ACREC

ANTI-CORRUPTION
RESEARCH & EDUCATION
CENTRE

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

Oksana Nesterenko, Andrey Beletskyi (ACREC NaUKMA)
Max Bader (Leiden University)

CONTENT

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 Anti-corruption 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 anti-corruption 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». .

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

The traditional approach to fighting corruption has often been seen in strengthening mechanisms of horizontal accountability in the public sector.[1] 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'.[2]

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.[3] 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.[4]

Many civil society organizations monitor the operations of individuals or institutions that are known to be corrupt or that are at risk of becoming corrupted.[5] 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

1   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 Reinner, 29-51.

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

3   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

4   Carr, Indira, and Opi Outhwaite. «2011. The role of non-governmental organizations (NGOs) in combating corruption: Theory and practice.» Suffolk UL Rev. 44: 615; Johnsøn, 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.

5   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.

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.[6]

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.[7] 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.[8] 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.[9]

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.[10]

6   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.

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

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

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

10   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.

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, in which ordinary people, typically at the municipal level, decide how to allocate public funds.[11] Activists can also be invited by the government to provide advice on a more or less permanent basis, for instance by joining expert councils.[12]

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.

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.

---

11   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.

12   Tisné and Smilov, op.cit., p.19

2. ACTIVITIES AND IMPACT OF REGIONAL ACTIVISTS

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.[13]

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' NGO 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 60 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.

---

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

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: awareness-raising, monitoring and reporting, 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.

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.[14] 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.

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

---

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

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 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.[15] 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.[16] 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.[17] 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.

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.[18] In another example, an organization from Chernihiv has successfully lobbied for amendments to existing regulations aimed at making the regulations less prone to abuse.[19]

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.[20] Demonstrations organized by anti-

15   Zakon Ukrayiny 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, 14 December 2018, Kropyvnytskyi

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

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

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.[21] In another example, activists in Kharkiv directly confronted the proprietors of an illegal gas station in the city forcing them to close their business.[22]

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, 6 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.[23] 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.[24]

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

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

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

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

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 60 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 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 none-theless 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.[25]

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.[26] An organization from Dnipro has prevented the illegal cutting of trees.[27] And activists from Drohobych have been instrumental in imposing fines on stores which sold alcohol illegally.[28]

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

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

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

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

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

(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.[29] 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.[30] 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.[31] 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.[32]

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 region, for instance, anti-corruption instruments were adopted following trainings on integrity in public administration conducted by an organization from Ivano-Frankivsk.[33] 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.[34] An organization from Kherson successfully lobbied the introduction of more transparency in tenders by universities in the city.[35] 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.[36]

---

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

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

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

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

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

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

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

36 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

3. 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.[37]

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.[38]

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.[39] 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.[40] And in Zaporizhzhia, civil society organizations 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.[41]

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.

---

37   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

38   Interview with representative of civil society organization, 27 October 2018, Khmelnitskyi; interview with representative of civil society organization, 29 May 2018

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

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

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

In Chernihiv, for instance, activists have been included in a working group that has drafted a new set of anti-corruption regulations.[42] 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.[43]

In some places including Drohobych, Khmelnitskyi, 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.[44] 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.[45] 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 instances, 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."[46] 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". [47]

Centralized corruption, by contrast, is characterized by concentrated executive authority.[48] 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

---

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

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

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

45 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.

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

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

48 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.

ensure their political dominance over a sustained period.[49] 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".[50] 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.[51] In another example, an activist has argued that Odesa's mayor uses selective anti-corruption prosecution to punish the perceived disloyalty of his "clients".[52] 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.[53]

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.

49   Stefes, op.cit., p.29

50   Ibidem

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

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

53   See https://transparentcities.in.ua/en/reytingi-prozorosti-mist/kartki-mist

4. THE IMPORTANCE OF CAPACITY STRENGTHENING

Next to political will, another variable with a significant impact on the effectiveness of anti-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.[54] **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 NGO representatives from small towns often relocate to regional capital cities (whether or not to work for similar organizations) and successful NGO 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.[55] 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. **60 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

---

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

55 Ilko Kucheriv Democratic Initiatives Foundation, "Hromadyanske suspilstvo v Ukrayini: vyklyky i zavdannya", retrieved at https://dif.org.ua/article/gromadyanske-suspilstvo-v-ukraini-vikliki-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

the sustainability of civil society organizations in Ukraine.[56] 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 Foundation, 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 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.[57] 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.[58] 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.[59] 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

---

56 The Index also notes that the 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

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

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

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

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 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.[60] 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.[61]

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

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

CONCLUSIONS

1. There are two main challenges for local anti-corruption organisations: (a) lack sufficient capacity in terms of financial and human resources to be effective. Without sufficient funding, anti-corruption organizations cannot hire necessary staff and services, and have fewer opportunities to acquire knowledge and skills that could help make their work more effective, (b) many organisations lack a credible support base. They are far from the ideal type of community-based organizations that represent the interests of their members and contribute to building social capital. Most of them instead typically rely on the dedication of one to five activists. Because they do not have a substantial support base, anti-corruption organizations, like many other types of civil society organisations in Ukraine, cannot mobilize supporters to help them advance their cause and are often seen as lacking legitimacy to promote change for the public good.

2. Our findings show that most effective anti-corruption organisations tend to be those that convincingly solve either one of these two challenges. Some organisations solve the capacity challenge by attracting sustained and substantial funding, typically in the form of international assistance, allowing them to hire core staff, purchase professional services, and give time for planning. Other organisations solve the support challenge by drawing from a real base of support, such as the workers of an organization or a group of people directly affected by a certain type of abuse.

RECOMMENDATIONS:

• We recommend 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.

• Field research should be conducted 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.

• It is crucial 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 NGOs 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.

• Seminars and webinars on grant applications preparation should be organised for regional and local NGOs.

• 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.

The projects envisaging cooperation between local and national non-governmental organisations should comprise of 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.

- Supporting institutional development of local anti-corruption coalitions.

- Supporting project activities envisaging engagement of the representatives of local authorities and NGOs on the basis of equal partnership.

- 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.

REFERENCES

1. Abers, Rebecca. 1998. "From Clientelism to Cooperation: Local Government, Participatory Policy, and Civic Organizing in Porto Alegre, Brazil." Politics & Society 26 (4): 511–37

2. 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)

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

4. 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

5. Carr, Indira, and Opi Outhwaite. «2011. The role of non-governmental organizations (NGOs) in combating corruption: Theory and practice.» Suffolk UL Rev. 44

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

7. 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.

8. 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

9. 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

10. 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

11. Ilko Kucheriv Democratic Initiatives Foundation, "Hromadyanske suspilstvo v Ukrayini: vyklyky i zavdannya", retrieved at https://dif.org.ua/article/gromadyanske-suspilstvo-v-ukraini-vikliki-i-zavdannya.

12. Johnsøn, 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.

13. Malena, Carmen, Reiner Forster, and Jammejay Singh. 2004. Social Accountability An introduction to the concept and emerging practice. The World Bank Social Development Paper no. 76

14. 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

15.   Olken, Benjamin A. 2007. "Monitoring Corruption: Evidence from a Field Experiment in Indonesia." Journal of Political Economy 115 (2)

16.   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

17.   Smulovitz, Catalina, and Enrique Peruzzotti. 2000. "Societal Accountability in Latin America." Journal of democracy 11(4)

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

19.   The Index also notes that the 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

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

21.   Wampler, Brian. 2008. "When Does Participatory Democracy Deepen the Quality of Democracy? Lessons from Brazil." Comparative Politics 41 (1)

22.   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)

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)
Dnipropetro-vska	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

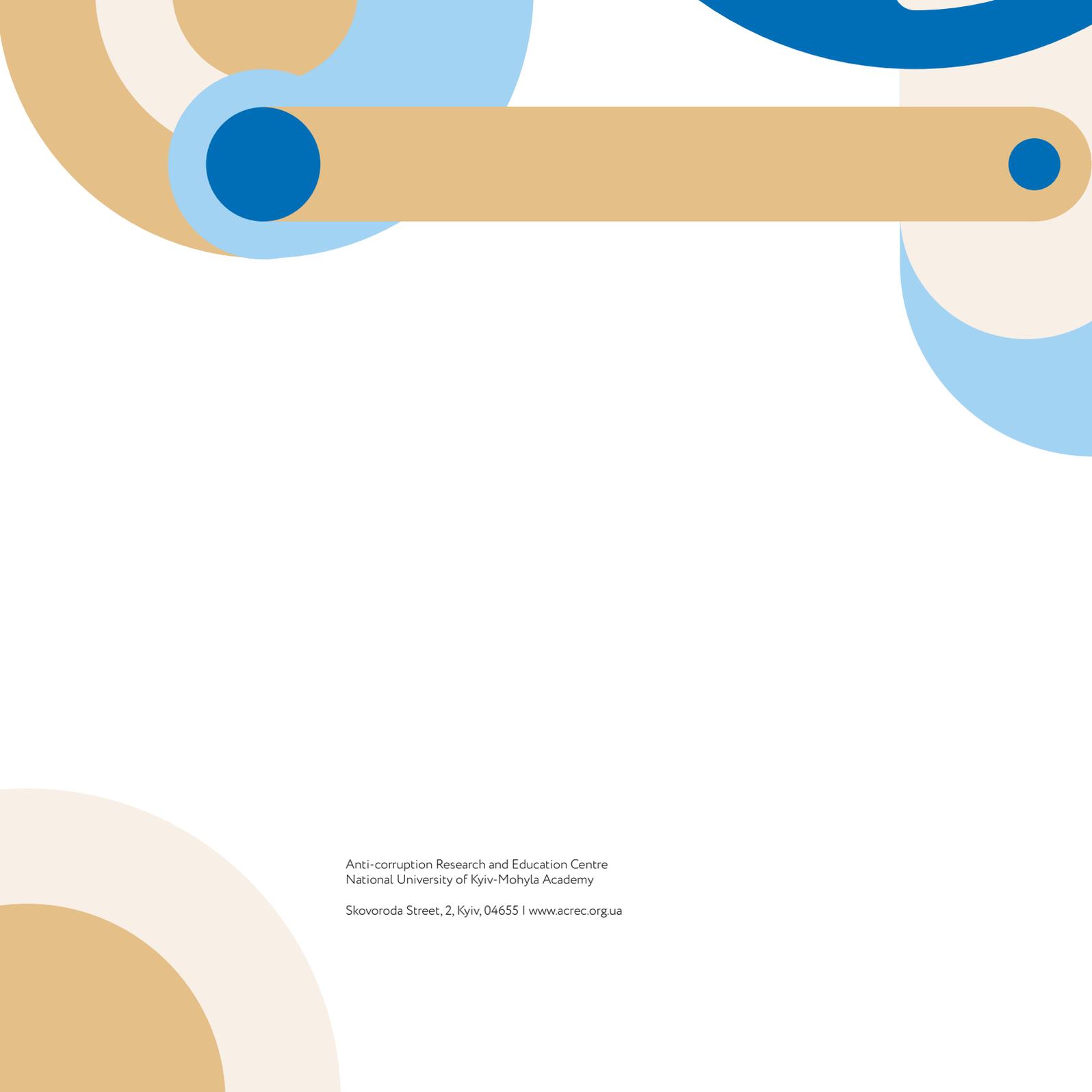| REGION	NUMBER OF ANTI-CORRUPTION CSOS IN A REGION	LEVELS OF IMPACT OF ANTI-CORRUPTION CSOS IN A REGION (HIGH/MEDIUM/LOW)	CITY/TOWN	NUMBER OF LOCAL ANTI-CORRUPTION CSOS	LEVELS OF IMPACT OF LOCAL ANTI-CORRUPTION CSOS (HIGH/MEDIUM/LOW)
Khersonska	16	medium	Kherson	15	high
			Kozachi Lakheri	1	low
Kyivska ⁑	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
Luhanska	8		Kreminna	1	low
			Lysychansk	4	low
			Rubizhne	2	low
			Starobilsk	1	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)
Donetska	25	low	Bakhmut	1	low
			Kramatorsk	4	low
			Sviatohirsk	1	low
			Sloviansk	6	low
			Mariupol	7	low
			Sievierodonetsk	5	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

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)
Kirovohradska (Kropyvnyts-koho)	9	medium	Kropyvnytskyi	9	medium
Sumska	12	medium	Sumy	12	medium
Lvivska	13	medium	Drohobych	4	medium
			Lviv	9	medium
Cherkaska	7	low	Korsun-Shevchenkivskyi	1	low
			Monastyryshche	1	low
			Cherkasy	5	low
Khmelnytska	5	medium	Khmelnytskyi	5	medium
Volynska	5	low	Rozhyshche	1	low
			Lutsk	4	low
Rivnenska	8	medium	Antonivka	1	low
			Rivne	7	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)
Ivano-Frankivska	3	low	Ivano-Frankivsk	3	low
Ternopilska	8	medium	Ternopil	8	high
Zakarpatska	4	low	Mukacheve	1	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.