Independent Reporting Mechanism (IRM): Ukraine End-of-Term Report 2016–2018

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Overview: Ukraine

Independent Reporting Mechanism (IRM) End-of-Term Report 2016–2018

The third national action plan resulted in major achievements in several policy areas. New reports on the extractive sector and the introduction of online tools for monitoring public contracting led to outstanding changes. However, the verification system for beneficial ownership of companies was not implemented. Moving forward, the government needs to continue with transparency reforms and prioritize commitments that produce tangible results in the fight against corruption.

The Open Government Partnership (OGP) is a voluntary international initiative that aims to secure commitments from governments to their citizenry to promote transparency, empower citizens, fight corruption, and harness new technologies to strengthen governance. The Independent Reporting Mechanism (IRM) carries out a review of the activities of each OGP-participating country. This report summarizes the results of the period December 2016 through August 2018.

The Cabinet of Ministers of Ukraine represents the leading office responsible for coordinating Ukraine's OGP process and action plan. Two persons from the Secretariat of the Cabinet of Ministers coordinate national OGP activities. A multi-stakeholder group, the Coordination Council, established in June 2012 and renewed in February 2017, oversees the implementation of the national action plan. The law requires the council to have 14 members. Those members should come from both public authorities and civil society.

Ukraine has substantially advanced in implementing the starred commitment on public procurement and fully implemented the starred commitment on the Extractive Industries Transparency Initiative.

The government published its end-of-term self-assessment report at the end of November 2018.

At the time of writing this report, Ukraine had not published its fourth action plan. However, the government had conducted consultations with various institutions, civil society and public.

Table 1: At a Glance	Mid-term	End of term
Number of Commitments	13	
Level of Completion		
Completed	2	6
Substantial	6	4
Limited	5	3
Not Started	0	0
Number of Commitments with...		
Clear Relevance to OGP Values	11	11
Transformative Potential Impact	3	3
Substantial or Complete Implementation	8	10
All Three (✪)	2	2
Did It Open Government?		
Major	3	
Outstanding	2	
Moving Forward		
Number of Commitments Carried Over to Next Action Plan	Unclear	

This report was prepared by Dmytro Khutkyy, an independent researcher

Consultation with Civil Society during Implementation

Countries participating in OGP follow a process for consultation during development and implementation of their action plan.

In Ukraine, the multi-stakeholder forum is institutionalized in the form of Coordination Council. It includes seven representatives from authorities and seven from civil society. The council has two co-chairs, one from the government and one from civil society.

During the first year, the multi-stakeholder group conducted its work informally. Initially, work evolved this way due to the transition period, during which members were elected. Later, challenges of gathering a quorum led to a more informal nature for the work. The newly elected council members met in May 2017 at a methodological workshop on OGP.

The second year witnessed more organized, yet rare, activity from the multi-stakeholder forum. An official meeting of the new Coordination Council took place in October 2017. The council elected the co-chair from civil society and established work procedures. It also created four sectoral working groups comprising authorities and civil society partners.

In practice, the Secretariat of the Cabinet of Ministers monitored the overall OGP process. Simultaneously, dedicated council members both from authorities and civil society took the lead in monitoring and pushing forward sectoral commitments.

Civil society co-created the council agenda and were engaged in working groups. Furthermore, within individual commitments, joint authorities–civil society working groups established a format for iterative dialogue. This stands true especially on the draft law on public consultations and on the e-democracy roadmap. Such work merits the "collaboration" level of public participation.

Table 2: Consultation during Implementation

Regular Multi-stakeholder Forum	Midterm	End of Term
1. Did a forum exist?	Yes	Yes
2. Did it meet regularly?	No	No

Table 3: Level of Public Influence during Implementation

The IRM has adapted the International Association for Public Participation (IAP2) "Spectrum of Participation" to apply to OGP.[1] This spectrum shows the potential level of public influence on the contents of the action plan. In the spirit of OGP, most countries should aspire for "collaborative."

Level of Public Influence during Implementation of Action Plan		Midterm	End of Term
Empower	The government handed decision-making power to members of the public.		
Collaborate	There was iterative dialogue AND the public helped set the agenda.	✔	✔
Involve	The government gave feedback on how public inputs were considered.		
Consult	The public could give inputs.		
Inform	The government provided the public with information on the action plan.		
No Consultation	No consultation		

[1] "IAP2's Public Participation Spectrum," International Association for Public Participation, http://c.ymcdn.com/sites/www.iap2.org/resource/resmgr/foundations_course/IAP2_P2_Spectrum_FINAL.pdf.

About the Assessment

The indicators and method used in the IRM research can be found in the IRM Procedures Manual.[1] One measure, the "starred commitment" (✪), deserves further explanation due to its particular interest to readers and usefulness for encouraging a race to the top among OGP-participating countries. Starred commitments are considered exemplary OGP commitments. To receive a star, a commitment must meet several criteria:

- Starred commitments will have "medium" or "high" specificity. A commitment must lay out clearly defined activities and steps to make a judgment about its potential impact.
- The commitment's language should make clear its relevance to opening government. Specifically, it must relate to at least one of the OGP values of Access to Information, Civic Participation, or Public Accountability.
- The commitment would have a "transformative" potential impact if completely implemented.[2]
- The government must make significant progress on this commitment during the action plan implementation period, receiving an assessment of "substantial" or "complete" implementation.

Starred commitments can lose their starred status if their completion falls short of substantial or full completion at the end of the action plan implementation period.

In the midterm report, Ukraine's action plan contained two starred commitments. At the end of term, based on the changes in the level of completion, Ukraine's action plan still contained two starred commitments.

Finally, the tables in this section present an excerpt of the wealth of data the IRM collects during its reporting process. For the full dataset for Ukraine, see the OGP Explorer at www.opengovpartnership.org/explorer.

About "Did It Open Government?"

To capture changes in government practice, the IRM introduced a new variable "Did It Open Government?" in end-of-term reports. This variable attempts to move beyond measuring outputs and deliverables to looking at how the government practice has changed as a result of the commitment's implementation.

As written, some OGP commitments are vague and/or not clearly relevant to OGP values but achieve significant policy reforms. In other cases, commitments as written appear relevant and ambitious, but fail to open government as implemented. The "Did It Open Government" variable attempts to capture these subtleties.

The "Did It Open Government?" variable assesses changes in government practice using the following spectrum:

- Worsened: Government openness worsens as a result of the commitment.
- Did not change: No changes in government practice.
- Marginal: Some change, but minor in terms of its effect on level of openness.
- Major: A step forward for government openness in the relevant policy area, but remains limited in scope or scale.
- Outstanding: A reform that has transformed "business as usual" in the relevant policy area by opening government.

To assess this variable, researchers establish the status quo at the outset of the action plan. They then assess outcomes *as implemented* for changes in government openness.

Readers should keep in mind limitations. IRM end-of-term reports are prepared only a few months after the implementation cycle is completed. The variable focuses on outcomes that can be observed in government openness practices at the end of the two-year implementation period. The report and

the variable do not intend to assess impact because of the complex methodological implications and the time frame of the report.

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[1] IRM Procedures Manual, "About the IRM," Open Government Partnership, http://www.opengovpartnership.org/about/about-irm.

[2] The International Experts Panel changed this criterion in 2015. For more information, visit http://www.opengovpartnership.org/node/5919.

Commitment Implementation

General Overview of Commitments

As part of OGP, countries are required to make commitments in a two-year action plan. The tables below summarize the completion level at the end of term and progress on the "Did It Open Government?" metric. For commitments that were complete at the midterm, the report will provide a summary of the progress report findings but focus on analysis of the "Did It Open Government?" variable. For further details on these commitments, please see the Ukraine IRM progress report 2016–2018.

The commitments cover several topics. They can be best grouped by the core open government values. These include actions related to access to information, civic participation, and use of technology to improve transparency. The plan also includes two important commitments focusing on decentralization and expansion of administrative services. However, these two commitments are not clearly relevant to OGP values.

Table 4: Assessment of Progress by Commitment

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion (Midterm / End of Term)				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
1. Improve the quality and transparency of administrative services		✔			Unclear					✔				✔ (MT)	✔ (ET)				✔		
2. Introduce administrative e-services				✔	Unclear					✔					✔ (MT) ✔ (ET)				✔		
3. Ensure the filing and publication of e-declarations				✔	✔			✔		✔					✔ (ET)	✔ (MT)				✔	
4. Provide free public access to urban planning documentation		✔			✔			✔		✔				✔ (MT) ✔ (ET)					✔		
5. Ultimate beneficial				✔	✔			✔			✔			✔				✔			

	G1	G2	G3	G4	O1	O2	O3	O4	O5	P1	P2	P3	B1	B2	B3	R1	R2	R3	R4	R5
owners verification system														✔						
6. Construction Sector Transparency Initiative standards				✔	✔						✔			✔	✔			✔		
7. Online "Transparent budget" system		✔			✔			✔		✔			✔		✔			✔		
✪8. Openness and transparency in public procurement			✔		✔	✔		✔				✔		✔						✔
✪9. Extractive Industries Transparency Initiative			✔		✔							✔		✔	✔					✔
10. Public monitoring of the state of the environment			✔		✔						✔		✔	✔			✔			
11. "Community policing" system			✔		✔	✔					✔			✔	✔				✔	
12. Develop a draft law on public consultations			✔			✔					✔			✔	✔			✔		
13. Elaborate e-democracy roadmap		✔				✔		✔		✔					✔				✔	

1. Improve the quality and transparency of administrative services

Commitment Text:

Improvement of quality and transparency in the provision of administrative services:

1) Decentralization of powers to provide the most important administrative services for the public and the integration of basic administrative services in administrative service centers.

Expected results: Delegation of powers for the provision of the main administrative services to the local authorities (the appropriate regulations have been adopted) and/or provision of the following services through the administrative service centers:

- *Issuance of internal passports to Ukrainian citizens and passports for citizens of Ukraine to travel abroad.*

- *State registration of land plots, entry and retrieval of information from the State Land Cadastre*

- *State registration of civil records.*

2) Monitoring of the functioning of the administrative service centers.

Expected results: Creation of an information system for monitoring the functioning of the administrative service centers.

3) Holding of information and explanatory campaigns regarding the provision of administrative services, including in united local communities.

Expected results: Raising of awareness among the public about the operation of the administrative service system through the administrative service centers. Implementation of educational campaigns regarding the procedure for obtaining administrative services. Holding of webinars for representatives of civil society institutions on reforming the administrative services system. Distribution of the appropriate social advertising materials. Creation of specialized educational programs.

Responsible Institutions: Ministry of Justice, Ministry of Internal Affairs, Ministry of Regional Development, Ministry of Agricultural Policy, State Agency for E-governance, State Land Cadastre, Regional and Kyiv Municipal State administrations, local government authorities (by consent); Ministry of Economic Development, State Agency for E-governance, local state administrations; Ministry of Information Policy, Ministry of Regional Development, Ministry of Economic Development, State Agency for E-governance, other central executive agencies, Regional and Kyiv Municipal State administrations, local government authorities (by consent).

Supporting Institutions: Center for Policy and Legal Reform non-governmental organization, other civil society institutions and international organizations (by consent); Center of Policy and Legal Reform and Transparency International Ukraine non-governmental organizations, other civil society institutions and international organizations (by consent); Civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity	OGP Value Relevance (as written)	Potential Impact	Completion	Midterm	Did It Open Government?
					End of Term	

1. Quality and transparency of administrative services	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
		✔			Unclear						✔			✔ / ✔					✔		

Commitment Aim:

The commitment aims to decentralize the provision of administrative services by establishing regional administrative service centers. Commitment activities include monitoring the functioning of the service centers and conducting an awareness-raising campaign about services provided by the centers.

Status

Midterm: Limited

This commitment made limited progress by midterm. The Ministry of Economic Development and Trade reported that by the end of September 2017, 675 administrative service centers, 48 territorial divisions, and 20 distance working places were operational.[1] However, only in 31 of these did the government make available the full 15 common administrative services.[2] Further, only 20 had the equipment to process all of the services.[3] The monitoring component of the commitment was in its initial phase. The government made more progress in the public awareness campaign. It reported holding 800 meetings with citizens and media, producing 35,000 informational materials in both national and regional print media, conducting four educational campaigns, and holding 338 awareness-raising events.[4] For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Substantial

During the second year, the government furthered its progress by increasing the number of service centers and the number of services offered. It also made progress in adopting the relevant regulations for delegating authority to administrative centers. In October 2017, the Cabinet of Ministers passed regulation #782. The regulation delegated more services to local administrative centers.[6] These services included the following:

- the registration of worker safety conditions declaration (#52),
- the registration of off-road technological vehicles (#54),
- the registration of a declaration that a real estate object is ready for operation (#78),
- the issuance of construction permission (#79),
- the issuance of an construction object's acceptance for operation declaration (#80),
- the registration of waste declaration (#84),
- the state (re)registration of vehicles (#102),
- the issuance (exchange) of driver's licenses (#103), and
- the state registration of civil status (#104).[7]

Due to the above-mentioned regulation, local administrative centers now have the mandate to deliver to citizens or transfer to other agencies 136 administrative services.[8] Also, on 29 August 2018 the Ministry of Justice issued a decree authorizing administrative service centers to perform the state registration of civil records.[9]

While the Cabinet of Ministers has passed the regulation mentioned above, Parliament has not adopted the planned changes to legislation. In particular, the draft law on the decentralization of state registration of civil records (#6150) is still under review by the Parliament.[10] Also, the draft law on the state registration of land plots (#8049) has not yet come before Parliament for a vote.[11] Moreover, the Ministry of Internal Affairs still processes vehicle registrations and driver's license issuances, and the local administrative centers serve only as intermediaries.[12]

The government established several new administrative service centers in cities. According to the government, as of November 2018, 112 administrative service centers issued passports for citizens of Ukraine to travel abroad.[13] This accounts for approximately 14.6 percent of all centers. The government reported that 213 officials of local self-government bodies and 45 administrative service centers were able to retrieve information on the registration of land plots from the State Land Cadastre.[14] Furthermore, the government authorized 62 village councils, 56 city councils, and 90 administrative service centers to issue certifications about registered land plots into the State Land Cadastre.[15] Moreover, on 6 August 2018 the State Agency for E-Governance and EGOV4UKRAINE signed a memorandum for the pilot testing of the information system Vulyk in 10 cities. This action helped the centers to automate provison of services.[16]

The government has developed systemic monitoring of the administrative service centers. The government representative explained that the government conducts monitoring in paper format. Using this data, administrative service centers fill in an Excel table. Information from that table is then aggregated at the regional level and presented to the Ministry of Economic Development and Trade.[17] In addition, 10 administrative service centers are testing a digital monitoring system with a set of indicators, rankings, and map visualizations.[18] A civil society expert confirmed the existence of the monitoring system, which is regularly updated by the ministry.[19] As part of his work for U-LEAD, this expert routinely communicates with the Ministry of Economic Development and Trade. The government has made the results of the monitoring (as of 1 July 2018) publicly available in the format of infographics: 767 administrative service centers were created. The government has relatively evenly geographically distributed the centers across regions. In the first half of 2018, 29 new centers were created. Of all administrative service centers, only 16 percent provided fewer than 50 services. Fifty-six percent provided 50-135 services, 23 percent provided 136-200 services, and 5 percent provide over 200 services. Only 16 percent were able to access the State Land Cadastre, and only 29 percent provided e-services.[20]

The wide awareness-raising campaign continued. In particular, the government used TV promotion and social media. It also used visualization of the centers on Google Maps, with real-time information about the centers' workloads.[21] A civil society expert noted the assistance of international technical support programs, such as U-LEAD with Europe, with the information campaign activities.[22]

Did It Open Government?
Access to Information: Marginal

Despite a lack of clear connection with core OGP values, this commitment has had some effect on improving public access to information about the availability of administrative services. Citizens can now find many of the functioning administrative service centers on Google Maps.[23] They can also find the centers' addresses, phone numbers, and working hours. Citizens can check the centers' websites and learn useful legal and practical information about the administrative services provided. The government made a substantial effort to inform citizens both offline and online[24,25] about available administrative services and how to obtain them. Offline efforts involved notice in other government agencies. Online efforts included maintenance of the ministry's website and information on Google

Maps. These efforts contributed to marginal improvement in access to information about the functioning of the centers and the range of provided services.

Carried Forward?

The government had not approved the next action plan when this report was written. Thus, it is not clear if this commitment will be carried forward. Given the importance of decentralization reform in Ukraine, the government needs to continue measures to improve administrative service delivery beyond the OGP framework, with accompanying awareness campaigns, and monitoring.

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[1] "The Information about the Centers for the Provision of Administrative Services in the Regions of Ukraine (as of 01.10.2017)," Activities, Ministry of Economic Development and Trade of Ukraine, 19 October 2017, http://www.me.gov.ua/Documents/Detail?lang=uk-UA&id=8383e170-308f-4578-844c-18536964b218&title=InformatsiiaSchodoTsentrivNadanniaAdministrativnikhPoslugURegionakhUkraini-stanomNa01-10-2016-. (link no longer accessible as of 13 February 2019

[2] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[3] Ibid.

4 "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.

[5] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[6] "Cabinet of Ministers of Ukraine. The Regulation on 11 October 2017 #782-p, the Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, http://www.kmu.gov.ua/control/uk/cardnpd?docid=250401348.

[7] Ibid.

[8] Ibid.

[9] "The Ministry of Justice of Ukraine. The Decree on 29 August 2018 #2825/5," the Verkhovna Rada of Ukraine: The Official Web-portal, http://zakon.rada.gov.ua/laws/show/z0979-18#n2.

[10] "The Draft Law on Amendments to the Law of Ukraine 'On State Registration of Civil Records,'" #6150, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=61255.

[11] "The Draft Law on Amendments to the Law of Ukraine 'On State Land Cadaster,'" #8049, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?id=&pf3511=63506.

[12] "Cabinet of Ministers of Ukraine. The Regulation on 11 October 2017 #782-p, The Government Portal."

[13] "The Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership initiative in 2016–2018," the Secretariat of the Cabinet of Ministers of Ukraine. https://www.kmu.gov.ua/storage/app/media/17-civik-2018/partnerstvo/zvit_OGP%202016-2018.doc

[14] Ibid.

[15] Ibid.

[16] "A Memorandum on the Introduction of the Information System 'Vulyk' Has Been Signed," News, State Agency for E-Governance of Ukraine, 7 August 2018, https://www.e.gov.ua/content/pidpysano-memorandum-stosovno-vprovadzhennya-informaciynoyi-systemy-vulyk.

[17] Oleksandr Kamenchuk (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 7 August 2018.

[18] Ibid.

[19] Victor Tymoshchuk (Center of Policy and Legal Reform), interview with IRM researcher, 9 August 2018.

[20] "The Network of Administrative Service Centers in Ukraine," Ministry of Economic Development and Trade of Ukraine, http://www.me.gov.ua/Documents/Download?Id=d8841ecb-c14c-4aeb-8aa9-7663e5229c24.

[21] Oleksandr Kamenchuk (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 7 August 2018.

[22] Victor Tymoshchuk (Center of Policy and Legal Reform), interview with IRM researcher, 9 August 2018.

[23] Google Maps, https://www.google.com/maps.

[24] "Administrative Services," Ministry of Economic Development and Trade of Ukraine, http://www.me.gov.ua/Tags/DocumentsByTag?lang=uk-UA&id=1998a31e-a0ce-4f64-9b74-ed7212f0522b&tag=AdministrativniPoslugi.

[25] Google Maps, https://www.google.com/maps.

2. Introduce administrative e-services

Commitment Text:

Introduction of administrative services provided in electronic form:

1) Extension of the functionality of the unified state portal for administrative services in order to provide administrative services in electronic form.

Expected results: Development of draft regulations on the maintenance procedures and operational requirements of the unified state portal for administrative services and the submission of these drafts in accordance with established procedures for consideration by the Government. Integration of information systems and information resources into the unified state portal for administrative services. Operation of the common platform for the provision of administrative services on the basis of the unified state portal for administrative services.

Provision of administrative services in electronic form (complete cycle):
in 2016 — 15 services
in 2017 — 20 services
in 2018 — 25 services.

2) Introduction of the unified system for electronic interaction between government information resources.

Expected results: Development of a draft regulation on electronic interaction between government electronic information resources and submission of the draft in accordance with established procedures for consideration by the Government. Development of software application interfaces for granting access to priority government electronic information resources.

Connection to electronic interaction:
in 2016 — 10 priority government electronic information resources
in 2017 — 20 priority government electronic information resources
in 2018 — 30 priority government electronic information resources.

3) Introduction of modern tools for the electronic identification of individuals and legal entities.

Expected results: Development of draft regulations regarding the implementation of the electronic identification of individuals and legal entities in the governmental information and telecommunication systems and submission of the drafts in accordance with established procedures for consideration by the Government (May 2017). Development of the appropriate technological base (June 2018).

Responsible Institutions: Ministry of Economic Development, State Agency for E-governance, other central executive agencies, Regional and Kyiv Municipal State administrations; State Agency for E-governance, Ministry of Economic Development, other central and local executive agencies, local government authorities (by consent); State Agency for E-governance, Ministry of Regional Development, Ministry of Justice, Ministry of Economic Development, State Special Communication Service.

Supporting Institutions: Transparency International Ukraine non-governmental organization, other civil society institutions and international organizations (by consent); Eidos Center for Political Studies and Analysis non-governmental organization, other civil society institutions and international organizations (by consent); Civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity	OGP Value Relevance (as written)	Potential Impact	Completion	Midterm	Did It Open Government?
					End of Term	

	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
2. Introduce administrative e-services				✔	Unclear					✔					✔ ✔				✔		

Commitment Aim:

The commitment seeks to extend the functionality of the Unified State Portal of Administrative Services. The extended functionality includes provision of services in electronic form and a unified system for electronic interaction between government information resources. The extension effort would also involve introducing tools for the electronic identification of individuals and legal entities.

Status
Midterm: Substantial

By midterm this commitment had made substantial progress. The unified portal (www.my.gov.ua) was fully active,[1] and as of November 2017, there were 52 services listed on it.[2] The government has issued three key documents on the interoperability of specific government information portals. The first is the decree on electronic interaction between government information resources.[3] Another involves a concept paper on the development of electronic services in Ukraine.[4] The third involves an action plan for the implementation of the concept paper.[5] According to the government's self-assessment report, it was pilot testing a project on interaction between basic public registries.[6] During this period the government had not developed draft regulations for the electronic identification of individuals and legal entities. For more information, please see the 2016–2018 IRM midterm report.[7]

End of term: Substantial

By September 2018 the Ministry of Economic Development and Trade had made steady progress on this commitment. On 23 May 2018 the Cabinet of Ministers issued decree #395, which advanced work in this area in five ways. The decree extended the functionality of the portal to integrate other public services provied by central and local authorities. It enabled e-identification not only by digital signature, but also by other means of identification. The decree also required the integratation of the digital workflow of state electronic information resources into the e-services portal. It established the responsibilities of the portal owner. And finally, the decree clarified the procedures for government agencies entering information into the portal.[8] The government provided cybersecurity protection for the portal, which was licensed by the State Special Communication Service.[9] The government also adjusted the website for easier use by people with poor eyesight. Futhermore, according to the ministry representative, the government intergrated three new services to the portal. These included one from the Ministry of Finance, one from the State Committee on Television and Radio, and one from the Ministry of Social Policy. The government also signed agreements with eight state agencies for further cooperation.[10] According to the government, the Unified State Portal of Administrative Services[11] allows citizens to obtain 34 services online (out of the targeted 60). It also provides legal and practical information on 1,000 services, 44 government agencies, and 750 administrative service centers. In addition, the portal directs users to 30 e-services on other government websites.[12]

There has been progress in the introduction of the unified system for electronic interaction between government information resources. On 10 May 2018 the government adopted decree #357. That decree introduced technical procedures for the electronic interaction between government information resources.[13] An expert who works for the EGOV4UKRAINE project, aimed at implementing e-governance reform, noted that the government and its partners are developing a Trembita information system. Trembita would provide a unified system for electronic interaction between government information resources.[14] The government planned to complete its cybersecurity component by the end of 2018.[15] The government reported that it had launched a pilot project of electronic interaction between all planned government information resources.[16]

According to the government, a user can register on the e-services portal using their BankID from the National Bank of Ukraine. The government is also conducting a pilot project testing the MobileID identification format.[17]

Overall, the government has begun to offer the planned number of e-services at the Unified State Portal of Administrative Services. However, the unified system for electronic interaction between government information resources has not been launched in a fully operational mode. Also, the tools for the modern electronic identification of individuals and legal entities need to be introduced more widely.

Did It Open Government?
Access to Information: Marginal

As written, this commitment was not directly relevant to core OGP values. However, as implemented, it has positively influenced access to information. Through the aggregation of various e-services, the portal facilitates easier searching and filing. Such efforts led to marginal change in improving access to information on provided e-services.

Carried Forward
When this report was written, the government had not yet published the next action plan. It is not clear if the government carried this commitment forward. For next steps, the Ministry of Economic Development and Trade and the State Agency for E-Governance could focus on developing draft regulations for the electronic identification of individuals and legal entities. These bodies could also ensure that BankID and MobileID can be used as alternative means of identification for obtaining public services. The ministry could develop an interactive guide for users explaining which services match their requests. The State Agency for E-Governance could announce the next priority services to be digitized and launch an awareness-raising campaign for citizens about e-services.

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[1] Unified State Portal of Administrative Services, www.my.gov.ua.
[2] Ibid.
[3] "The Resolution of the Cabinet of Ministers on 8 September 2016 #606," the Legislation of Ukraine, the Verkhovna Rada of Ukraine: The Official Web-Portal, http://zakon5.rada.gov.ua/laws/show/606-2016-%D0%BF.
[4] "The Resolution of the Cabinet of Ministers on 16 November 2016 #918-p," the Legislation of Ukraine, the Verkhovna Rada of Ukraine: The Official Web-Portal, http://zakon5.rada.gov.ua/laws/show/918-2016-%D1%80.
[5] "The Resolution of the Cabinet of Ministers on 14 June 2017 #394-p," the Government Portal, Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/250069939.
[6] "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.
[7] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf
[8] "Cabinet of Ministers of Ukraine. The Regulation on 23 May 2018 #395, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/pro-vnesennya-zmin-do-poryadku-vedennya-yedinogo-derzhavnogo-portalu-administrativnih-poslug.
[9] "About," Unified State Portal of Administrative Services, www.my.gov.ua.
[10] Victoria Herasymovych (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.
[11] Unified State Portal of Administrative Services, www.my.gov.ua.

[12] Victoria Herasymovych (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.

[13] "Cabinet of Ministers of Ukraine. The Regulation on 10 May 2018 #357," the Verkhovna Rada of Ukraine: The Official Web-Portal, http://zakon.rada.gov.ua/laws/show/357-2018-%D0%BF.

[14] Victor Tymoshchuk (Center of Policy and Legal Reform), interview with IRM researcher, 9 August 2018.

[15] Victor Tymoshchuk (Center of Policy and Legal Reform), communication with IRM researcher, 18 October 2018.

[16] "The Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership initiative in 2016–2018," the Secretariat of the Cabinet of Ministers of Ukraine. https://www.kmu.gov.ua/storage/app/media/17-civik-2018/partnerstvo/zvit_OGP%202016-2018.doc

[17] Ibid.

3. Ensure the filing and publication of e-declarations

Commitment Text:

Introduction of the system for filing and publication of declarations of entities authorized to perform the functions of national or local government, in accordance with the Law of Ukraine "On the prevention of corruption."

Expected results: Filing of declarations of the subjects to be declared as specified in article 3 of the Law of Ukraine "On the prevention of corruption."

Responsible Institutions: National Agency for the Prevention of Corruption, State Special Communication Service.

Supporting Institutions: UN Development Program in Ukraine "Enhanced Public Sector Transparency and Integrity", Transparency International Ukraine non-governmental organization, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
3. Ensure the filing and publication of e-declarations				✔	✔			✔		✔						✔ / ✔				✔	

Commitment Aim:

This commitment aims to implement the system for filing and publicizing declarations of individuals authorized to perform the functions of national or local government. Such implementation would be according to the law On the Prevention of Corruption.[1] During the previous action plan, the government created an open access unified web portal of civil servants' declarations of income, property, and expenditures.[2] In this action plan, the government committed to ensure training of civil servants on filing e-declarations, timely filing of declarations via a properly functioning online system, and the online publication of declarations.

Status
Midterm: Complete

By the midterm, the government had completed implementation of this commitment. The National Agency on Corruption Prevention (NACP) launched two statutory waves of online filing of e-declarations for public officials. The first wave of e-declaration filings (covering over 105,000 top officials[3]) occurred from 1 September to 30 October 2016. The second wave of filings (covering over 700,000 officials at other offices) occurred from 1 January to 1 May 2017. According to NACP, by 1

July 2017, as many as 1,127,588 original e-declarations were filed.[4] In addition, NACP published the unified e-declarations registry online in an open data format.[5] For more information, please see the 2016–2018 IRM midterm report.[6]

After the midterm assessment, the National Agency on Corruption Prevention (NACP) conducted one more statutory wave of filing e-declarations (for all public officials), occurring 1 January – 1 April 2018. Civil society experts noted that during the last wave, the online portal performed in a more stable manner. It suffered from fewer crashes. The reduced number of crashes may have resulted from improved processes: the declarants may have saved previous templates and submitted in advance.[7] As of 16 August 2018 the registry contained over 2,750,000 digital documents, including over 2,370,000 e-declarations, over 300,000 corrected documents, and over 80,000 notices of a substantial change in property status.[8] NACP also launched an online training for officials (primarily video lectures) on filing e-declarations and provided guidance by email and hotline on the correct submission of e-declarations. The agency conducted a registry audit, ensured access to other state registries,[9] and drafted law #7276, which would extend NACP's access to public information.[10] These actions mark the full completion of this commitment, as written.

NACP also partially implemented past IRM recommendations concerning the introduction of an automated verification software. On 24 October 2017, NACP approved procedures for evaluating each e-declaration, laying the legal foundation for future audits.[11] The procedures established criteria for ranking each declaration by risk indicators. On 20 August 2018, the United Nations Development Programme in Ukraine granted NACP the software for an automated audit of e-declarations. The software can compare data from declarations with the data from other registries (land register, customs register, and other fiscal registries) by 137 risk indicators.[12] This will enable the agency to identify the declarations incongruent with other state registries and therefore bearing high corruption risks. Thus, NACP can analyze them further and, if necessary, pass them over to the National Anti-Corruption Bureau of Ukraine for investigation. However, civil society experts warn of potential barriers, which may hinder the upcoming launch of the automated system of e-declarations audit. These barriers include obtaining cybersecurity certificates from the State Special Communication Service, political considerations stalling the identification of corrupt officials, and uncoordinated decision making within NACP.[13] From its side, NACP listed many technical and testing activities required to launch the automated system and promised to complete them by September 2018.[14] Although NACP introduced the technical system of verification by the end of September 2018, it has not started the actual verification of e-declarations.[15]

The IRM progress report noted the concern that authorities might abuse the new obligation for civil society leaders to submit asset declarations. The report also noted that noncompliance with this law could result in fiscal authority pressure on civil society organizations. On 29 March 2018 NACP issued a decree clarifying that anti-corruption activists are obliged to file e-declarations only if they satisfy all of three criteria. The first is that they receive funds or property within the frame of corruption prevention programs. The second notes they must systematically implement corruption prevention policies using those funds. Thirdly, these activists must be principals of civil society organizations conducting corruption prevention activities.[16] This obligation to report thus requires principals of internationally funded anti-corruption projects to declare their personal assets. However, the government exempts other employees from the obligation to disclose. An expert from the PACT ENGAGE project viewed this decree as a political action by NACP to stay on good terms with international programs. The decree does not require the majority of employees for these programs to submit e-declarations.[17] However, the law, which has a higher authority than the agency's decree, does not specify these criteria. Therefore, the requirement for asset disclosure remains broad and could potentially be used to put pressure on anti-corruption activists. The executive director of Transparency International Ukraine called it "the sword of Damocles" for civic activists.[18]

Did It Open Government?
Access to Information: Major

This commitment represents a significant step forward in opening a massive amount of information to the public. Prior to this action plan, officials submitted only paper declarations, which had a limited amount of information, were hard to obtain and process, and could be easily lost. The law On the Prevention of Corruption, adopted on 14 October 2014, mandated that officials disclose their assets online. The government developed a portal for filing e-asset declarations. Nevertheless, there was always a risk that the actual filing of e-declarations would never occur. Therefore, the government committed to enact the system for filing and publication of declarations. It supported that commitment with trainings for civil servants, enactment of related bylaws, launch of the public registry with all submitted data for most categories of officials and the very process of filing e-declarations.

Implementation of this commitment created an unprecedented amount of publicly available information on officials' assets. In contrast to paper declarations, the digital records can be easily copied and analyzed, thereby preventing data loss. Civil society and the media actively utilize this new source of information. Based on the monitoring of media investigations, it is estimated that about half of journalists' investigations about corruption and all of journalists' investigations about the lifestyles of officials are based on e-declarations data.[19] The data from the National Agency on Corruption Prevention (NACP) web portal allowed civil society activists to implement an independent project titled Declarations,[20] which contains both electronic declarations and digitized paper declarations. Declarations has a more user-friendly design, analytical modules, and subscription availability for news.[21]

Yet, the system has shortcomings that create potential barriers, limiting the scope of disclosed information. An activist from the civil society organization Anti-Corruption Action Center criticized the closed nature of certain categories of e-declarations. For example, the officials of the Secret Service of Ukraine file e-declarations into a separately classified system, while e-declarations of military prosecutors have disappeared from the registry.[22] Moreover, NACP updated the criteria to state that one-time income should be declared only if a person is able to use the funds to satisfy personal needs.[23] A civil society expert from the PACT ENGAGE project opined that authorities try to interpret the law in such a way that it loses its intent of full transparency.[24] For example, the nuance of this NACP update regarding change in property status is that until it is proven that a person is using one-time income for personal needs, the decree does not require them to declare that property.

That said, it is unclear how the e-declarations system and information disclosed through the portal affect government policy on recruitment or the dismissal of officials. NACP did not share the full e-declarations database with the National Anti-Corruption Bureau. In particular, NACP did not share the unique indentifier, which would allow a clear identification of persons. The lack of shared data complicates the investigation of felonies.[25] Civic activists note the absence of substantial criminal prosecution of high officials or even of many lower-ranking officials. That there exist no such prosecutions casts doubt on the effectiveness of the system.[26]

Carried Forward?
As the next action plan has not been released yet, it is unknown whether the government carried the commitment forward. The National Agency on Corruption Prevention (NACP) and the National Anti-Corruption Bureau (NABU) should be able to obtain access to all state registries and use available software of an automated verification of e-declarations. In particular, NACP could provide NABU the unique indentifier, which would allow a clear identification of persons in the registries.

Following the requests from Ukrainian civil society and the international community, the IRM researcher recommends that Parliament abolish legislative amendments that require civil society activists to submit e-declarations. Such legislation makes activists potential subjects of administrative and criminal prosecution.

1 "The Law of Ukraine 'On the Prevention of Corruption,'" #1700-VII, the Verkhovna Rada of Ukraine: The Official Web-Portal, http://zakon2.rada.gov.ua/laws/show/1700-18.

2 "Report on Implementation of the Action Plan for Introduction of the Open Government Partnership Initiative in 2014–2015," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_End-Term_Self-Assessment-Report_2014-16_EN.pdf.

3 The following are the top officials:
a. The president of Ukraine, members of the Parliament of Ukraine, the prime minister of Ukraine, the members of the Cabinet of Ministers of Ukraine, and heads of government agencies and their deputies;
b. Judges, prosecutors, investigators, and category A civil servants (according to the Law "On State Service"—civil servants of 1-3 categories); and
c. In local self-governance bodies: heads of oblast councils of oblast centers and their deputies, secretaries of city councils of oblast centers and their deputies, secretaries of city councils, mayors of cities of oblast significance, heads of rayon councils, heads of city district councils, and other officials of local self-governance of 1-3 categories.

4 "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.

5 "The Unified E-declarations Registry," National Agency for the Prevention of Corruption, https://portal.nazk.gov.ua/login.

6 "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

7 Vitalii Shabunin (Anti-Corruption Action Center), interview with IRM researcher, 28 August 2018.

8 Oleksandr Pysarenko (National Agency for the Prevention of Corruption), email exchange with IRM researcher, 5 September 2018.

9 The Unified State Registry of the Ministry of Internal Affairs; the Registry of Tax Payers Owning over 10% of Stock in Companies; the State Registry of Property Rights on Real Estate; the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups; the State Registry of Movable Property; the State Land Cadastre; the Unified State Registry of State Property; the State Naval Registry of Ukraine and Naval Book of Ukraine; the State Registry of Civil Aircrafts of Ukraine; the State Registry of Tax Payers; and the Integrated Information-Telecommunication System for Control of Persons, Vehicles, and Goods Crossing the State Border (the "Arkan" system).

10 Oleksandr Pysarenko (National Agency for the Prevention of Corruption), email exchange with IRM researcher, 5 September 2018.

11 "Decision #1019," National Agency on Corruption Prevention, https://nazk.gov.ua/sites/default/files/docs/2017/%D0%B7%D0%B0%D1%81%D1%96%D0%B4%D0%B0%D0%BD%D0%BD%D1%8F/24.10/24.10%20(1019).tif.

12 "UNDP Transferred the Software for an Automated Audit of E-declarations to NACP," Reanimation Package of Reforms, https://rpr.org.ua/news/proon-peredala-nazk-prohramne-zabezpechennya-dlya-avtomatychnoji-perevirky-elektronnyh-deklaratsij/.

13 Ibid.

14 "The National Agency Makes the Next Step to Introduce the System of Logical and Arithmetic Control of Declarations," National Agency on Corruption Prevention, https://nazk.gov.ua/news/nacionalne-agentstvo-zdiysnyuye-chergovyy-krok-iz-vprovadzhennya-systemy-provedennya-logichnogo.

15 The System of Logical and Arithmetic Control of Declarations has been Launched, National Agency on Corruption Prevention, https://nazk.gov.ua/news/systema-logichnogo-ta-aryfmetychnogo-kontrolyu-deklaraciy-vvedena-v-ekspluataciyu

16 "The Clarification on the Application of Particular Regulations of the Law of Ukraine 'On the Prevention of Corruption,'" National Agency on Corruption Prevention, https://nazk.gov.ua/sites/default/files/docs/2018/news/29.03.2018%20%28%B9549%29.tif.

17 Ivan Presniakov (PACT ENGAGE Project), interview with IRM researcher, 21 August 2018.

18 Yaroslav Yurchyshyn (Transparency International Ukraine), interview with IRM researcher, 27 August 2018.

19 Vitalii Shabunin (Anti-Corruption Action Center), interview with IRM researcher, 28 August 2018.

20 Declarations, https://declarations.com.ua/.

21 Ivan Presniakov (PACT ENGAGE Project), interview with IRM researcher, 21 August 2018.

22 Vitalii Shabunin (Anti-Corruption Action Center), interview with IRM researcher, 28 August 2018.

23 "The Notification about Considerable Change in Property Status," National Agency on Corruption Prevention, https://nazk.gov.ua/sites/default/files/docs/2018/povidomlennya_pro_suttyevi_zminy_v_maynovomu_stani.pdf.

24 Ivan Presniakov (PACT ENGAGE Project), interview with IRM researcher, 21 August 2018.

25 Vitalii Shabunin (Anti-Corruption Action Center), interview with IRM researcher, 28 August 2018.

26 Yaroslav Yurchyshyn (Transparency International Ukraine), interview with IRM researcher, 27 August 2018.

4. Provide free public access to urban planning documentation

Commitment Text:

Provision of free public access to urban planning documentation.

Expected results: Development of a draft law on amending article 18 of the Law of Ukraine "On the regulation of urban planning documentation (December 2017) and submission of the draft in accordance with established procedures for consideration by the Government. Compliance of the structure and content of urban planning documentation at the local level, as it concerns restricted access information, with legislative requirements for openness (December 2017). Development and implementation of the first stage of the software and hardware system for the urban planning cadastre at the state level, launch of the trial operation of the information system (June 2018).

Responsible Institutions: Ministry of Regional Development, Ministry of Defense, local state administrations, local government authorities (by consent), commercial entities in the field of the development of urban planning documentation (by consent).

Supporting Institutions: East Ukrainian Center for Civic Initiatives and Eidos Center for Political Studies and Analysis non-governmental organizations, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
4. Provide a free public access to urban planning documentation		✔			✔			✔		✔				✔ ✔					✔		

Commitment Aim:

This commitment aims to provide free public access to urban planning documentation. The government planned to develop the relevant draft legal amendments on the regulation of urban planning documentation. Such amendments would ensure that the structure and content of urban planning documentation complies with legal openness guidelines. The government also planned to develop and execute a trial operation for software and hardware systems for an urban planning cadastre.

Status

Midterm: Limited

By midterm, the commitment saw limited progress. The government has developed two relevant draft laws. Draft law #4585 is On Amendments to Some Laws of Ukraine on Improving Urban Development.[1] Draft law #6403 is On Amendments to the Law of Ukraine On the Regulation of

Urban Development Activities. [2] However, the parliament did not adopt these laws during the first year of the action plan. Moreover, in May 2017, the Cabinet of Ministers adopted decree #354,[3] which introduced changes to decree #559.[4] The changes led to the opening and publishing of urban planning documentation online. Regarding whether provisions of the law comply with openness practices, perceptions of stakeholders differ. Civil society experts note the cases of low transparency in some settlements, while authorities provide statistics demonstrating higher transparency in cities and lower transparency in villages. In October 2017, the Ministry of Agrarian Policy and Food, the State Agency of E-Governance, and Transparency International Ukraine (an external auditor of the system) announced the launch of an updated state land registry. For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Limited

By the end of the action plan term, Parliament had adopted neither of the draft laws regulating transparency of urban documentation. The government revoked draft law #4585, On Amendments to Some Laws of Ukraine on Improving Urban Development.[6] Parliament adopted draft law #6403, On Amendments to the Law of Ukraine On the Regulation of Urban Development Activities, in first reading. So it is being prepared for the second hearing. [7] However, the Ministry of Regional Development has developed a draft decree #220 On Adopting the Requirements for the Structure and Format of Publishing Information on Urban Planning Documentation in Internet. The decree was passed to the Ministry of Justice for review.[8] According to a report from a civil society expert who develops and advocates urban planning portals, few local authorities disclosed urban development plans in an open data format and even fewer disclosed detailed plans of territories.[9] For example, some municipalities published online a digital photo of poor quality and a report of poor completion. However, some municipalities (e.g., the cities of Dnipro, Zhytomyr, Kyiv, [10] Lviv,[11] Rivne,[12] and Chernivtsi) developed and published online geo-information portals with detailed and visual information.[13]

Civil society developed Open Budget, a municipal transparency and accountability e-services online platform.[14] As a module, it mapped construction and repair works of 15 communities. It also linked the building information with public registries (E-data, ProZorro, the Registry of Legal Entities, the Registry of Court Decisions), independent anti-corruption online monitoring resources (Anti-Corruption Monitor and Clarity Project), and independent online road monitoring resources (UARoads and Navizor). In addition, the platform visualized the projects on Google Maps.[15] This module operates for Drohobych,[16] Uzhgorod,[17] and Dnipropetrovsk oblast.[18] The state urban planning land registry would inform citizens and give the Service of Urban Planning Cadastre the authority to edit. However, the Ministry of Regional Development stated that it did not possess the required technical and software resources to launch it and that the state budget did not allocate the necessary funds to develop it.[19] Nevertheless, the ministry collaborated with the Better Regulation Delivery Office to develop an informative web resource through which anybody can obtain data about urban planning documentation. The ministry initially provided[20] a link to a malfunctioning website.[21] However, in September 2018, this online cadastre, with exclusive information functions, operated at a different web address.[22] The geo-information map appeared detailed. However, some land plots were missing digital information, and the official disclaimer warned of the possibility of geometrical mistakes on the map, such as overlapping land plots. The map reflects accurate information as of 2016. For each land plot, the map provides its cadastre number, and specifies the type of property (private or public), its function, area, and online links where one can request an official inquiry.

Did It Open Government?
Access to Information: Marginal

The government did not introduce legislative changes. However, the government did adopt the decree mandating the online publication of urban documentation. As a result, several municipalities published geo-information portals with exhaustive and visualized information. The publishing of the

cadastre registry online constitutes a big step forward. However, this progress has led to marginal changes in improving access to information on urban planning.

Carried Forward?

When this report was written, the government had not adopted a new action plan. The government could clearly identify how local governments will be monitored and specify the functionality of the digital cadastre system. More urban and rural communities should introduce geo-information portals with urban planning information.

[1] "The Draft Law on Amendments to Some Laws of Ukraine on Improving Urban Development," #4585, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=58971.

[2] "The Draft Law on Amendments to the Law of Ukraine 'On the Regulation of Urban Development Activities,'" #6403, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=61676.

[3] "Cabinet of Ministers of Ukraine. The Regulation on 24 May 2017 #354, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/250014978.

[4] "Cabinet of Ministers of Ukraine. The Regulation on 25 May 2017 #559, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/244303939.

[5] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[6] "The Draft Law on Amendments to Some Laws of Ukraine on Improving Urban Development," #4585.

[7] "The Draft Law on Amendments to the Law of Ukraine 'On the Regulation of Urban Development Activities,'" #6403.

[8] Serhiy Bilous (Ministry of Regional Development), email exchange with IRM researcher, 18 September 2018.

[9] Volodymyr Tarnay (Eidos), email exchange with IRM researcher, 24 October 2018.

[10] "Maino," GIS, https://gis.kievcity.gov.ua/map/park#map=14//50.44381368314857//30.53812980651856&&layer=9635591070826271-v:1|op:1.

[11] Lviv Map, Geoportal of Open Data of Lviv City Council, https://map.city-adm.lviv.ua/map/main#map=12//49.83720745438341//24.034996032714847&&layer=9635585433681688-1,100//12727358008557405-0,100//12721097171418162-1,100.

[12] Master Plan Rivne, Geoportal of Open Data of the Department of Urban Development and Architecture of the Executive Committee of the Rivne City Council, http://geo.rv.ua/ua/map/urban-plan#map=12//50.6191843//26.2302382&&layer=1664656129424098568-1,100//1758623072589448913-1,100.

[13] Volodymyr Tarnay (Eidos), interview with IRM researcher, 14 August 2018.

[14] "Open Budget," http://www.openbudget.in.ua/.

[15] Volodymyr Tarnay (Eidos), interview with IRM researcher, 14 August 2018.

[16] "City Budget Map," Drohobych City Council, http://drohobych-rada.gov.ua/informatsiya-vykonavchyh-organiv/byudzhetna-karta-mista/.

[17] "Budget on the Map," Uzhgorod City Council, http://rada-uzhgorod.gov.ua/byudzhet-na-mapi/.

[18] "Open Budget," Dnipropetrivsk Oblast Administration, http://openbudget.dp.gov.ua/.

[19] Serhiy Bilous (Ministry of Regional Development), email exchange with IRM researcher, 18 September 2018.

[20] Ibid.

[21] "Apache2 Ubuntu" Default Page, accessed 18 September 2018, http://www.pmap.minregion.gov.ua/.

[22] "The Public Cadastre Map of Ukraine," accessed 17 September 2018, http://map.land.gov.ua/.

5. Improve the ultimate beneficial owners verification system

Commitment Text:

Improvement of the mechanism for verifying information about ultimate beneficial owners.

Expected results: Implementation of mechanisms to search and display the relations between legal entities and their founders (participants), ultimate beneficial owners (controllers), including ultimate beneficial owners (controllers) of the founder, and heads of legal entities by updating the software for the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups.

Responsible Institution: Ministry of Justice.

Supporting Institution: Transparency International Ukraine non-governmental organization.

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
5. Ultimate beneficial owners verification system				✔	✔			✔				✔		✔ / ✔				✔			

Commitment Aim:

This commitment aims to improve the mechanism for verifying information about ultimate beneficial owners of companies. More specifically, this commitment would update the software for the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups (hereinafter the United State Register). Doing so would enable better search functions and display the relations among legal entities and their founders (participants), ultimate beneficial owners (controllers)—including ultimate beneficial owners (controllers) of the founder—and heads of legal entities.

Status
Midterm: Limited

On 20 September 2017 the Ministry of Justice issued decree #2941/5. The decree expanded the type of information on ultimate beneficiary owners that was mandatory for submission and publication. Such information included not only the personal name, family name, and patronymic of the ultimate beneficiary owner, but also the citizenship and the residential address.[1] Moreover, to comply with global open data standards, on 18 May 2017, the government adopted regulation #339.[2] This regulation authorizes the transfer of information on beneficial owners to the Global Beneficial Ownership Registry and publication of this information for the general public in an open data format.[3,4] However, the government did not complete the transfer of the United State Register. The Ministry of Justice had developed draft technical specifications for transferring the data to the global registry and was planning to develop the respective transferring algorithm. As of August 2017, the

Ministry of Justice was still updating the software that would help distinguish the information on a founder from the information on a beneficial owner of a legal entity in the United State Register. For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Limited

The Ministry of Justice reported that it has been working on updating the software. It also planned to introduce mechanisms to search and display the relations among legal entities and their founders (participants), ultimate beneficial owners (controllers)—including ultimate beneficial owners (controllers) of the founder—and heads of legal entities in the new release of the United State Register.[6] According to a representative of the International Renaissance Foundation, a multi-stakeholder group met only once, without any tangible effect.[7] Both the government and civil society note concerns regarding the quality and reliability of the data.[8]

The Ministry of Justice noted that there is no world best practice on verifying information on ultimate beneficial owners. Therefore, when the ministry does develop this verification, it will be an innovation.[9] A civil society expert confirmed that nowhere in the world does there exist a good model of such verification. In this expert's opinion, only the National Bank can collect up-to-date information and introduce sanctions against those who provide false information. Those sanctions include withdrawing their licenses to conduct banking activities.[10] The Ministry of Justice was finalizing a draft law on the prevention of money laundering, which should improve the mechanism for verification of information about ultimate beneficial owners.[11] Finally, on 29 August 2018 the Ministry of Justice issued decree #2824/5. The decree requires companies to update information about their ultimate beneficial owners every time they make a change to their legal status. Such changes, however, do not include the dissolution of a legal entity.[12] While this marks some progress in disclosing more data on beneficial ownership, there have not been any major mechanisms implemented to verify the data.

Did It Open Government?
Access to Information: Did Not Change

Despite some recent legislative changes, the structure of information in the register remains the same. Also, the government did not introduce an algorithm to search and display relations between ultimate beneficial owners. As such, there have been no improvements to access to information.

Carried Forward?

When this report was written, the government had not made the fourth action plan of Ukraine available. Thus, it is not clear if the government carried this commitment forward. Given the importance of this commitment, the IRM researcher encourages the government to continue efforts to fully implement it.

[1] "The Decree of the Ministry of Justice of Ukraine #2941/5," the Verkhovna Rada of Ukraine: The Official Web-portal, http://zakon.rada.gov.ua/laws/show/v2941323-17.
[2] "The Regulation of the Cabinet of Ministers of Ukraine on 18 May 2017 #339," Legislation of Ukraine, the Verkhovna Rada of Ukraine: The Official Web-Portal, http://zakon2.rada.gov.ua/laws/show/339-2017-%D0%BF/paran2#n2.
[3] "Ukraine Has Disclosed Information on Beneficial Owners in Open Data Format," Transparency International Ukraine, https://ti-ukraine.org/en/news/ukraine-has-disclosed-information-on-the-beneficial-owners-in-the-open-data-format/.
[4] "The Unified State Register of Legal Entities, Individual Entrepreneurs, and Community Groups," Data.gov.ua, No longer accessible as of February 13, 2019 http://data.gov.ua/passport/73cfe78e-89ef-4f06-b3ab-eb5f16aea237
[5] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
[6] Natalia Bernatska (Ministry of Justice of Ukraine), email exchange with IRM researcher, 14 September 2018.
[7] Oleksii Orlovskyi (International Renaissance Foundation), interview with IRM researcher, 4 August 2018.
[8] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 16 August 2018.
Natalia Bernatska (Ministry of Justice of Ukraine), email exchange with IRM researcher, 14 September 2018.
[9] Ibid.
[10] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 16 August 2018.
[11] Natalia Bernatska (Ministry of Justice of Ukraine), email exchange with IRM researcher, 14 September 2018.

[12] "The Decree of the Ministry of Justice of Ukraine #2824/5," Liga Zakon, http://search.ligazakon.ua/l_doc2.nsf/link1/RE32430.html.

6. Introduce the Construction Sector Transparency Initiative standards

Commitment 6. Introduce the Construction Sector Transparency Initiative standards

Commitment Text:

Introduction of the Construction Sector Transparency Initiative (CoST) international standards in order to ensure the accountability of procurement organizations and open access to information during publically funded construction work.

Expected results: Implementation of four pilot projects by the Construction Sector Transparency Initiative (CoST) regarding the disclosure of data on construction sites, major renovations and road infrastructure reconstruction, and the publication of reports on the data by a group of independent experts (first half of the year 2017). Adding of other construction sites using public funds to the standards for information disclosure of the Construction Sector Transparency Initiative (CoST) (March 2017). After the successful implementation of the four pilot projects of the Construction Sector Transparency Initiative (CoST), filing of proposals on the required amendments to regulations aimed at enhancing the efficient of use of public funds by applying the information disclosure standards of the Construction Sector Transparency Initiative (CoST) (second half of 2017). Approval of a mechanism to apply the standards of the Construction Sector Transparency Initiative (CoST) at the level of by-laws in order to ensure transparency of the use of public funds during the construction of infrastructure and to improve the accountability of procurement organizations (December 2017).

Responsible Institutions: Ministry of Infrastructure, Ministry of Regional Development, Ministry of Economic Development, Ministry of Finance, Ukraine State Roadway Agency (Ukravtodor).

Supporting Institutions: Transparency International Ukraine and Eidos Center for Political Studies and Analysis non-governmental organizations, Advisory Steering Group of the Construction Sector Transparency Initiative (CoST), other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion				Did It Open Government?				
													Not Started	Limited	Midterm / Substantial	End of Term / Completed					
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
6. Construction Sector Transparency Initiative standards				✔	✔						✔				✔	✔			✔		

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Commitment Aim:

The commitment intends to introduce the Construction Sector Transparency Initiative (CoST) international standards. The commitment aims to open access to information about publicly funded construction work. It entails the implementation of four pilot projects by CoST standards and the publication of reports by independent experts. It would add CoST standards to other construction sites that use public funds. The commitment also requires the filing of proposals on the required amendments to regulations introducing CoST standards. In addition, the commitment involves approval of a mechanism to apply CoST standards at the level of government decrees.

Status
Midterm: Substantial

During the first year of the action plan, this commitment demonstrated substantial progress. Construction Sector Transparency Initiative (CoST) standards have been implemented in the four pilot infrastructure projects.[1] Independent experts wrote CoST reports on these pilot projects, and the government has made them available online.[2] In December 2016, the Ministry of Infrastructure planned for four additional pilot projects.[3] CoST Ukraine drafted recommendations to amend government regulations.[4] However, by the end of midterm, these bylaws had not been adopted. For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Complete

During the second year, the government completed implementation of the commitment. Construction Sectory Transparency Initiative (CoST) Ukraine launched an online portal.[6] The portal provides CoST standards information about projects of three state companies and three local authorities. The state companies are Kyiv road maintenance company Kyivavtodor,[7] nationwide road maintenance company Ukravtodor,[8] and electricity infrastructure maintenance company Ukrenergo.[9] The local authorities are Lviv Oblast State Administration, Sumy Oblast State Administration, and Ternopil Oblast State Administration. The portal discloses information about 3,331 construction projects worth over UAH 46 billion in public funds. The portal presents information in map and table formats.[10]

A CoST Ukraine representative noted an exemplary 93 percent disclosure rate by Ukrenergo.[11] However, a civil society expert from Transparency International Ukraine noted a low disclosure rate by Ukravtodor.[12] Relatedly, the CoST portal listed eight projects financed by international financial institutions (IFIs) during 2016–2018.[13] However, among them, the project Go Highway, financed by IFIs, was not listed.[14] The CoST Ukraine representative confirmed a lack of information about IFI-supported Ukravtodor projects but emphasized the transparency regarding the Ukravtodor projects that utilize public funds.[15]

In the legislative domain, on 20 December 2017 the Cabinet of Ministers issued decree #1100.[16] The decree introduced amendments to regulation #835[17] on mandatory open datasets. It obligated Ukravtodor to publish data on construction, reconstruction, and the repair of public automobile roads of state significance (public roads of regional, national, and international scale) according to CoST standards. Consequently, CoST standards have been legally institutionalized. In addition, the government mandated the central government agency responsible for road construction policy at the state level to disclose extensive information on the use of public funds.

The government completed implementation of this commitment. The government implemented four planned pilot projects and four additional pilot projects. It published two expert reports, and it also filed and adopted legal amendments introducing CoST standards as mandatory for Ukravtodor.

Did It Open Government?
Access to Information: Marginal

The government introduced Construction Sector Transparency Initiative (CoST) transparency standards as mandatory for Ukravtodor and several other state companies. Local authorities proactively joined the initiative. These actions constituted a step forward in opening the government. However, stakeholders raised several concerns. In particular, despite the genuine political support from the minister of infrastructure and Ukravtodor's proclaimed commitment to openness, the latter has gradually become more closed and provided contradictory and unverifiable data.[18] (Ukravtodor reports directly to the Cabinet of Ministers and therefore is accountable only to the Cabinet.) According to the representative of CoST Ukraine, despite government efforts and international financial institutions (IFIs) support, after 2016, Ukravtodor refused to provide access to documents about IFI-funded road construction and repair.[19] The CoST Ukraine representative concluded that UAH 2 billion of public funds taken as a loan by the Ukraine government from IFO are spent in a nontransparent way.[20] However, Ukravtodor is publishing the protocols of its Technical Council.[21] These disclosures provide technical, not financial, information.

Carried Forward?

To scale up the successful pilot cases, Construction Sector Transparency Initiative (CoST) Ukraine and other civil society groups should combine advocacy efforts. Together, they should work to convince the government to further introduce advanced CoST standards into Ukrainian legislation for all related national and local authorities. The government could introduce monitoring and assurance mechanisms to ensure the accuracy of the published information. Comprehensive reform of construction management and monitoring of infrastructure need to be introduced. This could be done both through legal acts and an integrated information technology product that can enable better tracking of infrastructure projects. The data on the CoST portal needs to be published in the format that allows easy cross checking with the data on public procurement and public spending available on ProZorro and E-data portals respectively.

1 "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.
2 "Pilot Projects," CoST Ukraine, https://costukraine.org/en/projects/.
3 "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018."
4 "CoST Recommendations," CoST Ukraine, https://costukraine.org/projects/rekomendatsiyi-cost/.
5 "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
6 "CoST Portal: Transparent Infrastructure," CoST Ukraine, http://portal.costukraine.org/.
7 Kyivavtodor, http://kyivavtodor.kievcity.gov.ua/content/pro-nas.html.
8 Ukravtodor, http://ukravtodor.gov.ua/ukravtodor/pro_nas.html.
9 Ukrenergo, https://ua.energy/about/.
10 "CoST Portal: Transparent Infrastructure," CoST Ukraine, accessed 20 September 2018, http://portal.costukraine.org/.
11 Natalia Forsiuk (CoST Ukraine), interview with IRM researcher, 23 August 2018.
12 Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 6 August 2018.
13 "IFIs projects," CoST Ukraine, http://portal.costukraine.org/proekti/ukravtodor/proekti-mfo/.
14 "Slavomir Novak: 'The Initiated Project Go Highway Is the Foundation for Integration between Ukraine and EU,'" Ukravtodor, http://ukravtodor.gov.ua/press/news/slavomir_novak_initsiiovanyi_proekt_go_highway_ye_osnovoiu_intehratsiinykh_protsesiv_mizh_ukrainoiu_ta_yes.html.
15 Natalia Forsiuk (CoST Ukraine), interview with IRM researcher, 23 August 2018.
16 "Cabinet of Ministers of Ukraine. The Regulation on 20 December 2017 #1100, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/pro-vnesennya-zmin-do-polozhen.
17 "Cabinet of Ministers of Ukraine. The Decree on 21 October 2015 #835, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/248573101.
18 Natalia Forsiuk (CoST Ukraine), interview with IRM researcher, 23 August 2018.
19 Natalia Forsiuk (CoST Ukraine), email exchange with IRM researcher, 18 October 2018.
20 Ibid.
21 "Protocols 2018," Ukravtodor, http://ukravtodor.gov.ua/4489/tekhnichna_rada/protokoly_2018_zasidannia_tekhnichnoi_rady_derzhavnoho_ahentstva_avtomobilnykh_dorih_ukrainy.html.

7. Initiate an online "Transparent budget" system

Commitment Text:

Implementation of the first stage in the development of the integrated "Transparent budget" information and analysis system.

Expected results: Development of technical specifications for the development of the "Transparent budget" system (June 2017). Development and trial operation of a "Budget for the citizens" subsystem (December 2017).

Responsible Institution: Ministry of Finance.

Supporting Institutions: Eidos Center for Political Studies and Analysis non-governmental organization, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm / End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
7. Online "Transparent budget" system		✔			✔			✔		✔				✔		✔			✔		

Commitment Aim:

This commitment aims to implement the first stage in the development of the integrated Transparent Budget information and analysis system. The government planned to elaborate technical specifications for the development of the system and launch a trial operation of the Budget for the Citizens subsystem.

Status

Midterm: Limited

During the first year of the action plan, progress remained limited. Major challenges involved the allocation of funds for information technology (IT) development and a change in leadership in the Ministry of Finance. By midterm, technical specifications of the system had been defined and IT development had started, but the software had not been released. As the project was costly, the Ministry of Finance included additional funds in its section of the draft state budget for 2018. For more information, please see the 2016–2018 IRM midterm report.[1]

End of term: Complete

According to the acting minister of finance, the ministry allocated the funding for the software within the state budget for 2018.[2] This particular line of spending was not found in the law on state budget. However, the line of spending may have been hard to find because the government published the budget in an aggregated format.[3] On 19 July 2018 the multi-stakeholder working group #258 on the

module "Budget for the Citizens" met. The group concluded that due to the absence of a signed contract, it would postpone the developement and testing of the module until the second quarter of 2018.[4] The next meeting of the multi-stakeholder working group #258 took place on 30 August 2018. At that meeting, the Ministry of Finance presented current developments and discussed issues of functionality and design with participants.[5] On 17 September 2018 the acting minister of finance presented the "Budget for the Citizens" module.[6] It functions as a separate portal.[7] The module has a glossary on budgeting (as a form of civic education). It also presents monthly dynamics of the state budget in the following dimensions: the year 2018 or 2019; national, local, and total; plans, revenues, and spending; and program, economic, and functional classifications of spending. The spending information seems more detailed than the revenue information. However, the commitment did not specify the level of detail that should be included at the trial stage. Therefore, this commitment can be assessed as complete.

In addition, civil society launched a parallel project, Open Budget https://www.openbudget.in.ua/. A model portal of Dnipropetrovsk Oblast Administration visualizes the budget data on a map. The portal disaggregates data by spending program.[8] According to the Open Budget project manager, the government introduced the project in 40 cities. Open Budget could be seen as complimentary to the ministry's portal. The nongovernmental organization has prepared to incorporate the Open Budget module into the Transparent Budget system.[9]

Did It Open Government?
Access to Information: Marginal

Before the start of this commitment's implementation, local authorities did not publish all the existing budget in an open data format. They aggregated it at a very generic level and did not apply a standard format. The commitment intended to correct this practice by presenting the public budgetary information online. The launch of the Budget for the Citizens portal has increased the amount of information on the public budget that is available in an open data format. It details plans, revenue, and spending of national and local budgets with data aggregated at the level of information owners (such as ministries, government agencies, or local authorities). Nevertheless, the disclosure is still at aggregate level. Maximum openness could have been achieved at the level of individual transactions. This has already been done for spending, so it needs to be done for plans and revenues as well. As the data are too aggregated, the change in government practice on improving access to budget information has been marginal.

Carried Forward?
If the government carries the commitment forward in the next action plan, the IRM researcher recommends that the commitment outline how the monitoring function will be enabled and how regularly it will be updated. The Ministry of Finance could consider designing the public monitoring tool in a user-friendly way that focuses on visualization and analysis. The design could be modeled after the well-known DoZorro module,[10] used for the monitoring of online public procurement, or the .007 system,[11] which monitors public spending.

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[1] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
[2] Oksana Markarova (Ministry of Finance of Ukraine), interview with IRM researcher, 30 August 2018.
[3] "The Law of Ukraine on State Budget for 2018," #2246-VIII, the Verkhovna Rada of Ukraine: The Official Web-portal, http://zakon.rada.gov.ua/laws/show/2246-19.
[4] "The Protocol of Group #258 Meeting on 19 July 2018," Ministry of Finance of Ukraine, email exchange with IRM researcher, 1 September 2018.
[5] "The Group #258 Meeting on 30 August 2018," observation by IRM researcher, 30 August 2018.
[6] "The Ministry of Finance Presented the Open Data Project 'Budget for Citizens,'" Ukrinform, 17 September 2018, https://www.ukrinform.ua/rubric-economy/2539616-u-minfini-prezentuvali-proekt-vidkritih-danih-budzet-dla-gromadan.html.
[7] Open Budget, https://openbudget.gov.ua/.
[8] Open Budget of Dnipropetrovsk Oblast Administration, http://openbudget.dp.gov.ua/.
[9] Volodymyr Tarnay (Eidos), interview with IRM researcher, 14 August 2018.
[10] DoZorro, https://dozorro.org/.
[11] .007, https://www.007.org.ua/.

✪8. Ensure openness and transparency in public procurement

Commitment Text:

Provision of openness and transparency in public procurement.

Expected results: Publication of the application software interface of the public procurement electronic system in accordance with the international Open Contracting Data Standard (November 2016). Publication of the application software interface of the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups with disclosure of the owners and ultimate beneficiaries (February 2017). Establishment of a multilateral monitoring group aimed at ensuring the independent monitoring of public procurement (November 2016). Introduction of a public feedback system to improve the integrity of the system (February 2017). Functional compatibility between the data on public procurement and use of public funds with treasury data in order to increase the transparency of the use of public funds by providing a link between the planned budget and budgetary classification, the results of tenders, agreements, certificates of work performed under these agreements and transactions under agreements, in particular through the publication of a unique agreement ID (March 2017).

Responsible Institutions: Ministry of Economic Development, Ministry of Finance, Ministry of Justice, State Agency for E-governance, State Audit Service, National Police, Treasury.

Supporting Institutions: Transparency International Ukraine and Eidos Center for Political Studies and Analysis non-governmental organizations, Open Contracting Partnership Initiative, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
✪8. Openness and transparency in public procurement			✔		✔	✔		✔				✔			✔ (midterm) / ✔ (end of term)						✔

Editorial note: This commitment is clearly relevant to OGP values as written, has transformative potential impact, and is substantially or completely implemented and therefore qualifies as a starred commitment.

Commitment Aim:

This commiment aims to expand openness and transparency in public procurement. According to the Law on Public Procurement, an online public procurement system, ProZorro, should be used by all state bodies. Nevertheless, the system needed updating to ensure higher transparency and inclusion of tools for civil society monitoring. Therefore, the commitment envisioned four enhancements: (1) introduce the Open Contracting Data Standard, (2) require disclosing information about owners and

ultimate beneficiaries, (3) establish a multilateral monitoring group and (4) establish functional compatibility between a set of public registries.

Status
Midterm: Substantial

By midterm, this commitment had made substantial progress. The Open Contracting Data Standard (OCDS),[1] with an updated application programming interface, had been introduced. The public procurement interface with the OCDS was available online, as was the associated Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups of Ukraine.[2] In April 2017, the Ministry of Economic Development and Trade created the multilateral monitoring group. The group consisted of members of the civil service and civil society. The ministry authorized the group to discuss public feedback received on procurement and develop policies to improve monitoring and enforcement. The government activated the public feedback mechanism through the DoZorro portal. This feature included both public and professional analytical modules.[3] DoZorro automated statistical calculations and displayed statistics for all appeals. It also served as a platform for dialogue among all parties. The Ministry of Economic Development and Trade advocated the functional compatibility of all financial flows, including compatibility between ProZorro and the State Treasury. This functional compatibility was delayed because of the o lack of funding. For more information, please see the 2016–2018 IRM midterm report.[4]

End of term: Substantial

The second year witnessed further progress in implementing this commitment. According to the government representative, the Ministry of Economic Development and Trade introduced new procedures to ensure that the government publishes the data according to OCDS standards.[5] A civil society expert noted that the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups discloses data in .csv format for free and via API for a fee.[6] A civil society member said that the creation of the multilateral monitoring group in 2017 spurred the formation of several other working groups. These groups were driven by participating parties from the government and civil society and met several times in 2018.[7] DoZorro, which can be named a full-fledged monitoring online portal, grew to include an additional analytical module. This module specializes in the monitoring of prices of medical products.[8] As described by a civil society expert, their NGO further extended DoZorro to include more nongovernmental organizations and local authorities.[9] The government requires each procuring authority to monitor public feedback. On 21 December 2017 Parliament adopted amendment #2265-VIII to the Law on Public Procurement.[10] The amendment introduced mandatory automatic risk indicators in public procurement, which will strengthen monitoring opportunities. These risk indicators are designed to be regularly updated through machine learning.[11] Artificial intelligence will help the State Audit Service identify procurements with violations while using less resources, examining bigger quantities, and working faster.[12] However, the government did not establish functional compatibility between the data on public procurement and the use of public funds and Treasury data. According to a representative from Transparency International Ukraine, the government did not complete this task because of lack of openness and willingness to implement this initiative by the State Treasury.[13] Overall, the completion of four out of five objectives merits a rating of substantial progess for this commitment.

Did It Open Government?
Access to Information: Outstanding
Civic Participation: Outstanding

At the onset of the action plan, the government had already established the online procurement system, but it needed further enhancement. The commitment involved raising the transparency bar by publishing procurement data in the Open Contracting Data Standard. The commitment also entailed linking this data with public databases of ultimate beneficial owners and the State Treasury. It also mandated publishing a unique ID for each public procurement contract to allow better tracking and cross-checking of information. According to the Ministry of Economic Development and Trade, the amount of open data on public procurement has increased. In particular, ESCO contracts and

framework agreements started to be published.[14] An expert from Transparency International Ukraine stated that ProZorro established the best standard on open data procurement in the world. It publishes the structured data online, via datasets and API.[15] Outcomes include the following: The integration of the data with the Unified State Register of Legal Entities, Individual Entrepreneurs and Community Groups eliminated the requirement for companies to submit registration certificates. The integration also prevented fake companies from bidding in tenders.[16] The abundance of data initiated a burst of independent online monitoring initiatives. Already established were YouControl,[17] Opendatabot,[18] (which analyzed participants), E-data,[19] and .007[20] (which overviewed financial flows). The second year witnessed the emergence of Anti-Corruption Monitor[21] and Clarity Project[22] (which focused on monitoring purchases themselves). This emergence of subsequent civil society projects demonstrates an apparent multiplier effect of DoZorro. These achievements represent an outstanding opening in the area of access to information on procurement. They also represent an outstanding progress in civic participation to monitor public procurement.

For proper monitoring of procurement, this commitment entailed the creation of a public feedback mechanism for reporting procurement violations. It also called for the establishment of a multilateral monitoring group to discuss feedback and determine follow-up steps for relevant public bodies. By March 2018, DoZorro had been used by over 300,000 users (social activists, investigative journalists, researchers, big procuring entities, ministries, and regulatory and law enforcement authorities). Every month, 24 monitoring civil society organizations identify and submit complaints concerning violations in over 1,500 procurements.[23] To strengthen their organizational capacities, ProZorro and DoZorro created a strong regional network of nongovernmental organizations (NGOs) and held over 350 training seminars in 2016–2017 for these NGOs. Over 20,000 participants attended the seminars.[24] The abundance of data initiated a burst of independent online monitoring initiatives (mentioned above). A Ukrainian multi-stakeholder team even started developing systems similar to DoZorro in Moldova.[25] These actions represent an outstanding change in civic participation in public procurement policy.

Carried Forward?
When this report was written, the government had not published the next action plan. Thus, it is not clear if this commitment has been carried forward. Given the importance of procurement reform and the achievements the commitment has already made, the IRM researcher recommends the government continue working on enhancing the features of the relevant platforms. For example, the State Fiscal Service could collaborate with the Ministry of Economic Development and Trade on the integration of the indebtedness certificate into ProZorro. With this action, bidders will not need to upload the information already possessed by the government, implementing the "once only" principle. The Ministry of Economic Development and Trade could analyze risk statistics and regularly update the methodology of automatic risk indicators. The Ministry of Economic Development and Trade could also integrate ProZorro and DoZorro so that the platforms send feedback and reports on findings directly to enforcement agencies or oversight authorities online. Civil society organizations could work to develop an analytical module monitoring the full cycle of violations of procurement and control—from a reported violation to its investigation, lawsuit, court decision, and enforcement.

[1] Open Contracting Data Standard, http://standard.open-contracting.org/latest/en/.
[2] Open Procurement API, http://api-docs.openprocurement.org/uk_UA/latest/.
[3] DoZorro, https://dozorro.org/.
[4] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
[5] Maksym Nefyodov (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.
[6] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 6 August 2018.
[7] Ibid.
[8] "Monitoring of Prices on Medical Products," DoZorro, https://dozorro.org/medical_contracts.
[9] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 6 August 2018.

[10] "The Law of Ukraine on Amendments to the Law of Ukraine 'On Public Procurement' and Other Laws of Ukraine on Procurement Monitoring," #2265-VIII, the Verkhovna Rada of Ukraine: The Official Web-portal, http://zakon.rada.gov.ua/laws/show/2265-19.

[11] Maksym Nefyodov (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.

[12] "DoZorro Story," Transparency International Ukraine, 2018.

[13] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 6 August 2018.

[14] Maksym Nefyodov (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.

[15] Victor Nestulia (Transparency International Ukraine), interview with IRM researcher, 6 August 2018.

[16] Maksym Nefyodov (Ministry of Economic Development and Trade of Ukraine), interview with IRM researcher, 15 August 2018.

[17] YouControl, https://youcontrol.com.ua/en/.

[18] Opendatabot, https://opendatabot.com/.

[19] E-data, http://www.e-data.gov.ua/.

[20] .007, http://007.org.ua/.

[21] AKM, http://acm-ua.org/.

[22] Clarity Project, https://clarity-project.info/about.

[23] "DoZorro Story."

[24] Ibid

[25] Ibid

✿9. Implement the Extractive Industries Transparency Initiative

Commitment Text:

Implementation in Ukraine of the Extractive Industries Transparency Initiative

Expected results: Support in the Verkhovna Rada of Ukraine for the draft Law of Ukraine "On the disclosure of information in extractive industries" (until adoption). Publication of reports in Ukrainian and English based on the standards of the Extractive Industries Transparency Initiative (December 2016, December 2017).

Responsible institutions: Ministry of Coal and Energy, Ministry of Economic Development, Ministry of Finance, Ministry of the Environment, State Geology and Subsoil Resources Service.

Supporting institutions: International Renaissance Foundation, German Corporation for International Cooperation (GIZ), American Chamber of Commerce in Ukraine, non-governmental organizations Dixie Group, Analytical Center for Regional Cooperation, Energy Transparency Association, the international initiative Publish What You Pay, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
9. Extractive Industries Transparency Initiative			✔		✔							✔			✔ /	✔					✔

Editorial note: This commitment is clearly relevant to OGP values as written, has transformative potential impact, and is substantially or completely implemented and therefore qualifies as a starred commitment.

Commitment Aim:

This commitment aims to implement the Extractive Industries Transparency Initiative (EITI) in Ukraine as a continuation of commitments in two previous action plans. Ukraine became an EITI candidate country in 2013, published its first EITI report in 2015, and has passed some legislative amendments to introduce EITI standards. However, the government need to put forth additional efforts to pass EITI assessment, publish annual reports, and introduce a new law that would adopt EITI standards to the fullest extent. This commitment aims to win support in the Verkhovna Rada for the law and publish the EITI reports.

Status
Midterm: Substantial

By midterm, the multi-stakeholder group, including Extractive Industries Transparency Initiative (EITI) Ukraine, had helped to prepare the draft law. Parliament first debated it in February 2017, but it did not pass. The second updated draft law, under new registration number #6229, was submitted on 23 March 2017.[1] The parliamentary committee recommended it for voting, but the draft law was not included in the parliamentary agenda. The second EITI report was published in February 2017. This report, written by an independent organization (the so called "administrator"), covered two calendar years (2014 and 2015). The report included additional extractive industries not illuminated in previous reports. Its scope covered 97 extractive companies that together paid more than 99 percent of the extractive industries tax revenues to the state budget. Overall, 51 of 97 companies responded to a request for information during the preparing of the report. After the Russian annexation of the Crimean Peninsula and the eruption of armed conflict in the Donetsk and Luhansk regions, the multi-stakeholder group proposed that the EITI board adapt implementation of EITI standards for the 2014 and 2015 fiscal years. In October 2016, the EITI board approved the group's request pertaining to the 2014–2015 EITI report. To cover the information gaps and respond to an EITI board request, the State Fiscal Service of Ukraine provided full unilateral disclosure of total income. This disclosure included information from nonreporting companies and data for each material revenue stream. For more information, please see the 2016–2018 IRM midterm report.[2]

End of term: Complete

The draft law #6229, On Ensuring Transparency in Extractive Industries,[3] underwent intensive debate. After several failed attempts of a coalition of civil society organizations and members of Parliament to include it in the parliamentary agenda in 2017, on 1 March 2018 the number of supportive Parliament votes was sufficient for Parliament to approve the law in general in the first hearing. On 5 June 2018 the parliamentary committee sent Parliament the list of suggested edits. However, on 3 July 2018 the draft law did not receive the required number of votes for a final adoption. Parliament sent it back to the parliamentary committee for review. A civil society activist conducting the advocacy of the Extractive Industries Transparency Initiative (EITI) believed that previous votes failed because members of Parliament affiliated with certain companies avoided extra transparency for those companies. This activist predicted that other members of Parliament without a conflict of interest would contribute to successful voting.[4] Indeed, on 18 September 2018 Parliament adopted the law. The law was passed due to joint efforts of a wide coalition of civil society organizations, business associations, multilateral organizations, the EITI Secretariat, the Cabinet of Ministers, members of Parliament, and the speaker of Parliament.[5] Civil society organizations in the coalition included DiXi Group and International Renaissance Foundation. Business coalitions involved included the Association of Gas Extracting Companies and the American Chamber of Commerce. Government and multilateral organizations that helped the process included the European Commission, the European Bank for Reconstructions and Development, and the US Agency of International Development. Also, the coalition managed to reach an effective compromise with stakeholders (business, civil society, and the government agencies)[6] about the provisions of the law.[7] The law requires private and state companies conducting activities in extracting industries, recipients of revenues, and related ministries to disclose information on payments and revenues in reports and on websites in a publicly accessible, open data format. It also established the procedures for the multi-stakeholder group and for writing and publishing EITI reports by a specially selected, independent administrator. The law introduced consequences for violations of the law (mostly fines). On 6 June 2018 the third EITI report (on 2016) was published. [8,9] It covered legal, corporate, and financial information on the coal, oil, natural gas, iron ore, titanium ore, manganese ore, fireclays, high-melting clays, and quartz sand industries.

Did It Open Government?
Access to Information: Outstanding

The government intended for this commitment to introduce a comprehensive framework for transparency in the sector. The three Extractive Industries Transparency Initiative (EITI) reports provide an immense amount of financial information about extractive industries in a detailed format.[10] According to the civil society actor promoting transparency policies on behalf of the DiXi Group, the

reports constitute the only source of aggregated and verified information about the sector. Diverse stakeholders submit information, and an independent auditor verifies it.[11] The representative of the EITI Secretariat confirmed this assessment of the special standing of EITI reports. The representative admitted that the reports constitute the most extensive multidimensional source of data in the field.[12]

Compared to the first report, the second one expanded the scope of information disclosed by opening up previously closed information on iron ore, titanium ore, and manganese ore. The third report disclosed information on fireclays, high-melting clays, and quartz sand. In addition to the EITI Ukraine reports, the Ministry of Coal and Energy published EITI reports and source datasets in an open data format[13] in the government open data portal.[14] Moreover, the Ministry of Coal and Energy, the State Geology and Subsoil Resources Service, and State Fiscal Service voluntarily disclosed additional information.[15] The government has made datasets for all three reports available in .xls and .csv formats. One serious limitation involves the temporarily occupied territories, for which around 95 percent of the information required for disclosure is available.[16] On 29 June 2018 global EITI completed Ukraine's validation against the standard, which commenced on 1 July 2017. EITI acknowledged that EITI Ukraine made meaningful progress in meeting the EITI Standard.[17] In particular, the EITI praised the transparency of beneficial ownership and civil society engagement, noting that it went beyond expectations. Finally, law #6229, On Ensuring Transparency in Extractive Industries,[18] made the disclosure of information according to EITI standards mandatory and introduced accountability mechanisms. This progress can be acknowledged as an outstanding advance in access to information on extractive industries in Ukraine.

Carried Forward?

The IRM researcher recommends developing and launching a digital online platform for reporting and publishing information according to EITI standards and information about payments to local budgets.

[1] "The Draft Law on Ensuring Transparency in Extracting Industries," #6229, the Verkhovna Rada of Ukraine, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=61409.
[2] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
[3] "The Draft Law on Ensuring Transparency in Extracting Industries," #6229.
[4] Olena Pavlenko (DiXi Group), interview with IRM researcher, 29 August 2018.
[5] Olena Pavlenko (DiXi Group), email exchange with IRM researcher, 18 October 2018.
[6] Dina Narezhneva (EITI Ukraine), email exchange with IRM researcher, 18 October 2018.
[7] Oleksii Orlovskyi (International Renaissance Foundation), email exchange with IRM researcher, 18 October 2018.
[8] "Third UAEITI Report Published," UAEITI, http://eiti.org.ua/en/2018/06/third-uaeiti-report-published/.
[9] "Library," UAEITI, http://eiti.org.ua/en/library/.
[10] "Library," UAEITI, http://eiti.org.ua/en/library/.
[11] Olena Pavlenko (DiXi Group), interview with IRM researcher, 29 August 2018.
[12] Dina Narezhneva (EITI Ukraine), email exchange with IRM researcher, 18 October 2018.
[13] "Information Contained in EITI Reports is Available in the Format of Open Data," DiXi Group, http://dixigroup.org/news/dani-zvitiv-ipvg-dostupni-u-formati-open-data/.
[14] "National Ukraine EITI Report," Open Data Portal, https://data.gov.ua/dataset/da1849bf-140f-4161-a71f-2f6a904fffb5.
[15] Dina Narezhneva (EITI Ukraine), interview with IRM researcher, 9 August 2018.
[16] Oleksii Orlovskyi (International Renaissance Foundation), interview with IRM researcher, 4 August 2018.
[17] "EITI Ukraine," EITI, https://eiti.org/ukraine.
[18] "The Draft Law on Ensuring Transparency in Extracting Industries," #6229.

10. Introduce public monitoring of the state of the environment

Commitment Text:

Introduction of public monitoring of the state of the environment.

Expected results: Creation of an open list of the largest polluters in the regions as part of the development of a national automated environmental data system. Creation of an electronic system for monitoring radiation safety and environmental threats.

Responsible institutions: Ministry of the Environment, State Agency for Administration of the Exclusion Zone, Regional and Kyiv Municipal State administrations.

Supporting institutions: Civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
10. Public monitoring of the state of the environment			✔		✔						✔			✔ / ✔				✔			

Commitment Aim:

This commitment aims to introduce a public monitoring system of the state of the environment in Ukraine. It would provide a transparent mechanism to monitor the enviornment and keep residents informed about enivronment issues and dangers in their regions. This commitment seeks to create an open list of the largest polluters in the regions as part of the development of a national automated environmental data system. It would also create an electronic system for monitoring radiation safety and environmental threats.

Status

Midterm: Limited

By the end of the first year of the action plan, the government delivered the first expected result. On 4 July 2017, the Ministry of Ecology and Natural Resources published a list of the top 100 national polluters on its website.[1] The list identified polluters based on one of three categories of pollution: water, air, and industrial waste. Experts from environmental civil society groups criticized the methodology used to acquire the data, as well as the quality and timeliness of the data. Authorities agreed that the information on ecological pollution remained incomplete. The data portal and monitoring system were at the stage of the basic conceptual design. The three published, publicly accessible environmental datasets[2,3,4] present the above-mentioned list in an open data (.xls and .csv)

format. However, the government has not integrated the datasets into a single, automatic system. For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Limited

Although the ministry announced that it updates the datasets annually,[6] as of the end of September 2018, the latest available data was from July 2017. Relatedly, the ministry noted insufficient information and communication technology infrastructure, the lack of institutional capacity, and inefficient coordination of activities related to collecting and structuring ecological information, especially in digital format. The ministry admitted that its methodology was imperfect, as each regional authority submitted the top five polluters in their regions. However, some regions contain more dangerous enterprises than others. The ministry recognized that, instead, the top 100 polluters should be identified nationwide.[7] Considering this, in 2018, the Ministry of Ecology and Natural Resources (MENR) developed a new methodology for the evaluation of ecological threats. It also developed an integral indicator of negative effect on environment. This indicator includes (1) a potential ecological threat of a facility; (2) a facility's actual negative impact on environment (in the form of emissions, discharges, waste generation, and waste management); and (3) the current pollution rate of territories (including soils, water surface and underground objects, and the level of damage to the local biosystem).[8] To apply this methodology, in 2018, MENR delegated the monitoring of polluters to a research institution implementing a research project for public funds.[9]

On 28 March 2018 the Cabinet of Ministers adopted decree #244-p. This decree constituted the government's action plan for 2018.[10] It included the development of a nationwide automated system, Open Environment. The government action plan entails drafting and adopting the relevant concept paper, action plan, and terms of reference for Open Environment. It also calls for a trial operation of several modules of Open Environment by the end of 2018. The government planned for Open Environment to form a digital geo-information infrastructure for the protection of environment and a centralized electronic system for managing ecological information. MENR informed the IRM researcher that it has developed the concept paper on the automated system Open Environment. On 23 July 2018 it received legal approval from the Ministry of Justice, and on 7 September 2018 it submitted the paper to the Cabinet of Ministers for review and adoption.[11] An expert on ecological transparency from civil society confirmed that the government developed the concept paper and that it conforms to European Union regulations.[12]

Various agencies and volunteer projects conduct the monitoring. For instance, on 6 July 2018 the State Agency of Water Resources presented a jointly developed interactive map of river pollution in Ukraine.[13] The ministry envisions this tool as becoming part of the future Open Environment system. This Clear Water map visualizes the pollution of the six biggest rivers in Ukraine to a high precision.[14] An ecologist and civic activist explained that the map demonstrates water pollution by 16 parameters, according to data from 445 locations.[15] The State Agency for Administration of the Exclusion Zone conducts air pollution monitoring exclusively in the contaminated zone.[16]

Did It Open Government?
Access to Information: Did Not Change

At the beginning of the action plan, despite the efforts of the Ministry of Ecology and Natural Resources, there existed no transparent mechanism for monitoring the environment in Ukraine. The available information was limited or outdated. For example, publicly accessible pollution data was significantly out of date. Therefore, the government took on the commitment to introduce public monitoring mechanisms. Specifically, it sought to publish an online, open list of the largest polluting industries by region and to develop a national, automated data system to track environmental indicators. The government designed this system to be paired with an electronic system to monitor spikes in unsafe radiation, as well as other environmental threats. The Ministry of Ecology and Natural Resources published the top 100 polluters (up top five polluters in each monitored oblast) and drafted a concept paper of the automated system Open Environment. However, the government has published the lists of top 100 polluters in previous years,[17,18,19] and the concept paper has not

been adopted by the government yet. Thus, there has been no significant change in government policy on the issue.

Carried Forward?

Given the relevance of this topic in Ukraine, the Ministry of Ecology and Natural Resources should develop and launch the automated system Open Environment. It should present detailed, disaggregated information on air, water, and industrial waste pollution, and radiation contamination in an open data format, with visualization.

[1] "Information about Objects, Which Are the Biggest Atmosphere Polluters," Ministry of Ecology and Natural Resources of Ukraine, https://menr.gov.ua/files/docs/news/TOP_100.pdf.

[2] "The List of the Biggest Environmental Polluters in Ukraine—Considering Air Pollution," Ministry of Ecology and Natural Resources, 13 July 2017, https://menr.gov.ua/news/31570.html.

[3] "The List of the Biggest Environmental Polluters in Ukraine—Considering Water Pollution," Ministry of Ecology and Natural Resources, 14 July 2017, https://menr.gov.ua/news/31574.html.

[4] "The List of the Biggest Environmental Polluters in Ukraine—Considering Industrial Waste," Ministry of Ecology and Natural Resources, 14 July 2017, https://menr.gov.ua/news/31575.html.

[5] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[6] "Information about Objects, Which Are the Biggest Atmosphere Polluters," Ministry of Ecology and Natural Resources of Ukraine, http://data.gov.ua/passport/b348d687-40d6-4039-b346-171096fc6101.

[7] Dmytro Bulyka (Ministry of Ecology of Ukraine), email exchange with IRM researcher, 14 September 2018.

[8] Ibid.

[9] Ibid.

[10] "Cabinet of Ministers of Ukraine. The Decree on 28 March 2018 #244-p, The Government Portal," Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/npas/pro-zatverdzhennya-planu-prioritetnih-dij-uryadu-na-2018-rik.

[11] Dmytro Bulyka (Ministry of Ecology of Ukraine), email exchange with IRM researcher, 14 September 2018.

[12] Antonina Yerysheva (Civic Energy), interview with IRM researcher, 16 August 2018.

[13] "'Clear Water': The Online Map of River Pollution in Ukraine Was Presented," the Government Portal, Unified Web-Portal of Executive Authorities of Ukraine, https://www.kmu.gov.ua/ua/news/chista-voda-prezentovano-onlajn-kartu-zabrudnenosti-richok-v-ukrayini.

[14] Clear Water, http://texty.org.ua/water/.

[15] Antonina Yerysheva (Civic Energy), interview with IRM researcher, 16 August 2018.

[16] Ibid.

[17] "Top Environmental Polluters in Ukraine Have Been Announced," Ukrainian Pravda, 21 July 2006, https://www.pravda.com.ua/articles/2006/07/21/3133304/.

[18] "Top Environmental Polluters in Dnipropetrovsk Region in 2007," Ukrrudprom, 15 February 2008, http://www.ukrrudprom.com/digest/dfdsaqw150208.html.

[19] "Top Environmental Polluters Need to Be Known," Sivershchyna, 7 February 2011, https://siver.com.ua/news/najbilshi_nashi_zabrudnjuvachi_jikh_varto_znati/2011-02-07-7066.

11. Create a "Community policing" system

Commitment Text:

Creation of a "Community policing" system

Expected results: Training of patrol policemen, district policemen, juvenile prevention inspectors and inspectors of patrol police response groups in the principles of community policing (December 2017). Holding of information campaigns on matters related to community policing among the populace (June 2018). Establishment of citizen advisory groups in urban settlements (June 2018). Creation and launch of online resources for police and community support and cooperation (2017). Implementation of the "School and Police" project (June 2018).

Responsible institutions: National Police, Ministry of Internal Affairs, Ministry of Education and Science, Regional and Kyiv Municipal State administrations.

Supporting institutions: European Union Advisory Mission in Ukraine (EUAM), IREX International organization, Dream Kyiv non-governmental organization, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion		Midterm / End of Term		Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
11. "Community policing" system			✔		✔	✔					✔				✔ (midterm) / ✔ (end of term)					✔	

Commitment Aim:

The commitment aims to create a community policing system. The commitment would reform the police force. It seeks to promote community policing and train police officers in the principles of community policing. It would conduct information campaigns on community policing and establish citizen advisory groups. The commitment would also create and launch online resources for police and community support and cooperation, and implement a School and Police project.

Status
Midterm: Substantial

According to the government's self-assessment report, the police completed an unspecified number of trainings for police in six regions. The police were still in the process of conducting trainings in three other regions and had educated 614 police officers as trainers in community policing.[1] No significant media campaign had taken place at the midterm. Instead, the National Police had focused on organizing meetings between the police and both civil society representatives and the broader public. At midterm, 1,261 meetings had taken place. The government's self-assessment report

indicated that within the time frame of this commitment, the police had conducted as many as 9,523 instructional classes in Ukrainian high schools.[2] The School Police Officer module involved a patrol officer visiting a school and scheduling conversations with students.[3] According to the government's self-assessment report, a majority of parents and children considered the crime prevention in schools program positive. To provide more online resources for the police and the public, the National Police launched a small pilot program in Kyiv collecting public feedback using a Facebook page called "Secure Community."[4] The page received 397 appeals from the public to address a variety of issues regarding local policing. Yet the National Police have not begun to form citizen advisory groups. Overall, by midterm, the commitment had made substantial progress. For more information, please see the 2016–2018 IRM midterm report.[5]

End of term: Substantial

By the end of the action plan, the government had substantially completed the commitment. The National Police continued conducting more trainings for police, launched new information campaigns, and continued updating online resources for police and community support and cooperation. To increase capacity according to the community policing approach, the police taught 258 trainers and held 383 workshops. These efforts taught 5,443 policemen.[6] Moreover, the government included the "Community Policing" module in the basic training for police officers.[7] The National Police reported 3,771 meetings with citizens and 2,702 public events within the community policing framework.[8] Implementing the School and Police project, the police held 18,304 classes in schools, involving 527,621 children. The police conducted 3,301 camp trainings with 115,223 children participants. The police conducted 2,268 trainings in kindergartens, involving 86,556 children.[9]

The National Police extended the School and Police project to include Kharkiv, Dnipro, Severodonetsk, Lysychansk, Rubizhne, Chernivtsi, and Kropyvnytskyi.[10] Civil society activists, implementing community-police initiatives, also noted progress in introducing the community policing approach in police practice,[11] in particular as implemented by the Patrol Police (a division of the National Police).[12] However, the IRM researcher found no solid confirmation about citizen advisory groups. These efforts merit a ranking of substantial regarding completion of this commitment.

Did It Open Government?
Access to Information: Major
Civic Participation: Marginal

Community policing is a new concept in Ukraine. The approach constitutes part of the bigger police reform that started in 2014 and embodies the objective to change the low level of public trust toward the police.[13] Prior to implementation of this commitment, police did not proactively reach out to communities about crime prevention measures, and police did not traditionally interact with the public as part of building trust.

The commitment has led to a major improvement in access to information about police reform. It has also led to a change in the functioning of the police, including new channels for interaction with citizens. The commitment resulted in hundreds of workshops covering more than 5,000 police officials and over 6,000 meetings and public events. According to police officials, the information campaign covered the topics of gender violence, work with probation centers, work with people with disabilities, ecological initiatives, and sport events.[14] They also dealt with issues of family violence, bullying, wearable light reflectors, fraud, citizens' rights and duties, police activities, and community-police collaboration.[15] These efforts have changed the government practice in terms of providing information to citizens about the mandate and functioning of the police force, focus of the new Patrol Police reform, and how citizens can interact with police to prevent crime.

A civil society activist implementing community-police projects emphasized that due to a lack of resources, the government reformed only the Patrol Police according to the principles of community policing.[16] According to the activist, due to the preventive nature of their work, the Patrol Police are not fully acknowledged by the National Police.[17] Nevertheless, the activist felt that in communities

covered by the community policing project, trust toward the police is higher than in communities without this project.[18] An official from the police acknowledged that due to the openness of police, on web pages and social media, people increasingly report to police officers more often.[19]

The citizen advisory groups had not been established by the end of the action plan. However, the National Police reported 12 joint police-community projects. These projects are closely connected to the School and Police project: SHOP (nationwide), POLiS (nationwide), Secure Community (Kyiv), Basic Self-Defense Course for Women (Dnipro), Community Mapping (Ivano-Frankivsk), Patrol Policemen Jointly with Ukrtransbezpeka and Transporters Work with Communities (Uzhgorod), Secure City (Kherson), Policemen Assistant (Lviv), Red Cross (Chernivtsi), Security Sector (Boryspil), Local Project (Odesa), and Neighbor Watch (Vinnytsia).[20] The National Police noted that as the local population became more engaged in ensuring community security, residents sent more requests to introduce School and Police and Neighbor Watch projects in their neigbhourhoods.[21] These projects have helped to improve cooperation between police and communities. For example, in Brovary, the police detained a gang of burglars due to cooperation between locals and police officers.[22]

A civic activist facilitating community-police collaboration noticed that decentralization reform and the Community Policing project had a synergy effect. Several communities must decide with whom to form amalgamated communities. So local residents deliberate which communities are better to unite with and seek those with police stations, patrol cars, and a track record of efficient policing.[23] While not all reported activities can be directly attributed to the "Community Policing" approach, overall there are notable advancements in policing practices, that indicate a marginal change in regarding citizen participation.

Carried Forward?
When this report was written, the government had not published the next action plan. Therefore, it was not clear if the government carried this commitment forward. Whether or not the government has included it in the next OGP plan, the government needs to have thorough evaluation mechanisms to ensure that the trainings have a sustained impact. Additionally, to be effective, community policing projects need to extend beyond schools and reach more community members. Such efforts would naturally fit under the activities of civic advisory boards. The IRM researcher recommends continuing National Police trainings and expanding the School and Police project. Joint citizen-police patrolling could help to advance the collaboration.

[1] "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.
[2] Ibid.
[3] "September 1, Police Will Patrol School," Ukraine Today, 1 September 2016,
[4] "Secure Community," Facebook, https://www.facebook.com/bezpechna.gromada/?ref=br_rs.
[5] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.
[6] Oleksandr Kotsar (National Police of Ukraine), email exchange with IRM researcher, 14 August 2018.
[7] Kateryna Belugina (National Police of Ukraine), interview with IRM researcher, 15 August 2018.
[8] Oleksandr Kotsar (National Police of Ukraine), email exchange with IRM researcher, 14 August 2018.
[9] Ibid.
[10] Ibid.
[11] Uliana Shadska (Expert Center for Human Rights), interview with IRM researcher, 8 August 2018.
[12] Lydmyla Yankina (Information Center on Human Rights), interview with IRM researcher, 13 August 2018.
[13] "The Attitude of the Citizens of Ukraine Towards Social Institutions, Electoral Attitudes: The Results of Sociological Research, April 2017," Razumkov Center, http://razumkov.org.ua/uploads/socio/Press0417.pdf.
[14] Oleksandr Kotsar (National Police of Ukraine), email exchange with IRM researcher, 14 August 2018.
[15] Kateryna Belugina (National Police of Ukraine), email exchange with IRM researcher, 18 October 2018.
[16] Lydmyla Yankina (Information Center on Human Rights), interview with IRM researcher, 13 August 2018.
[17] Ibid.
[18] Ibid.
[19] Kateryna Belugina (National Police of Ukraine), interview with IRM researcher, 15 August 2018.
[20] Oleksandr Kotsar (National Police of Ukraine), email exchange with IRM researcher, 14 August 2018.

[21] Kateryna Belugina (National Police of Ukraine), interview with IRM researcher, 15 August 2018.
[22] Lydmyla Yankina (Information Center on Human Rights), interview with IRM researcher, 13 August 2018.
[23] Ibid.

12. Develop a draft law on public consultations

Commitment Text:

Development of a draft law on public consultations

Expected results: Development of the draft Law of Ukraine "On public consultations" to regulate matters related to the holding of consultations by the public authorities with the community and submission of the draft in accordance with established procedures for consideration by the Government.

Responsible institution: Ministry of Justice.

Supporting institutions: Charity Fund CCC Creative Center, the All-Ukrainian non-governmental organization Committee of Voters of Ukraine, the non-governmental organizations Ukrainian Center for Independent Political Research and Center for Policy and Legal Reform, the OSCE project coordinator in Ukraine, the Council of Entrepreneurs under the Cabinet of Ministers of Ukraine, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
12. Draft law on public consultations			✔			✔					✔				✔ (midterm) / ✔ Completed (end of term)				✔		

Commitment Aim:

This commitment aims to develop a draft law on public consultations. The government authorized the Ministry of Justice to develop the draft law of Ukraine On Public Consultations. The commitment calls for regulation of matters related to public authority consultations with the community and for the submission of a draft for Cabinet of Ministers consideration.

Status

Midterm: Substantial

By September 2017 the government had substantially completed this commitment. A multi-stakeholder working group developed the draft law, and it underwent wide public discussion.[1] According to the Ministry of Justice, the ministry held two expert discussions. It also consulted the general public via offline and online means. Civil society leaders provided input but noted that the discussion largely focused on legal issues instead of methods of implementation. In January 2017, the draft text was submitted to the Secretariat of the Cabinet of Ministers. This initial submission received comments by other government ministries and was resubmitted in June 2017.[2] The draft law had been initially expected to be submitted to the Cabinet of Ministers for adoption in December 2016. However, as of September 2017, it remained with the Secretariat of the Cabinet of Ministers. For more information, please see the 2016–2018 IRM midterm report.[3]

End of term: Complete

The Ministry of Justice submitted the revised draft of the law to the Cabinet of Ministers on 25 October 2017.[4] The Cabinet approved the draft on 20 December 2017.[5] On 27 December 2017 the Cabinet of Ministers submitted the draft law On Public Consultations to the Ukrainian Parliament, Verkhovna Rada.[6] A specialized committee reviewed the draft law. As a result, on 15 May 2018 the committee submitted a resolution requiring a substantial revision of the draft law. On 18 September 2018 Parliament returned the draft law to the government for revision.[7] A civil society activist who advocated the draft laws believed that this occurred because some members of Parliament (and the parliamentary committee) were offended by the planned law's mandate over Parliament (the requirement to consult the public about all future draft laws).[8] This activist admitted that as of September 2018, the situation seemed like a deadlock. In any case, by the end of the action plan, the draft law had been developed and submitted, which marks the completion of this commitment as written.

Did It Open Government?
Civic Participation: Marginal

The draft law envisioned establishing a framework for citizen engagement in public consultations at different levels and branches of government. The legal provisions were widely discussed. The government included requirements for recommended by civil society (the obligation that all policies can be adopted only after public consultations, consulting procedures, responsible officials, and inclusion of an accountability mechanism). Consequently, the government advanced in introducing clear guidelines for public discussion. The public consultations on this draft law demonstrated the good practice of citizen involvement. A civil society expert who participated in drafting the law acknowledged that stakeholders involved in deliberation of the draft law took the initiative to implement its regulations even before its formal adoption.[9] For instance, several municipalities took the draft laws as a guidance for action and proactively conducted public consultations.[10] The Ministry of Justice also conducted online consultations to draft this law.[11] As a result, offline working groups and online public consultations became more widespread within the ministry and in several other ministries.[12]

Carried Forward?
When this report was written, the government had not published the next action plan. Therefore, it is not clear if this commitment has been carried forward. The IRM researcher recommends Parliament adopt the law to institutionalize the practice of public consultations across the entire public administration. As a next step, government could issue an executive decree obliging central authorities to introduce mandatory public consultations according to the guidelines developed in the draft law.

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[1] "The Information on Public Deliberation," Civil Society and Authorities: Governmental Website (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/news/article/actual_lst/2781.

[2] "The Interim Report on the Realization of the Action Plan for the Implementation of the Open Government Partnership Initiative in 2016–2018," Civil Society and Authorities: Governmental Website, accessed 13 September 2017 (link no longer accessible as of 25 April 2018) http://civic.kmu.gov.ua/consult_mvc_kmu/uploads/attach-3467-910681586.doc.

[3] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[4] Natalia Bernatska (Ministry of Justice of Ukraine), email exchange with IRM researcher, 14 September 2018.

[5] Ibid.

[6] "The Draft Law on Public Consultations," #7453, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=63237.

[7] "The Draft Law on Public Consultations," #7453, the Verkhovna Rada of Ukraine: The Official Web-portal, http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=63237.

[8] Victor Tymoshchuk (Center of Policy and Legal Reform), interview with IRM researcher, 9 August 2018.

[9] Ibid.

[10] Victor Tymoshchuk (Center of Policy and Legal Reform), communication with IRM researcher, 18 October 2018

[11] Ibid.

[12] Victor Tymoshchuk (Center of Policy and Legal Reform), interview with IRM researcher, 9 August 2018.

13. Elaborate e-democracy roadmap

Commitment Text:

Development of e-democracy

Expected results: Development of the Conceptual design for the development of e-democracy and submission in accordance with established procedures for consideration by the Government (May 2017). Development of the action plan for the development of e-democracy and submission in accordance with established procedures for consideration by the Government (November 2017).

Responsible institution: State Agency for E-governance.

Supporting institutions: EGAP Program, Center for Innovations Development at the National University Kyiv-Mohyla Academy, the non-governmental organizations Center of Policy and Legal Reform, e-democracy, and Eidos Center for Political Studies and Analysis, other civil society institutions and international organizations (by consent).

Start date: December 2016 ..   **End date:** August 2018

Commitment Overview	Specificity				OGP Value Relevance (as written)				Potential Impact				Completion / Midterm End of Term				Did It Open Government?				
	None	Low	Medium	High	Access to Information	Civic Participation	Public Accountability	Technology & Innovation for Transparency & Accountability	None	Minor	Moderate	Transformative	Not Started	Limited	Substantial	Completed	Worsened	Did Not Change	Marginal	Major	Outstanding
13. Elaborate e-democracy roadmap		✔				✔		✔		✔						✔ / ✔				✔	

Commitment Aim:

This commitment aims to produce a conceptual design for the development of e-democracy (The Concept Paper) and submit it for consideration by the government. The commitment would also produce an action plan for the development of e-democracy. And it would result in the submission of that plan in accordance with established procedures for consideration by the government.

Status
Midterm: Complete

A multi-stakeholder coalition developed the concept paper and the action plan. This coalition consisted of civil society, nongovernmental organizations, international donors, representatives from academic institutions, and public service sector representatives, including the State Agency for E-Governance. The coalition submitted the concept paper and action plan to the Cabinet of Ministers for revision and further approval on 22 May 2017.[1] For further information, please see "Ukraine Mid-Term Report 2016–2018."[2]

The government approved the e-democracy roadmap on 8 November 2017.[3] The approval allowed the coalition members to start implementing plan directives in 2018.[4] Since January 2018, the State Agency for E-Governance and the multi-stakeholder coalition have executed the action plan by

engaging in projects that aim to facilitate the development of e-democracy in Ukraine. According to a civil society expert from the E-Governance and Accountability for Participation (EGAP) Program who actively participated in coalition activities from the beginning, coalition members felt a responsibility to actively execute the action plan because they had formally committed to the coalition and treated each other as equal partners.[5] Some policy changes resulted from the e-democracy commitment. The government made adjustments to the normative-legal act on "Citizens' Appeal" to regulate the processing of electronic petitions on local levels. This report discusses more examples of the results associated with the e-democracy commitment in the following section.

Did It Open Government?
Civic Participation: Major

Before the implementation of this action plan, no consolidated government policy existed regarding the support of digital democracy in the country. All the existing initiatives were uncoordinated and depended on the goodwill of individual officials and politicians. The e-democracy roadmap established a common framework, opened new ways of engagement and cooperation between members of civic society, and instituted clear priorities. The creation and operation of the multi-stakeholder coalition established an inclusive and collaborative framework for authority–civil society interaction. As all coalition members had an equal voice during the drafting of the concept paper and the action plan, there was a substantial level of public influence. This approach has been sustained in the subsequent government practice of and inclusive and collaborative policy making in the domain of digital democracy.

A prominent example of cooperation between the coalition members on the action plan implementation is the project carried out with the State Statistics Service of Ukraine[6] (SSSU). SSSU intended to create a report about the development of e-democracy at local levels throughout the country. For that aim, it required a methodology. SSSU requested a methodological input from the State Agency for E-Governance. The latter, in turn, requested information from coalition members, who provided a detailed set of indicators for evaluating the advance of e-democracy. These indicators are expected to be used by SSSU for annual measurement. This stands as an unprecedented case of the direct involvement of civil society in drafting the policy of statistical indicators on e-participation. Another model engagement of civil society in the development of e-democracy is the national competition Open Data Challenge.[7] The competition attracted 190 information-technology projects that use open access data for grassroots activism and collaboration with authorities. Projects covered digital health, infrastructure, agriculture, legal technology, and ecology, among other topics. This competition embodied multi-stakeholder (uniting authorities, business, and the non-governmental sector) support of open data for online participation.

Carried Forward?
When this report was written (September 2018), the commitment had been fully completed in terms of development of the e-democracy concept paper and action plan.[8] The next steps should focus on finishing the implementation of the current action plan, evaluating its effectiveness[9] and feasibility, and finally, developing a new action plan for the next two years.[10]

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[1] "Ukraine Mid-Term Report 2016–2018," Open Government Partnership, accessed 15 September 2018, https://www.opengovpartnership.org/sites/default/files/Ukraine_Mid-Term_Report_2016-2018_EN.pdf.

[2] Ibid.

[3] "The Government Approves the E-democracy Concept Paper and the Action Plan (2017)," State Agency for E-Governance, accessed 13 September 2018, https://www.e.gov.ua/content/uryad-shvalyv-koncepciyu-rozvytku-elektronnoyi-demokratiyi-ta-plan-zahodiv-z-yiyi.

[4] Serhiy Karelin (EGAP), interview with junior researcher, 13 September 2018.

[5] Ibid.

[6] Ibid.

[7] Open Data Challenge, https://odc.in.ua/.

[8] Valeriya Tkach (State Agency for E-Governance), email exchange with junior researcher, 15 September 2018.

[9] Ibid.

[10] Serhiy Karelin (EGAP), interview with junior researcher, 13 September 2018.

Methodological Note

The end-of-term report is based on desk research, interviews with governmental and nongovernmental stakeholders, and observations of sectoral multi-stakeholder meetings. The IRM report builds on the findings of the government's self-assessment report; other assessments of progress put out by civil society, the private sector, or international organizations; and the previous IRM progress report.

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The Open Government Partnership (OGP) aims to secure concrete commitments from governments to promote transparency, to empower citizens, to fight corruption, and to harness new technologies to strengthen governance. OGP's Independent Reporting Mechanism assesses development and implementation of national action plans to foster dialogue among stakeholders and to improve accountability.

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