia 🔥	12	63
Uzhhorod	13	62
Kolomyia	14	61.5
Kamianske	15	61
Ivano-Frankivsk	16	60.5
Volodymyr	16	60.5
Sheptytskyi	18	60
Korosten	19	57.5
Pokrov	20	57
Varash	21	55.5
Chernihiv	22	54
Kalush	23	53
Zhytomyr	24	52.5
Slavuta	25	52
Kyiv	26	51.5
Rivne	27	50
Kryvyi Rih	28	48
Sumy 🔥	28	48
Kremenchuk	28	48
Stryi	28	48
Okhtyrka 🔥	28	48
Pivdennoukrainsk	33	47
Odesa	34	45.5
Kovel	34	45.5
Uman	36	45
Lozova 🔥	37	44.5
Romny	38	44
Chortkiv	38	44
Dubno	40	43.5
Brovary	41	43
Chornomorsk	42	41.5
Boryslav	42	41.5
Zviahel	44	40.5
Zlatopil 🔥	44	40.5
Kamianets-Podilskyi	46	39.5
Pervomaisk	46	39.5
Berdychiv	48	39
Netishyn	49	38
Poltava	50	37.5
Oleksandriia	50	37.5
Kharkiv 🔥	52	37
Obukhiv	52	37
Myrhorod	52	37
Boiarka	55	36.5
Vyshhorod	55	36.5
Smila	55	36.5
Synelnykove	58	36
Pryluky	59	35.5
Cherkasy	60	34.5
Irpin	60	34.5
Shostka 🔥	60	34.5
Fastiv	60	34.5
Horishni Plavni	64	33.5
Nizhyn	64	33.5
Novovolynsk	66	32.5
Shepetivka	66	32.5
Marhanets 🔥	66	32.5
Vasylkiv	69	32
Zhmerynka	70	31.5
Zhovti Vody	71	30
Zolotonosha	72	29.5
Hadiach	72	29.5
Boryspil	74	29
Bucha	75	28.5
Lubny	75	28.5
Pereiaslav	75	28.5
Khmilnyk	78	28
Shakhtarske	79	27.5
Kostopil	80	26.5
Berehove	81	26
Pavlohrad	82	25
Truskavets	83	24.5
Sambir	83	24.5
Starokostiantyniv	85	24
Svitlovodsk	85	24
Podilsk	85	24
Novoiavorivsk	88	23.5
Brody	88	23.5
Izmail	90	22.5
Hlukhiv 🔥	90	22.5
Samar	92	21.5
Vyshneve	93	19.5
Pivdenne	93	19.5
Bilhorod-Dnistrovskyi	95	17.5
Khust	96	16.5
Zolochiv	97	16
Mohyliv-Podilskyi	98	15.5
Konotop	99	11

▲ *Position in the ranking*

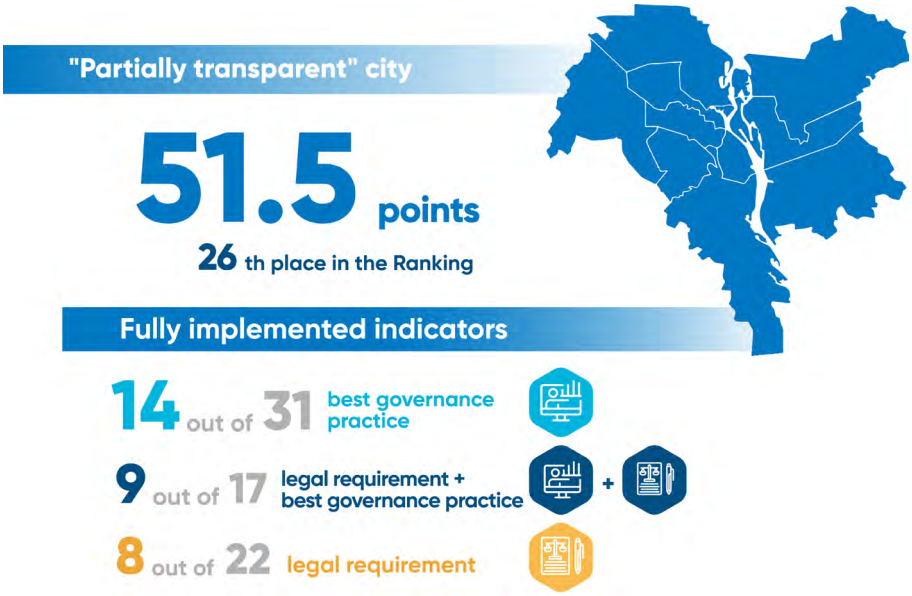
transparent | partially transparent | non-transparent | 🔥 territories of potential hostilities

- The average level of city transparency constitutes 41.6%. The average transparency level among large cities was 59.1%, among medium-sized cities – 41.7%, and among small cities – 33.2%. Only four small towns achieved "partially transparent" status: Volodymyr (60.5 points), Pokrov (57), Varash (55.5), and Slavuta (52).

- This year's study sample includes 22 new cities, 21 of which are small. The average indicator implementation rate among these new participants was 28.2%, compared to 45.4% among the 78 cities that had previously participated in the program's research.

- As part of the ranking, analysts assessed 10 cities designated as territories of potential hostilities. Their average transparency level was 43.9%—slightly above the overall average. Mykolaiv and Zaporizhzhia were classified as "partially transparent," while the remaining eight frontline cities—Hlukhiv, Zlatopil, Lozova, Marhanets, Okhtyrka, Sumy, Kharkiv, and Shostka—were categorized as "non-transparent." Mykolaiv led this group, demonstrating substantial progress by securing seventh place overall in the 2024 ranking with 68 points. Zaporizhzhia recorded the most significant improvement of all cities assessed, rising to 12th place due to a 27.3 percentage point increase in performance compared to 2023.

Results of Kyiv

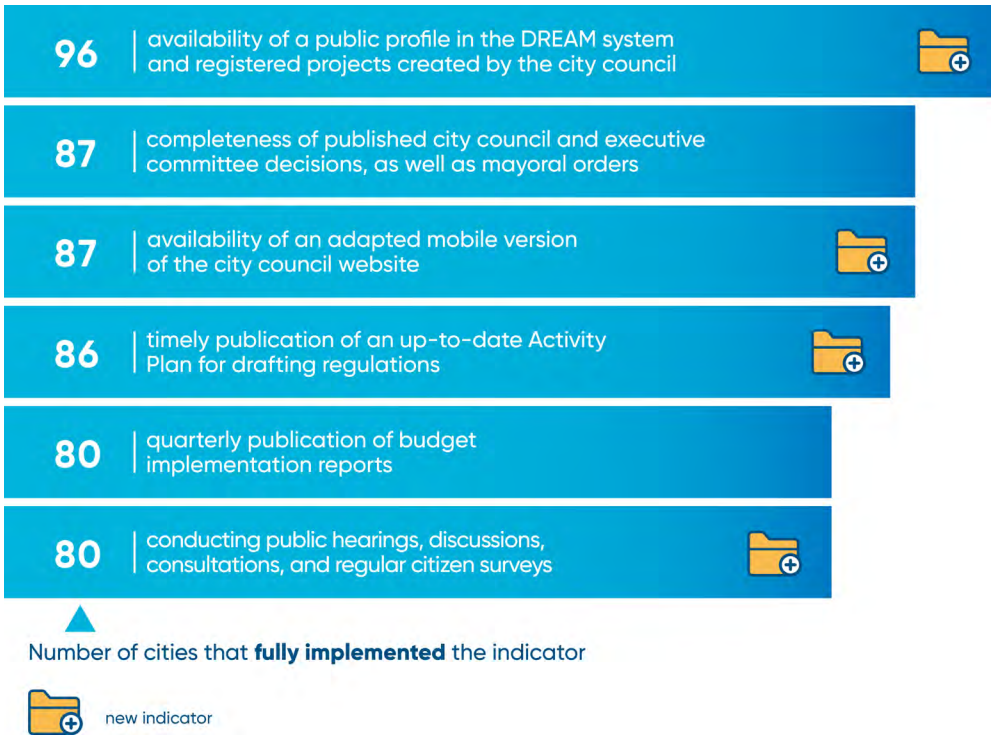


- The most represented regions in the study were Kyiv (12 cities), and Dnipropetrovsk and Lviv regions (10 cities each). Of these, 11 municipalities from the Kyiv region and 7 each from the Dnipropetrovsk and Lviv regions were classified as "non-transparent".

- The poorest-performing regions were Odesa and Sumy. In the Odesa region, the highest score was recorded by the city of Odesa—45.5 points—still within the "non-transparent" category. A similar situation was observed in the Sumy region, where all cities also remained classified as "non-transparent." Notably, Okhtyrka, a small city designated as a territory of potential hostilities, received the same score—48 points—as the regional center, Sumy, which holds the same status.

- Among the thematic areas assessed by the program, cities demonstrated the highest levels of indicator implementation in openness (43.6%), public relations (41.7%), and response to war-related challenges (39.6%). In contrast, the majority of indicators were marked as "not implemented" in the areas of services to citizens (67%), municipal property and land management (61.1%), and HR policy and integrity (60.3%).

What cities did best in 2024



What cities did the worst in 2024

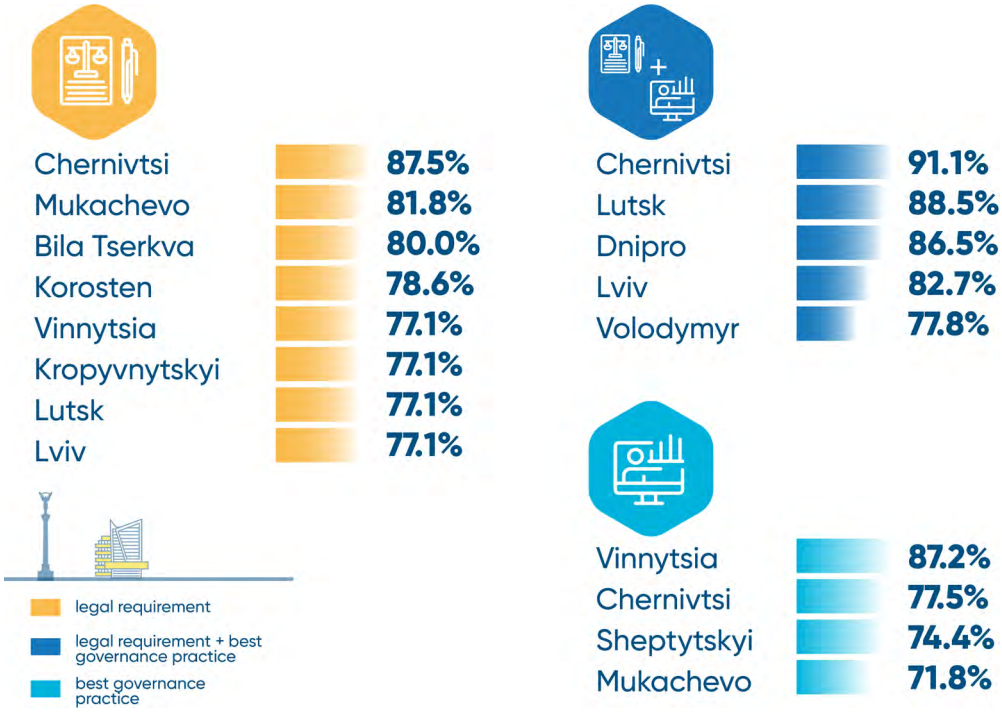
- This year, cities performed best on indicators that combine legal requirements with best governance practices, achieving an average implementation rate of 45%. Indicators based solely on legal requirements had a slightly lower average of 44.1%. Meanwhile, indicators reflecting best practices not yet mandated by law were implemented at an average rate of just 37.1%.

2024 City Transparency Ranking Leaders

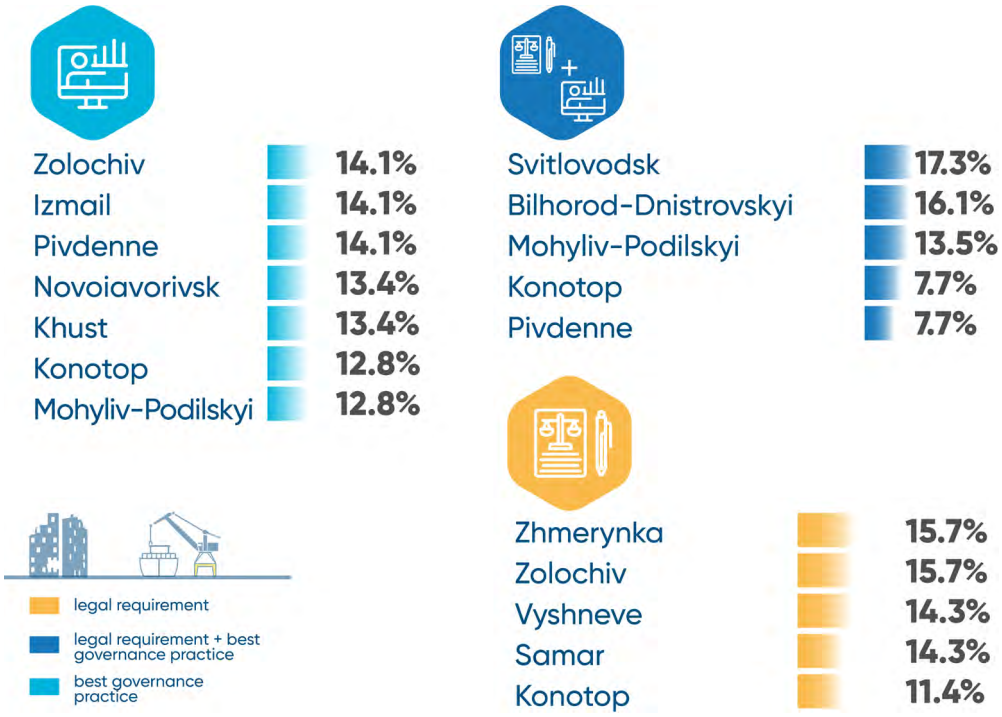
City	legal requirement	legal requirement + best governance practice	best governance practice
Chernivtsi	**87.5%**	**91.1%**	77.5%
Vinnytsia	77.1%	76.9%	**87.2%**
Lutsk	77.1%	88.5%	66.7%
Mukachevo	81.8%	71.4%	71.8%
Lviv	77.1%	82.7%	67.9%
Bila Tserkva	80.0%	73.1%	56.4%
Mykolaiv	74.3%	61.5%	66.7%
Kropyvnytskyi	77.1%	67.3%	59.0%
Drohobych	62.9%	63.5%	70.5%
Khmelnytskyi	62.9%	59.6%	69.2%

- In addition to the accomplishments of the top-ranking cities, several noteworthy achievements stand out: Korosten fully implemented 72.7% of the indicators related to legal requirements; Volodymyr and Kamianske each implemented 70.6% of the indicators that combine legal obligations with best practices; and Sheptytskyi achieved full compliance with 71% of the indicators assessing the implementation of best governance practices.

Leaders in different indicator categories



Anti-leaders in different indicator categories



- 31 indicators in the 2024 ranking can be classified as "European integration" indicators, as they align with specific requirements outlined in the European Commission's report under the 2024 EU enlargement package and the Ukraine Facility reform plan. On average, cities achieved a 46.7% implementation rate for these indicators.

- The "European integration" indicators with the highest number of full implementations correspond to those found among the top five indicators in the overall Transparency Ranking. These include the presence of a public profile in the DREAM system for accountable restoration management and projects created by the city council; the publication of official decisions; the dissemination of an activity plan for drafting regulations; the conduct of public hearings, discussions, or consultations; and the publication of up-to-date information on business operations under martial law (73 cities fully implemented these indicators).

- Conversely, the indicators with the lowest levels of implementation included the conduct of open budget hearings (not fully implemented by 87 cities), publication of data on the accessibility of buildings for persons with disabilities (77 cities), availability of a municipal energy plan (76 cities), publication of a list of municipal land plots proposed for transfer of ownership (73 cities), and disclosure of the structure of city council divisions and its subordinate enterprises, institutions, and organizations (72 cities).

- While the availability of human and financial resources does influence municipal transparency to some extent, no strong correlation has been observed. Similarly, a city's success in achieving transparency is not linked to its proximity to EU borders or its distance from areas of active hostilities.

Comparison of Transparency 2024 and Transparency 2023: What has changed?

Of the 100 cities included in the 2024 study, 78 also participated in the 2023 ranking. Dunaivtsi and Nikopol were not included in the 2024 assessment. **According to the 2023 study, the average transparency level among these cities was 42.2%,** with the highest scores observed in indicators combining legal requirements and best governance practices. **In 2024, the average transparency level across the same 78 municipalities rose to 45.4%[4].**

A comparison of the performance levels for 36 indicators assessed in both the 2023 and 2024 rankings across 78 cities shows some progress — 46.8% in 2024 compared to 43.6% in 2023.

City councils continued to better implement indicators that are a legal requirement, as well as those that combine legal requirements and best governance practices[5]. The performance level for the first type of indicators is approaching 50%, and the second type exceeds 55%. However, cities still have considerable work ahead, especially since these indicators are grounded in current legislation and therefore subject to mandatory implementation.

Table 1. Average implementation levels of 36 indicators in 78 cities in 2023 and 2024

Indicator requirement	Number of indicators		Average performance level	
	2023	2024	2023	2024
Legal requirement	12	15	41.5%	49.8%
Best governance practice	10	9	36.0%	30.8%
Legal requirement + best governance practice	14	12	51.9%	55.1%

Transparency indicators: What was implemented?

The most positive dynamics compared to 2023 were observed in the following indicators:

- accessibility of the official city council website for individuals with visual and other impairments *(42.9% → 85.9%)*;
- consistency between the executive committee's draft agenda and the issues considered during meetings *(27.3% → 48.1%)*;
- publication of video recordings of meetings of the city council *(50.6% → 71.2%)*;
- publication of meeting minutes of local self-government bodies: the city council, executive committee, and standing committees *(51.9% → 68.6%)*;
- publication of video recordings of meetings of standing committees *(21.4% → 37.2%)*.

[4] Meanwhile, the average transparency level across 100 cities for 70 indicators stands at 41.6%.

[5] 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.

State institutions are required to follow the standards of DSTU EN 301 549:2022 when creating, updating, or developing information systems and electronic documents (in accordance with Cabinet of Ministers of Ukraine Resolution No. 757 dated July 21, 2023). In 2024, the implementation levels of the indicator on the accessibility of official websites were revised in accordance with certain provisions of the said DSTU. The study results indicate that many municipalities, when updating their websites, are taking into account the requirements of this national standard.

In 2024, amendments were introduced to the Law of Ukraine on Local Self-Government, making video recording of city council plenary sessions and standing committee meetings mandatory. It can be stated with confidence that this legislative initiative was the primary driver behind the increased level of implementation of the corresponding indicators.

The high level of implementation of the indicator on the publication of minutes of local self-government meetings is largely explained by a methodological change: unlike in 2023, the 2024 assessment did not require verification of minutes from coordinating bodies such as the conciliatory council or council board.

All indicators that showed the greatest positive dynamics either fully align with legal requirements or combine regulatory obligations with best practices.

However, the bottom of the indicator ranking—those showing negative performance dynamics—was led by two criteria based on best governance practices. In other words, these are areas where city councils have discretion in whether or not to apply them. Indicators with the highest negative performance dynamics:

- availability of an electronic registration system for municipal secondary school institutions, or a link to the national registration system *(58.1% → 27.6%)*;
- availability of an electronic tool for registering complaints and inquiries of citizens, enabling the upload of necessary documents and tracking the status of appeals *(76.1% → 52.6%)*;
- dissemination of information on decisions to provide compensation for damaged or destroyed real estate *(40.5% → 17.6%)*;
- publishing the up-to-date information on the location of civil protection structures *(86.1% → 64.1%)*;
- publication of open datasets on the registration of citizens in need of better housing conditions *(55.1% → 37.2%)*.

The wording of the first of these criteria changed significantly compared to 2023. In the previous study, a similar indicator applied simultaneously to both preschool and secondary education institutions. Also, the assessment did not account for differences in performance related to whether cities used national or local registration systems. In 2024, the indicator was divided into two separate criteria, and the use of the nationwide system was evaluated as partial implementation. Since city councils are significantly more likely to offer residents access to electronic registration systems for kindergartens than for schools, this became the most underperforming indicator in the assessment.

The next indicator from the list has also undergone significant changes. In 2023, analysts assessed whether the city council had a platform or tool for responding to complaints and inquiries from citizens. In 2024, the criterion became more demanding, evaluating not only the presence of such a tool but also whether it allowed users to track the status of their submissions. This additional requirement clearly contributed to a decline in performance.

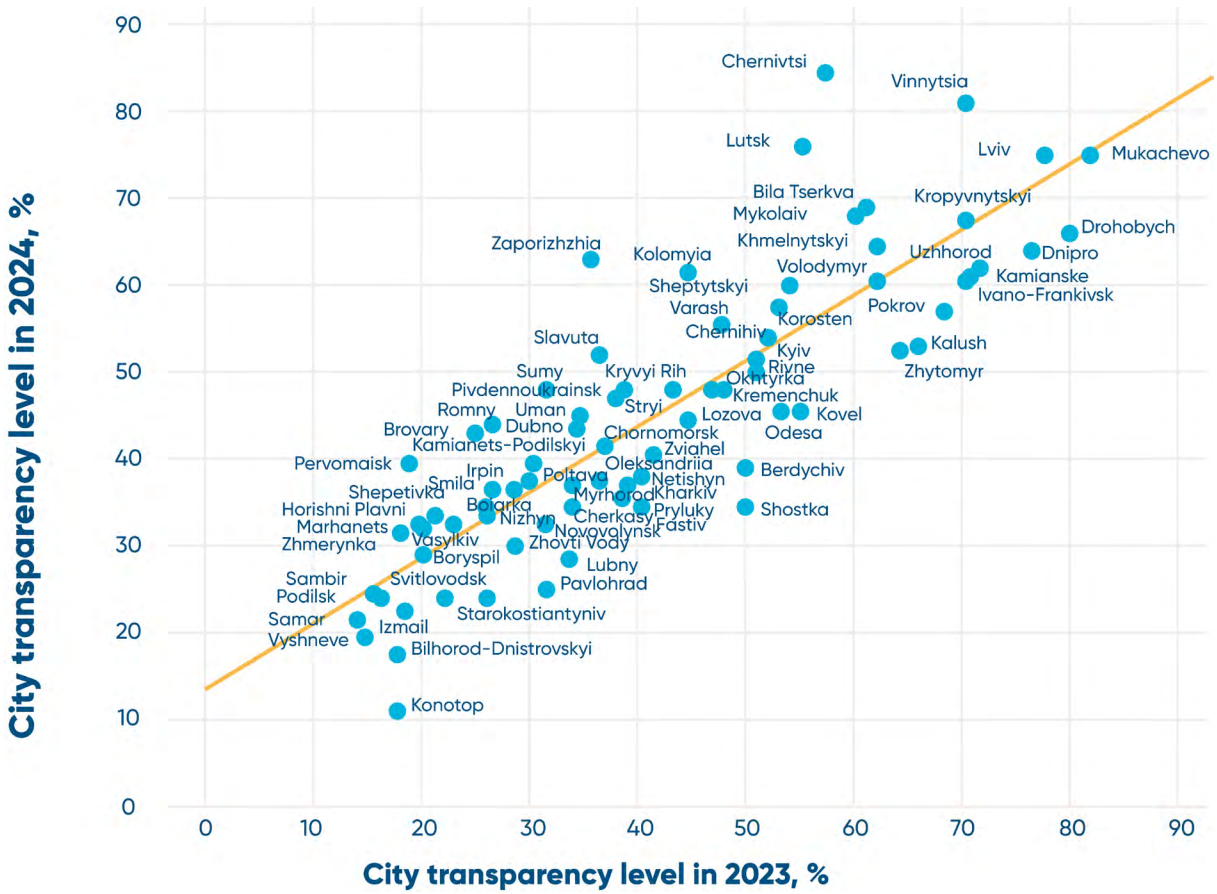
In addition to changes in the wording of the indicators, another factor inevitably influenced the assessment results. In the previous year, the research methodology allowed for an "impossible to assess" implementation level, but in 2024, the analytical team removed this category from the methodology.

The indicator concerning conducting electronic auctions for the sale of rights to install seasonal trade facilities and temporary structures for business activities was the most problematic for 78 cities in 2023—and remains so. The implementation rate increased only marginally, from 3.9% to 3.8%. Last year, Irpin, Lviv, Ternopil, and Khmelnytsky conducted one type of auction, while only Kyiv held both types. In 2024, analysts examined auctions conducted through Prozorro.Sale and found that only six cities—Vinnytsia, Dnipro, Kyiv, Kovel, Lviv, and Ternopil—held auctions of even one type.

Trends in city transparency: What changed?

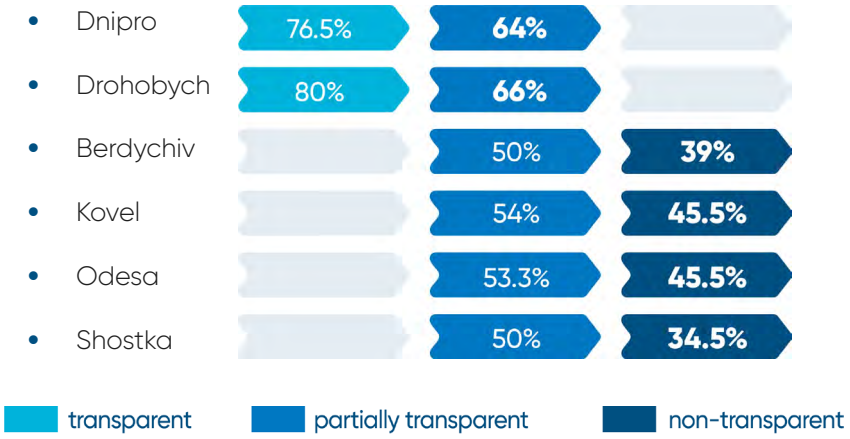
When summarizing the evaluation results, analysts observed a strong positive correlation between the levels of indicator implementation by city councils in 2023 and 2024[6]. This suggests that despite changes to the assessment methodology, an increased number of indicators, and greater complexity in some of them, cities that performed well last year maintained their positions this year, and those that lagged behind continued to do so.

Relationship between transparency levels of 78 cities in 2023 and 2024



[6] This is supported by a strong Pearson correlation coefficient of 0.86 (p-value = $6.0936e^{-24}$).

However, there have also been changes that deserve special attention. **Two cities lost their "transparent" status and four more lost their "partially transparent" status:**



Shostka **demonstrated the largest decline among the 78 cities, measured in percentage points.**

The new indicators—those not included in the 2023 ranking—became a stumbling block for Dnipro and Drohobych. Depending on the impact of wartime circumstances, each city could have between 34 and 37 such indicators out of a total of 70. Their implementation provided from 47 to 50 points out of 100 possible.

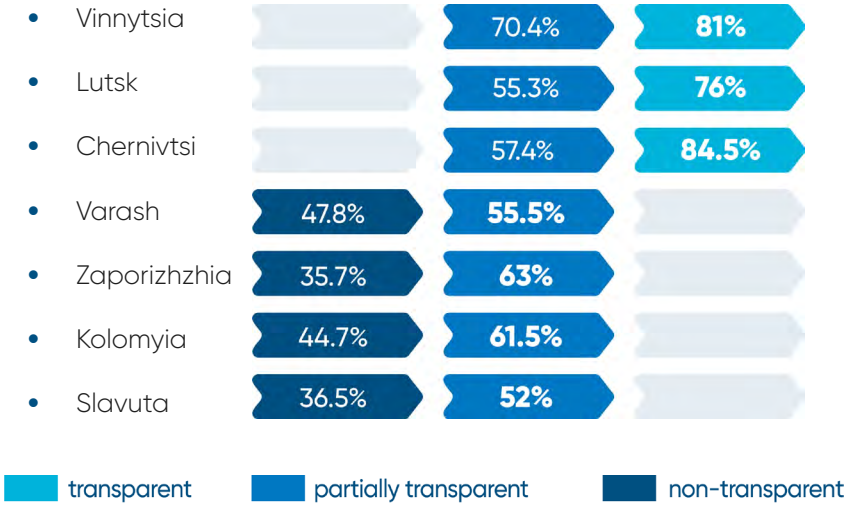
Of the 16 indicators that the Dnipro City Council failed to implement, 13 (81.3%) were new. Similarly, 10 of the 14 unimplemented indicators in Drohobych (71.4%) were newly introduced. The failure to meet new indicators also contributed to the decline in other cities that shifted to a "non-transparent" status, though to a lesser extent: in Shostka, 63.2% of unimplemented indicators were new; in Kovel, 60%; in Odesa, 56.7%; and in Berdychiv, 50%.

In 5 out of 6 cases, municipalities failed to develop a plan for the restoration and development of the territorial community, did not hold open budget hearings, and faced issues with publishing open data on the accessibility of buildings for people with disabilities and on the structure of budget managers and recipients. They also did not approve a unified methodology for analyzing or monitoring prices for construction materials.

As for the indicators that carried over from the 2023 study to 2024, the most problematic for this group of cities were those related to:

- the publication of accurate lists of draft decisions in the field of land relations in the draft agendas of council meetings;
- the availability of a system for electronic registration of applications for housing registration;
- conducting electronic auctions for the sale of rights to install seasonal trade facilities and temporary structures for business activities;
- proper responses to submitted petitions;
- and the publication of open data sets on citizens registered as needing improved housing conditions and on movable municipal property.

At the same time, **seven cities improved their status**. These are the following cities:



Vinnytsia and Chernivtsi fully implemented the highest number of new indicators—27 each. For Vinnytsia, this accounted for 79.4% of all new indicators; for Chernivtsi, 75%. Lutsk's result was slightly lower but still notable at 64.7%. These achievements translated into 39.5 points for Chernivtsi, 39 points for Vinnytsia, and 33.5 points for Lutsk.

As for the criteria that have migrated to the ranking from 2023, Lutsk fully implemented 13 indicators among those that were problematic for it last year—that is, those where the level of implementation was designated as "partially implemented," "not implemented," or "impossible to assess." In Chernivtsi and Vinnytsia, the corresponding numbers of such indicators are 12 and 7, respectively.

However, the most significant improvement in transparency was observed not among cities that advanced from "partially transparent" to "transparent" status. The most notable breakthrough came from Zaporizhzhia, which increased its score by 27.3 percentage points compared to 2023 and achieved "partially transparent" status.

Unlike in the previous year, the municipality began distributing minutes of city council, executive committee, and standing committee meetings and promptly published video recordings of nearly all sessions of the city council and executive committee. It also made available lists of properties subject to and exempt from privatization, as well as a list of municipal land plots proposed for transfer to citizens and legal entities or for lease. The city council also published title lists for major and routine repairs, construction, reconstruction, and landscaping projects. The municipality also established clear criteria and grounds for the distribution of humanitarian (charitable) assistance and reported on the aid received in 2024.

The example of Zaporizhzhia demonstrates that with sufficient political will, transparency and accountability mechanisms can be successfully implemented, even in a city designated as a territory of potential hostilities and subjected to constant air raids.

As for the other municipalities classified as "partially transparent," each followed its own path to improvement. For Kolomyia and Varash, the introduction of new criteria posed challenges similar to those faced by Dnipro and Drohobych—72.2% and 65.2% of their completely unimplemented indicators, respectively, were newly added in 2024. Nevertheless, both city councils made notable progress in meeting the criteria that have been part of the study since 2023: Kolomyia improved transparency mechanisms in 12 areas, and Varash in 15.

Slavuta, which scored lower than Kolomyia and Varash, improved its performance on 11 indicators in 2024, facing roughly the same number of challenges with both new and previously existing criteria.

The three municipalities each held public hearings and made several documents publicly available: an Activity Plan for drafting regulations, a report on municipal property management, and a report on information request fulfillment. In addition, their official websites now feature dedicated sections for veterans, and city council-initiated projects are now registered in the DREAM digital ecosystem for accountable recovery management. In addition, unlike in 2023, all three cities published accurate lists of land-related decisions in the draft agendas of council meetings.

Transparency Ranking of cities in potential hostility areas

Among the cities designated as **territories of potential hostilities**, a comparison with 2023 is applicable for eight of them: Zaporizhzhia, Lozova, Marhanets, Mykolaiv, Okhtyrka, Sumy, Kharkiv, and Shostka. Hlukhiv and Zlatopil did not participate in last year's Transparency Ranking.

In 2024, frontline city councils demonstrated greater progress in improving their average transparency levels compared to the 78 city councils overall.

Table 2. Average transparency levels of cities that participated in the 2023 and 2024 rankings

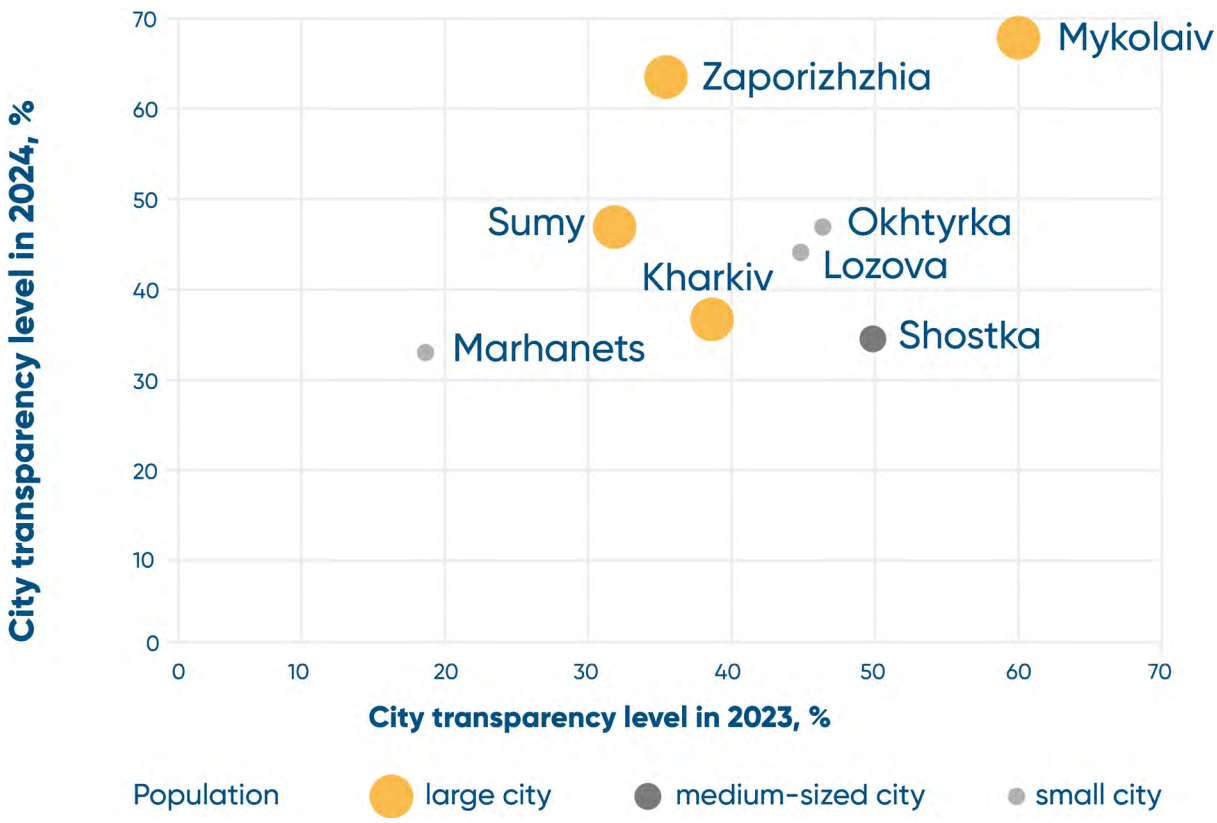
	Number of cities	**Average level of city transparency**	
		2023	**2024**
All cities	78	42.2%	45.4%
Cities in potential hostility zones	8	41.1%	46.9%

It is unlikely that a single factor explains this progress, as the cities in question differ significantly—in terms of human resources, budget capacity, presence or absence of established city military administrations, prior experience in EU Anti-Corruption Initiative projects or other major donor programs, and their ability (or inability) to publish open data on the Unified State Web Portal of Open Data in 2024. These cities are also led by different individuals—some demonstrating strong political will and experience in implementing openness initiatives, and others less so.

As noted above, the assessment resulted in a change of status for Zaporizhzhia and Shostka. Zaporizhzhia improved its score by 27.3 percentage points compared to 2023, achieving "partially transparent" status. In contrast, Shostka's score declined by 15.5 percentage points, causing it to lose this designation.

In addition to Zaporizhzhia, several other cities improved their performance: Sumy (+16.4 percentage points), Marhanets (+12.7), and Mykolaiv (+7.8). Okhtyrka maintained the same score as in 2023. Meanwhile, two cities from the region that experienced the highest number of air alarms in 2024—Kharkiv (-2.1 percentage points) and Lozova (-0.2)—showed slight declines in their results.

Relationship between transparency levels of 8 cities



Mykolaiv, which led among frontline cities in 2023, maintained its leadership in 2024, ranking seventh overall. The city council's systematic work in promoting transparency and accountability is evident, as the long-time participant in the Cities of Integrity Project encountered no significant difficulties in meeting the new indicators introduced in the methodology. In contrast, Shostka lacked such consistency. The absence of regular monitoring and implementation of transparency mechanisms was reflected in its performance, particularly in relation to the new criteria.

Table 3. Statistics on the implementation of 34 new indicators in frontline cities

City	Implemented	Partially implemented	Not implemented
Mykolaiv	**21**	7	**6**
Zaporizhzhia	18	5	11
Sumy	17	5	12
Okhtyrka	13	4	17
Marhanets	12	4	18
Lozova	12	3	19
Kharkiv	9	3	22
Shostka	**7**	3	**24**

In the context of the 36 indicators analyzed in both the 2023 and 2024 rankings, the **most significant progress** was observed in the performance of those related to:

- consistency between the executive committee's draft agenda and the issues considered during meetings (12.5% → 62.5%; Marhanets, Sumy, and Kharkiv did not publish any draft agendas or minutes of meetings);
- consistency between the list of issues in the agenda or decision to convene a session and the matters actually considered during the session (28.6% → 68.8%; not fully implemented only in Marhanets, where it was not possible to find the minutes of the sessions);
- accessibility of the official city council website for individuals with visual and other impairments (31.3% → 68.8%); full or partial implementation in all eight cities);
- publishing the lists of real estate objects that are subject to or not subject to privatization (7.1% → 43.8%; not fully implemented only by Marhanets, Mykolaiv, and Kharkiv);
- dissemination of title lists for major and current repairs, construction, reconstruction, and landscaping (0% → 31.3%; published in Zaporizhzhia, Lozova, and partially in Mykolaiv).

Despite the relatively high level of implementation of the indicator on the availability of official websites, it warrants a separate comment. During the assessment, analysts observed that the main page of the Kharkiv City Council website does not provide access to a search tool at all. In the Unified City Register of Regulations, the keyword search function does not work properly—results from even a detailed query return links to thousands of files spanning several decades. The search functions on the official websites of the Mykolaiv and Shostka city councils are present but non-functional.

Municipalities located in areas of potential hostilities demonstrated the **largest negative performance dynamics** in the following indicators:

- correct response to petitions submitted by citizens (80% → 25% ; no city council has fully implemented the indicator);
- availability of the local electronic registration system for municipal secondary school institutions, or a link to the national registration system (75% → 37.5%; no city offers a local registration system);
- publishing the up-to-date information on the location of municipally owned civil protection structures (87.5% → 62.5%; Marhanets and Lozova did not update the data in 2024, Mykolaiv and Shostka did not provide updates every six months);
- availability of an electronic tool for registering complaints and inquiries of citizens (87.5% → 62.5%; various reasons for non-fulfillment in Lozova, Okhtyrka, and Shostka);
- availability of the local electronic registration system for kindergartens, or a link to the national registration system (75% → 56.3%; all cities, except Lozova, redirect users to the national system).

Electronic auctions for the sale of rights to install seasonal trade facilities and temporary structures for business activities were not conducted in frontline cities either last year or in 2024.

Open data: what changed in 2024

Another important aspect of comparing the 2023 and 2024 results is the implementation of **indicators related to open data**, which are directly or indirectly based on Cabinet of Ministers of Ukraine Resolution No. 835 of October 21, 2015.

In 2023, there were 12 such indicators, and in 2024—10. The conditions for implementation were more complex. For example, instead of verifying the availability of a list of open datasets published on the official website—previously a requirement for local governments—the assessment focused on whether a formal Regulation/Procedure on open data had been approved, setting out the key aspects of the city council's approach to open data management. The new indicator was related to services/products based on datasets published by municipalities.

In 2024, analysts also relied on Article 10-1, Part 1 of the Law of Ukraine on Access to Public Information and verified the availability of public information in the form of open data both on the Unified State Open Data Web Portal and on the official websites of city councils. The data were required to be published in machine-readable formats such as XML, JSON, CSV, XLS(X), ODS, RDF, or YAML. The implementation conditions for these indicators were eased only for city councils in the Zaporizhzhia, Mykolaiv, and Kharkiv regions, where the Ministry of Digital Transformation of Ukraine had temporarily withdrawn datasets from public access.

The 2023 and 2024 studies shared six common indicators, which related to:

- lists of movable properties in municipal ownership *(11.7% → 23.1%)*;
- title lists for major and current repairs, construction, reconstruction, and landscaping *(30.8% → 33.3%)*;
- lists of land plots of municipal property offered for transfer to the ownership of citizens and legal entities or granted for use *(27.8% → 25.6%)*;
- lists of regulations *(64.7% → 48.7%)*;
- datasets on the registration of citizens in need of better housing conditions *(55.1% → 37.2%)*;
- information on the location of municipally-owned civil protection structures[7] *(86.1% → 64.1%)*.

As shown, only two indicators—data on movable property and title lists—demonstrated positive implementation dynamics compared to 2023. In contrast, the last two indicators declined so significantly that they ranked among the top in the anti-rating of indicators with the greatest negative dynamics *(see page 15)*.

Four out of 78 cities—Bila Tserkva, Vinnytsia, Kropyvnytskyi, and Lviv—fully met the conditions for all six indicators in 2024. This result is not surprising, as these cities have traditionally paid considerable attention to open data and operate their own portals for publishing datasets.

Ten municipalities—Bilhorod-Dnistrovskyi, Vyshneve, Irpin, Konotop, Lubny, Novovolynsk, Oleksandriia, Pryluky, Sarny, and Sambir—received zero points for all six indicators. Kyiv, along with 21 other cities, managed to fully implement only one of the six open data-related indicators.

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[7] The condition for implementing the indicator related to protective structures was the availability of up-to-date information, either in the form of a list or a map.

What (doesn't) affect(s) the city's transparency?

Do larger budgets, reduced exposure to shelling, or proximity to Europe truly influence progress in transparency? Analysts examined datasets to distinguish between genuine impact and superficial factors, aiming to identify the real drivers of change and understand how transparency is shaped by systematic governance, wartime conditions, and the adaptability of local authorities.

Does the city's transparency level depend on the population?

To compile the list of Ukraine's 100 largest cities by population, analysts used data provided by a national mobile operator. Kyiv had the largest recorded population at 3.13 million, while Zolotonosha had the smallest, with 26.16 thousand residents.

Kyiv's population is uniquely high compared to other Ukrainian cities, significantly influencing both the mean and standard deviation of the sample. Therefore, in analyzing the relationship between population size and transparency levels, data from 99 cities—all except Kyiv—were considered.

Table 4. Descriptive statistics of the sample

City population	With Kyiv	Without Kyiv
Mean	**166,826.60**	**136,877.36**
Median	50,021.50	47,908.00
Standard deviation	**366,863.79**	**212,958.82**
IQR	89,915.00	74,699.00

The calculation results indicate a moderate positive correlation between city population and its level of transparency[8].

According to analysts, city population may correlate with increased pressure on city councils from civil society activists and local media, as well as with greater public demand for transparency and accountability. Additionally, city population can influence both the availability and quality of potential personnel for local self-government bodies.

Does the city's transparency level depend on the city budget?

To analyze this correlation, data from Open Budget—the State web portal of the budget for citizens—were used. In 2024, Kyiv had the largest planned budget expenditures at UAH 108.09 billion, while Shakhtarske had the smallest, at UAH 314.74 million.

As in the previous case, Kyiv represents a unique outlier. Its budget expenditures significantly influence the sample's mean and standard deviation. Therefore, it was decided to consider the data of 99 cities again, as was done in the previous case, to study the relationship more accurately.

[8] The Pearson linear correlation coefficient was calculated. It is equal to 0.41, and the p-value is 0.00002.

Table 5. Descriptive statistics of the sample

Budget expenditures	With Kyiv	Without Kyiv
Mean	**3,690,872,966.32**	**2,636,344,324.80**
Median	1,014,928,199.64	1,003,527,961.45
Standard deviation	**11,370,577,806.14**	**4,274,521,613.93**
IQR	2,223,336,271.72	2,070,787,094.42

The results indicate **positive moderate correlation between city budget expenditures and the level of transparency[9].**

The financial capacity of city councils can influence the implementation of transparency practices such as developing proprietary tools for electronic registration in municipal preschool and secondary education institutions, establishing systems for electronic housing application registration, designing services based on open data sets (e.g. dashboards, interactive maps, chatbots, mobile or web applications), and preparing strategic documents.

Does the city's transparency level depend on the macroregion?

To identify this relationship, the following composition of macroregions was used:

- West: Volyn, Zakarpattia, Ivano-Frankivsk, Lviv, Rivne, Ternopil, and Chernivtsi regions;
- South: Mykolaiv and Odesa regions;
- North: Zhytomyr, Kyiv, Sumy, Chernihiv regions, as well as the city of Kyiv;
- East: Dnipropetrovsk, Zaporizhzhia, and Kharkiv regions;
- Center: Vinnytsia, Kirovohrad, Poltava, Khmelnytskyi, and Cherkasy regions.

First, we calculated key statistics for each macroregion, including the number of cities, the mean and the standard deviation of the transparency level.

Table 6. Statistics of macroregions

Macroregion	Number of cities	Mean of transparency level	Standard deviation of transparency level
West	28	48.41	20.41
South	9	36.11	16.65
North	26	38.48	12.54
East	14	41.96	14.60
Center	23	38.91	15.21

[9] The Pearson linear correlation coefficient was calculated. It is equal to 0.41, and the p-value is 0.00002.

Then the one-way analysis of variance (ANOVA) was used to test the hypothesis that there is no statistically significant difference between the means of transparency level across macroregions.

The test results are as follows:

	df	sum_sq	mean_sq	F	PR(>F)
Macroregion	4.0	1990.713211	497.678303	1.871881	0.121711
Residual	95.0	25257.714289	265.870677	NaN	NaN

PR(>F) shows the p-value of the test. It is equal to 0.1217 and is greater than 0.05. This means that there is no statistically significant difference between the macroregion means of transparency level.

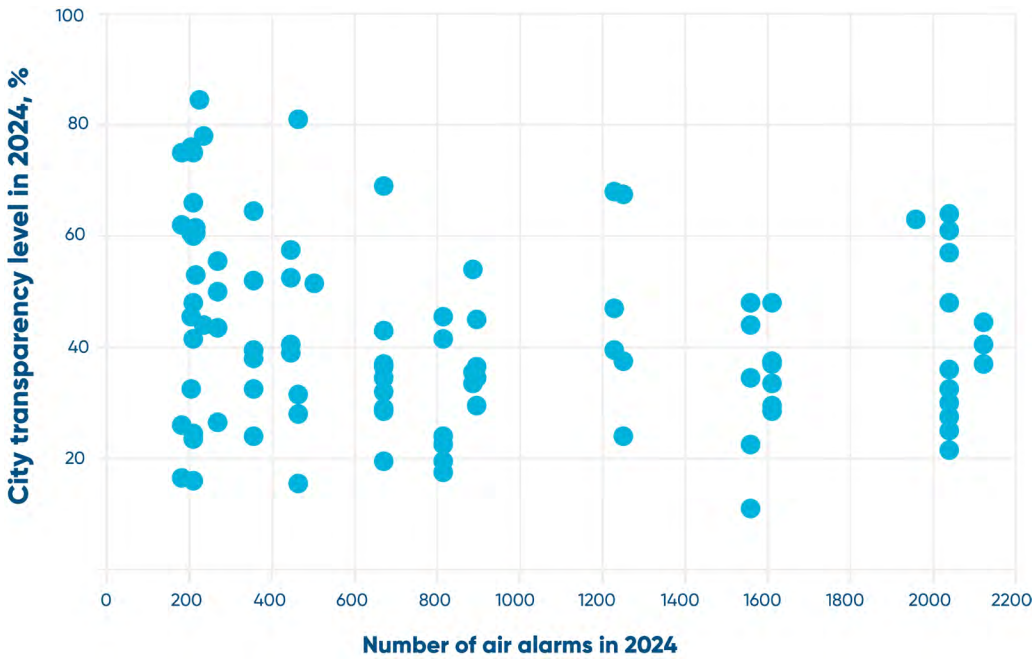
Does the city's transparency level depend on the intensity of air alarms?

The average level of transparency indicator implementation among the 10 cities located in territories of potential hostilities was 43.9%, compared to 41.4% among the other 90 cities.

To assess how proximity to the frontline affects transparency levels, analysts used regional air alarm statistics collected from the website Air-alarms.in.ua. In 2024, residents of Kharkiv region experienced the highest number of air alarms (2,122), while those in Zakarpattia recorded the lowest (181).

The calculations showed that the number of air alarms used by Russia to terrorize Ukrainian cities in 2024 had no measurable impact on the level of transparency[10].

Relationship between city transparency level and number of air alarms in 2024



[10] The Pearson linear correlation coefficient was calculated. It is equal to -0.14, and the p-value is 0.151929.

Does the level of transparency depend on prior participation in the Transparent Cities program's annual research?

A total of 100 city councils participated in the 2024 Transparency Ranking, 78 of which had also taken part in the previous year's study. The remaining 22 municipalities had not participated in the Transparency Ranking conducted by the Transparent Cities program since 2017. These cities are Berehove, Boryslav, Brody, Bucha, Vyshhorod, Hadiach, Hlukhiv, Zlatopil, Zolotonosha, Zolochiv, Kostopil, Mohyliv-Podilskyi, Novoiavorivsk, Obukhiv, Pereiaslav, Pivdenne, Synelnykove, Truskavets, Khmilnyk, Khust, Chortkiv, and Shakhtarske.

All newcomers, except Pereiaslav, are small towns with a population of up to 50 thousand residents. A total of 50 small towns participated in the study—29 with prior experience in the Rankings and 21 participating for the first time. The average indicator performance among "experienced" local self-government bodies was 36.8%, compared to 28.2% for first-time participants.

The calculations revealed a positive moderate correlation between the transparency level of a small town and its prior experience participating in the Transparency Ranking[11].

What do dependency calculations show?

These findings suggest that while the availability of human and financial resources does influence the level of transparency in city councils to some extent, there is no strong correlation. In 2024, 19 of the 21 regional centers ranked among the top cities. However, Mukachevo, despite having a population nine times smaller and planned budget expenditures ten times lower than Lviv, demonstrated a comparable level of transparency. Similarly, Slavuta, with a population of 35,000 and budget expenditures of UAH 448.64 million, outperformed Kyiv, Rivne, Sumy, and several other regional centers.

Participation in previous Transparency Rankings had a positive effect on the scores achieved during the assessment, although no strong correlation was observed. Only 3 of the 22 newcomer cities ranked in the upper half of the list. Notably, Chortkiv, a first-time participant, shared a high 38th place with Romny, surpassing 39 city councils that have been evaluated by the Transparent Cities program for many years.

Neither the macroregion to which a city belongs nor the intensity of air alarms had a significant impact on municipalities' positions in the Ranking. Notably, the greatest improvements compared to 2023 were achieved by Zaporizhzhia (+27.3 percentage points) and Chernivtsi (+27.1), while the most significant declines were recorded in Shostka (-15.5) and Drohobych (-14).

The **level of transparency in city councils appears to depend largely on the political will of local leadership, as well as the consistency and regularity of efforts to implement transparency mechanisms.**

Let's look at a specific example of medium-sized cities. The Drohobych City Council website uses the #Transparency tag, and the Mukachevo City Council website features tags such as Integrity and Transparency and Anti-Corruption Activities. A quick review of the materials published under these tags clearly illustrates why one city retained its "transparent" status in 2024, while the other did not.

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[11] The point-biserial correlation coefficient was calculated. It is equal to 0.4, and the p-value is 0.0045.

In Drohobych, unfortunately, improvements in transparency indicators have not been systemic, whereas Mukachevo has taken a consistent, methodical approach to this issue on a monthly basis.

In 2024, the leadership of Zaporizhzhia repeatedly emphasized that "transparency and accountability to the community is the guiding principle of the city government," and publicly stated the goal of entering the top ten of the Transparency Ranking by year's end. The results of the study confirmed that these efforts were not in vain. However, maintaining a leadership position requires the institutionalization of transparency: systematic work, effective coordination between relevant departments, and continuous monitoring of routine practices such as publishing documents, video recordings of meetings, open datasets, community reporting, holding hearings and surveys, responding to petitions, and so on.

Looking back: how city transparency in Ukraine evolved from 2017 to 2024

Key transparency lessons from eight years of research

- **Large cities are systemically transparent, but a city's size is not a verdict for a smaller municipality.** Large cities tend to be more transparent due to better capabilities, personnel, and oversight, but smaller cities with strong leadership can achieve the same high standards.

- **Financial resources do not guarantee transparency—what matters most are the priorities and political will of local authorities.** Over the past eight years, many medium-sized cities have outperformed wealthier counterparts, demonstrating that transparency is driven by commitment, not just funding.

- **Leadership requires proactivity—local self-government bodies that implement innovative practices and set new standards for transparency.** By going beyond minimum requirements, pioneering cities raise the overall bar for municipal transparency. In many cases, what begins as an innovative aproach to openness eventually evolves into a legal standard.

- **A full-scale war caused a sharp pullback in transparency, but cities showed resilience and partially recovered.** In 2022, the transparency of cities fell sharply (to an average of 37.5%), but in 2023-2024, cities partially restored openness, adapting to war conditions (to 42.3% and 41.6%, respectively).

- **Sustained attention to transparency is essential—without it, regression is inevitable.** The experience of various cities demonstrates that passivity or the restriction of transparency under martial law can quickly set local councils back. Some local self-government bodies lost up to a quarter of their points due to the deliberate curtailment of openness—losses that could have been avoided. The key lesson is that transparency is not a one-time achievement; it requires continuous commitment and ongoing development.

From 2017 to 2021, Ukrainian cities demonstrated a steady increase in transparency. The average transparency score of the 100 assessed cities rose from 29.9% in 2017 to 48.5% in 2021—an overall increase of 62.2% over five years. The most significant jump occurred after the first year of assessment, with city transparency improving by approximately 38% in 2018 compared to 2017 *(see Appendix 2).*

After that, the pace of transparency improvement slowed. From 2019 to 2021, the average transparency level increased by only 2–3 percentage points per year. This deceleration was largely due to the shift from implementing basic transparency measures to addressing more complex indicators, as well as updates to the methodology reflecting legislative changes. These included, in particular, the expansion of the list of open datasets required for publication by local self-government bodies, new obligations in the anti-corruption sector, enhanced public procurement requirements at the local level, and so on.

The year 2022 marked a turning point, with the average transparency level of cities dropping sharply to 37.5%, breaking the five-year trend of steady improvement. This decline was a direct result of Russia's full-scale invasion of Ukraine: some cities were under occupation or located in active war zones, while others suspended the publication of certain information due to heightened security risks.

By 2023, the average level of city transparency began to gradually recover, reaching 42.3%, and in 2024, it remained relatively stable at 41.6%. However, at the national level, **cities have yet to return to the transparency levels seen in 2021, highlighting the long-term impact of the full-scale war on the openness and accountability of local authorities.**

Over the entire eight-year period, large cities[12] consistently demonstrated the highest levels of transparency, despite a partial decline during the years of full-scale war. Their average transparency scores ranged from 38.5% in 2017 to 65.1% in 2021, and 59.1% in 2024. Medium-sized cities maintained average performance levels, scoring 29.3% in 2017, 45.1% in 2021, and 41.7% in 2024. Small towns remained the least transparent throughout the period, with average scores rising from 24.5% in 2017 to 40.2% in 2021, before declining to 33.2% in 2024.

It is important that the relationship between the size of a city and the level of its transparency can also be traced on the example of calculated correlation coefficients[13]. Over the course of all eight years, a moderate correlation was observed: the larger a city's population, the more likely it was to demonstrate a higher level of transparency, and vice versa.

However, this relationship is not linear and can be attributed to a range of factors. Local self-government bodies in large cities typically have greater administrative and human resources, enabling them to implement transparency and openness policies more effectively. Media and civil society organizations are usually more active in large cities, and the volume of citizen inquiries and demands is higher. Large cities also tend to participate more frequently in international or national initiatives where local authority transparency is a key requirement.

At the same time, it is important to emphasize that this trend is not absolute—small and medium-sized cities can also achieve high levels of transparency. However, doing so requires strong political will and systematic internal efforts by local self-government bodies to enhance their transparency and openness toward residents.

This conclusion is further supported by the analysis of the relationship between city transparency levels and the size of their annual budgets. For this purpose, we compared data from 2021, when cities achieved their highest transparency scores prior to the full-scale invasion, with the results from 2024. In 2021, there was a moderate correlation indicating that cities with larger budgets were somewhat more likely to demonstrate higher levels of transparency. By 2024, however, this relationship had weakened even further. The correlation coefficients[14] indicate that the volume of funds managed through the city budget has only a minimal impact on the transparency of municipal governance. In other words, the size of a city's budget is not a determining factor in its level of transparency.

This refutes the idea that only financially strong cities can be transparent. In reality, even smaller cities with limited resources can achieve transparency and accountability if local authorities demonstrate strong political will and consistently invest in transparency efforts—and if citizens actively demand transparency. **Ultimately, transparency is not a direct consequence of a large city budget, but rather the result of deliberate governance practices grounded in trust, openness, and the responsibility of local self-government bodies to their communities.**

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[12] A large city is defined as having a population of over 200,000; a medium-sized city, between 50,000 and 200,000; and a small city, up to 50,000 residents.

[13] Between 2017 and 2024, Pearson correlation coefficients ranged from 0.5 to 0.6, with p-values significantly below 0.05 (close to 0), indicating a stable, moderate correlation with high statistical significance. The correlation was calculated between relative population indicators—specifically, city categories (large, medium, and small)—and their corresponding levels of transparency.

[14] Pearson correlation coefficients were 0.44 in 2021 and 0.41 in 2024, with p-values significantly below 0.05 (close to 0), indicating a positive moderate correlation and high statistical significance. The correlation was calculated for 99 out of the 100 cities in the study sample, excluding Kyiv, whose data is considered an outlier due to its disproportionate impact on the mean and standard deviation.

Transparency levels of Ukrainian cities

For the past eight years, the Transparent Cities program has classified Ukrainian cities into various categories. To enable accurate comparison of transparency levels across all years, this study standardized the classification into three categories:

- "transparent" cities (those that achieved 75% or more implementation of transparency indicators);
- "partially transparent" cities (those that achieved 50 to 75% implementation of transparency indicators);
- "non-transparent" cities (those that achieved 50% or less implementation of transparency indicators)[15].

As the data show, city transparency in 2017 was extremely low: not a single city achieved 75% implementation of transparency indicators. Only six cities surpassed the 50% threshold, while the remaining 94 out of 100 were classified as "non-transparent." The highest score that year was just 57 out of 100 points, recorded by Lviv. However, by 2018, the situation had begun to improve—two cities crossed the 75% mark and entered the "transparent" category, while a quarter of cities achieved "partial transparency." The number of absolutely "non-transparent" municipalities decreased from 94 to 73 *(see Appendix 3)*.

Between 2019 and 2021, transparency at the local level showed steady progress. The average level of transparency increased consistently, by 62% over five years, as cities actively implemented recommendations and best practices, which was reflected in the rankings. By 2021, 11 cities (11%) had surpassed the 75% threshold and were classified as "transparent," while 40 cities achieved over 50%, placing them in the two highest transparency categories. For example, Mariupol—the top-ranking city in 2021—increased its transparency score from 28.1% to 91% over five years, while Mukachevo improved from 34.7% to 81.3% in the same period.

Despite the positive trends observed from 2017 to 2021, Russia's full-scale invasion of Ukraine in February 2022 resulted in a significant setback in municipal transparency. In 2022, only 3 out of 70 cities surpassed the 75% threshold for indicator implementation and were classified as "transparent" (Lviv, Dnipro, and Mukachevo). Another 10 city councils fell into the "partially transparent" category, while the vast majority—57 cities—were designated as "non-transparent."

Thus, the share of "transparent" cities fell from 11% in 2021 to only 4% in 2022, which was directly related to new wartime challenges. In 2023, the situation showed modest improvement: five cities (6% of the 80 assessed) achieved "transparent" status, while 23 cities (29%) were classified as "partially transparent." However, the remaining 52 cities (65%) did not reach the 50% transparency threshold. In 2024, the distribution changed only slightly: out of 100 cities, five (5%)[16] were recognized as "transparent," 22 (22%) as "partially transparent," and 72 (72%) remained in the "non-transparent" category.

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[15] Throughout this research, we apply this standardized classification of city transparency to the 2017–2024 period.

[16] Although Ternopil scored 78 points, the city was not granted «transparent» status and was excluded from the analysis based on a justified decision by Transparent Cities (Transparency International Ukraine).

Sustainable leaders in transparency 2017-2024

Based on the results of the Transparency Ranking from 2017 to 2024, we identified the top five most successful cities over the entire period. These cities were selected using a combination of three criteria: their overall level of transparency, the dynamics of their progress over the years, and the frequency with which they ranked among the top five transparency leaders annually. We are talking about **Lviv, Drohobych, Ternopil**[17]**, Mariupol and Vinnytsia.**

- **Lviv.** Lviv is the largest city among the transparency leaders and has demonstrated consistently high performance. It topped the first Transparency Ranking in 2017 and has appeared in the top five six times in total. Since 2020, Lviv's transparency level has remained between 75% and 85%. The city consistently ensures access to open data, maintains openness in the work of local self-government bodies, engages with the public, and publishes essential information on municipal property and the budget. The social sector and citizen services remain weaker areas for Lviv. However, the city stands out for its consistent fulfillment of most transparency indicators without significant gaps, maintaining its reputation as one of the most open municipalities in Ukraine.

- **Drohobych.** One of the most successful medium-sized cities, appearing in the annual leaderboard five times and becoming the first city in Ukraine to surpass 85% transparency in 2018. Through the implementation of IT solutions, such as an open budget platform, online inquiry systems, and a resident portal, the city set an example for others. Despite a decline in 2022 (49%), Drohobych rebounded in 2023, securing second place with 80%, reaffirming the consistency of its transparency reforms. Its key strength lies in the consistent implementation of indicators across various sectors, which has enabled it to maintain a high level of transparency even under crisis conditions. Drohobych's success has also demonstrated to other municipalities that smaller cities can achieve exemplary transparency outcomes.

- **Ternopil.** The city progressed from an "average" score of 33.5% in 2017 to high scores in subsequent years and, up to 2023, ranked among the transparency leaders four times.

- **Mariupol.** The city marked the most significant breakthrough in the transparency ranking: rising from 57th place in 2017 to first place in 2021, with a gain of over 60 points. Mariupol ranked among the top five transparency leaders four consecutive times, beginning in 2018, and topped the ranking twice. Its success was driven by the implementation of advanced transparency practices, including a geoportal, public budget platform, interactive municipal property map, transparent investment policies, and comprehensive e-services covering all areas of governance. Mariupol became a model of how a large industrial city can achieve the highest standards of openness. Unfortunately, due to the full-scale invasion and subsequent occupation in 2022, the city's participation in the study ceased, and the results of its titanic progress were nullified by Russian aggression. Nevertheless, the achievements of Ukrainian Mariupol remain a significant legacy and a benchmark for other municipalities, as well as for Ukraine's future reconstruction.

[17] Data for Ternopil are included up to and including 2023, as the city was not granted «transparent» status in 2024 in accordance with a justified decision by Transparent Cities (Transparency International Ukraine).

- **Vinnytsia.** The city has ranked among the top five in the annual transparency ranking four times, showing steady growth from 49% in 2017 to 81% in 2024. After a decline in the first year of the full-scale war (61.8% in 2022), the city quickly regained its position and has consistently improved its transparency level each year since. Vinnytsia performs well across nearly all areas and indicators assessed in the study. It stands out particularly in budget and procurement transparency, personnel policy and integrity, public engagement, and its response to wartime challenges. This systematic and balanced approach has secured Vinnytsia a stable position among the most successful municipalities in the ranking.

What example does the capital set? Kyiv's transparency over eight years

Despite its status as the capital, Kyiv has not emerged as a model of transparency. After a gradual increase in transparency from 51.5% in 2017 to 68.2% in 2020, the city lost its positive momentum. Since 2021, transparency levels have declined, and during the full-scale war, they stabilized only slightly above 51%. Kyiv has not appeared in the top five since 2017, and in 2024, it ranked just 26th, between Slavuta and Rivne.

Year after year, Kyiv continues to fall short of expectations for a capital city. In 2024, the Kyiv City Council and the Kyiv City Military Administration met fewer than half of the transparency indicators in key areas such as response to wartime challenges, municipal property and land management, HT policy, and integrity. The capital also performed poorly in ensuring transparency in citizen service delivery. Notably, this underperformance is not a new trend—it has been recurring over several assessment cycles.

Kyiv demonstrates only a basic level of transparency and rarely implements successful practices systematically. Unlike the ranking leaders that actively initiate changes, the capital often responds with delay. Nevertheless, the city maintains some more progressive areas, particularly in public engagement, budget and procurement transparency, and the openness of local self-government operations. The electronic platform Kyiv Digital, which offers access to municipal services, petitions, surveys, and vital information—particularly regarding shelters—is a noteworthy example of effective communication with residents under wartime conditions.

To catch up with the transparency leaders, Kyiv must actively improve performance across nearly all areas. The Kyiv City Council and the Kyiv City Military Administration possess the necessary resources and conditions to do so—what remains essential is the political will of the leadership and the coherence of their efforts. At the same time, it is important to consider the specific context and structure of the current metropolitan administration. Since the establishment of the Kyiv City Military Administration (KCMA) under martial law, the capital has effectively been governed by two parallel bodies with different leaders—the mayor and the head of the KCMA (KCSA). This dual structure creates ambiguity in the division of powers and complicates the implementation of a unified, transparent approach to city management, including clear accountability for results. In one way or another, Kyiv has not emerged as a transparency leader, and individual digital tools—such as the Kyiv Digital app—have not been sufficient to secure the city a high ranking.

Unchanging cities of transparency ranking

From 2017 to 2024, 69 Ukrainian cities remained constant participants in the Transparent Cities program and were studied annually. These cities showed a steady increase in transparency from 2017 to 2021, with the average level rising by an impressive 54%, from 31.6% to 48.8%. However, in 2022, the average dropped significantly, reflecting the impact of the full-scale war. The five-year growth period indicates sustained progress in transparency and openness practices at the local level prior to the onset of large-scale hostilities.

In 2022, the average transparency level of the 69 consistently studied cities dropped to 37.5%, returning to levels last seen between 2018 and 2019. This sharp decline can be attributed to the forced closure of data by local authorities and the redirection of city councils' focus toward security under wartime conditions. However, a recovery began in 2023, with the average rising to 42.3%, and continued in 2024, reaching 45%. Although this remains below the 2021 peak of 48.8%, these cities demonstrate a positive trend toward restoring and advancing transparency.

By 2021, the average level of transparency across all categories of consistently studied cities (large, medium, and small) had increased, though at varying rates. The 20 large cities improved from 40% in 2017 to 65.8% in 2021; the 25 medium-sized cities rose from 30.4% to 44.2%; and the 24 small towns advanced from 25.8% to 39.4%. As a result, large cities demonstrated a faster pace of transparency growth, with the gap between them and small towns widening from 14 to 26 percentage points *(see Appendix 5)*.

The full-scale war in 2022 caused a sharp decline in transparency across all categories of cities that continuously participated in the research. The largest drop was observed among large cities, whose average transparency score fell by 17 percentage points. This can be attributed to the fact that these cities had previously implemented more advanced transparency practices, many of which had to be temporarily suspended under martial law. In contrast, medium and small towns experienced smaller declines—8 to 9 percentage points—largely because their prior levels of transparency were lower, and many transparency practices and requirements had not yet been adopted.

In 2023–2024, all cities that had been assessed prior to the full-scale invasion began to regain their positions. Large cities continue to lead, reaching an average transparency level of 60.2% in 2024. Medium-sized cities have nearly returned to their pre-war levels—42.2% compared to 44.2% in 2021—while small towns still lag behind at 35.3%. Notably, some medium-sized cities, such as Drohobych and Mukachevo, have in previous years outperformed even large cities like Kyiv in terms of transparency. The experiences of various municipalities following the outbreak of full-scale war confirm that even small towns can uphold—or quickly restore—high standards of transparency.

Municipal administration sectors: transparency in 2017-2024

In 2017-2018, analysts assessed the transparency of 13 areas of municipal governance. The most implemented sectors were "Access and participation," "Information on the work of LSGBs," and "HR issues." This can be attributed to the relative ease of implementing certain requirements at the time, such as publishing decisions, reception schedules, and appointment notices. In contrast, the cities struggled most in the areas of "Housing policy" and "Social services."

In 2019-2021, when the number of sectors increased to 14, the improvement in the implementation of most areas of city administration became noticeable. The largest growth from 2019 to 2021 was demonstrated by the areas of "Social services," "Investment and economic development" and "Education."

The transparency of the areas of "Access and participation" and "Land use and construction policy" remained almost the same. And the biggest decline in transparency occurred in the areas of "Utilities," "HR issues," and "Procurement."

In 2023-2024, analysts assessed the transparency of cities in seven sectors adapted to wartime conditions[18]. In 2023, the most implemented sectors were "Procurement," "Responding to challenges of war," and "Information on the work of LSGBs." However, for 2024, the most successful areas were "Openness," "Interaction with the community," and "Responding to the challenges of war." And the areas that city councils performed the least were "Anti-corruption policy" and "Access and participation" in 2023, and "Services to citizens" and "Municipal property and land" in 2024.

Compliance with legal requirements vs best practices: trends for 2017-2024

In the early years of the research, cities made significant progress in both complying with legal requirements and adopting voluntary transparency practices, although the pace of improvement varied. In 2017, cities met an average of only 32.7% of legal requirements and 26.5% of best practices. By 2018, these figures had risen to 43.9% and 38.1%, respectively. While cities initially focused on strengthening compliance with regulatory obligations, they also began introducing additional measures to enhance openness.

After the start of a full-scale war, the cities focused on the "minimum program." Thus, in 2022, the implementation of legal requirements increased slightly (47.8%), while voluntary practices dropped to 27.8%[19]. A separate category was the combination of legal requirements and best practices, which accounted for 38.7% of cities. In other words, under the pressure of the war, city councils focused on fulfilling basic obligations (publishing what the law requires), and temporarily abandoned many additional activities.

In 2023 and 2024, the situation improved: the level of implementation of best practices increased to 35.6% and 37.2%, respectively. However, regulatory requirements are kept at almost the same level- more than 44%. The combined implementation of the law and best practices amounted to 46.2% in 2023 and 45% in 2024. Therefore, now cities are gradually restoring additional initiatives, although the balance between "mandatory" and "voluntary" is still far from full implementation.

It is important to note that some of the best practices have become legislative norms for local self-government bodies over the past eight years. In other words, the recommendations that the Transparent Cities program has been promoting at the local level since 2017 were subsequently consolidated at the national level. Here are some examples:

- **Municipal property.** Transparent electronic auctions for the transfer of municipal property were initially implemented by only a few cities, most notably, Mariupol. However, they became mandatory following the launch of Prozorro.Sale and the adoption of the sectoral Law of Ukraine on Leasing of State and Municipal Property in 2020. Today, this anti-corruption measure is a standard requirement for all local authorities.

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[18] The 2022 research methodology did not include a breakdown by areas of municipal administration, which were evaluated and analyzed separately in other periods of the study.

[19] This was also due to the specific methodology used in the 2022 study, which did not include a transparency ranking (no scoring was conducted), evaluated only 70 cities, and excluded frontline municipalities. The assessment was based on a shortened list of 40 indicators.

- **Openness of local self-government bodies.** Video broadcasts of meetings of the council and standing committees, the preservation of these records and publication for citizens began as voluntary initiatives of cities. Today, they are a legal requirement for all LGSB in accordance with Law of Ukraine on Local Self-Government in Ukraine.

- **Open data.** Initially, only a few local self-government bodies voluntarily published expanded datasets not required by law, such as those on municipal property, permits, and kindergarten waiting lists. Over time, this became mandatory for all: in 2021, the list of open data to be published by local authorities was significantly expanded by Resolution No. 407 of the Cabinet of Ministers of Ukraine, "On Amendments to Resolutions of the Cabinet of Ministers of Ukraine No. 835 of October 21, 2015, and No. 867 of November 30, 2016." What was once the practice of advanced cities has become the general standard.

Transparency in the context of full-scale war (2022–2024): key developments and trends

- **A sharp drop in transparency in 2022.** The average transparency level in cities fell to 37.5%, down from 48.5% in 2021. Only three cities retained the status of "transparent," while 57 out of 70 were classified as "non-transparent." This decline was driven by the full-scale war, the shift in local authorities' focus to security and humanitarian support, a shortened methodology with only 40 indicators, and the exclusion of several large cities that had previously demonstrated higher scores.

- **Adaptation and partial restoration of transparency in 2023.** The average level of transparency increased to 42.3%, the number of "transparent" cities rose to five, and the share of "non-transparent" cities decreased to 65%. This indicates that municipalities have gradually begun restoring their transparency. The methodology was updated to include 50 indicators across seven areas, including war-related criteria, which enabled city councils to demonstrate relevant actions, such as informing the public about internally displaced persons, humanitarian aid, and shelter availability.

- **Sample expansion and new participants in 2024.** The ranking once again covered 100 cities; however, the inclusion of new and less experienced municipalities slightly reduced the average transparency level to 41.6%, down from 42.3% in 2023. The share of "non-transparent" cities also increased to 72%, while the number of "transparent" cities remained unchanged at five. The average transparency rate among newly added cities was 28.2%, compared to 45.4% for cities that had previously participated in the study. This highlights a growing transparency gap: leading cities maintain relatively high levels even during wartime, while newer—mostly smaller—cities are only beginning to adapt.

- **Signs of stabilization and increased transparency in the future.** At the end of 2024, the average level of city transparency was 41.6%. Among the 69 communities that have participated in the assessment for all eight years, this figure rose to 45%, up from 37.5% in 2022. Frontline cities also demonstrated positive dynamics, with an average transparency level of 43.9%—exceeding the national average. This indicates that even during wartime, Ukrainian cities have not lost the foundation of transparency and continue to gradually restore openness and public trust.

Landmarks for cities

How the 2023 recommendations were implemented

In the Transparency Ranking 2023, the program issued a number of specific recommendations for city councils, the implementation of which was reviewed as part of the 2024 assessment. While some progress has been made, most recommendations still require further effort.

Among the key recommendations was **ensuring proper access for citizens to the work of the council and its bodies.** The program urged cities to broadcast and publish video recordings of meetings—a practice that city councils improved upon compared to 2023. Last year, only 37 out of 80 cities published all or most recordings of council sessions; in 2024, that number increased to 57 out of 100. The trend of more actively publishing recordings of council sessions than those of executive committee or standing committee meetings has continued. In 2024, 36 cities published more than 80% of executive committee meeting recordings, and 24 cities published more than 80% of standing committee recordings (compared to 24 and 16 cities, respectively, in the previous year). At the same time, 60 cities either did not publish videos of executive committee meetings at all or released less than 50% of the recordings, often citing the absence of a legal requirement. Notably, until February 2024, broadcasting meetings of city councils and their standing committees was not legally mandated—but the program recommended it as a best practice for open governance.

In terms of fully **announcing meetings of the city council and its bodies**, only a few cities met expectations: in 2024, just 13 out of 100 municipalities announced more than 90% of all meetings—only one more than in 2023. The majority (51 cities) announced meetings partially, either by notifying only one or two bodies or covering between 50% and 89% of all meetings. Still, this reflects some progress compared to 2023, when 45 out of 80 cities did not announce city council meetings at all.

Not all municipalities responded to the recommendation **to involve the public in the work of advisory bodies.** For example, in 2023, public representatives were included in the commissions responsible for granting compensation for damaged property in only 18 cities. In 2024, 36 cities met the indicator's requirement in full, with citizens making up more than one-third of the commission members. Internally displaced persons were properly represented in the IDP Council in 22 cities in 2023 and in 30 cities in 2024. In an additional 14 cities, IDPs made up more than half of the council members; however, the chairperson was a representative of the local self-government body. In 56 cities, internally displaced persons are not properly represented in these councils, despite their key role.

The Transparent Cities program also emphasized the importance of **enabling electronic applications for housing and educational services** to help residents better adapt to wartime challenges. After reviewing the websites of city councils and education departments, analysts identified 24 local online registration systems for preschool education institutions and four for general secondary education institutions. Additionally, 51 and 40 cities, respectively, provided links to national registration systems.

Equally important is the **online registration system for citizens in need of improved housing conditions**. This tool is available in 10 cities, the same number as in 2023. However, only seven of them—Drohobych, Ivano-Frankivsk, Kamianske, Ternopil, Khmelnytskyi, Chernivtsi, and Sheptytskyi—offer functionality that allows users to upload documents and track the status of their applications.

Among the program's recommendations was a call to create and **proactively maintain online platforms for communication between authorities and citizens.**

One such platform is the **electronic petition submission system,** where the program recommends publishing responses not only to petitions that receive the required number of signatures, but also to those that do not—treating them as citizen inquiries. In 2024, 24 cities responded to all submitted petitions, while 25 others responded only to those that met the signature threshold. At the same time, more than half of the verified city councils (51) either did not respond to any petitions or failed to publish a single petition in 2024—indicating low public awareness of this tool's availability. For comparison, in 2023, only 15 cities provided complete information on all petitions, while 42 out of 80 cities either did not respond or left the petition page unfilled.

Transparent Cities recommended that citizens be given the **opportunity to monitor the work of local authorities** through **regular reporting by mayors** and specialized divisions of the city council. Last year, 23 mayors reported and notified the public in advance. In 2024, only 21 mayors published their reports openly and in accordance with the one-business-day announcement deadline. Another 49 city leaders either published only text versions of their reports or failed to meet the announcement timeline (compared to 16 in 2023), while 30 mayors did not report on their activities for the current or previous year at all (down from 41 in 2023). Although the overall percentage of mayoral reporting increased compared to 2023, this improvement was driven primarily by the publication of text-only reports rather than public presentations.

Program analysts also reviewed the availability of **annual and quarterly budget performance reports.** Best practice involves publicly reporting on the implementation of the community budget for the previous year, with advance notice and a secure broadcast—an approach already adopted by 15 cities. Cities performed significantly better in quarterly reporting: 80 municipalities published at least three quarterly reports for 2024. This improvement is likely linked to the program's earlier monitoring; in 2023, it recommended that 13 cities adopt this practice, as they had not done so at the time.

The previous report also included recommendations related to the **management and accounting of municipal property.** The Program encouraged the cities to provide lists of all objects of movable and immovable property, as well as lists of municipal property available or not available for privatization. The list of movable property should be published within the open dataset titled "List of Municipal Property Objects"—a requirement currently met by only 13 city councils. This year, 15 municipalities followed the program's recommendation and published both lists of property—those subject to privatization and those not subject to privatization. For comparison, only five cities did so in 2023. Another 45 communities published only one of the lists—however, this still marks progress compared to 2023, when at least one list was published by just 33 cities.

Finally, in the area of "responding to the challenges of war," one of the key recommendations was to publish and regularly update the list of shelters—something 51 cities successfully implemented. In another 14 municipalities, the lists or maps of protective structures were current for 2024 but had not been updated at least once in the past six months. Unfortunately, 35 cities did not make any effort to publish or update this critical information.

Equally important for transparent governance in wartime conditions is the **publication of information on humanitarian aid received.** As in the previous year, analysts searched for comprehensive annual reports detailing the types and volumes of humanitarian aid, as well as publicly available criteria and principles for its distribution. In 2023, only five cities fully met the requirements of this indicator. In 2024, both documents were found in 10 cities: Drohobych, Zaporizhzhia, Kryvyi Rih, Lozova, Mykolaiv, Odesa, Pokrov, Ternopil, Chernivtsi, and Shostka. In another 15 cities, only the report for 2024 was available, without any distribution criteria—the same number as in 2023. The program also encourages city councils to publish a list of subordinate entities that receive humanitarian aid. In 2024, 12 cities took this step toward increasing public trust.

Sustainable transparency formula: recommendations for cities

Openness

The scope of openness covers the basic transparency requirements for the operations of the city council and its bodies, including the executive committee and standing committees. Based on the level of implementation of transparency indicators in this area in 2024, we recommend that city councils prioritize the following actions:

- **Regularly announce meetings of the city council, executive committee, and standing committees at least one day in advance, specifying the date, agenda, and a link to the broadcast.** This practice enhances the transparency of decision-making processes and allows the public to prepare in advance for participation or monitoring. However, the formal implementation of this obligation remains inconsistent, despite its grounding in both legal requirements and the best practices demonstrated by leading cities.

- **Ensure that video recordings of all meetings of the council, executive committee, and standing committees are broadcast and made public.** According to legal requirements, relevant video recordings must be published on the official websites of city councils no later than the following day. This is particularly important for ensuring accountability under wartime conditions, when citizens may be unable to attend meetings in person.

- **Ensure compliance between the previously published agendas and the actual course of meetings of the council and the executive committee.** It is essential that all matters to be considered at meetings are clearly defined in advance in administrative documents or agendas. This is a legal requirement that guarantees transparency in decision-making and helps prevent the manipulation of agendas through the inclusion of "unexpected" or "hidden" issues.

- **Publish complete and accessible lists of current regulations on the official website of the council, as well as on the state open data portal.** In the absence of this information, citizens cannot effectively monitor changes in local regulatory policies. This combines both the direct requirements of the law and the best practices of digital governance.

Some cities already demonstrate high standards of compliance with these transparency requirements, which may be adopted by other local self-government bodies. For example, **Chernivtsi** *systematically publish announcements of council meetings and its bodies, and Dnipro provides a structured information on the meetings of its city council, executive committee, and standing committees with all the necessary details. Volodymyr, Korosten, and Kamianske serve as examples of cities of various sizes that clearly align their agendas with actual decisions, demonstrating that compliance with the law is achievable regardless of the community's scale.*

Services to citizens

This area covers the availability of municipal services for residents – in terms of housing policy, education, and inclusivity. In 2024, this proved to be the least implemented area; therefore, we strongly recommend that city councils take the following actions as a priority:

- **Introduce an electronic system for housing application registration that enables residents to upload documents online and track the status of their applications.** This is particularly important in wartime, when displaced persons require rapid access to housing services. Such a tool represents best practice for local self-government bodies, as it significantly increases process transparency and helps eliminate subjectivity in the review of applications.

- **Publish information on the availability of infrastructure for people with disabilities**—both on the city council's official website and on the national open data portal. The law explicitly requires these datasets to be published in a machine-readable format, and non-compliance with this provision deprives low-mobility residents of access to essential information.

- **Implement and ensure the proper functioning of electronic registration systems in municipal educational institutions**—including both schools and kindergartens. Citizens should be able to submit applications online, monitor their position in the queue, and receive high-quality feedback to ensure transparency throughout the process. This is not only a matter of legal compliance but also an opportunity to adopt the best practices already implemented by leading Ukrainian cities.

Some cities have already implemented effective digital services that can serve as models for other local authorities. In particular, Ivano-Frankivsk and Sheptytskyi have developed user-friendly electronic housing registration systems that offer a full processing cycle. Ivano-Frankivsk and Uzhhorod also provide public access to machine-readable data on infrastructure availability, both on their official websites and on the national open data portal. In addition, Kropyvnytskyi and Uzhhorod have implemented user-friendly electronic registration systems for schools and kindergartens, which can serve as reference models for other cities.

HR policy and integrity

This area includes transparency in the selection, training and ethical conduct of local government officials, as well as measures to prevent corruption. In 2024, it is one of the least implemented, which indicates the urgent need for city councils to implement the recommendations that we provide below:

- **Develop and implement a local corruption prevention tool**—for example, an anti-corruption program or integrity plan. Such a document should identify key corruption risks and outline specific measures to address them, reflect the city council's commitment to accountability, and serve as a foundation for internal monitoring.

- **Appoint a dedicated body or official responsible for monitoring the ethical conduct of local government officials.** This function should be clearly defined to ensure not merely formal compliance, but effective oversight of adherence to ethical standards of behavior.

- **Conduct regular training for personnel of local self-government bodies** on transparency, integrity, and accountability. These training sessions should be systematically organized, with advance planning and proper documentation of topics covered and results achieved.

- **Publish complete and timely information about vacancies, job competitions, and internship opportunities for young people.** This includes constantly updating the relevant sections of the city council's website, easy navigation for candidates, and a clear ad structure. This practice not only provides openness, but also increases the attractiveness of working in local self-government bodies.

In the area of monitoring the ethical behavior of local authority officials, Vinnytsia serves as a positive example, where a dedicated ethics commission operates. Mukachevo has integrated this function into the work of its corruption prevention body. Romny and Sheptytskyi demonstrate a systematic approach to training officials, supported by high-quality documentation and reporting. Meanwhile, Chernivtsi, Boryslav, and Novovolynsk show that, regardless of the size of the community, it is possible to ensure transparency in personnel policy: these cities openly publish all up-to-date information about their staff.

Budget and procurement

This area encompasses the openness of the budget process, transparency in procurement, and the financial accountability of local governments. It includes the publication of budget performance reports, organization of budget hearings, transparency of regulatory policy, implementation of internal audits, price control in construction, and efforts to increase competition in procurement. In 2024, this sphere remains one of the key pillars for ensuring public oversight of community spending. Recommendations:

- **Publish on the official website of the city council detailed information about its structural divisions (departments, units, etc.), clearly indicating which of them serve as budget fund managers.** This structure should also include information on the subordination of municipal enterprises and institutions to the local self-government bodies. In all cases, the corresponding USREOU codes should be provided.

- Involve citizens in the budgeting process by **timely announcing and conducting open budget hearings.** While current legislation does not require local self-government bodies to hold such hearings, their existence is a vital element of the council's accountability to the public. During martial law, hearings may be held online, provided that public access and participation are ensured.

- Develop a **methodology for analyzing or monitoring prices for construction materials** to prevent transparency issues in procurement during the recovery process. It is also important to note that documents containing information on material prices are integral appendices to contracts for the procurement of services related to routine repairs, new construction, reconstruction, restoration, and major repairs of construction facilities.

- **Establish an independent body responsible for internal control and auditing of the activities of city council divisions, and ensure that the results of such inspections are publicly available.** Publishing these findings will help build public trust in local authorities and provide oversight of the effectiveness of the city council's operations and the use of budget funds.

When publishing the structure of budget fund managers and recipients, city councils are encouraged to follow the examples of Kyiv and Mykolaiv. For conducting open budget hearings, Mukachevo serves as a good practice example—ensuring announcements, live broadcasts, and publication of meeting minutes. In developing a methodology for monitoring prices of construction materials, Sheptytskyi offers a useful reference. For sharing information about the work of internal control and audit bodies overseeing city council divisions, the practices of Kyiv (publication of regulations and reports) and Kolomyia (publication of regulations and reports) can serve as models.

Municipal property and land

The results of the study on municipal property and land revealed that serious problems persist in the implementation of Resolution No. 835 of the Cabinet of Ministers of Ukraine, dated October 21, 2015. The low level of implementation of the relevant indicators could be explained by the conditions of martial law. However, in most cases, when municipalities do not publish open datasets, the results of three-part tests explaining the failure to publish certain sets can also not be found. The program recommends:

- **Publishing title lists for major and current repairs, construction, reconstruction, and improvement; a list of municipal land plots proposed for transfer to the ownership of citizens and legal entities or granted for use; a register of movable properties in municipal ownership.** Although ten years have passed since the resolution was adopted, it has yet to become routine practice for Ukrainian municipalities.

- If a city council believes that disclosing the information in question could cause significant harm that outweighs the public interest in its disclosure, it must **conduct the appropriate three-part test and publish the results on its official website.** Any decision to restrict access must be based on Article 6, Part 2 of the Law of Ukraine on Access to Public Information.

- **Arranging electronic auctions for the installation of seasonal trade facilities and small structures.** Their implementation is the best practice, which indicates a transparent property management process, reduces corruption risks and can be a source of additional revenues to local budgets.

We suggest that when publishing title lists for major and current repairs, construction, reconstruction, and improvement, municipalities follow the example of Volodymyr; for the list of municipal land plots proposed for transfer to the ownership of citizens and legal entities or granted for use, the example of Kropyvnytskyi; and for the register of movable properties in municipal ownership, the example of Mukachevo. When preparing for electronic auctions through Prozorro.Sale, municipalities can draw on the experience of Vinnytsia (temporary structures for business activities) and Kyiv (seasonal trade facilities).

Interaction with the community

Solving most problems in the field of interaction with the community does not require the involvement of large-scale financial and human resources. To strengthen dialogue with citizens and involve residents in decision-making processes, Transparent Cities recommends the following:

- **Ensure the smooth operation** of such an important communication platform between authorities and citizens as the **electronic petition submission system**. Petitions that do not gain the required number of votes shall be considered as electronic appeals of citizens, and responses to them must also be published.

- **Develop a clear procedure to ensure citizens' access to open plenary sessions of the city council.** Many municipalities assume that such a procedure is already outlined in the City Council Regulations. However, in practice, the Regulations rarely specify the procedure for access—most often, they only describe the grounds for it. Instead, the program recommends developing **clear instructions that define the conditions and process by which citizens can attend both offline and remote council meetings.** We also recommend that, if pre-registration is required, an **online form be developed to allow citizens to apply for participation.**

- **Publish announcements and minutes of meetings of the public commission on housing issues.** This commission is typically responsible for the preliminary review of applications for housing registration and allocation. Therefore, publishing comprehensive information about its activities can help build public trust in local self-government bodies.

- **Develop services based on open data sets published by local self-government bodies.** Creating maps of citizens' appeals, dashboards with data on preschool enrollment queues, voting records of council members, electronic petitions, participatory budgets, and other tools requires additional financial resources. However, such initiatives can significantly improve the availability of local-level statistics, enhance transparency, and offer user-friendly access in areas where independent data analysis would otherwise be time-consuming.

We suggest following good practices from other cities—for example, Uzhhorod's approach to responding to electronic petitions; Kyiv's publication of instructions for citizens on the conditions and procedures for attending offline council meetings; and Kropyvnytskyi's development of an online pre-registration form for participation in council sessions. Coverage of the work of the public commission on housing issues can be improved by drawing on the experience of Pokrov, while the development of services based on open data sets can follow the examples of Vinnytsia, Dnipro, Drohobych, Ivano-Frankivsk, Kyiv, and Kremenchuk.

Responding to the challenges of war

In 2024, in the context of responding to the challenges of war, the analysis included indicators related to the development of strategic documents, the distribution of humanitarian aid, and the allocation of reconstruction funds. We recommend that municipalities strengthen their efforts in these areas by implementing the following measures:

- **Develop and approve a municipal energy plan or an action plan for sustainable energy development and climate,** as ensuring the energy security of cities—especially under wartime conditions—is critically important.

- **Develop a plan for the restoration and development of the territorial community.** This will not only provide answers to questions of local development, but also ensure that the community's specific needs are considered in regional and national strategic planning.

- **Ensure transparent accounting and distribution of humanitarian aid coming to municipalities.** It is advisable to publish a list of aid recipients among the structural divisions of local self-government bodies, municipal enterprises, and institutions, indicating their full names and Unified State Register codes. **In addition, a regular reporting process should be established to disclose the types and amounts of assistance received.**

- **Disseminate information on decisions to provide compensation for damaged or destroyed real estate.** We recommend summarizing statistical data—such as the number of applications reviewed, approvals and rejections issued, and the amount of compensation provided—and regularly updating this information moving forward. We also recommend publishing the **relevant decisions of the commission on compensation** either on a dedicated page of the city council's official website or, at a minimum, as appendices to the executive committee's decisions that are based on the commission's conclusions.

When developing a Municipal Energy Plan or an Action Plan for Sustainable Energy Development and Climate, councils can draw on the experience of Sumy and Chernivtsi. In creating a Plan for the Restoration and Development of Territorial Communities, they can follow the example of Okhtyrka. For transparent reporting on humanitarian aid, we suggest examining the examples of Lozova and Zaporizhzhia. For the dissemination of information on decisions regarding compensation for damaged or destroyed property, the practices of Vinnytsia and Chernihiv can serve as useful models.

Closing remarks

Over the past eight years, the Transparent Cities program and its annual transparency assessments have served as a true guiding star for Ukrainian municipalities. Our mission has extended beyond monitoring and assigning scores—we have actively supported communities in their development. To this end, we provided training, created platforms for experience-sharing, celebrated achievements, offered constructive criticism, and often acted as a bridge between local authorities and residents. At the same time, we have systematically raised the bar for transparency—not for the sake of formality, but to genuinely contribute to improving the quality of life in cities.

And the results show that we succeeded. Throughout the implementation of the program, openness in many communities has evolved from an external requirement into an internal standard of governance. We have seen cities launch new online reporting tools, create user-friendly platforms for citizen engagement, and implement data-driven reforms. Dozens of municipalities have established practices of regular public reporting, transparent management of municipal property, and inclusive decision-making involving residents.

We are sincerely encouraged that a growing number of Ukrainian citizens are realizing their power to influence decisions that affect them. People are increasingly holding authorities accountable, demanding transparency, and advocating for the representation of their interests. At the same time, we fully recognize the difficult conditions under which local governments operate—limited resources, political pressure, and the constant need to make challenging, and at times unpopular, decisions.

For us, transparency is not just about numbers and indicators. It is, above all, about prioritizing people's interests, showing respect, being willing to listen, responding to community needs, and remaining open to change. Much of what we assess cannot be captured by simple metrics—it reflects a culture of interaction, trust, and shared purpose.

That is why we remain committed to fostering a culture of transparency and accountability—one in which facts are valued and not concealed, mistakes are acknowledged, needs are voiced in a timely manner, all stakeholders' interests are considered, and achievements are assessed objectively and honestly. After all, a transparent city is not just about open budgets or published property lists; it is, above all, about trust, responsibility, and mutual respect within communities.

Therefore, we will continue to measure transparency and accountability, changing some approaches to make it even more effective in the future.

Anastasiia Mszurok,
Chief Operating Officer

Appendixes

Appendix 1. Results of the city transparency assessment for 2017-2024

See the interactive versions of Appendices 2–6 on our website:

Appendix 2. Average level of city transparency in 2017-2024 (%)

Appendix 3. Number of cities by transparency category in the 2017–2024 rankings

Appendix 4. Transparency ranking leaders among Ukrainian cities, 2017–2024

Appendix 5. Average transparency level of 69 continuously assessed cities, 2017–2024 (%)

Appendix 6. City transparency study: key changes between 2017 and 2024

Results of the city transparency assessment for 2017-2024

City	Transparency Ranking 2017	Transparency Ranking 2018	Transparency Ranking 2019	Transparency Ranking 2020	Transparency Ranking 2021	Transparency study 2022	Transparency study 2023	Transparency Ranking 2024
Bakhmut	27,26	62,23	72,60	73,10	76,01			
Berdychiv	27,73	36,86	43,80	38,60	29,36			39
Berdiansk	39,19	46,76	47,40	46,70	43,94			
Berehove								26
Bila Tserkva	29,40	46,86	67,00	70,10	70,27			69
Bilhorod-Dnistrovskyi	34,70	57,68	45,60	38,20	37,14			17,5
Boryslav								41,5
Boryspil	27,70	29,59	43,00	39,20	43,76			29
Boiarka	15,61	41,99	40,50	37,30	31,89			36,5
Brovary	36,96	43,68	39,60	35,60	37,90			43
Brody								23,5
Bucha								28,5
Varash	27,66	38,40	40,00	46,70	43,10			55,5
Vasylkiv	18,86	33,96	37,40	31,60	29,12			32
Vyshhorod								36,5
Vyshneve	19,80	31,03	37,40	24,90	17,00			19,5
Vinnytsia	49,00	70,29	74,20	76,70	78,85			81
Volodymyr	34,58	44,58	49,60	71,60	70,71			60,5
Hadiach								29,5
Hlukhiv								22,5
Horishni Plavni	35,76	36,60	44,20	44,10	43,78			33,5
Dnipro	25,60	66,60	69,20	71,90	84,20			64
Drohobych	46,20	85,20	79,10	78,10	83,16			66
Druzhkivka	29,26	36,90	37,20	41,80	34,98			
Dubno	29,49	39,40	66,60	68,90	67,19			43,5
Dunaivtsi	11,33	36,23	41,40	55,50	55,31			
Enerhodar	32,56	58,20	54,60	47,30	43,47			
Zhytomyr	42,78	63,85	66,10	56,20	64,67			52,5
Zhmerynka	29,70	38,10	34,30	36,20	28,01			31,5
Zhovti Vody	19,74	31,86	28,70	28,60	27,70			30

City category: large, medium-sized, small

City status: transparent, partially transparent, non-transparent

City	Transparency Ranking 2017	Transparency Ranking 2018	Transparency Ranking 2019	Transparency Ranking 2020	Transparency Ranking 2021	Transparency study 2022	Transparency study 2023	Transparency Ranking 2024
Zaporizhzhia	26,03	40,76	55,90	51,80	53,75		●	63
Zviahel (Novohrad-Volynskyi)	35,60	42,20	42,40	38,80	44,03	●	●	40,5
Zlatopil (Pervomaiskyi)								40,5
Zolotonosha								29,5
Zolochiv								16
Ivano-Frankivsk	54,20	57,75	61,60	55,30	63,46	●	●	60,5
Izmail	20,59	24,20	23,70	18,30	15,63	●	●	22,5
Izium	21,09	31,20	31,30	34,10	30,30			
Irpin	22,13	33,63	39,70	41,80	42,98	●	●	34,5
Kalush	23,49	32,93	31,90	46,00	54,53	●	●	53
Kamianets-Podilskyi	32,38	38,60	41,70	41,60	49,10	●	●	39,5
Kamianske	26,50	47,40	71,70	74,90	78,00	●	●	61
Kakhovka	30,99	37,70	41,80	38,30	28,73			
Kyiv	51,50	60,50	64,00	68,20	59,13	●	●	51,5
Kovel	34,70	36,80	40,10	32,20	40,62	●	●	45,5
Kolomyia	18,33	24,13	55,50	66,50	66,78	●	●	61,5
Konotop	33,31	34,70	19,60	38,60	39,13	●	●	11
Korosten	33,33	43,93	55,80	55,60	51,48	●	●	57,5
Kostopil								26,5
Kostiantynivka	21,43	34,36	31,10	28,70	34,17			
Kramatorsk	33,41	44,16	45,30	49,30	46,55			
Kremenchuk	49,60	56,10	52,50	60,20	69,55	●	●	48
Kryvyi Rih	28,60	29,03	62,90	59,20	56,89		●	48
Kropyvnytskyi	55,96	61,50	55,30	53,00	62,49	●	●	67,5
Kupiansk	26,50	38,30	35,40	34,40	36,92			
Lyman	14,42	28,70	30,20	43,40	40,39			
Lysychansk	17,81	38,65	48,70	35,00	33,74			
Lozova	18,60	26,00	26,40	44,70	44,29		●	44,5
Lubny	15,53	21,03	32,50	36,10	39,56	●	●	28,5
Lutsk	44,16	52,82	51,40	60,90	62,41	●	●	76

City category: large, medium-sized, small

City status: transparent, partially transparent, non-transparent

City	Transparency Ranking 2017	Transparency Ranking 2018	Transparency Ranking 2019	Transparency Ranking 2020	Transparency Ranking 2021	Transparency study 2022	Transparency study 2023	Transparency Ranking 2024
Lviv	59,70	65,70	73,70	85,20	85,49			75
Marhanets	23,50	27,90	42,00	32,60	37,16			32,5
Mariupol	28,05	76,35	74,60	86,60	91,00			
Melitopol	29,20	54,33	54,60	51,60	55,57			
Mykolaiv	51,53	54,56	56,30	55,70	71,37			68
Myrhorod	31,59	34,00	48,90	43,80	44,21			37
Myrnohrad	9,93	31,20	36,70	45,40	39,96			
Mohyliv-Podilskyi								15,5
Mukachevo	34,70	39,50	65,00	65,90	81,30			75
Netishyn	32,41	40,70	39,50	45,80	44,66			38
Nizhyn	49,90	52,00	59,40	47,60	41,39			33,5
Nikopol	28,60	58,30	53,10	57,90	61,62			
Nova Kakhovka	36,30	33,23	37,40	35,80	37,53			
Novovolynsk	25,73	26,93	30,60	47,10	47,12			32,5
Novoiavorivsk								23,5
Obukhiv								37
Odesa	32,53	52,10	57,60	61,60	57,62			45,5
Oleksandriia	35,95	36,20	36,90	40,40	38,60			37,5
Okhtyrka	21,06	39,50	44,40	41,70	54,80			48
Pavlohrad	19,60	31,10	36,60	41,50	47,57			25
Pervomaisk	23,50	25,30	28,60	29,50	31,40			39,5
Pereiaslav								28,5
Pivdenne (Yuzhne)								19,5
Pivdennoukrainsk (Yuzhnoukrainsk)	28,60	43,40	32,80	37,50	39,94			47
Podilsk	20,06	18,00	21,40	22,80	21,43			24
Pokrov	18,30	67,95	79,10	74,90	78,60			57
Pokrovsk	22,40	27,57	57,20	61,10	48,62			
Poltava	23,49	30,30	47,80	44,40	37,90			37,5
Pryluky	35,03	35,50	47,00	39,50	40,22			35,5
Rivne	36,11	40,70	54,50	47,60	48,49			50
Romny	32,63	34,50	30,70	33,50	39,24			44

City category: large, medium-sized, small

City status: transparent, partially transparent, non-transparent

City	Transparency Ranking 2017	Transparency Ranking 2018	Transparency Ranking 2019	Transparency Ranking 2020	Transparency Ranking 2021	Transparency study 2022	Transparency study 2023	Transparency Ranking 2024
Rubizhne	31,71	32,71	39,70	48,20	49,63			
Samar (Novomoskovsk)	8,00	27,20	18,10	14,80	34,49	●	●	21,5
Sambir	20,93	25,66	25,70	27,90	23,62	●	●	24,5
Svitlovodsk	19,40	21,00	19,20	32,80	25,53	●	●	24
Severodonetsk	22,46	52,10	41,20	51,60	38,34			
Synelnykove								36
Slavuta	31,00	31,90	31,20	33,40	30,78	●	●	52
Sloviansk	16,70	36,80	44,10	53,70	41,80			
Smila	22,06	30,20	31,40	40,40	30,88	●	●	36,5
Starokostiantyniv	23,26	27,76	29,70	31,10	29,20	●	●	24
Stryi	16,40	17,70	20,10	21,90	25,80	●	●	48
Sumy	32,63	33,00	57,20	60,10	61,95	●	●	48
Ternopil	33,51	60,70	76,00	75,20	79,57	●	●	78
Truskavets								24,5
Uzhhorod	31,00	51,70	56,60	58,70	53,46	●	●	62
Uman	31,73	35,03	34,30	38,40	34,14	●	●	45
Fastiv	23,23	34,43	30,20	49,00	55,39	●	●	34,5
Kharkiv	32,23	32,40	42,80	48,90	52,73		●	37
Kherson	33,90	39,70	43,10	49,40	49,67			
Khmelnytskyi	41,20	56,20	64,70	68,00	76,16	●	●	64,5
Khmilnyk								28
Khust								16,5
Cherkasy	35,73	44,66	58,60	55,20	66,20	●	●	34,5
Chernivtsi	42,40	54,95	55,80	58,60	54,19	●	●	84,5
Chernihiv	34,60	52,90	56,20	56,10	56,03	●	●	54
Chornomorsk	38,78	44,86	39,80	49,50	53,99	●	●	41,5
Chortkiv								44
Shakhtarske (Pershotravensk)								27,5
Shepetivka	21,96	30,26	25,40	23,00	53,79	●	●	32,5
Sheptytskyi (Chervonohrad)	50,50	52,80	38,50	45,40	20,32	●	●	60
Shostka	28,43	37,73	35,80	34,00	44,19	●	●	34,5

City category: large, medium-sized, small

City status: transparent, partially transparent, non-transparent

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