

# IMPACT OF LOCAL CSOS ON IMPLEMENTING ANTI-CORRUPTION REFORMS IN THE REGIONS OF UKRAINE



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## PREFACE

The success of Ukraine's anti-corruption drive hinges on its implementation at different administrative levels, especially in light of the ongoing decentralization reform. Given that civil society organizations can fulfill an important role in anti-corruption, it is important that such organizations develop sufficient capacity not only at the national level, but in the regions of Ukraine as well. The report "Impact of Local CSOs on Implementing Anticorruption Reforms in the Regions of Ukraine" highlights the challenges of local anti-corruption initiatives in the regions of Ukraine, and provides recommendations with a view of offering more effective (international) assistance to such initiatives. The report draws from a comprehensive study of anti-corruption activism in the regions of Ukraine conducted by the Anti-Corruption Research and Education Center (ACREC) of the Kyiv-Mohyla Academy and Leiden University. Particularly, the report is based on dataset containing publicly available information of anticorruption organizations that are based outside of Kyiv and on 242 semi-structured, confidential interviews with representatives of these organizations conducted between June 2018 and April 2019. The full version of the report in English and Ukrainian can be found on ACREC's official website under «Research and Analytics».

## PART I

### WHY SUPPORT ANTI-CORRUPTION ACTIVISM IN THE REGIONS OF UKRAINE?

Civil society organizations are widely recognized as actors which can play a vital role in fighting corruption. Article 13 of the United Nations Convention against Corruption, for instance, stipulates that “[e]ach State Party shall take appropriate measures, within its means and in accordance with fundamental principles of its domestic law, to promote the active participation of individuals and groups outside the public sector, such as civil society, non-governmental organizations and community-based organizations, in the prevention of and the fight against corruption and to raise public awareness regarding the existence, causes and gravity of and the threat posed by corruption”.<sup>1</sup>

The traditional approach to fighting corruption has often been seen in strengthening mechanisms of horizontal accountability in the public sector.<sup>2</sup> There has been a growing realization, however, that mechanisms of accountability such as specialized anti-corruption agencies, legislative investigative commissions, and administrative courts, are not enough in environments where corruption is endemic. Inspired by pessimism about the systemic nature of corruption in many polities, the idea that the agents of corruption must be directly held accountable by citizens has become more influential. This type of accountability by citizens outside elections is often referred to as ‘social accountability’, which has been defined as ‘an approach toward building accountability that relies on civic engagement, i.e., in which it is ordinary citizens and/or civil society organizations that participate directly or

indirectly in exacting accountability’.<sup>3</sup>

Civil society organizations may have benefits vis-à-vis other types of organizations making them particularly effective at enforcing social accountability. Some possess advanced skills in, for example, the monitoring of government performance. Other civil society organizations have extensive experience with mobilizing people for public protest. Unlike international organizations, domestic civil society organizations often have the type of in-depth knowledge of local corruption necessary for devising effective anti-corruption strategies. Domestic civil society organizations, especially those with deep roots in society, may also benefit from forms of social capital and trust that foreign agencies and international actors lack. Because of these benefits and the positive connotations of social accountability civil society organizations have been widely championed by development practitioners.

Civil society organizations engaged in fighting corruption can choose from a wide array of different types of activities.<sup>4</sup> A review of academic and practitioner literature suggests that the activities of anti-corruption civil society organizations fall under six categories: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance.<sup>5</sup>

Many civil society organizations monitor the operations of individuals or institutions that are known to be corrupt or that are at risk of becoming

1 See [https://www.unodc.org/documents/brussels/UN\\_Convention\\_Against\\_Corruption.pdf](https://www.unodc.org/documents/brussels/UN_Convention_Against_Corruption.pdf)

2 O'Donnell, Guillermo. 1999. “Horizontal accountability in new democracies”, in Andreas Schedler, Larry Diamond, and Marc F. Plattner (eds.) *The Self-Restraining State: Power and Accountability in New Democracies*. Boulder, CO: Lynne Rienner, 29-51.

3 Malena, Carmen, Reiner Forster, and Jamejay Singh. 2004. *Social Accountability An introduction to the concept and emerging practice*. The World Bank Social Development Paper no. 76, p.i

4 Holloway, Richard. 2008. *NGO Corruption Fighters' Resource Book – How NGOs can use monitoring and advocacy to fight corruption*. Available from: <https://www.ndi.org/files/NGO-Corruption-Fighters-Resource-Book-ENG.pdf>

5 Carr, Indira, and Opi Outhwaite. «2011. The role of non-governmental organizations (NGOs) in combating corruption: Theory and practice.» *Suffolk UL Rev.* 44: 615; Johnsen, Jesper, Nils Taxell, and Dominik Zaum. 2012. *Mapping Evidence Gaps in Anti-Corruption: Assessing the State of the Operationally Relevant Evidence on Donors' Actions and Approaches to Reducing Corruption*. 7. U4.

corrupted.<sup>6</sup> Common areas of monitoring include public procurement, where activists may find conflicts of interest or discrepancies between the prices of procurement purchases and market prices; asset declarations of politicians and officials, where they may identify discrepancies between declared assets and actual assets; and public expenditure, where they may discover 'leakage' of public funds to private pockets. Civil society organizations also monitor the performance of service providers in terms of transparency and integrity using instruments such as report cards and social audits. New technologies have in recent decades expanded the possibilities for monitoring and reporting corruption, for instance through crowdsourcing.<sup>7</sup>

Civil society organizations engage in awareness-raising to alert the public to corruption and to increase knowledge about corruption to a broader circle of people. In their awareness-raising efforts they may draw on existing reports or conduct their own monitoring or investigations and then report the findings through friendly media outlets or through social media. Another distinction among awareness-raising efforts is between those that are about sounding 'fire alarms' on specific cases of abuse and those that are part of concerted campaigns.<sup>8</sup> A notable example of a sustained awareness-raising campaign is Transparency International's Corruption Perceptions Index.

Civil society organizations engage in advocacy for legislative changes and for public sector reforms. They can do so through quiet lobbying efforts, but often the advocacy takes the form of

public campaigns and is carried out by coalitions consisting of like-minded organizations. To maximize effect, activists may also enlist the help of other types of actors such as the media or international partners.

There are several ways in which civil society organizations can use direct action. Organizations with sufficient weight and resources can file lawsuits against corrupt actors when there is at least some degree of trust in the independence of the legal system.<sup>9</sup> They can also put pressure on authorities or other actors by organizing demonstrations or other types of public events for which they mobilize their supporters (Grimes 2013: 384). While such protests are peaceful most of the time, activists can also apply confrontational and coercive methods, for instance by blocking roads or by physically confronting corrupt actors.

Rather than directly confronting corruption, civil society organizations can also strengthen their own capacity and that of others in order to become more effective at fighting corruption. Education and training are one such type of capacity-strengthening. Anti-corruption education can be aimed at other activists to train them in skills such as monitoring; at officials, to educate them on integrity norms; or at the general public with the goal of increasing knowledge about corruption.<sup>10</sup> Another form of capacity-strengthening entails building coalitions with, for instance, government actors, businesses, and international actors. A benefit of this type of capacity-strengthening is that it increases the number of stakeholders with an interest in fighting corruption and with the capacity to do so.<sup>11</sup>

Finally, activists can contribute to anti-corruption through co-governance, in which they become directly involved in public governance alongside state authorities. The most extensively studied form of co-governance is participatory budgeting,

6 Bukenya, Badru, Sam Hickey, and Sophie King. 2012. Understanding the Role of Context in Shaping Social Accountability Interventions: Towards an Evidence-Based Approach. The World Bank Social Accountability and Demand for Good Governance Team; Olken, Benjamin A. 2007. "Monitoring Corruption: Evidence from a Field Experiment in Indonesia." *Journal of Political Economy* 115 (2):200–249; Reinikka, Ritva, and Jakob Svensson. 2005. «Fighting corruption to improve schooling: Evidence from a newspaper campaign in Uganda.» *Journal of the European economic association* 3, no.2-3: 259-267.

7 Ang, Yuen Yuen. 2014. "Authoritarian Restraints on Online Activism Revisited: Why "I-Paid-A-Bribe" Worked in India but Failed in China." *Comparative Politics* 47(1): 21-40; Zinnbauer, Dieter. 2015. "Crowdsourced Corruption Reporting: What Petrified Forests, Street Music, Bath Towels, and the Taxman Can Tell Us About the Prospects for Its Future." *Policy & Internet* 7(1): 1–24.

8 Smulovitz, Catalina, and Enrique Peruzzotti. 2000. "Societal Accountability in Latin America." *Journal of democracy* 11(4): 147-158.

9 Davidson, Jamie S. 2007. "Politics-as-Usual on Trial: Regional Anti-Corruption Campaigns in Indonesia." *Pacific Review* 20(1): 75–99.

10 Vukovic, Danilo. 2014. "Civil Society, Accountable Government and the Rule of Law." *SSRN Electronic Journal*, December.

11 Fox, Jonathan A. 2015. "Social accountability: what does the evidence really say?" *World Development* 72: 346-361; Tisné, Martin, and Daniel Smilov. 2004. *From the Ground up: Assessing the Record of Anticorruption Assistance in Southeastern Europe*. Policy Paper. Policy Studies Series. Budapest: Center for Policy Studies, CEU.

in which ordinary people, typically at the municipal level, decide how to allocate public funds.<sup>12</sup> Activists can also be invited by the government to provide advice on a more or less permanent basis, for instance by joining expert councils.<sup>13</sup>

The conditions for supporting anti-corruption activism in the regions of Ukraine are auspicious. There are few legal constraints on the functioning of civil society organizations, and the relevant legislative framework is respected across the country. The activities of anti-corruption civil society organizations are aided by progressive legislation forcing authorities to share public information, follow transparency rules with regard to public procurement, and disclose the assets and income of officials. At the same time, civil society organizations in the regions of Ukraine tend to be significantly weaker than their counterparts in Kyiv. There are a number of anti-corruption organizations in the capital city that possess advanced professional skills, manage to obtain substantial funding, and have extensive contacts with foreign and international partners. The impact of these organizations is rarely matched by similar organizations working at the regional and local level. International support for regional anti-corruption activism, accordingly, should be aimed at replicating the successes of national-level organizations in the regions of the country.

## **ACTIVITIES AND IMPACT OF REGIONAL ACTIVISTS**

We have constructed a dataset containing publicly available information of anti-corruption organizations that are based outside Kyiv. In addition, we have conducted 242 semi-structured, confidential interviews of on average one to one and a half hours with representatives of these

organizations between June 2018 and April 2019. Organizations were identified based on the criteria that they explicitly, or according to their records, confront corruption, understood here, in accordance with the definition of the World Bank, as abuse of public or corporate office for private gain.<sup>14</sup> The organizations in our dataset cover a wide spectrum. They include formally registered organizations and non-registered grassroots initiatives; organizations with diverse ideological positions including liberalism and nationalism; organizations involved in 'traditional' CSO activities such as awareness-raising and advocacy, but also organizations employing coercive methods. Of the organizations with whom we have conducted interviews, 182 are located in a regional capital city and 62 are located outside the regional capital. Most of the organizations interviewed are concerned with corruption related to the authorities of the city in which they are based. Many organizations in addition address corruption related to authorities at the regional (oblast) level.

## **INSTRUMENTS AND ACTIVITIES**

According to existing academic and practitioner literature on the topic, anti-corruption civil society organizations are primarily involved in six types of activities: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance alongside state authorities. Each of these types of activities can be found among anti-corruption civil society organizations in Ukraine.

108 organizations in our dataset conduct some type of monitoring in at least one policy area. Most common (55 organizations) is monitoring of decision-making by legislative councils and executive authorities. According to our interlocutors, the purpose of this type of monitoring is usually to reveal either potential conflicts of interest or whether a certain

12 Abers, Rebecca. 1998. "From Clientelism to Cooperation: Local Government, Participatory Policy, and Civic Organizing in Porto Alegre, Brazil." *Politics & Society* 26 (4): 511–37; Wampler, Brian. 2008. "When Does Participatory Democracy Deepen the Quality of Democracy? Lessons from Brazil." *Comparative Politics* 41 (1): 61–81. <https://doi.org/10.2307/20434105>.

13 Tisné and Smilov, op.cit., p.19

14 Bhargava, Vinay. 2005. *The Cancer of Corruption*. World Bank Global Issues Seminar Series. Retrieved from <http://siteresources.worldbank.org/EXTABOUTUS/Resources/Corruption.pdf>



regulation is prone to abuse for corrupt ends. Conducting monitoring of decision-making by legislative councils and executive authorities is possible because of the existence of an important law on access to public information, adopted in 2011. According to this law, anyone is entitled to request and obtain public information, defined as 'information that is reflected and documented by any means and information medium and which was received or created in the process of performance by subjects of public authority of their duties [...]', such as legislative council decisions or information on the disbursement of budget funds.<sup>15</sup> The second most common (47 organizations) type of monitoring is monitoring of public procurement. This type of monitoring has become easier to conduct due to the introduction in 2015 of ProZorro, an electronic procurement system that is now used for all purchases representing a value above a certain threshold. A number of organizations from Kyiv and outside Kyiv use the platform DoZorro to track their progress.<sup>16</sup> This platform shows, among other things, how many instances of procurement have been monitored, how many violations have been uncovered, and what the result has been of the action undertaken after the violations were uncovered. Also common (34 organizations) is the monitoring of electronic asset declarations of public officials, typically with the aim to identify inconsistencies between the stated income and assets of officials and their actual income and assets. An organization from Dnipro, for instance, monitors the asset declarations of the leadership of the regional branch of the State Agency of Motor Roads of Ukraine. After the organization found a number of inconsistencies in declarations, the relevant officials were forced to enter corrections.<sup>17</sup> The systematic monitoring of asset declarations has become possible due to the launch in 2016 of an open registry of asset declarations for all public officials. If they find evidence of corruption in decision-making, public procurement, or asset declarations, civil society organizations can file an appeal to relevant

authorities including public prosecutor's offices and the country's specialized anti-corruption bodies who may use the information to initiate a criminal investigation or proceeding. 99 of the organizations in our dataset have explicitly indicated that they have filed this type of appeal at least once.

117 organizations in our dataset engage in activities that fall under the broad umbrella of awareness-raising. For some of these organizations awareness-raising is just one of their activities. For other organizations, in particular information agencies specializing in corruption, awareness-raising is their core activity. Some organizations use data and information generated by others in their awareness-raising efforts. Other organizations conduct their own investigations or monitoring and then disseminate the results. One organization from Rivne, for instance, has investigated corruption in obtaining drivers' licenses and then brought the issue to the attention of the public through friendly media outlets, after which the public prosecutor opened a criminal investigation.<sup>18</sup> For a majority of organizations, Facebook is the main platform through which they raise awareness about cases of corruption and communicate with their audience. Besides Facebook, the anti-corruption organizations often cultivate relationships with media outlets through which they can publish information.

44 organizations are regularly involved in advocacy efforts. These efforts are usually aimed at the adoption by relevant authorities of policies that in majority are related to increasing transparency in public administration or the introduction of integrity mechanisms. An organization from Kropyvnytskyi, for instance, developed an entire set of anti-corruption regulations that were adopted by the city council.<sup>19</sup> In another example, an organization from Chernihiv has successfully lobbied for amendments to existing regulations aimed at making the regulations less prone to abuse.<sup>20</sup>

15 Zakon Ukrainy Pro dostup do publichnoyi informatsiyi. See <http://zakon.rada.gov.ua/laws/show/2939-17>

16 See <https://dozorro.org/>

17 Interview with representative of civil society organization, 4 September 2018, Dnipro

18 Interview with representative of civil society organization, 29 September 2018, Rivne

19 Interview with representative of civil society organization, 14 December 2018, Kropyvnytskyi

20 Interview with representative of civil society organization, 10 December 2018, Chernihiv



70 organizations employ different forms of direct action in their fight against corruption. The most common forms of direct action by these organizations are filing lawsuits (49 organizations) against corrupt individuals and firms and organizing demonstrations (25 organizations). An organization from Khmelnytskyi, for instance, has filed and (then won) a lawsuit over illegal payments in the city's schools.<sup>21</sup> Demonstrations organized by anti-corruption activists most commonly take place in front of the city administration or the city council. While such demonstrations are usually peaceful gatherings, some groups, often led by (radical) nationalists or veterans from the conflict in the country's East, employ coercive methods to achieve their goals. In Kryvyi Rih, for example, activists have seized and destroyed illegal alcohol sold in stores that were protected by local authorities.<sup>22</sup> In another example, activists in Kharkiv directly confronted the proprietors of an illegal gas station in the city forcing them to close their business.<sup>23</sup>

Anti-corruption organizations in Ukraine engage in two types of capacity-building: creating coalitions with other civil society organizations and conducting trainings. At the national level, the Reanimation Package of Reforms coalition of civil society organizations and experts has served as an effective mechanism through which civic actors, including anti-corruption activists, have become involved in processes of deliberation with policymakers. Anti-corruption activists in a range of cities attempt or have attempted to emulate the example of RPR, sometimes with the assistance of international partners. 52 organizations conduct trainings on issues related to anti-corruption. A common type of anti-corruption training is to members of municipal councils and to public servants in state administrations on, for instance, conflicts of interest or filling out asset declarations. Anti-corruption organizations also organize trainings for other activists on, for example, how to monitor procurement and asset declarations or on how to

conduct anti-corruption investigations.

Finally, six anti-corruption organizations have, upon invitation, been involved in some type of co-governance alongside state authorities. One such example of co-governance is that of an organization from Cherkasy which took part in an attestation commission that hired new police officers.<sup>24</sup> Another example is that of an organization from Drohobych which was tasked with the introduction of e-government mechanisms aimed at reducing opportunities for corruption.<sup>25</sup>

## IMPACT

A majority of interlocutors from regional anti-corruption organizations emphasize that they have difficulty creating substantial impact. Among the reasons for their limited effectiveness they most often mention a lack of financial and human resources, passivity among the public, and intimidation from the side of the authorities or others. Of the 87 organizations whose representatives mention a lack of financial resources as a reason for their limited effectiveness, many work without grant funding. Representatives of organizations which do receive grants, however, note that those are generally small and short-term. Other substantial sources of income, such as membership fees and contributions by sympathizers, are rare. Representatives of sixty organizations explicitly mention a lack of human capacity as an impediment to effectiveness. The main reason why it is hard for the anti-corruption organizations to attract qualified people is that they have limited opportunities to offer competitive salaries. Another reason that is often mentioned is that talented activists often move to Kyiv or abroad. Representatives of thirty organizations attribute their lack of effectiveness in part or in full to the passivity of the general population in their area. They argue that people are uninformed

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21 Interview with representative of civil society organization, 26 November 2018, Khmelnytskyi

22 Interview with representative of civil society organization, 27 May 2019, Kryvyi Rih

23 Interview with representative of civil society organization, 13 June 2018, Kharkiv

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24 Interview with representative of civil society organization, 3 October 2018, Cherkasy

25 Interview with representative of civil society organization, 21 November 2018, Drohobych

and disinterested in corruption, and that many have grown disillusioned with civic activism and with the lack of progress in the fight against corruption in the years since the Euromaidan Revolution. Finally, representatives of 25 organizations mention intimidation as a factor that limits the effectiveness of their work. Activists in cities such as Kharkiv, Mykolaiv and Kherson, for instance, have recounted how they have been physically attacked by unknown or known assailants. More common than physical violence are verbal threats. While the impact of these forms of intimidation cannot be measured, it is likely that it keeps some people away from working on anti-corruption, and that many of those who do work on anti-corruption take fewer risks than they would otherwise.

Some interlocutors do not point to concrete success stories of their work but claim nonetheless that their work has an impact. They argue that raising awareness about corruption has made corrupt behavior more costly because of the greater risk of getting named and shamed and that, consequently, officials have become more reluctant to engage in corrupt behavior.<sup>26</sup> If this is correct, then anti-corruption activists to some degree can engender good governance among local and regional authorities just by carrying out a watchdog function. Besides immeasurable impact, many activists can point to concrete examples of impact despite the difficulties that they face in their work. An organization from Mykolaiv, for instance, has been successful in cancelling payments for certain forms of treatment in the city's hospitals.<sup>27</sup> An organization from Dnipro has prevented the illegal cutting of trees.<sup>28</sup> And activists from Drohobych have been instrumental in imposing fines on stores which sold alcohol illegally.<sup>29</sup>

Positive impact from the work of anti-corruption activists can be separated into counteracting

corruption as it occurs (ex post anti-corruption) and preventing corruption from occurring in the first place (ex ante anti-corruption). During interviews, our interlocutors have presented 193 examples of impact, including 134 examples of ex post anti-corruption and 59 examples of ex ante anti-corruption. The most common type of ex post anti-corruption effect (52 cases) concerns the initiation of criminal investigations or prosecution of corrupt individuals or firms based on information provided by activists. Another common type of ex post effect (22 cases) is the annulment of a public procurement following a publication or an official appeal by activists. Interlocutors have also presented 16 examples of corrupt or corruption-prone decisions of local or regional authorities having been rolled back thanks to their efforts. An organization from Odesa, for instance, has successfully challenged the city's annual budget on grounds that it was prone to corruption.<sup>30</sup> In another example, an organization from Marhanets has accomplished that assets that were illegally privatized assets by the city's authorities were returned to the state.<sup>31</sup> A final type of ex post anti-corruption effect resulting from the work of civil society organizations in the regions of Ukraine that is common (27 cases) is the dismissal of corrupt officials. In Kropyvnytskyi, for instance, anti-corruption activists have been successful in forcing the dismissal of local officials in charge of public utilities.<sup>32</sup> And in the cities of Ukrayinka and Sviatohirsk, activists have taken credit for leading anti-corruption campaigns that forced the mayor of the city out of office.<sup>33</sup>

Less common are examples of ex ante anti-corruption effects. Interlocutors have mentioned 59 cases in which legislation or regulations have been adopted or amended with the goal to prevent corruption and as a result of their efforts. In seven municipalities in the Ivano-Frankivsk

26 Interview with representative of civil society organization, 3 October 2018, Cherkasy; interview with representative of civil society organization, 4 October 2018, Mariupol

27 Interview with representative of civil society organization, 8 November 2018

28 Interview with representative of civil society organization, 3 September 2018, Dnipro

29 Interview with representative of civil society organization, 21 November 2018, Drohobych

30 Interview with representative of civil society organization, 18 September 2018, Odesa

31 Telephone interview with representative of civil society organization, 26 November 2018

32 Interview with representative of civil society organization, 14 December 2018, Kropyvnytskyi

33 Telephone interview with representative of civil society organization, 17 November 2018; telephone interview with representative of civil society organization, 27 November 2018

region, for instance, anti-corruption instruments were adopted following trainings on integrity in public administration conducted by an organization from Ivano-Frankivsk.<sup>34</sup> In a similar example, an advocacy effort by an organization from Khmelnytskyi resulted in the adoption by the city council of a new regulation on conflicts of interest.<sup>35</sup> An organization from Kherson successfully lobbied the introduction of more transparency in tenders by universities in the city.<sup>36</sup> And in several cities, including Chuhuiv, Kharkiv, Kherson, Khmilnyk, and Severodonetsk, activists have been successful in persuading the local authorities to lower the threshold for the use of the electronic procurement system ProZorro.<sup>37</sup>

## THE SIGNIFICANCE OF LOCAL CONTEXT

While Ukraine is a unitary state, political dynamics across the country vary. These different dynamics are reflected in, among other things, the extent of political will among regional and local political authorities to overcome corruption. Cities with a relatively high degree of political will to overcome corruption, according to our interlocutors, include Chernivtsi, Ivano-Frankivsk, Lutsk, Kropyvnytskyi, and Rivne. In cities such as Dnipro, Kharkiv, Mykolaiv, Nikopol, Odesa, Ternopil, Uzhhorod, and Zaporizhzhia, by contrast, political will is mostly absent. It should be noted that, of course, political will can fluctuate over time, including as a result of the arrival of new leaders. The existence of political will can also be scattered, with some government agencies demonstrating a greater extent of political will than other agencies.

Whether or not the attitude to corruption of local

authorities is aligned with that of anti-corruption activists has major implications for the advocacy strategies that activists pursue. The existence of political will among local authorities allows for the application of non-confrontational methods such as advocacy, which relies on successful persuasion and eventual consent. Altogether our interlocutors have mentioned 59 examples of concrete impact through advocacy. Especially impressive examples of such successful advocacy include the adoption by city councils in Kropyvnytskyi and Dnipro of a set of anti-corruption regulations that were drafted and proposed by activists and the creation of an integrity bureau at the city council in Lutsk.<sup>38</sup> More modest examples of impact through advocacy include the adoption by the city council of Khmelnytskyi of proposals for rules about conflicts of interest that were lobbied by activists, and the contribution of one anti-corruption organization to new regulations about public information in Kremenchuk.<sup>39</sup>

These examples illustrate that the presence of political will among local authorities to address corruption creates more opportunities for activists to generate impact. The presence of political will to address corruption also enables certain forms of cooperation between anti-corruption organizations and authorities. In some cities anti-corruption organizations have signed memorandums of understanding or cooperation with local authorities. In Chernihiv, an anti-corruption organization has signed a memorandum of understanding with the regional branch of the State Fiscal Service.<sup>40</sup> In Kharkiv, an anti-corruption organization has found it difficult to find an understanding with city authorities but has been able to conclude a memorandum of cooperation with the Kharkiv regional council.<sup>41</sup> And in Zaporizhzhia, civil society organizations

34 Interview with representative of civil society organization, 16 October 2018, Ivano-Frankivsk

35 Interview with representative of civil society organization, 27 October 2018, Khmelnytskyi

36 Interview with representative of civil society organization, 7 November 2018, Kherson

37 Telephone interviews with representative of civil society organization, 13 June 2018; Interview with representative of civil society organization, 6 November 2018, Kherson, Interview with representative of civil society organization, 18 September 2018, Khmilnyk

38 Interview with representative of civil society organization, 14 December 2018, Kropyvnytskyi; interview with representative of civil society organization, 4 September 2018, Dnipro; interview with representative of civil society organization, 8 October 2018, Lviv

39 Interview with representative of civil society organization, 27 October 2018, Khmelnytskyi; interview with representative of civil society organization, 29 May 2018

40 Interview with representative of civil society organization, 10 December 2018, Chernihiv

41 Interview with representative of civil society organization, 13 June 2018, Kharkiv

have been among the participants in an anti-corruption commission that signed a memorandum of cooperation with city authorities to fight corruption in the city's healthcare system. The anti-corruption commission, however, was subsequently disbanded because, according to our interlocutors, it was seen as a threat to the interest of local political elites.<sup>42</sup>

Another form of cooperation between anti-corruption organizations and local authorities concerns rare cases of co-governance in which the anti-corruption organization is engaged to fulfill a specific task alongside state authorities. In Chernihiv, for instance, activists have been included in a working group that has drafted a new set of anti-corruption regulations.<sup>43</sup> And in Drohobych and Lviv, anti-corruption organizations have worked with the city authorities to introduce e-government instruments which were intended to reduce opportunities for corruption.<sup>44</sup>

In some places including Drohobych, Khmelnytskyi, Mykolaiv, and Zhytomyr, anti-corruption activists serve as unpaid advisors to the mayor or governor. While the actual impact of having this position may vary, it provides the activists with a direct channel to the political leadership of the city or region. Finally, in a range of cities including Odesa, Mykolayiv, and Nikopol, anti-corruption organizations participate in public councils. These public councils have been set up around the country over the past decade to facilitate deliberation between civic actors and state authorities. The utility of such councils, according to our interlocutors, is limited, but they create an opportunity to directly interact with officials.

While there is not one factor that explains all variation in the extent of political will to fight corruption in Ukraine, a variable that is particularly important is the extent to which control over corruption is centralized among local political and economic actors. Under conditions of

decentralized corruption, corruption may still be systemic, but it lacks central coordination. Political power and economic resources are not (fully) fused, and several 'pyramids' of corruption exist side by side, with no one actor being the exclusive beneficiary of illicit activities.<sup>45</sup> Decentralized corruption goes along with real political competition and media pluralism. While at least some media outlets are independent from local executive authorities, however, they may serve the interests of other powerful economic or political actors. Typical examples of decentralized corruption, according to interlocutors, include Cherkasy, Chernivtsi, and Kropyvnytskyi. In cities or regions with decentralized corruption, anti-corruption is often instrumentalized by politicians to discredit opponents.<sup>46</sup> This instrumentalization of anti-corruption by politicians combined with media pluralism means that anti-corruption activists have greater opportunities to fight corruption than under conditions of more centralized corruption. An activist from Kropyvnytskyi, for instance, has argued that "[u]nder conditions of severe competition between corrupt officials one party helps fighting another one. This way it was possible to achieve the dismissal of some corrupt officials."<sup>47</sup> Similarly, an activist from Ternopil has argued that "[a]nti-corruption is a tool in a fight among clans. Black PR is an important element in this: with media being financially dependent on different groups, information about corruption leaks out into the press, and the public is manipulated".<sup>48</sup>

Centralized corruption, by contrast, is characterized by concentrated executive

42 Interview with representative of civil society organization, 1 October 2018, Zaporizhzhia

43 Interview with representative of civil society organization, 1 November 2018, Chernihiv

44 Interview with representative of civil society organization, 9 October 2018, Lviv; interview with representative of civil society organization, 21 November 2018, Drohobych

45 Stefes, Christoph H. 2006. *Understanding Post-Soviet Transitions: Corruption, Collusion and Clientelism*. Euro-Asian Studies. New York: Palgrave Macmillan, p.3

46 Huss, Oksana. 2018. "Corruption, Crisis, and Change: Use and Misuse of an Empty Signifier." In *Crisis and Change in Post-Cold War Global Politics*, edited by Erica Resende, Dovilė Budrytė, and Didem Buhari-Gulmez, 97–128. Cham: Palgrave Macmillan.

47 Interview with representative of civil society organization, 14 December 2018, Kropyvnytskyi

48 Interview with representative of civil society organization, 20 November 2018, Ternopil

authority.<sup>49</sup> Under conditions of centralized corruption, political and economic power are fused, and the political leadership is able to control the flows of rents generated from corruption. By providing benefits to core economic actors in exchange for (financial) support during election campaigns, the executive authorities ensure their political dominance over a sustained period.<sup>50</sup> While there may formally be some degree of pluralism in the city of regional council, one person or one group controls the distribution of public resources. Examples of centralized corruption, according to interlocutors, are found in Chernihiv, Dnipro, Nikopol, Kharkiv, Odesa, Ternopil, Uzhhorod, and Zaporizhia.

Cities and regions with centralized corruption were characterized by our interlocutors as regions with little to no political will to overcome systemic corruption. Nonetheless, as our data suggest, anti-corruption activism under conditions of centralized corruption is sometimes effective. In large part this is possible because political leaders who stand at the top of centralized corruption may have an interest in cracking down on certain forms of corruption that are prevalent at lower levels of the state apparatus, and this selective focus on anti-corruption creates opportunities for activists. As Stefes asserts, political leadership under conditions of centralized corruption has “an interest in curbing corrupt activities, because the costs of widespread corruption among lower officials outweigh the benefits that accrue for example in the form of bribes that flow to the top”.<sup>51</sup> In Kharkiv, for instance, an activist has reported that the city’s mayor demonstrates the will to fight some forms of petty corruption while leaving grand corruption untouched.<sup>52</sup> In another example, an activist has argued that Odesa’s mayor uses selective anti-corruption prosecution

to punish the perceived disloyalty of his “clients”.<sup>53</sup> Another city where this dynamic can be observed is Mariupol, where the economy is dominated by a few large enterprises and a single oligarch has captured much of local government. Despite the existence of centralized corruption in Mariupol, the city was ranked in 2018 as the second most transparent in Ukraine.<sup>54</sup>

These and other examples demonstrate that making informed choices in support to anti-corruption activism in Ukraine requires insight into the local political and economic context of cities and regions. There is a large variety among regional and local authorities in the extent of political will to overcome corruption, and these differences have implications for the strategies of anti-corruption activists. Where there is little political will, activists often have little choice but to employ confrontational methods such as monitoring of (potentially) corrupt actors, awareness-raising about corruption, and direct action including the filing of lawsuits and the organization of demonstrations. The presence of political will among local authorities, on the other hand, allows for the application of non-confrontational methods such as advocacy of anti-corruption regulations. Even under conditions of centralized corruption with generally limited political will to overcome corruption, however, it may be that political authorities nonetheless have incentives to address certain forms of corruption. Finally, those interested in supporting anti-corruption activism should also realize that in any context certain forms of corruption may be highly prevalent while other forms of corruption are virtually non-existent.

## **THE IMPORTANCE OF STRENGTHENING CAPACITY**

Next to political will, another variable with a significant impact on the effectiveness of anti-

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49 Huss, Oksana. “Framing and practicing corruption as a political tactic in hybrid regimes: A case study on political domination in Ukraine”, Doctoral dissertation, defended on 19.12.2018 at Institute for Development and Peace, University of Duisburg-Essen, forthcoming publication.

50 Stefes, op.cit., p.29

51 Ibidem

52 Interview with representative of civil society organization, 25 February 2019, Kharkiv

53 Interview with representative of civil society organization, 18 September 2018, Odesa

54 See <https://transparentcities.in.ua/en/rejtingi-prozorosti-mist/kartki-mist>



corruption activism is the organizational capacity of those involved in the activism. As noted in Freedom House's 2018 Nations in Transit report for Ukraine, there is a large discrepancy in the country between the capacity of civil society organizations at the national and regional/local level.<sup>55</sup> Civil society organizations outside Kyiv receive grants from foreign donors less often than Kyiv-based organizations and often possess weaker fundraising skills. They also face the challenge of staff turnover and brain drain, as successful CSO representatives from small towns often relocate to regional capital cities (whether or not to work for similar organizations) and successful CSO representatives from regional capital cities often relocate to Kyiv or move abroad. Given also that salaries in the third sector are often not competitive with those in the private sector, even well-developed civil society organizations tend to be on a constant hunt for competent analysts, experts, communication managers, et cetera.

Anti-corruption organizations working outside Kyiv invariably rely on a small group of activists and in a significant number of cases on the dedication of one individual. Some organizations have a few, and rarely more than five people on the payroll, often in short-term or part-time employment. The personnel composition of organizations with hired employees tends to frequently change and is typically dependent on the obtainment of grants from Western donors. Organizations that are formally registered as non-governmental organizations have members, but membership is usually only a formal element of their status as a registered organization and does not have practical significance. Many organizations boast having a number of volunteers, in most cases between one dozen and several dozen, but the extent to which these volunteers are substantially active for the organizations seems limited. These findings seem to corroborate the long-established diagnosis of low levels of activity in civil society organizations in post-Soviet Ukraine. According to recent sociological research, 60% of citizens argue that civic organizations have an important role to play in their communities, but only 7% of people are

involved in civic activism.<sup>56</sup> Because they rely on a small number of hired employees, active members, and volunteers, the anti-corruption organizations often lack certain knowledge and professional skills required for effective activism. Sixty organizations in our dataset explicitly mention a lack of human resources as a reason for why they are not more effective.

While anti-corruption organizations operating outside Kyiv are similar in that they rely on a small number of activists and volunteers, they are diverse in the amount of funding with which they carry out their work. Many organizations lack any financial resources besides voluntary contributions of core activists. A small number of organizations reports receiving contributions from sympathizers outside the organization. Membership fees apply to few organizations and are insignificant where they do apply. 87 organizations in our dataset explicitly mention insufficient funding as a reason for why they do not work more effectively. The problem of insufficient funding reaches beyond anti-corruption organizations, and is noted in the 2018 USAID Civil Society Sustainability Index as the weakest point in the sustainability of civil society organizations in Ukraine.<sup>57</sup> Of the anti-corruption organizations in our dataset which have sources of funding beyond contributions of their own activists, almost all funding comes in the form of grants from international organizations and Western governments such as UNDP, the Renaissance Fund, USAID, and grant programs of national embassies in Ukraine. 103 organizations (43%) have indicated in interviews conducted for this study that they currently receive one or more grants or have received one or more grants in the recent past. Most such grants, however, are small and short-term and therefore do not allow to hire

55 See <https://freedomhouse.org/report/nations-transit/2018/ukraine>. Accessed 20 November 2018

56 Ilko Kucheriv Democratic Initiatives Foundation, "Hromadyanske suspilstvo v Ukrayini: vyklyky i zavdannya", retrieved at <https://dif.org.ua/article/gromadyanske-suspilstvo-v-ukraini-viklyki-i-zavdannya>. By comparison, the percentage of people involved in civil society organizations in Poland, for instance, is 20%. See "2016 Report on the State of Civil Society in the EU and Russia", p.80, retrieved at [https://eu-russia-csf.org/fileadmin/State\\_of\\_Civil\\_Society\\_Report/18\\_05\\_2017\\_RU-EU\\_Report\\_spaudai\\_Hyperlink\\_Spread.pdf](https://eu-russia-csf.org/fileadmin/State_of_Civil_Society_Report/18_05_2017_RU-EU_Report_spaudai_Hyperlink_Spread.pdf)

57 The Index also notes that the amount of external funding for civil society organizations working on issues such as citizen engagement, regional development, and the fight against corruption has recently increased, see <https://www.fhi360.org/sites/default/files/media/documents/resource-civil-society-organization-2017-regional-report.PDF>, p.223. Accessed 2 November 2018

a core staff and compete with salaries in other sectors. The lack of alternative sources of funding moreover has negative implications for the sustainability of anti-corruption activism: once a grant expires, the activism in most cases is interrupted.

The focus of donors on small and short-term projects in the regions of Ukraine often leads to a situation in which individual activists move from organizations to organizations depending on which of them at a particular moment has the funds to implement a certain project. As a result, civil society organizations working on anti-corruption do not develop institutionally and do not become well-known and respected local stakeholders. We argue therefore that a greater portion of donor support to anti-corruption organizations should be aimed at institutional development, and that supporting individual project activities is only likely to be effective when they are implemented by well-established organizations with already strong professional and organizational capacity.

It should be noted that some civil society organizations working on anti-corruption, including with strong capacity, have no interest in receiving or applying for foreign grants. Studies of anti-corruption activism suggest that locally originating grassroots initiatives, building on existing social capital, tend to have higher success rates than initiatives without grassroots. Among anti-corruption organizations in the regions of Ukraine that do not receive external funding, some clearly have a genuine grassroots base that helps them to create impact. An organization from Mariupol consisting of workers from one of the city's major enterprises, for instance, has been effective in uncovering corruption at the enterprise and raising awareness about the corruption.<sup>58</sup> In another example, an organization from Ternopil which was established by local fishermen and which focuses on the issue of poaching and other forms of illegal use of water bodies, has won a number of court cases.<sup>59</sup> And in Dnipro, a grassroots organization that focuses on

corruption related to road safety receives much appraisal for its awareness-raising efforts and has been successful in holding corrupt actors to account.<sup>60</sup> What these grassroots initiatives have in common is a clear focus related to the personal or professional background of their activists. This background provides them with an intimate knowledge of the issues that they address through their anti-corruption activism. Because they share a set of interests with a more or less clearly defined group of people, moreover, these activists are also relatively successful in mobilizing others. What this type of activists also has in common is that they do not receive external funding. In some cases this may be because they are opposed to the concept of foreign assistance to civil society organizations, or because they fear being viewed as 'grant-eaters' when they would receive foreign funding. In other cases, activists from organizations with a grassroots base do not possess the professional skills to apply for foreign funding. While the grassroots nature of these organizations strengthens their ability to create impact, their lack of material capacity impedes their effectiveness. Without the type of funding that grants provide, grassroots organizations have, for instance, fewer resources to employ people, hire consultants, pay legal fees, or print newspapers. The grassroots nature of these organizations therefore is often at the same time a strength and obstacle.

A relatively small but significant number of organizations in our dataset receive (or have received) a grant for institutional development, i.e. a grant not tied to a particular activity, or several grants at one time. Some twenty-five of these organizations have developed into organizations with high professional and organizational capacity thanks to international support. This means, among other things, that their activity is not directly contingent on obtaining yet another small grant. Our data suggest that a substantial amount of foreign funding is an important determinant of effectiveness. Multiple grants or large grants do not yet make recipient organizations wealthy, but they do allow these organization to employ several people and plan activities beyond their

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58 Interview with representative of civil society organization, 4 October 2018, Mariupol

59 Interview with representative of civil society organization, 20 November 2018, Ternopil

60 Interview with representative of civil society organization, 3 September 2018, Dnipro



current grants. Institutional grants in particular enable these organizations to allot time to fundraising. Most organizations with little funding are forced to focus on one type of activity or on corruption in one particular area. The organizations with multiple grants or a large institutional grant, by contrast, tend to pursue a multipronged approach employing diverse methods of activism and addressing more than one type of corruption. While many organizations with weaker financial capacity can point to one or two examples of impact, one organization from Kharkiv with substantial funding, for instance, within only a few years has won a range of court cases, has successfully advocated a new procurement policy at the regional administration, and has secured the annulment of many tenders.<sup>61</sup> In addition to this, the (social) media presence of the organization suggests that it is highly successful in raising awareness about corruption in the city and the region. A similar organization from Dnipro has equally won a range of court cases and, according to its own claims, has secured the annulment of procurements worth 500 million hryvnias.<sup>62</sup>

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61 Interview with representative of civil society organization, 11 June 2018, Kharkiv

62 Interview with representative of civil society organization, 3 September 2018, Dnipro

## PART II



### CHERKASY REGION

#### a. About anti-corruption activities

A total number of seven organisations are focusing on anti-corruption activities: five operating in Cherkasy, one in Korsun-Shevchenkivskiy, and one in Monastyrshche. A review of empirical studies suggests that the activities of anti-corruption civil society organizations in this region include monitoring, reporting and awareness-raising. While one organization is currently involved in public governance alongside local government authorities (co-governance), an organization from Cherkasy was invited by local authorities to take part in an attestation commission for hiring new police officers. The majority of interlocutors from regional anti-corruption organisations in Cherkasy emphasize that lack a specific focus in their anti-corruption activities. In fact, there are no anti-corruption organisations which have a real impact on anti-corruption public policy in the region. However, there are some success stories, such as an organization from Cherkasy focusing on corruption in law enforcement whose activism has led to the resignation of several law enforcement officers. Based on the following criteria: the level of institutional development and sustainability of anti-corruption CSOs; the number of successful anti-corruption initiatives which have had a positive effect on anti-corruption policies in the region and the number

of anti-corruption CSOs at the regional level including in small towns, the general impact rating of local anti-corruption CSOs in Cherkasy region is deemed to be low.

#### b. Local context

While the extent of political will on the part of the city and the regional administration to counteract corruption is low. However, There is political instability and fragmentation of the ruling elite in Cherkasy. Corruption remains systemic, but it lacks central oversight. Several pyramids of corruption exist side by side, depriving the political leadership of being the exclusive beneficiary of illicit activities taking place under its watch. Activists point out the existence of at least two competing pyramids in municipalities of Cherkasy. Therefore, there is a decentralized system of corruption in Cherkasy. A decentralized system of corruption fosters success of anti-corruption activism in two ways: anti-corruption is a useful tool to selectively discredit opponents and at the same time to develop a positive public image. Our interlocutors correspondingly argue that competition between several pyramids opens the door for anti-corruption.

#### c. Which types of activities should be supported?

- Supporting projects envisaging the increasing citizen awareness and engagement in civic activities.
- Supporting projects envisaging the engagement of local authority representatives and CSOs on the basis of equal partnership.
- Financing projects envisaging the development of the professional capacities of local non-governmental organisations. In particular training should be focused on fundraising strategies, the preparation and communication of analytical material, advocacy campaigns on the regional and local level, personal security etc.



Chernihiv

## **CHERNIHIV REGION**

### **a. About anti-corruption activities**

Although there are only six anti-corruption organisations in the region (five in Chernihiv and one in Nizhyn), the CSOs are engaged in a wide range of activities: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance. Many CSOs describe themselves as multi-functional. They fight against corruption in the following areas: public procurement, public transport, JSC «Ukrainian Railways», the State Customs Service etc. According to the empirical data, the most common activity is monitoring decisions made by local government and advocacy campaigns. These efforts are usually aimed at encouraging the adoption of policies by relevant authorities related to increasing transparency in public administration or the introduction of integrity mechanisms. For instance, activists have been included in a working group that has drafted a new set of anti-corruption regulations. Some of the CSOs have strong professional capacities, yet they lack sufficient financial and human resource capacity to be effective. Without sufficient funding, anti-corruption organizations cannot hire necessary staff and services, and have fewer opportunities to acquire knowledge and skills which could increase the effectiveness of their work. Therefore, based on the following criteria: the level of institutional development and sustainability of anti-corruption CSOs; the number of successful anti-corruption initiatives which have had a positive effect on anti-

corruption policies in the region and the number of anti-corruption CSOs at the regional level including in small towns, the general impact rating of local anti-corruption CSOs in Chernihiv region is deemed to be low.

### **b. Local context**

The extent of political will on the part of the city and the regional administration to counteract corruption is low. According to our interlocutors, the organizations have a non-confrontational attitude toward the authorities, yet local government rarely takes CSOs' proposals of anti-corruption policies into consideration. There is some cooperation with certain deputies. Deputies publicly support activists' proposals, however they very often ultimately make the opposite decision.

Chernihiv is a clear example of a centralized system of corruption, according to our interlocutors in the region, with a dominant role for one actor who is able to co-opt other actors. Corruption in the agricultural and forestry sectors, in particular illegal logging is the most prevalent form of corruption in the region.

### **c. Which types of activities should be supported?**

- Supporting the institutional development of local anti-corruption coalitions.
- Supporting projects envisaging the engagement of local authority representatives and CSOs on the basis of equal partnership.
- Financing projects focusing on preventing corruption in the agricultural and forestry sectors.
- Providing institutional support for anti-corruption organisations which have success stories and development potential.
- Providing direct financing to local organisations for project implementation.
- Financing projects focusing on developing independent media in the region.



## **CHERNIVTSI REGION**

### **a. About anti-corruption activities**

A total number of six organisations are focusing on anti-corruption activities in Chernivtsi. The two main focuses of anti-corruption Civil Society Organizations in this region are monitoring and reporting, in particular of public procurement and asset declarations. Although organisations lack substantial institutional and professional capacities and only one organisation has donor support, this does not mean that the organisations are ineffective. Our interlocutors emphasized significant success in cancelling illegal tenders. Likewise, one organization from Chernivtsi investigated the involvement of the State Customs Service in smuggling in the region and widely disseminated its findings in the local media. However, the sustainability of such organisations is undermined by their low institutional development, meaning they cannot operate in a systematic manner. Therefore, the general impact rating of local anti-corruption CSOs in the Chernivtsi region is still low.

### **b. Local context**

On the one hand, the willingness of the authorities to answer requests for information, to publish open data and implement tools of e-governance demonstrate some political will to fight corruption. On the other hand, reporting by several activists about pressure from the authorities, especially in cases where investigations touch upon corrupt public

procurement and control over natural resources contradicts this image. In fact there exists a decentralized system of corruption which operates under conditions of political instability and fragmentation of the ruling elite. There are at least two competing pyramids in Chernivtsi's municipalities. Informal competition for control of resources results in formal political pluralism and indicates democratic tendencies; however these tendencies are mostly deceptive. For instance, while there is media pluralism, there is no independent press. Each informal interest group controls media resources which they use for political advertisements before elections. Hence there is definitely some political will in the region to fight corruption, yet this remains at a low level.

### **c. Which types of activities should be supported?**

- Providing institutional support for anti-corruption organisations which have success stories and development potential.
- Providing direct financing to local organisations for project implementation.
- Financing projects focusing on developing independent media in the region.
- Financing projects envisioning the training of activists regarding personal security.
- Supporting projects which increase citizen awareness and engagement in civic activities
- Supporting projects envisioning reducing opportunities for corrupt exploitation of natural resources



## **DNIPROPETROVSK REGION**

### **a. About anti-corruption activities**

The level of activity of civil society organisations in the Dnipropetrovsk Region is high. A total number of 26 organisations are focusing on anti-corruption activities: 16 operating in Dnipro, 5 in Kryvyi Rih, 4 in Nikopol, and one in Marhanets. 65 % of Anti-corruption organisations in the region do not receive donor support.

#### **Dnipro**

The vast majority of organisations in Dnipro are carrying out a watchdog function. Some interlocutors state that anti-corruption activists can to some degree engender good governance among local and regional authorities solely through their watchdog function. Although the impact is difficult to measure, there are some concrete examples. One organisation has prevented the illegal deforestation, another has won a range of court cases and claims it has secured the annulment of procurements worth 500 million hryvnias. Other typical activities include the monitoring of electronic asset declarations of public officials, typically with the aim to identify inconsistencies between the stated income and assets of officials and their actual wealth. Another organization monitors the asset declarations of the leadership of the regional branch of the State Highways Agency of Ukraine. After the organization found a number of inconsistencies in declarations, the relevant officials were forced to enter corrections. While

14 organizations act as watchdogs, one focuses on advocacy, especially impressive examples including the adoption by the city council of a set of anti-corruption regulations which were drafted and proposed by activists. A grassroots organization which focuses on corruption related to road safety receives much appraisal for its awareness-raising efforts and has been successful in holding corrupt actors to account. What these grassroots initiatives have in common is a clear focus related to the personal or professional background of their activists. This background provides them with an intimate knowledge of the issues which they address through their anti-corruption activism. Because they share a set of interests with a more or less clearly defined group of people, moreover, these activists are also relatively successful in mobilizing others. However, another thing they have in common is that they do not receive external funding. While the grassroots nature of these organizations strengthens their ability to create impact, their lack of material capacity impedes their effectiveness. Without grant funding, grassroots organizations in Dnipro as well as other regions have, for instance, fewer resources to employ people, hire consultants, pay legal fees, or print newspapers.

#### **Kryvyi Rih**

A total number of 5 organisations are focusing on anti-corruption activities in Kryvyi Rih. CSOs are engaged in the following activities: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance. There are two organisations with developed professional capacities which fight against corruption: one in the education sector, another in the environmental sector. While these CSOs have strong professional capacities, they nonetheless lack sufficient financial and human resource capacity to be more effective. Likewise, one grassroots organization focused on advocacy and co-governance in Kryvyi Rih secured the adoption of some decisions aimed at increasing the openness and accountability of the local council. While three CSOs already mentioned focus on eradicating the causes of corruption, two other organizations use direct action as their main type of activities. The most common form

of direct action is organizing demonstrations. While such demonstrations are usually peaceful gatherings, some groups, often led by (radical) nationalists or veterans from the conflict in Eastern Ukraine, employ coercive methods to achieve their goals. For example, activists have seized and destroyed illegal alcohol sold in stores which were protected by local authorities. The general impact rating of local anti-corruption CSOs in Kryvyi Rih region is deemed to be medium.

### **Nikopol**

All anti-corruption CSOs in Nikopol are grassroots initiatives which carry out watchdog functions. None of them receives donor support. They have a low level of institutional development and professional capacities, yet this does not mean that they are not effective in their activities. They have success stories in corruption prevention and actively contribute to increasing the transparency of local authorities, despite their low organisational development and absence of any donor support. However, the sustainability of their operations is undermined by their low institutional development.

### **b. Local context**

The extent of political will in the regional administration to counteract corruption is higher than at the local authority level in towns and cities. Our interlocutors explain the higher political will in the Dnipro region by the absence of central oversight at the regional level in contrast to the municipal level. The local context is distinctive in different cities and towns of the region. Equally negative assessments of political will with few exceptions were given in Dnipro, where 14 organizations have a confrontational attitude toward the authorities and local government rarely adopts CSOs' proposals for anti-corruption policies. Kryvyi Rih has its own local context determined by the local economy. Its economy is closely interwoven with large enterprises, and local politicians are highly dependent on big business. As a consequence, neither political nor economic competition exists in the city, and most local media is owned by one business group. Local activists describe it as a paternalistic system. The connection between

the owners of large steel and mining plants and local authorities has strong negative consequences for the environment in Kryvyi Rih. According to our interlocutors, the local government does not react to any violation of environmental legislation concerning air, water and land pollution. The representatives of CSOs state that the consequence of corruption in Kryvyi Rih is a substantial ecological disaster. Political will is absent in Nikopol, where a lack of action and enforcement among local political authorities forces many organizations to deploy confrontational tactics, including demonstrations, direct action and public pressure.

Therefore, based on the following criteria: the level of institutional development and sustainability of anti-corruption CSOs; the number of successful anti-corruption initiatives which have had a positive effect on anti-corruption policies in the region and the number of anti-corruption CSOs at the regional level including in small towns, the general impact rating of local anti-corruption CSOs in Dnipropetrovsk Region is deemed to be medium.

### **c. Which types of activities should be supported?**

#### **Dnipro**

- Supporting think tanks focus on the research on corruption and anti-corruption.
- To support project activities envisaging engagement of the representatives of local authorities and CSOs on the basis of equal partnership.
- Institutional support of the classical grassroots initiatives who have their success stories and development potential.
- Financing projects of local organisations with low institutional development through regional organisations with high institutional and professional capacities. To encourage building of partnerships between such organisation.



## **Kryvyi Rih**

- Providing institutional support of local CSOs which focusing on counteraction of corruption in the environment field
- Financing projects focusing on developing independent media in the region.
- Providing direct financing to local organisations for project implementation.
- Supporting the institutional development of local anti-corruption coalitions.
- To ensure that the projects envisaging cooperation between local and national non-governmental organisations comprise the following components: (a) direct financing of the implementation of project activities to be provided to the local organisations; (b) mentor support from the partner organisation of the national level concerning the administration of such projects.
- To finance the projects envisaging development of professional capacities of local non-governmental organisations, in particular, training on fundraising, preparation of analytics and their further communication, advocacy campaigning on regional and local level, personal security etc.

## **Nikopol, Marhanets**

- To finance the projects envisaging development of professional capacities of local non-governmental organisations, in particular, training on fundraising, preparation of analytics and their further communication, advocacy campaigning on regional and local level, personal security etc.
- Institutional support of the classical grassroots initiatives who have their success stories and development potential.
- Seminars and webinars on grant applications preparation for regional and local CSOs.





## **DONETSK REGION**

### **a. About anti-corruption activities**

Anti-corruption is not a top priority for communities in the Donetsk region. While the total number of CSOs working in the anti-corruption field is 20, there is nonetheless only one CSO possessing strong professional and organizational capacity which is based in Druzhkivka. Other CSOs operate in the following cities and towns: Mariupol - 7, Bakhmut - 1, Kramatorsk - 4, Sviatohirsk - 1, Sloviansk - 6. The centre of anti-corruption activity in the Donetsk region - Druzhkivka - is a small town. In Sloviansk, there are few active CSOs working in the anti-corruption field, and even they have low organizational and professional capacities. Activists explain that there is scarce interest in the fight against corruption due to the lack of political will of local authorities to counteract corruption. Likewise, we found a widely shared opinion among activists that corrupt practices are not always evil. There are no investigative journalism organisations or independent local media which focus on corruption investigations.

### **b. Local context**

There is a lack of political will to reduce corruption in the region, which is characterized by a high degree of informality and patron-client relationships, and a centralized system of corruption. Currently, Mariupol is the centre of the Donetsk region. In 2019 it was ranked as the second most transparent city in Ukraine.

Moreover, our research showed that corruption linked to the disposal of land plots or public procurement is rather an exception than the rule; this phenomenon is almost absent in Mariupol, unlike other cities such as Kharkiv, Odesa and Dnipro. Accordingly, support for projects aimed at preventing corruption in public procurement and increasing transparency, is not as much of an acute priority for the Mariupol community as it is for other Ukrainian cities. However, this does not make Mariupol a leader in the implementation of anti-corruption reforms at the local level in Ukraine. Mariupol is a monofunctional city, where the principal industry belongs to a sole owner, who is the most influential Ukrainian entrepreneur. This has created favourable conditions for the monopolisation of local power and local media and, accordingly, an advantageous situation for corruption of a different type. In particular, control over the local council guarantees that any decisions will be in the best interests or for the direct benefit of Metinvest. This simultaneously leads to direct and indirect losses for the local budget. For instance, each year the enterprises receive land tax benefits through which the local budget loses 30 to 40 million UAH. It is exactly the monopolisation of local power which causes a lack of political will to oblige the PJSC "AZOVSTAL Iron and Steel Works" to take measures for the modernisation of production in order to reduce air pollution. According to the Ministry of Ecology of Ukraine, the enterprises of the PJSC "AZOVSTAL Iron and Steel Works" are within the Top-100 of the most polluting enterprises. In the meantime, the monopolisation of the media market in Mariupol has created significant difficulties for activists in informing the city community on urgent problems. As a consequence, neither political nor economic competition exists in the city, and most local media is owned by one business group. Local activists describe it as a paternalistic system. While high transparency in combination with high state capture seems a contradiction, this example echoes critical voices in the literature on transparency and accountability, which argue that transparency is not necessarily an indicator of accountability or democratic deliberation. Unchallenged political leadership is not only able but also

interested in enforcing anti-corruption measures in low-level public administration, while at the same time access to the distribution of public resources at the high political level remains uncontested. Accordingly, support to projects aimed at preventing corruption in public procurement and increasing transparency is not as acutely necessary for the Mariupol community as it is for other Ukrainian cities; however other CSOs' anti-corruption activities need to be supported.

In the Donetsk region, the local context is also determined by the perception of the importance of anti-corruption by active representatives of the local community. For instance, there are locations where anti-corruption CSOs are very strong and active. They constantly engage in investigative journalism, monitor conflicts of interests, appeal against actions and decisions of the local councils and take part in the introduction of local level anti-corruption programmes. In the meantime, other locations, while bigger in size and population and situated only a few kilometres away demonstrate a very low level of anti-corruption activity. One of the most remarkable examples is that of Druzhkivka and Sloviansk, two towns in the Donetsk region situated 30 kilometres apart. A strong anti-corruption organisation operating in Druzhkivka succeeded in uniting local activists and CSOs, increasing local community engagement and achieving significant success in corruption prevention. In the meantime, the representatives of strong non-governmental organisations in Sloviansk explain their lack of interest in systematic work in this area by pointing to the lack of popularity among the local inhabitants of the idea of fighting corruption. The Mayor and the majority of deputies of the City Council (26 out of 36 deputies) hold pro-Russian sympathies and belong to the Opposition Bloc (22 persons) and Our Land (Наш край) (4 persons), and are successors to the Party of Regions. This is the main cause of confrontation between pro-Ukrainian anti-corruption activists and deputies, since activists do not believe that the local authority has any political will to counteract corruption. The part of the challenge of collaborating with the local authorities is a difference in values and beliefs. The police and

Prosecutor's Office are connected with local economic elites, criminals and the local authorities. However, local courts are quite independent. Sloviansk displays low economic development in which political and economic power belongs to pre-revolutionary elites. Civil society in Sloviansk requires support for anti-corruption education in order to engage the local community in fighting corruption.

### **c. Which types of activities should be supported?**

#### **Mariupol:**

- Financing projects focusing on developing independent media in the region.
- Providing institutional support of local CSOs which focusing on counteraction of corruption in the environment field
- Providing direct financing to local organisations for project implementation.
- Supporting project activities envisaging the development of small entrepreneurial projects in Mariupol
- Supporting the institutional development of local anti-corruption coalitions.
- Supporting projects envisaging increasing citizen awareness and engagement in civic activities

#### **Bakhmut, Kramatorsk, Sviatohirsk, Sloviansk:**

- Supporting projects envisaging increasing citizen awareness and engagement in civic activities
- Supporting the institutional development of local anti-corruption coalitions to be coordinated by the Druzhkivka CSO



## **KHARKIV REGION**

### **a. About anti-corruption activities**

There are 13 anti-corruption organizations in Kharkiv region (particularly 11 in Kharkiv, 1 in Izum, 1 in Chuhuiv). The CSOs are engaged in a wide range of activities: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance. The most common forms of direct action by these organizations are lawsuits against corrupt individuals and organizing demonstrations. Demonstrations organized by anti-corruption activists most commonly take place in front of the city administration or the city council. While such demonstrations are usually peaceful gatherings, some groups, often led by (radical) nationalists or veterans from the conflict in the country's East, employ coercive methods to achieve their goals. For example, activists directly confronted the proprietors of an illegal gas station in the city forcing them to close their business. A majority of interlocutors from Kharkiv regional anti-corruption organizations emphasize that they have difficulty creating substantial impact. Among the reasons for their limited effectiveness they most often mention a lack of financial and human resources, passivity among the public, and intimidation from the side of the authorities or others. Likewise, representatives mention intimidation as a factor that limits the effectiveness of their work. While many organizations with weaker financial capacity can point to one or two examples of impact, one organization from Kharkiv with substantial

funding, for instance, within only a few years has won a range of court cases, has successfully advocated a new procurement policy at the regional administration and has secured the annulment of many tenders. Less common are examples of ex-ante anti-corruption effects. Interlocutors have mentioned cases in which legislation or regulations have been adopted or amended with the goal to prevent corruption and as a result of their efforts. For example, activists have been successful in persuading the local authorities to lower the threshold for the use of the electronic procurement system ProZorro. Threats are another challenge for activists of the anti-corruption organizations. In Kharkiv, the activists recounted how they have been physically attacked by unknown or known assailants. More common than physical violence are verbal threats. While the impact of these forms of intimidation cannot be measured, it is likely that it keeps some people away from working on anti-corruption, and that many of those who do work on anti-corruption take fewer risks than they would otherwise.

### **b. Local context**

The legislative and institutional environment for civil society organizations in Kharkiv is largely similar all across Ukraine as they are subject to the same national legislation and interact with the same types of subnational state institutions and institutions of self-government. However, there is great variation across Ukraine in the extent of political will on the part of local and regional authorities to address corruption. In Kharkiv political will is lacking because politics has been dominated by one group for a considerable period of time. However, it shows to a greater extent at the regional level. For example, an anti-corruption organization has found it difficult to reach an understanding with city authorities but has been able to conclude a memorandum of cooperation with the Kharkiv regional council. These findings raise the question of why there are successful anti-corruption CSOs in the face of minimal political will of local authorities. This question requires a better understanding of the model of interaction between anti-corruption CSOs and local authorities. The activists report that despite

immense progress in the legislation, there are challenges in the enforcement of transparency in the region. Our interlocutors report that frequently authorities provide incomplete information or low-quality information or provide it with delay. Often these obstacles point at a lack of professionalism on the part of authorities, sometimes however they go hand in hand with purposeful closure of authorities to avoid public scrutiny. If authorities deny answers to the information requests, they are considered closed authorities. Kharkiv region is the region where authorities are non-transparent as well as have the low political will to fight corruption. In such situation with closed authorities local anti-corruption activists frequently display the ambition to become active in political parties or develop new political parties in order to enter the local council and renew the political elite. Especially in such cities as Kharkiv, Poltava and many other cities.

### **c. Which types of activities should be supported?**

- Supporting projects envisaging the engagement of local authority representatives and CSOs on the basis of equal partnership.
- Project activities of local organisations with low institutional development should be financed through regional organisations with high institutional and professional capacities. Partnerships building between such organisations should be encouraged.
- Financing the projects envisaging development of professional capacities of local non-governmental organisations, in particular, training on fundraising, preparation of analytics and their further communication, advocacy campaigning on regional and local level, personal security etc.



## **KHERSON REGION**

### **a. About anti-corruption activities**

There are 16 organisations in the Kherson region specialised in anti-corruption: 15 concentrated in Kherson city and one focusing on the village of Kozachi Lageri. Kherson's organisations are sufficiently strong and focus their activities on monitoring and accountability (14 organisations), awareness raising (7), advocacy (4), direct action campaigns (8), developing expert competencies and cooperating with local government organs (3). At the city-level there is an informal coalition of anti-corruption organisations, which has assisted with successful advocacy for some anti-corruption measures, including regarding the threshold for procurement (this provision was in force for 9 months before being repealed). The coalition helped with the introduction of amendments to the regulations of the Regional Council, which secured guarantees of openness in their activities, and a requirement that the City Council ensures that contracted providers of public transport improve the quality of services, as well as provisions on control of the use and planning of the city budget.

The representatives of some powerful anti-corruption organisations are members of the public accountability council under the mayor of the city. The main spheres of anti-corruption activity of civic activists are overcoming corruption in passenger transportation, disposing of budgetary funds and communal property, monitoring the lifestyles and declarations of

local authorities, and identifying conflicts of interest. They organise the education of activists and representatives of local government in small towns of the region. The main challenge for the stable operation of organizations is financial stability, given that the same experts are often representatives of several organizations, which presents a challenge for developing the competencies of organizations. Overall, the development of anti-corruption organizations in the region is moderate.

### **b. Local context:**

There is no single center of economic and political influence in the region, and there is a struggle for influence and resources, both at the city and regional level. The city does not possess considerable resources, however it nonetheless remains an object of contestation for influence. Information received from activists and open sources makes it possible to conclude that criminal groups in the region are actively used in the struggle for establishing control over different areas of the city, which is financed from the budget. On several occasions activists and journalists were victims of assault or received threats sent to their address. It is important to emphasize that thanks to the Crisis Center information platform, activists have the opportunity to communicate with the journalist community and communicate their position to community residents.

### **c. Which types of activities should be supported**

- Supporting the institutional development of the local anti-corruption coalition
- Supporting projects which foresee the involvement of local authorities and CSOs on the basis of equal partnership, in particular in areas such as passenger transportation, the provision of medical services, and improvement of the city's anti-corruption policies.
- Supporting projects involving the development of the professional competencies of local civic organisations, in particular teaching about fundraising, analytical skills and communication, advocacy campaigns at the regional and local level, personal security etc.



## ZHYTOMYR

### a. About anti-corruption activities

There are 7 organisations in the Zhytomyr region where fighting corruption is one of their areas of activity. The organisations rarely cooperate with one another and have little influence on the conduct of anti-corruption reform on the local level. In fact, 2 out of 7 organizations are not local organizations, but local branches of organisations based in Kyiv, and none of the 5 Zhytomyr organizations receive donor assistance. They operate at the expense of their members, which is why they have a constant lack of resources to carry out systematic activities.

### b. Local context

Although most representatives of anti-corruption organizations pointed out that there is no political will to fight corruption at either the local or regional level, the TI Ukraine transparency rating and analysis of the political structure of the city and regional council, and other data on the region, does not indicate a lack of political will to fight corruption or the absence of powerful CSOs which could form this political will and be perceived as stakeholders who are interested in specific developments in anti-corruption reforms.

### c. Which types of activities should be supported

- Institutional support for anti-corruption organisations at the local and regional level which display a low level of development, yet which nevertheless have success stories and development potential.
- Supporting projects envisaging the engagement of representatives of local authorities and CSOs on the basis of equal partnership.
- Projects envisaging cooperation between local and national non-governmental organisations should comprise the following:
  - a. direct financing of the implementation of projects
  - b. mentor support from the partner organisation at the national level concerning the administration of such projects
- Supporting projects involving the development of the professional competencies of local civic organisations, in particular teaching about fundraising, analytical skills and communication, advocacy campaigns at the regional and local level etc.





## MYKOLAIV REGION

### a. About anti-corruption activities

In the Mykolaiv region there are 11 organisations, mostly are the classical grassroots initiatives, concentrated in Mykolaiv city. Most act as watchdog organizations that monitor health care system, public transportation, budget, a majority of interlocutors from regional anti-corruption organizations emphasize that they have difficulty creating substantial impact. Insufficient financing as the main challenges in their activities. Likewise, the reasons for their limited effectiveness they most often mention a human resources. Our respondents gave the following principal reasons for such situation:

- (1) lack of fundraising skills;
- (2) lack of readiness of average individuals to make money contributions for the operation of anti-corruption CSOs;
- (3) impossibility to accept contributions from the big business representatives because of the risks to be accused of advocating their interests;
- (4) lack of competences for preparing grant applications.

Another challenge is intimidation from the side of the authorities or others. The activists have recounted how they have been physically attacked by unknown assailants. More common than physical violence are verbal threats.

Nevertheless, this does not mean that the

organisations who have low level of institutional development and professional capacities are not effective in their activities. Organisations have their success stories of corruption prevention and actively contribute to the implementation of anti-corruption reforms at the regional and local levels, despite their low organisational development and absence of any financial donor support. The following examples of their achievements can be mentioned: quashing unlawful decisions of the local councils concerning land plots allocation or the decisions on public procurement conducted in breach of the anti-corruption legislation, preparation and active participation in the decision-making process strengthening transparency and accountability of the local authorities (subthreshold procurement, public audit of the local councils etc.), training, lectures and other events aimed at raising the community's awareness, bringing to stop illegal issuing of logging permits etc. One grassroots has been successful in cancelling payments for certain forms of treatment in the city's hospitals. However, the sustainability of the operation of such organisations is undermined by their low institutional development. What is more, due to this factor such organisations cannot operate in a systematic manner, turning into professional non-governmental organisations capable of engaging professionals and consistently working to eliminate the causes for the corruption practices instead of fighting their consequences, being stakeholders respected enough to provide the local authorities with recommendations the latter will follow.

While one is a robust think tank which actively participates in preparing draft decisions aimed at increasing the openness and accountability of local councils, carrying out advocacy, and educating local government officials.

### b. Local context

The Mykolaiv region is a rather difficult region for anti-corruption activities of CSOs, since the main sectors of the economy, state and communal resources are still controlled by organized criminal groups, which journalists have previously linked to the former leadership of the Security Service of Ukraine (SBU). All of our respondents noted that during the first two years after the



revolution of dignity there was political will at the regional level in the fight against corruption; however, the main problem lies in the lack of engagement of law enforcement in this struggle. The previous leadership of the Mykolaiv branch of the Security Services of Ukraine (SSU) were connected economically and politically with the region's elite. However, in September 2019 a new head of the SBU was appointed and as of today it is difficult to draw conclusions as to whether there is any political will to fight corruption at the SSU level in the Mykolaiv region. In addition, given the geographical location of the region, another problem is the illegal use of natural resources in the 140 conservation sites which belong to the Mykolaiv Regional Nature Reserve Fund, as well as corresponding corrupt activities.

### **c. Which types of activities should be supported?**

- Institutional support of the classical grassroots initiatives who have their success stories and development potential.
- Seminars and webinars on grant applications preparation for regional and local CSOs.
- Financing projects of local organisations with low institutional development through regional organisations with high institutional and professional capacities. To encourage building of partnerships between such organisation.
- Supporting projects involving the development of the professional competencies of local civic organisations, in particular teaching about fundraising, analytical skills and communication, advocacy campaigns at the regional and local level, personal security etc.
- Mentor support from the partner organisation of the national level concerning the administration of such projects.



## RIVNE REGION

### a. About anti-corruption activities

The level of activity of civil society organisations in Rivne city is high: in total there are 7 active organisations involved in monitoring and reporting, awareness-raising, advocacy, direct action, capacity building, and co-governance. They are engaged in preventing and counteracting corruption in the spheres of public procurement, education, monitoring declarations, preventing conflicts of interest, increasing the transparency of local authorities and investigative journalism concerning the actions of officials, the use of budgetary funds and electoral corruption. All organizations are sufficiently robust in terms of professional skills, and some organizations have a high level of institutional development. In addition, each organisation possesses donor support. In terms of the main challenges of their activities, our respondents who carry out journalistic investigations cited a lack of resources and obstruction of their activities through illegal means. In one case, an organisation's office was subject to an arson attack in which one person was killed. Other respondents emphasised the low quality of professionalism and skills among city government officials, meaning there is a lack of partners to cooperate with to implement initiatives proposed by civic organizations. At the same time, our respondents saw that as a whole it is possible to build a dialogue between the authorities and civil society.

### c. Local context.

All of our respondents mentioned the existence of political will to fight corruption, yet at the same time drew attention to the fact that they have both cooperation and some confrontation with the authorities. Our research also found that civic activists face threats due to their anti-corruption activities, and accordingly, at the city level, some officials may be linked to criminal gangs. At the same time, it should be noted that the city possesses an active youth with understanding of the need to fight corruption. Corruption is decentralized: there is a struggle for influence and the distribution of resources in the city, and there is no single center of government.

### c. Which types of activities should be supported?

- Supporting projects envisaging the engagement of local authority representatives and CSOs on the basis of equal partnership.
- Financing projects envisaging the development of the professional capacities of local government officials, particularly anti-corruption educational programs.
- Supporting projects involving the development of the professional competencies of local civic organisations personal security etc.
- Supporting think tanks focus on the research on corruption and anti-corruption.



## **VOLYN REGION**

### **a. About anti-corruption activities**

In the Volyn Region there is an almost complete absence of civic initiatives aimed at preventing and fighting corruption. There are 4 organisations in Lutsk and one operating in Rozhyshche. One of the four organizations concerned is engaged in anti-corruption activities indirectly and is more of a think tank focusing on the preparation of professional political analysis and the training of political leaders. The three anti-corruption organizations are institutionally and professionally underdeveloped. They are exclusively involved in investigative journalism and appealing to the authorities. The main areas of corruption are in the forestry sector, property declarations, procurement, declaration monitoring and the creation of a communal real estate register. There are few examples of CSOs impact in Lutsk. For instance the creation of an integrity bureau at the city council in Lutsk. The organization working in Rozhyshche has almost ceased operations.

### **c. Local context.**

According to our research, Lutsk has the political will to fight corruption at the local level, and to a certain extent at the regional level. At the same time, the community of the region is not proactive in the fight against corruption. This is partly explained by the geographical location and economy of the region. In particular, the Volyn region is a border area and a large percentage of

residents are engaged in the informal economy or involved one way or another in the illegal trade in goods without proper customs clearance, or in the smuggling of contraband to neighboring countries.

### **c. Which types of activities should be supported?**

- Supporting projects envisaging the increasing citizen awareness and engagement in civic activities.
- Financing projects envisaging the development of the professional capacities of local non-governmental organisations. In particular training should be focused on fundraising strategies, the preparation and communication of analytical material, advocacy campaigns on the regional and local level, personal security etc.



## **IVANO-FRANKIVSK REGION**

### **a. About anti-corruption activities**

There are only three anti-corruption CSOs in Ivano-Frankivsk. However, two of these organizations are reasonably powerful and work in the following areas: anti-corruption education, monitoring the lifestyles of public officials, monitoring the activity of the courts, conducting investigations into corruption in public utilities, monitoring the budget process, analyzing deputies' e-declarations and monitoring public procurement. The result has been increased transparency and accountability of local government. Several concrete achievements have arisen from the work of these organisations, such as implementing procurement thresholds, a risk-management system in Kolomyia city council and an open budget system (including the budget of state-owned enterprises). Seven municipalities in the Ivano-Frankivsk region, for instance, adopted anti-corruption instruments, following training on integrity in public administration conducted by an organization from Ivano-Frankivsk. These anti-corruption organizations actively cooperate with organizations from other regions of Ukraine and with national level organizations; they are also trying to advocate their anti-corruption initiatives on the national level. Therefore, only two of these organizations wield major influence on anti-corruption reform on the regional level and engage in a wide range of activities, such as monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance. However, based on the criteria of

the level of institutional development and sustainability of anti-corruption CSOs, the number of successful anti-corruption initiatives which have had a positive effect on anti-corruption policies in the region and the number of anti-corruption CSOs at the regional level including in small towns, the general impact rating of local anti-corruption CSOs in Ivano-Frankivsk region is deemed to be low.

### **b. Local context**

Our interlocutors indicate that there are substantial differences in political will among authorities at the municipal and regional level. There is a relatively high level of political will at the regional level. Political will, of course, can fluctuate over time and sharply decrease or increase with the arrival of new leaders. The existence of political will can also be scattered, with some agencies of the government demonstrating a greater amount of political will than others. One factor which can explain this is political and economic pluralism. Our interlocutors also mentioned that while Ivano-Frankivsk became one of the most transparent cities according to Transparency International's assessment, there are critical fields such as construction and architecture which remain corrupt and inaccessible.

### **c. Which types of activities should be supported?**

- Financing the work of local organisations with low institutional development by regional organisations with high institutional and professional capacities and encouraging the creation of partnerships between such organisations.
- Financing projects envisaging the development of professional capacities of local non-governmental organisations, in particular, training concerning fundraising, preparation of analytical materials and their further communication, advocacy campaigning on the regional and local level, personal security etc.



## KHMELNYTSKYI REGION

### a. About anti-corruption activities

Five organizations are focusing on anti-corruption activities. These CSOs are engaged in a wide range of activities, including monitoring and reporting, awareness-raising, advocacy, direct action, capacity building and co-governance. Particularly, they monitor and expose corruption in the city and regional councils, monitor deputies' e-declarations and monitor public procurement. They also fight corruption in the education and health sectors and develop statutes for local government, such as those designed to prevent conflicts of interest. In addition they write and advocate decisions to be taken by the local council. In general, they work in Khmelnytskyi city and the wider region. Many organizations lack financial resources other than voluntary contributions from core activists. A small number of organizations report that they have received contributions from supporters outside their organizations. Membership fees exist in a few organizations, but the amount of money accumulated through those membership fees is insignificant. Only two CSOs have donor support, and only one donor organization provides support for anti-corruption organizations in the region. Nonetheless, these grassroots organizations have success stories in corruption prevention and actively contribute to the implementation of anti-corruption reforms, particularly in the education sector.

### b. Local context

The majority of organizations have a non-confrontational attitude toward the local authorities, and some of them serve as unpaid advisors to local government organs. However, according to activists the extent of political will at the city and regional level is low.

### c. Which types of activities should be supported?

- Providing institutional support for anti-corruption organisations which have success stories and development potential, particularly in the education sector.
- To organise seminars and webinars on grant applications preparation for regional and local CSOs.
- To finance project activities of local organisations with low institutional development through regional organisations with high institutional and professional capacities. To encourage building of partnerships between such organisations.
- To ensure that the projects envisaging cooperation between local and national non-governmental organisations comprise the following components: (a) direct financing of the implementation of project activities to be provided to the local organisations; (b) mentor support from the partner organisation of the national level concerning the administration of such projects.
- To support institutional development of local anti-corruption coalition.
- To finance the projects envisaging development of professional capacities of local non-governmental organisations, in particular, training on fundraising, preparation of analytics and their further communication, advocacy campaigning on regional and local level



## **SUMY REGION**

### **a. About anti-corruption activities**

A total number of twelve organizations are focusing on anti-corruption activities in Sumy. The main focuses of anti-corruption organizations in this region are monitoring and reporting, in particular of public procurement and asset declarations. There is also think tank that focuses in anti-corruption research. Although organizations lack substantial institutional and professional capacities, they succeeded in increasing citizen awareness and engagement in civic activities in the region. Another positive example of CSOs anti-corruption activities is improvements in the local judiciary, particularly three judges being dismissed because of corruption. The main challenge a CSOs faces is threat, one activist was killed two years ago because his anti-corruption activities, some have been physically attacked, more common are verbal threats. They also face the challenge of staff turn-over. The representatives of institutionally developed organizations state that it very often happens that well-prepared young professionals move to work in bigger cities, such as Kharkiv, Kyiv, when they receive work experience in CSOs. So, CSOs in Sumy looks for competent staff, particularly, analysts, experts, communication managers etc.

### **b. Local context**

The extent of political will on the part of the city administration as well as of the regional administration to counteract corruption is low.

### **c. Which types of activities should be supported?**

- To include into the programmes aimed at supporting civil society in promoting anti-corruption reforms a component of institutional support of anti-corruption organisations of local and regional level of low organisational development level but who nevertheless have their success stories and development potential.



## KIROVOGRAD REGION

### a. About anti-corruption activities

Nine CSOs focus on anti-corruption activities, with all organizations having a high impact on implementing anti-corruption reforms. They work in the following areas: conducting qualitative monitoring of city council decisions; gathering information on corruption and corruption risks; initiating the drafting of proposals for the city council; implementing civic educational activities to engage citizens; preventing corruption in the disposal of communal property and land; fighting corruption in the educational sphere and conducting journalistic investigations. On the whole, the organizations are involved in monitoring and reporting of corruption, awareness-raising, advocacy, direct action, capacity-building and co-governance. However, grassroots organizations also have some impact; for instance, anti-corruption activists have been successful in forcing the dismissal of local officials in charge of public utilities

### b. Local context

While the political will to fight corruption is relatively low in the region, activists reported that improvements in the local judiciary has been an important success of local CSOs. One CSO in Kropyvnytskyi noted that the courts are the only operational institutions. There is a decentralized system of corruption, meaning that corruption remains systemic, but lacks central oversight.

Activists point to the existence of at least two competing pyramids in municipalities of Cherkasy, depriving the political leadership exclusive control of benefits from illicit activities taking place under its watch. Moreover, the merger of political power and economic resources is imperfect, preventing the political leadership from reinforcing its rule through patronage and clientelism. Highly fragmented economic resources open the door for the rise of opposition. The political competition that results from these circumstances sustains media pluralism and provides an opportunity for CSOs.

### c. Which types of activities should be supported?

- Supporting projects envisaging the engagement of local authority representatives and CSOs on the basis of equal partnership. Financing projects envisaging the development of the professional capacities of local non-governmental organisations. In particular training should be focused on fundraising strategies, the preparation and communication of analytical material, advocacy campaigns on the regional and local level
- Financing the work of local organisations with low institutional development by regional organisations with high institutional and professional capacities and encouraging the creation of partnerships between such organisations.





## ODESA REGION

### a. About anti-corruption activities

The anti-corruption agenda is not the first priority for inhabitants of the region. Despite a large number of local organizations focused on anti-corruption activities (12 CSOs), there are just a few professional organizations that are truly effective.

Inspired by the Revolution of Dignity, many grassroots initiatives have arisen. These grassroots organizations have been primarily focused on fighting against corruption in utilities, reducing excessive control over entrepreneurial activities through simplifying regulatory procedures, public procurement, and the disbursement of budget funds.

Some watchdog organizations were created by journalists, as well as the region's CSO. Unfortunately, their impact has been meagre in part because of the lack of popular support and political will. As a result after three years, no grassroots organizations have become institutionalized and the general impact rating of local anti-corruption CSOs in the region is deemed to be low.

### c. Local context

According to our interlocutors, Odesa is a clear example of a centralized system of corruption. These are regions with little or any political

willingness to fight against corruption.

There are no local independent TV channels nor an independent local press. The local context of Odesa is determined by the sectoral composition of the regional economy.

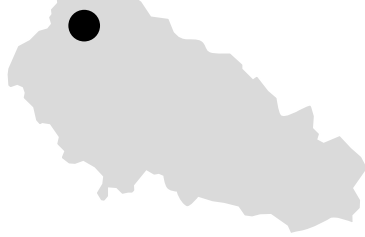
In regions with closed public authorities, activists highlight the importance of informal connections with individual decision-makers who provide relevant information and are willing to provide help. In regions where political willingness is low, engagement with international actors can help to persuade local authorities to adopt a more cooperative stance.

For instance, an interlocutor from an anti-corruption organization in Odesa noted that local authorities participated in round table meetings and anti-corruption initiatives only when European Union representatives were involved.

### c. Which types of activities should be supported?

- Supporting projects which help to increase citizen's awareness and engagement in civic activities
- Supporting projects which help to engage local authority representatives with NGOs on the basis of equal partnership.
- Financing projects envisaging the development of professional capacities of local non-governmental organizations, in particular: training on fundraising, preparation of analytical materials and their further communication, advocacy campaigning on the regional and local level, personal security, etc.
- Supporting the institutional development of a local anti-corruption coalition.
- Providing institutional support to anti-corruption organizations which have had success stories.
- Financing projects focusing on developing independent media in the region.

Uzhhorod



## **ZAKARPATTIA REGION**

### **a. About anti-corruption activities**

The anti-corruption activities of CSOs in Zakarpattia are quite few. Our research demonstrates that there are only four organizations working in this region. All CSOs are grassroots organizations which lack donor support. These organizations are primarily focused on monitoring, reporting and awareness-raising. Meanwhile, most CSO representatives have a non-confrontational attitude toward the authorities, while a few have faced threats.

The challenges for CSOs in Zakarpattia are similar to other regions. The majority of respondents referred to instability and the lack of financing as their main challenges.

### **b. Local context**

All CSO representatives of the main cities of Zakarpattia agreed that political will among authorities to fight corruption is absent. Zakarpattia region faces a specific corruption landscape due to its geographical location, including corruption in the forestry sector and smuggling. Activists focusing on the prevention of illegal logging are in open confrontation with law-enforcement officials. These activists consider their personal security as the main challenge in their activities.

### **c. Which types of activities should be supported?**

- Supporting projects which help to increase citizen's awareness and engagement in civic activities
- Supporting projects which help to engage local authority representatives with NGOs on the basis of equal partnership.
- Financing projects which help to develop professional capacities of local CSOs. These professional capacities might be developed through training concerning the preparation and communication of analytical material, advocacy campaigns on the regional and local level and personal security.
- Providing institutional support to anti-corruption organizations which have had success stories.



## **ZAPORIZHZHYA REGION**

### **a. About anti-corruption activities**

A total number of 9 CSOs are working in the anti-corruption field. The focus of the anti-corruption organizations in Zaporizhzhia are monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building and co-governance. In particular, these organizations deal with anti-corruption training sessions, fighting corruption in education and health sectors, providing anti-corruption expertise concerning decisions of local authorities and monitoring public procurement. Some of these organizations have a confrontational attitude toward the authorities.

### **b. Local context**

Political willingness and the success of anti-corruption activism is among the lowest in Zaporizhzhia. The local context is similar to Mariupol. Zaporizhzhia is a monofunctional city where the principal industry belongs to a sole owner, which is an example of a monopolized system of corruption, according to our interlocutors.

Authorities signaled a willingness to fight against corruption when they signed a memorandum of cooperation with anti-corruption commissions which included a range of civil society organizations.

However, according to our interlocutors, these anti-corruption commissions were subsequently disbanded because they were seen as a threat to

the interests of local political elites. The monopolization of the media market in Zaporizhzhia as well as Mariupol has created significant difficulties for informing the community about relevant issues. Consequently it is necessary to assist the development of an independent media community.

Attempts to increase community awareness and counteract corruption in the field of ecology are currently key issues for Zaporizhzhia and other monofunctional cities such as Mariupol and Khivoy Rih. The donor community can help to solve these problems by supporting the aforementioned areas of local CSOs' activities.

### **c. Which types of activities should be supported?**

- Financing projects focusing on developing independent media in the region.
- Providing institutional support to local CSOs which focus on counteracting corruption in the environment field.
- Supporting projects aimed at developing small entrepreneurial projects in Zaporizhzhia and Mariupol.
- Supporting the institutional development of local anti-corruption coalitions.
- Supporting projects which help to increase citizen's awareness and engagement in civic activities



## LVIV REGION

### a. About anti-corruption activities

Around 13 organizations are focused on anti-corruption activities in the region. The CSOs are operating in the following cities: Lviv - 9, Drohobych - 4. Almost all anti-corruption CSOs (7 of 9 organizations in Lviv, 3 of 4 in Drohobych) have strong professional capacities and a high level of organizational development. Five organizations in Lviv and three in Drohobych receive donor support.

The CSOs are engaged in a wide range of activities including: monitoring and reporting, awareness-raising, advocacy, direct action, capacity-building, and co-governance. Most organizations are involved in more than one type of activity. For example one organization from Drohobych has been responsible for introducing e-government mechanisms aimed at reducing the opportunities for corruption.

Lviv-based anti-corruption organizations possess the professional capacity to effectively carry out anti-corruption activities such as advocacy, awareness-raising, and conducting investigations. High-capacity anti-corruption organizations have the potential to share their knowledge in order to strengthen lower-capacity organizations.

Meanwhile, the capacity of anti-corruption organizations outside Lviv, Drohobych and neighboring areas (Ivano-Frankivsk, Uzhhorod, Lutsk) is restricted by a lack of financial resources. As a result, they cannot hire professionals with

enough skills and knowledge in anti-corruption matters.

### b. Local context

The political will to counteract corruption in Lviv and Drohobych is at a medium level. Certain local politicians are engaged in some anti-corruption fighting which enables certain forms of cooperation between anti-corruption organizations and authorities in Lviv.

The most substantial form of cooperation are examples of co-governance, in which the anti-corruption organization fulfills a specific task alongside state authorities. In Drohobych and Lviv, anti-corruption organizations have worked with the city authorities to introduce e-government instruments that were intended to reduce opportunities to commit corrupt acts. In the same direction, interlocutors stressed positive developments in the local judiciary, as well as collaboration with the National Anti-corruption Bureau.

Drohobych is a positive example of how strong leadership can enable the enforcement of anti-corruption instruments despite the resistance of some local politicians including the deputy. In this case, the local mayor has pushed for implementing some e-governance instruments through some "smart city" tools which have improved public control and civic participation in decision-making.

Local interlocutors report that the mayor's incentive for doing so was fostering economic competition and foreign investment as well as securing support in the next elections. However, the issue of land distribution in the city remains vulnerable to corruption.

Therefore, we can conclude that strong political leadership in Drohobych is able to control corruption and enforce the political will to fight it. Drohobych is the leader of the 2018 Transparency Ranking of 100 Ukrainian Cities.

### c. Which types of activities should be supported?

- To ensure that projects engender cooperation between local organizations outside Lviv and Drohobych, and Lviv-based organizations, as well as neighboring areas (Ivano-Frankivsk,

Uzhhorod, Lutsk) the following components are recommended:

- a. Direct financing to implement projects proposed by local organisations
- b. Mentoring from partner organizations to support anti-corruption activities
- Supporting the institutional development of an anti-corruption coalition in the region.
- Supporting projects envisaging engagement of the representatives of local authorities and CSOs on the basis of equal partnership.
- Financing projects of local organisations with low institutional development by regional organisations with developed institutional and professional capacities. Encourage the building of partnerships between such organisations.



## **TERNOPIL REGION**

### **a. About anti-corruption activities**

There are 8 organizations in the Ternopil region specialized in anti-corruption matters, all of which are in one formal coalition which receives donor support. As a result the coalition is very effective. The assessment of CSOs' success in Ternopil showed positive results. However, anti-corruption activists report pressure from some local officials stemming from old circles of underground corruption.

CSOs have diversified functions to benefit from each other's capacity and create public pressure through collective action. CSOs with non-confrontational tactics such as advocacy, research, and education, rely on CSOs with confrontational tactics in order to create necessary public pressure and force authorities with low political will to take action.

The main spheres of activities of these anti-corruption organizations are: monitoring the lifestyle and declarations of local officers, identifying conflicts of interests, preventing corruption in local decision-making, counteracting corruption in road construction, disposing of budgetary funds and communal property and focusing on the issue of poaching and other forms of illegal use of water bodies.

One of the CSOs focuses on the protection of entrepreneurs from local authorities. At the same time, we found that the main aim of the CSO is only to protect its own members, meaning it does

not impact positively on the level of corruption or change the local rules of the game.

### **b. Local context**

With few exceptions, we assess the political will to fight corruption in the region negatively. In Ternopil, anti-corruption organizations have reported disappointment since a new wave of politicians with civil society backgrounds were co-opted and have not fulfilled the expectations of local CSOs.

The extent of political willingness on part of the city and at the level of regional administration to counteract corruption is low. Ternopil is one example more of how a centralized system of corruption possesses the coercive capacity of the authorities. CSOs have reported active counteraction to anti-corruption activism in diverse forms: from black PR to selective prosecution and personal threats.

### **c. Which types of activities should be supported?**

- Providing institutional support for local CSOs which focus on counteracting corruption in the area of construction and natural resources (land, forest, ecology)
- Financing projects envisaging the development of professional capacities of local non-governmental organizations, in particular: training on fundraising, preparation of analytical materials and their further communication, advocacy campaigning on the regional and local level, personal security, etc.
- Supporting the institutional development of the local anti-corruption coalition.
- Supporting project activities envisaging engagement of the representatives of local authorities and NGOs on the basis of equal partnership.





## VINNYTSYA REGION

### a. About anti-corruption activities

Based on the criteria: (a) The number and level of institutional development and sustainability of anti-corruption CSOs; (b) The number of successful anti-corruption initiatives that have had a positive effect on anti-corruption policies in the region/city/town; (c) The number of anti-corruption CSOs at the region level as well as small towns, Vinnytsia region is the leader in the impact of Local CSOs on implementing anti-corruption reforms. 10 organizations with strong professional capacities are focusing on anti-corruption activities in a relatively small region (Vinnytsia - 8, Khmilnyk - 1, Ladyzhyn - 1). 6 out of 10 organizations receive donor support.

They carry out a watchdog function and at the same time are proactive in designing and implementing anti-corruption policies. Likewise, they have significantly increased the transparency of governance by local authorities. Organizations have increased citizens' awareness and engagement in civic activities by providing training sessions in skills such as monitoring, educating local officials on integrity norms, access to public information, etc.

There are very powerful organizations not only in the center of the region but also in Khmilnyk. This organisation specializes in the following areas: conflict of interest, anti-corruption expertise, procurement and public control in the sphere of public works.

Despite the significant success of these organizations, many of them see the lack of funding and human resources as the main challenge to their activities.

Likewise, we also found high competition for resources among CSOs in Vinnytsya, which influences negatively on anti-corruption achievements.

### b. Local context

The extent of political willingness to counteract corruption among local authorities is at a medium level. One of our interlocutors emphasized that all government decisions are taken at the top of the vertical of power. As long as issues for discussion do not directly concern the redistribution of resources, cooperation is possible.

Some organizations are using confrontation in communication with local authorities, while others use non-confrontations methods.

### c. Which types of activities should be supported?

- Organising seminars and webinars on grant applications to prepare regional and local CSOs.
- Financing projects of local organisations with low institutional development by regional organisations with developed institutional and professional capacities. Encourage the building of partnerships between such organisations.
- Ensuring that projects envisage cooperation between local and national non-governmental organizations comprising the following components: (a) direct financing for implementing local organizations' projects; (b) mentor support from partner organizations at the national level concerning the administration of such projects.
- Supporting the institutional development of the local anti-corruption coalition.



Poltava

### c. Which types of activities should be supported?

- Supporting the institutional development of local anti-corruption coalitions.
- Supporting projects envisaging engagement of the representatives of local authorities and CSOs on the basis of equal partnership.
- Financing projects envisaging the development of professional capacities of local non-governmental organizations, in particular: training on fundraising, preparation of analytical materials and their further communication, advocacy campaigning on the regional and local level, personal security, etc.

## POLTAVA REGION

### a. About anti-corruption activities

While the total number of CSOs working in the anti-corruption field is 10 (7 in Poltava, 3 in Kremenchuk), there are nonetheless only a few CSOs possessing strong professional capacities: one based in Kremenchuk and one in Poltava.

A review of empirical studies suggests that the activities of anti-corruption civil society organizations in this region include monitoring, reporting, and awareness-raising. Anti-corruption activity in the region covers the following areas: conflicts of interest; anti-corruption expertise; public procurement and anti-corruption education. In Kremenchuk organizations with strong professional capacities focus also on political corruption. The main challenge of CSOs is funding and the lack of competent staff, particularly analysts, experts and communication managers. Another challenge is that activists face threats: some have been physically attacked but most commonly receive verbal threats.

### b. Local context

In Poltava, all CSO representatives agreed that the political will among authorities to fight corruption is absent. Equally negative assessments of political will with few exceptions were given in Kremenchuk. The most common types of corruption are in public procurement, land, budget spending and public transportation.



- Financing projects of local organisations with low institutional development by regional organisations with developed institutional and professional capacities. Encourage the building of partnerships between such organisations.
- Organizing seminars and webinars on grant applications preparation for regional and local CSOs

## **LUHANSK REGION**

### **a. About anti-corruption activities**

Anti-corruption is not a top priority for communities in the Luhansk region. While the total number of CSOs working in the anti-corruption field is 13, there are no CSOs with strong professional capacities. CSOs carry out only watchdog functions.

### **b. Local context**

There is a lack of political will to combat corruption in the region, which is characterized by a high degree of informality and patron-client relationships together with a centralized system of corruption.

### **c. Which types of activities should be supported?**

- Supporting projects envisaging increasing citizens' awareness and engagement in civic activities
- Financing projects envisaging the development of professional capacities of local non-governmental organizations, in particular: training on fundraising, preparation of analytical materials and their further communication, advocacy campaigning on the regional and local level, personal security, etc.



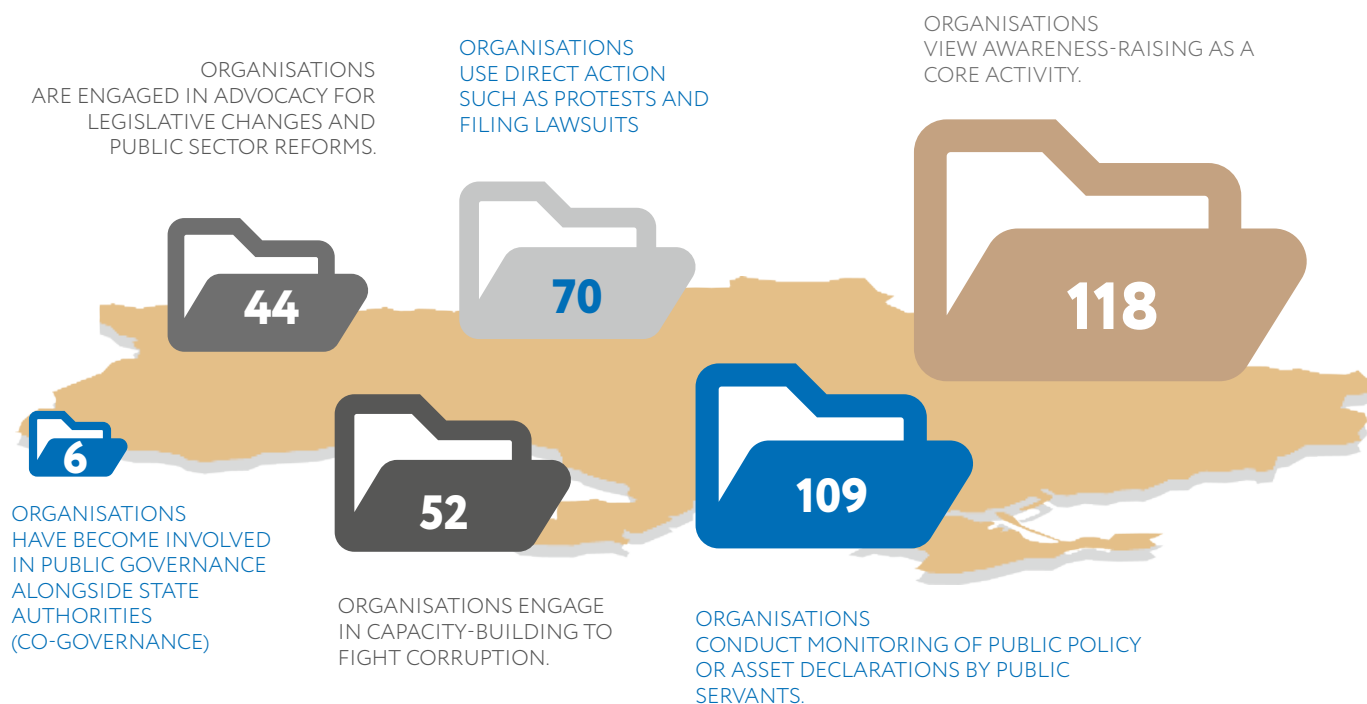
## **KYIV**

Almost all Kyiv-based anti-corruption CSOs focus on national anti-corruption issues (16 of 17 cSOs). So, the report does not include CSOs anti-corruption activity in Kyiv.

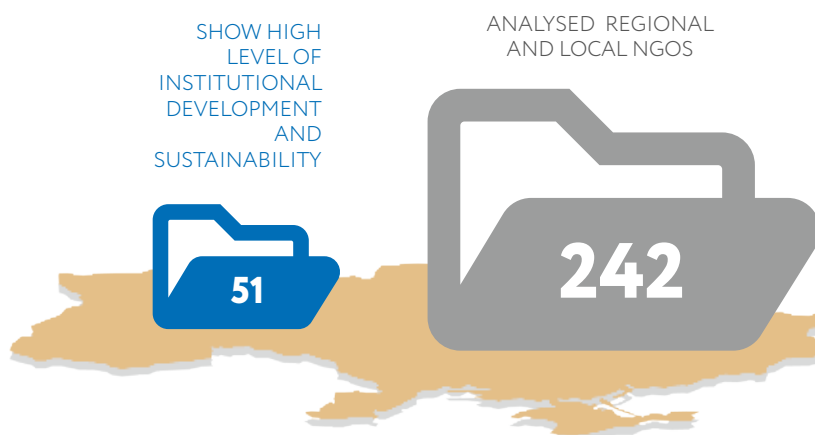
## **CONCLUSIONS AND RECOMMENDATIONS**

## CONCLUSIONS

1. A review of empirical studies suggests that the activities of anti-corruption civil society organisations in regional and local level fall under six categories: monitoring and reporting, awareness-raising, advocacy, direct action, capacity building, and co-governance. The graph below shows which of these types of activities are most common among anti-corruption organisations in the regions of Ukraine. Most organizations are involved in more than one type of activity.



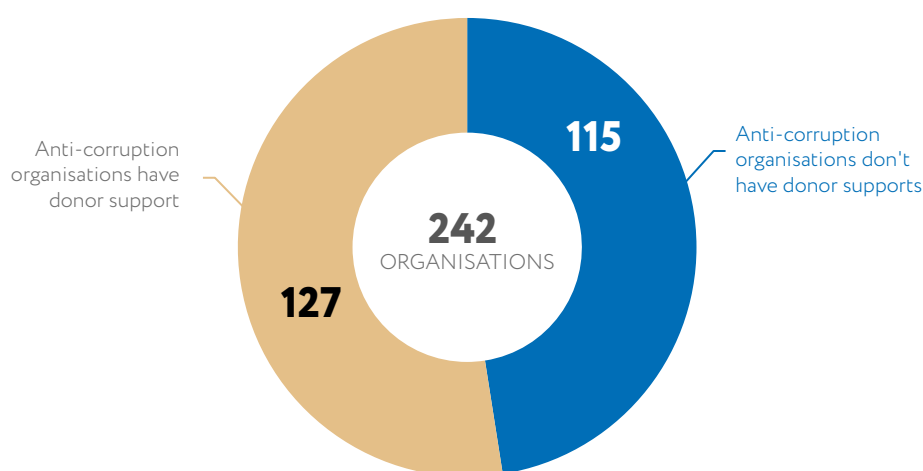
2. Research of regional and local anti-corruption organisations revealed low organisational capacities and financial sustainability of the majority of such CSOs.





## Our respondents gave the following principal reasons for such situation:

- (1) lack of fundraising skills;
- (2) lack of readiness of average individuals to make money contributions for the operation of anti-corruption CSOs;
- (3) impossibility to accept contributions from the big business representatives because of the risks to be accused of advocating their interests;
- (4) lack of competences for preparing grant applications;
- (5) low organisational development of local organisations caused by the lack of readiness of the donor programmes to administer the organisations' project activities as well as the lack of possibilities to support the institutional development.

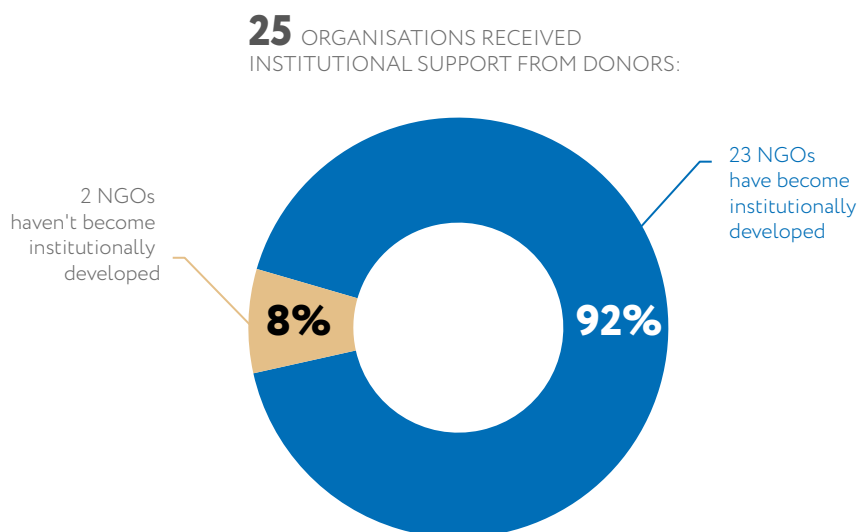


Nevertheless, this does not mean that the organisations who have low level of institutional development and professional capacities are not effective in their activities. Numerous organisations have their success stories of corruption prevention and actively contribute to the implementation of anti-corruption reforms at the regional and local levels, despite their low organisational development and absence of any financial donor support (115 out of 242 anti-corruption organisations operate using the members' contributions or donations of the local community representatives, mainly entrepreneurs). However, the sustainability of the operation of such organisations is undermined by their low institutional development. What is more, due to this factor such organisations cannot operate in a systematic manner, turning into professional non-governmental organisations capable of engaging professionals and consistently working to eliminate the causes for the corruption practices instead of fighting their consequences, being stakeholders respected enough to provide the local authorities with recommendations the latter will follow.

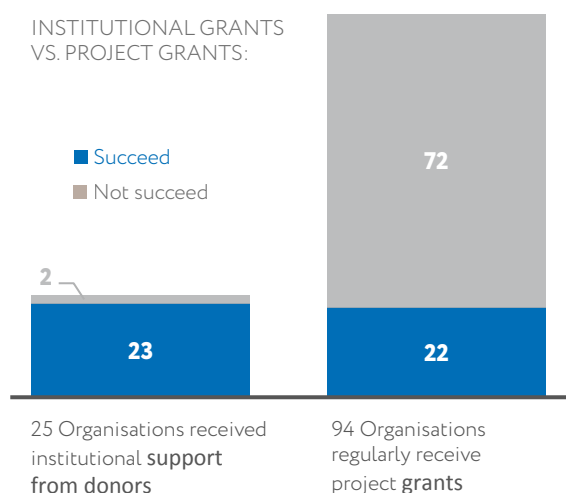
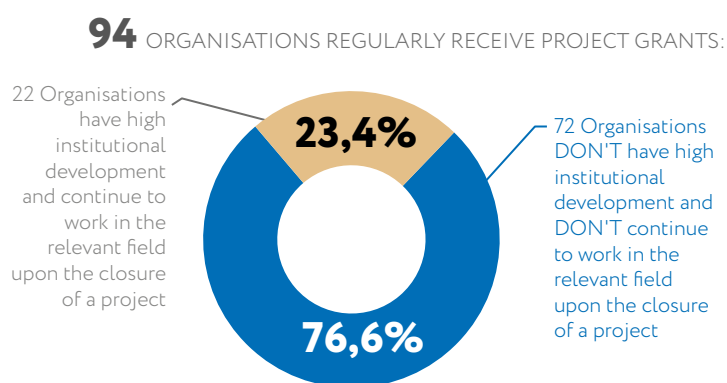
**3.** It is worth noting that the organisations that have high organisational development level do not consider insufficient financing as a principal challenge.

**4.** The majority of donors support project activities of regional and local anti-corruption organisations. However, as the results of our research show, it is exactly the institutional support that proved to be effective.

Thus, the institutional support effectively enables the organisations to grow professionally and helps to establish systematic operation.



The situation when the donors' support is directed to a greater extent to the implementation of short-term projects of the regional level, despite the success of such projects, very often results in the following. A group of anti-corruption activists is established in the regions; they switch from one organisation to another depending on which one of them has the funds to implement a particular project. In the meantime, neither quantity nor quality of the re-gional/local anti-corruption CSOs and activists is strengthened; there is also no increase in the anti-corruption activities' of the organisations and in their impact on the advancement of anti-corruption reforms at the local level.



**5.** In the course of this research, we have revealed a number of factors resulting in the specificities of corruption in a given region / city.

**6.** The underlying causes of corruption quite often lie in the lacunae or collisions in the legislation and the relevant problems can only be solved by amending the laws of Ukraine.

**7.** Establishing formal or informal coalitions at the local level always has positive effect for the impact on the corruption prevention and implementation of anti-corruption reforms.

**8.** Our research has also confirmed the information on the increase of the number of attacks against anti-corruption activists, destruction of their property and other manifestations of persecution of active representatives of the anti-corruption organisations.

## **RECOMMENDATIONS**

1. To include into the programmes aimed at supporting civil society in promoting anti-corruption reforms a component of institutional support of anti-corruption organisations of local and regional level of low organisational development level but who nevertheless have their success stories and development potential.
2. To conduct field research before setting priorities for the programmes of anti-corruption focus; this would help to understand the local context and the demand for particular anti-corruption measures for the region / city.
3. To have in mind the local context of each particular city or region when setting the support priorities. It is important to take into account the specificities of corruption in each particular region/city and to be guided, first of all, by the demand of local CSOs and initiatives. They have better understanding of the activities that need support for the successful implementation and sustainability of anti-corruption reforms in their respective region / city.
4. To organise seminars and webinars on grant applications preparation for regional and local CSOs.
5. To finance project activities of local organisations with low institutional development through regional organisations with high institutional and professional capacities. To encourage building of partnerships between such organisations.

**6. To ensure that the projects envisaging cooperation between local and national non-governmental organisations comprise the following components:**

(a) direct financing of the implementation of project activities to be provided to the local organisations;

(b) mentor support from the partner organisation of the national level concerning the administration of such projects.

7. To support institutional development of local anti-corruption coalitions.

8. To support project activities envisaging engagement of the representatives of local authorities and CSOs on the basis of equal partnership.

9. To finance the projects envisaging development of professional capacities of local non-governmental organisations, in particular, training on fundraising, preparation of analytics and their further communication, advocacy campaigning on regional and local level, personal security etc.

## **ATTACHMENT 1.**

### **IMPACT RATING SCALE OF LOCAL ANTI-CORRUPTION CSOs**

Levels of impact of Anti-corruption CSOs in a Region/city (town) were identified based on the criteria:

1. The number of high level of institutional development and sustainability of anti-corruption CSOs;
2. The number of successful anti-corruption initiatives that have had a positive effect on anti-corruption policies in the region/city (town);
3. The number of anti-corruption CSOs in region level as well as small towns of a region.

| REGION          | NUMBER OF ANTI-CORRUPTION CSOS IN A REGION | LEVELS OF IMPACT OF ANTI-CORRUPTION CSOS IN A REGION (HIGH/MEDIUM/LOW) | CITY/TOWN       | NUMBER OF LOCAL ANTI-CORRUPTION CSOS | LEVELS OF IMPACT OF LOCAL ANTI-CORRUPTION CSOS (HIGH/MEDIUM/LOW) |
|-----------------|--|--|-----------------|--------------------------------------|--|
| Dnipropetrovska | 26   | medium   | Nikopol         | 4                                    | medium   |
|                 |  |  | Kryvyi Rih      | 5                                    | medium   |
|                 |  |  | Marhanets       | 1                                    | low  |
|                 |  |  | Dnipro          | 16                                   | medium   |
| Chernihivska    | 6  | low  | Nizhyn          | 1                                    | low  |
|                 |  |  | Chernihiv       | 5                                    | low  |
| Kharkivska      | 13   | medium   | Kharkiv         | 11                                   | medium   |
|                 |  |  | Izium           | 1                                    | low  |
|                 |  |  | Chuhuiv         | 1                                    | low  |
| Zhytomyrska     | 7  | medium   | Olevsk          | 1                                    | low  |
|                 |  |  | Zhytomyr        | 6                                    | medium   |
| Poltavska       | 10   | low  | Kremenchuk      | 3                                    | medium   |
|                 |  |  | Poltava         | 7                                    | low  |
| Khersonska      | 16   | medium   | Kherson         | 15                                   | high   |
|                 |  |  | Kozachi Lakheri | 1                                    | low  |
| Kyivska *       | 8  | low  | Baryshivka      | 2                                    | low  |
|                 |  |  | Bila Tserkva    | 2                                    | low  |
|                 |  |  | Brovary         | 1                                    | low  |
|                 |  |  | Vasylkiv        | 1                                    | low  |
|                 |  |  | Piskivka        | 1                                    | low  |
|                 |  |  | Ukrainka        | 1                                    | low  |
| Zaporizka       | 9  | low  | Zaporizhzhia    | 9                                    | low  |



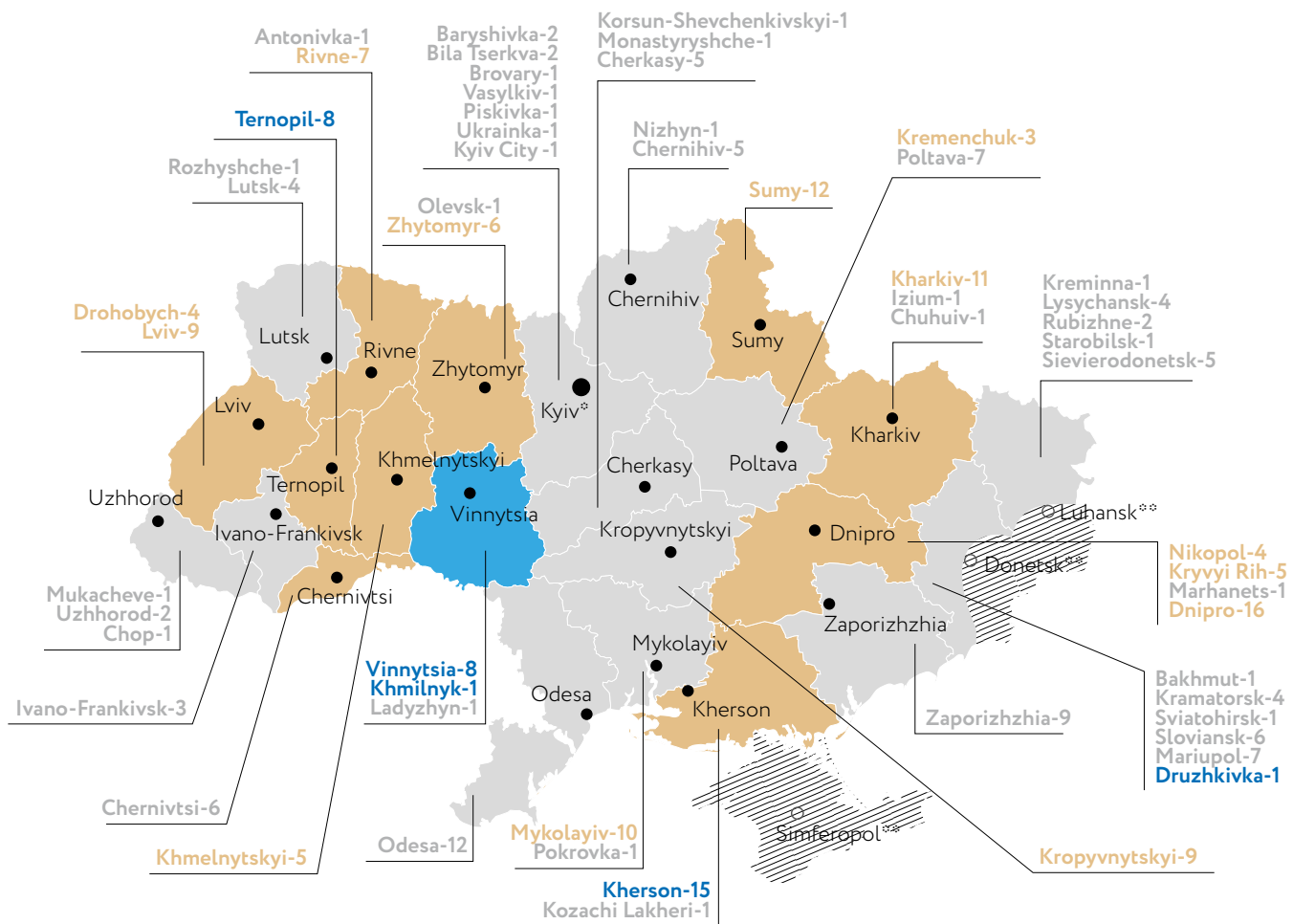
| REGION                            | NUMBER OF ANTI-CORRUPTION CSOS IN A REGION | LEVELS OF IMPACT OF ANTI-CORRUPTION CSOS IN A REGION (HIGH/MEDIUM/LOW) | CITY/TOWN        | NUMBER OF LOCAL ANTI-CORRUPTION CSOS | LEVELS OF IMPACT OF LOCAL ANTI-CORRUPTION CSOS (HIGH/MEDIUM/LOW) |
|-----------------------------------|--|--|------------------|--------------------------------------|--|
| Luhanska                          | 13   | low  | Kreminna         | 1                                    | low  |
|                                   |  |  | Lysychansk       | 4                                    | low  |
|                                   |  |  | Rubizhne         | 2                                    | low  |
|                                   |  |  | Starobilsk       | 1                                    | low  |
|                                   |  |  | Sieviero-donetsk | 5                                    | low  |
| Donetska                          | 20   | low  | Bakhmut          | 1                                    | low  |
|                                   |  |  | Kramatorsk       | 4                                    | low  |
|                                   |  |  | Sviatohirsk      | 1                                    | low  |
|                                   |  |  | Sloviansk        | 6                                    | low  |
|                                   |  |  | Mariupol         | 7                                    | low  |
|                                   |  |  | Druzhkivka       | 1                                    | high   |
| Odeska                            | 12   | low  | Odesa            | 12                                   | low  |
| Vinnytska                         | 10   | high   | Vinnytsia        | 8                                    | high   |
|                                   |  |  | Khmilnyk         | 1                                    | high   |
|                                   |  |  | Ladyzhyn         | 1                                    | low  |
| Mykolaivska                       | 11   | low  | Mykolaiv         | 10                                   | medium   |
|                                   |  |  | Pokrovka         | 1                                    | low  |
| Kirovohradska<br>(Kropyvnytskoho) | 9  | medium   | Kropyvnytskyi    | 9                                    | medium   |
| Sumska                            | 12   | medium   | Sumy             | 12                                   | medium   |

| REGION                                     | NUMBER OF ANTI-CORRUPTION CSOS IN A REGION | LEVELS OF IMPACT OF ANTI-CORRUPTION CSOS IN A REGION (HIGH/MEDIUM/LOW) | CITY/TOWN              | NUMBER OF LOCAL ANTI-CORRUPTION CSOS | LEVELS OF IMPACT OF LOCAL ANTI-CORRUPTION CSOS (HIGH/MEDIUM/LOW) |
|--|--|--|------------------------|--------------------------------------|--|
| Lvivska                                    | 13   | medium   | Drohobych              | 4                                    | medium   |
|  |  |  | Lviv                   | 9                                    | medium   |
| Cherkaska                                  | 7  | low  | Korsun-Shevchenkivskiy | 1                                    | low  |
|  |  |  | Monasteryshche         | 1                                    | low  |
|  |  |  | Cherkasy               | 5                                    | low  |
| Khmelnyska                                 | 5  | medium   | Khmelnyskiy            | 5                                    | medium   |
| Volynska                                   | 5  | low  | Rozhyshche             | 1                                    | low  |
|  |  |  | Lutsk                  | 4                                    | low  |
| Rivnenska                                  | 8  | medium   | Antonivka              | 1                                    | low  |
|  |  |  | Rivne                  | 7                                    | medium   |
| Ivano-Frankivska                           | 3  | low  | Ivano-Frankivsk        | 3                                    | low  |
| Ternopil'ska                               | 8  | medium   | Ternopil               | 8                                    | high   |
|  |  |  | Mukacheve              | 1                                    | low  |
| Zakarpatska                                | 4  | low  | Uzhhorod               | 2                                    | low  |
|  |  |  | Chop                   | 1                                    | low  |
| Chernivetska                               | 6  | low  | Chernivtsi             | 6                                    | low  |
| Sevastopol and Avtonomna Respublika Krym** |  |  |                        |                                      |  |
| Kyiv City*                                 | 1  |  | Kyiv                   | 1                                    | low  |

\* Almost all Kyiv-based anti-corruption CSOs focus on national anti-corruption issues (16 of 17 CSOs).

\*\* Survey was conducted only in the territories controlled by Ukraine.

## ATTACHMENT 2. ANTI-CORRUPTION CSOs MAP

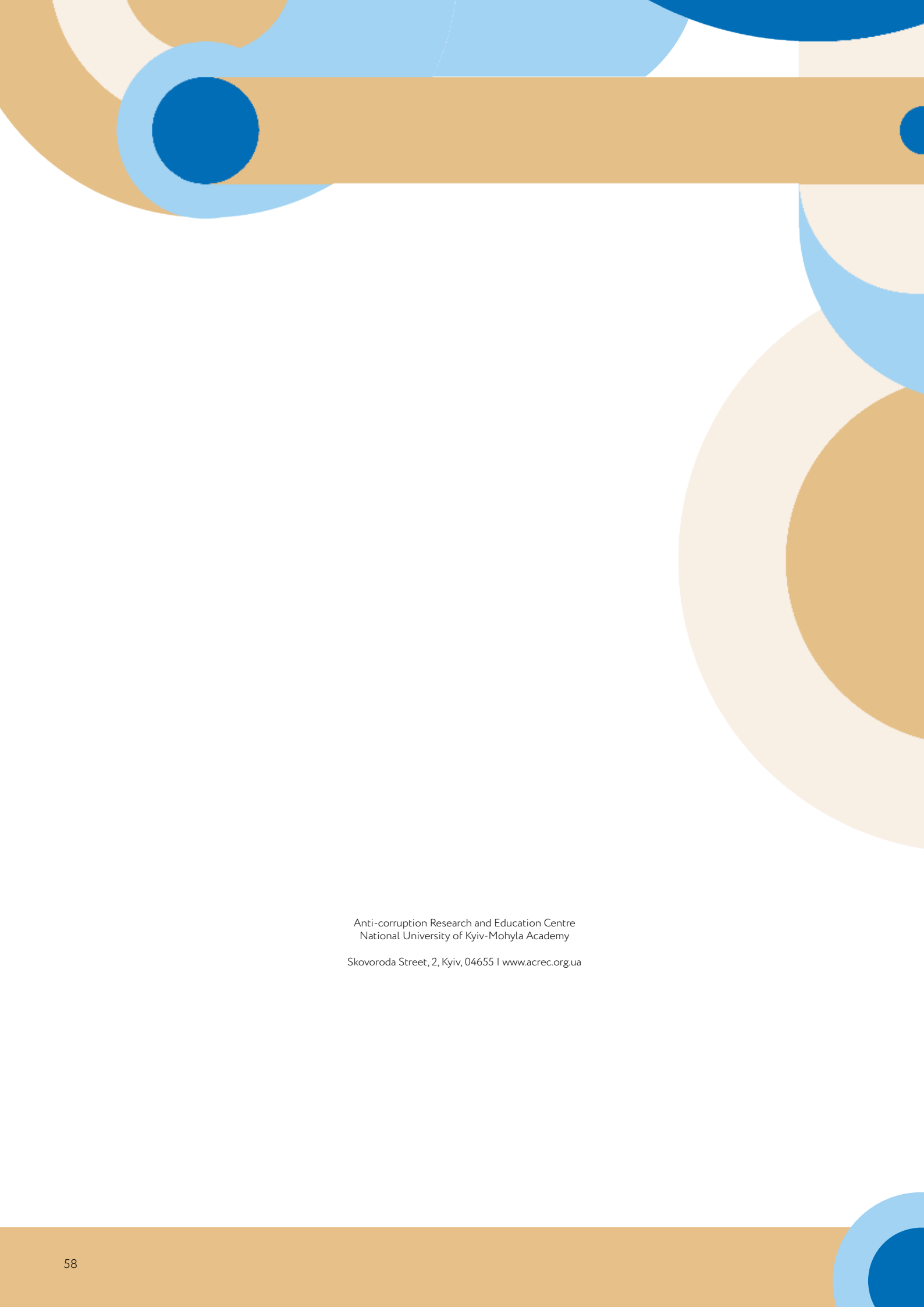


Levels of impact of Anti-corruption CSOs in a Region: ■ High ■ Medium ■ Low

Number and Levels of impact of Local Anti-corruption CSOs: **Druzhkivka-1** **Nikopol-4** **Marhanets-1**

\* Almost all Kyiv-based anti-corruption CSOs focus on national anti-corruption issues (16 of 17 CSOs).

\*\* Survey was conducted only in the territories controlled by Ukraine.



Anti-corruption Research and Education Centre  
National University of Kyiv-Mohyla Academy

Skovoroda Street, 2, Kyiv, 04655 | [www.acrec.org.ua](http://www.acrec.org.ua)