

THE DYNAMICS OF TRANSPARENCY GROWTH:

How Ukrainian cities have changed
over the last two years

Analytical report on measuring the transparency
of the 100 biggest Ukrainian cities in 2017 and 2018

June 2019

Transparency International Ukraine is an accredited chapter of the global movement Transparency International with a comprehensive approach to development and implementation of change for reduction of the corruption levels.

Our Mission is to reduce the level of corruption in Ukraine by promoting transparency, accountability, and integrity of public authorities and civil society.

Transparent Cities Program

as a leader in promoting transparency and accountability, encouraging local governments and the public to fight corruption.

Through the disclosure of information necessary for citizens in an understandable form and through providing them with tools for real impact and participation in decision making, the level of transparency and accountability of local authorities increases.

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The Dynamics of Transparency Growth: how the Ukrainian cities have changed over the last two years

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The publication has been written as part of the project Building Transparency in Ukrainian Cities implemented with the support of the UN Democracy Fund. Ideas, conclusions and recommendations expressed in this publication belong to their authors and do not necessarily reflect the opinion of the directorate or the Board of Transparency International Ukraine. Distribution of this report for non-profit purposes is welcome.

**“ The 19th century was a century of empires,
the 20th century was a century of nations,
the 21st century will be a century of cities.**

Wellington Web (Mayor of Denver, USA, 1991-2003)

(from the book by Benjamin Barber

“If Mayors Ruled the World: Dysfunctional Nations, Rising Cities”)

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FACTS AND FIGURES

Below are key facts and figures: everything you need in order to understand how the biggest Ukrainian cities implemented transparency recommendations in 2018.

98 / 100

98 out of 100 cities improved their scores in the Transparency Ranking.

1 / 100

Only 1 out of 100 cities gained more than **80 points** and has the status of “transparent” according to our criteria.

12%

The transparency of cities increased **by 12% on average**.

40

The average transparency score in 2018 was **40** out of 100.

17

The lowest score increased **from 8 to 17**.

19

In order to climb in the rankings, cities had to implement approximately 19 new recommendations.

Housing policy

has remained the least transparent sphere of local governance for 2 years.

Access and participation

are the most transparent sphere of city council activities. The average city fulfilled **62% of recommendations** in this sphere.

44% / 38%

The average rate of compliance with legal requirements and good practices was 44% (24.6 points out of 56) and 38% (16.77 points out of 44), respectively.

INTRODUCTION

Almost 70% of Ukraine's population lives in cities.¹ More than 18 million live in the 100 biggest cities. From using administrative services, to social support, to school and kindergarten registration, to public events participant, over one third of the Ukrainians personally² have contact with local government agencies annually, and even bigger percentage engages with them in a written or online form.

Since 2014, the process of decentralization has been taking place in Ukraine, the goal of which is delegating of powers from state agencies to local government agencies. One of positive results gained due to the reform is increasing local budgets. Only in 2018 did the revenues of the biggest cities in Ukraine reach 235 billion hryvnias. Cities received a boost for their active development.

However, resource growth entails increased corruption risks. While more attention is given to transparency provisions for the national level government agencies, the local government agencies should not be ignored. Moreover, decentralization of authority and financial powers creates a societal demand for a transparent and accountable local government. It is easier to monitor the government at local level: the community sees quality of road repairs, who is appointed for posts, and how important decisions are made. Furthermore, the community takes part itself in forming and making decisions through different instruments: electronic petitions, local initiatives, calls, public hearings, participating in local government meetings, etc. That is why the transparency of local government is currently of great importance.

In this report, we will analyze how the biggest cities of Ukraine have changed during the "Transparent Cities" program from 2017 through 2018: what innovative practices were implemented, which spheres are the most transparent, what recommendations are easier to fulfill, and how the Ranking influenced competitiveness and dynamics of the cities. We will also determine why some communities actively changed their cities whereas others remained passive. What motivates them and which resources encourage or discourage a breakthrough?

"Transparent Cities" Program

Transparency International Ukraine (hereinafter – TI Ukraine), an accredited representative of the global Transparency International movement, is aimed at minimizing corruption risks at the local level, in particular, by increasing transparency and accountability of government agencies, as well as cultivating as many supporters as possible and creating conditions for their integration in an effective system.³ These are the goals to be implemented by the "Transparent Cities" Program⁴ (hereinafter "the Program"), which was initiated by TI Ukraine in 2017.

The main project of the Program is the Transparency Ranking of Ukrainian Cities (hereinafter "the Ranking"). This is an annually conducted compre-

hensive study of the level of transparency of local self-government organs by more than 90 indicators. Analysts measure the transparency of the 100 largest cities in the territory controlled by the Government of Ukraine across 13 spheres: information about the work of local authorities, access and engagement, procurement, housing policy, budget process, financial and material assistance and grants, social services, staffing issues, professional ethics and conflicts of interest, land use and building policy, utilities, communal property, and education. The transparency of the work of city councils in the sphere of investments and economic development is separately calculated.

The results of the Ranking are the basis for the improvement of the cities: we conduct seminars

¹ Ukraine State Statistics 2018. Number of the existing population in Ukraine.

http://database.ukrcensus.gov.ua/PXWEB2007/ukr/publ_new1/2018/zb_chnn2018.pdf

² Corruption in Ukraine: understanding, perception, currency. Report upon results of the polls for entrepreneurs, experts and population in general/ Author collective. – Kyiv: Vaite. – p.42

³ Transparency International Ukraine Strategy for 2019-2021.

<https://ti-ukraine.org/wp-content/uploads/2019/04/Stratehiya-2019-2021.pdf>

⁴ Web-site of the "Transparency Cities" Program. <https://transparentcities.in.ua/about/>

in the regions of Ukraine for the dissemination of best practices; organize partner exchanges of experience among local government officials; and arrange trainings for local activists to give them more opportunities to monitor the activities of city councils.

We believe that it is necessary to disseminate information for citizens in a manner they understand and that through providing them with tools to have a real impact and to participate in the decision-making process are important steps to tackle corruption at the local level.

The Definition of Transparency

Recognized international standards consider the right to information as one of the most basic human rights. This is stated in the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights, the United Nations Convention against Corruption, the Council of Europe Convention on Access to Official Documents. Paragraph 16.10 of the Sustainable Development Goals also provides for the right of the public to receive public information.

In 2007, the Conference of European Ministers Responsible for Local and Regional Governments, concluded and recommended the implementation of the Strategy for Innovation and Good Governance at the local level. As one of the 12 principles of good democratic governance at the local level, the Strategy recognizes openness and transparency — providing public access to information and promoting understanding of how local public activities are implemented.⁵

The openness of information on the activities of public authorities is one of the main criteria for recognizing an authority as accountable and transparent. Such an interpretation of transparency is enshrined in the legislation of Ukraine. For example, the Law of Ukraine “On Civil Service” provides that the public service is carried out in compliance with the principle of transparency. That is, information on the activities of a civil servant, except in the cases specified by the Constitution of Ukraine and the Laws of Ukraine, is open. Other normative acts also refer to disclosing or publishing information as the main criterion of transparency or openness. In turn, the basic law in the sphere of local self-government — the Law of Ukraine “On Local Self-Government in Ukraine” — does not mention

the concept of “transparency” at all. Article 4 of this law, however, provides that local self-government in Ukraine is carried out on the principles of openness and accountability to the territorial communities of their bodies and officials.

The Program’s methodology is based on a broader understanding of transparency. According to our belief, the principle of transparency is realized not only through active publishing and providing passive access to information, but also through the organization of local government activities through open procedures (public meetings, open distribution places in pre-school establishments, etc.).⁶

Therefore, for the purposes of this report, transparency should be understood as the state in which citizens are guaranteed the right and ability to have access to information, their understanding of the decision-making process through involvement in the formulation and implementation of policies, and the authorities, aware of the importance of revealing of information and public engagement, take a proactive position in this process.

⁵ Unofficial translation of the Innovation and Good Governance Strategy at the local level recommended for implementation at the 15th session of the Conference of European Ministers responsible for Local and Regional Governance (Valencia, 15-16 October 2007): http://www.slq-coe.org.ua/wp-content/uploads/2015/05/Strategy_for_Innovation.pdf

⁶ Wenger V. 2017. Transparency as the principle of the activities of public authorities. Scientific Notes of NaUKMA Volume 200, Legal Sciences. - K., 2017. - p. 79-84.

MEASURING MUNICIPAL TRANSPARENCY

The International Experience

Measuring local authorities' transparency is a relatively new trend around the world. One of the initiatives that caused this trend was a study called "Open Local Government" conducted by **TI Slovakia**. Built on its foundation, the ranking evaluated the openness, value, and volume of information revealed by the municipalities of the 100 biggest cities in the country. The Slovak chapter of TI has recently published a new ranking of the transparency of municipalities. Compared to 2010, the level of transparency managed to increase from 40% to 57% on average. In addition, the ranking gradually influenced the local policy agenda. In 2017, the transparency of municipalities became the main theme of the election run for candidates for the presidency of the regions (krai).⁷ Based on the Slovak experience, analysts from different parts of the world have developed their own methods adapted to the local context.

In **Israel**, the Municipal Transparency ranking presented by TI Israel has become a benchmark for policy development at the national level. The Local Ministry of the Internal Affairs has used the Transparency Index of local authorities' websites to assess the future results of its work towards improving the quality of local government.⁸

In **Spain**, the Transparency Index of Municipalities is published annually, which measures the level of transparency of the 110 largest municipalities⁹ in the country. Over time, the index became a true brand. Most municipalities have created a special

section devoted to transparency on their websites, with separate information on indicators. The average transparency indicator increased by more than 72%.¹⁰ In the neighboring **Portugal**, the Municipal Transparency Index¹¹ has been calculated and published since 2013.

A similar idea was borrowed in 2016 by a representative office of TI in **Austria**.¹² The local index measures the transparency of local authorities in the 50 biggest cities in the country. The ranking is based on the assessment of the completeness, clarity, and accessibility of information on official websites. Following the results of the first year, Vienna received the top spot in the ranking. However, the true discovery became the small fair town of Perchtoldsdorf, which occupied the 6th place. In general, most Austrian cities cannot boast about high ranks. The average percentage of recommendations fulfillment was only 33%.¹³

Inspired by the example of Austria, Portugal, Slovakia, and Ukraine, TI activists in **Ireland** developed a comprehensive National Integrity Index,¹⁴ which covered three criteria: transparency, accountability, and ethics. The researchers concluded that local councils should publish more information, especially on tenders, costs, and donations. In addition, the councils focused on the implementation of mandatory standards and turned out to be rather passive in implementing best practices.¹⁵

The evaluation of the openness of local government in **Canada** encompasses the 68 largest municipalities representing 61% of the country's population.

⁷ Transparency International Slovensko: <https://transparency.sk/en/temy/samosprava/>

⁸ Transparency International Israel – Shvil: <http://www.ti-israel.org/local-municipalities-index/>

⁹ Transparency Index of Municipalities: <https://transparencia.org.es/en/index-of-municipalities-ita/>

¹⁰ García Santamaría, J.V. and Martín Matallana, J. 2017. Municipal Transparency in Spain: Analysis of the Most Influential Factors. *Revista Latina de Comunicación Social*, 72, pp. 1148-1164.

¹¹ Da Cruz, N. F., Tavares, A. F., Marques, R. C., Jorge, S. and de Sousa, L. 2016. Measuring Local Government Transparency. *Public Management Review*, 18(6), pp. 866-893.

¹² Transparency International Austria: <https://www.ti-austria.at/was-wir-tun/antikorruptions-projekte/projekt-transparente-gemeinde/index-transparente-gemeinde/>

¹³ Transparency International Austria. 2018. Analysebericht. Transparente Gemeinde 2019. <https://www.ti-austria.at/wp-content/uploads/2018/08/Index-Transparente-Gemeinde-2017-Analysebericht.pdf.pdf>

¹⁴ Transparency International Ireland: <https://www.transparency.ie/resources/national-integrity-index>

¹⁵ Transparency International Ireland. 2018. National Integrity Index 2018: Local Authorities: https://transparency.ie/sites/default/files/18.05.14_nii_report_vf.3_web.pdf

The index of open cities has shown that the average openness index is 43%.¹⁶

Why did anti-corruption organizations investigate the transparency of local authorities and publish rankings? There are several reasons for this.

First, **by increasing financial and authority powers at the local level, this increases corruption risks.** Corruption at the local level, particularly in the urban environment, was often left out of focus. For a long time, the efforts of major players in the fight against corruption have been directed at global initiatives, with the hope that they will affect the local level. However, this rarely produced the desired result.¹⁷ With the spread of the process of decentralization of power and the delegation of powers from the national to the regional and local levels throughout the world, the associated corruption risks have become a topic for discussion. In particular, the focus had centered on the freedom of discretion of local officials' significant increases in financial resources, and frequent contact of officials by citizens in the provision of services. This forced activists and officials to discuss the need for a special approach to tackling corruption at the local level.

Secondly, **a standardized approach to the assessment ensures balance, objectivity and the opportunity for an open exchange of best prac-**

tices. Rankings are based on transparent methodology and clear indicators, and can therefore be used to find best practices. Often local government agencies lack qualified personnel and resources to develop their own solutions. The ranking offers opportunities for sharing experiences, borrowing ideas and practices. It simplifies and speeds up the path to change. Another advantage of the scientific approach to the assessment of transparency is its impartiality. In this case, all cities have the same evaluation criteria, so the influence of subjective factors is minimal.

Thirdly, **there is an effect of competition.** The rankings are said to create social pressure and an impetus for local authorities to compete to get a higher position in the Ranking. Ambitious mayors want to get higher positions in the Ranking, because it affects their reputation in the community and beyond it. In addition, transparency has an impact on the success of cities. Open cities attract more investment, increase the quality of management and trust in the authorities, and make the cities more comfortable for its citizens.

Ukraine is not an exception in this trend as well. Since 2017, TI Ukraine has evaluated the transparency of the 100 biggest cities in Ukraine, encouraging city councils to make information public and engage the public in decision-making process.

The Transparency Ranking of the 100 Biggest Ukrainian Cities

The methodology for the assessment of the transparency of city councils in 100 biggest cities in Ukraine is based on the methodology developed by TI Slovakia and adapted by TI Ukraine together with the Institute for Political Education. Each city in the Ranking receives a final score (maximum of 100 points), which is based on the sum of points for 91 indicators. In turn, the indicators are spread across the 13 thematic spheres.

In 2018, the methodology for measuring all indicators (with the exception of education) was revised. Most of the changes were made to improve the accuracy of expert assessments, and to adapt

the methodology to new legislative requirements and good practices. Thus, the changes, if they took place, had a minor corrective effect on the urban indicators in 2017 and 2018, and provided an opportunity to assess the dynamics of the results of city councils over two years.

In general, several types of changes we have made to the ranking methodology can be summarized as follows.

1. Standardized the period during which the evaluation is carried out. Referring to a specific year has been replaced by more versatile periods: last year, previous year, active year, current year, proceeding year, last three

¹⁶ Public Sector Digest. 2017. Open Cities Index Results 2017: <https://publicsectordigest.com/open-cities-index-results-2017>

¹⁷ Shenker, J. 2016. Which Are the Most Corrupt Cities in the World? The Guardian: <https://www.theguardian.com/cities/2016/jun/21/which-most-corrupt-cities-in-world>

¹⁸ Методологія рейтингування прозорості міст: <https://transparentcities.in.ua/metodolohiya/>

years, etc. Such changes are due to the desire to make the methodology more sustainable and suitable for use in the long run.

2. Supplemented the list of evaluation methods. We added another source of data to the six indicator methods. These are citizens' complaints, court decisions, information in reputable mass media, public information in databases, as well as documents from public organizations and local council deputies confirming or denying the rules or practices of the application of legal acts.

3. Clarified the meaning of the concepts: indicated their definition or gave an indicative list of examples that should be taken into account when measuring the indicator.

For example, indicators A16035 and A16105 define that it is necessary to understand the terms "residential buildings" and "participation" respectively. Instead, the A16051 indicator is complemented by examples of civil society institutions, while A16023 is a kind of data formats that can be considered machine-readable.

4. Clarified the system of scoring points. One of the most significant changes is the introduction of a two-stage system of scoring for the four indicators of the "Procurement" sphere - A16091, A16093, A16099, A16100. This allows for separate assessment of the completeness and formatting of the published data. Other innovations in the evaluation system relate to the introduction of new or separate intermediate scores. Despite this, the weight of any individual indicator has not changed.

5. Replaced the indicator.

In only one case, the indicator was removed and replaced with a new one. Instead of having a procurement archive for the past 3 years, annual procurement plans, or a link to a portal of an authorized body where this information can be found, the indicator A16024 assesses whether a local regulatory document has been adopted in reference to the need for a public service to respond promptly to complaints, suggestions, and appeals.

6. Specified the formulation of questions and evaluation criteria.

Other changes, for the most part, are editorial in nature and were proposed in response to the feedback of city councils, activists, experts, and journalists on searching for information, the publication of which could help to prevent corruption at the local level.

In addition, in 2018 a new, 14th area - "Investments and Economic Development" was proposed, which includes 17 indicators. However, indicators in this area are not taken into account when calculating the overall city ranking.

To qualitatively measure the transparency of cities in this report, we use the following scale:

Table 1. Scale of city transparency depending on the total score

Non-transparent city	0-19 points
Mostly non-transparent city	20-39 points
Partially transparent city	40-59 points
Mostly transparent city	60-79 points
Transparent city	80-100 points

¹⁹ Lindstedt, C. and Naurin, D. 2010. Transparency is not Enough: Making Transparency Effective in Reducing Corruption. *International Political Science Review*, 31(3), pp. 301-322.

Limits of Methodology

Estimating the transparency of cities has its methodological shortcomings, which is practically impossible to avoid. First of all, the ranking methodology of the 100 biggest Ukrainian cities by their level of transparency **does not directly measure the accountability of local governments or their level of corruption**. Revealing of information and open decision-making process only will not help to prevent corruption¹⁹. We are aware of cases where, even in the most transparent cities, local activists faced with numerous obstacles when trying to get to a session of the city council. However, in combination with professional media, an impartial judiciary, free and fair elections, as well as a community that is active and ready for public policy change, transparency can bring results.

In addition, **this study is limited by timeframe**. Analysts assessed the level of transparency of city councils at the end of 2018. Perhaps, by the time of publication of the report, the city councils were able to implement more changes. These efforts will be taken into account in the interim analysis of the ratings with the updated results for the cities.

We also recognize **that legislation has undergone some changes** since the last evaluation of cities. For example, in April 2019, the Government substantially expanded the list of data sets that are subject to mandatory disclosure in accordance with the “Provision on Data Sets to be Made Public in the Form of Open Data,” approved by the Cabinet of Ministers of Ukraine from October 21, 2015, No. 835. This, in particular, means that some of the indicators previously used by local governments for best practices are already legally binding.

However, we believe that these restrictions generally did not have a significant impact on city scores.

²⁰ Association of Ukrainian Cities. 2019. Local governments will publish more open data:

<https://www.auc.org.ua/novyna/organy-miscevogo-samovryaduvannya-publikuvatymut-bilshe-vidkrytyh-danyh>.

THE DYNAMICS OF TRANSPARENCY GROWTH: How Ukrainian cities have changed over the last two years

It's evident that our experience of encouraging local governments towards transparency can already be deemed successful. Over the period of 2017-2018, the average indicators of transparency increased by 12% on average and now stand around 40 points. The lowest score increased from 8 to 17.7 points (Figure 1).

The competition among cities is growing. Whereas a score of 59.7 points was enough for becoming the leader of the 2017 Ranking, the top scoring city in 2018 was more than 85. Because the ranking of the city is determined in relation to other cities, improvement in a few indicators was not enough for moving up in the Ranking. To move up the Ranking in 2018, one had to earn about 21 additional points, which is equivalent to fulfilling 19 recommendations in a year.

Comparison of 2017 and 2018 Indicators

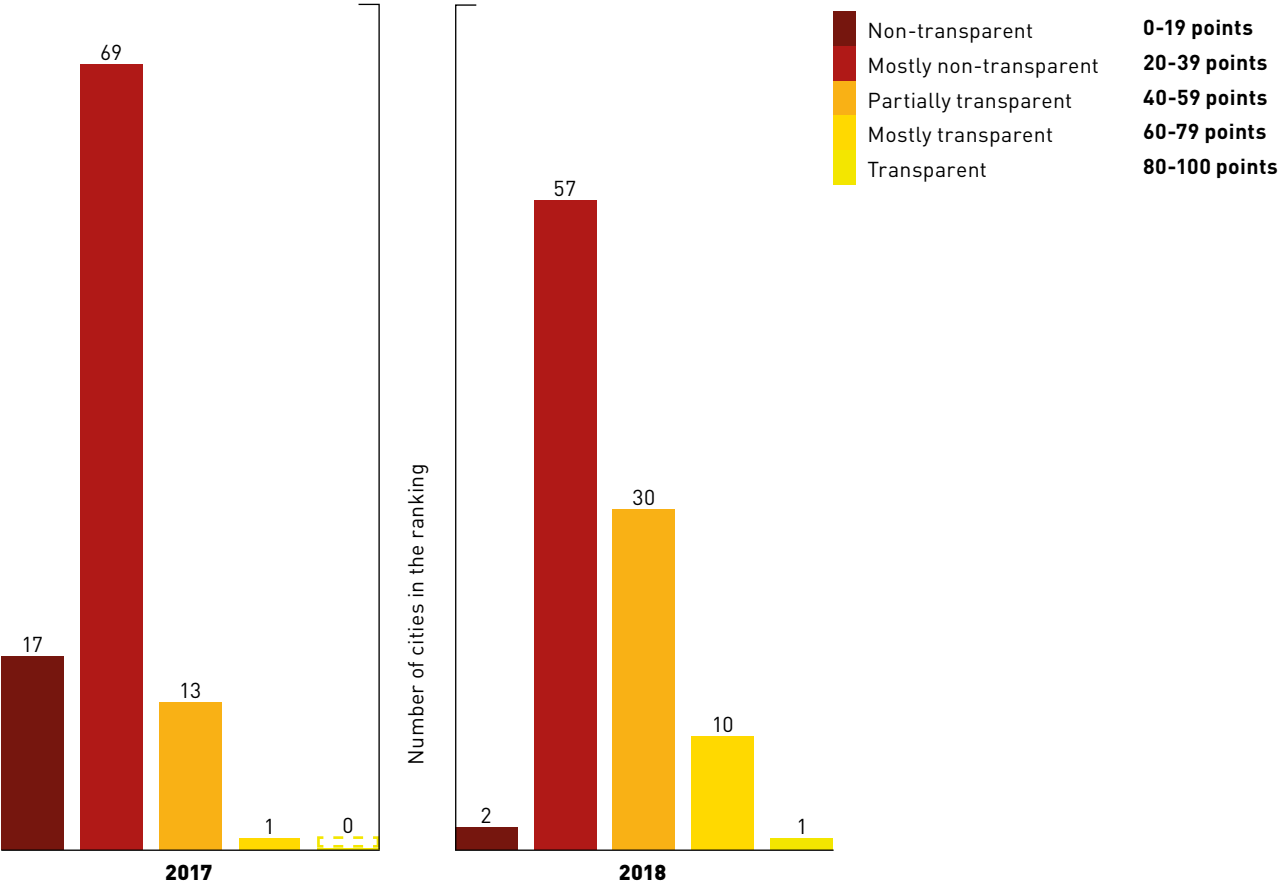
The main achievement of the 2018 Ranking is an **average increase of the city councils' transparency by more than 12%**. Considering that the average transparency score of the cities barely reached 30 points in 2017, it is remarkable that it surpassed 40 points a year later in 2018.



Most cities in the Ranking still hold a status of “mostly non-transparent.” Yet, the number of cities in the “non-transparent” category decreased from 17 down to 2. More so, one city (**Drohobych** in Lviv Oblast) crossed the 80-point mark, and accordingly transitioned into the category “transparent.”

Figure 2 shows the number of cities that belonged to one category or another in 2017-2018.

Figure 2. Distribution of the number of cities by the transparency scale in 2017 and 2018



Below is the 2018 listing of cities as they were categorized.

Table 2. Cities based on level of transparency in 2018

Non-transparent	Podilsk	Stryi		
Mostly non-transparent	Bakhmut Berdychiv Boryspil Varash Vasylkiv Vyshneve Horishni Plavni Druzhkivka Dubno Dunaivtsi Zhmerynka Zhovti Vody Izmail Izyum Irpin	Kalush Kamianets-Podilskyi Kakhovka Kovel Kolomyia Konotop Kostiantynivka Kupiansk Lyman Lysychansk Lozova Lubny Marhanets Myrhorod Myrnohrad	Mukachevo Netishyn Nova Kakhovka Novovolynsk Novomoskovsk Oleksandriya Okhtyrka Pavlohrad Pervomaisk Pokrovsk Poltava Pryluky Romny Rubizhne Sambir	Svitlovodsk Slavuta Sloviansk Smila Starokostiantyniv Uman Fastiv Kharkiv Kherson Shepetivka Shostka Yuzhnoukrainsk
Partially transparent	Berdiansk Bila Tserkva Bilhorod-Dnistrovskyi Boyarka Brovary Volodymyr-Volynsky Enerhodar Zaporizhzhia	Ivano-Frankivsk Kamianske Korosten Kramatorsk Kremenchuk Kryvyi Rih Luts'k Melitopol Mykolaiv	Nizhyn Nikopol Novohrad-Volynskyi Odesa Rivne Sievierodonetsk Sumy Uzghorod Chervonohrad	Cherkasy Chernivtsi Chernihiv Chornomorsk
Mostly transparent	Vinnytsia Dnipro Zhytomyr	Kyiv Kropyvnytskyi Lviv	Mariupol Pokrov Ternopil	Khmelnytskyi
Transparent	Drohobych			

On average, cities improved their scores by about 12 points. Yet, cities like Nova Kakhovka and Podilsk showed a downward shift, respectively receiving 3.07 and 2.06 less points compared to 2017.

The analysis of the Ranking shows an interesting tendency. Despite the fact, as shown by Figure 3, that scores of most cities (except for Podilsk and Nova Kakhovka) improved, **only 41 cities moved up the ranking. The other cities fell by 15 positions on average.** What should we make of that?



Figure 3. City positions in the Ranking in 2017 and 2018



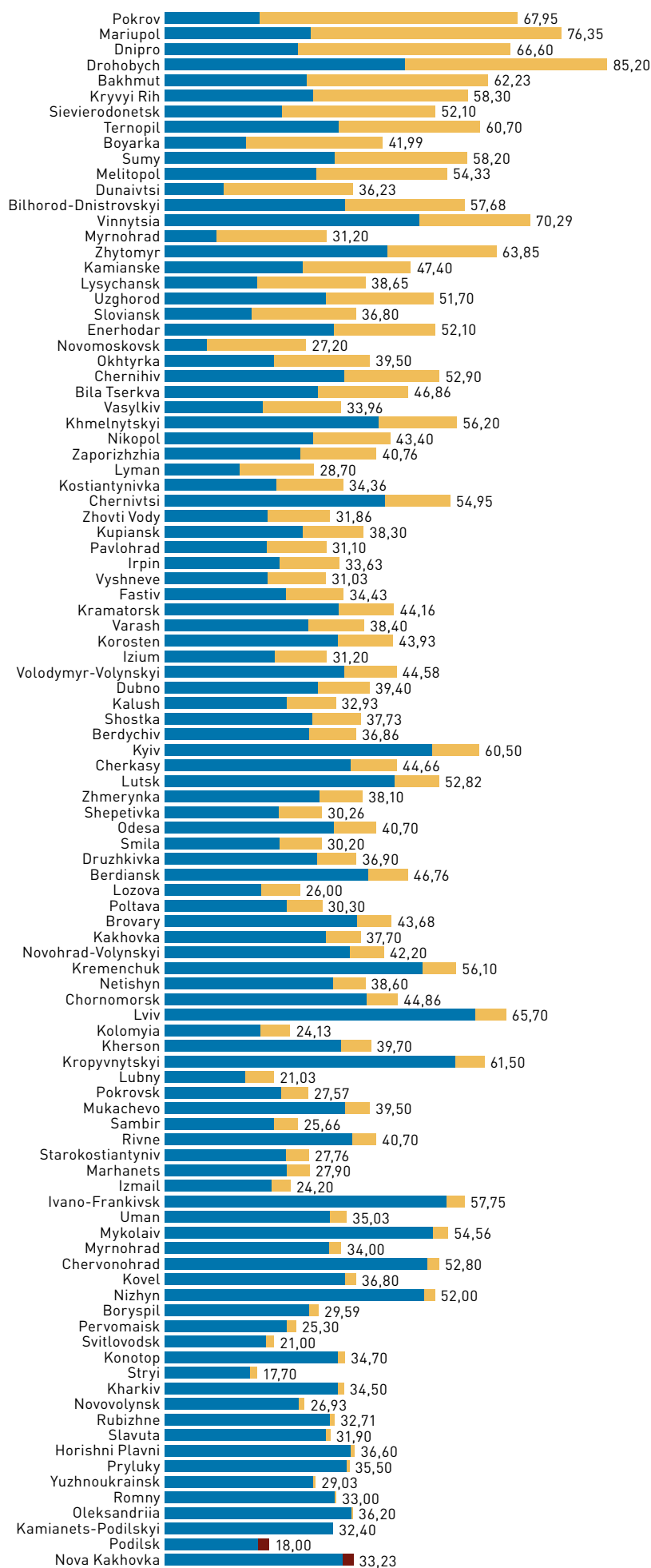


Figure 4. Score growth in 2018 compared to 2017, points.

Score in 2017
Growth in 2018

Although most cities which decreased in the ranking received a minor bump up in relation to the overall score (from 0.02 to 2.10 points) (Figure 4), this was not enough to maintain their place in the Ranking. Therefore, small changes are not sufficient for moving up the Ranking. Proactive actions of other city councils have led to an overall decrease in rank of particularly inactive city councils by as much as 30-40 positions. The examples of such poor-performing city councils include Oleksandriia, Horishni Plavni, Pryluky, Romny, Kamianets-Podilskyi, Kovel, Rubizhne, Slavuta, Yuzhnoukrainsk.

ANALYSIS OF THE TRANSPARENT CITIES 2018 RANKING

Leaders and Outsiders of the Ranking

In 2018, **Drohobych**, **Mariupol**, and **Vinnytsia** topped the rankings, whereas only a year ago, **Lviv**, **Kropyvnytskyi**, and **Ivano-Frankivsk** scored the highest points and led the 2017 Ranking.

What are the strong and weak sides of the most transparent cities?

Drohobych received the most points in 5 criterions out of 13. Those include the information about the work of the local government, land use and construction policy, human resources, social services, and financial and material assistance. In other spheres, the average percentage of completed recommendations is also high.

Cities seeking to improve the transparency of communal property management and human resources selection should look at **Mariupol**. In these spheres, the city council received the maximum number of points. Nevertheless, the procedure and subsequent results of providing financial and material assistance remain relatively closed, with only 38% of the recommendations having been implemented properly.

While government purchases and budget policy are perhaps the most closed area for the majority of city councils, **Vinnytsia** managed to implement more than 93% of the recommendations in each of these two areas. Just like for Drohobych, the most problematic spheres for Vinnytsia city council were professional ethics and the conflicts of interest as related to implementing recommendations.

Pokrov has been able to achieve the most impressive progress in improving transparency. During 2018, the city introduced changes in all spheres of activity of the city council, having received a total of 67.95 points and ranked 4th in the Ranking. Only a year ago, the city was 91st in the Ranking with 18.3 points. In particular, Pokrov substantially improved the transparency of communal property management, the work of utility companies, and citizens' participation in decision-making.

Mariupol also showed significant progress, having moved up from 57th place with 28.05 points to 2nd place with 76.35 points. Such a success was made possible by promoting the principles of transparency in budgetary relations, as well as land use and building policy and communal property management.

Dnipro took a lead in terms of gaining points. In 2018, the city additionally gained 41 points and moved up 61 rankings from 66th to 5th place.

Concerning the "anti-rating" of the cities, it also has changed compared to 2017. This time, **Stryi** (17.7), **Podilsk** (18), and **Svitlovodsk** (21) received the lowest number of points. The least transparent spheres of local government activities in these cities is almost identical. These are housing policy, financial and material assistance, utility companies and property, as well as the budget process.

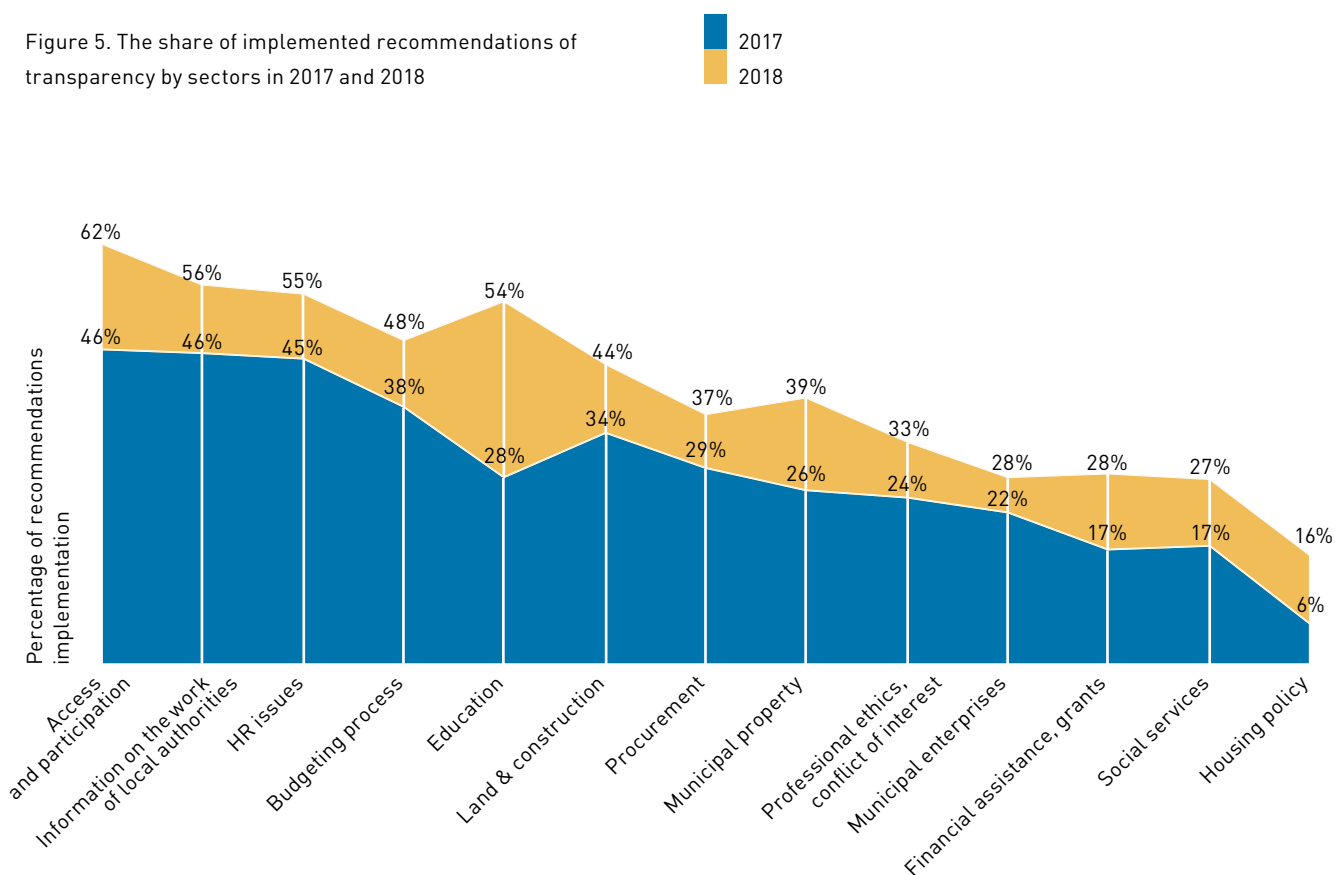
As shown by the 2018 Ranking, **Nova Kakhovka** and **Podilsk** received fewer points than in 2017. Nova Kakhovka city council became even more closed in the spheres of material and financial assistance, government purchases, and adherence to professional ethics. As a result, the city's indicators in the Ranking lowered by 3.07 points. Podilsk, at the same time, received lower marks in 2018 for citizen participation in decision-making and level of openness of information on the work of the local government body. As a result, Podilsk's result in 2018 is lower by 2.06 points.

The most transparent and closed spheres of activity of city councils

During 2018, the transparency of all areas of local self-government activity has improved. The graph below (Figure 5) shows the average performance indicators for each area in 2017 and 2018. The most transparent areas of activity of city councils were access and participation, information on work, and human resources policy of the local government body, while the most closed ones were housing policy, social services, and utilities.

During the past year, most transparency recommendations have been implemented in the spheres of education, communal property management, and access and participation. The progress in government purchases, professional ethics, and conflict of interest, as well as financial and material assistance and grants were significantly slower.

Figure 5. The share of implemented recommendations of transparency by sectors in 2017 and 2018



Next, we will analyze the main trends in the implementation of the principles of transparency in various spheres of city council activities: what positive trends could be observed in 2018, and which figures cause concern.

Information about the work of the local government body

The quality, quantity, and timeliness of released document; contact data; and local government's work schedule are assessed in this sphere. **Drohobych** received the maximum number of points, whereas **Lubny** received the fewest of all cities (only 1 point).

Positive trends	What causes concern?
<p>For the most part, city councils systematically inform citizens about their work through announcements, messages, etc.</p> <p>Local self-government agencies mostly publish draft decisions of the executive committee in advance.</p> <p>42% of city councils make publicly available two or more types of personal contact information which can be used to reach deputies of the city councils.</p>	<p>65% of city councils don't publish work plans of mayors and executive bodies. This raises questions as to how systematic and predictable the work of most local government bodies is.</p> <p>On the websites of 18% of city councils, there is no contact information of deputies of the city council.</p>

The relatively high level of information openness of local government bodies was expected. 6 out of 9 indicators of this sphere are built on the requirements of the current legislation. Additionally, 8 out of 9 indicators are not complex and they do not require significant systemic changes, such as the implementation of a city council decision or the development of a unique electronic tool.

Access and Participation

The indicators of the "Access and Participation" sphere are assessed by the availability of citizen participation tools (public budget, the ability to send an e-mail, etc.), the level of citizen activity on the city council website, as well as the accessibility of meetings of the city council and commissions.

The leader in the implementation of recommendations in this sphere is **Kropyvnytskyi** which received the highest possible score of 10. The lowest score went to the city of **Podilsk** at 2 out of 10.

Positive trends	What causes concern?
<p>The council actively engages the public in decision-making and interacts with the community through online communication channels, such as email. In 88 cities, there are ways to address the mayor, executive bodies, or individual deputies online.</p> <p>In accordance with the normative documents, the public can freely participate in meetings of local government bodies. In fact, residents of 91 cities can easily get to the meeting of the Standing Committee, as the documents of the city council do not impose any restrictions.</p>	<p>Analysts estimated several cases of limiting access to open meetings of local government bodies in 7 cities. Therefore, it is important to emphasize that formal openness does not mean that there are no restrictions in practice.</p>

Project decisions of city councils are mostly made public in advance. The Law of Ukraine “On Access to Public Information” stipulates that draft legal acts and decisions of local government bodies shall be promulgated no later than 20 working days before the date of their consideration for approval. Such a term is sufficient for the public to familiarize themselves with the projects and make proposals to the projects. In most cases it was followed by 69 city councils. The full agenda of the session was published a few more – 76 councils in total.

There were cases of ignoring the requirements of the law on promulgation of information. Less than half of city councils have approved and published on their websites a list of open **datasets that must be promulgated** by the city council, executive bodies, communal enterprises, institutions, and organizations. It is worth mentioning that local authorities, as information managers, are required to publish a list of data sets in accordance with clause 5-1 of part one of Article 15 of the Law of Ukraine “On Access to Public Information”.

The Dnipro City Council is one of the local government bodies that launched their own open source website²¹. Through regular surveys on the portal, the city council will determine which categories of data to be promulgated in the first place and in which categories of data visitors to the portal are interested. More than 500 sets of data have already been published on the portal.

HR policy, professional ethics, and conflicts of interest

The indicators of the personnel policy sphere measure the transparency of the selection process explanation: from the vacancy announcement to the minutes publication of the selection committee. In the field of professional ethics and conflicts of interest related to staffing issues, we evaluated the level of disclosure of information on party membership of deputies, the availability of tools for informing citizens about unethical behavior or conflict of interest, and the availability of regulatory documents on this topic.

10 city councils have implemented all the recommendations on transparency of personnel issues. These are **Boyarka, Dnipro, Drohobych, Enerhodar, Zhytomyr, Korosten, Lysychansk, Mariupol, Melitopol** and **Pokrov**. Instead, local councils for five cities (**Lubny, Myrnohrad, Pervomaisk, Svitlovodsk, Yuzhnoukrainsk**) did not promulgate the necessary information on recruitment.

In the area of professional ethics and conflict of interest only **Kamianka** City Council of Dnipropetrovsk region managed to get the maximum amount of points. At the same time, the cities of **Vyshneve, Lyman, Poltava, Romny**, and **Svitlovodsk** did not comply with any recommendations.

Positive trends	What causes concern?
The city councils properly publish on their websites an announcement of a competition for positions in executive bodies. 70 cities complied with the requirements regarding the content of the competition notices. Such announcements do not contain any discriminatory restrictions. In the text, you can see the date the announcement was posted and understand whether the statutory deadline for submitting documents for participation in the competition and the publication of results are compliant.	Only 13 councils publish the final assessments, minutes, and ratings of candidates for vacancies after decisions are made . Failure to disclose this information undermines the credibility of competitive procedures and creates additional grounds for challenging the results of the competition.

The websites contains open information about the professional experience of the **mayor**. 86 city councils publish a detailed biography of the city mayor, and 71 indicate whether the mayor had connections to commercial or non-profit organizations before taking their post. At the same time, legislation does not require the promulgation of this information.

Local finances: budget process, financial assistance and grants

In the field of local finance, we estimated the transparency of information about the budget of the city, reports on its implementation, as well as information on providing financing at the expense of budgetary funds.

The leader of budget transparency is the **Nizhyn** City Council, which received the maximum amount of points possible, while **Izmail**, **Pervomaisk** and **Slavutsk** city councils did not receive a single point.

In the area of providing financial assistance, the **Drohobych** city council is a model of good practices. At the same time, 18 cities did not demonstrate openness of information on the allocation of budget financing and received 0 points.

Positive trends	What causes concern?
<p>Most city councils comply with the requirements of the legislation on budget transparency: publish a decision on the city budget, report on its implementation, and promptly announce project decisions on amending budgets.</p> <p>More than a half of the city councils (54%) hold open competitions on fund allocation between civil society institutions, despite the fact that this is not a requirement of the law.</p>	<p>Only 41 city councils promulgated data on the object allocation expenditures. This limits the ability of citizens to control the correct spending of budget funds.</p> <p>Closed fund allocation for the implementation of projects and proposals of civil society institutions creates a risk of public distrust of local government decisions, and especially when small civic organizations are a common phenomenon faced by virtuous activists at the local level²².</p> <p>Less than a third of city councils have adopted budget regulations. Adoption of such a document would help the council to fine-tune the specifics of procedures related to public participation in the budget process, budget sharing, budget execution, etc.</p>

In a number of cities, there are separate websites devoted to budget information. For example, in Chernivtsi the portal “Open Budget of Chernivtsi City” was launched. The resource visualizes a detailed distribution of the city budget expenditures - from financing of preschool educational institutions to the acquisition of postage stamps²².

²² OSCE Project Coordinator in Ukraine. Perception of the anti-corruption reform success in Ukraine: regional dimension. – Kyiv, 2018: <https://www.osce.org/uk/project-coordinator-in-ukraine/375277?download=true>

²³ The portal “Open Budget of Chernivtsi City”: <https://cv.ofd.in.ua>

Education and social services

In the areas of education and social services, the availability of online services (application to school, kindergarten, social services center, etc.) is initially assessed, as well as the availability of information.

In 2018, the leaders of transparency in the education sphere were **Kremenchuk** and **Melitopol**, while **Rubizhne** and **Sambir** did not score a single point. In social services, the two leaders are **Drohobych** and **Sievierodonetsk**. At the same time, 25 cities did not comply with a single recommendation.

Positive trends	What causes concern?
82 city councils use an open method of distribution of places in pre-schools.	<p>33 city councils did not promulgate rules for children's admission to pre-schools.</p> <p>Less than half (47%) of city councils publish lists on their websites, contacts for social assistance institutions, and lists of services they provide. However, the Law of Ukraine "On Access to Public Information" obliges local government bodies to publish the list and official numbers of communal enterprises, institutions, and organizations subordinated to them. In addition, no city has an opportunity to submit an online application for services in such institutions.</p>

Property Management: Procurement, Municipal Enterprises, and Communal Property

In the field of procurement, we estimated the level of promulgation and detailing of information on purchases of local authorities, regulation of tentative purchases, and the use of ProZorro. For a high level of transparency of purchases, the **Mariupol** city council received the highest score among all cities at 6.75. At the same time, 13 local self-government bodies did not comply with any recommendations in this sphere.

Transparency of municipal enterprises is evidence of the existence of supervisory boards, proper financial reporting, and auditing of municipal enterprises. There is also no individual leader in this area. The highest score was 7 out of 10, which was received by **Drohobych** and **Mariupol**. On the other hand, **Lyman**, **Lysychansk**, **Svitlovodsk** and **Stryi** did not get any points.

In the area of communal property, we assessed the availability of information on communal property and the transparency of the process of its lease or sale. The only city to receive the highest possible score was **Mariupol**. Nine city councils did not receive a single point.

Positive trends	What causes concern?
More than half of city councils have published a list of all communal property. In addition, the number of councils that publish these data in not a machine-readable format has halved.	On average, city councils implemented only 1 of 4 recommendations on the transparency of communal enterprises . This indicator can be labeled threatening, as it shows that the requirements of the law are ignored by local government bodies: 8 out of 10 indicators of the sphere "Communal Enterprises" are built on legislative provisions and are mandatory.

On the websites of 42 city councils, financial reports of most communal enterprises have been promulgated.

In 51 cities, competitions are held on the fund's disposal between civil society institutions. In most councils, the decision to grant financing to individuals and legal entities is open.

For example, Article 78 of the Commercial Code of Ukraine requires promulgation of remuneration information and annual reports of the head and members of the supervisory board of communal enterprises. However, only 4 city councils (of Vasylkiv, Izium, Kropyvnytskyi and Nizhyn) have promulgated some of these data on their websites.

Only 23 cities registered all communal enterprises on the website **spending.gov.ua**. However, according to the Law of Ukraine "On the Openness of the Public Funds Usage", information about the disposal of funds from local budgets is subject to mandatory promulgation by administrators and recipients of budget funds on a single website of using public funds. This means that control over the use of taxpayers' funds, checking information on what and for what purpose it was procured by local authorities, and whether prices are not inflated are complicated in many cities.

Almost half of the city councils did not promulgate the decision **to grant financing** at the expense of the city budget and did not even publish the list of applicants who were denied funding.

Despite the availability of **DOZORRO** and other similar resources, 43 cities did not use any e-service to read complaints of purchasers and actions taken.

In Kalush, Ivano-Frankivsk region, local activists initiated the creation of an interactive map of communal property²⁴ based on Power BI and the publication of a list of all communal property objects. On the website you can check information about the address, purpose, balance holder, user, the value of the communal property, and other data. Recently, Kaluga activists helped to realize this experience at the Ivano-Frankivsk city council²⁵.

Housing policy

In the housing sphere, we assessed the availability of online housing services and the openness of the housing commission. The highest score was received by **Drohobych** - 6 out of 7 points. However, 47 city councils did not comply with any recommendations.

²⁴ Official website of Kalush city council of Ivano-Frankivsk region. Map of communal property:

<http://kalushcity.if.ua/communal-property>

²⁵ Official website of Ivano-Frankivsk city council. Map of communal property: <http://www.mvk.if.ua/kmmmap>

Positive trends	What causes concern?
In comparison with 2017, three times more (27 in total) city councils have promulgated the procedure for providing housing for citizens requiring housing conditions improvement.	<p>More than 80% of cities do not publish information on housing premises owned by the public and did not open an access to the process of implementing ongoing and capital repairs of residential buildings.</p> <p>63% of city councils have not published information on methods and criteria for housing distribution.</p>

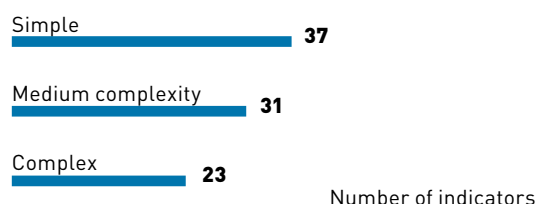
The lowest percentage of recommendation implementation (16%) was in the housing policy sphere. First of all, most city councils do not comply with the requirements of the law on the disclosure of open data. Why has the housing sector been so closed for two years in a row? Often, experts of local government refer to the fact that in the information regarding residential premises or in the cases of citizens needing improvements to their living conditions, there were no changes for many years. Therefore, publishing of this information does not make any sense. It should be noted that the publication of the list of articles of municipal property and title lists for capital and current repairs is stipulated in the Regulation "On Data Sets to be Made Public in the Form of Open Data," approved by the Cabinet of Ministers of Ukraine from October 21, 2015, No. 835. Inventory of housing premises and other articles of municipal property will provide better insight into what real estate is owned by the territorial community and how to manage it more efficiently.

An example of proper accounting of municipal property, including housing premises, is the Register of Land and Communal Property in Pokrovsk²⁶, developed by the Pokrovsk City Council of Donetsk Region. On a specialized website, you can search for real estate owned by the municipality and get acquainted with the procedure and announcements on holding a tender for the right to lease property.

What are the most difficult recommendations to implement?

Across the whole spectrum for improving transparency are recommendations those that require different amounts of financial resources, time, creativity and skills. Realizing this, we divided the indicators into three groups: simple, complex, and medium complexity (Appendix).

Figure 6. Distribution of indicators by complexity



This gradation also affects the "popularity" of the indicators. Thus, the most common manifestation of transparency among city councils is providing an opportunity to send an **electronic appeal**. In connection with the changes added in 2015 to the Law of Ukraine "On Citizens' Appeal," local self-government bodies are obliged to consider applications, proposals and complaints from the Internet. Despite the fact that the availability of a channel for online communication is not a legal requirement, 88 city councils offer such a service.

²⁶ Pokrovsk Registry of Land and Municipal Property: <http://reestr.pokrovsk-rada.gov.ua/uk>

An example of an open interaction of the city council with the public is the electronic appeal on the site of the Kalush City Council of Ivano-Frankivsk region²⁷. When submitting an application, the applicant may choose a specific addressee such as the mayor, another representative of the executive body, or a deputy of the city council. It is up to an applicant for the texts of appeals and responses be made public on the council's website or leave it hidden from general review.

Undoubtedly, the implementation of this recommendation saves city resources on other activities. However, the implementation of this plan does not require excessive effort. This is a simple indicator. Similarly, about 80% of city councils publish announcements, biographies of city mayors, decisions on city budgets, and reports on their implementation on their websites. All these indicators do not require significant systemic changes and/or costs or relate to the disclosure of existing information.

A user-friendly calendar of events with the ability to search by date, period, and keywords is on the website of the Mykolaiv City Council²⁸. The Zaporizhzhia City Council²⁹ offers an alternative solution to simplify the search for news. All news is divided into groups: "Recent," "Main," "City," "Authorities," "Society," "Education," "Sports," "Health."

On the other hand, 80 city councils have implemented **public budgets** (participation budgets), and 82 use an **open method of place distribution in pre-school**. We characterize these indicators as "complex," as they require significant systemic changes and public involvement.

Cherkasy was one of the first Ukrainian cities to introduce a participatory budget. Today, there are many ready-made solutions that simplify the implementation of public budgets. For example, this is a platform for participation in the "Public Project."³⁰ This platform uses 35 cities from the Ranking³¹. Another 32 cities are registered in the "Public Budget"³² system.

It is logical that complex indicators prevail as the most difficult to implement. Thus, cases of implementation of recommendations for **the electronic services usage** are the least common. These include registration to institutions of general secondary and pre-school education, registration of persons who need improvement of housing conditions, receiving services in social assistance institutions, and obtaining permission for the establishment of temporary buildings, terraces, etc. Less than 10% of city councils use these tools. What does this mean? On the one hand, there is a possible lack of interest in implementing best practices in using e-democracy tools because of low demand, lack of human or financial resources and skills³³. On the other hand, obsolete legislation also does not promote the implementation of e-democracy tools. A typical problem with the introduction of online services is that legislation often requires the submission of documents in person or in paper form³⁴. Therefore, city councils have to show a great flexibility and creativity in the development of digital instruments.

Figure 7 shows the percentage of recommendations made by each city council based on the different levels of difficulty for their implementation.

²⁷ Official website of Kalush city council of Ivano-Frankivsk oblast: http://kalushcity.if.ua/appeal/appeal_rada/384

²⁸ Official website of Mykolaiv city council: <https://mkrada.gov.ua/calendar/>

²⁹ Official website of Zaporizhzhia city council: <https://zp.gov.ua/uk/articles/category/news/>

³⁰ Institute for Budgeting and Social and Economic Research. Civic project: <https://www.ibser.org.ua/gromadskyy-proekt>

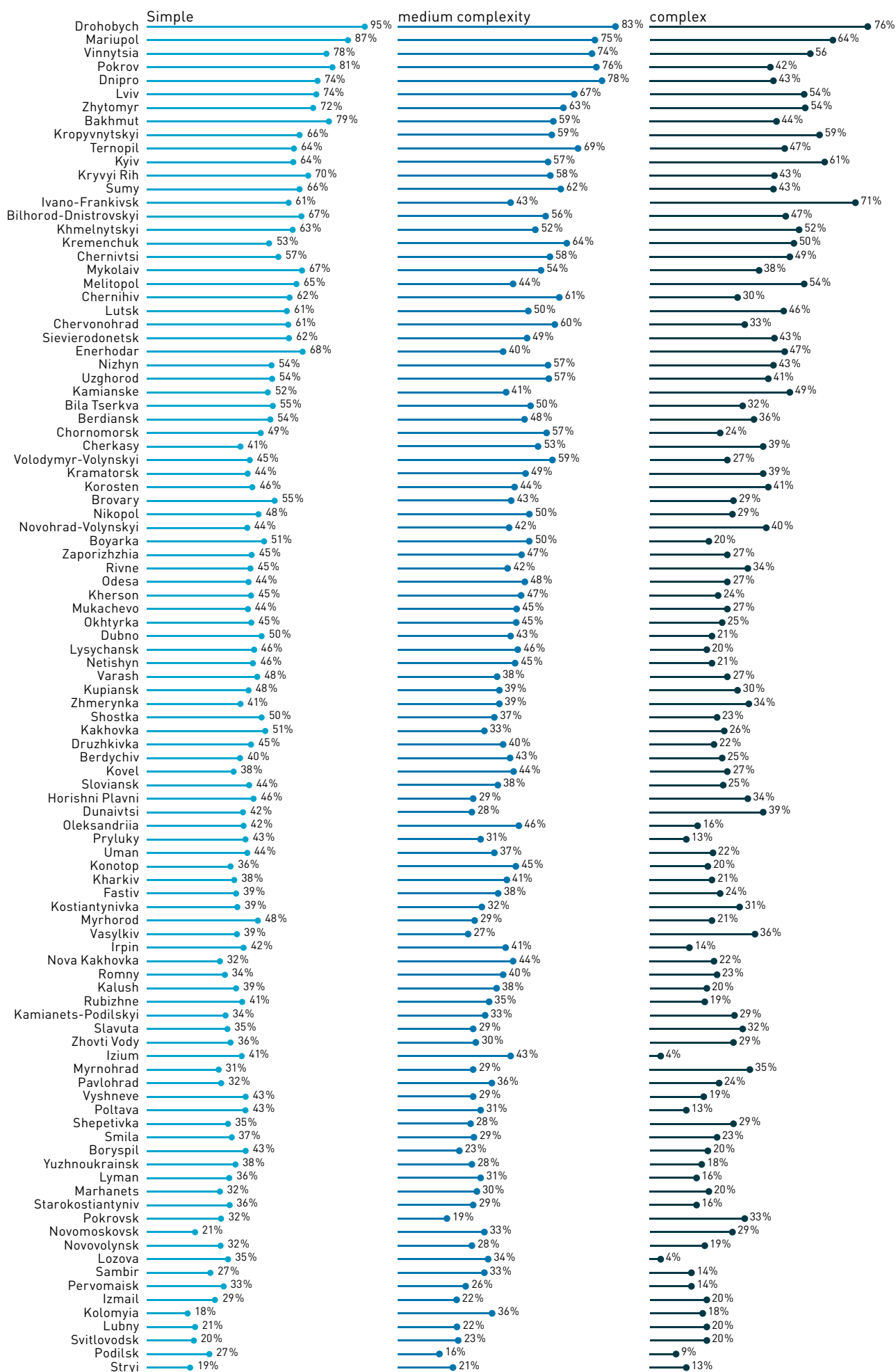
³¹ According to the Service of Social Voting analysis: <https://www.voting.in.ua/platforms/citizens-project-socialboost-ibser>

³² "Civic budget" system: <http://budget.e-dem.in.ua/#/>

³³ EGAP Program. Analytical notes on effective e-governance. Issue No. 3: E-Democracy on the Local Level: State of Development: <http://bit.ly/2WT08qs>

³⁴ EGAP Program. Analytical notes on effective e-governance. Issue No. 4: Building the New Architecture of E-Services in Ukraine: <http://bit.ly/2XCpmH3>

Figure 7. Implementation of recommendations of different complexity levels in 2018



Implementation of recommendations divided by degree of obligation

In order to find out how proactive city councils are in promoting transparency, we decided to divided indicators into two groups: those that are legislative requirements and those that can be characterized as practice in good faith. By default, the indicator is classified as a practice in good faith unless the law demands proper requirements to be met.

Most of the methodology indicators (56%) are legislative requirements (Table 3). A more detailed breakdown of indicators by degree of compulsion is stated in the Annex. The maximum number of points that the city could have received for fulfilling legislative requirements was 56. However, in 2018, the highest number of points that a city received was 49 points (Drohobych), meaning that, in our opinion, the city council of Drohobych fulfilled 87% of the recommendations that are required by law.

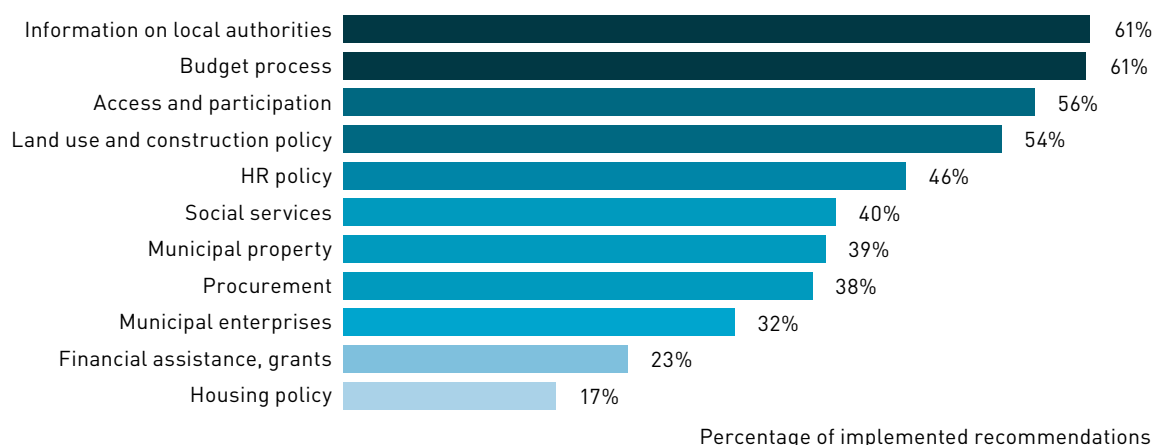
Table 3. The number of indicators that are legal requirements and best practices in each area

Area	Indicators — legislative requirements	Indicators — best practices
Information on the work of local authorities	6	3
Access and participation	4	4
Procurement	3	4
Housing policy	3	3
Budget process	4	3
Financial assistance and grants	4	4
Social services	2	2
Human resources	2	3
Professional ethics and conflict of interest	0	6
Land use and construction policy	8	1
Municipal enterprises	8	2
Municipal property	7	
Education	0	5
Total	51	40

The average percentage of legislative requirements fulfilled is 44% (24.6 points out of 56). Therefore, it's difficult to recognize city councils as proactive in fulfilling even the legislative require-

ments. More often than not, the information is of interest to the public is not published on the websites of the city councils.

Figure 8. Compliance with Legislative Requirements by Sectors



City councils were the most diligent in fulfilling legislative requirements in the areas regarding the openness of their work, budget process, as well as the participation of citizens in decision-making (the figures range from 56% to 61% of fulfilled requirements of the law). Such a result may, first of all, be due to the fact that these areas are treated as sufficiently “visible” activities of the city councils. City residents are primarily interested in who represents their interests and how the work of the councils is organized. Second of all, these areas only have a few complex indicators. For instance, published budget decisions, reports on budget implementation, and council estimates are already available to local governments, and all that is required to implement the recommendation is to make this information available on their website.

The lowest percentage of fulfilled requirements (from 17% to 32%) are in the areas of housing policy, financial, material assistance and grants, as well as public utilities (Figure 8). Such an indicator does not necessarily show the nature of corruption in these areas. Although the research conducted by the OSCE Project Coordinator in Ukraine does show that widespread local corruption issues are related primarily to the distribution of funds and the management of communal property³⁵.

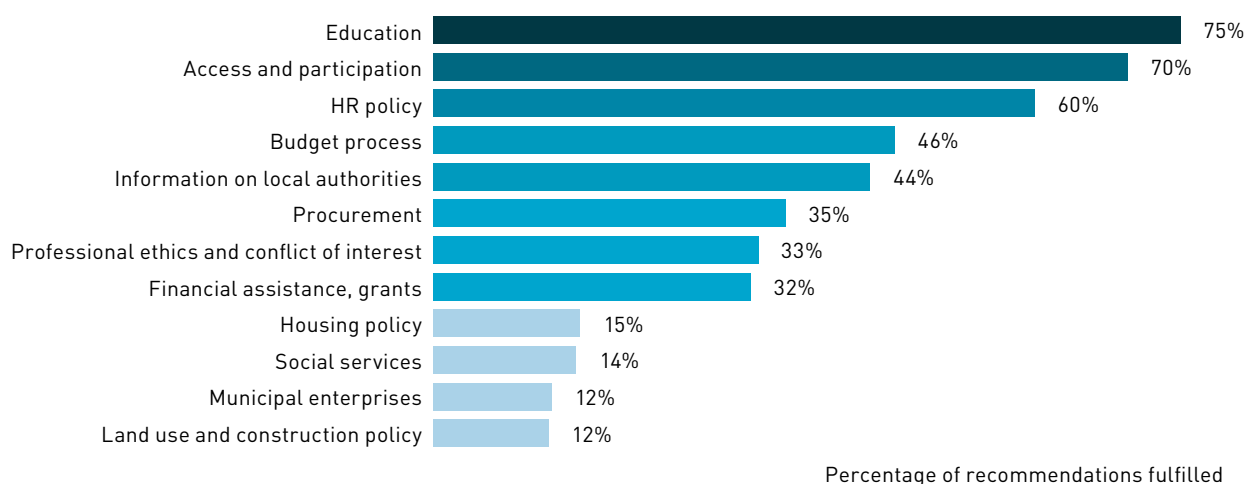
At the local level, ordinary residents may rarely turn to self-government bodies to deal with housing issues. Among the reasons for this include the reduction of vacant living quarters, the lack of understanding of housing distribution mechanisms, and the general “stagnation” of the communal housing stock³⁶. By the same token, only financial institutions, civil society organizations, or individual citizens who seek funding are the ones interested in financial and material assistance and grants. The same applies to the problem of transparency of communal enterprises, which is also difficult to communicate or implement through a large number of utility companies. This specificity of citizen contacts with local government bodies in these areas may explain why local authorities mostly ignore the fulfillment of the law.

For recommendations related to practices in good faith, compliance is even lower, reaching an average of 38% (16.77 points out of 44) (Figure 9). The fulfillment of such recommendations, such as regular publishing of local governments plans and agenda, using special resources (DOZORRO, etc.) for monitoring government purchases, and online services for providing municipal services would have helped lower corruption risks, increase the trust of citizens, and enrich the local budgets.

³⁵ OSCE Project Coordinator in Ukraine. Perception of the anti-corruption reform success in Ukraine: regional dimension. – Kyiv, 2018: <https://www.osce.org/uk/project-coordinator-in-ukraine/375277?download=true>

³⁶ TI Ukraine. How to Make Local Authorities More Transparent? Analytical report by #TransparentCities. — Kyiv, 2017: https://ti-ukraine.org/wp-content/uploads/2017/12/anatychnyy-zvit_prozorist.pdf

Figure 9. Implementation of good practices by sector



What will 2019 City Transparency Ranking look like?

We expect 2019 to be a turning point for most city councils. We hope that the next **local elections** will be an incentive for cities to demonstrate their openness to the public.

Another reason to expect changes would be the fact that Ukrainian cities signed and joined the International Open Data Charter, an international initiative that encourages the implementation of principles and best practices for the disclosure of open data. Earlier, the Charter was signed by Vinnytsia, Dnipro, Drohobych, Lviv, and Chernivtsi. At the end of 2018 into early 2019, Kropyvnytskyi, Ternopil, Khmelnytskyi, and Ivano-Frankivsk joined³⁷. The main principle that the Charter advocates for is openness of data by default: all public information is open, except in cases defined by law. Administrators must proactively make new data sets open³⁸. Knowing this, we should expect the above-mentioned cities to serve as an example for other local government bodies.

However, the political will of the cities to implement changes is not limited only. A number of local government bodies even approved **official decisions to improve the city's results in the Ranking**. For instance, in March 2019, the Mukachevo Mayor issued an order "On Improving the Position of the City of Mukachevo in the Ranking of Transparency of Ukrainian Cities," which instructed the publication of necessary information on the city's website and the creation of new opportunities for online services for the cities. Similar decisions are also made in Boyarka, Kramatorsk, Oleksandriia, and other cities. It remains to be seen how these decisions will affect the rankings of these cities.

³⁷ Open Data Charter: <https://opendatacharter.net/adopted-by-countries-and-cities/>

³⁸ Action plan to join the International Open Data Charter: <https://data.gov.ua/pages/plan-dii-z-pryiednannia-odc>

HOW SOME CITIES BECOME MORE TRANSPARENT WHILE OTHERS DO NOT: Debunking Myths

Decreases in figures for individual markers and the inaction of some local government authorities show that transparency still has not become an established public sector practice. Even city councils who partially made data public in 2017 are inclined to backslide. As a result, their positions in the Ranking fell. Why did that happen? Which factors influence the application of transparency measures in the biggest Ukrainian cities?

We have analyzed a range of factors that may explain rises and falls in Ranking positions. They include the population, city budget revenues, proactive policies, counselling with TI Ukraine, the mayor's gender, local political activity, level of local media access, population percentage that is 65 years old and over, administrative status of residential areas, and geographical region where a city is located. We ascertained that only some of these factors influence levels of transparency. Let's consider them in detail below.

Myth 1. Large cities have more opportunities for implementing transparency improvement recommendations.

It's said that administrative processes in large residential areas are more standardized, under greater public control, and that the communities have sufficient labor potential and financial capacity to make improvements. Thus, those cities have more opportunities and potential to rank higher. We examined whether that is true. In our Ranking, cities are divided into five groups according to population³⁹:

- Small - up to 49,999 residents;
- Average - from 50,000 up to 249,999 residents;
- Large - from 250,000 up to 499,999 residents;
- Extremely large - from 500,000 up to 999,999 residents;
- The largest - over 1 million residents.

Figure 10. The number of cities in the Ranking by population



As it turned out the size of the city based on population does not affect a city's potential to receive higher scores. Small and large cities have equal chances to be on top of the Transparency Ranking.

Conclusion: The myth has been refuted. City population does not have a direct influence on the implementation of transparency principles.

³⁹ Classification of cities is from State Construction Standards 360-92 approved by the order of the State Commission of City Construction of 17 April 1992 No. 44 (with amendments) and the Law of Ukraine "On Approval of the National Program of Small City Development"

Myth 2. Wealthy communities have more spare funds for implementing innovations, therefore better chances to receive a top score in the Ranking.

To analyze the impact of the city budget on the transparency of local authorities, we compiled data on the city's annual budget fulfillment according to revenues⁴⁰. Statistical analysis made it possible to ascertain that where the city budget is bigger, transparency score markers are higher. However, this influence is minor. With the increase of revenues by 1 %, the city's ranking increases by 5.62 on average. How can we explain this? Obviously, the availability of additional financial resources could help city councils to make somewhat better resolutions, such as unique design or new online services.

Conclusion: The myth is exaggerated. This statement slightly overestimates the impact of budget revenues on transparency scores.

Myth 3. Ambition and action plans of city authorities are of secondary importance.

We determined that this is not actually correct. Those cities which cooperated with TI Ukraine while implementing recommendations progressed more than those that did not. Over 30 city councils sought counselling and explanations for TI Ukraine's analytics during 2018. It has had a great impact on those cities' improvement in transparency indicators. On average, city councils which cooperate with TI Ukraine can improve their transparency score up to 18.38 points. On one hand, it seems cities that seek explanations receive far better understanding of methodology and of their future steps. However, this fact confirms another very important difference. Cooperation with the public sector demonstrates the leadership abilities of the mayors and their willingness to implement change.

Conclusion: the myth is refuted. Proactive efforts of city authorities and political will of city leaders are key factors that influence the transparency of a city.

Myth 4. Cities governed by women are more transparent

International studies confirm that women in public administration sector tend to be more open, collaborative, and have practical views on politics⁴¹. How might this observation influence public transparency? Researchers had already tried to analyze gender dimension of transparency on a local level and discovered that cities where women hold a leadership position in a city council show higher level of transparency⁴². TI Ireland confirms this conclusion as well. City councils with a higher percentage of women as leaders received higher marks according to Ireland's National Integrity Index⁴³.

According to official data, about one third of the heads of village councils in Ukraine who were elected in 2015-2017 are women. However, on the city level, representation of women is much lower - only 6% of the heads of cities of oblast significance and 10% of heads of cities of district importance are women.⁴⁴

Among the heads of the 100 largest Ukrainian cities that were the subject of these studies, only 5 are women⁴⁵. They are leaders of Bilhorod-Dnistrovskyi, Dunaevtsi, Marhanets, Pervomaisk, and Pryluky. Our research revealed the gender of a mayor in Ukraine does not influence the markers of city council transparency, but the lack of data on this matter does not allow statistical extrapolation.

Conclusion: The myth is neither refuted nor confirmed. There is not enough data to make a clear and precise conclusion.

⁴⁰ Data from official websites of city councils. Revenue of the city budget includes the total amount of income to the municipal budget according to the annual report on budget execution, including tax and non-tax income, revenue from operations with the capital and transfers.

⁴¹ Childs, S. 2004. A Feminised Style of Politics? Women MPs in the House of Commons. *The British Journal of Politics and International Relations*, 6(1), pp.3-19.

⁴² Tejedo-Romero, F. and de Araujo, J. 2018. Determinants of Local Governments' Transparency in Times of Crisis: Evidence From Municipality-Level Panel Data. *Administration & Society* 2018, Vol. 50(4), pp. 527-554

⁴³ Transparency International Ireland. 2018. National Integrity Index 2018: Local Authorities: https://transparency.ie/sites/default/files/18.05.14_nii_report_vf.3_web.pdf

⁴⁴ UNDP in Ukraine. 2018. Corruption as Seen by Women and Men: https://www.undp.org/content/dam/ukraine/docs/DG/ETI/Gender_corruption_report%20UA.pdf

⁴⁵ Data from the Central Electoral Commission website: <http://www.cvk.gov.ua/pls/vm2015/PVM004?pt001f01=100>

Myth 5. There is a lower demand in cities with a large elderly population to get information through websites, and thus local authorities have less motivation to publish information and provide online services.

In the 100 largest cities of Ukraine, the population of people 65 years and older ranges from 6% to 37%. The highest percentage of elderly people were located in small cities in eastern Ukraine (cities with a population of up to 50,000 residents). The lowest percentage is in regional centers and small cities in western Ukraine where the average wage level is relatively high.

According to the Internet Association of Ukraine⁴⁶, residents aged 65 and over are the least active internet audience in the country. Only 6% of this age group use the internet on a regular basis. It suggests that in the cities where many older people live, the demand for digital services and online information is lower. As a result, such inactivity may decrease the motivation of local authorities to introduce new technologies and fill city council websites with useful information. And vice versa, in cities where young people live, city councils tend to introduce online services more often.

We found out that the number of older people does not influence the transparency of public authorities. Those so called “youth” cities have the same opportunities in the ranking as the cities with older populations.

Conclusion: The myth is refuted. A higher percentage of an elderly population and thus lower interest of some city residents to use internet sources and services is not an obstacle for local authorities that prefer to become transparent.

Myth 6. Cities that are regional centers are more transparent than those that do not have this status.

In cities that are administrative centers, authorities are more focused on the events and political activity of its residents.

There are 22 cities in our Ranking that are administrative centers of oblasts. Six of these are in the top 10 according the final calculation of points. However, two cities, Kharkiv and Poltava, were in the second half of the Ranking (Table 4). Using statistical

analysis, we ascertained that the status of regional center does not affect the level of transparency.

Таблиця 4. Бали та рейтинг прозорості міст – обласних центрів

City	Mark	Number in Ranking
Vinnytsia	70.29	3
Dnipro	66.6	5
Lviv	65.7	6
Zhytomyr	63.85	7
Kropyvnytskyi	61.5	9
Ternopil	60.7	10
Kyiv	60.5	11
Sumy	58.2	13
Ivano-Frankivsk	57.75	14
Khmelnyskyi	56.2	16
Chernivtsi	54.95	18
Mykolaiiv	54.56	19
Chernihiv	52.9	21
Luts'k	52.82	22
Uzghorod	51.7	27
Cherkasy	44.66	32
Zaporizhzhia	40.76	40
Odesa	40.7	42
Rivne	40.7	41
Kherson	39.7	43
Kharkiv	34.5	64
Poltava	30.3	81

Conclusion: The myth is refuted. We ascertained that whether a city is an oblast or district center or neither, all cities may be equally transparent.

Therefore, we found out that out of all of the factors analyzed, only two have a significant influence on transparency indices of a city; city incomes and, most importantly, political willingness and proactive efforts of government authorities.

⁴⁶ Factum Group Ukraine. Internet Coverage in Ukraine:

https://inau.ua/sites/default/files/file/1903/dani_ustanovchyh_doslidzhen_za_1-y_kvartal_2019_0.pdf

INSTEAD OF A CONCLUSION: “Victories and Losses” of Municipal Transparency

“Losses”

Following the results of two years of measuring the transparency of city councils, we can conclude a positive dynamic. However, there are challenges that require the special attention both of those in power who make decisions and public activists.

1. **The average level of transparency of city councils remains rather low.** The initial level of transparency in countries that applied the same methodology (Canada, Spain, Slovakia) exceeded 40%. In Ukraine it totaled less than 30%. Only now has this rate reached 40%. Most cities, however, are still in the “mostly non-transparent” group.
2. **City councils tend to ignore the requirements of the law related to the disclosure of information.** The average rate of implementation of our recommendations, which are largely based on requirements by law, totaled 44%. This is concerning. If all city councils met these requirements, the lowest expected rate would be 56 points. Instead, in 2017, this figure was 6 points and in 2018 it was 17 points.
3. **There is often a lack of leadership and strategies to implement changes on the local level.** On average, only 38% of recommendations were implemented by city councils, despite being best practices. First of all, it indicates a lack of willingness to change as we ascertained that city size or administrative center status does not affect the transparency of a city.

4. **Cities have a formal approach to transparency implementation.** Generally, transparency for local officials is in sync with “reporting” and “publishing information on the website.” A small number of local authorities analyze community requests for certain services or data and develop accessible websites. Therefore, person-centered approach is difficult to define as a priority for city councils so far.
5. **City councils do not always use existing opportunities.** For instance, in November 2018 on the initiative of the Ministry of Finance of Ukraine, information about all local budgets was published on the Open Budget⁴⁷ portal. The portal provides an opportunity to track how the budget is formed and where funds are directed. This is a ready-made visualization, a link to which can be placed on the council’s website and thus provide citizens with an opportunity to monitor the use of budget funds. However, only 41 city councils disclosed data on the object distribution of expenses in 2018.

“Victories”

1. **Competition between cities is increasing.** That means the Ranking works as a way to encourage cities to constructive competition. Cities compete among themselves not only at the level of regional centers, but also small cit-

ies and neighboring communities compete. All cities improved their transparency rate by an average of 12 points, except for Nova Kakhovka and Podilsk, which showed no positive changes. In 2018, 41 city council received good news: their position in the Ranking rose.

⁴⁷ Portal «Open Budget»: <https://openbudget.gov.ua/local-budget?id=26400100000>

2. **The proactive efforts of city councils assist in making changes more quickly and efficiently.** City councils that sought explanations from TI Ukraine when they had any questions progressed far more in the implementation of their recommendations. The most important is that such cooperation is evidence of strong leadership and a desire in these leaders to improve these cities themselves.
3. **The number of cities of the “non-transparent” group is decreasing.** In 2017, 17 cities, almost every fifth city, belonged to this category. In 2018, there are only two remaining.
4. **Cities actively implement digital services.** The Transparency Ranking Methodology includes 7 indicators for the introduction of digital services. Their implementation allows cities to host more services online for the public, such as sending an inquiry, registering citizens who need housing assistance, applying for educational institutions, applying for social assistance and monitoring their status, as well as controlling the legitimacy of auctions. This allows for people to avoid contact with bureaucracy, and makes decision making more transparent and comprehensible. More than 80 cities have introduced digital inquiries, online registration, and portals for tracking applications to kindergartens and schools.
5. **The practice of involving the community in decision making is spreading.** There is an understanding that community engagement in the decision-making process, the implementation of policies with participatory budgets, the assurance of unimpeded community participation in collegial bodies, the work of supervisory boards of public utilities, and in budget hearings gives a chance to build trust and make better decisions.

Key recommendations

1. Study and implement best practices for the introduction of transparency. The Transparency Ranking can be a useful source to understand these practices and for inspiration for proper decisions.
2. Use ready-made tools if it is not possible to develop a unique solution. There are so many of tools available, from participatory budgets to monitoring of procurement processes.
3. Regulate procedures. It is a well-known formula: corruption = monopoly + discretion – accountability⁴⁸. Therefore, it is good practice to adopt budgetary regulations, to make the rules for admission to preschool institutions publicly available, as well as methods and criteria for the distribution of housing and other decisions that will reduce the amount of discretion held by public officials to a reasonable minimum.
4. Modify websites and online services according to the needs of end users -- community members. To do this, it is necessary to analyze regularly the issues that are violated in the queries and conduct surveys of city website visitors or portal of open data.
5. Stress the transparency of the budgetary process and finances. Information about the distribution of expenses, reporting of public utilities, purchases, free land plots, etc. should be made public on the city council website, even if the law does not require it. It is specifically these data which attract the attention of an investor, who is choosing in whose city economy to invest, and of a lender, who is deciding whether to provide a city with loan.
6. Collaborate with the public sector where clarification or examples of implementation of certain initiative are needed. Inclusiveness leads to more qualitative decisions.

⁴⁸ Klitgaard, R. et al. 2000. *Corrupt Cities: A Practical Guide to Cure and Prevention*. California: Institute for Contemporary Studies: <http://documents.worldbank.org/curated/en/709171468743399124/Corrupt-cities-a-practical-guide-to-cure-and-prevention>

ANNEX

Classification of the indicators on City Transparency Ranking Methodology by how complex they are and whether they constitute a legal obligation

Indicator code	Indicator description	Complexity	Obligation
Information about the work of municipal authorities			
A16001	Are the minutes of presidium (panel, conciliation board or a similar advisory agency) meetings published on the official website?	simple	good practice
A16002	Is information about the daily/weekly work plan of the mayor and executive bodies of the council (executive committee, executive bodies etc.) published in detail on the official website?	simple	good practice
A16003	Are advertisements, announcements, and messages from the City Council, the executive committee, municipal enterprises, institutions and organizations posted on the website?	simple	required by the law
A16004	Is it possible to find advertisements, announcements, and messages from the council, executive committee, municipal enterprises, institutions, and organizations for the past two years on the website?	medium complexity	required by the law
A16005	Is there an archive of plenary session minutes for at least the past two years on the website?	medium complexity	required by the law
A16006	Are draft decisions published 20 working days prior to their review by the executive committee?	complex	required by the law
A16007	Is the archive of commission minutes for the past two years available on the official website?	medium complexity	required by the law
A16008	Is the contact information for local council members available on the official website: 1. Landline business phone number; 2. Personal cell phone number (or a social media profile); 3. Email; 4. Physical office address or, alternatively, online office address; 5. Full names of assistants?	simple	required by the law
A16009	Is the archive of executive committee minutes for the past two years available on the official website?	medium complexity	good practice
Access and participation			
A16011	Can the public attend meetings of local council commissions without prior approval of their members?	simple	required by the law
A16012	Can the public attend meetings of the advisory agency (presidium, board, conciliation board etc.), if such an agency has been created, without prior approval of the local council members?	simple	good practice
A16013	How active are citizens in using the official website (web-portal)?	complex	good practice

A16014	Is information on the participatory budget published on the website?	complex	good practice
A16015	Are draft council decisions published 20 working days prior to their review at the plenary meeting?	medium complexity	required by the law
A16016	Is the list of open data for publication by city council, executive agencies, communal institutions and enterprises approved and published?	medium complexity	required by the law
A16017	Is the full agenda of meetings published 10 days prior to the plenary meeting of the scheduled council session with the list of all titles of draft decisions scheduled for review?	medium complexity	required by the law
A16018	Is there an option to send an electronic inquiry (citizen's appeal, information request or a different kind of letter) to the council?	simple	good practice
Procurement			
A16021	Does the municipality use a specific public service or an alternative official web resource on procurement where complaints, proposals and appeals are available, as well as responses to them and measures taken (such as www.dozorro.org)?	medium complexity	good practice
A16022	Has the regulation or a different regulatory document on pre-threshold procurement been developed and published for all executive agencies, structural units and subordinate municipal enterprises, institutions and organizations?	complex	good practice
A16023	Is information on all procurements made by subordinate municipal agencies, institutions and enterprises for less than UAH 50,000 available in machine readable format (ERDPOU (national registration) code of the procuring entity, the name of the procuring entity, ERDPOU (national registration) code of the supplier, the name of the supplier, the procurement item, the agreement amount)?	medium complexity	required by the law
A16024	Has a regulatory document requiring the use of a public service for rapid responses to complaints, proposals and appeals and obliging the council to provide responses to them (such as www.dozorro.org) been approved at the local level?	complex	good practice
A16025	Is information on current procurement of the entire city (the council, executive agencies, structural units, municipal enterprises, establishments and organizations) available on the official website?	simple	required by the law
A16026	Is a list (structure) of all executive agencies, municipal facilities, enterprises and organizations under the local council, which work with procurement, published on the official website in machine readable format?	simple	required by the law
A16027	Is general information on procurement results for the past 3 years available on the official website: a) competitive/non-competitive; b) above-threshold/pre-threshold; c) the number and amounts of contracts; d) top procuring entities and top winners?	medium complexity	good practice

Housing policy			
A16031	Is there a system of electronic registration of applications for housing and an online waiting list that allows applicants to track their status?	complex	good practice
A16032	Is information on residential facilities of communal ownership available on either an official website or an alternative site, and is this information updated at least once every six months? a) The total number of residential facilities, b) the number of leased residential facilities, c) the number of available residential facilities d) the number of rooms in dormitories).	medium complexity	required by the law
A16033	Is information on the methods and criteria for housing distribution available on the official website?	simple	required by the law
A16034	Are announcements on upcoming public commission meetings on housing issues published on the official website or on a different specialized website?	simple	good practice
A16035	Is the waiting list for renovation and minor repairs of residential buildings* available online? *A residential building is understood as any residential building in the community, including those with a co-owners association, high-rise buildings, detached houses, residential dormitories etc.	complex	required by the law
A16036	Are minutes of the public commission meetings on housing issues published on the official website or a different specialized website?	simple	good practice
Budgeting process			
A16041	Is information on item-by-item budget allocation published?	complex	good practice
A16042	Are changes to the budget published on the official website 20 working days before their review so the public can make proposals etc.?	medium complexity	required by the law
A16043	Are reports on budget implementation for 2016-2017 available?	simple	required by the law
A16044	Is the current cost sheet of the local council and its agencies available on the official website (the part of the budget that funds the "public administration")?	simple	required by the law
A16045	Are the budgets for the past three years available on the official website?	simple	required by the law
A16046	Are public hearings on the budget held and do they include diverse groups, such as women, disabled people, retired people etc.?	medium complexity	good practice
A16047	Is the budget regulation or a different specialized document approved regulating the procedure of review and approval of changes to the budget and public participation in the budgeting process?	complex	good practice

Financial assistance, grants			
A16051	Are competitions on distribution of funds among civil society institutions held?	medium complexity	good practice
A16052	Are there rules for regulating the potential conflict of interest among participants competing for municipal funding and members of the decision-making panels who are not local officials at the same time?	medium complexity	good practice
A16053	Can the public attend meetings where the allocation of funding to individuals or legal entities is discussed?	medium complexity	good practice
A16054	Are decisions on the allocation of funding available on the official website?	simple	required by the law
A16055	Are decisions, protocols or documents on the denial of funding available on the official website?	simple	required by the law
A16056	Is information published on unsuccessful candidates or projects for funding (proposals on joint events with the city hall, requests for financial assistance, projects and proposals of action groups etc.)?	simple	good practice
A16057	Is information on assessment (monitoring) of individual projects/events etc. funded under each of the executive agencies available on the official website?	simple	required by the law
A16058	Is the archive of decisions on the allocation/denial of financial assistance for at least the past two years available on the official website?	medium complexity	required by the law
Social services			
A16061	Does the official website or a specialized website contain a list of municipal social assistance institutions (rehabilitation centers, social service centers for elderly people, at-home social services etc.) and types of assistance or services they provide, including direct links to their websites or alternative contact information, as well as the list of those eligible for such social assistance?	simple	required by the law
A16062	Does the official website or a specialized website contain the option to file an online application to receive a place in a municipal institution of a service from social assistance and to track the application status?	complex	good practice
A16063	Is information on job openings in every social assistance institution available on the official website? Are the job postings free from discrimination on the basis of gender, age or disability?	simple	required by the law
A16064	Does the official website or a specialized website contain information on what audience (broken down by gender, socio-demographic group or age) used social institutions as well as what services they used?	medium complexity	good practice
HR issues			
A16071	Does the website contain announcements on selection procedures to executive agencies, including the job description and the publication date of the job posting? Is the job posting free of discriminatory restrictions (based on gender, age or disability)?	simple	required by the law

A16072	Are procedure protocols used for the selection of candidates to executive committees, including the full names of the selection panel members, available on the official website? Is the gender balance of women and men ensured (30/70)?	simple	good practice
A16073	Are the final grades of the selection panel, protocols and rankings of the candidates who were and were not selected during the past two years available on the website?	simple	required by the law
A16074	Is the biography of the mayor (including information on his education and work experience) available on the website?	simple	good practice
A16075	Does the mayor's biography or any other website section contain information on the mayor's connections with commercial and non-commercial organizations that existed before he took office?	medium complexity	good practice
Professional ethics, conflict of interest			
A16081	Is the Code of Council Member Ethics or a similar document adopted at the municipal level? Does the document contain the principles of non-discrimination and gender equality?	complex	good practice
A16082	Is the Ethics Code, or a similar document, approved on the municipal level for officials, employees of municipal enterprises, institutions and organizations as well as of community-founded companies with a public share of 50% or more and of organizations which are partly community-funded? Does the document contain principles of non-discrimination and gender equality?	complex	good practice
A16083	Is there a special tool or procedure as part of the regulation, statute or another council document to report unethical behavior, discrimination (gender-based or otherwise) or the conflict of interest of council members, officials, employees of municipal enterprises, institutions and organizations as well as of community-founded companies with a public share of 50% or more and of organizations which are partly community-funded (a hotline, an electronic form, a special authorized representative etc.)? A tool or a procedure is understood as a separate decision of the council, or part of a council decision (regulation, provision, rule etc.) or these issues being included in the job description of a certain official, which is verified by a respective document.	complex	good practice
A16084	Is information on results of the review of whistleblower reports on the conflict of interest or unethical behavior of officials or council members available, and is information on the response and measures taken for the period since April 2016 also available?	complex	good practice
A16085	Does the official website contain information on the political affiliation of local council members: a) membership in a political party at the moment of election; b) current membership in a political party; c) membership in a faction)?	medium complexity	good practice
A16086	Is a special document adopted that creates a mechanism for, and regulates the procedure of, identification, settlement and prevention of conflict of interest?	complex	good practice

Land & construction			
A16091	Are lists of available land and proposals for investors published on the official website or a specialized website?	medium complexity	required by the law
A16092	Does the official website or a specialized website contain documents (forms, templates, applications, guidelines etc.) that must be submitted in order to lease land, privatize it or carry out any other legal operation with it?	simple	required by the law
A16093	Are zoning plans available on the official website?	medium complexity	required by the law
A16095	Is there a system of electronic registration of permits for the installation of temporary structures, small architecture forms, terraces etc.?	complex	good practice
A16096	Does the official website or a different specialized website of the council contain information on current land tax rates and available tax deductions in the current period?	simple	required by the law
A16097	Is the list with exact titles of draft decisions on land issues included in the published council agenda (or is everything reviewed under the umbrella term "land issues"?)	simple	required by the law
A16098	Are public competitions (auctions) held where community-owned land is sold?	complex	required by the law
A16099	Are detailed territorial plans published?	medium complexity	required by the law
A16100	Is the general city plan published?	medium complexity	required by the law
Municipal enterprises			
A16101	Are financial reports (balance sheet, a report on losses and profits (financial results), a funds flow statement, a report on expenditures included in authorized capital of enterprises) from municipal enterprises and unions where 50% or more is owned by the city council published?	simple	required by the law
A16102	Does the official website or an alternative specialized website contain a list of all municipal enterprises (MEs) and unions where 50% or more is owned by the community, which work under local self-government authorities, including information on the share (%) owned by the community as well as information on them such as their address, telephone number, email, information on the services they deliver and works they carry out?	simple	required by the law
A16103	Are municipal enterprises registered at spending.gov.ua?	simple	required by the law
A16104	Do local self-government authorities' websites or municipal enterprises' websites contain CVs of heads of MEs and unions where 50% or more is owned by the community?	simple	required by the law
A16105	Are local council members and representatives of the public on supervisory boards of MEs and unions where 50% or more is owned by the community?	medium complexity	good practice
A16106	Are the structure, principles of formation and remuneration amounts of the administration (top management) of the MEs and supervisory board members published?	medium complexity	required by the law

A16107	Are annual reports of the supervisory board and administration of the enterprise published?	simple	required by the law
A16108	Has the external independent audit of MEs' (or unions where the share of the city council exceeds 50%) been conducted?	complex	good practice
A16109	Has the report based on the results of the external independent audit of the consolidated financial statements of MEs (or unions where the share of the city council exceeds 50%) been published?	complex	required by the law
A16110	Is information published on the tariffs and procedures of their formation for services delivered, goods sold and works performed by municipal enterprises?	simple	required by the law
Municipal property			
A16111	Has the city administration, its subordinate municipal establishments and organizations, used the system of electronic auctions for sale or lease of property at least once since January 1, 2017 until now?	complex	required by the law
A16112	Does the official website contain the address, phone number, email, full name of the head and the structure of the agency in charge of accounting, lease, sale and other operations with municipal property?	simple	required by the law
A16113	Does the official website contain information on current results and protocols of sale or lease of communal property?	simple	required by the law
A16114	Are the archive and protocols of outcomes of open sale or lease of communal property for the past three years published?	medium complexity	required by the law
A16115	Does the official website contain a list of all buildings and facilities owned by the community?	medium complexity	required by the law
A16116	Does the official website contain a list of all property (buildings, facilities) that can be leased or made available for use in some other way?	medium complexity	required by the law
A16117	Does the official website contain a list of property (buildings, facilities) that has been leased or made available for an alternative use (including information on the terms of such agreements)?	medium complexity	required by the law
Education			
A16121	Is a form of open distribution of places (such as an open waiting list, registration, lottery, randomizer etc.) used as the principal method for distributing places in preschool institutions?	complex	good practice

A16122	Are the terms of acceptance of children to preschool institutions available on the official website or a specialized website?	simple	good practice
A16123	Does the official website or a specialized website contain an option to file an online application to receive a place in an educational establishment (such as kindergartens, schools etc.)?	complex	good practice
A16124	Does the official website or a specialized website contain a system for electronically tracking applications to educational institutions or a different tool that allows applicants to track their status and check waiting lists online?	complex	good practice
A16125	Does the official website or a specialized website contain information on the location of out-of-school education services, music and art schools, the schedule and types of proposed clubs etc., as well as the option to sign a child up for these activities?	medium complexity	good practice

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