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Research Paper

The cooperation of the government and CSOs in reforms

Cases of Public Administration Reform (PAR) and open data

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Executive Summary

Ukraine has shown remarkable resilience during the full-scale invasion by russia. The country is currently facing the challenge of ensuring its own defence and security capabilities. However, at the same time, it must also finance the emergency reconstruction of war-damaged infrastructure and prepare for substantial post-war recovery efforts, as well as introduce the vast array of changes required for EU integration. To achieve this, there must be capable authorities in place at both national and local levels, and in turn this requires the completion of public administration reform (PAR). Effective policies can only be developed on the basis of data analysis and assessment, and this depends on more open data, which is also needed for the monitoring of the effectiveness and efficiency of recovery spending.

In Ukraine, civil society organisations (CSOs) play a crucial role in advancing governance reforms, particularly in PAR and open data initiatives. They work both as partners of the government in drafting effective decisions and as watchdogs that enhance government transparency, accountability and citizen participation. CSOs serve as key actors in ensuring that reconstruction is transparent, inclusive and aligned with democratic principles. Their ability to monitor public spending, advocate for open governance and provide independent expertise helps prevent corruption and ensure that aid and recovery funds are used efficiently and equitably.

This report examines key features of CSO–government cooperation in the areas of PAR and open data, identifies key challenges and offers policy recommendations to strengthen the role of civil society in both reform and reconstruction. CSOs contribute to policy development, provide independent expertise and monitor government performance. In the area of PAR, CSOs play an essential role in advocating for and implementing reforms, supported by donor-funded initiatives such as EU4PAR. However, despite substantial CSO engagement, reform efforts often face fragmentation due to a lack of coordination among donors and government agencies. Additionally, the Ukrainian civil service suffers from high turnover and insufficient financing, hampering reform sustainability.

Open data has been a critical tool for transparency and accountability, with CSOs instrumental in developing Ukraine's open data ecosystem, enabling public oversight of government spending and reconstruction efforts. Key platforms such as e-Data, Prozorro and DREAM have enhanced transparency in financing, procurement and recovery projects. However, during full-scale invasions, there is a rollback in data accessibility, with authorities citing security concerns to limit public access to critical information.

Despite these contributions, CSO–government cooperation faces several challenges. CSOs rely heavily on international donors due to the absence of sustainable domestic funding sources. Their participation in policymaking remains informal and inconsistent, though the Law on Public Consultations may improve this in the future. Additionally, the absence of a unified strategy among donors and government actors leads to inefficiencies in reform implementation, while political and bureaucratic resistance continues to hinder transparency reforms.

These challenges are particularly acute in the reconstruction context, where rapid decision-making and large financial flows require robust oversight. CSOs are often the only actors ensuring transparency and community input at the local level.

To fully leverage civil society's potential, there is a need to institutionalise CSO participation, ensure sustainable funding and require transparency – especially through open data – across all levels of government and donor programming. Strengthening institutional frameworks, ensuring sustainable financing, and enhancing government–CSO coordination will be essential in driving forward democratic governance and public administration reforms in Ukraine.

Introduction

Civil society organisations (CSOs) serve as key drivers of democratic governance, policy reforms, public accountability and initiatives and acting as watchdog in emergency recovery. In Ukraine, CSOs have long played an important role in fostering transparency, advocating for government accountability and ensuring public participation in decision-making processes. Their influence has significantly expanded, particularly after russia's full-scale invasion on 24 February 2022, as they have taken on additional responsibilities related to wartime resilience, reconstruction and reform monitoring. They are expected to play an increasingly important role in supporting, implementing and monitoring the reconstruction process at both national and local levels.

CSOs contribute to governance reforms by engaging in policy formulation, monitoring public administration performance and advocating for greater transparency and efficiency. They serve as intermediaries between the government and the public, ensuring that reforms are inclusive and reflective of societal needs. Additionally, CSOs act as watchdogs, exposing corruption, inefficiencies and policy gaps that hinder reform implementation. Therefore, they play a double role: as partners of the national and local governments in the development and implementation of reforms; and as watchdogs. This dual role makes Ukraine's CSOs particularly influential. However, the work of the CSO strongly relies on the donors' support, as other sources of financing are largely absent for CSOs. Therefore, the reforms are successful when there is an efficient golden triangle: cooperation and coordination between Ukraine's authorities, CSOs and international donors.

Ukraine's ability to absorb international aid – both public and private – is traditionally limited and currently falls short of meeting the scale of recovery needs. However, the destruction caused by the war, the urgency of humanitarian support, and Ukraine's strategic goal of EU membership justify a robust and well-coordinated reconstruction effort. In this context, it is crucial to understand how national and regional authorities cooperate with civil society and how their capacities can be strengthened. CSOs are indispensable in ensuring that reconstruction is inclusive, transparent and aligned with European integration principles. Decentralisation efforts would not have achieved their current level of success without the active involvement of regional CSOs, and their participation remains critical for the sustainability of recovery and development initiatives.

Ultimately, it is Ukrainian national and local government entities that make decisions and are responsible for their implementation. Therefore, there is a strong need for effective public administration. PAR in Ukraine is a comprehensive effort aimed at modernising the country's governance system, in order to align with European standards, improve efficiency and support democratic principles. The reform seeks to build a professional and efficient public administration system and to transfer non-essential functions from central ministries to local governments. Recognising this, CSOs have actively engaged in PAR, playing a vital role in ensuring that government institutions become more professional, transparent, accountable and responsive to citizens.

Another key area of engagement is open data, where CSOs advocate for greater access to public information, supporting anti-corruption initiatives and informed policymaking. Open data reform seeks to improve public sector transparency and reduce corruption by enabling citizens and organisations to access and analyse government data. These two reforms are closely interconnected, as effective and efficient policymaking is impossible without reliable data. Without access to data, CSOs cannot contribute to the development of sound decisions or monitor their implementation.

Both PAR and open data are key for rebuilding effective, human-centred institutions and ensuring the transparency, accountability and integrity of Ukraine's recovery. Policies should be based on sound policy decisions. Open data initiatives empower civil society to track public spending, assess reconstruction efforts and hold authorities accountable, while PAR aims to build a capable and professional public service essential for Ukraine's future within the EU.

The research was conducted through two online focus groups – one on PAR and another on open data – featuring seven to nine experts from active CSOs and moderated using structured guides, developed by members of RISE Ukraine – a coalition of CSOs. The methodology enabled a deep dive into accountability, collaboration and innovation across these reforms. AI-based tools supported the thematic analysis of focus group transcripts, helping to identify recurring patterns, challenges and opportunities for policy action.

The objectives of this research are to analyse the roles and contributions of CSOs in the implementation and oversight of PAR and open data reforms; identify barriers that limit the effectiveness of CSO–government cooperation; examine the extent to which civil society is integrated into reconstruction processes, especially at the subnational level; and propose recommendations to enhance the impact, sustainability and coordination of CSO engagement in reform and recovery.

The central research questions are:

1. What roles do CSOs currently play in PAR and open data initiatives in Ukraine?
2. How do CSOs contribute to transparent, accountable and citizen-focused governance?
3. What are the main barriers to CSO engagement in reform and reconstruction efforts, and how can they be addressed?
4. How can collaboration among CSOs, the government and international donors be improved to support efficient and inclusive reconstruction?

This report is structured as follows. It starts with a literature review on the role of CSOs in the implementation of reforms and changes. Cooperation between the government and CSOs in relation to PAR and open data is then discussed. The report ends with conclusions and policy recommendations.

Literature review

CSOs have been instrumental in pushing for greater transparency, accountability and efficiency in public administration. According to a Chatham House survey, CSOs are increasingly engaged in policy discussions and legislative processes, often working alongside government institutions to promote good governance. However, despite improved engagement from state actors, CSOs still perceive government cooperation in relation to delivering reforms as inadequate.

The analysis shows that CSOs contribute to reform implementation in various ways, such as participating in policy drafting, providing independent expertise and ensuring public oversight. Many of them are involved in working groups established by ministries to help shape new legislative frameworks. Moreover, the importance of local-level participation is noted, as CSOs assist in the development of community-based recovery plans.

One of the key challenges highlighted by a survey conducted by Ednannia is the lack of institutionalised mechanisms for CSO participation in government decision-making processes. While CSOs have successfully advocated for reforms, their role often remains informal, with limited legal provisions in place to ensure their continuous engagement. This is likely to change once the Law on Public Consultations becomes effective, though this would only occur 12 months after the period of martial law comes to an end.

Open data is a crucial element of public administration reform (PAR), as effective and efficient policymaking is impossible without reliable data. Moreover, open data fosters transparency and enables civic engagement. Ukrainian CSOs have actively promoted open data policies and digital governance reforms, with many organisations focusing on monitoring government spending and procurement processes, and advocating for data accessibility as a tool for reducing corruption. Open data is one of the key focuses of the RISE Ukraine coalition,[1] which was created to advocate for the integrated, inclusive and accountable recovery of Ukraine. The coalition members launched a number of public appeals and wrote a letter to the Ombudsman on the importance of open data.

Chatham House identified that one of the major risks in Ukraine's reconstruction process is the misuse of recovery funds, thus demonstrating how open data initiatives are essential for accountability. CSOs played a key role in the development of the digital platform DREAM (Digital Restoration Ecosystem for Accountable Management), which enhances transparency in reconstruction projects and had been one of the prior focuses and advocacy campaigns of the RISE Ukraine coalition. In spring 2023, DREAM was put forward as the official IT platform for transparent reconstruction and recovery by the Ministry for Development of Communities and Territories of Ukraine and Agency of Restoration; and in the autumn of that year, the Cabinet Ministers of Ukraine (CMU) granted DREAM the status of experimental IT platform for reconstruction and recovery. As of the beginning of 2025, however, the use of the platform is still not compulsory for all implementors of reconstruction projects, as the Law on DREAM and other respective decisions have not yet been approved. Despite this, it is designated not only as a platform for transparent reconstruction and recovery but also as a system for public investment management.

Despite these efforts, the survey conducted by Ednannia highlights several barriers to effective data openness, including resistance from government agencies, lack of interoperability between government databases, and inconsistent enforcement of open data laws. Additionally,

[1] RISE Ukraine coalition was created in summer 2022. It has more than 50 members as of the beginning of 2025.

some CSOs struggle with limited technical expertise and financial resources and as a result cannot fully engage in data-driven advocacy.

CSOs in Ukraine have taken on a strong watchdog function, particularly in monitoring public sector performance and preventing corruption. Civil society remains committed to ensuring state accountability, especially in the context of wartime reconstruction efforts. The CSOs are also active in monitoring state procurement, budget expenditures and the efficiency of local governments in implementing reforms. In particular, CSOs expose inefficiencies and push for corrective measures. In particular, TI Ukraine launched Dozorro, which aims at the public procurement monitoring. The platform enables citizens, civil society organizations, and businesses to analyse procurement data, report irregularities, and hold contracting authorities accountable, thereby increasing transparency and integrity in public spending. Some CSOs also conduct monitoring of procurement, recovery and reconstruction projects, government spending, etc. Access to quality data is essential for this.

However, challenges persist. First, the work of CSOs is fully dependent on the financing availability of donors, as the government, citizens and business sector are not ready to provide financing for this. There are also risks that donor-driven recovery efforts may sideline Ukrainian civil society actors, limiting their influence over the reform process. Furthermore, political resistance and bureaucratic inertia are significant impediments to effective CSO engagement in governance.

Overall, a number of surveys and studies show that the role of CSOs in implementing PAR and advancing data openness in Ukraine is indispensable. They serve as catalysts for change, bridging the gap between government institutions and citizens while ensuring that reforms are implemented transparently and effectively. However, to enhance their impact, CSOs require stronger legal frameworks that guarantee their participation, improved technical capacities and sustainable financial support.

The cooperation between the government and CSOs: public administration reform

Public administration reform

Public administration reform (PAR) is among the most complex of reforms, as it requires changes on both national and local levels in terms of the functions undertaken by different entities and the need to increase the capacities of civil servants; it also demands additional financing. At the same time, Ukrainians often consider civil servants at both national and local levels as either corrupt or ineffectual and thus they are not in favour of raising the salaries of such workers. In fact, it is often expressed that both the salaries and the number of civil servants should be reduced. However, Ukraine needs a highly professional and capable civil service for admission to the EU, as CSOs cannot always fill the gaps. Ultimately, it is Ukrainian national and local government entities that make decisions and are responsible for their implementation.

Overall, there is substantial involvement by CSOs in: advocacy for PAR; the development of policies in different areas of public administration; supporting the government in the development and implementation of such policies; monitoring reform implementation; and ensuring that governance processes remain citizen-focused and accountable.

The CSOs' activities are financed by various donors within the framework of various international technical assistance (ITA) projects. One of the most active CSOs in the field is Centre of Policy and Legal Reform.

The leading project in the sphere is EU4PAR, which supports the government in implementing the PAR necessary to build a digital, service-oriented state based on European good governance practices. The project focuses on enhancing service delivery, strengthening a professional and politically neutral civil service, and improving the accountability of public institutions. While the project primarily assists the government, it also engages with CSOs in advocating for reforms, aligning policies and enhancing transparency in public administration.

In March 2014, Ukrainian alumni of leading international universities created the Professional Government Association (PGA) of Ukraine. The organisation brings together professionals who share the aim of improving public administration in Ukraine and transforming the government into an effective, innovative and service-oriented institution. PGA focuses on assessing the effectiveness of the civil service, engaging experts in reform processes, facilitating public administration reforms and monitoring their implementation to align Ukraine's civil service with international best practices.

Another platform for discussion of PAR was organised by Aspen, which involved key stakeholders from various groups, including government and CSOs. The findings of these discussions contributed to reform relating to remuneration of civil servants, which is reflected in the draft law No.8222. It is to be approved in Q1 2025, according to the Ukraine plan under the Ukraine Facility.

However, the reform faces challenges and the debated surround it has been fragmented.

CSOs involvement in PAR: results from the focus group

To gain deeper insights into how CSOs contribute to PAR in Ukraine, a focus group discussion was conducted with representatives of leading CSOs who are actively engaged in this area (see Appendix for more details). Participants shared their experiences with advocacy, policy development, monitoring and cooperation with public authorities and donors. The discussion highlighted both the critical role CSOs play in reform implementation and the systemic challenges that hinder their effectiveness.

The focus group revealed that CSOs are deeply involved not only in supporting reform initiatives but also in holding public institutions accountable through independent monitoring and analysis. At the same time, participants pointed to recurring issues such as fragmented donor support, lack of coordination with state institutions, limited formal engagement mechanisms and high staff turnover in government bodies. These obstacles often weaken reform sustainability and limit the impact of civil society efforts.

The quotes below reflect the experiences, observations and recommendations of CSO practitioners working on PAR, illustrating both their achievements and the barriers that must be addressed if Ukraine's public governance is to be strengthened.

The role of civil society organisations in public administration reform

Civil society in Ukraine plays a critical role in assisting and monitoring PAR, especially in the context of wartime governance and the future reconstruction of the country. While CSOs do not directly secure funding for PAR, they receive support from international donors to contribute to its successful design and implementation. One of the key functions of CSOs is to provide data-driven recommendations to the government based on the results of the monitoring. Their contributions are particularly important for ensuring that reconstruction processes are both inclusive and accountable.

Focus group discussions revealed that CSOs are actively involved in supporting reform implementation by offering evidence-based recommendations and monitoring the performance of public institutions. One participant highlighted this proactive role: *"We try to help the government by providing recommendations for improving processes through our monitoring and analysis."* Such monitoring is critical for identifying bottlenecks in administrative performance that could delay reconstruction and undermine public trust in state institutions.

This allows CSOs to actively identify gaps in public administration and advocate for solutions. They expose inefficiencies, corruption risks and obstacles in the reform process. As one expert explained, *"Civil society has an important role to play in monitoring the implementation of the reform and developing relevant recommendations. Even if it is very harsh criticism. But that's what watchdogs are for – there is a public sector for this, which should show the government where the problems are, what to pay attention to.*" This function is especially vital during reconstruction, when large flows of international aid and investment require public oversight to prevent misuse and ensure that funds are directed where they are most needed.

Another important contribution of CSOs is advocating for reforms through coalitions that help ensure their sustainability. One participant noted, *"A major issue is how to support such coalitions of CSOs. It doesn't have to be just one coalition; there can be several."* These coalitions are particularly important for coordinating efforts across different sectors and regions, which is essential for managing complex, multi-level reconstruction processes.

By engaging in policy development, monitoring implementation and facilitating communication between local communities and government bodies, CSOs play a strategic role in shaping a resilient, transparent and service-oriented state. Their involvement is not only a key factor in the success of PAR, but also a cornerstone for building public institutions capable of managing Ukraine's recovery and driving forward its European integration.

Challenges in public administration reform implementation

Despite the active engagement of civil society, several key challenges hinder the effective implementation of PAR – many of which directly threaten the effectiveness of post-war reconstruction and the country's EU integration trajectory.

1. One of the most prominent issues raised during the focus group discussions was the fragmented nature of donor assistance. Many donors focus on specific reform segments rather than a unified strategy, leading to fragmented implementation. As one participant observed, *"European donors support individual segments of reforms but often do not have a coherent strategy."* This lack of coordination makes it difficult to define common goals and align efforts effectively.

Another participant added, *"International organisations believe that when they recruit civil servants, they are helping Ukraine implement projects with professional specialists. At the same time, they save money on project implementation."* However, such donor-driven recruitment often creates contradictions and duplications, further complicating reform efforts.

2. This problem is further compounded by a lack of proper coordination between donors and the government. Moreover, the same is true especially on local level, when various donors propose different approaches. One expert reflected on this tension: *"In Ukraine, there is a situation where donors fail to coordinate their projects with the government, and therefore we do not have a single strategy for public administration reform.*" The resulting confusion not only affects implementation but can also erode public confidence in reform processes during a time when trust and efficiency are essential for managing recovery and rebuilding state capacity.

3. A related issue is the great number of independent reform initiatives. Overlapping projects lead to a dilution of priorities, negatively impacting institutional memory and long-term reform sustainability. One participant warned that *"An excessive number of projects can lead to a blurring of the directions for improving government and institutional memory in the civil service.*" For a country undergoing large-scale reconstruction, this lack of focus threatens to waste valuable resources and delay meaningful change.

4. In addition, CSOs noted significant staffing problems within the public sector workforce, including high turnover rates and low salaries, which affect reform implementation. One expert emphasised the severity of the issue: *"In some cases, the lack of personnel reaches 50%… and people who work in public service are often forced to leave their positions due to low salaries or due to the blockage of their work at the government level."*

Frequent personnel changes and politically motivated dismissals further disrupt institutional stability. As another participant explained, *"Then a new team comes in and tries to understand the case… The issue of staff turnover and frequent political changes is sometimes an even bigger concern for donors and us as civil society."*

These challenges highlight the urgent need for a more strategic approach to reform, improved donor–government coordination and efforts to strengthen human resource capacity in the public sector.

PAR in Ukraine struggles due to uncoordinated donor efforts, a lack of alignment between international organisations and the government, and too many separate projects that weaken priorities. On top of that, high staff turnover, low salaries and political instability make it even harder to sustain long-term progress. Without a more strategic and coherent approach, these structural weaknesses risk undermining both the reform agenda and the reconstruction effort it is meant to support.

The role of civil society in strengthening local communities

At the local level, CSOs contribute to enhancing PAR by engaging in organisation of the process, communication, data collection and advocacy. Their involvement is especially crucial in small communities where administrative capacity is limited, awareness of reforms is low and state institutions lack the resources to fully engage with citizens. In the context of Ukraine's recovery and decentralisation, CSOs help ensure that reforms do not remain abstract policies but are translated into practical, locally adapted actions.

1. Participants in the focus group highlighted that local governments can enhance civil society participation by improving communication and collaboration. One expert pointed out, *"It is necessary to develop an employer brand for the civil service and create communication strategies at the government level to attract specialists to work in the public sector."*

Smaller municipalities often struggle with a lack of awareness and expertise in reform implementation. Another participant noted, *"It is important to raise awareness [of local governments]. The smaller the community, the lower the level of awareness among specialists responsible for implementing legislative initiatives and reforms. It is crucial to focus on this issue."*

By working with CSOs, local governments can develop tailored reform strategies that address community-specific needs. Here, CSOs serve as reform enablers – guiding local administrations, explaining new legislation and helping officials understand and apply national policies.

2. CSOs can act as intermediaries between local administrations and citizens, helping to bridge gaps in governance. One participant described the current challenge: *"Currently, there is no effective coordination with these donors. Ukraine is experiencing a unique donor cycle of humanitarian response for the second time due to the full-scale invasion. We had an emergency, then a response again, and this is a challenge."* This situation presents an opportunity for local administrations to involve civil society in reform discussions and implementation efforts.

3. CSOs play a crucial role in collecting and analysing data on local reforms, ensuring transparency and accountability. As one expert said, *"Civil society has an important role to play in monitoring the implementation of the reform and developing relevant recommendations."* By supporting data-driven decision-making, CSOs help local administrations adjust their strategies to improve reform effectiveness.

4. Finally, CSOs help local governments respond to specific community needs by advocating for policies that align with those needs. *"CSOs can articulate and advocate for the needs of local communities, assisting the government in adapting to new standards,"* one participant explained. By forming coalitions, civil society groups can increase their influence in policy-making, ensuring that local governments prioritise community-driven reforms.

CSOs don't just support local governance – they also transform it. They step in where governments struggle – organising reforms, bridging communication gaps and holding officials accountable through data and advocacy. By connecting local administrations with citizens, they ensure that policies are not imposed from above but shaped by real community

needs. Their impact is not simply helpful – it is essential for building transparent, responsive and people-centred governance, particularly in times of crisis and reconstruction.

Donor support for public administration reform

International donors play a crucial role in financing and supporting PAR in Ukraine through various initiatives. Their engagement has helped sustain reform momentum, especially during wartime, and has enabled the development of modern governance frameworks necessary for Ukraine's recovery and future EU accession.

1. Donors provide financial and technical support for reforming public institutions and improving governance structures.

One of the key initiatives is EU4PAR, which supports PAR. A focus group participant emphasised the centrality of this project: *"The European Union has decided to concentrate support for public administration reform in the hands of one technical assistance project – EU4PAR. And this project has indeed done a lot of useful things, but it also has drawbacks."* While EU4PAR has made important contributions, its concentration of resources also highlights the need for a broader, better-coordinated donor landscape.

2. Donors invest in capacity-building programmes to improve the skills of civil servants, recognising that a capable civil service is essential for effective reform and long-term reconstruction. *"Donors organise training for civil servants to increase their level of expertise, which contributes to the successful implementation of reforms,"* noted one expert. Transparent recruitment mechanisms also help attract skilled professionals to the civil service. *"We have mechanisms to attract such people [to the civil service] through transparent competitions,"* another participant added.

3. Donors fund initiatives that focus on assessing the progress of reform and providing recommendations for improvement. *"International donors finance projects that monitor and analyse the implementation of reforms, which makes them effective*," one CSO representative said. These projects are essential for ensuring accountability and guiding adaptive reform strategies.

However, focus group participants also pointed to shortcomings in donor engagement – particularly in the selection and deployment of international experts. Some expressed frustration that external consultants lacked local knowledge or practical understanding of Ukraine's reform context. *"International partners really do not understand what they are doing and send experts here who have no clue whatsoever,"* one participant remarked.

While donor-funded initiatives help drive reforms, there remain challenges related to coordination, efficiency and project implementation strategies. As previously highlighted, this fragmentation is a significant obstacle to the development of a unified, strategic approach to PAR.

International donors drive PAR in Ukraine through funding, technical assistance and capacity-building programmes, strengthening institutions and governance structures. While challenges remain – particularly in the areas of expert selection and inter-donor coordination – well-managed initiatives have enhanced transparency, improved civil service professionalism and laid the groundwork for a more resilient and accountable public sector, which is vital for Ukraine's reconstruction and European future.

The cooperation between the government and CSOs: openness of data

Open data in Ukraine

Open data is a prime example of the effective collaboration between civil society organisations (CSOs), the government, and international donors – a so-called "golden triangle" – that has driven Ukraine's digital transformation and transparency reforms. It resulted in such initiatives as e-Data (the information analytical system of a transparent budget), electronic public procurement system Prozorro, and DREAM (Digital Restoration Ecosystem for Accountable Management).

Beyond procurement and budget transparency, Ukraine expanded its open data ecosystem to cover land ownership, company registers, public spending, environmental data and urban development. This progress was largely fuelled by collaborative advocacy efforts led by CSOs, which pressured the government to implement open data policies, ensure accessibility and maintain real-time updates on government activities.

Ukraine's proactive stance on open data was also reflected in its impressive standing in international rankings. This refers to its much improved ranking in the Open Budget Index, attributed to the implementation of key open government initiatives, such as expanding the use of public e-procurement tools, making budget expenditures more transparent, and improving digital access to public services. During the full-scale invasion by russia, Ukraine still made key budget information available on Spending.gov.ua (which provides information on all government transactions other than those categorised as defence and security) and Open Budget.

In addition, in terms of open data maturity, Ukraine's efforts culminated in a particularly high achievement in 2022, when the country attained a maturity level of 97%, positioning it second among 35 European nations. This assessment encompassed various dimensions, including policy, impact, portal and quality. The ranking fell somewhat in 2023, but this was due to the fact that many registers were closed to the public or access becoming limited. As a result, the RISE Ukraine coalition wrote several open letters and made appeals to the government and the Ombudsman with a request to make the data public. If data is considered classified, the three-stage procedure should be applied: this means there is a need for clear explanation as to why data is closed and how making the data open would hamper the security of Ukraine. Such questions are needed, because lack of data prevents good decisions being taken on either a local or a national level and, thus it becomes difficult for CSOs to provide policy advice. Without data, the watchdog role of CSOs is also impossible to fulfil.

Overall, open data initiatives in Ukraine have profound implications beyond governance. They contribute to reducing corruption, improving service delivery, strengthening citizen participation and facilitating international investments. However, maintaining and expanding open data projects requires continued donor support, government commitment and sustained advocacy from civil society. As Ukraine progresses towards EU accession, aligning its open data policies with European best practices remains a key priority for ensuring long-term institutional reforms and reinforcing democratic governance.

CSOs advocacy for open data: results from the focus group

To explore the role of civil society in promoting data transparency and digital accountability, a second focus group discussion was held with CSO representatives actively involved in open data initiatives. The discussion centred on how open data supports transparency, anti-corruption efforts and informed decision-making – especially in the context of Ukraine's post-war reconstruction. Participants also shared insights into their cooperation with government bodies and international donors, and highlighted practical challenges in accessing, using and advocating for open data.

The focus group findings confirm that CSOs are key drivers in Ukraine's open data ecosystem. They develop tools for data analysis, advocate for open access to government-held information, and use data to monitor public spending and evaluate policy effectiveness. However, they also face significant constraints: data access has become more limited under the guise of security concerns, open data policies are unevenly enforced, and many donor-funded projects still lack transparency components. These limitations undermine both public oversight and the long-term institutionalisation of open data practices.

The quotes below illustrate the practical experience of CSOs working with open data – from technical implementation to strategic advocacy – underscoring both their contributions and the systemic barriers they encounter.

The role of civil society organisations in openness of data

Civil society plays a crucial role in advocating for open data, developing tools for data accessibility, and using data for policy analysis and decision-making. Through these efforts, CSOs enhance transparency, support evidence-based governance and promote accountability in public administration – especially in the context of post-war reconstruction.

1. Focus group participants emphasised that open data enables CSOs and journalists to track public spending, particularly in reconstruction efforts, and detect corruption and inefficiencies. As one expert explained, *"Open data or access to public information allows you to monitor costs and minimise corruption. Thanks to open data on budgets, tenders and contracts, the public and the media can track reconstruction expenses."* By ensuring transparency in financial flows of massive reconstruction funding, CSOs help prevent corruption and ensure that public funds are used effectively.

2. Civil society actively develops analytical tools, dashboards and platforms that help assess the efficiency of public spending. These tools not only increase transparency but also attract new donors by demonstrating measurable impact. One participant noted, *"New public organisations, new analytical tools and dashboards are being created, which are important for donors to assess impact and estimate future funding needs."* These innovations, such as The Cost of War by the Fiscal Policy Research Center, help improve transparency and strengthen donor confidence. Through these initiatives, CSOs ensure that financial decisions are data-driven and publicly accessible.

3. Open data enables CSOs to coordinate efforts among donors and implementing agencies, reducing inefficiencies and avoiding the duplication of projects. *"Many organisations are ready to finance reconstruction projects, and many organisations are implementers. Simply having all this data organised allows us to avoid repeating certain actions,"* said one expert. This streamlines resource allocation, ensuring that funding is used effectively and that different stakeholders do not duplicate efforts.

4. CSOs play a leading role in advocating for data transparency, pushing for policies that make public administration and donor-funded projects more accountable. One participant highlighted a key issue: *"Donors do not include a mandatory open data component in their projects. This affects the effectiveness of public monitoring."* Additionally, the lack of open data can prevent CSOs from fulfilling their grant obligations, as key information remains inaccessible. *"The public cannot meet the grant requirements because the data is closed,"* another expert noted. CSOs pressure both donors and the government to institutionalise open data as a standard practice, making transparency a non-negotiable component of funded projects.

5. In many cases, CSOs take on data collection, verification and disclosure responsibilities that the state fails to fulfil. This allows for the creation of structured datasets that benefit both the public and international partners. As one participant described, *"We take data, check it, verify it and supplement it with additional information… from the typology of objects to the geocoordinates of each object."* Another noted, *"Public organisations are as active as possible and replace the role of the state because the state is not able to do this."* By filling data gaps, CSOs ensure that reliable, high-quality information is available for decision-making, advocacy and public accountability.

CSOs are the driving force behind data transparency in Ukraine, transforming open data into a powerful tool for accountability, efficiency and informed decision-making. They expose corruption, develop innovative analytical tools, coordinate efforts among donors and implementers, and pressure both government and donors to uphold transparency standards. When the state falls short, CSOs step in – verifying, structuring and publishing essential data. Their work is not just about advocacy; it is about building the very infrastructure for more accountable, transparent and data-driven governance.

Challenges in promoting open data

Despite their active engagement, CSOs face significant challenges in promoting open data that directly affect their ability to hold government accountable and support effective reconstruction.

1. A key issue highlighted in the focus group discussions is the poor quality and limited availability of crucial datasets, especially those related to reconstruction. This makes them difficult to use for monitoring or analysis, which results in a lack of structured data. *"There is almost no open data in reconstruction. This is the key problem we face,"* one participant stated. Even when data exists, it is often unstructured and chaotic, which makes it difficult to use for analysis or public monitoring. *"The data is chaotic, unstructured, and there is no systematic approach to publishing it,"* another expert added.

2. Authorities frequently restrict access to data, citing security concerns, often without valid justification. *"Data closure is justified by security arguments, although they are often false,"* one participant warned. Another observed, *"Any topic can be buried under the claim that there is a 'war risk' involved."* This results in unnecessary secrecy, preventing effective monitoring of public spending and governance during reconstruction.

3. Donor practices also contribute to the problem. International donors often fail to include open data requirements in their projects, making public oversight difficult. As one participant explained, *"At the level of technical assistance projects and grant projects, donors do not include open data components as a mandatory element."* This not only weakens the transparency of donor-funded efforts but also limits the ability of CSOs to fulfil their own monitoring responsibilities. *"Donors often have no idea what open data is and accept reports in spreadsheets instead of raw data."*

4. A lack of accountability mechanisms further complicates the situation. Even when data is legally required to be open, state institutions frequently ignore these obligations without facing consequences. *"There is no mechanism for influencing administrators for groundless non-publication of open data,"* one participant noted. In some cases, authorities justify inaction by claiming limited demand. *"Administrators say that it is not advisable to open data for 10 CSOs,"* another said – failing to recognise that those CSOs represent the broader public interest.

5. The Ministry of Digital Transformation, once a strong proponent of open data, and other key agencies were also criticised for their declining interest in advancing the open data agenda. *"The Ministry of Digital Transformation does not have leverage or political will to activate the field of open data,"* one participant said. This loss of leadership creates a vacuum that further delays progress and disincentivises local governments from investing in transparency efforts.

6. Funding cuts have complicated these issues. "Of all donor assistance, only 8% is allocated for anti-corruption, while previously it was 60%," a participant noted, highlighting how the sharp decline in financial support has made it harder for CSOs to sustain open data and monitoring activities. *"Funding for public monitoring and control has dropped significantly,"* another expert added.

7. A lack of integration between government data sources limits the usability of available information. *"Registers are closed, data interoperability decreases, and analysis becomes more complex,"* one expert observed.

Efforts to promote open data in Ukraine are constrained by multiple, overlapping challenges – ranging from unjustified data closures and fragmented datasets to weak donor requirements and limited enforcement of transparency laws. At a time when open data is crucial for rebuilding public trust, preventing corruption and coordinating reconstruction funding, these obstacles not only limit the impact of CSOs but also threaten the integrity of Ukraine's recovery process. Without stronger legal safeguards, political will and donor commitments, the progress made on data transparency risks being reversed just when it is needed most.

The role of civil society in strengthening open data at the local level

At the local level, CSOs fill gaps in the capacities of communities working with open data as well as help explain why there is a need for open data. Their work has become even more essential in the context of Ukraine's recovery, where data-driven governance is necessary for fair, efficient and community-focused reconstruction.

1. Focus group participants noted that many local administrations struggle to collect, organise and publish data in a structured, usable form. In these cases, they can leverage CSO expertise to systematise data and create standards for structured, transparent information. One participant emphasised, *"Simply having all this data in an orderly form allows us to avoid repeating certain actions."* CSOs develop technical solutions that improve data collection, processing, and analysis, ensuring efficiency in governance. *"We take data, check it, verify it and supplement it with additional information,"* another participant noted. By organising fragmented data, CSOs reduce duplication, improve coordination and ensure that resources are used effectively.

2. By involving CSOs, local administrations can improve transparency, strengthen public trust and increase donor confidence. Transparency fosters credibility, which is vital for attracting investment and ensuring sustained support for local recovery projects. As one expert observed, *"Thanks to open data, the trust of the public and international partners increases… This demonstrates transparent management of funds."* In this sense, open data becomes a strategic tool – not just for accountability, but also for enabling local development and external support.

3. CSOs assist in collecting and verifying data on damaged infrastructure, contractors and public expenditures, filling gaps in government oversight. This includes information about damaged infrastructure, public procurement and spending on reconstruction. *"Public organisations are as active as possible and replace the role of the state because the state is not able to do this,"* one participant said. In many communities, CSOs are the only actors capable of assembling a complete, verified picture of local recovery efforts.

4. Critically, CSOs do not stop at collecting and publishing data – they also advocate for open data policies, demanding that authorities disclose critical datasets needed for public oversight, *"to set a requirement or obligation to the authorities on priority datasets determined by the public,"* one participant explained. This bottom-up approach ensures that data openness reflects actual community needs rather than top-down mandates.

CSOs have an irreplaceable role in strengthening open data at the local level in Ukraine. They are not just intermediaries – they are innovators, data managers, watchdogs and advocates all at once. Where local administrations lack capacity or commitment, CSOs step in to organise data, ensure transparency and link policy decisions to real community priorities. Their ability to merge technical expertise with civic engagement makes them uniquely effective in building transparent, accountable and people-centred local governance. In many cases, without CSOs, open data would not exist at all at the local level – making their contribution not simply valuable but also essential.

Donors' support for open data

International donors' support is essential for the launch of the open data project and for the support of CSOs engaged in transparency and monitoring. However, despite these contributions, donor support often lacks consistency, strategic focus and enforceable commitments to transparency – especially in the context of recovery and reconstruction.

1. Donor funding has enabled the launch of impactful initiatives that collect, process and visualise public data. One example mentioned by focus group participants is *The Cost of War* project, which aggregates data from the treasury and public procurement systems to produce interactive tools that track war-related spending. As one expert noted, *"The Cost of War project collects data from the treasury and procurement, processes it and creates interactive tools."* These tools are essential not only for public awareness but also for donor accountability and oversight.

2. Donors also invest in digital infrastructure to improve data management – particularly information systems that allow for better data management and service delivery. *"Donors support the development of information systems outside the Ministry of Digital Transformation,"* said one participant. However, not all systems developed with donor funding comply with open data principles. In many cases, platforms are designed without requirements for structured, machine-readable data or public access – limiting their usefulness for monitoring and civic oversight.

A critical weakness highlighted by CSOs is the absence of open data requirements in donor-funded technical assistance and grant programmes. *"Donors do not include open data components in their projects as a mandatory element… This complicates public monitoring,"* one expert stated. This oversight is not merely technical – it undermines the very principles of transparency and accountability that donors aim to uphold. This lack of standardisation reduces the effectiveness of CSOs, who are often tasked with evaluating these projects without access to the underlying information. It also sends a conflicting message: while donors promote transparency rhetorically, their own practices do not always reflect these values. For

CSOs working to institutionalise open data as a core element of Ukraine's governance reform and recovery strategy, this disconnect is a major obstacle.

While international donors have been vital in launching Ukraine's open data reforms, their support remains fragmented and often inconsistent with the transparency standards they advocate. Without mandatory open data requirements, many donor-funded initiatives fail to support meaningful public oversight. For open data to remain a cornerstone of Ukraine's reconstruction and anti-corruption efforts, donors must go beyond funding and embed transparency into the design, implementation and evaluation of every project. Anything less risks undermining both the impact of their assistance and the trust of the Ukrainian public.

Conclusions

Civil society organisations play a pivotal role in Ukraine's governance reforms, particularly in PAR and open data initiatives. Their dual role as both partners of the government and independent watchdogs ensures accountability, transparency and responsiveness in policymaking and implementation.

CSOs have been instrumental in driving and monitoring PAR, advocating for higher standards of governance and professionalising civil service. They provide essential policy input, expertise and reform monitoring, playing a crucial role in advocating for transparent, merit-based civil service hiring. Additionally, CSOs support the implementation of donor-driven reforms by bridging gaps between donors and government institutions. However, several challenges persist. The fragmentation of donor support leads to inconsistencies in implementation, as multiple international donors operate with differing priorities. Furthermore, despite active engagement, CSOs often struggle to be formally included in decision-making structures, and high turnover within the civil service, coupled with inadequate financial incentives, reduces the sustainability of reforms. To ensure long-term governance improvements, improved coordination between donors, government agencies and CSOs is essential. Institutionalising CSO participation in policymaking and ensuring adequate resources for reform implementation will further enhance progress.

Ukraine has made significant strides in open data accessibility, with CSOs leading efforts to advocate for and utilise open data for public oversight. Key achievements include the development and promotion of platforms such as e-Data, Prozorro and DREAM, which enhance transparency in procurement and reconstruction processes. By leveraging open data, CSOs have increased public and donor confidence in governance through data-driven monitoring initiatives. However, several challenges threaten these advancements. The government has increasingly restricted access to key datasets under the pretext of security concerns, hindering transparency efforts. Additionally, open data policies often lack effective accountability measures, limiting enforcement. Another key issue is the limited donor emphasis on open data, as many donor-funded projects do not include mandatory transparency components, reducing CSOs' ability to monitor project effectiveness. To maintain and expand Ukraine's open data ecosystem, it is critical to establish clear legal requirements for data accessibility, ensuring government agencies provide structured and open datasets. Strengthening donor commitments to the integration of open data into funded projects and enhancing interoperability between government data sources will further support transparency and oversight.

Despite their substantial contributions, CSOs continue to face structural and financial constraints that limit their effectiveness. Sustainable domestic funding mechanisms, formalised participation frameworks, and stronger government commitments to transparency and accountability are necessary to reinforce civil society's role in governance reforms. Moving forward, fostering stronger collaboration among CSOs, government institutions and donors will be critical in ensuring democratic governance, improving public administration efficiency and maintaining Ukraine's progress towards European integration. Addressing these challenges will allow civil society to remain a driving force in shaping Ukraine's reform trajectory.

Recommendations

The development and implementation of reforms in Ukraine are often supported by international technical and international support. This also applies to the activities of CSOs: either as partners of the government or local communities, or as watchdogs. At the same time, the activities of CSOs are predominantly financed by international donors. Therefore, in order to build sustainable effective reforms and then to monitor their implantation, there is a need for effective coordination of the government, CSOs and international donors. To ensure that international assistance contributes to transparent, effective and accountable governance in Ukraine – especially in the context of large-scale reconstruction – donors should strengthen their support for civil society and institutionalise open data and PAR as cross-cutting priorities. Based on the analysis and focus group discussions, the following recommendations are proposed:

1. Require implementing partners and government institutions to publish project-related data in open, machine-readable formats. Transparency should be a condition, not an option, in any initiative involving public or donor funds.

2. The government should work with other international partners to harmonise transparency and open data standards. Fragmentation in donor approaches reduces the efficiency of aid, leads to duplication and undermines efforts to build long-term governance systems.

3. Donors should fund programmes that help public institutions – including local governments – develop the capacity, tools and infrastructure to systematically collect, manage and publish data. Support should go beyond pilot projects to embed open data practices within governance systems.

4. Donors should provide long-term, flexible funding for CSOs. CSOs are essential watchdogs and reform partners, but many operate with short-term, project-based funding. Donors should support the institutional sustainability of CSOs engaged in monitoring, advocacy and civic tech development – especially those working in the regions.

5. Donors should ensure the involvement of local CSOs in project design and evaluation. Civil society actors should not only implement donor-funded initiatives but should also be involved in shaping them from the start. Their expertise and contextual understanding are crucial for ensuring relevance, transparency and community engagement.

6. The government, local authorities and donors should invest in digital public infrastructure aligned with open governance principles. They should prioritise digital platforms – such as public procurement, reconstruction tracking and budget transparency tools – that are built on open-source technologies, ensure public access and allow independent verification of data.

7. All stakeholders should focus on coordination mechanisms between donors, government and civil society. Encourage the creation or reinforcement of multi-stakeholder platforms to align reform priorities, improve project coordination and reduce duplication. These platforms should include civil society as equal stakeholders, not just beneficiaries.

8. All stakeholders should monitor and evaluate transparency outcomes – not just outputs. Go beyond checking boxes on data publication and evaluate how information is used in decision-making, oversight and public engagement. Invest in metrics and tools that measure the impact of transparency and civic engagement.

9. All stakeholders should protect and promote access to data during wartime and recovery. Encourage Ukrainian authorities to apply clear, proportionate criteria when restricting data access due to security concerns. Donors should advocate for the restoration of access to essential datasets and support legal reforms that safeguard the public's right to information.

10. Donors should publish their own project data – budgets, beneficiaries, results – in open formats, and align with Ukraine's open data standards. This transparency will reinforce trust and set the standard for others to follow.

Appendix: Methodology

This study utilised a qualitative research approach to investigate issues surrounding open data and public administration reform (PAR) in Ukraine. Two separate online focus groups were conducted, one for each topic. The focus groups were conducted in line with the activities and methodologies of the RISE Ukraine coalition on the preparation of the second edition of the Donor's guidebook. Several additional questions were added for the purpose of this report.

Each focus group included seven to nine participants and one moderator, ensuring focused discussions and a diversity of perspectives. The discussions were guided by tailored moderator guides, which included specific questions about accountability, challenges, gaps, successful initiatives and recommendations in the field of the discussion.

The analytical framework was adapted to examine the interplay between transparency, accountability, and institutional practices in these domains, informed by prior studies on civic engagement and governance.

Data collection included thematic questions that encouraged participants to share experiences, challenges and recommendations related to open data and PAR. The focus group on open data explored how open data contributes to accountability and transparency during Ukraine's recovery efforts. Participants discussed challenges in accessing and using open data, gaps in the sector, successful case studies of open data usage in monitoring recovery projects, and recommendations for international partners to improve collaboration and support. Meanwhile, the focus group on PAR examined issues related to governance, stakeholder collaboration and the effectiveness of reform initiatives.

Each group included representatives from civil society and subject-matter experts, ensuring diverse perspectives. Participants were selected for their active engagement in open data projects and PAR at local and national levels. This selection ensured a rich variety of insights and practical examples. Discussions were conducted over 90 minutes via a secure online platform to ensure accessibility and safety, recorded with participants' consent and later transcribed for analysis.

The data was analysed using artificial intelligence (e.g., ChatGPT) to identify recurring themes, gaps and innovative solutions.

Ethical standards were upheld throughout the research. Participants provided informed consent, and data confidentiality was ensured. While the focus groups offered in-depth insights, the findings may not capture all stakeholder experiences across regions. Additionally, the online format could have limited the participation of individuals with restricted internet access. The absence of in-person interaction may have limited certain forms of engagement.

This methodological approach enabled the study to generate a nuanced understanding of the challenges and opportunities in leveraging open data and advancing PAR, bridging gaps in understanding and providing actionable insights to inform policy and practice and enhance transparency and governance.

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Auswärtiges Amt

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