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Public Governance Review of Ukraine

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Foreword

Governments around the world are faced with multiple challenges, including technological change, population ageing, and narrowing fiscal space, as well as consecutive crises including the COVID-19 pandemic and geopolitical tensions. They are also confronting declining public trust and increasing expectations for responsive, reliable, open and accountable governments that can deliver for citizens and businesses. Together, these pressures demand that governments strengthen and modernise their structures to effectively assess, design, co-ordinate and implement policies that meet the needs of citizens and stakeholders in a timely and efficient manner. Meeting these challenges requires transformation in multiple areas of government, including, but not limited to, planning and collaboration across agencies, stakeholder and citizen participation, evidence-informed policies and the use of AI and advanced technologies.

Ukraine faces these challenges in an extreme form. Since Russia's war of aggression in February 2022, the country has endured devastating human losses, massive economic damage, and the forced displacement of millions of its citizens. Yet, in the face of this extraordinary pressure, Ukraine's government and public servants have demonstrated remarkable resilience: maintaining institutional continuity, sustaining essential public services, and continuing to advance an ambitious reform agenda to transform and modernise government. Ukraine's commitment to democratic governance, public administration reform, and European integration has not wavered. The demands of wartime have accelerated the need for a more coherent, capable, and human-centred government, one that can support recovery, involve citizens and stakeholders in public decisions, drive reconstruction, and advance reform progress in line with EU integration and with its growing partnership with the OECD.

This OECD Public Governance Review of Ukraine assesses Ukraine's central public governance system and supports the implementation of its public administration reform agenda as part of the OECD Global Relations and Co-operation Directorate (GRC) Country Programme of Ukraine. As agreed with the Government of Ukraine, the Review addresses key priority and cutting-edge areas of public governance: institutional resilience, planning and co-ordination, information integrity, citizen and stakeholder participation, the future of the civil service, and the use of artificial intelligence in government operations and service delivery. The Review builds upon OECD public governance standards, frameworks and comparative insights from across OECD member countries and beyond as well as ongoing OECD SIGMA (Support for Improvement in Management and Governance) work with Ukraine. Based on this analysis, the Review provides Ukraine with sequenced, actionable recommendations to strengthen the resilience, effectiveness and democratic quality of its public administration, in support of both its immediate recovery needs and its long-term development and goals. The analysis in this Review is based on evidence collected up to March 2026.

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The Review was co-ordinated by Simon Callewaert and Elïna Smetanina from GIP; Sarah Babay prepared the manuscript for publication and controlled the quality.

A number of authors drafted the report. Chapter 1 on Resilient Public Governance in Ukraine was drafted by Elïna Smetanina, Arnault Prêtet, and Simon Callewaert. Chapter 2 on Strengthening Planning for Ukraine's Recovery and Long-Term Goals was drafted by Simon Callewaert with insights from Martins Krievens. Chapter 3 on Reinforcing Information Integrity was drafted by Craig Matasick, Liudas Zdanavičius, and Charles Baubion. Chapter 4 on Citizen Participation was drafted by Ollin Pérez-Raynaud and Charlotte Denise-Adam. Chapter 5 on The Future of the Public Service in Ukraine was drafted by Alana Baker with insights from Lech Marcinkowski. Chapter 6 on AI in Government was drafted by Joaquin Collao, Piret Tõnurist, and Seong-Ju Park.

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Abbreviations and acronyms

ADM	Automated Decision-Making
ANZSOG	Australia and New Zealand School of Government
APS	Australian Public Service
AVMSD	Audiovisual Media Services Directive (EU)
CAF	Common Assessment Framework
CAIO	Chief AI Officer
CCD	Center for Countering Disinformation
CDTO	Chief Digital Transformation Officer
CEPR	Centre for Economic Policy Research
CMU	Cabinet of Ministers of Ukraine
CoE	Council of Europe
CoG	centre of government
CPB	Citizen Participation Barometer (OECD, forthcoming)
CSO	Civil Society Organisation
CTO	Chief Technology Officer
DITP	Interministerial Directorate for Public Transformation (France)
DOZORRO	Civil society procurement monitoring platform (Ukraine)
DPI	Digital Public Infrastructure
DREAM	State Platform for Recovery Management (digital recovery tracking system)
DTA	Digital Transformation Agency (Australia)
EU	European Union
FIMI	Foreign Information Manipulation and Interference
GDP	Gross Domestic Product
GDPR	General Data Protection Regulation (EU)
GMPP	Government Major Project Portfolio (UK)
GOCEEI	Government Office for Co-ordination of European and Euro-Atlantic Integration
GP	Government Programme
GPA	Government Performance App (UK)
GPAP	Government Priority Action Plan
GSG	General Secretariat of the Government (Romania)
HITL	Human-in-the-Loop
HRM	Human Resource Management
HRMIS	Human Resource Management Information System
HRMMU	UN Human Rights Monitoring Mission in Ukraine
ICCPR	International Covenant on Civil and Political Rights
ICT	Information and Communications Technology
IDP	Internally Displaced Person
IFES	International Foundation for Electoral Systems
IMF	International Monetary Fund
IMI	Institute of Mass Information (Ukraine)

IREX	International Research and Exchanges Board
KPI	Key Performance Indicator
KIIS	Kyiv International Institute of Sociology
L&D	Learning and Development
LCS	Law on Civil Service
LGBTQI+	Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersex and other identities
LLM	Large Language Model
LKYSPP	Lee Kuan Yew School of Public Policy
MAPFU	Ministry of Agrarian Policy and Food of Ukraine
MCSC	Ministry of Culture and Strategic Communications
MDCT	Ministry for Development of Communities and Territories
MDT	Ministry of Digital Transformation
MES	Ministry of Education and Science
MOD	Ministry of Defence
MOZ	Ministry of Health
MSPU	Ministry of Strategic Industry of Ukraine
MTEF	Medium-Term Expenditure Framework
NAUCS	National Agency of Ukraine on Civil Service
NATO	North Atlantic Treaty Organisation
NCCC	National Coordination Center for Cybersecurity
NCTRB	National Council on Television and Radio Broadcasting of Ukraine
NDP	National Development Plan
NIRS	National Information Resources Service (Korea)
NPAA	National Programme for the Adaptation of Ukrainian Legislation
NSG	Network of Schools of Government (OECD)
NSDC	National Security and Defence Council (Ukraine)
OECD	Organisation for Economic Co-operation and Development
OGP	Open Government Partnership
OHCHR	Office of the United Nations High Commissioner for Human Rights
OSCE	Organisation for Security and Co-operation in Europe
OSINT	Open-Source Intelligence
PAR	Public Administration Reform
PARS	Public Administration Reform Strategy 2022–2025
PC	Public Council
PFMS	Public Finance Management Strategy 2022–2025
PILOTE	Performance monitoring dashboard (France)
PIM	Public Investment Management
PKC	Cross-Sectoral Co-ordination Centre (Latvia)
PMDU	Prime Minister's Delivery Unit (UK)
PSLC	Public Service Leadership and Capability (OECD Recommendation)
RDC	Reconstruction Design Council (Japan)
RDO	Reforms Delivery Office
RIA	Regulatory Impact Assessment
RoP	Rules of Procedure (Cabinet of Ministers of Ukraine)
SARID	State Agency for Restoration and Infrastructure Development
SBU	Security Service of Ukraine
SCMU	Secretariat of the Cabinet of Ministers of Ukraine
SDG	Sustainable Development Goal
SGDSN	Secrétariat général de la défense et de la sécurité nationale (France)
SIGMA	Support for Improvement in Governance and Management (OECD/EU initiative)
UNDEF	United Nations Democracy Fund
UNDP	United Nations Development Programme

UNESCO	United Nations Educational, Scientific and Cultural Organization
UNHCR	United Nations High Commissioner for Refugees
URC	Ukraine Recovery Conference
VIGINUM	Service de vigilance et de protection contre les ingérences numériques étrangères (France)
WINWIN	Digital Innovation Development Strategy until 2030 (Ukraine)
ZMINA	Ukrainian human rights centre

Executive summary

Ukraine's governance system has demonstrated extraordinary resilience in the face of Russia's war of aggression, which, since February 2022, has caused more than 15,000 civilian casualties, displaced nearly 6 million citizens abroad, and inflicted direct damage exceeding USD 170 billion. Despite these pressures, Ukraine has maintained functioning institutions, continued implementing public administration reforms and regulations, and advanced its EU accession agenda. Yet, the war has deepened structural vulnerabilities, eroding public trust, straining fiscal capacity, and widening gaps in strategic co-ordination, that sustained governance reform must address.

Building resilience into Ukraine's governance

Ukraine's government has shown remarkable capacity to absorb wartime shocks while maintaining core functions and delivering for citizens. The Diia digital platform, Ukraine's flagship government app providing access to over 150 public services, has over 20 million registered users, and 84% of e-government service users reported a very positive experience in 2024. The vast majority of actions under Ukraine's Public Administration Reform Strategy were completed in 2024, including the expansion of administrative service centres (ASCs) and the digitalisation of key public services through the Diia platform. However, wartime pressures continue to strain institutional capacity, including through staff losses, fiscal reorientation toward defence, and constraints on transparency under martial law. Looking ahead, sustaining the resilience of Ukraine's governance will require embedding agility and human-centred service delivery into the next reform cycle, ensuring that martial-law restrictions are applied proportionately and reversed once conditions allow, and investing in accountability and citizen engagement as the foundations of renewed public trust.

This review examines five priority areas, selected in agreement with the Government of Ukraine, where governance reform can turn that resilience into lasting institutional strength: strategic planning, information integrity, citizen participation, the civil service, and artificial intelligence in government. For each area, this executive summary sets out high-level reform directions; more detailed, sequenced, and operationally specific recommendations, structured around immediate priorities, recovery and reconstruction measures, and long-term development actions, are set out in the respective chapters.

Strengthening planning for Ukraine’s recovery and long-term goals

Effective strategic planning is a prerequisite for Ukraine's recovery: without it, reconstruction risks being fragmented, donor-driven, and disconnected from the country's long-term development ambitions. Ukraine has demonstrated commitment to building a more coherent planning system, and important foundations are in place. However, institutional responsibilities remain blurred, planning documents lack a clear order of priority, and the links between strategy, budgeting, and performance are underdeveloped. Strengthening these connections is essential if Ukraine is to translate its political commitments into funded, accountable action, and to ensure that recovery serves as a springboard for long-term reform rather than a temporary fix.

Ukraine could consider:

- Clarifying institutional leadership for strategic planning at the centre of government, with a clear mandate to steer priorities and ensure coherence across ministries.
- Establishing a clear order of priority among planning documents, ensuring that national objectives cascade consistently to sectoral, regional, and local levels.
- Strengthening the links between planning, budgeting, and performance monitoring to ensure strategies are fiscally grounded and results-oriented.
- Increasing transparency and public accountability over recovery planning, building on existing digital tools to track progress and engage citizens and businesses.

Reinforcing information integrity

Ukraine faces systematic information warfare as part of Russia's broader aggression, making information integrity both a national security and a democratic governance priority. Since 2014, Ukraine's World Press Freedom ranking improved from 97th to 62nd, Ukraine is navigating a delicate balance between national security and freedom of expression including with martial law restrictions, and financial pressures threaten independent media. Reinforcing information integrity must be grounded in democratic values and continue the country's ongoing reforms while appreciating its unique context.

Ukraine could consider:

- Clarifying roles of institutions tackling information integrity or creating a central agency with the authority to monitor threats, co-ordinate responses, and ensure cross-sector oversight.
- Ensuring restrictions introduced under martial law are applied transparently and proportionately, with a clear post-war roadmap for restoring freedoms.
- Strengthening the financial sustainability of independent and local media through diversified domestic funding mechanisms.
- Scaling up media and information literacy programmes as part of a whole-of-society resilience approach.

Deepening citizen participation

Despite wartime pressures, Ukraine's democratic tradition and active civil society have enabled meaningful participation in public decisions, with public consultation events surpassing pre-war levels in 2024. The new Law on Public Consultations adopted in 2024 and amendments to legislative requirements for participation at the local level mark an important step but call for all levels of government to strengthen implementation capacities.

Ukraine could consider:

- Strengthening the legal and institutional foundations for participation by operationalising recent laws on public consultations and local self-government through building public sector capacity at all levels, clarifying institutional roles and responsibilities, and building a culture of participation.
- Establishing a unified, strategic approach to participation in collaboration with civil society by anchoring it in national-level priorities and whole-of-government coordination mechanisms.
- Delivering more meaningful and innovative participation opportunities to all groups of society in practice by developing a "one-stop-shop" knowledge hub, launching a cross-government digital participation platform, strengthening monitoring and accountability, diversifying methods to reach under-represented groups (e.g., internally displaced persons), and scaling deliberative democracy pilots.

Developing a future-ready civil service

Ukraine's civil servants have shown outstanding commitment throughout the war, but merit-based recruitment has been suspended, around 31 600 posts remain unfilled, and skills shortages are acute. A significant salary reform was signed into law in June 2025.

Ukraine could consider:

- Resuming merit-based, open and transparent recruitment competitions as soon as security conditions permit.
- Building a coherent, system-wide learning and development architecture under NAUCS leadership, aligned with recovery and EU integration priorities.
- Developing and deploying competency frameworks across the public service, starting at leadership level.
- Addressing demographic imbalance at senior levels, with a clear pathway toward the NAUCS goal of 40% women in senior posts by 2030.

Leveraging artificial intelligence for effective and trustworthy public services

Ukraine's advanced digital transformation, including the Diia platform and the Trembita interoperability system, provides a strong foundation for AI adoption in government. Strategic frameworks are in place, but formal AI governance remains nascent: no oversight body exists, risk assessments are not mandatory, and technical standards are absent.

Ukraine could consider:

- Establishing a permanent central co-ordination mechanism for AI in government, building on the WINWIN AI Centre of Excellence and the Chief AI Officer role.
- Operationalising ex-ante and ex-post impact assessments for AI systems, prioritising high-risk applications, and introducing requirements for algorithmic transparency and human oversight.
- Developing a Law on AI aligned with the EU AI Act, providing legal certainty for both public sector deployment and private sector innovation.
- Investing in shared digital public infrastructure to enable responsible, scalable AI adoption across government.

1. Resilient public governance in Ukraine

Ukraine's public governance has shown remarkable resilience in response to Russia's war of aggression. This chapter highlights how Ukraine's governance adapted under pressure. It is structured in three parts: the first focuses on the wartime impact on public governance in Ukraine; the second identifies key actions taken to strengthen government resilience throughout the wartime; and the third highlights the need for Ukraine to continuously invest in public trust and democratic resilience of its governance. The chapter links to the topics explored in subsequent chapters of the Review, underscoring the importance of democratic, resilient and human-centred public governance for Ukraine's recovery, EU integration and long-term growth and development.

1.1. Introduction: Ukraine's public governance in a wartime context

Russia's war of aggression against Ukraine has had a devastating impact on Ukrainian lives and the economy. Since February 2022, at least 14,999 civilians have been killed and 40,601 injured (HRMMU, 2025[1]), although actual numbers are likely considerably higher. Widespread destruction has displaced people and businesses across and beyond Ukraine's borders. As of December 2025, nearly 6 million Ukrainian citizens have been registered as refugees globally (UNHCR, 2025[2]) and more than 3.6 million people have been internally displaced (International Organization for Migration, 2025[3]). Between 2021 and 2023, mobilisation and displacement led to a 40% reduction in the working-age population, even accounting for the partial return of those initially displaced abroad (OECD, 2025[4]). The destruction of 13% of the total housing stock has impacted more than 2.5 million households. Losses in the housing sector alone, including additional rental costs for displaced citizens, demolition and waste removal, and increased public expenditures, are estimated at USD 26.8 billion (Kyiv School of Economics, 2026[5]). By the end of 2024, direct war-related damage across sectors accounted for 170 billion US dollars (USD), an evaluation that is set to increase as the war continues (World Bank, 2025[6]). Beyond direct physical damage, the broader economic losses from the conflict, encompassing lost income, reduced output and additional war-related costs across all sectors, are estimated at USD 0.6 trillion in value added terms through the end of 2026, equivalent to more than three times Ukraine's pre-war GDP (Kyiv School of Economics, 2026[5]).

Ukraine's public sector has borne the full weight of wartime impacts. These range from the physical attacks on public servants and infrastructure destruction to fundamental shifts in priorities, operations and financing across all levels of government. According to the National Agency of Ukraine on Civil Service, at least 5,134 public servants have been captured in temporarily occupied or active war territories, 140 killed during the full-scale war and 4,316 drafted to the Armed Forces of Ukraine (National Agency of Ukraine on Civil Service, 2024[7]). Although it represents only a small fraction of total damage, destruction to Ukraine's public administration's infrastructure is estimated at USD 433.2 million, with total financial losses in the public sector at least USD 2.8 billion (World Bank, 2025[6]). Sharp increases in defence spending and taxes have widened deficits and raised public debts, as noted in the *OECD Economic Survey of Ukraine* (OECD, 2025[4]) Defence financing alone increased nearly tenfold between 2021 and 2022, from approximately USD 4.4 billion to USD 38.5 billion, and had reached approximately USD 68.9 billion by 2025 – figures that illustrate the extraordinary fiscal reorientation the war has demanded (Kyiv School of Economics, 2026[5]). This in turn has put pressure on meeting public spending needs while the war continues.

To ensure continuity of operations and maintain reform implementation, Ukraine's public service leveraged agile working practices and built on high government digitalisation. Russia's regular cyber-attacks against Ukraine since 2014, targeting media, energy, business, financial, non-profit and public sectors (European Parliament, 2022[8]), compelled the public administration of Ukraine to adopt unconventional communication approaches, such as alternative email systems and personal phone messengers. These new working practices enabled faster issue resolution for Ukraine's public administration, though it often lacked procedural formality.

The war has also altered public policy and administrative procedures. Defence and security, the economy, recovery, EU integration and social cohesion have moved to the top of the government's agenda (Cabinet of Ministers of Ukraine, 2025[9]). In the midst of war, Ukraine has also been reforming its veteran, health, digital and infrastructure policies while facing challenges such as decreasing public trust and little opportunity for long-term strategic vision (Hres and Balanchuk, 2025[10]). The *Law on the Legal Regime of Martial Law* was enacted on the first day of the full-scale war. It introduced a "special legal regime" that provides state, military and local self-government entities with the powers needed to repel threats to Ukraine's independence and territorial integrity (Verkhovna Rada, n.d.[11]). The Law also places temporary limits on the constitutional rights and freedoms of individuals and legitimate interests of businesses (Verkhovna Rada, n.d.[11]). Under martial law, the government of Ukraine adapted its administrative procedures, including rules governing how public authorities are organised, accountability and reporting

requirements, and employment and procurement processes (OECD, 2024[12]) (OECD, 2025[4]). Some of these measures, as highlighted by the *2023 SIGMA Monitoring Report of the Public Administration in Ukraine* (OECD, 2024[12]), have had a negative impact on the performance of the Ukrainian public administration, especially when it concerns transparency and openness. As the war continues, the government of Ukraine will need to continue to guarantee that the imposed restrictions are being applied proportionally and fairly and are not used for discriminatory purposes (OECD, 2024[13]).

Under the constant pressure of war, Ukraine's civil servants – the workforce of the government – have shown strong resilience and commitment. Individually and collectively, they have continued working and driving progress even when that progress faces near-constant setbacks. They have been continually facing war-related security risks while simultaneously managing heavy workload stemming from the rapidly changing environment. Additionally, low and fragmented pay, high turnover rates, salary freezes and cuts to budget since the beginning of the war have further strained the public service (OECD, 2025[4]).

Responding to the war has also demanded changes in Ukraine's government machinery. The government assigned the Ministry for Communities and Territories Development key responsibilities for restoration policies. This evolved in the merger of the two agencies - the State Agency for Infrastructure Projects and State Agency for Motor Roads - into a single entity named the State Agency for Reconstruction and Development of Infrastructure, which now manages recovery projects for housing, energy, and military infrastructure alongside road maintenance. With the objective of consolidating public entities and transferring functions so as to strengthen Ukraine's economic potential and wartime response (President of Ukraine, 2025[14]), the government reshuffle in July 2025 brought further changes to the government composition. In this regard, the Economy, Agriculture, and Environment portfolios were merged into one Ministry of Economy, Environment and Agriculture.

This chapter acknowledges the resilience of Ukraine's public administration under extraordinary pressure. While the war has tested the country's people, institutions and policy frameworks, the government has shown remarkable capacity to adapt. Following a discussion of crucial actions that have helped the Ukrainian government preserve public governance throughout the ongoing war, the chapter turns to resilience in the longer-term. It draws on the analysis from the main topics selected for this *Public Governance Review of Ukraine* – namely, strategic planning, information integrity, citizen participation, the public service and AI use in internal operations and public service delivery - emphasising the importance of continued and future action to strengthen public institutions and reinforce resilient democratic governance, underpinned by public trust. The chapter builds on the OECD work with Ukraine, notably the *2023 SIGMA Monitoring Report of the Public Administration in Ukraine* (OECD, 2024[12]), the *2025 Economic Survey of Ukraine* (OECD, 2025[4]) and the *2025 Integrity and Anti-Corruption Review of Ukraine* (OECD, 2025[15]).

1.2. Ukraine's public governance response: A demonstration of resilience

Since the full-scale invasion began, resilience has emerged as a defining characteristic, evident not only in Ukrainian society but also the government's response to wartime adversities (United Nations, 2025[16]), (Bidenko, 2025[17]). In the context of public governance, resilience refers to the capacity of government systems to withstand disruptions while continuing to deliver outcomes for citizens (OECD, 2021[18]) Strengthening this capacity requires continuous investment in institutions, processes and co-ordination mechanisms that can adapt under pressure and recover swiftly.

Building upon the OECD's work on public governance resilience (Box 1.1), the following sections illustrate the actions that Ukraine has taken to shape the resilience of its public governance. This illustrates how the government mobilised resources, personnel and expertise to respond effectively to wartime challenges. They reflect both pre-existing measures and wartime adaptations and offer practical insights for strengthening resilience in Ukraine and beyond. While the individual impact of each element is difficult to

quantify, taken together, they provide a valuable lens for understanding government resilience through crisis.

Box 1.1. The concept of public governance resilience

Resilient governments adapt to and recover from shocks while maintaining their core functions

Resilience in governance refers to the capacity of systems to absorb and recover from disruptions and adapt to changing conditions while maintaining the same public functions. Resilient governments can withstand disruptions that affect their inputs (such as civil servants, funds and infrastructure) and processes (policy making, budgeting, service delivery, and others). They act to minimise disruption impact and efficiently maintain operations throughout the disturbance and recovery phase. Resilient governments learn from the disturbance, its absorption and the subsequent recovery, aiming to adapt the governance inputs, processes and mechanisms to better respond to future challenges. Hence, resilient governments implement anticipatory risk management and preparedness and response strategies for future disruptions.

More regular and complex crises require continuous investments in government resilience

The operating environment for governments is evolving with persistent and interconnected, rather than transitory, crises becoming a norm. This reality, shaped by a complex mix of geopolitical, economic, technological, social and environmental changes, compels governments to maintain and constantly improve service delivery and outcomes for citizens. The COVID-19 pandemic and Russia's war of aggression against Ukraine stand as a direct example of this environment, constituting a significant stress test for many countries, but particularly Ukraine.

Democracies should strengthen their government resilience without costs to public trust and transparency

Democratic government resilience to shocks requires responses both at speed and scale while upholding democratic standards and principles. This requires governments to mobilise, innovate and plan its disruption response and put in place governance mechanisms that maintain transparency and boost public trust in government institutions.

Source: (OECD, 2021[18]), (OECD, 2023[19])

Functioning institutions

Throughout the war, Ukraine has kept its government institutions operational. While day-to-day work has been affected by the war, the Cabinet of Ministers of Ukraine (CMU) maintained its policy making and co-ordination functions. For instance, weekly and ad-hoc meetings have allowed the government to take more rapid and effective decisions. The Parliament of Ukraine, the Verkhovna Rada, continued holding regular, in-person sessions and implemented its annual Plans of Legislative Work.

By maintaining its governance frameworks, Ukraine absorbed the shocks of war and accelerated its recovery. From February 24, 2022 to the beginning of 2026, the Verkhovna Rada adopted more than 1000 laws, and the CMU issued around 6000 resolutions and 5000 decrees. These actions safeguarded policy implementation, and enabled adjustments to social, education and employment policies with defence efforts and public needs (Marchuk, n.d.[20]). These legislative and policy measures enable Ukraine to respond to changing priorities and needs as the war continues.

Prioritisation and planning

Since the first days of the war, the government of Ukraine has demonstrated flexibility in prioritisation and planning. Prioritisation is an indispensable planning tool for governments that enables credible promises and consistent delivery (OECD, 2024[21]), even amid resource constraints. Wartime conditions have forced Ukraine's government to constantly reconfigure its activities and priorities, often doing it with limited time and resources.

To this end, Ukraine's Government Priority Action Plan (GPAP) has played a key role in supporting wartime policy prioritisation. Traditionally a tool to translate the Government Programme's medium-term objectives into annual actions, the GPAP has become Ukraine's central planning document during the full-scale war. Instead of adopting separate recovery plans, a practice tested in 2022, the government aligned policies under the GPAP, providing strategic direction from 2023 to 2025. This approach reduced duplication and avoided wasting resources on parallel strategies. The GPAP now brings together critical actions across domains, including wartime response, recovery, and EU integration reforms. Importantly, the government continues integrating international obligations into its annual GPAPs to ensure a holistic planning approach. However, as a short-term document, the GPAP cannot replace the medium- to long-term recovery strategies needed for sustainable growth and development.

Reliable service delivery and communication

The government of Ukraine has ensured reliable service delivery to its citizens and businesses. The *2023 SIGMA Monitoring Report* commended the government's ability to restore services quickly and, in some cases, even expand the accessibility of its services in the first months of the war (OECD, 2024[12]). As the war continues, the number of provided services has returned to the pre-war level, with over 20 million citizens served by the Administrative Service Centres (ASCs) network in 2024 (Diia, 2024[22]). Citizen satisfaction with received services has been growing despite the ongoing war. In 2024, for example, 84% of state e-government service users reported very positive experiences, an increase by 5 percentage points from 2023 (78.5%) (Kyiv International Institute of Sociology, 2025[23]).

The resilience of Ukraine's public services during the war is a direct result of its hybrid delivery model, developed through transformative reforms since 2014. This system, which combines digital platforms with physical one-stop-shop centres, has allowed citizens to access services in a convenient way. In this manner, the Unified State Web Portal of Electronic Services (Diia portal), the main digital government platform, has facilitated continuous access to over 150 services via its website and 60 services through its mobile application. The number of Diia users has reached 20 million, representing roughly half of Ukraine's population (Diia, 2024[24]). Ukraine continues expanding its ASCs network, a trend already documented in the 2023 SIGMA's assessment (OECD, 2024[12]) The number of ASCs in Ukraine grew by 210 since the latest SIGMA report, reaching 1,337 centres by the end of 2024 (Diia, 2024[22]). 32 mobile ASCs have allowed citizens to receive administrative and social services in more remote regions and reclaimed territories. In complement, 82 Diia Centres provide crucial information on basic administrative services, online service support and business advice to visitors.

Beyond service delivery, Ukraine's advanced government digitalisation has supported the continuity of its internal administrative and communication processes. Launched in 2020 and crucial during the COVID-19 pandemic, the "Trembita" interoperability system enables interdepartmental data exchange between state bodies and local self-government bodies. This in turn allows citizens and businesses to access services and communicate with public authorities. The system is actively developing, with more than 290 government institutions and organisations being part of it and 14 billion transactions made up to 2024. Amidst the war, the government has faced challenges in the system adoption, such as connectivity smoothness for state agencies, which the government is trying to overcome through the development of a new version. The "Trembita 2.0" aims to further align with international standards, improve connectivity and strengthen security.

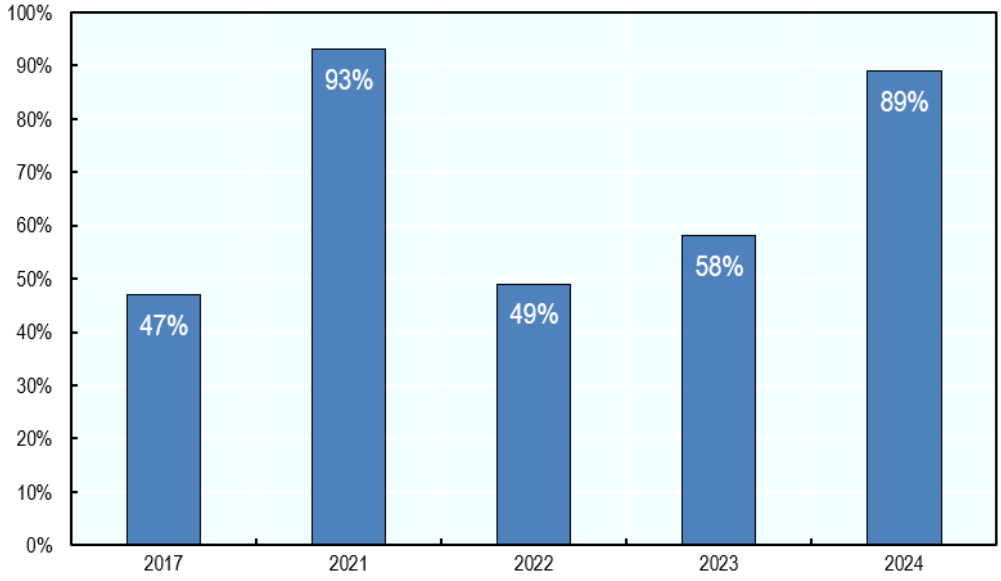
Advancing the public administration reform agenda

In addition to bolstering its institutions, policy prioritisation and delivery to citizens during the war, the government of Ukraine has continued to prioritise public administration reform (PAR). A well-functioning and effective public administration is of paramount importance for a country's resilience as it ensures policy implementation and assists decision makers in crisis response.

Ukraine's public administration modernisation agenda, structured around the *Public Administration Reform Strategy 2022–2025* (PARS) and the *Public Finance Management Strategy 2022–*2025 (PFMS), has remained a top government priority. The PARS strives to establish a professional, efficient, effective, and accountable public administration system aligned with European standards to enhance governance, service delivery, and trust in state institutions (Cabinet of Ministers of Ukraine, 2021[25]). The PFMS complements PARS by focusing on building "a modern, sustainable and effective public financial management system" (Ministry of Finance, 2021[26]). Both strategies set policy objectives, define actions, specific indicators and targets and establish clear responsibility and timelines for implementation. Despite wartime disruptions, Ukraine shows continued commitment to PAR reform. Using SIGMA's methodology, the implementation rate of both strategies has been growing, reaching 89% in 2024 (Figure 1.1).

Figure 1.1 Since 2022, the implementation rate of PAR-related initiatives is rising (2017-2024)

% of fully implemented activities during the years indicated.



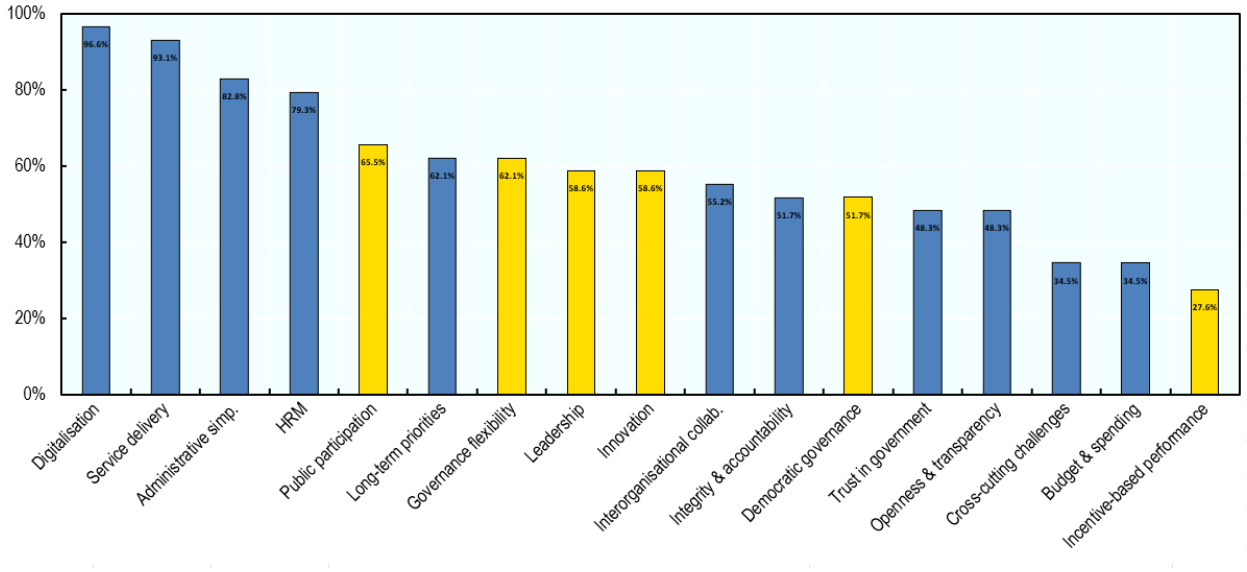
Note: The 2024 data do not include the Public Finance Management Strategy 2022-2025 measures that were temporarily suspended or required additional time due to wartime circumstances.
Source: (OECD, 2024[12])for 2017-2022. Author's own calculations for 2023 and 2024 based on the annual monitoring reports for the *Public Administration Reform Strategy 2022-2025* and the *Public Finance Management Strategy 2022-2025*.

Two key enablers - a comprehensive strategic framework and established co-ordination mechanisms - have been essential for progressing on PAR despite the ongoing war. According to the latest SIGMA report, both PARS and PFMS cover all areas of the *SIGMA Principles of Public Administration* (OECD, 2024[12]) OECD analysis also shows alignment between Ukraine's priorities for PAR and those of OECD Members (Figure 1.2). Importantly, the PAR framework has helped Ukraine both implement reforms and align with EU accession objectives. In addition, the PAR agenda continued to benefit from improved management, leadership and co-ordination mechanisms since SIGMA's assessment (OECD, 2024[12]) The high-level

PAR Co-ordination Council has driven implementation across government. While co-ordination is already strong, more regular meetings could further improve effectiveness. As PARS and PFMS near completion in 2025, the upcoming public administration reform agenda provides an opportunity to embed resilience more systematically into Ukraine's governance model, for example through commitments on participation, agility, leadership and innovation up to 2030.

Figure 1.2. Ukraine's PAR agenda largely address the thematic areas OECD countries include in their public administration modernisation (PAM) plans, with the areas in blue being fully integrated and yellow partially addressed in Ukraine's PAR.

% of OECD countries focusing on a particular policy area within their PAM initiatives.



Note: n=30 OECD countries. Thematic areas in blue fully addressed in Ukraine's Strategy for Public Administration Reform in Ukraine for 2022-2025 and the Public Finance Management Strategy 2022-2025; in yellow, areas moderately addressed and necessitate further improvements.
Source: Authors' own elaboration based on desk research.

External support and partnerships

Collaboration with external stakeholders can be instrumental to increase the quality of policies and expand capacities to implement government priorities (OECD, 2023[27]). Ukraine's strategic and continuous investments in partnerships with allied countries, international organisations and businesses have mobilised broad international support. The support secured has helped fortify Ukraine's government, strengthening its internal morale and enabling the funding of essential functions. Many international partners interviewed reported collaborative relationship with Ukraine's authorities despite the ongoing war.

Over the last three years, Ukraine has seen large inflows of humanitarian, technical and financial assistance. From 2022 to 2025, Ukraine received a continuous flow of financial and humanitarian aid, with a total value of about EUR 80 billion per year (Kiel Institute for the World Economy, 2025[28]). As showcased in the *OECD Economic Survey of Ukraine*, grants and loans from foreign partners helped fund the current account deficit (OECD, 2025[4]). Nearly USD 4.5 billion in foreign direct investment made up2.5% of Ukraine's GDP in 2023, and USD 3.1 billion entered the country in the first three quarters of 2024 (OECD, 2025[4]). By working together with the United Nations Refugee Agency and other partners, Ukraine's Ministry for Communities and Territories Development has been able to roll out multi-service protection centres to provide tailored administrative assistance for especially vulnerable people (UNHCR, 2025[29]).

While external assistance has been critical for Ukraine's wartime response, long-term development will require a more balanced approach to financial management.

1.3. Looking ahead: Ensuring resilience for the longer-term

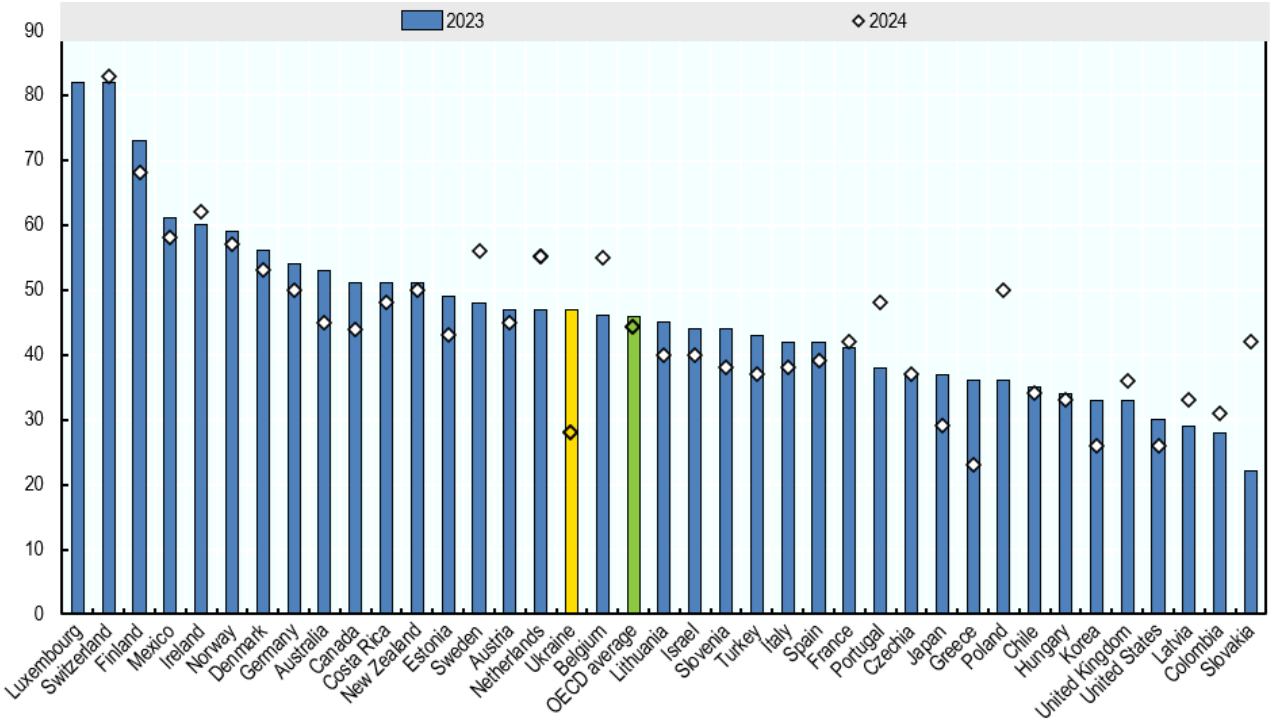
While Ukraine's government has demonstrated incredible resilience in response to Russia's full-scale war, further efforts are needed to build stronger democratic governance for the future. Recovery, modernisation and EU integration will require Ukraine to continue strengthening its democratic governance, ensuring that public institutions are accountable and responsive to all citizens' needs. Maintaining democratic resilience requires strong and high-quality institutions that ensure representative government and citizen participatory engagement and protect fundamental rights, while implementing governmental checks and balances and enhancing an impartial administration (OECD, 2023[19]). As highlighted in the *OECD Economic Survey of Ukraine*, the country faces a range of widespread challenges, from massive economic and infrastructure damages to labour and energy shortages, population displacement and increasing poverty (OECD, 2025[4]) Addressing these issues will require responses that are not only resilient but also stable, accountable, and people-centred.

An overarching issue is the practical challenge Ukraine has faced in maintaining democratic processes during wartime. Citizens consistently report a strong aspiration for Ukraine to evolve into a fully functioning democracy (National Democratic Institute, 2024[30]). The high societal approval of Ukraine's European integration course is also strongly associated with the country's democratic future, rule of law and human rights (Kyiv International Institute of Sociology, n.d.[31]), (Kyiv International Institute of Sociology, 2025[32]). At the same time, security risks and institutional constraints raise concerns about transparency, accountability, and the feasibility of reforms. To this end, defence efforts and the restrictions put in place by martial law have frozen various reform efforts (OECD, 2025[4]). Some of the newly adopted or changed laws, including the *Law on Public Consultation*, are structured to take full effect only after martial law ends. Looking forward, Ukraine's democratic future will depend on the successful implementation of democratic reforms and public trust in the chosen path forward.

The erosion of public confidence in government highlights a critical need to strengthen democratic resilience in Ukraine. Confidence in the national government has been fluctuating in Ukraine, from 24% in 2014 to 21% in 2021, with the highest point at 37% in 2019 (Gallup World Poll, 2023[33]). Following the start of the full-scale war, public confidence in the government soared, reaching the highest 62% in 2022 (Gallup World Poll, 2023[33]). This tendency, explained by the "rally around the flag" effect, has helped Ukraine boost both resilience and responsiveness to the aggression in the first year. While Ukrainian public confidence in national government was above the OECD average in 2022, Ukraine experienced a declining trend in public trust as the war continued to 47% in 2023 and to 28% in 2024 (Figure 1.3). This drop poses a significant challenge for Ukraine's government as it signals a growing gap between what citizens expect and what institutions deliver. Improving trust levels can support reform implementation and unite people around shared vision, both critical to Ukraine's prosperous post-war trajectory.

Figure 1.3. Public confidence in its national government has eroded in Ukraine between 2023 and 2024, staying below OECD average

% of people who answered "yes" to "Do you have confidence in the national government?".



Source: (Gallup World Poll, 2023[33]); (Gallup World Poll, 2024[34]).

Related to this, promoting public sector integrity is essential for strengthening democratic resilience in Ukraine. The *OECD Integrity and Anti-Corruption Review of Ukraine* underscored Ukraine's significant progress in the fight against corruption even during the full-scale war (OECD, 2025[15]). The government has made strides in fostering transparency, accountability and integrity through measures like open data, digitalisation and independence of anti-corruption entities (OECD, 2025[15]). The commitment to fight corruption and accompanying reforms have translated into a robust public integrity framework that shows high compliance with OECD standards (OECD, 2025[15]). Moreover, Ukraine has been successful in decreasing public experience of everyday corruption, with 15% of citizens reporting they have experienced corruption in 2024 compared to over 70% in 2015 (OECD, 2025[15]).

Nevertheless, corruption risks remain very high in Ukraine in the context of the war. Massive displacement of people and businesses, market disruptions and the need to restrict public access to certain information due to security risks are a few factors that can aggravate corruption risks. Citizens' perception of corruption remains high, and their desire for justice has reached historic levels. To this end, 92% of citizens consider corruption as a severe national issue and intolerance of corruption has risen to 54% in 2024 (OECD, 2025[15]). In July 2025, Ukrainians held their first public protest since the full-scale war began, gathering after the lawmakers adopted a bill that would significantly limit the powers of the anti-corruption bodies. The several days protests, which occurred despite the martial law ban on assembly, underscored the significant importance of integrity to Ukrainian people and compelled lawmakers into reversing the legislation.

To continue boosting democratic resilience through anti-corruption measures, Ukraine needs to invest into a coherent public integrity system. This requires enhancing implementation, results-orientation monitoring

and evaluation of the anti-corruption framework, fostering a culture of integrity in the public sector and improving accountability of public policy making (OECD, 2025[15]), among the other measures to fight against corruption.

Beyond addressing these broad governance challenges, Ukraine must take additional steps to reinforce public trust and democratic resilience. This report, the *Public Governance Review of Ukraine,* focuses on specific measures, supporting transformative reforms and strengthening democratic governance in Ukraine. The rest of this chapter summarises the governance topics covered in this Review, including planning capabilities, information integrity, citizen participation to public service development and the use of artificial intelligence (AI) in internal operations and public services.

Coherent planning system

Ukraine's long-term recovery and EU integration depend on a **coherent planning system** across institutions and levels of the government. *Chapter 2* of the Review examines Ukraine's existing planning practices, identifying crucial actions to develop a comprehensive framework that will support Ukraine's democratic recovery and resilience in the years ahead. While Ukraine has addressed short-term wartime priorities, sustainable development depends on combining immediate crisis response with long-term, whole-of-government planning (OECD, 2023[19]). To build its democratic future, Ukraine must have plans that are coherent, transparent and responsive to citizens.

Information integrity

Given rapid and unprecedented developments in the information space, democratic governance can be threatened by the spread of false or misleading information, outlining the importance of **information integrity** as discussed in *Chapter 3.* Ukraine is a target of systematic disinformation attacks (EUvsDisinfo, 2025[35]), which seek to undermine public trust in government institutions, among other goals. To strengthen resilience, Ukraine must balance efforts to counter threats in the information space with the protection of democratic freedoms, in particular freedom of expression. To safeguard the foundational elements of consensus-building, namely, freedom of expression and open debate, democratic countries need to implement policies that guarantee transparency, accountability and plurality of information sources (OECD, 2024[36]) In addition, this requires fostering societal resilience and upgrading governance measures to maintain the integrity of the information space (OECD, 2024[36]). This includes policies aimed at building digital, media and information integrity on individual basis and strengthening collaborative relationships between the public, civil society and the government. Building upon the *OECD Recommendation on Information Integrity*, *Chapter 3* reviews the approaches of the Ukrainian government to combatting disinformation and proposes tangible recommendations in alignment with the three policy pillars of the Recommendation.

Citizen participation

As discussed in *Chapter 4*, a core strength of democratic governance lies in enabling **citizen participation** throughout the policymaking cycle. This includes electoral processes, institutionalised consultation mechanisms, social dialogue, and broader forms of civic engagement (OECD, 2023[19]). In Ukraine, strong public demand for involving different people has persisted throughout the war, pushing the government to expand participation while balancing security concerns. *Chapter 4* reviews Ukraine's initiatives aimed at strengthening participation and proposes practical steps to support policymaking that addresses different people's needs both during and after the war. Meaningful public involvement, and confidence that citizens' views influence decisions, are key drivers of trust (OECD, 2024[37]). In future disruptions, the most resilient governments will be those that embed citizen input in both crisis response and long-term planning (OECD, 2021[18]). In Ukraine's case, tailoring engagement to reflect diverse regional needs, which have been

shaped unevenly by the war, will be particularly important (International Organization for Migration, 2025[38]).

Civil service

Democratic resilience is not possible without **public servants** that uphold democratic principles and values and are effective and resilient as individuals as underlined in *Chapter 5*. It further relies on a learning culture that supports continuous, career-long development across all levels of the administration (OECD, 2023[27]). Building on SIGMA's work in public service, *Chapter 5* of this Review further supports the government of Ukraine in its public service development, a long-standing priority for Ukraine. The Chapter identifies the most-needed skills for Ukraine's future and suggests procedures that support the learning and development system of public administration. Interviewed stakeholders during OECD fact-finding process stressed the importance of EU-related knowledge among Ukrainian public servants to accelerate the integration process. Ukraine will benefit from investing in the development of skills and capabilities that is aligned across government and forward looking, allowing public servants to embody innovation and resilience.

Trustworthy AI for more effective governance

Chapter 6, the final section of this Review, supports the government of Ukraine in leveraging **AI for effective and responsible internal operations and service delivery**. Transforming businesses and citizen daily life, AI provides massive opportunities also for public governance. It can allow governments to increase their productivity in policymaking and service delivery, boost the ability to anticipate social trends and user needs and enhance oversight and risk detection (OECD, 2024[39]) Considering existing and future workforce challenges and recovery needs, it is vital for Ukraine's government to further integrate AI in its public administration to foster its responsiveness, productivity and resilience. For example, by automating routine administrative tasks, AI can facilitate the strategic reallocation of Ukraine's public workforce towards more productive sectors of the economy. Ukraine's extensive experience with rapid and effective digitalisation reforms can be a pivotal enabler for the government to maximise the use of AI in the public sector. However, as a democracy, Ukraine must ensure that AI deployment is transparent, accountable, and risk sensitive. *Chapter 6* assists the government of Ukraine to this end.

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2. Strengthening planning for Ukraine's recovery and long-term goals

This chapter examines Ukraine's evolving approach to strategic planning in the context of war and recovery and offers targeted policy recommendations to support a more coherent and forward-looking planning system. Building on Ukraine's demonstrated institutional resilience, the chapter assesses the current state of planning and identifies key governance gaps that hinder the country's ability to prioritise and deliver on urgent recovery and reform goals. It outlines four interdependent priorities to reinforce Ukraine's planning system: clarifying institutional roles and leadership, defining a hierarchy of development priorities, improving the quality and alignment of strategies, and strengthening performance monitoring and accountability. Drawing on international recovery experiences and international good practices, the chapter provides guidance for building a planning architecture that is nationally owned, strategically sequenced, and fit for both post-war recovery and long-term development.

2.1. Setting the scene: planning for the recovery and for the long-term

Russia's full-scale invasion of Ukraine has inflicted devastating human, social and economic consequences on the country, while placing extraordinary demands on its government. Despite these unprecedented pressures, Ukraine's government has demonstrated resilience by preserving institutional continuity and maintaining essential governance functions. However, the complexity of the recovery ahead, coupled with Ukraine's aspiration to join the European Union, requires a more structured, strategic, and unified approach to planning across the public sector. Planning during wartime, for recovery, and for the longer-term must ensure that government priorities are clear, resources are used effectively, and societal needs are met in a coherent and transparent manner. Strategic planning is not just an administrative exercise; it is a vehicle for rebuilding the country's future.

Ukraine must navigate a triple challenge: rebuilding essential infrastructure and services as part of its reconstruction efforts, advancing reform progress in line with EU integration, and maintaining macroeconomic stability and social cohesion in the context of fiscal constraints and wartime volatility. To meet these challenges, the recovery process must be not only fast but also forward-looking, nationally owned, and strategically sequenced. However, persistent fragmentation in planning roles, limited capacities across ministries, and the proliferation of development partner initiatives have revealed some structural weaknesses in Ukraine's current planning approach. These gaps risk undermining coherence and reducing the government's ability to implement its most urgent priorities.

In the context of war and limited resources, Ukraine's current approach to strategic planning remains more a collection of parallel documents and activities than a cohesive system. While important formal procedures have been introduced in recent years, notably the Government Priority Action Plan (GPAP), which has helped translate political priorities into operational directions even during wartime, these efforts are not yet consistently applied, lack legal hierarchy, and are not guided by a unified vision. Institutional responsibilities for planning are fragmented, and many planning instruments continue to operate in silos, disconnected from budgeting processes or performance frameworks. This chapter does not assess Ukraine's planning system as fully developed but instead seeks to support the emergence of one: a more integrated and coherent planning architecture capable of guiding recovery and reform.

If well-organised, strategic planning can serve as a roadmap for national recovery, turning vision into action, rebuilding trust, and enabling Ukraine to move from survival to sustainable renewal. Drawing lessons from international recovery experiences, such as Japan's long-term governance response to the 2011 Great East Japan Earthquake (see Box 2.1), can help Ukraine develop the governance structures and strategic clarity needed to steer a coherent and forward-looking recovery that serves all Ukrainians. Japan's experience highlights the importance of institutional co-ordination, planning across multiple phases of recovery, and sustaining political commitment, challenges also faced by Ukraine. This means ensuring coherence across planning documents, linking plans with budgets and public investment pipelines, and integrating performance monitoring systems that focus on outcomes rather than processes in a war context and in a recovery context.

To that end, this chapter identifies three interdependent priorities to reinforce the strategic planning system and drive the reform and recovery process:

- Further formalising and clarifying roles and responsibilities on strategic planning by identifying and empowering a leading institution steering planning efforts as part of a complex and polycentric national planning system, to replace the current fragmented approach and bring greater coherence to planning responsibilities across government. This is even more important in a recovery and reconstruction context to ensure all efforts are mobilised and aligned towards common objectives and use of resources.
- Establishing a coherent and prioritised planning architecture by defining a clear hierarchy of planning documents and priorities across governance levels and timeframes. This includes

embedding quality assurance and review mechanisms, ensuring alignment with national budgets and capacity realities, and strengthening cross-sectoral co-ordination at early stages of planning.

- Strengthening performance management and monitoring systems to reinforce accountability for results and support real-time adjustments based on implementation progress.

By focusing on these three foundational and interlinked elements, Ukraine can build a strategic planning system that is not only fit for post-war recovery, but also aligned with EU accession requirements and capable of supporting long-term development for its citizens and businesses, as post-war economic recovery will be one of the fundamental drivers for overall future of Ukraine (OECD, 2025[1]).

To operationalise these three priorities, this planning chapter is structured around a detailed assessment of Ukraine's existing strategic planning landscape. Followed by an assessment of key enablers and obstacles, including institutional leadership and co-ordination, the quality and alignment of planning processes, and the role of public participation and multi-level governance. Next it outlines ways to institutionalise more robust performance monitoring and evaluation mechanisms across government. Each section concludes with targeted recommendations to support Ukraine's recovery objectives through a more strategic, coordinated, and outcome-driven planning approach. The chapter concludes with a consolidated set of recommendations to strengthen the overall strategic planning system. These recommendations support a future-oriented planning model that is institutionally anchored, prioritised, and performance-based.

2.2. Strengthening the strategic planning framework of Ukraine to support recovery and reconstruction efforts

Current fragmentation and challenges

Ukraine has taken initial steps toward strengthening its strategic planning approach since 2018, with several institutional and procedural improvements gradually helping to increase co-ordination and structure in government planning. The introduction of the Government Priority Action Plan (GPAP) as an annual implementation tool, the refinement of the Cabinet of Ministers' Rules of Procedure (RoP), and the establishment of a medium-term framework for planning represent tangible progress. Notably, many of these procedures have remained operational despite the immense pressure of Russia's full-scale invasion, underscoring the resilience and institutional maturity of Ukraine's governance system. As the recent SIGMA monitoring report (OECD, 2024[2]) noted, sectoral strategies have gradually improved in quality, and legal frameworks for policy co-ordination and planning have been reinforced.

While Ukraine's strategic planning efforts have made progress in recent years, significant challenges remain. The 2024 SIGMA assessment (OECD, 2024[2]) found that the overall quality of policy planning has improved since 2018, particularly due to enhanced regulatory frameworks for sector strategies (SIGMA Principle 3). Basic requirements for strategy preparation, including objectives and cost estimates, have been formalised and applied in practice, and reporting obligations have expanded to include sectoral strategies and EU integration commitments (SIGMA Principles 3 and 5). However, the assessment also highlights that Ukraine lacks a formal hierarchy of planning documents and clear legal provisions defining their type, timeframe, and coherence mechanisms. As a result, the Rules of Procedure (notably Articles 57 and 87) remain the main regulatory basis for strategic planning, despite covering only limited elements such as GPAP preparation and strategy submission. One of the core issues is thus the absence of a unified legal and procedural framework that defines the hierarchy of planning documents, delineates institutional roles, and establishes co-ordination mechanisms to steer the system. This fragmentation continues to hinder the effectiveness of Ukraine's strategic planning approach, particularly under conditions of war and recovery, where coherence, prioritisation, and alignment with EU integration processes (Principle 4) are essential. This reflects the importance of strategic coherence and institutional clarity outlined in the SIGMA

Principles of Public Administration (OECD, 2023[3]) and in the OECD Policy Framework on Sound Public Governance (OECD, 2020[4]), which highlight the need for integrated planning and co-ordination across the public administration to support resilient governance systems.

While a comprehensive planning law has been discussed in Ukraine since early 2000s, with a draft circulated by the Ministry of Economy, Environment and Agriculture since early 2024, there is no consensus on the immediate necessity across institutions. In August 2025, the Government approved the Concept of the National Strategic Planning System (Cabinet of Ministers' Order No. 853), which outlines a pathway for building the system through the adoption of a law on strategic planning. According to information provided by the Ministry of Economy, a questionnaire survey among members of a dedicated Working Group (composed of representatives of the Ministry of Economy, Ministry of Finance, Ministry of Development, Ministry of Defence, and the Secretariat of the Cabinet of Ministers) found that 65% of respondents consider it necessary to legally establish the system and hierarchy of strategic planning documents at the national level, and 71% consider it necessary to legally embed the principle of cascading higher-level national objectives (defined in the long-term development strategy) into other strategic documents. Stakeholders consulted in the fact-finding phase of this Review nevertheless emphasise that decrees, rules of procedure, and specific regulations may be more appropriate to strengthen and codify the existing system before embedding it in law. This approach aligns with the OECD findings that legal frameworks should evolve based on tested practice rather than be put in place prematurely. Few OECD member countries have a law on strategic planning in place, and most rely on well-established institutions, roles and procedures embedded in manuals, guidelines and decrees.

In contexts with limited capacity and dynamic reform needs, governments can benefit from more flexible instruments such as decrees and procedural guidance that enable adaptation while institutional roles are clarified, and performance mechanisms are strengthened. These instruments can provide much-needed structure while allowing for adaptability, particularly given the shifting priorities linked to recovery, EU integration, and long-term development. This approach would not prevent Ukraine from doing inventory of the existing laws and regulations and cutting down historic baggage that has proven to be non-working. At the same time, the Government has committed, through the Concept of the National Strategic Planning System (adopted by CMU Order No. 853 of 13 August 2025), to codifying roles and responsibilities in a new framework law. While this is a welcome development, the Concept is framed primarily around socio-economic planning, and it will be important to ensure that cross-cutting national priorities such as security, green transition, and EU accession are fully integrated. According to the Ministry of Economy, only legislation can provide the necessary legal basis for clarifying institutional mandates, in line with the Constitution of Ukraine.

The fragmentation of Ukraine's strategic planning system is compounded by blurred mandates and overlapping responsibilities among key actors, including the Secretariat of the Cabinet of Ministers of Ukraine (SCMU), the Ministry of Finance (MoF), the Ministry of Economy, Environment and Agriculture (MoECO), and other line ministries. Each contributes to planning in different ways, and since 2021 the SCMU has been vested with coordination powers under the CMU Rules of Procedure. In particular, the SCMU ensures methodological support for the preparation of government programme documents and monitors their implementation (§60), and during expert review verifies draft acts for consistency with programme goals, checks for overlaps, and assesses the realism of objectives and indicators (§52). The 2021 amendments to the Rules of Procedure have contributed to improvements in strategy quality by standardising requirements and enabling SCMU to provide structured methodological support, including consultations and recommendations, to central executive bodies during the drafting process. Nevertheless, the proliferation of uncoordinated planning documents persists, and a clearer delineation of roles across institutions remains needed to support coherence and delivery.

Stakeholders consulted during the fact-finding phase of the Review and responses to the OECD questionnaire indicate that the current institutional arrangements lack clarity. For instance, roles in approving and coordinating strategies are inconsistently assigned, with overlaps observed between SCMU

and the Ministry of Economy, Environment and Agriculture. This is particularly evident in the implementation phase, where neither institution holds a definitive mandate for ensuring cross-ministerial delivery. At the same time, there are cases where mandates are already more clearly defined: for example, under the Ukraine Facility Plan, the Ministry of Economy serves as National Coordinator with powers set out in law and secondary legislation. This illustrates both the importance and the limits of current arrangements: some functions are regulated, while others remain fragmented. While the Concept of the National Strategic Planning System sets out to define these institutional roles through law, practical arrangements for whole-of-government coordination will remain essential. Ensuring that these roles are defined from a whole-of-government perspective, and not only within the socio-economic domain, will be essential.

Given this complex institutional configuration, it is essential to clarify roles and responsibilities across government to reduce duplication and ensure coherence. The overview below outlines the main bodies currently engaged in strategic planning and recovery governance:

- **Secretariat of the Cabinet of Ministers of Ukraine (SCMU)**: The main centre-of-government body supporting daily Cabinet operations and responsible for preparing the Government Programme, the Government Priority Action Plan, and the medium-term action plan. Since 2021, SCMU has also been vested with coordination functions under the CMU Rules of Procedure, including methodological support and expert review of draft acts. These provisions give it a formal role in supporting strategic planning. While these provisions have contributed to improvements in planning quality through standardised requirements and structured methodological support, fragmentation of planning documents persists, and SCMU's mandate to act as the whole-of-government coordinator is not yet fully consolidated.
- **Reforms Delivery Office (RDO) within the SCMU**: An externally funded unit supporting the implementation of priority reforms and co-ordination with donors. The RDO acts as the Secretariat of the Ukraine Donor Platform and is valued for its ability to get the Prime Minister’s attention, though it is not a delivery unit in the classical sense as its functioning is a lot broader.
- **Ministry of Economy, Environment and Agriculture (MoECO)**: Responsible for economic, agricultural, and environmental policy, MoECO plays an important role in strategic planning within its areas of competence. In recent years, it has coordinated several significant planning processes, including contributing to the preparation of the National Economic Strategy until 2030 (adopted in 2021) and serving as National Coordinator for Ukraine's Plan under the Ukraine Facility. Both processes were conducted with the participation of civil society and multiple government stakeholders. MoECO's portfolio was further expanded to agriculture and environment in July 2025.
- **Ministry of Finance (MoF)**: Leads fiscal planning and manages public resources. MoF has a critical role in aligning strategic priorities with the state budget, but is often involved too late in planning processes, reducing its impact on feasibility assessments.
- **Ministry for Development of Communities and Territories (MDCT)**: Coordinates regional and territorial recovery, oversees state policy on infrastructure, and serves as the main liaison with local governments. It plays a lead role in vertical planning and the design of recovery frameworks. However, its role in strategic planning co-ordination with the centre of government, including the SCMU, remains insufficiently defined.
- **State Agency for Restoration and Infrastructure Development (SARDI):** A specialised agency under the Ministry for Development that implements large-scale infrastructure projects and supports local recovery based on regional and municipal needs.

As highlighted in the OECD’s compendium *Steering from the Centre of Government in Times of Complexity* (OECD, 2024[5]), effective strategic planning requires clear mandates, institutional leadership, and strong co-ordination capacity. In Ukraine, the absence of an empowered central planning authority has resulted in gaps, duplication, and diluted accountability. Strengthening the mandate of a single lead institution is

essential. The SCMU is well positioned for this role: it already manages the GP and GPAP, issues planning guidance, and has consolidated its leadership during wartime. Formalising its role as the steering institution would enhance coherence across central and local levels and streamline co-ordination with development partners. Other core institutions would retain important supporting functions. For example, the Ministry of Finance (MoF) typically reviews costings; the Ministry of Justice (or a dedicated entity in the CoG) ensures legal conformity; and the Ministry of Economy, Environment and Agriculture (MoECO) reviews alignment with economic and environmental priorities (OECD, 2017[6]). Clarifying these complementary roles would reinforce collective accountability while empowering SCMU to drive whole-of-government planning.

Another major challenge facing Ukraine is the lack of a system-wide quality assurance and control mechanism. In the absence of clear standards, ministries sometimes initiate new strategies that duplicate existing efforts or pursue goals that are not aligned with national objectives or available resources. The proliferation of strategic documents, some initiated under donor pressure or linked to project cycles, makes it difficult to steer and prioritise reform implementation. While there is no single regulation-based quality control process for strategies, the SCMU has established a practice of methodological support and review. Some draft strategies are reviewed during development, while others are assessed after submission to government, with recommendations provided and ministries sometimes asked to resubmit revised drafts. However, this approach is not yet consistently applied across all strategies and lacks a formal basis in regulation.

Moreover, public and stakeholder engagement in strategic planning remains limited. While the legal framework includes mechanisms for consultation, notably the 2010 resolution on public participation and the newly adopted Law on Public Consultations, these are not consistently applied in practice. Civic engagement in recovery planning, in particular, remains constrained by capacity gaps and competing priorities, and engagement mechanisms such as DREAM or public consultations around local recovery plans are still relatively nascent.

The above discussed challenges point not to a lack of effort, but to the need for a more consolidated and future-proof approach to strategic planning, one that can evolve from today's practices into a genuinely systemic architecture for recovery and reform. In August 2025, the Government approved the Concept of the National Strategic Planning System and the Action Plan for its implementation (CMU Order No. 853), which foresees comprehensive legislative reform through a new framework law. The law is expected to introduce institutional innovations, including clarification of the tasks and powers of the ministry or a potential "centre of government" body in coordinating strategic planning, and defining the roles of other participants in the system.

To strengthen Ukraine's planning framework, several steps are essential. First, the SCMU could be formally designated as the lead institution for strategic planning, with a clear mandate to coordinate horizontally across ministries. Its role in vertical co-ordination with regional and local levels should also be clarified in relation to the responsibilities of the Ministry for Development of Communities and Territories. Strengthening the SCMU's capacity in cross-government planning would also be needed to support this co-ordination mandate. Second, quality assurance and review processes should be institutionalised within the SCMU's planning oversight function, ensuring all strategic documents are coherent, feasible, and aligned with national priorities. This would also require strong political backing from the Prime Minister to prevent circumvention of the SCMU's co-ordination role through ad hoc or informal decision-making. Third, MoECO's role could focus on its core policy mandates (economy, agriculture, environment), while contributing to the system through economic and environmental expertise in its own strategic documents and in reviews of submissions to the Cabinet of Ministers. Finally, efforts to expand public engagement and transparency in planning processes must continue, especially in the context of Ukraine's broader democratic and EU accession goals. The following sections of this chapter examine each of these elements in greater detail, offering practical recommendations to strengthen co-ordination, clarify institutional roles, and improve the quality of strategic planning in Ukraine.

International experience also highlights the value of clear institutional mandates and phased, long-term planning in post-crisis contexts. Japan's response to the 2011 Great East Japan Earthquake provides useful lessons on how to structure recovery governance, coordinate across levels of government, and build a shared national vision (see Box 2.1).

Box 2.1. Recovery and reconstruction governance in Japan after the 2011 Great East Japan Earthquake

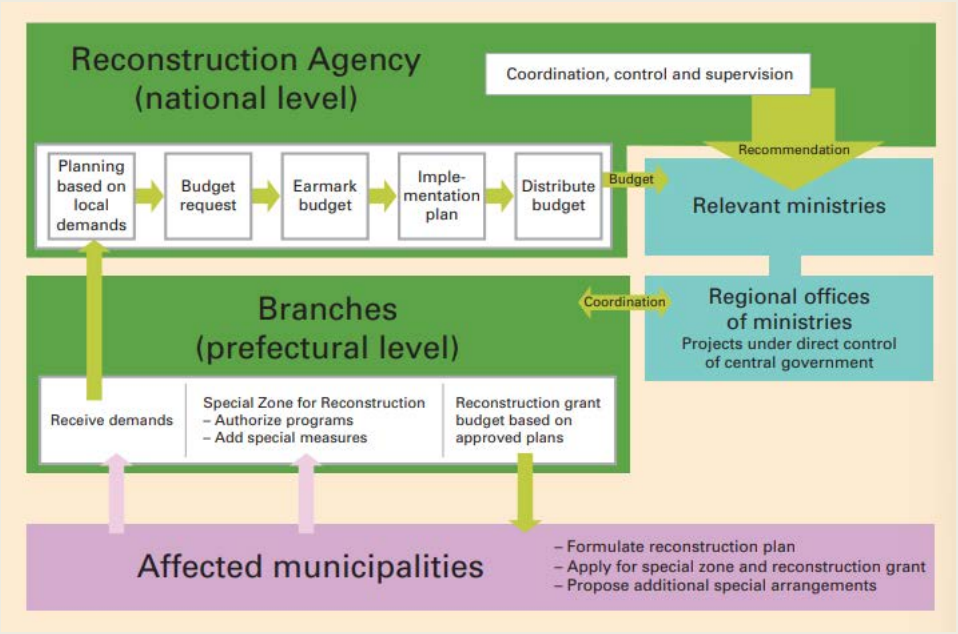
As a significant multilocation disaster in recent Japan's history, the Great East Japan Earthquake necessitated comprehensive multi-level reconstruction governance, serving as an exemplary model for governmental arrangements for an effective recovery and reconstruction.

Japan's reconstruction, lasting over 10 years, consisted of different stages with various government mechanisms in place. First, as an immediate response, the government established an emergency disaster control headquarters and an independent reconstruction design council (RDC). The RDC, consisting of highly respected intellectuals, academics, religious figures and elected officials, was tasked to adapt the existing recovery strategy. Within two months, the RDC proposed a consultative vision for the reconstruction that served as a basis for the government's Basic Guidelines and Basic Act for Reconstruction. The Basic Guidelines for Reconstruction set specific principles and policies for nationwide reconstruction, including putting people at the centre, making municipalities the main actors accountable for reconstruction while being supported by financial and technical support from central and regional levels. This highlights how Japan leveraged early national consultation for setting the nationwide recovery and reconstruction. Within this stage, the first supplementary budget for recovery was also adopted.

Second, based on the timely provided national guidelines, earthquake-afflicted prefectures and municipalities formulated their respective recovery plans. The development process included task force meetings with experts, residents and community representatives. Importantly, these plans initially were not intended to be comprehensive, their goal rather was to reach consensus among residents on the recovery vision. The regional and local level plans evolved as their entered consultations with ministries and elected officials. Recognising the strained capacity of municipalities due to population loss, the central government allocated two private sector consultants per municipality to deliver technical services in relation to damage assessment and engineering analysis. Furthermore, the national government provided supplementary budget resources to prefectures for reconstruction efforts.

The third and the longest stage consisted of establishing a reconstruction agency and special zones for reconstruction and providing flexible grants and policies to support municipalities. Similar as Ukraine, Japan created a national reconstruction agency for 10 years. The agency was headed by the prime minister and ensured co-ordination, control and supervision of nationwide reconstruction efforts (see Figure 1). The agency served as a "one-stop-shop" for local authorities and had three regional branches in the most-affected prefectures. The established special zones for reconstruction allowed the most affected municipalities to benefit from special arrangements, such as tax incentives, new systems for land use, deregulation policies and facilitated procedures for housing, industry and services.

Figure 2.1. The co-ordination framework of Japan's Reconstruction agency



Japan's experience offers several crucial lessons for government arrangements that could also be beneficial for Ukraine, notably:

- An early on, shared vision for recovery and reconstruction that recognises local characteristics and is perceived legitimate by key stakeholders and citizens can reduce the risk of a proliferation of strategies, external plans and
- The Reconstruction Agency as a standalone entity has enjoyed the highest political ownership in Japan, ensuring a cross-cutting government approach to recovery and reconstruction.
- Municipalities and prefectures remained accountable for their own reconstruction efforts while the national government provided them with guidance through general principles, technical support and policies such as the special zone for reconstruction.
- Citizens and experts were consulted throughout all reconstruction stages by different levels of governments, putting people at the centre of reconstruction.
- Throughout the recovery and reconstruction process, the needs and requirements by municipalities, regions and citizens were changing, implying the necessity for government arrangements and policies to be flexible and adjust accordingly.

Source: (International Recovery Platform, Kobe University and World Bank, n.d.[7])

Spotlight on recovery

Current fragmentation and challenges in recovery planning

Recovery governance in Ukraine is fragmented. The SCMU, MoECO, and MDCT all play roles in developing plans, but no single institution is formally designated to lead recovery planning and coordinate delivery.

In order to strengthen recovery planning Ukraine could:

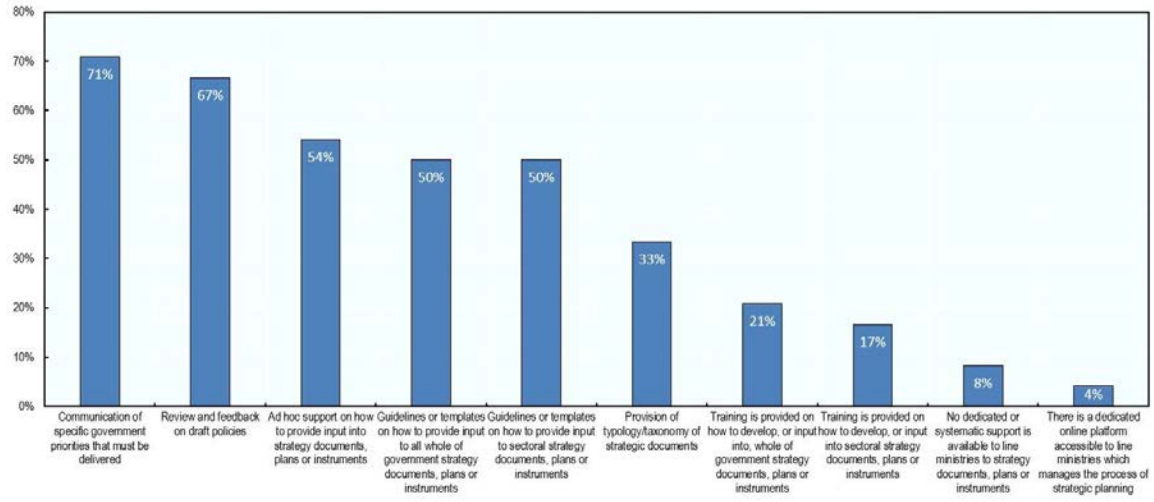
- Clarify institutional leadership by designating SCMU as the lead entity for recovery planning, with formal authority to coordinate inter-ministerial input and donor alignment.
- Define supporting roles for MoECO, MDCT, and the Recovery Agency focused on implementation and sector-specific recovery domains (e.g. infrastructure, regional development).
- Use existing instruments (e.g. Government Committees, RoP) rather than developing an expansive legal framework before the system is consolidated in practice

Strengthening co-ordination and accountability

Despite progress in establishing co-ordination mechanisms, Ukraine's strategic planning remains fragmented. The SIGMA Monitoring Report (OECD, 2024[2]) highlights that co-ordination in sector strategy development is still insufficient, while the OECD Policy Framework (OECD, 2020[4]) underscores the need for institutionalised, whole-of-government mechanisms. Without clear frameworks and prioritisation, ministries risk duplicating efforts rather than advancing implementation.

The SCMU's Directorate of Public Policy Co-ordination and Strategic Planning plays a central role in co-ordinating strategic planning. In line ministries, strategic planning units, referred to as expert groups, are designated as focal points for co-ordination with the SCMU. However, these units face serious capacity gaps, lacking staff, tools, and structured guidance. Many line ministries rely on informal networks due to the absence of clear procedures, and methodological support from SCMU remains limited. Lessons from OECD countries show that Centres of Government can address such gaps through guidance, feedback, and training (OECD, 2023[8]). Ukraine could draw on these practices to empower SCMU not only as a co-ordinator but as a centre of expertise and support for strategic planning across all levels of government. Key line Ministries can also play important roles of providing expertise in their own areas, such as regulations for the MoJ, costs for the Ministry of Finance, and economic policy for the MoECO.

Figure 2.2. Support provided by the CoG to line ministries and agencies in developing strategic plans in OECD countries, 2023



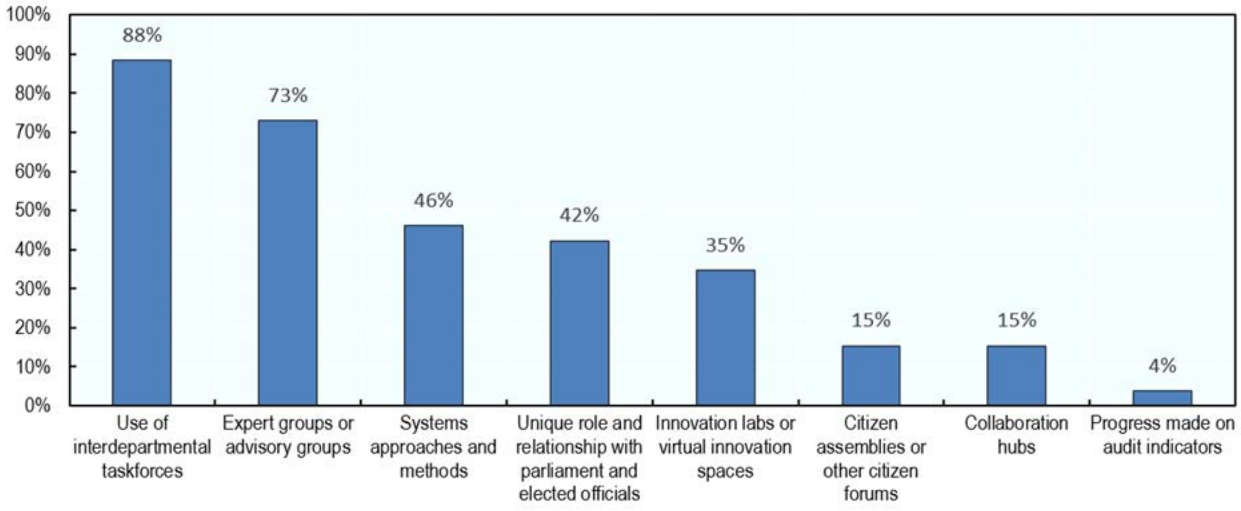
Note: n=24; Respondents to the survey were asked: "What support does CoG provide to line ministries and other agencies to develop strategy documents, plans and instruments?".
Source: (OECD, 2023[8])

While the SCMU and ministries rely on a range of co-ordination mechanisms, many remain informal or ad hoc such as messenger-based communication between state secretaries or occasional working groups. These informal tools have proven useful in times of crisis, yet they lack institutional sustainability and accountability. Strengthening formal interministerial co-ordination structures such as regular strategic planning councils, formal networks of ministerial focal points, and structured collaboration with the Ministry of Finance and the Ministry of Economy, Agriculture and Environment would enhance coherence and reduce policy fragmentation. This could build on the expert groups already present within SCMU and sectoral working groups, transforming them into more systematic instruments of whole-of-government co-ordination.

Consulted CoGs in OECD Member countries (OECD, 2023[9]) indicated that the most commonly used co-ordination tools are interdepartmental taskforces, expert groups, and advisory groups (see Figure 2.3). Effective co-ordination bodies often depend on strong leadership, the involvement of appropriate representatives, and a well-defined purpose. Inter-departmental co-ordination arrangements can serve different purposes and have different benefits, for instance:

- They provide a forum for high-level political monitoring and decision-making and co-ordination across different ministries.
- They can help to ensure that policies are aligned with/integrated into the government programme's strategic priorities and objectives.
- They can facilitate the development of cross-cutting policies that address complex, multidimensional issues that require input from multiple ministries.

Figure 2.3. Mechanisms used by CoGs to support co-ordination in OECD countries, 2023



Note: n=26. Respondents to the OECD survey were asked: "What enabling mechanisms does the CoG leverage to support co-ordination and coherence?".
Source: (OECD, 2023[9])

Many of the current co-ordination and hierarchy gaps in Ukraine's planning system stem from the absence of a clear procedural and legal foundation. Although the Rules of Procedure (Government of Ukraine, 2012[10])(Article 24) stipulate that ministries should align their strategies with the overarching Government Programme, there is no structured mechanism or enforcement process to ensure this alignment. As confirmed in SCMU's questionnaire responses, this leads to fragmented and inconsistent practices across ministries.

As a result, strategic planning documents are frequently developed in silos**.** Under the current CMU Rules of Procedure, ministries are not required to consult the SCMU in advance when preparing strategies, which limits opportunities for coherence and early co-ordination. Drafts may be submitted for Cabinet approval without meaningful engagement from other ministries or MoF, resulting in weak alignment between strategic priorities and budget allocations. Although the MoF formally reviews strategies before adoption, it is typically not involved early enough in the planning cycle to assess financial feasibility. Strengthening procedural tools and enabling earlier, structured engagement between SCMU, MoF, and line ministries is essential to support coherent, financially viable, whole-of-government planning (see also section 3.2 on linking planning with budgeting).

Ukraine has created inter-ministerial platforms such as the Strategic Investment Council and sectoral working groups, but these often lack the weight to drive implementation. Regular, structured co-ordination forums remain absent. OECD countries like Finland have established ministerial committees and thematic groups under CoG leadership to ensure policy coherence and strategic alignment (see Box 2.2).

Box 2.2. Focused high-level inter-ministerial committees in Finland

Finland has established several co-ordination mechanisms to support strategy and decision-making supported by the CoG, particularly the Government Strategic Department. They bring together different line ministries and are usually shared by one or two lead ministries, depending on the topic. Finland has created:

- Four permanent Ministerial Committees on Finance, Economic Policy, European Union (EU) Affairs and Foreign and Security Policy that play a key role in co ordinating government policies and revise key proposals before they are submitted to the weekly meetings of the Cabinet.
- Thematic working groups focusing on a few government priorities (e.g., the Ministerial Working Group on Developing the Digital Transformation, the Data Economy and Public Administration) that help steer, monitor and implement those priorities. Working groups will be adjusted, cancelled or renewed depending on the evolving government priorities.
- Functional working groups on research and foresight that inform and coordinate all government work on these functions.

Source: (OECD, 2024[5])

Despite the above discussed limitations, Ukraine's institutional landscape offers a foundation that could be built upon. The SCMU and line ministries have established working-level planning units, called expert groups, that can serve as a co-ordination backbone, provided their roles and responsibilities are better formalised. Regular co-ordination meetings led by SCMU, supported by clear terms of reference and guidance tools, could improve alignment and strategic coherence.

Importantly, SCMU's co-ordination role must also extend beyond the formulation of strategies to include performance management and accountability. Strategic planning in Ukraine is still too often an input-driven, document-heavy exercise. If the system is to shift toward results-based planning, the SCMU must be empowered to monitor the implementation of strategies, the GP and the GPAP in a systematic manner. This includes ensuring that line ministries define measurable policy objectives and track progress accordingly. The SIGMA monitoring report (OECD, 2024[2]) noted that less than half of Ukraine's central government strategies include a full set of indicators, and monitoring is rarely embedded at the planning stage, weakening the accountability role of SCMU in implementation oversight. Recent efforts to define participants and roles in the planning system, including through the Concept, will need to be extended and linked to practical mechanisms for whole-of-government monitoring and accountability. Strengthening accountability mechanisms would not only increase the credibility of planning efforts but also help prioritise scarce resources and adjust actions based on performance.

To this end, SCMU could institutionalise regular inter-ministerial co-ordination meetings to discuss the design and implementation of strategic priorities. Its expert groups must be further capacitated to support line ministries, particularly in linking strategic objectives to performance indicators and fiscal planning. Formalising the roles of expert groups in ministries and enhancing their engagement with SCMU can improve both vertical and horizontal coherence. These steps are essential to transform strategic planning into a tool for integrated policy delivery, especially as Ukraine navigates the complexities of post-war recovery and EU accession.

Spotlight on recovery

Ukraine's recovery planning remains fragmented, with overlapping mandates and informal co-ordination mechanisms. Multiple actors contribute, SCMU, MoECO, MDCT, MoF, but no single institution is formally empowered to lead. Recovery strategies are often disconnected from donor pipelines, and regional and monitoring feedback loops are weakly integrated.

In order to strengthen co-ordination and accountability for recovery planning, Ukraine could:

- Mandate SCMU to formally lead recovery co-ordination, both across domestic institutions and in interface with international partners and donors, supported by strengthened institutional capacity.
- Establish a dedicated inter-ministerial recovery task force, chaired by SCMU, and involving notably the MoECO, the MDCT and the MoF to align planning, implementation, and resource mobilisation efforts.
- Create formal feedback loops between recovery implementation and planning, ensuring that insights from the DREAM system and other monitoring tools are used to adjust strategies and flag delivery risks.
- Institutionalise public-facing reporting mechanisms on recovery progress, drawing on models like France's DITP, to promote transparency and citizen accountability.

Defining a hierarchy of planning documents

A clear and operational hierarchy of planning documents is essential to align long-term vision, medium-term priorities, and short-term actions. The OECD's work on Centre of Government and strategic planning (OECD, 2024[5]) and the OECD SIGMA Principles of Public Administration (OECD, 2023[3]), highlight the need to cascade objectives across levels and timeframes and to ensure mutual reinforcement between national, sectoral, and regional strategies. While a planning law could help formalise such a hierarchy, several OECD countries have taken a more flexible approach using decrees and regulations. In Ukraine, the Ministry of Economy, Environment and Agriculture has drafted such a law, which could provide a formal anchor for the planning system if internal consensus is reached. Romania's experience illustrates how executive regulations can bring coherence and hierarchy without requiring legislation (see Box 2.3).

Box 2.3. Bringing hierarchy and coherence in Romania through executive regulations

In recent efforts to refine its strategic planning framework, Romania has implemented Government Decisions (GD) 379/2022 and 427/2022 to bring clarity and structure to its governmental strategies. At the core of these enhancements is the establishment of a well-defined hierarchy within the strategic planning landscape, as outlined in GD 427/2022. This effectively lays out the hierarchy of Romanian government strategies, differentiating between sectoral (focusing on specific domains) and intersectoral (addressing cross-cutting issues) approaches. This ensures all strategies align with national priorities outlined in overarching documents like the Government Program, promoting coherence and avoiding duplication of efforts.

Both decisions underscore the importance of aligning various strategies to achieve overarching goals. GD 427/2022 assigns to the General Secretariat of the Government (GSG) the crucial role of verifying proposed strategies against national priorities. GD 379/2022 further reinforces this by advocating for complementarity and integrated approaches across strategies. This emphasis on alignment helps ensure efficient resource allocation in order to maximise the impact of its strategic planning efforts.

Specifically, GD 379/2022 also underscores the integration of the United Nations 2030 Agenda for Sustainable Development into the Romanian strategic planning framework. This ensures that Romania's strategic initiatives not only serve national interests but also align with global sustainability goals, illustrating a forward-thinking and holistic approach to strategic planning.

Source: (OECD, 2023[11])

One of the key challenges facing Ukraine's current strategic planning efforts is the absence of a well-defined and consistently applied hierarchy of planning documents. Currently, different plans such as the GPAP, sectoral strategies, regional development strategies, and recovery planning efforts operate in parallel with limited co-ordination, leading to overlaps, inconsistencies, and missed opportunities for synergy. In particular, while the GPAP preparation process includes requirements for ministries to incorporate commitments from the Reform Matrix and EU integration documents, stakeholders consulted in the framework of this Review noted that systematic cross-referencing and harmonised monitoring across the GPAP, the Reform Matrix, and the National Action Plan for the Implementation of the Association Agreement (NAPIAA) remains limited in practice, illustrating the systemic gaps that still exist.

Ukraine has taken significant steps to strengthen EU integration planning through the establishment of a new co-ordination architecture for accession, including the Interagency Working Group and 36 dedicated negotiation groups created under Cabinet Resolution No. 987 (August 2024), and the development of a new National Programme for the Adaptation of Ukrainian Legislation (NPAA) which was approved on April 1st 2026, and led by the Deputy-Prime-Minister for European and Euro-Atlantic Integration and the Government Office on Coordination of European and Euro-Atlantic Integration. Monitoring is supported through the "Accession Pulse" digital system managed by GOCEEI. While these developments mark important progress, stakeholders consulted in the framework of this Review noted that the GPAP, NAPIAA, and Reform Matrix still operate in parallel, without systematic cross-referencing or harmonised monitoring frameworks. This results in overlapping timelines and fragmented priorities. While responses to the OECD questionnaire indicate that a number of ministries tend to approach the GPAP primarily as an annual reporting obligation, the SCMU considers it the government's core short-term planning instrument, designed to translate policy priorities into operational tasks for the year ahead. Bridging this gap in perception will be important for the GPAP's long-term value in supporting policy coherence, particularly as EU integration becomes an overarching priority. Its role in the planning system could be strengthened

further by better linking it to longer-term strategic objectives and by clarifying its place in a formal planning hierarchy.

This fragmentation is especially problematic in a context where priorities are urgent, and resources are limited. The war has further complicated efforts to develop a coherent planning framework. For example, the National Economic Strategy 2030, approved in 2021, contains elements that may no longer fully reflect Ukraine's current context. Consulted stakeholders provided diverging views on its status: while some noted that a review process is under way, others were unaware of any formal revision. At the same time, new strategies often emerge in response to donor requirements or sector-specific crises. As a result, the planning system risks becoming reactive rather than steering policy in a proactive and integrated manner.

Consulted stakeholders noted the importance of agreeing on the hierarchy of planning documents as a prerequisite for improving alignment and delivery. Whether this is done through a dedicated law or formal guidance, the key is achieving a shared understanding across institutions of how long-, medium-, and short-term planning instruments relate to each other, and which document should sit at the top of the hierarchy.

Although the recent SIGMA assessment of Ukraine (OECD, 2024[2]) recognises improvements since 2018, including the introduction of formal requirements for sector strategies and multi-year programming, strategic documents are still often developed without clear vertical integration or performance frameworks. There is no unifying strategic vision that links national priorities to local plans in a way that guides both top-down steering and bottom-up responsiveness. While regional and community strategies are increasingly aligned with the State Strategy for Regional Development, their consistency with national-level plans such as the GPAP and other horizontal priorities remains weak.

A clearer hierarchy of strategic documents is needed, not only to clarify roles and priorities, but to enable effective recovery and strategic co-ordination across government. The Government Programme should serve as the core medium-term policy document, reflecting the Government's political priorities over its mandate. The GPAP, in turn, is an annual implementation plan, translating selected priorities of the Government Programme into short-term actions. A long-term document providing a vision for Ukraine could also be developed in the future as the main driver and reference for all reforms, for instance a Ukraine 2050 vision that could gather all forces and priorities around long-term objectives. These should be further operationalised through sectoral and regional strategies, which must be explicitly required to cascade from the national level and refer to both the GPAP and broader policy frameworks such as the budget and EU accession commitments. Current practices, where sector strategies are developed in isolation and approved without strong co-ordination or fiscal scrutiny, must be revised. The 2024 SIGMA assessment (OECD, 2024[2]) confirms that Ukraine's Rules of Procedure do not require sectoral strategies to explicitly align with the GPAP or with multi-year fiscal frameworks, further compounding fragmentation risks.

A top-level strategic planning framework building on the Government Programme and aligned with recovery and EU integration goals could serve as the anchor document, with the GPAP functioning as its annual operational arm. This framework should be coordinated by the SCMU and structured through government resolutions and clear operational procedures, in co-ordination with other key institutions such as the Ministry of Economy, Environment and Agriculture and the Ministry of Finance, rather than through a revival of older planning models such as the National Economic Strategy, which lacked integration and whole-of-government ownership. Equally, its role must be recognised not only as a co-ordination tool but also as an accountability instrument, with a robust performance management system to track progress across different government levels. Latvia's approach to strategic planning offers useful lessons for Ukraine in building a unified medium-term framework that balances national priorities, budgeting constraints and stakeholder involvement.

Box 2.4. Long-term strategic planning led by the Centre of Government in Latvia

In 2020, the Latvian government and parliament approved the National Development Plan 2021-2027. The plan defines the strategic goals, priorities, measures and indicative investment needs for seven years to achieve sustainable and balanced development. The NDP2027 sets 4 strategic goals for 2027 in 6 priority areas and 18 directions for key policies.

The creation of the NDP2027 was centrally led by the Cross-Sectoral Co-ordination Centre (PKC), a CoG entity now integrated into the State Chancellery, with a mandate to develop a long-term strategic approach to public policy making. The unique position of the PKC made it possible to develop the NDP coherently and collaboratively in accordance with the Latvian Sustainable Development Strategy 2030 and the United Nations Sustainable Development Goals (SDGs).

In addition, the NDP incorporates engagement with citizens, experts and other stakeholders. Over 150 different stakeholders work in six working groups organised by the PKC under the prime minister's authority. These activities helped the CoG gather insights from different groups, providing valuable input for the plans while building advocacy.

The plan outlines the long-term vision and how it translates into operational plans, including information on indicators, responsible authorities and funding.

Finally, the NDP2027 was created in line with the resources available in the country. Policy changes are supported by public investment from the national budget, European Union (EU) funds and other financial instruments. In this context, abrupt crises might change financial possibilities, as was the case with the COVID-19 pandemic and the EU Recovery and Resilience Facility response to it.

Source: (Government of Latvia, accessed on 2/04/204[12])

EU integration is becoming a key driver of Ukraine's strategic planning architecture. The Ministry of Justice leads the preparation of the NPAA, supported by GOCEEI through the "Accession Pulse" system, while a national delegation and 36 thematic groups steer negotiations on the acquis. However, integration of EU planning into broader budgetary and strategic cycles remains limited. Closer co-ordination between the NPAA, GPAP, and national frameworks will be essential to leverage EU instruments like the Ukraine Facility and ensure coherence with domestic priorities. This will require close collaboration between SCMU, the Government Office on Coordination of European and Euro-Atlantic Integration, the Ministry of Justice, GOCEEI, and the Ministry of Finance.

Spotlight on recovery

Despite recent progress such as the launch of the NPAA and the development of Ukraine Facility pipelines, Ukraine still lacks a unified framework that links immediate recovery needs with medium-term reconstruction and long-term development goals. Recovery efforts are spread across disconnected instruments: the GPAP, sectoral strategies, regional plans, and donor-driven programmes often operate without a shared sequencing logic or institutional architecture.

The GPAP includes a recovery pillar, but its annual scope limits its function as a strategic anchor. It is not systematically linked to regional plans or EU-aligned investment pipelines. Ministries and regions act with limited guidance on how their efforts fit into a broader recovery strategy, weakening prioritisation and budget alignment.

In order to strengthen coherence in recovery planning Ukraine could:

- Develop a unified strategic recovery framework that clarifies the hierarchy of documents, from a long-term national vision to sectoral and regional action plans, and explains how these relate to the NPAA and Ukraine Facility.
- Use the DREAM platform to monitor the flow and integration of recovery plans from local to national levels.
- Ensure downstream reforms reinforce this hierarchy, including the consolidation of documents (see Addressing the proliferation of planning documents and their quality), improved vertical co-ordination (see Strengthen vertical co-ordination), and alignment with budgeting tools (see Linking planning to budgeting).

Addressing the proliferation of planning documents and their quality

Like many countries, Ukraine faces a proliferation of fragmented or overlapping strategic documents. Ministries often prepare strategies in silos, with limited co-ordination with the SCMU or other sectors. While some documents are well designed, others are narrow or donor-driven, lacking coherence with national priorities. Ukraine does not yet have a comprehensive, publicly accessible strategy registry. Although the SCMU tracks some adopted strategies internally and provides methodological support during drafting, this process is not fully formalised, applied consistently, and not used as a governance tool to streamline or reconcile documents. Lithuania's experience illustrates how consolidating and registering strategic documents can help rationalise planning (see Box 2.5).

As a result, weak and redundant strategies persist in the system, and even well-conceived plans can be diluted by conflicting or uncoordinated priorities. This creates inefficiencies not only in planning but also in budgeting, monitoring, and donor engagement. In some cases, strategies are developed primarily to meet international partner expectations, particularly in sectors receiving large volumes of technical assistance. These risks reinforcing the logic of form over function, where "having a strategy" is prioritised over "having the right strategy."

To address this issue, Ukraine should establish a quality assurance function within the SCMU, with involvement from other key institutions. This function would assess draft strategies before Cabinet submission for their consistency, feasibility, and policy coherence. While the SCMU already reviews some drafts, this practice is not yet standardised or legally mandated. Formalising the process through a Cabinet resolution or amendment to the Rules of Procedure would align with SIGMA's findings (OECD, 2024[2]), which noted that only a minority of draft strategies submitted to government are accompanied by feasibility assessments or reviewed against a formal checklist by SCMU.

Box 2.5. Rationalising strategic documents in Lithuania

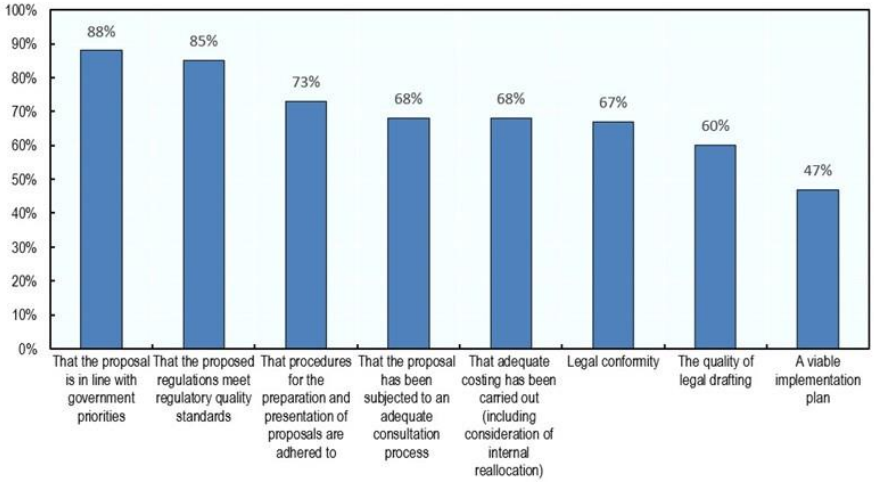
In 2015, Lithuania had over 250 strategic documents and nearly 1,800 monitoring indicators, leading to duplication and weak policy focus. In response, the government adopted a new Law on Strategic Management in 2020, establishing a results-oriented planning system with a clear legal framework. This law defined the hierarchy and types of planning documents, their link with the budget process, and clarified institutional responsibilities. A new methodology supported its implementation, guiding how sectoral and regional plans align with overarching goals.

As a result, Lithuania developed a registry of strategic documents and reduced the number of strategic documents to around 30, integrating them into a cohesive structure from long-term vision (e.g. Lithuania 2050) to sectoral and regional development plans. This approach enabled more coherent planning, performance-based budgeting, and simplified co-ordination across government.

Source: (OECD, 2024[13])

In various OECD member countries, the Centre of Government also assumes a review function for documents submitted to the Cabinet. This includes verifying whether proposals align with government priorities, follow required procedures, and meet financial, legal, and consultation standards. According to the 2023 OECD CoG Survey, 66% of OECD governments identified this quality control function as a top or significant priority. In some countries, this function is shared with specialised bodies, such as Ministries of Finance or Justice, but the CoG retains overall responsibility for ensuring coherence and procedural rigour (OECD, 2023[8]). In Ukraine, the CMU Rules of Procedure already assign the SCMU a review function: it examines draft acts for compliance with the Government Programme, checks adherence to procedural requirements (including public consultation), verifies legal conformity, and prepares an expert opinion. This provides a basic foundation for quality assurance. However, current practice shows that reviews are not always systematic or sufficiently robust to ensure that strategies and policies are coherent, feasible, and aligned with national priorities. Formalising and strengthening this review role for SCMU could help improve the consistency and alignment of strategic documents submitted to the Cabinet of Ministers. While the SCMU would oversee this review process, other key players need to be involved in Ukraine to revise strategic and policy proposals from their perspectives. The MoF should review the costing associated with the proposal, as is also the case in OECD Member countries, the MoJ revise the legal conformity and impacts of the proposal, and the MoECO its economic soundness and alignment with economic objectives. Czechia has for instance defined clear rules of procedures that are implemented through an online platform called eKLEP to support robust review processes of proposals from multiple perspectives submitted to the Council of Ministers (OECD, 2023[14]).

Figure 2.4. Revision of policy proposals, legislation and other policy documents in OECD countries, 2023



Note: n=24; Respondents to the survey were asked: "When reviewing draft policy proposals, legislation, or other policy documents, which aspects does the CoG ensure?"
Source: (OECD, 2023[8])

In addition, SCMU could launch a full strategy audit and create a public strategy registry, building on digital tools such as the DREAM system. The Concept of the National Strategic Planning System (CMU Order No. 853 of 13 August 2025) foresees the audit of all existing strategic documents as part of the implementation of a new framework law, as well as the creation of an IT platform with expanded functionality. This platform is intended to include features such as a registry of strategies and integrated monitoring tools. Such a registry should include meta-data on each strategy's status, coverage, action plan, financial linkage, and alignment with GPAP and recovery goals. If implemented effectively, this would not only serve as a transparency tool but also provide a basis for regular reviews and a strategic reconciliation process. Through this mechanism, overlapping, outdated, or narrowly defined strategies could be merged, retired, or updated to serve broader policy goals. Czechia has implemented such a registry of strategies at all levels through an online platform accessible to all (OECD, 2023[14]).

To prevent future fragmentation, the strategy development process should be restructured to ensure broader consultation and strategic coherence from the outset. Ministries should be required to conduct early-stage co-ordination with the SCMU, MoF, and other relevant ministries before drafting a strategy. The purpose of this step would be to clarify the strategic relevance of the proposed initiative, assess its alignment with higher-level national objectives, and ensure that financial, economic, and cross-sectoral implications are taken into account from the beginning. In practice, this would mean that SCMU could provide guidance on coherence with government priorities and existing strategies, the MoF could advise on fiscal feasibility, and other ministries could flag overlaps or interdependencies. This process could be guided by revised methodological guidelines and facilitated through newly formalised expert groups or strategy focal points. Moreover, public consultation should be embedded early in the process in line with the new Law on Public Consultations, not just as a final step.

As highlighted by consulted stakeholders in the framework of this review, sustained efforts are also needed to build capacity for better planning. Many ministry staff lack experience in designing strategies based on evidence, scenarios, and measurable objectives. SCMU's ongoing work to develop updated methodological guidance is promising, but should be accompanied by training programmes, peer exchange opportunities, and access to technical assistance. These efforts should also include the dissemination of clear templates, checklists, and written guidance to standardise good practice across

government. For strategies with a strong local component, institutional co-ordination with the Ministry for Development of Communities and Territories (MDCT) should also be strengthened and clearly delineated. Over time, this should reduce reliance on donor-driven strategy preparation and empower national actors to develop policy documents that are both meaningful and implementable.

Finally, the significant human resource constraints facing Ukraine's public administration exacerbated by the war, European integration demands, staff burnout, and demographic pressures, mean that strategic planning reforms must be pragmatic and targeted. Overly complex planning systems risk overwhelming limited institutional capacities and reducing implementation effectiveness. Simplification of planning documents, clearer prioritisation, and the reduction of duplicative processes are essential not only for coherence but also for sustaining the capacity of government institutions and staff.

Reducing the number of strategies while improving their quality is also not a question of centralisation versus decentralisation, but of coherence, efficiency, and impact. Ukraine's recovery and long-term development depend not on having more strategies, but on having better ones. Fewer, clearer, and better aligned with the nation's overarching goals and fiscal constraints.

Spotlight on recovery

Ukraine's recovery planning continues to suffer from fragmentation. Many recovery strategies are developed in response to donor timelines or funding opportunities but lack alignment with national priorities or sectoral frameworks. Strategies are often narrowly scoped and uncoordinated, undermining coherence and limiting impact.

A further challenge is the absence of a formal quality control process. Draft strategies are not consistently reviewed for feasibility, costing, or strategic alignment. Without action plans, performance criteria, or links to national frameworks like the GPAP, many recovery documents remain disconnected from implementation and budgeting.

In order to strengthen recovery planning Ukraine could:

- Create a unified recovery strategy registry (building on the DREAM platform) to catalogue and assess the status, relevance, and alignment of all existing recovery plans.
- Mandate pre-screening of all draft recovery strategies by the SCMU for coherence with the GPAP, sectoral objectives, and national recovery priorities before approval.
- Launch a strategy reconciliation process to consolidate, merge, or retire outdated or duplicative recovery strategies—ensuring that the focus remains on scalable, high-impact initiatives.
- Develop clear templates to guide ministries and regional actors in drafting recovery strategies, including required sections on objectives, actions, costs, and links to other plans.

Enhancing public participation and transparency in strategic planning

Well-planned and transparent strategic planning is a core principle of resilient, democratic governance, as outlined in the OECD Recommendation of the Council on Open Government (OECD/LEGAL/0438) (OECD, 2017[15]), and the OECD Declaration on Building Trust and Reinforcing Democracy (OECD/LEGAL/0484) (OECD, 2022[16]). These principles are particularly relevant for Ukraine's recovery and EU accession, where public confidence and legitimacy are essential. While legal provisions for public consultation exist, such as Resolution No. 996 (2010) and the new Law on Public Consultations, actual implementation remains limited, particularly given the ongoing war and competing priorities. In this context, broad-based public consultations are challenging to organise. Nevertheless, gradually strengthening

structured engagement, especially in recovery and reconstruction planning, remains important to ensure legitimacy, local ownership, and trust.

Many strategies are developed with minimal structured engagement of civil society, businesses, or citizens, especially at local level, where awareness and capacity are limited. Consultations, where they occur, tend to happen late in the process and offer limited opportunity to shape priorities. Consulted stakeholders in the framework of this review noted that feedback is rarely analysed or reflected in final documents, and feedback loops are generally absent.

In the recovery context, this lack of engagement is particularly problematic. Reconstruction planning requires not only technical expertise and central co-ordination, but also local knowledge, legitimacy, and buy-in. Citizens, municipalities, and businesses are key actors in implementing recovery measures, and in many cases they will bear the social and financial costs of reconstruction. Their early involvement is thus critical to ensure the relevance, feasibility, and sustainability of recovery strategies.

Recent initiatives, such as the DREAM digital platform, offer promising avenues to increase transparency. The platform allows users to track recovery projects, access planning documents, and, in the future, could offer functionalities for citizen feedback and participatory monitoring. However, such tools must be accompanied by stronger procedures for structured dialogue.

To address these challenges, Ukraine should institutionalise public consultation as a formal requirement throughout the strategic planning process, not just at the final stages. This should apply at both national and local levels and be supported by clear timelines, accessible materials, and user-friendly platforms for engagement. The new Law on Public Consultations offers a legal basis to strengthen these practices and should be fully implemented in co-ordination with the broader planning reforms.

Moreover, the capacity of local authorities, CSOs, and representative associations needs to be strengthened. This includes training on how to design and moderate participatory processes, how to incorporate feedback into strategy development, and how to manage expectations in a complex, resource-constrained environment. The Ministry for Development, Territories and Infrastructure Development, in co-operation with donor programmes such as U-LEAD and GIZ, already supports some municipalities in this regard. These efforts should be expanded, with a particular focus on communities most affected by the war.

Finally, the role of businesses in strategic planning for recovery merits attention. The private sector will be instrumental in financing, implementing, and sustaining recovery efforts, particularly in infrastructure, housing, and energy. As noted in the OECD Economic Survey of Ukraine (OECD, 2025[1]), engaging businesses early in the planning process increases the likelihood that projects will be viable, bankable, and aligned with market realities. Mechanisms such as public-private advisory councils or regional recovery forums could be formalised to ensure that the voice of the business community is reflected in national and regional plans.

To attract private investment and ensure viable recovery projects, ministries should engage business representatives, especially SMEs, early in the planning cycle. This is particularly critical in sectors like infrastructure, energy, digital services, and the green transition. Government platforms like DREAM can support this engagement by providing real-time data and facilitating transparent consultations but must evolve beyond data repositories into interactive planning tools.

Enhancing public participation is not merely a procedural obligation but a substantive requirement for effective planning that works for all. As elaborated in the dedicated chapter 4 of this Review on “Citizen participation for a more resilient democracy for more effective policies in Ukraine”, participation must become a core feature of Ukraine’s recovery planning. That chapter outlines a vision for participatory governance that includes, among other proposals, the organisation of a Conference for Reconstruction bringing together citizens, civil society, experts, and government actors to jointly deliberate on Ukraine’s reconstruction priorities. Embedding these kinds of mechanisms in the strategic planning cycle will be key

to building resilience, legitimacy, and public trust, foundations that are essential for both recovery and Ukraine's EU accession process.

Spotlight on recovery

Recovery planning will only be effective and legitimate if it reflects the needs of citizens, civil society, and businesses. Yet stakeholder engagement in Ukraine's recovery remains largely ad hoc or donor driven. Public consultations are not standardised, and recovery strategies rarely incorporate systematic input from affected communities or economic actors.

While the Law on Public Consultations and the DREAM platform offer new tools, their use in recovery planning remains limited. Businesses, despite their central role in financing and implementing reconstruction, are often engaged too late. The war understandably constrains participation, but recovery planning offers an opportunity to embed long-term practices of co-design and transparency.

To make recovery planning more participatory and accountable, Ukraine could:

- Operationalise the new Law on Public Consultations by issuing clear implementation guidance for recovery-related consultations at both central and local levels.
- Embed citizen feedback loops into DREAM's modules, enabling real-time commenting and oversight of recovery projects.
- Create advisory platforms for business and civil society, co-chaired by SCMU or MDCT, to consult on priorities in areas such as infrastructure, housing, and local services.
- Support local governments in building consultation capacity, including through model templates, digital tools, and targeted capacity-building initiatives.
- Increase transparency by publishing recovery plans, performance reports, and financial data in accessible and user-friendly formats.

Strengthen vertical co-ordination

Ukraine's decentralisation reforms since 2014 laid important groundwork for regional development, but vertical co-ordination challenges persist. The OECD's Review *Rebuilding Ukraine by Reinforcing Regional and Municipal Governance* (OECD, 2022[17]) noted that dormant co-ordination bodies, overlapping mandates, and limited municipal capacity continue to hinder strategic alignment. These issues have been amplified by the war, which has tested the resilience of frontline and host regions and blurred governance roles, particularly through the rise of military administrations and the dual accountability of regional governors to the President rather than the Cabinet of Ministers. "Host regions" refers to those areas, particularly in central and western Ukraine, that have received significant numbers of internally displaced persons (IDPs) fleeing conflict zones, placing substantial pressure on local infrastructure, services, and governance systems. Furthermore, local governments often lack strategic guidance and tools, complicating alignment with national planning.

Although regional strategies are legally required to align with the State Strategy for Regional Development (2021–2027), this is not consistently enforced. Mechanisms such as the review procedure under CMU Resolution No. 816 (2023) exist, but co-ordination with the MDCT and SCMU remains ad hoc. Recovery planning is further complicated by population displacement, infrastructure damage, and diverging regional priorities. A one-size-fits-all approach is no longer viable; subsidiarity and central support must go hand in hand.

To improve co-ordination, Ukraine could build on decentralisation reforms and digital tools by developing a national framework for regional recovery and development planning. Based on the Law "On the Principles

of State Regional Policy" and the recommendations of the OECD's Review: Rebuilding Ukraine by Reinforcing Regional and Municipal Governance (OECD, 2022[17]), such a framework could define minimum standards for regional strategies, clarify roles, and establish review procedures. Reactivating key bodies like the Inter-Departmental Co-ordination Commission for Regional Development would also help ensure regular dialogue and reduce fragmentation.

The DREAM system offers strong potential as a co-ordination and transparency tool. With over 5 800 local recovery projects already included, it could evolve into a full-fledged instrument to align local and national priorities, track project implementation, and support needs-based investment decisions. Consulted regional authorities in the framework of this Review noted that while DREAM is a promising tool for vertical alignment, its use remains uneven across oblasts and *hromadas*, and local governments often lack the training to use it for effective planning.

Building on these efforts**,** cascading national objectives into local planning processes is particularly critical for reconstruction and regional recovery. The Ministry for Development of Communities and Territories and the Ministry of Economy, Environment and Agriculture, together with SCMU, have begun working on guidelines and data systems to support regional and municipal governments in aligning their strategies with national objectives (including through DREAM and SDG frameworks). These efforts need to be expanded and anchored within the strategic planning system itself, ensuring that local plans are not just compliant with national goals, but also allow for local priority setting and responsiveness.

To support this, SCMU could pilot a multi-level governance model (see Box 2.6) that explicitly integrates GPAP objectives into regional and local action plans. This model should define not only the hierarchy of documents but also the mechanisms for translating national priorities into actionable regional strategies. Such a model would allow for better alignment between recovery projects, regional investment pipelines, and central-level priorities. Moreover, it would help clarify roles between SCMU, the Ministry for Development of Communities and Territories (MDCT), and regional actors, who are currently operating without clearly defined responsibilities for planning coherence. The leadership of such a model, and of the accompanying co-ordination mechanisms, could be shared with the MDCT given its role at regional and local levels.

Box 2.6. Supporting vertical co-ordination on planning and development in Poland

To support vertical co-ordination on strategic planning and development, Poland established the Co-ordinating Committee for Development Policy as a permanent inter-ministerial committee with sub-committees linked to regional development issues (e.g., Sub-committee for Rural Areas Development, Sub-committee for Territorial Dimension). The committee carries out analysis and drafts documents to facilitate the implementation of the country's Strategy for Responsible Development, which has a strong territorial dimension.

Besides strategic co-ordination, several mechanisms support vertical co-ordination, including support to capacity building, funding instruments and contractualization. Poland has developed "territorial contracts" between line Ministries and local governments, that aim to support the co-ordination of activities undertaken by the national and local government targeted at achieving common objectives and help redistribute state budget and fund activities to realise national objectives and co-fund investments.

Source: (OECD, 2021[18])

Attention should be paid to building a balance between central steering and local flexibility. Planning documents must leave space for bottom-up articulation of needs and adaptation to local circumstances,

especially in regions affected differently by war. Ensuring alignment across levels while preserving the autonomy and creativity of regional actors will be key to the success of Ukraine's long-term recovery and EU integration process.

Stronger intermediaries are also needed. Oblast administrations could play a more proactive role in aggregating local needs, cascading central guidance, and co-ordinating regional plans, while *hromadas* (local level entity similar to a municipality) would remain responsible for implementation. This approach would help Ukraine balance bottom-up recovery priorities with top-down strategic alignment, ensuring both responsiveness and coherence.

Spotlight on recovery

Effective recovery requires coordinated action across all levels of government. Yet municipalities, the frontline for reconstruction and service delivery, are often excluded from upstream planning and lack capacity to engage. Oblast administrations could serve as critical intermediaries but lack a formal mandate and tools to align local recovery plans with national strategies.

Many local recovery plans are developed in isolation, using inconsistent formats and with limited technical capacity. As a result, they are weakly connected to national priorities, fiscal frameworks, or donor pipelines, risking duplication, inefficiencies, and missed investment opportunities.

To enhance whole-of-government recovery co-ordination, Ukraine could:

- Formally designate oblast administrations as co-ordination hubs, responsible for aggregating, quality-checking, and transmitting municipal recovery plans to central authorities.
- Standardise formats for local recovery planning to ensure alignment with national strategies and fiscal frameworks (e.g. public investment priorities, GPAP).
- Leverage the DREAM system as a vertical co-ordination tool, ensuring that data from local and regional levels feeds into national dashboards and progress monitoring.
- Provide tailored technical assistance to local governments, in partnership with U-LEAD, GIZ, SURGe and others, to strengthen planning, costing, and monitoring capacities.
- Encourage co-financing and cross-level collaboration, particularly for infrastructure, energy, housing, and social services.
- Revive and strengthen the Government Committee on Recovery of Ukraine as a formal intergovernmental co-ordination platform, with clear procedures for associating the Secretariat of the Cabinet of Ministers (SCMU), Ministry for Development of Communities and Territories (MDCT) and key regional stakeholders.
- Revive and strengthen the Inter-Departmental Co-ordination Commission for Regional Development as a formal intergovernmental co-ordination platform, with clear procedures for associating the Secretariat of the Cabinet of Ministers (SCMU), the Ministry for Development of Communities and Territories and key regional stakeholders. Strengthening the role of this Commission could help ensure coherence across levels of government and support the implementation of the national recovery plan and State Regional Policy.

2.3. Ensuring the delivery of priorities through improved performance management.

Performance monitoring

Strengthening performance monitoring is essential for Ukraine to ensure that strategic priorities translate into measurable results. OECD countries have increasingly recognised the importance of institutionalising performance frameworks that generate evidence on what works and support accountability. The OECD Recommendation on Policy Evaluation (OECD/LEGAL/0478) (OECD, 2022[19]) further encourages governments to embed evaluation mechanisms across the policy cycle and to promote systematic use of evidence in decision-making. Its accompanying Implementation Toolkit (OECD, 2024[20]) offers practical guidance for developing fit-for-purpose evaluation systems and improving strategic steering. These principles provide a useful reference point for Ukraine's ongoing reforms, especially as it seeks to align national priorities with recovery needs and international standards.

As further indicated in the OECD's Policy Framework on Sound Public Governance (OECD, 2020[4]), evidence is crucial for effective strategic planning. Performance information, particularly when collected systematically and used in structured performance dialogues, helps governments measure progress against policy targets and outcomes. It reveals whether actions are delivering intended results and enables mid-course corrections if implementation is off-track. Establishing effective feedback loops that integrate this evidence into decision-making is essential for adapting strategy and ensuring results. In the 2023 OECD CoG Survey, monitoring whole-of-government performance was identified as a clear priority by most Centres of Government.

Latvia's approach (see Box 2.7) demonstrates how a centre of government body can play a proactive role in monitoring national development policies across planning cycles, offering a useful model for Ukraine as it seeks to strengthen continuity, oversight and results orientation in its recovery and strategic planning processes.

Box 2.7. Monitoring national development policies from the centre in Latvia

Latvia aimed to create a flexible and measurable monitoring framework to connect policy planning with the country's longer-term vision. The objective of the system is to monitor and maintain sector-specific priorities and budget alignment with national development priorities.

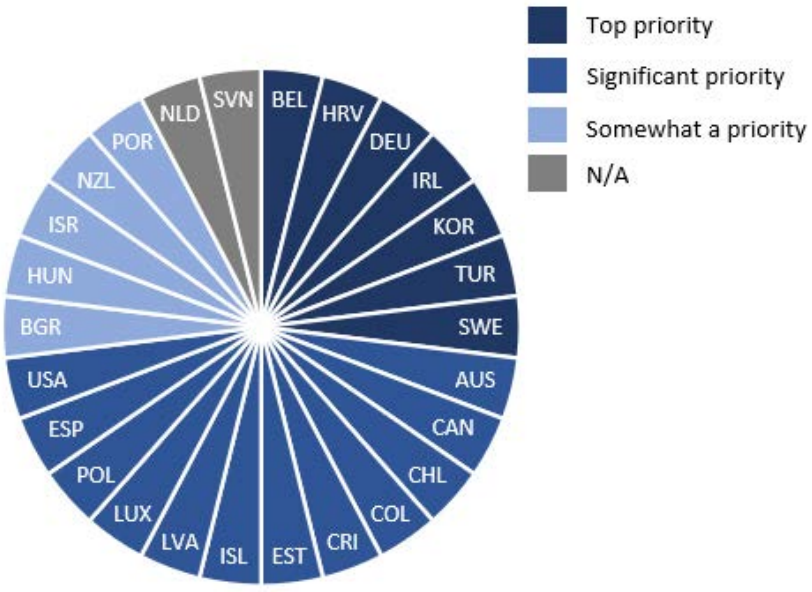
The state policy planning framework manages, adjusts and monitors the different levels of policy planning documents, changes in political actors (governments) and their priorities. It includes managing long-term development plans, the government's medium- to short-term action plans and sector plans.

At defined periods, line ministries report to the CoG on the progress of the plans and explain the implementation of tasks that have not been sufficiently achieved. The existing system is flexible, as it provides continuity for national long-term development; meanwhile, if political actors change, it allows revision of adopted long-term development planning documents and offers new solutions.

Additionally, the Government Project Monitoring Office, an internal body in the Prime Minister's Office, also serves an important monitoring function. This office monitors selected public policies and serves as an important source of information for the Latvian Central Council on its portfolio of specific strategic projects.

Source: (OECD, 2024[5])

Figure 2.5. Priority of monitoring whole-of-government performance for the CoG in OECD countries, 2023



Note: n=26. Respondents to the OECD survey were asked: "How much of a priority are the following functions in the CoG? [Monitoring whole-of-government performance]".
Source: (OECD, 2023[8])

Despite regulatory provisions, particularly in the Rules of Procedure of the Cabinet of Ministers of Ukraine, which stipulate that implementation reports should be produced, performance monitoring remains inconsistent and underdeveloped. A major challenge lies in the lack of a harmonised and fully institutionalised monitoring system. While several digital tools and data platforms exist, their use remains fragmented and uncoordinated. These include the DREAM system for regional recovery project tracking, the Accession Pulse platform, managed by the Government Office for Co-ordination of European and Euro-Atlantic Integration (GOCEEI), for monitoring EU integration commitments, the e-Government platform for service delivery, and various ministerial dashboards and internal databases such as those supporting GPAP monitoring.

In addition, Ukraine maintains the Reform Matrix, a transparency and mapping tool that compiles international and EU-related reform commitments from multiple documents. While not a performance framework per se, the Reform Matrix offers an important reference point for aligning planning and monitoring instruments. However, ministries differ in their approach to data entry, indicator development, and progress tracking. This results in variable quality, lack of comparability, and unclear accountability lines. Moreover, ministries and local authorities are not always equipped with the analytical skills or guidance to formulate relevant performance indicators, assess policy effectiveness, or use results for decision-making.

As Ukraine advances in its EU accession process and public administration reform, greater interoperability, standardisation, and co-ordination across monitoring systems, particularly among SCMU, GOCEEI, the Ministry of Justice, and the Ministry of Finance, will be essential to ensure strategic alignment and transparency.

Recent efforts show some promise. The SCMU has developed a monitoring system to track not just tasks under the GPAP but also the sub-measures within each task, assigning responsibility to individual ministry staff and SCMU verifiers. This system also includes percentage indicators of task completion and offers

visualisation tools for decision-makers. However, coverage remains incomplete, and the system has yet to become a fully integrated performance management tool used in day-to-day strategic governance.

Notably, the practice of convening quarterly and annual reviews with state secretaries and ministers to reflect on progress against targets is a positive step (see UK practice in Box 2.8). These performance dialogues help identify implementation bottlenecks and reallocate resources when necessary. The SCMU's practice of issuing detailed recommendations for the following year, based on an assessment of the current year's delivery record, also contributes to institutional learning. A coherent, government-wide performance framework would help consolidate these emerging practices into a more systematic approach to strategic steering and public accountability.

To move forward, Ukraine could institutionalise performance reviews as a core component of its strategic planning process. This means requiring ministries to set clear policy objectives and KPIs at the planning stage, integrating monitoring frameworks directly into the strategy design. The recently adopted Concept of the National Strategic Planning System (CMU Order No. 853 of 13 August 2025) foresees the establishment of monitoring and evaluation mechanisms, particularly for strategic planning documents in the sphere of socio-economic development. This is a positive development, though ensuring these provisions translate into a broader whole-of-government approach rather than remaining limited to the socio-economic domain will be crucial. A whole-of-government dashboard that tracks implementation, bottlenecks, and outcomes could help decision-makers, donors, and citizens assess progress in real time.

Lessons from OECD countries can guide this reform. The UK's performance framework, where cross-government objectives are translated into concrete departmental plans with regular public updates, is one potential model (see Box 2.8). Another is France's real-time performance pilot system developed by the DITP (see Box 2.9), which links governance, data, and citizen accountability through a national performance dashboard. This system not only tracks outcomes but is used to solve implementation problems and engage citizens with tangible results. For Ukraine, adapting such approaches will require consolidating efforts under a single, integrated framework, rather than multiplying parallel systems. Creating additional unlinked monitoring tools risks overburdening civil servants and undermining coherence, a problem that already affects the current landscape. Ensuring that monitoring reforms translate into streamlined, system-wide monitoring arrangements will be essential to shift the focus from activity-based reporting toward outcome-oriented accountability.

Box 2.8. Monitoring government priorities in the United Kingdom

Monthly and six-monthly state of affairs presented to the Prime Minister

The UK introduced reporting routines at the heart of the Prime Minister's Delivery Unit (PMDU), which provides the rhythm for the unit's work. There are two reporting routines to the Prime Minister: monthly delivery notes and six-monthly delivery reports.

The monthly delivery notes summarise progress for each of the Prime Minister's priorities. They highlight the main issues encountered in a short and data driven fashion and describe what is planned. Where necessary, some notes can be even more frequent.

Six-monthly delivery reports are designed to be a comprehensive assessment of the state of play for all the Prime Minister's priority areas in a given department. They are written by the Head of the PMDU for the Prime Minister and copied to the secretary of state and lead officials. Usually, the drafts are discussed with the lead officials first. Each priority's delivery report is just one page and is intended to:

- Report progress against trajectories for the priority.
- Outline what success looked like for the priority over the next six months.
- Determine the best path forward and identify key actions that needed to be taken.
- Reveal areas of disagreement between the delivery unit and the lead department.
- Act as a reference document against which to chart progress.

Next generation platforms for performance information as used in the United Kingdom

In 2019, the CoG in the United Kingdom started moving towards real-time performance tracking. Triggered by the preparation of Brexit and sped-up by the Covid-19 pandemic, the new internal delivery dashboard, called "Government Performance App" was extended to the top 200 and top 35 government priorities (Government Major Project Portfolio – GMPP). It provides an up-to-date situational picture and allows for early identification of performance risks.

The Government Performance App (GPA) is managed by the Cabinet Office and the HM Treasury and fed by the different departments leading the government priority projects. Consistently with standard operational procedures, at least each four weeks lead departments are requested to coordinate with "contributing" departments and agencies and regularly provide the CoG with information on progress against milestones and deliverables, and related schedules, on expenditures, and on major concerns. In relation to the whole project, each milestone, and expenditures, the Senior Responsible Owners (SROs) of projects in the GMPP also provide their own assessment (on track/off track/pending) and qualitative commentaries in relation to actions planned or taken, deviation from planned schedule, and budget/forecast variance.

The GPA ensures up-to-date information, which is used for drafting monthly delivery notes presenting the state of affairs to the Prime Minister. The Prime Minister's Delivery Unit has full access to information; though focusing on a limited number of key policies, it can get a structured situational overview of progress on the overall Government Major Project Portfolio and draw general conclusions.

Source: (OECD, 2022[21]);

Box 2.9. Monitoring public policies through data and results in France

The French State has several public policy evaluation bodies, but they all rely on an ex-post evaluation method. To address this, France wanted to set up, through its Interministerial Directorate for Public Transformation (DITP), a system aimed at improving the management and monitoring of public policies. This system has three objectives:

1. to provide the Government with a regular and real-time overview of the state of policies throughout the country and their impact on French users and citizens;
2. to detect and assess difficulties in implementing these policies in order to quickly provide concrete solutions;
3. to initiate an accountability process towards citizens by publishing the results.

To meet these objectives, the DITP has set up a governance system to monitor public policies through data and results. Indicators have been defined to evaluate each public policy. Based on these indicators, national and local officials are responsible for defining targets and achieving results. The achievement of these results is the subject of interministerial monitoring meetings that make it possible to align the various objectives and make decisions. To share these results with local and national officials, the DITP has developed a tool to monitor public policies through data and results. Thus, the PILOTE digital dashboard makes it possible to visualize and comment on the results obtained (in the form of progress rates for various indicators) throughout the territory.

From PILOTE, national and local stakeholders can exchange and report the actions necessary to successfully implement the policies followed. Some of these indicators and their data are published as open data via the data.gouv.fr portal and the public action barometer, which has not been updated since July 2024 following the French National Assembly dissolution. They allow each citizen to know the impact of each policy for their department, region and at the national level. This mode of governance through data and the tools used have enabled a new dialogue between stakeholders at the local and national level, by breaking down the traditional silos of the administration. It makes it possible to evaluate the performance of senior executives. In this respect, the prefects, responsible for the deployment of these policies at the departmental or regional level, are evaluated each year. Part of their compensation is now determined based on the results transmitted via PILOTE. From now on, 50 policies are monitored in PILOTE. Their results are analysed using nearly 250 indicators. Their deadlines are set for the year 2026.

Source: (OECD, accessed on 2/05/2025[22])

Transparency and public accountability must be cornerstones of Ukraine's performance management approach. Beyond internal reporting, results from strategic plans and government priorities should be actively communicated to citizens, civil society, and international partners. France's experience with real-time monitoring dashboards under its Interministerial Directorate for Public Transformation (DITP) offers one example: a system designed not only to improve policy delivery, but also to enable open communication of progress and outcomes to the public. Ukraine could draw on this approach to complement existing monitoring systems, helping reinforce trust in government, attract investment, and demonstrate progress toward recovery and reform.

To ensure whole-of-government accountability, Ukraine's performance monitoring system should also better integrate the contributions of regional and local authorities, particularly as they play an increasing role in implementing recovery priorities. Oblast administrations and municipalities should be systematically involved in reporting on the progress of recovery projects and policy actions. This calls for expanding the

reach of national monitoring tools to include local implementation data. Platforms such as the DREAM ecosystem and emerging regional planning dashboards provide promising entry points to enable real-time, decentralised tracking of progress, and should be further institutionalised within Ukraine's monitoring system.

In summary, Ukraine has laid the groundwork for performance monitoring through legal mandates and promising pilot systems. The challenge ahead is to consolidate these efforts into a coherent performance management system that enhances government accountability, supports mid-course corrections, and ultimately improves outcomes for citizens.

Spotlight on recovery

Transparent, real-time monitoring is essential to steer Ukraine's recovery and maintain public trust. While platforms like GPAP and DREAM lay the groundwork for performance-based governance, they currently operate in silos, with no unified framework to link recovery goals, budget allocations, and service delivery outcomes.

Ministries and local actors often use separate tools, and data are not consistently comparable or coordinated. This limits the government's ability to track progress, adjust course, and communicate results to citizens and donors. A common performance architecture is needed to ensure coherence, learning, and accountability across all levels of recovery planning.

To strengthen performance monitoring in support of recovery, Ukraine could:

- Develop a dedicated recovery performance framework that includes core indicators for infrastructure, housing, public services, and economy, to be tracked across national, regional, and local levels.
- Systematically integrate performance metrics into all recovery strategies and action plans, ensuring each has measurable targets, baseline data, and timelines.
- Mandate regular (at least annual) performance reviews for recovery priorities using dashboards accessible to both policymakers and the public.
- Expand the use of the DREAM platform as a real-time implementation monitoring tool, ensuring full participation by local governments and linking it to SCMU's broader GPAP tracking.
- Strengthen SCMU's role in verifying, analysing, and reporting on recovery data, including through cross-ministerial performance dialogues and follow-up mechanisms.
- Ensure transparency and accountability by publishing simplified recovery performance updates that inform donors, parliament, and citizens about tangible progress and remaining gaps.

Linking planning to budgeting

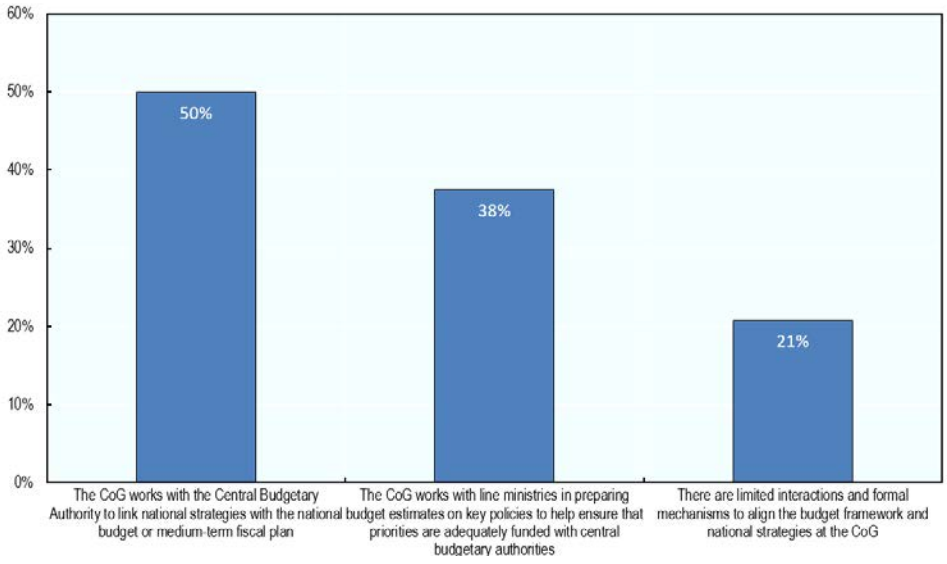
A planning system cannot function effectively if not supported by a strong link to the budget. The OECD Recommendation on Budgetary Governance (OECD/LEGAL/0410) (OECD, 2015[23]) emphasises the need for governments to align strategic priorities with budget allocations and to ensure that financial decisions are informed by performance and policy evidence. In particular, the Recommendation calls for budget frameworks that are forward-looking, transparent, and outcome-oriented, enabling governments to plan sustainably and allocate resources to where they can have the greatest impact. This is especially critical in Ukraine's current context, where the scale of recovery needs and the fiscal constraints imposed by war demand rigorous prioritisation and a realistic alignment of strategies with available funding.

In Ukraine, however, planning and budgeting remain too often decoupled. Line ministries frequently develop ambitious strategic plans that are not aligned with actual budgetary envelopes or medium-term

fiscal priorities. This disconnect undermines implementation and leads to the proliferation of underfunded or unimplementable plans, weakening trust in both the planning and budgeting systems.

This challenge is not unique to Ukraine. Linking strategic planning with the budget remains a common issue across OECD countries. According to the 2023 OECD Centres of Government Survey (OECD, 2023[8]), only half of surveyed OECD governments report that their Centre of Government works closely with the Central Budget Authority to strengthen the connection between plans and budget instruments. In around 21% of OECD countries, mechanisms to ensure this alignment remain limited, highlighting the importance of institutionalised co-ordination and structured processes to close this gap (see Figure 2.6).

Figure 2.6. Ensuring proper financial resources for strategic documents while planning in OECD countries, 2023



Note: n=24. Respondents to the survey were asked: "How does the CoG ensure that the national strategies are properly financed and respect the parameters of the country's fiscal framework?"
Source: (OECD, 2023[8])

A key challenge is the limited role of the Ministry of Finance (MoF) during the early stages of strategy development. While the MoF formally reviews draft strategies before they are submitted to the Cabinet of Ministers, it is often not engaged during the upstream conceptualisation of sectoral strategies. This late-stage involvement makes it harder to influence the design of strategies to ensure financial feasibility and weakens the capacity of the government to allocate resources effectively. According to questionnaire responses in the framework of this Review, SCMU and MoF collaborate in some aspects of GPAP costing but have no structured co-ordination process during the early design phase of sectoral strategies.

Part of the explanation lies in institutional memory. During earlier attempts to coordinate state target programmes, the MoF was formally involved in reviewing financing sources. However, when funding did not materialise despite formal commitments, the MoF did not re-engage substantively in early planning processes. Today, ministries do not consistently include cost estimates in their strategic plans, and when they do, they often lack the precision and realism needed for reliable budgeting.

To address this, Ukraine should gradually institutionalise a more integrated and performance-based approach to budgeting. This would require that all strategic documents, whether sectoral, regional or cross-cutting, include a financial feasibility assessment validated by the MoF before they are approved. Clearer procedures should be introduced to align the annual and medium-term budget frameworks with national

strategic priorities. For example, during the preparation of the Government Priority Action Plan (GPAP), the SCMU already engages with the MoF to discuss the financial viability of proposals, but this practice should be extended and formalised across the strategic planning cycle.

International good practices underscore the importance of collaborative planning between finance ministries and the centre of government. Estonia's approach (see Box 2.10) offers a valuable model: the Ministry of Finance and the Government Office co-lead structured annual dialogues with line ministries to align strategic objectives with budget envelopes. These joint processes ensure that strategies are grounded in financial reality and supported by both policy and fiscal expertise from the outset of the planning cycle.

Box 2.10. Integrating planning and budgetary processes in Estonia

Estonia offers a compelling example of how strategic planning can be effectively integrated with budgetary processes. Its approach is built on early and structured collaboration between the Ministry of Finance (MoF) and the strategic planning unit at the centre of government. Joint planning meetings are held annually before the start of the Medium-Term Expenditure Framework (MTEF) cycle, allowing both strategic priorities and financial constraints to shape government work plans.

Crucially, the MoF is involved from the outset in the preparation of strategic plans, reviewing concept notes and participating in co-design workshops. This ensures that financial feasibility is considered early, and helps prevent misalignments between ambition and available resources.

In addition, joint co-ordination mechanisms between the Government Office and the MoF guide the refinement of performance areas, development strategies, and programme indicators. This collaboration facilitates alignment between policy goals, performance metrics, and funding allocations—reducing duplication and enabling results-based decision-making.

Estonia's experience demonstrates how clear division of roles, continuous dialogue, and a shared commitment to whole-of-government priorities can build a credible and realistic planning and budgeting system. For Ukraine, these practices highlight the value of early MoF engagement, joint indicator design, and structured co-ordination tools to improve implementation feasibility and accountability.

Source: (OECD, 2024[13])

The ongoing reform of Ukraine's public investment management (PIM) system also offers a critical opportunity to better link strategic planning and budgeting. The roadmap on public investment reform adopted in December 2023 sets out a number of measures to establish a single project pipeline and align investment proposals with strategic priorities. These reforms should be more clearly embedded in the broader planning framework, with the Strategic Investment Council playing a key role in prioritising investments based on both policy relevance and fiscal space.

Performance-based budgeting should also be gradually implemented. By tying budget allocations to measurable policy outcomes, Ukraine can ensure that limited fiscal resources are channeled toward programmes that deliver impact. This would require ministries to develop strategies with clear performance indicators and targets, which in turn would guide budgetary decisions. International experience suggests that while performance-based budgeting is complex to operationalise, incremental progress, such as introducing pilot sectors or tying a portion of budget allocation to results, can yield real benefits.

Ultimately, aligning planning with budgeting is not just a technical issue; it is a governance imperative. Ukraine's ability to recover, rebuild, and meet the expectations of its citizens and partners depends on a planning system that reflects fiscal realities and a budgeting system that is guided by strategic goals. This

integration is especially urgent in a post-war context where both needs and resources are immense but constrained.

Spotlight on recovery

The scale of Ukraine's reconstruction needs far exceeds available domestic resources. External support will remain critical, but aligning this support with national recovery priorities and fiscal realities remains a major challenge.

Current recovery frameworks are often developed without realistic costing or early involvement of the Ministry of Finance, resulting in underfunded or disconnected project pipelines. Donor funding risks fragmentation unless financial flows are linked to a unified recovery framework. Without greater integration between planning and budgeting, Ukraine may struggle to prioritise effectively and deliver high-impact results.

To bridge the gap between recovery ambition and available resources, Ukraine could:

- Institutionalise early-stage engagement between SCMU, the Ministry of Finance, and line ministries during the preparation of recovery strategies and investment plans.
- Ensure all major recovery plans are accompanied by feasibility assessments that outline costing scenarios and funding sources, including donor contributions and co-financing mechanisms.
- Leverage the Strategic Investment Council and multi-donor platforms (e.g., the Ukraine Facility, Multi-agency Donor Co-ordination Platform) to align financial planning with national priorities and steer funding where most needed.
- Develop a transparent, public-facing system to track recovery-related expenditures and outcomes, involving the SCMU, the MoF and the RDO, reinforcing trust and supporting co-ordination with international partners.

2.4. The way forward: strengthening Ukraine's strategic planning to support recovery and reform

Ukraine's reform and recovery efforts must rest on a strategic planning system that delivers on national priorities while remaining responsive to urgent needs and constrained resources. A clear hierarchy of planning documents, rigorous quality assurance mechanisms, and strong institutional leadership are fundamental components of this system. Strategic planning must evolve beyond formality and ensure coherence, accountability, and implementation across all levels of government. Ukraine has taken an important step in this direction with the adoption of the Concept of the National Strategic Planning System (CMU Order No. 853 of 13 August 2025) and its Action Plan, which set out a pathway for building a more structured planning system. Translating this into practice will require sustained effort to ensure a whole-of-government perspective that goes beyond the socio-economic sphere, and to sequence reforms in a way that reflects institutional realities and the pace of change.

Strategic planning is not just an administrative exercise; it is a vehicle for rebuilding the country's future. Drawing on global lessons and good practices, Ukraine has the opportunity to build a system that channels national resilience into long-term transformation. If recovery efforts are rooted in shared priorities, strong leadership, and structured planning, they can enable Ukraine not only to rebuild but to reimagine its governance and development trajectory. Moving from commitment to results will require practical measures that go beyond any single document: effective co-ordination across institutions, sustained

capacity building, and transparent monitoring systems that keep implementation on track and allow for adjustment as circumstances evolve.

To reflect Ukraine's current circumstances and future ambitions, the recommendations in this chapter are organised into three groups. EU integration is a cross-cutting priority reflected in all three groups: immediate actions to sustain resilience, recovery measures to anchor reconstruction in EU-related reforms, and long-term steps to consolidate institutional alignment with European standards. Immediate priorities focus on sustaining resilience and ensuring coherence under current conditions. Recovery and reconstruction priorities highlight measures to be taken as institutional and financial capacity expand during the rebuilding phase. Long-term development and EU integration priorities look further ahead, outlining reforms that will consolidate Ukraine's planning system and align it with European standards. Together, these sequenced actions offer a pragmatic yet ambitious pathway for strengthening strategic planning as a driver of recovery, reform, and development. They should be pursued in a sequenced and adaptive manner, ensuring that legislative and institutional reforms are complemented by practical mechanisms to deliver coherence and accountability across government.

The recommendations in this chapter do not prescribe a single institutional model or detailed legislative provisions. Instead, they identify core governance functions and design principles observed across OECD member countries, including: (i) a clearly mandated whole-of-government co-ordination function at the centre of government; (ii) a coherent hierarchy of strategic planning documents linked to budgeting and performance monitoring; (iii) mechanisms for cross-ministerial co-ordination, quality assurance, and stakeholder engagement; and (iv) sufficient flexibility to operate effectively under crisis, recovery, and EU integration conditions.

OECD experience shows that these functions can be fulfilled and distributed across institutions in different ways depending on national context, legal traditions, and the pace of reform. The purpose of this Review is therefore to support Ukrainian authorities in strengthening these core functions, rather than to prescribe specific institutional arrangements or legislative solutions. The recommendations below are intended to support its translation into practice, while addressing governance functions that go beyond the Concept's current scope and will be essential for a whole-of-government planning system.

Sequenced recommendations for strengthening strategic planning in Ukraine

Immediate priorities to sustain resilience and coherence under current conditions

Clarify institutional leadership

- Designate a clear whole-of-government coordinating entity at the centre of government, with a formal mandate to steer strategic planning.
- Reinforce the mandate of the whole-of-government coordinator through relevant amendments to the Rules of Procedure and government resolutions, and resource its planning capacities adequately.
- Ensure the coordinator (SCMU or a future body) has capacity for methodological guidance, feedback, and training to strengthen planning quality.

Kickstarting co-ordination mechanisms between SCMU and line ministries

- Establish a network of planning focal points across ministries, with regular interministerial meetings.
- Use existing committees (e.g. the Government Committee on Recovery and Regional Development) to align sectoral and recovery strategies with regional actors.

Ensuring fiscal realism and budget alignment

- Ensure fiscal realism of plans by engaging the MoF early and at review stage.
- Align GPAP priorities more closely with the medium-term budget framework and EU reform matrices.

Recovery priorities to build the foundations for reconstruction

Building a coherent hierarchy of planning documents

- Establish a coherent and well-defined hierarchy of planning documents, distinguishing long-term vision, medium-term government programme, annual operational planning, and sectoral and regional strategies, with clear rules for cascading objectives across levels.
- Ensure planning guidance sets clear rules for coherence, budgeting links, and EU alignment, whether through updated Rules of Procedure, government resolutions, or future legislation.

Institutionalising whole-of-government co-ordination

- Introduce formal procedures to align GPAP, sector strategies, and EU integration planning instruments early in the policy cycle.
- Leverage EU accession mechanisms (Interagency Working Group, negotiation clusters) to reinforce alignment.

Consolidating and improving the quality of planning documents

- Conduct the strategy audit foreseen in the Concept to consolidate overlapping or outdated documents.
- Establish a central register of planning documents (linked to DREAM and the planned IT platform).

- Institutionalise a quality assurance process led by SCMU, with feasibility checks in co-ordination with MoF, MoECO, and MoJ.
- Provide updated templates, guidance, and training to help ministries and local governments produce focused, outcome-oriented strategies.

Deepening central-local co-ordination

- Revive co-ordination bodies such as the Inter-Departmental Commission for Regional Development, with municipal participation.
- Support oblasts in aggregating and reviewing municipal strategies, acting as intermediaries with SCMU and MDCT.
- Provide tailored assistance and digital tools to help local authorities turn national priorities into local action.

Embedding performance management in delivery

- Require all strategies to include objectives, indicators, and evaluation provisions.
- Establish a government-wide monitoring system under SCMU, integrating existing tools such as GPAP tracking and the DREAM platform into a coherent performance framework.
- Hold structured performance dialogues (quarterly or semi-annual) between SCMU, ministries, and local governments.

Long-term development to consolidate reforms

Formalising the planning hierarchy

- Develop a formal hierarchy distinguishing short-, medium-, and long-term instruments, including EU integration plans.
- Consider an overarching guidance document linking long-term objectives (e.g. 2030–2035) with sectoral and operational strategies.
- Use the Reform Matrix as a mapping tool to align domestic, international, and EU commitments.

Enhancing public participation and transparency in strategic planning

- Institutionalise consultation mechanisms throughout the planning cycle; for major strategies, use collaborative working groups once conditions allow.
- Implement the Law on Public Consultations with digital tools, guidance, and support for ministries and local governments.
- Create advisory platforms for business and civil society, led by SCMU, to consult on priorities (e.g. infrastructure, housing, services). MDCT could support these platforms with digital participation tools (Diia, DREAM).
- Increase transparency by publishing monitoring data and performance of key strategies on accessible dashboards.

Institutionalising performance-informed budgeting

- Institutionalise performance-informed budgeting by linking allocations to monitoring data from strategies and GPAP.
- Ensure the Strategic Investment Council and donor platforms are guided by prioritised, costed plans reflecting fiscal space.

- Define clear rules and mechanisms for integrating strategic and budget planning, with strong MoF involvement from the early stages of strategy development.

Sustaining performance and accountability mechanisms.

- Establish clear mechanisms for monitoring, evaluation, and policy adjustment, and embed them in planning guidance and future legislative frameworks as the system matures.
- Improve interoperability with other performance tools (Accession Pulse, Reform Matrix, EU systems).
- Publish results transparently on dashboards to strengthen accountability and citizen trust.

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3. Reinforcing information integrity

This chapter provides an overview of Ukraine's ongoing efforts to reinforce information integrity and the specific challenges to the information space posed in that country. It reviews and provides recommendations concerning the country's efforts to enhance the transparency, accountability, and plurality of information sources; implement reforms that seek to reinforce institutional architecture to build information integrity; and strengthen societal resilience in the effort to uphold freedom of opinion and expression. It takes into account the current wartime conditions and the need to plan for information integrity under future peace time.

3.1. Expanding Ukraine's democratic reform agenda in the context of Russia's full-scale invasion

Ukraine has long been a target of information attacks that seek to weaken trust in governmental institutions, polarise Ukrainian society, and undermine Ukraine as a trusted international actor. This constant pressure on the information ecosystem, which from the Spring of 2014 has been undertaken as part of Russia's war of aggression against Ukraine, highlights the necessity for Ukraine's government and society to adapt and strengthen information integrity, and uphold freedom of opinion and expression.

Information integrity is the result of an information environment that promotes access to accurate, reliable, evidence-based, and plural information sources and that enable individuals to be exposed to plural and diverse ideas, make informed choices, and better exercise their rights (OECD, 2024[1]). As such, it is an essential component of democratic governance, transparency, and trust. Ukraine, particularly due to its geopolitical position and Russia's ongoing war of aggression, confronts heightened risks from the spread of adversarial threats in the information space and the need to reinforce information integrity and resilience. Informed by the framework put forward in the OECD Recommendation on Information Integrity (see Box 3.1), this chapter analyses Ukraine's efforts to reinforce information integrity largely undertaken since 2014.

Russia's full-scale aggression against Ukraine and the associated attacks on Ukraine's information ecosystem are taking place in the wider context of a multi-year reform process in the country. Reforms in the information space can be separated into two distinct phases. First, the period between the Euromaidan revolution and Russia's seizure of Crimea in 2014 until the start of the full-scale war in February 2022 saw a focus on aligning Ukraine with European Union policies by enhancing transparency in the information space, building government institutions aimed at countering adversarial threats in the information space, strengthening co-operation between governmental and non-governmental actors in the field of strengthening information integrity, and expanding media and information literacy initiatives.

Second, the response to the war and increased scale of information attacks following Russia's full-scale invasion in 2022 led to a heightened focus on public policy responses to threats in the information space in a war context. Since 2022, the Ukrainian government has increased efforts to build its own capacity to counter hostile information threats, work with civil society organisations to strengthen societal resilience, as well as continue with reforms that seek to align Ukraine's legal framework with the European Union's. Russia's full-scale invasion of Ukraine has amplified the human and financial resource constraints on independent and local media, increased reliance on international donors, and led to the introduction of restrictions to speech via martial law that will need to be reversed once the war ends.

Ukraine is navigating a delicate balance between national security interests and freedom of expression amid Russia's ongoing information warfare. Reinforcing information integrity in Ukraine must therefore be grounded in democratic values and undertaken in an effort to maintain and continue the country's ongoing reforms while appreciating its unique present context. As noted in the Recommendation on Information Integrity, policy interventions in this space should be lawful, justified, proportionate, and should respect human rights laws and obligations (OECD, 2024[1]). Public policies that reinforce information integrity are only meaningful and effective in democratic systems where governments uphold human rights. To that end, efforts to protect and promote democratic space should be grounded in efforts to reinforce media pluralism, protect freedom of opinion and of expression, privacy, the rule of law, and independence of judicial and legislative oversight mechanisms (OECD, 2024[1]).

Box 3.1. OECD Recommendation on Information Integrity

The Recommendation on Information Integrity was adopted by the OECD Council on 17 December 2024 on the proposal of the Public Governance Committee (PGC). The Recommendation aims to establish a wide-ranging and applicable policy framework for Adherents to address threats posed by information manipulation and to put in place measures that promote information integrity in line with the universal human rights of freedom of opinion and expression.

The development of the Recommendation built on a multi-year process of research, analysis, and events and involved consultations both within and outside the OECD. The Recommendation complements other existing national and international standards aimed at guaranteeing press freedom and universal human rights, including freedom of opinion and expression.

Building on the detailed policy framework outlined in the *OECD report Facts not Fakes: Tackling Disinformation, Strengthening Information Integrity*, the Recommendation provides an ambitious and actionable international standard that will help governments develop a systemic approach to foster information integrity, relying on a multi-stakeholder approach. It provides guidance for policymakers in democratic governments under three mutually reinforcing building blocks, which together recommend that Adherents:

1. "Strengthen societal resilience" through promoting media literacy and critical thinking skills to provide individuals the capacity and knowledge to navigate the information environment effectively and responsibly, as well as through working with actors across society to develop greater understanding of the evolution of the information landscape and promoting innovation and research;
2. "Enhance the transparency, accountability, and plurality of information sources" by focusing on the role played by digital platforms and traditional media and journalists; and
3. "Upgrade institutional architecture and open government practices" by providing strategic guidance, clear and transparent mandates, and capacity building and sufficient resources to upgrade governmental institutions to respond effectively.

Source: (OECD, 2024[1]) https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0505

The national security considerations during wartime present Ukraine with the need to defend against both physical and information warfare while protecting fundamental values. While international guidance allows for restrictions on civic freedoms in scenarios relevant to Ukraine's war context, these are restricted to times of an officially proclaimed public emergency which threatens the life of the nation, or when provided for by law and to the extent necessary for the protection of national security. Such restrictions, furthermore, should be time-bound, exercised on a temporary basis, include safeguards such as sunset clauses, and be subject to independent review by the legislature, and the restrictions should be precise, necessary, proportionate, and as unintrusive as possible (OECD, 2024[2]). In response to the invasion and ongoing war, the martial law of 2022 noted that "constitutional rights and freedoms of a person and citizen…may be temporarily restricted for the period of martial law (The Office of the President of Ukraine, 2022[3])." The martial law also aligns with Articles 111 and 436-2 of the Criminal Code of Ukraine, which were in place prior to the martial law, and which criminalise supporting armed aggression against Ukraine, legitimising the temporary occupation of Ukrainian territory, or shifting accountability of the aggressor state's actions, as well as criminalise the "justification, recognition as legitimate, or denial of the armed aggression of Russia (Verkhovna Rada of Ukraine, 2025[4])."

That said, even in this context, Ukraine has in many instances continued to expand its democratic reform agenda. The country has implemented a new media law that has brought Ukraine more closely in line with international frameworks, created a single media regulator for television, radio, print media, and streaming services, as well as increased transparency of media ownership. The law has also introduced an innovative co-regulatory mechanism where media actors can establish their own codes of conduct and expert committees to participate in developing information integrity policies; topics could include, for example, establishing clear rules for when an influencer is considered to be online media.

To date, Ukraine has complied with the conditions set out in the International Covenant on Civil and Political Rights and the European Convention on Human Rights (ECHR). The Council of Europe has assessed its legal exemptions ("derogations") to its obligations with respect to freedom of expression as being validly declared, though also clarified that the derogations should be understood as temporary and as 'a continuing process', given the ongoing wartime context (Council of Europe, 2025[5]). Unlike many governments that restrict internet access during security crises, Ukraine has maintained connectivity and journalists continue to report on highly sensitive issues of alleged military leadership misconduct corruption (Dvorovyi, Cherevka and Benequista, 2023[6]). Ukrainian civil society also remains actively engaged in monitoring media reforms and implementation, and following the start of the war, public support for democratic values, including free speech increased (Dvorovyi, Cherevka and Benequista, 2023[6]).

In Ukraine's context, reinforcing information integrity requires putting in place a whole-of-society approach that helps provide oversight for government action, as well as builds societal resilience to information threats. As discussed in the final section of this chapter, bringing together actors from across society to monitor government action and the implementation of legislation, as well as independent judicial review and legislative oversight, will provide crucial checks and help ensure government actions remain proportionate to the national security threats faced. Furthermore, building resilience by equipping citizens to distinguish credible information will also help maintain free discourse. Media co-regulation, as seen in Ukraine's model, can help develop context-specific standards while preserving industry independence. International organisations, such as the Council of Europe, OECD, UNESCO, among others, can provide external assessments of Ukrainian policies' alignment with global human rights standards. Over the medium-term, Ukraine should focus on building its information space in line with international standards, notably as part of its broader EU integration process, and prepare for when restrictions are no longer justified.

Reform history and policy setting in Ukraine

Ukraine has undertaken considerable legislative reforms aiming at enhancing freedom of speech and transparency since 2014. Up to the invasion in February 2022, the media landscape was becoming more plural, the country pursued efforts to curtail corruption and promote transparency, and reforms were undertaken to support media integrity and local democratic participation (Fernandez Gibaja and Hudson, 2022[7]). Reforms following the 2014 Euromaidan demonstrations broadly sought to bring Ukraine closer to the European Union, including reduced legal pressure on the media and political influence of state-owned outlets, as well as improvements to the law on access to information, increased autonomy of the broadcasting regulator, and legislation introducing mandatory disclosure of media ownership and final beneficiaries (Freedom House, 2015[8]) (Freedom House, 2016[9]). These reforms have resulted in improved international standing regarding press freedom, where Ukraine's position improved from 97th to 62nd (out of 180 countries evaluated) between 2021 and 2025 (Reporters without Borders, 2025[10]).

Nevertheless, the implementation of the reform efforts faced obstacles even during the period prior to the full-scale invasion in February 2022. Regulatory bodies, such as the National Council on Television and Radio Broadcasting, were constrained by financial, technological, and human resource limitations. Ukraine has also been targeted throughout this time by hostile information interference campaigns,[1] mostly Russian. Malign actors attempt to interfere in the information space through co-ordinated networks that

include official government communications, state-sponsored media, social media influencers, and proxy sources. These networks often manipulate content to promote malign and inauthentic narratives while maintaining plausible deniability and making it difficult for audiences to distinguish fact from propaganda (Global Affairs Canada, 2024[11]) (VIGINUM, 2025[12]). Russian information operations against Ukraine also target international audiences, which has led the government to focus on responding with a global perspective, as well.

The spread of hostile information interference campaigns in Ukraine reflects wider challenges related to the shift in how information is produced and distributed in the last two decades, where platform and algorithm designs can amplify the spread of information, provide new avenues for engagement and manipulation, and alter who and what people trust (OECD, 2024[13]). Ukraine has undertaken its reform efforts in this rapidly changing information environment, all of which has been magnified by Russian aggression.

The information space in Ukraine during Russia's full-scale invasion of Ukraine

Russian interference in the information space has significantly increased since Russia's full-scale invasion in February 2022. In turn, Ukraine's comprehensive response to Russian hybrid warfare threats (including both information and cyber threats)has built upon progress made in strengthening the information and media environment since 2014: establishing institutional mechanisms to respond directly to information and cyber threats; improved co-ordination between governmental and non-governmental actors; upgraded government strategic communication and efforts to provide accurate public information; and strengthening resilience of the media environment (OECD, 2022[14]).

Since 2022, campaigns driven by Russia have largely aimed to justify the invasion, for example by portraying Ukraine as a threat or claiming to protect Russian-speaking populations, demoralise the Ukrainian population and armed forces, divide international support, and obscure war crimes (OECD, 2022[15]). In addition, Russia's war of aggression against Ukraine is notable for the extent to which it is being waged and shared online. While social media have played a role in previous wars, Russia's full-scale invasion of Ukraine has illustrated how social media is changing the way war can be chronicled, experienced and understood (The Economist, 2022[16]).

This change is largely due to the rapid rise in internet coverage and the use of social media in Ukraine. According to the Ministry of Digital Transformation, immediately before the start of the Russian's full-scale invasion, 96% of Ukrainians had access to 4G mobile networks from at least one operator (January 2022), compared to 76% in 2019 (The Economist, 2022[16]). According to data provided by the Ministry of Digital Transformation of Ukraine, in October 2025, 60.5% of mobile terminals in Ukraine operated on 4G networks and 23.4% on 5G networks (Ministry of Digital Transformation, 2025[17]).

This transition to faster networks continues to support changes in news consumption habits. In 2024, 90% of Ukrainians used smartphones to access news, highlighting the shift toward mobile news consumption (Internews network, 2024[18]). This trend is especially pronounced among internally displaced persons, frontline residents, and the military, who rely heavily on mobile devices and platforms like Telegram for information (Bezchotnikova and Zrazhevska, 2024[19]). The start of Russia's war of aggression against Ukraine also saw a large increase in the use of social networks as a source of news. In 2024, 84% of respondents identified social media as their primary news source, up from 76% in 2023, and 40% relied exclusively on social media for news. On the contrary, the use of online news websites as the primary source declined from 41% in 2023 to 30% in 2024 (Internews network, 2024[18]).

Television has remained the primary news source for about 30% of respondents, while radio and print media are not the primary source for many. Telegram has emerged as the leading platform for news dissemination, with 73% of Ukrainians using it for news in 2024. The platform is used by Ukrainian government institutions and policy-makers, as well as non-governmental actors and the media. Its

popularity is attributed to its immediacy and low data requirements, making it accessible even in areas with limited internet connectivity (Internews network, 2024[18]).

In this context and based on the OECD Recommendation on Information Integrity, this chapter covers the country's efforts to implement reforms that seek to:

- Enhance the transparency, accountability, and plurality of information sources.
- Reinforce institutional architecture to build information integrity; and
- Strengthen societal resilience.

3.2. Enhancing the transparency, accountability, and plurality of information sources

Building information integrity rests in large part on ensuring public policies help promote transparent and diverse media and information spaces. Given the role of the actors that produce content and the channels via which it is distributed, namely online and social media platforms and traditional media, ensuring that policies support transparency and freedom of opinion and expression is critical.

In Ukraine, the context of its ongoing reform process and Russia's war of aggression reiterate the importance of putting in place public policies that promote democratic engagement. This includes ensuring that the country's laws align with international frameworks that uphold freedom of opinion and expression and that policy interventions are lawful, justified, proportionate, and respecting of human rights laws and obligations. Moving forward, it will be important to continue to ensure that laws passed in the context of Russia's war of aggression are not used to unduly restrict freedom of opinion and expression.

Reform efforts should continue to align Ukraine's legal context with international frameworks that uphold freedom of opinion and expression

The war in Ukraine has reiterated the benefits of policies that increase transparency in the information space. Information posted on online platforms has helped give a voice to underrepresented groups and plays an increasingly important role in analysing the war, physical and information threats, and even in documenting war crimes. Such open-source intelligence, or OSINT, can include satellite images, videos, and pictures (OHCHR and Human Rights Center at UC Berkeley, School of Law, 2022[20]). Platforms also, however, serve as spaces for actors to spread manipulated content, often aimed at increasing polarisation and reducing trust in public institutions, which can affect people's perceptions and influence and mainstream media coverage. More fully understanding how information is shared, the sources of hostile information threats and what interventions are most successful – all within the bounds of ensuring user privacy and freedom of expression – are relevant for responding to disinformation related to the war in Ukraine and beyond (OECD, 2022[14]).

The legal framework in this space should align with international standards and continue to support Ukraine's broader EU integration process. For example, the Council of Europe recommended that tools and initiatives designed to restrict the activities of malign foreign actors be "targeted and…address a specific security problem," that they "provide a clear, complete, and understandable justification" for action, and to "ensure the competence of the national regulator to regulate of online platforms in accordance with the EU and Council of Europe standards (Council of Europe, 2025[21])."

On a more operational level, the Center for Countering Disinformation (CCD) shares evidence-based analytical reports to platforms, which cite violations of Ukrainian law and provide context to platform moderators. These reports seek to reduce manipulative content and content that might provoke panic by flagging notifications of false reports about air defence failures, deepfake videos of political or military figures, messages designed to incite panic about energy blackouts or bombings, and calls to violence.

Ukraine's efforts to engage with online platforms on countering hostile information threats and promoting information integrity are limited by many of the same issues governments elsewhere face in the absence of clearly defined and transparent relationships with platforms that promote freedom of speech. This situation is made more complicated in that Ukraine is not a member of the European Union, though Ukrainian institutions are trying to overcome this limitation in part by establishing closer co-operation between the National Council on Television and Radio Broadcasting and partner institutions in EU member states.

For its part, the National Council monitors YouTube, Telegram (see Box 3.2 for discussions on policy discussions related to Telegram in Ukraine), and other online platforms for war-related disinformation, hate speech, and content endangering children. If violations are found, they follow the standard content reporting procedures of each platform (e.g., flagging via YouTube's community reporting system). The National Council has also signed a memorandum of understanding with the Center for Countering Disinformation on information exchange and co-ordination of activities.

Ukraine also focuses on tackling information manipulation tactics and techniques. For example, operating bot farms and engaging in artificial amplification techniques, such as creating fake social media accounts to manipulate public opinion, could be punished under several provisions of the Criminal Code, including: Article 361: Unauthorised Interference in Information Systems; Article 361-2: Unauthorised Sale or Distribution of Restricted Information; Article 190: Fraud; and Article 259: Knowingly False Notification of Threats (Ministry of Internal Affairs of Ukraine, 2023[22]).

Criminal proceedings against violators largely target actors who are running the bot farms rather than the platforms on which they operate. For example, in 2022, the Security Service of Ukraine (SBU) dismantled operations of 35 bot farms physically operating in Ukrainian territory, most of which were acting in the interests of Russian intelligence services and used to spread content designed to destabilise the country (Security Service of Ukraine, 2022[23]). In 2023, the Cyber Police dismantled a network involving more than 100 individuals who operated bot farms using approximately 150 000 SIM cards, which allowed them to simulate the activity of internet users and hide real identities when accessing the internet. These fake accounts were used to spread hostile propaganda, distribute illegal content, and engage in internet fraud (The Ministry of Interior of Ukraine, 2023[24]).

Box 3.2. Discussions on public policy related to Telegram in Ukraine

The use of Telegram as a source of information grew rapidly following the 2022 invasion. In 2021, 40% of Ukrainians used Telegram, and 20% used it as a source of news, whereas by 2024, 81% used Telegram, and 73% used is as a main source of the news from online platforms, compared to 19% for YouTube and 16% for Facebook.

Ukraine's Center for Countering Disinformation has found that Russia uses Telegram to target the Ukrainian population to sow discord and to gather sensitive data. In addition, the suspected use of Telegram for unlawful information operations have led to calls for blocking Telegram in Ukraine. These calls have met considerable opposition given that Ukrainian government institutions, politicians, non-governmental actors, and the media use the platform, including for public communication, for example through the accounts of the Office of the President, the Ministry of Foreign Affairs, and the Ministry of Defence.

In 2024, 9% of Ukrainians supported a complete ban of Telegram; most Ukrainians (54%) believe that it should not be banned completely, though instead face specific restrictions and controls, such as blocking certain channels. At the same time, support for the ban would be noticeably higher (60%) if Telegram would refuse to block the channels used by Russia for spreading disinformation.

In 2024, the National Coordination Center for Cybersecurity (NCCC) restricted the use of Telegram in government agencies, military, and critical infrastructure facilities due to security concerns, and the CCD published a list of trusted Telegram channels, including channels of governmental institutions, public officials, state companies, and public media outlets.

In 2025, Ukraine put forward the draft law "On Amending Certain Laws of Ukraine Regarding the Regulation of Activities of Information-Sharing Platforms through which Mass Information is Disseminated", largely with the intent to reduce the threats to national security posed by Telegram. In doing so, the draft law proposes a framework that, while seeking to provide clarity on online platforms, offers what the Council of Europe has found to be duplicative, overly general, and potentially intrusive requirements, pointing to the inherent challenges of policy making in this space.

Source: (Internews network, 2021[25]) (Internews network, 2024[18]) (Center for Countering Disinformation, 2023[26]) (Kyiv International Institute of Sociology, 2024[27]) (National Security and Defence Council, 2024[28]) (Council of Europe, 2025[21])

Efforts should continue to ensure national security considerations in the context of the war are not used to unduly restrict freedom of opinion and expression

Ukraine's reforms since 2014 have continued to result in improved international standing in freedom of opinion and expression. The World Press Freedom Index showed that in 2025, Ukraine's position has improved to 62nd from 97th in 2021 (out of 180 countries evaluated) and from 126th in 2013 (Reporters without Borders, 2025[10]) (Reporters without Borders, 2014[29]). Ukraine also has a dynamic community of investigative journalists and independent media and civil society organisations. Together, these reforms have been largely in line with obligations to protect and defend freedom of opinion expression, as well as recommendations to foster public interest information ecosystems that promote access to information and protect independent and pluralistic media (OECD, 2024[2]) (OECD, 2024[1]).

Outlets such as Slidstvo.Info, Bihus.Info, Ukrainska Pravda, and Schemes (Skhemy) have exposed illicit enrichment and corruption schemes involving state procurement, defence spending, and judicial corruption leading to criminal cases and dismissals of high-ranking officials. These organisations continue to operate independently, increasingly relying on diverse funding sources – including grants from international donors

and Ukrainian supporters, independent fundraising campaigns, and the development of hybrid business models – to help ensure their sustainability in a challenging economic environment and reduce their vulnerability to political pressure. Additionally, CSOs such as Detector Media and the Institute of Mass Information monitor compliance with media standards, support investigations, and advocate for journalists' rights. This ecosystem creates a buffer against attempts to suppress or co-opt critical voices.

In the context of the ongoing war, Ukraine's martial law provides broad regulatory measures over media and communications, and separate Security Council and regulatory decisions have banned or restricted specific outlets deemed threats to national security. These measures, while justified by wartime security, require oversight from independent actors and civil society, both during the war and for post-war re-evaluation, amid Ukraine's broader EU alignment efforts. The country's martial law, which is the primary influence on Ukraine's expanded regulatory powers following Russia's full-scale invasion in February 2022, is in tension with the country's broad effort to align its policies more closely to the European Union. President Volodymyr Zelensky enacted this decree (Presidential Decree No. 64/2022) on 24 February 2022 and declared martial law across Ukraine in response to Russia's full-scale invasion.

The decree stated that, "in connection with the introduction of martial law in Ukraine, constitutional rights and freedoms of a person and citizen…may be temporarily restricted for the period of martial law (The Office of the President of Ukraine, 2022[3])." The decree authorised potential limits, including to Article 34 of the Ukrainian Constitution, which states that, "Everyone is guaranteed the right to freedom of thought and speech, and to the free expression of his or her views and beliefs," and that "everyone has the right to freely collect, store, use and disseminate information by oral, written or other means of his or her choice. The exercise of these rights may be restricted by law in the interests of national security, territorial indivisibility or public order, with the purpose of preventing disturbances or crimes, protecting the health of the population, the reputation or rights of other persons, preventing the publication of information received confidentially, or supporting the authority and impartiality of justice". Notably, this decree does not affect Article 15 of the Ukrainian Constitution, which prohibits censorship (Verkhovna Rada of Ukraine, 1996[30]).

In 2024, the Ukrainian parliament discussed several amendments to the Criminal Code, including new powers that seek to expand control over the information space in the context of the war. As noted by the Council of Europe, these amendments should be updated to include an explicit protection for the disclosure of confidential information in the public interest, including by safeguarding the rights of journalists and protecting whistleblowers (Council of Europe, 2025[5]). These amendments have not been adopted by the Verkhovna Rada, and the process of public discussion is ongoing.

The range of restrictions put in place by the government in response to the war largely cover restrictions on outlets, language, content, and internet access more widely. Importantly, the laws specify that any restrictions must comply with the European Convention on Human Rights requiring that limitations on freedom of expression be lawful, proportionate, and necessary in a democratic society. They are also in line with Article 4 of the ICCPR and Article 15 of the ECHR, which allow for derogations to the right to freedom of expression (though not freedom of opinion), "in time of public emergency which threatens the life of the nation" but only "to the extent strictly required by the exigencies of the situation" and "provided that such measures are not inconsistent with its other obligations under international law (Council of Europe, 2025[5]).

Protecting media and speech freedoms is essential in democratic societies. Likewise, reducing harassment and attacks on journalists – particularly difficult in the context of Russia's armed aggression – and ensuring media pluralism while avoiding capture by other interests, remain critical to strengthening the media environment in Ukraine and beyond (OECD, 2022[31]). Moving forward, Ukraine should continue to ensure that its legal environment meets it legal obligations, that the laws are not applied arbitrarily, and that provisions are directed to an actual, clear, present or imminent danger (Council of Europe, 2025[5]; OECD, 2022[31]; OECD, 2024[2]). Ultimately, the sweeping powers granted to the state should be analysed in the

specific context of Ukraine's security concerns and not be used to justify the imposition of restrictions on freedom of opinion and expression more widely.

Limits on outlets and channels

Prior to the start of the full-scale aggression, restrictions in the information space sought to reduce Russian influence by limiting the impact of Russian state-backed outlets and favouring Ukrainian-language media. Ukraine first implemented bans on information outlets linked to Russia following the aggression in 2014, when Ukraine banned 14 TV channels for "spreading war propaganda" (Reuters, 2014[32]). In 2017, the Decree of the President of Ukraine No. 133/2017 enacted the decision of the National Security and Defence Council of Ukraine to impose sanctions on a range of individuals and legal entities, particularly targeting Russian companies and online services, including social networks like VKontakte and Odnoklassniki, as well as the companies Mail.ru and Yandex, in response to cyber and information threats (The Office of the President of Ukraine, 2017[33]).

Between 2014 and 2021, a series of presidential decrees resulted in the blocking of 633 internet resources, including Russian media outlets, payment systems like Webmoney and Qiwi, and websites associated with the occupation authorities of Crimea. One of the most prominent examples of this policy was the ban in 2021 on three Ukrainian television channels: 112 Ukraine, NewsOne, and ZIK. In 2021, Ukraine used the Law on Sanctions to impose restrictions on three TV channels linked to pro-Russian politician Taras Kozak, citing national security threats. The martial law has also been used to ban outlets connected with the spread of Russian-linked hostile information campaigns, including the websites rodina.news and all-news.net, though its application has been found to be proportional, overall (European Commission, 2024[34]). While many blocked outlets were based in Russia (Dvorovyi, 2021[35]) the government has banned channels and pages of sanctioned Russian propagandists on YouTube, Facebook, Twitter, and Telegram (Freedom House, 2024[36]).

In addition, Article 126 of Law No. 2849-IX on Media establishes the procedure for designating individuals and entities that pose a threat to national security through media activities. This list is kept by the Ministry of Culture and Strategic Communications (MCSC), based on inputs from the National Security and Defence Council, the Security Service of Ukraine, and the National Council of Television and Radio Broadcasting. Inclusion on the list can lead to restrictions on licensing, distribution, and audience access in Ukraine. Notably, the law also provides a judicial appeal mechanism and mandates that decisions must be well-founded, clearly defined, and allow for the possibility of appeal (Verkhovna Rada of Ukraine, 2025[37]).

Freedom House flagged the independent media regulator's (National Council of Television and Radio Broadcasting of Ukraine, NCTRB) ability to close news sites that are not officially registered as media without a court order, and a prominent media outlet raised concerns over political pressure that was seen as threatening to its independence (Freedom House, 2025[38]). In 2022, media outlets affiliated with opposition politicians have faced administrative hurdles or and removed from a terrestrial broadcasting channel under justifications that were criticised as being not sufficiently transparent, which could potentially have a chilling effect. Moving forward, Ukrainian authorities' powers in this space should be guided by transparency and alignment with international standards to avoid undue restrictions on freedom of expression and being misused against voices critical of the government.

Moving forward, the application of these legislative powers should be applied transparently and without discrimination, informed by oversight and scrutiny from civil society and the EU. Specifically, the European Commission noted that while restrictions on outlets and channels introduced by Ukraine since the start of the war are "legitimately rooted in national security concerns," it also notes that "the Ukrainian government should provide a clear vision for the re-establishment of rights and freedoms after martial law ends (Freedom House, 2024[36]) (European Commission, 2023[39])."

Ukrainian language requirements

In an effort to strengthen the position of the Ukrainian language and reduce the influence of other languages, particularly Russian, which had dominated the information space, Ukraine passed a law on 16 January 2022 – one month before Russia's full-scale military invasion – requiring all national print media to be published in Ukrainian. Publications in other languages are permitted if accompanied by an identical Ukrainian version released simultaneously, though exceptions apply to media published in Crimean Tatar, English, or other official EU languages.

Article 40 of the Law on Media stipulates the use of the Ukrainian language in audio and audiovisual media and sets mandatory quotas for programs, films, songs, and news broadcasts depending on the type of broadcaster (national, regional, local), format, and languages of national minorities. The law requires that at least 90% of television content during prime time on national and regional TV channels be in the Ukrainian language, and at least 80% for local TV channels. While the law does not detail specific language requirements for online content, it does emphasise the importance of Ukrainian language use in digital media (Verkhovna Rada of Ukraine, 2025[37]).

Internet access restrictions

In December 2020, Parliament adopted the Law on Electronic Communications, which provides for the possibility of temporarily limiting internet access in the context of antiterrorist operations. The law also allows for internet access restrictions during states of emergency or martial law, when "special rules" may be introduced regarding "the connection and transmission of information through computer networks."[2] Similar powers are granted to the military under martial law. These provisions, however, have not yet been applied in practice (Freedom House, 2024[36]), in part because they were adopted before the start of the full-scale invasion and were designed for a more limited context of local anti-terrorist operations. Moving forward, it would be advisable to continue to restrain from using this tool and to be transparent about process and motivation of its use.

Content limits

Ukraine's wartime legal framework, including its martial law, enables the enforcement of restrictions on specific types of content, based on current legislation, including the Law on Media (Articles 36 and 119). While the country has largely balanced its national security considerations during wartime with continued protections of universal human rights, these restrictions focus on criminalising pro-Russian propaganda, denial of Russian aggression, calls against territorial integrity, and unauthorised disclosure of military information during the war (see Box 3.3).

Since the start of the war in 2022, several individuals have been charged under the laws that prohibit public calls for the infringement of Ukraine's territorial integrity, that criminalise collaboration with "aggressor states," and that criminalise the justification, recognition as legitimate, or denial of the armed aggression of Russian against Ukraine. These charges sometimes solely concern online activities, while other charges include material collaboration with the Russian military or intelligence agencies (Freedom House, 2024[36]).

Box 3.3. Overview of the legal framework concerning the information space in Ukraine

- **Criminal Code of Ukraine** Article 110, which prohibits public calls for the infringement of Ukraine's territorial integrity, and Article 111-1, which states that Ukrainian citizens who engage in propaganda within educational institutions with the aim of supporting armed aggression against Ukraine, legitimising the temporary occupation of Ukrainian territory, or shifting accountability of the aggressor state's actions, may be imprisoned.
- **Criminal Code of Ukraine** Article 114-2, which establishes criminal liability for the unauthorised dissemination of information during martial law or a state of emergency about the movement, transportation, or location of weapons, ammunition, troops, or other military formations.
- **Criminal Code of Ukraine** Article 436-2, which criminalises justifying, recognising as legitimate, or denying the armed aggression of Russia against Ukraine since 2014, including misrepresenting it as an internal civil conflict or glorifying participants involved in the aggression.
- **Ukraine's Law on Media** Article 36, which prohibits the dissemination of calls for violent change, overthrow of the constitutional order, initiation or conduct of an aggressive war or military conflict, violation of the territorial integrity of Ukraine, elimination of Ukraine's independence, information that justifies or promotes such actions. The law also bans any form of propaganda supporting the Russian government, its war against Ukraine, and the use of associated symbols that are equated with terrorism and Nazi ideology. Beyond the immediate context of the war, the law forbids the glorification of communist and Nazi regimes, content promoting drug use, cruelty, or violence. Additionally, the law bans information that denies or disparages the existence the Ukrainian language, nation, or statehood. The National Council for Television and Radio Broadcasting of Ukraine, together with its joint regulatory body, is tasked with developing and approving criteria for classifying information as violating requirements of this article.
- **Ukraine's Law on Media** Chapter IX, which outlines exceptional regulations for media during a time of armed aggression. These provisions take effect when the Verkhovna Rada of Ukraine officially recognises a state as an aggressor or occupying power. This law restricts Ukrainian media from disseminating content that misrepresents the war; prevents outlets from being owned, controlled, or funded by citizens or organisations linked to Russia; prevents the registration and distribution of foreign media affiliated with Russia based on the public registry that identifies such services.

Source: (Verkhovna Rada of Ukraine, 2025[4]; Verkhovna Rada of Ukraine, 2025[37])

The application of martial law has also resulted in reporting restrictions for journalists, especially on the frontline. For example, Ukrainian authorities have increased control over the flow of information, especially concerning military operations, troop movements, and battlefield outcomes. Journalists wishing to report from the frontlines must obtain official accreditation from the Armed Forces of Ukraine. Accredited journalists often must be accompanied with military units or guided by military press officers, which can restrict their freedom to move and investigate independently. Some frontline areas or liberated zones are declared off-limits to media for operational or security reasons. Journalists can be denied access or detained if found reporting without permission or violating security protocols. According to Chief of Ukrainian Armed Forces Order No. 73, it is prohibited to publicly share sensitive military information during wartime, including troop locations, unit names, equipment details, and operational plans. This ban applies to both military personnel and media representatives, aiming to protect national security and prevent intelligence leaks to the enemy. Violations of these rules may result in legal consequences under Ukrainian law (Commander-in-Chief of the Armed Forces of Ukraine, 2024[40]). In addition to government restrictions,

journalists report great self-censoring; a 2023 study found that 78% of respondents linked the Russian invasion to a rise in such cases (ZMINA, 2023[41]).

Despite these restrictions, the European Commission has noted that the application of the powers the Ukrainian government has under martial law to restrict individual rights and freedoms have been "largely in proportion to the security situation and have generally been applied with caution." The Commission also notes that "the government has maintained its overall respect for fundamental rights and has shown its commitment to protecting them and further aligning with the EU *acquis*, despite the restraints due to the ongoing war and martial law (European Commission, 2024[34])."

The Ukrainian media environment has undergone a series of reforms though continues to face weaknesses and vulnerabilities

Ukraine's efforts to strengthen its media sector since 2014 have been a driving force of its efforts to reinforce information integrity. The importance of an independent and pluralistic media sector is in line with the OECD Recommendation on Information Integrity, as well as the Council of Europe's guidelines in this area, which call on building a healthy media ecosystem that provides a steady and abundant supply of quality information by recognised trustworthy sources (Council of Europe, 2023[42]).

The establishment of a public broadcaster, Suspilne (Public Broadcasting Company of Ukraine, originally known as UA:PBC), in January 2017 was part of Ukraine's efforts to meet European standards and practices. Following its registration, Suspilne focused on capacity strengthening and the adoption of strategic documents to solidify its independence. The Council of Europe has supported the implementation of Suspilne's strategic plans and policies, including with a focus on improving internal controls and strengthening transparency and accountability. For example, in 2024, the CoE supported the revision of Suspilne's regulations related to elections to its Management Board to align with standards of democratic governance and media independence. The Council of Europe will continue to monitor elections, ensuring that the process remains transparent and free from external influence as part of its continued co-operation with Suspilne (Council of Europe, 2025[43]).

Independent media organisations in Ukraine have noted Suspilne's high – and improving – quality (Institute of Mass Information, 2021[44]) ((n.a.), 2025[45]). At the same time, it has faced funding shortages, particularly since the full-scale invasion. Per Ukrainian legislation, the public broadcaster is set to receive 0,2% of the total budget spending, though this amount is actually lower given that during the war, defence spending is excluded from these budgetary calculations. That said, funding for Suspilne rose roughly 17% in 2025 compared to 2024 (UAH 1,85 billion to UAH 2,18 billion) (Verkhovna Rada of Ukraine, 2024[46]), and rose by a further UAH 297 million in 2026, increasing the budget for the National Public Broadcasting Company to UAH 2.47 billion (Verkhovna Rada of Ukraine, 2025[47]). Moving forward, a continued focus on ensuring long-term funding stability for the public broadcaster will help it to function stably and to maintain necessary levels of coverage and staffing (Centre for Democracy and Rule of Law, 2024[48]).

Alongside Suspilne's formalisation and professionalisation, the 2015 Law No. 917-VIII on Reforming State and Communal Print Media required privatisation of state-owned printed media (OECD, 2022[15]). Several other relevant reforms and changes came about following the 2014 Euromaidan demonstrations, which broadly sought to bring Ukraine closer to the European Union, including reduced legal pressure on the media and political influence of state-owned outlets, as well as improvements to the law on access to information, increased autonomy of the broadcasting regulator, and legislation introducing mandatory disclosure of media ownership and final beneficiaries (Freedom House, 2015[8]) (Freedom House, 2016[9]). The success of these reforms was reflected in the jump in the country's World Press Freedom Index Rank from 2014 to 2016. Ukraine's score remained relatively stable until 2022, when it dropped slightly due to the challenges and threats to journalists due to the war (Reporters Without Borders, 2022[49]).[3]

While Ukraine's media landscape is diverse, it remains partly controlled by oligarchs who own the majority of the national TV channels (Reporters without Borders, 2024[50]). Many Ukrainian media outlets depend on funding from a small group of owners, making them vulnerable to political and economic pressure. To counteract this, Ukraine passed Law No. 1780-IX “On the Prevention of Threats to National Security Related to the Excessive Influence of Persons Who Have Significant Economic and Political Weight in Public Life (Oligarchs)” on 23 September 2021, which sought to reduce the disproportionate influence of oligarchs on Ukraine's political and economic system.

As the result of the law, former President Petro Poroshenko transferred ownership of his two major television channels to their employees in 2021, and in 2022, Rinat Akhmetov, at that time Ukraine's wealthiest individual, declared his intention to sell his media assets. That said, the Venice Commission noted in 2023 that the “Law on Prevention of Threats to National Security Related to Excessive Influence of Persons with Significant Economic and Political Weight in Public Life (Oligarchs)” took a “personal approach” that sought to identify persons as “oligarchs” through specific criteria, such as wealth and media ownership, rather than pursuing a multi-sectoral, systemic approach. Notably, the new Law on Media addresses the transparency issues that the Law on Oligarchs sought to tackle in the media sphere. Unlike the Law on Oligarchs, which is a separate instrument with its own procedures, the Law on Media contains mechanisms for identifying opaque ownership structures and limiting the influence of individuals on editorial policies of media outlets. The National Council has also adopted several bylaws and launched the relevant procedures for registration, reporting, and monitoring of media entities in accordance with the new legal requirements.

Indeed, a strength of the Ukrainian legal framework in the information space is its emphasis on transparency of media ownership. In 2015, Law No. 674-VIII "On Amendments to Certain Laws of Ukraine Regarding Ensuring Transparency of Media Ownership and Implementation of the Principles of State Policy in the Sphere of Television and Radio Broadcasting" (Verkhovna Rada of Ukraine, 2015[51]) mandated that television and radio broadcasters disclose detailed ownership information, including ultimate beneficial owners, to the National Council and on their websites. This initiative was further strengthened in 2022 in the new Law on Media (Verkhovna Rada of Ukraine, 2025[37]), which expanded transparency requirements to encompass a broader range of media types, including online platforms and video-sharing services. The law also prohibits media entities from maintaining any ownership or financial ties with aggressor states, explicitly targeting Russian influence.

These legislative actions have both made media ownership more transparent and have strengthened resilience of Ukraine's information space against foreign interference, serving as a potential model for other countries confronting similar challenges. This move toward increased transparency has been supported by journalist investigations and engagement with civil society. It aligns with the call in the OECD Recommendation on Information Integrity to promote transparency and diversity of media ownership, and encourage editorial independence in an effort to prevent undue influence (OECD, 2024[1]). As evidence of the law’s impact, in 2024, the transparency of Ukraine's leading online media outlets increased to 80% (up from 68% in 2023), primarily due to more media organisations disclosing information about their ownership and leadership (Institute of Mass Information, 2024[52]).

Despite the increased transparency of media ownership, however, the war has made implementation of its media sector reforms more challenging. Examples remain of media actors avoiding full disclosure of their ownership, sometimes using intermediaries or holding companies. This is especially problematic in the online media sector, where registration and transparency requirements are weaker or voluntary, enabling individuals to buy domains anonymously.

Public policy in the media sector in response to the wartime context

These reforms have taken place in the context of the specific and very real harms brought by Russia’s ongoing invasions and interference in Ukraine’s physical and information spaces. Journalists have faced

enormous challenges since the start of Russia's war against Ukraine and have had to adapt quickly to the new reality. According to a Reporters without Borders, based on data from the Institute of Mass Information, between the beginning of the Russian aggression in February 2022 and February 2026, 175 abuses against journalists in Ukraine by Russian forces were documented, including war crimes such as killings, injuries, and detentions. Furthermore, 16 journalists have been killed in the line of duty, at least 53 have been injured (many by drones in 2025), and 26 are currently detained by Russia (Reporters Without Borders, 2026[53]). The UN Special Rapporteur on Freedom of Expression also noted that journalists have been "targeted, tortured, kidnapped, attacked and killed, or refused safe passage from cities and regions under siege" (UN, 2022[54]).

In addition to physical threats, the Russian invasion has weakened the Ukrainian economy and caused media outlets to lose subscribers and advertisers. Combined with material destruction, the disruption of supply chains, and the forced exile of employees, many Ukrainian media outlets are facing threats to their survival. Between 2022 and 2024, at least 235 Ukrainian media outlets have closed, while others have reduced their activity and temporarily laid-off their employees without pay (Reporters without Borders, 2025[10]). Local and print media have been the most affected in the face of these challenges. In 2021, 70% of local media outlets said they could cover more than 90% of their own expenses without outside help; by 2023, only 14% of them could do so, illustrating a sharp drop in financial independence (Reporters without Borders, 2024[50]). These economic losses have also had negative impacts on economic resources available to CSOs and other actors in the Ukrainian information space.

In response to this evolving and increasingly difficult context, the Ukrainian government has developed several mechanisms and programs designed to support media and journalists. Ukraine's reforms since 2014 have also helped lay the ground for a more resilient media and information ecosystem, and policy responses that strengthen the environment in which information is created and shared have proven to be relevant in the context of the war. Continuing to promote and maintain a diverse and independent media sector will help ensure the free flow of information; in the context of Ukraine, this will mean supporting independent civil society and media organisations whose operations have been destroyed, as well as continuing to advocate for free speech and the promotion of democratic values.

In response to funding constraints, the government, along with international organisations and CSOs, implements media development programs that offer training, resources, and funding to journalists and media outlets, which are essential for improving journalistic standards and facilitating investigative journalism. Specialised programs also support regional and local media by providing financial assistance, grants, and capacity-building initiatives to strengthen community journalism and promote diversity and plurality.

A considerable part of Ukrainian media has also been heavily dependent on foreign funding. Indeed, most projects in this space were made possible due to the support of international donors; a review conducted by the Ukraine Institute of Media and Communication found that none of the projects assessed received funding from Ukrainian non-media businesses (Ukrainian Institute of Media and Communication, 2024[55]). Media, especially regional, cannot afford to invest financial and personnel resources in the production of content that does not bring profit. Recent changes in financial support by foreign governments will have a considerable impact on Ukraine media outlets, and the biggest impact of the decrease of foreign funding will likely be felt by regional, local, and investigative media (IMI, 2025[56]).

In addition to the threat to the information environment, there are specific concerns that Russia will seek to exploit emerging gaps in Ukraine's information space created by foreign funding cuts. With far fewer credible sources able to report on local news stories across Ukraine, there are concerns that inauthentic and misleading content spread by Russia will become more difficult to counter (Tahir, 2025[57]).

Beyond funding issues, Ukraine has implemented several policy initiatives focused on the media sector. For example, at the end of 2022, the new Law on Media (Verkhovna Rada of Ukraine, 2025[37]) was prepared to align Ukraine more closely with the EU's Audiovisual Media Services Directive (AVMSD). It

introduced considerable changes in the existing media regulatory landscape, including giving new powers to the National Council of Television and Radio Broadcasting of Ukraine, which now has the mandate to regulate most media sources, including online sources.

The Law on Media also establishes a system of voluntary registration, which affords registered outlets more protections, for example receiving media status and enabling journalists to be accredited, which grants them access to state institutions. It is not mandatory for online media to register as such with the government, although the law is not limited by how media is disseminated so they are able to do so should they choose. Notably, most of the key online sites have registered (Freedom House, 2024[36]). As for influencers, there are no mandatory registration processes, and the law allows the National Council to ban unregistered entities from operating in the online media sphere, with subsequent notification of the Communications Services Regulator.

In an effort to provide consistent news coverage during the war, the Ukrainian government created the United News TV Marathon shortly following the outset of the full-scale aggression in 2022. Ukraine's President signed a decree on 18 March requiring all national TV channels to broadcast through one platform, for which the government would provide funding. In 2025, the budget for the United News TV Marathon is UAH 738 million (EUR 15 million) (Verkhovna Rada of Ukraine, 2024[46]), though the Marathon has continued to lose viewership, with only 26% of the population watching in 2025, down from 47% in 2024 and from 54% in 2023 (Detector Media, 2025[58]). Only 32% believed the Marathon should continue until the end of the war, with 10% supporting its continuation post-war (Internews network, 2024[18]). Another opinion poll in September 2024 showed that 51% of respondents agree (35% strongly, 16% somewhat) that the Marathon has lost its relevance (CHESNO Movement, 2024[59]). Nevertheless, as of September 2025, 86% of Ukrainians are aware of the marathon; 42% of the population watches weekly, and 53% watch at least several times a month, up six percentage points from the previous year (Internews Ukraine, 2025[60]).

These findings reflect the larger concerns raised by the continuation of the United News TV Marathon. Given the government's oversight and funding of the TV Marathon, questions have been raised as to whether it is the best platform for enabling a free exchange of views among Ukrainians (European Commission, 2024[34]), and it has been criticised for potential impact of freedom of speech, inefficient use of financial resources, and potentially having a negative impact on the trust of Ukraine population and of government institutions when quality coverage from both public and private Ukrainian broadcasters is already available. The United News TV Marathon also risks limiting the plurality of voices on national television and increases the risk that editorial decisions will reflect political considerations.

The European Commission called for a reassessment of whether this is the best platform for enabling a free exchange of views among Ukrainians (European Commission, 2024[34]). In May 2024, the United News TV Marathon was partially reshaped, providing more autonomy for Suspilne and enabling it to launch its own round-the-clock broadcasting.

On 26 June 2024, the government adopted the roadmap to support the re-establishment of a pluralistic, transparent, and independent media space after the end of martial law, following consultations with civil society. The roadmap provides a thorough concept for the post-war recovery of the media landscape, access to public information and measures to combat disinformation (European Commission, 2024[34]). Efforts such as these will be essential as the country takes steps to ensure it prepares for the post-war context even while fighting the war.

3.3. Reinforcing institutional architecture to build information integrity

Governments are adapting their institutions and policy frameworks to respond to foreign information manipulation and interference (FIMI) threats and to create an enabling environment for accurate, reliable,

and plural information to thrive. The objective for governments is to identify policy measures that reinforce information integrity, while avoiding actions that lead to greater information control over the information ecosystem (OECD, 2024[13]). In Ukraine, the effort to continue the reform process undertaken since 2014 while responding to the urgent threats posed by the ongoing war have acted as a catalyst for the government to put in place the institutional architecture – including strategic and planning documents, offices and units tasked with responding to the threats identified, and efforts to strengthen institutional capacity – to respond in a co-ordinated and comprehensive way.

Adding measurement components to strategic and planning documents can help the government reinforce information integrity and strengthen transparency

As part of governments' efforts to put in place the institutional support needed to help reinforce information integrity, strategic frameworks play a critical role in supporting a coherent vision and effective response. National strategies can provide clarity by establishing institutional responsibilities, preventing duplication of efforts, and helping avoid information asymmetries across government (OECD, 2024[13]). That said, a strategy document is not an end in itself, but a means to guide the design of policy measures and evaluation timeframes to assess the efficiency and progress of the policies implemented (OECD, 2020[61]).

Strategies often cover operational aspects, such as designating focal points and identifying the functions of co-ordination mechanism(s), as well as set time frames to ensure the efficient implementation and evaluation of progress (see Box 3.4 for an overview of the Netherlands' national strategy). Beyond national strategies, and particularly due to the multifaceted nature of this phenomenon, guidance on responding to hostile information threats and reinforcing information integrity is in many countries included as part of other national strategic documents. This is the case in Australia, Colombia, Costa Rica, Estonia, France, Finland, Germany, Luxembourg, and the Slovak Republic.

Box 3.4. The Netherlands' government-wide strategy for tackling disinformation

In December 2022, the Dutch Ministry of the Interior and Kingdom Relations, Ministry of Justice and Security, and Ministry of Education, Culture and Science presented to the House of Representatives a renewed government-wide strategy to protect the free and open public debate against disinformation.

In the document, they present their national strategy as an effective approach to tackling disinformation centred on the values and fundamental rights of the rule of law, such as the freedom of speech and press. An important point of the Netherlands' strategy is that they highlight that qualifying disinformation as such and conducting fact-checking are not primary duties for the government. The document does note, however, that where national security, public health, or social and/or economic stability are at stake, the government can act and debunk false and misleading information.

The strategy outlines that the Minister of the Interior and Kingdom Relations has a co-ordinating responsibility for the policy against disinformation and acts as the primary point of contact within the national government and toward municipal and provincial authorities. The ministry is to conduct this role by promoting collaboration between authorities in this area and by fulfilling a knowledge function. The strategy also emphasises the need for international co-ordination mechanisms, the European Rapid Alert System, the Hybrid Centre of Excellence and the NATO StratCom Centre of Excellence and international fora such as the European Union, G7, and the OECD. This strategy updates the first government-wide disinformation policy presented in 2019 (Parliamentary Documents II 2019/2020, 30821, no. 91).

Source: (Government of the Netherlands, 2023[62]), (OECD, 2024[13])

The OECD Recommendation on Information Integrity noted the value that developing and implementing a national strategy can have as a means of supporting a coherent vision and a comprehensive approach to reinforcing information integrity and upholding universal human rights. Whether focused specifically on information integrity or included as part of other official documents such as strategies on digitalisation, democracy, trust, national security, public communication, or education, the Recommendation highlights the importance of describing objectives, time frames, scope, and operational aspects of governments' efforts in this space. The OECD Recommendation also stresses the importance of monitoring a strategy's implementation by collecting credible and relevant evidence and providing recommendations for their improvement, with particular attention paid to upholding human rights and fundamental freedoms (OECD, 2024[1]).

In Ukraine, the President signed the new "Information Security Strategy" in 2021 (The Presidential Office of Ukraine, 2021[63]), which replaced the 2016 "Information Security Doctrine". The 2021 strategy addresses the threats from Russian disinformation and propaganda and outlines measures to protect national sovereignty, territorial integrity, and democratic stability.

The "Implementation Plan of Information Security Strategy until 2025" was subsequently drafted and approved by the Cabinet of Ministers of Ukraine on 30 March 2023 to provide specific implementing actions for the Strategy (Order Number 272-r) (Verkhovna Rada of Ukraine, 2023[64]). The document outlines strategic measures designed to ensure information security in Ukraine, aiming to counteract disinformation, enhance information literacy, foster national identity, promote Ukrainian culture, protect human rights and freedoms, and reintegrate temporarily occupied territories into the national information space.

The implementation plan is structured around several strategic goals, each having specific tasks, responsible entities, execution timelines, and performance indicators. The plan also allocates responsibility among multiple governmental bodies, including the MCSC, Ministry of Defence, Ministry of Foreign Affairs, National Council for Television and Radio Broadcasting, Security Service of Ukraine, and other central executive bodies.

Ukraine's strategy takes a broad, proactive approach to defending the country's information space and building national resilience. It focuses on identifying and stopping hostile information threats early, working with international partners, and tightening laws against harmful propaganda. At the same time, it boosts the defence forces' ability to respond to information threats with better training and resources. It also puts a strong emphasis on protecting Ukraine's online space, promoting national culture and identity, and keeping people in temporarily occupied territories connected with accurate historical narratives. Clear and unified communication during crises, international campaigns to strengthen Ukraine's image, and efforts to build media literacy across society are all key parts of the strategy. Protecting journalists and supporting free expression complement the strategy's objectives to create a united, informed, and resilient population in Ukraine.

The Ministry of Culture and Strategic Communication, in co-operation with other institutions, is working on a new Information Security Strategy, scheduled for release by the end of 2025. The updated strategy will have additional elements pertaining to foreign information interference and media literacy with a focus on resilience of society and individuals. The strategy is being developed with input from multiple stakeholders, including government, academia, civil society, and other experts.

Moving forward, it may be useful to use documents such as the strategy and implementation plan to create clearer definitions of important terms, such as "disinformation", "information manipulation", and "artificial amplification". Clear definitions will help avoid internal confusion, structure engagement with platforms, and provide legal clarity in administrative or criminal proceedings.

The Ukrainian government has not yet published any public reports on the implementation of the plan, and while the plan provides a comprehensive overview of how to implement the strategy, it would be useful moving forward to clarify indicators for success. Measures of success would be useful in evaluating the

strategy document and would enable monitoring of its implementation by collecting credible and relevant evidence and indicate areas for improvement. Along those lines, the government should consider recent developments in the information space regarding both the threats it faces and its experience gained since the start of Russia's war of aggression, as well as to provide more detailed descriptions of the functions of the different Ukrainian government institutions involved in the strengthening of the information integrity as it updates its strategic approach.

Reducing fragmentation of the government's institutional responses

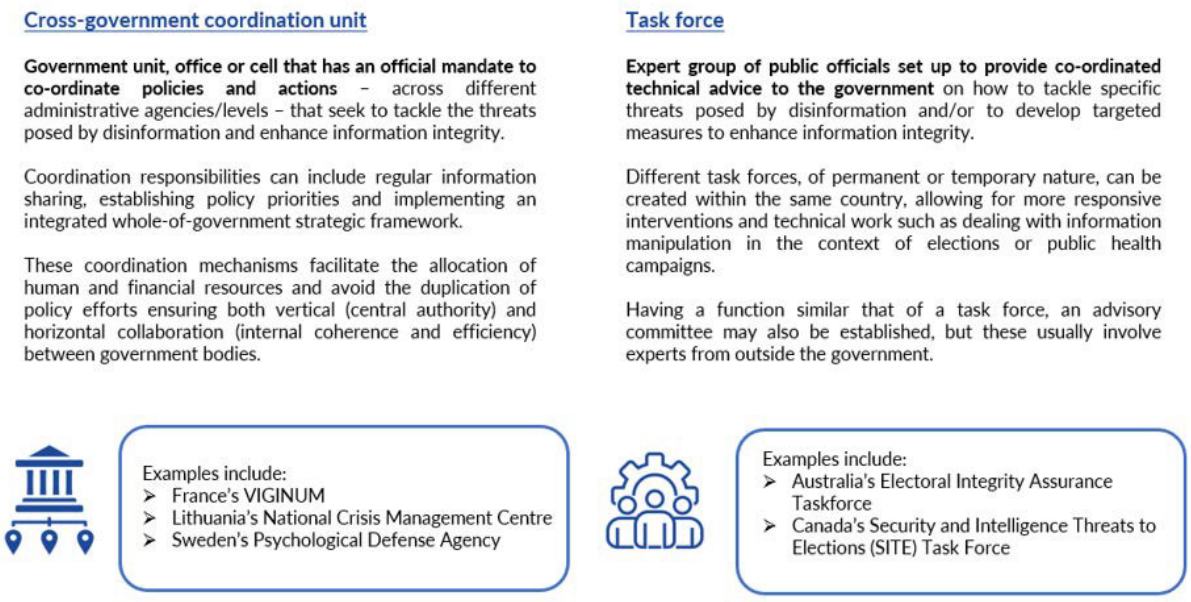
A multifaceted challenge like reinforcing information integrity involves multiple actors and approaches and should be addressed in a co-ordinated and strategic manner. The scale and speed of the proliferation of false and misleading content has made countries aware of the need to develop a comprehensive view of how to improve the level of integrity in the information space. To this end, governments are increasingly setting up or upgrading their co-ordination mechanisms (OECD, 2024[13]).

The OECD Recommendation on Information Integrity recommends that countries develop and upgrade their institutional architecture to strengthen information integrity. Notably, this can be achieved by providing clear and transparent mandates to the relevant agencies, offices, units, or co-ordination mechanisms and connecting sectoral priorities to enable information-sharing and avoid duplication of efforts. Appropriate institutional architecture also requires well-defined internal governance mechanisms with appropriate checks and balances to enable timely and effective responses to information integrity risks during crises, including, as appropriate, dialogue mechanisms with other sector actors and civil society (OECD, 2024[1]).

The Recommendation also points to the importance of governments putting in place transparent and clear processes for engaging with online platforms as well as guidelines and oversight mechanisms with robust reporting mechanisms to help protect privacy, national security, and freedom of opinion and expression. These recommendations aim to create predictable guidelines for public officials' interactions with online platforms, civil society, and academia, ensuring accountability while upholding freedom of speech (OECD, 2024[1]).

Governments are increasingly setting up or upgrading their co-ordination mechanisms (OECD, 2024[13]). Co-ordination mechanisms vary widely and can consist of central offices or inter-agency task forces composed of public servants from across the government. The latter generally have focused mandates and scope (OECD, 2024[13]) (see Figure 3.1). For example, several countries have put in place national-level co-ordination bodies that focus on detecting and characterising hostile information operations orchestrated by foreign agents, including France's Service for Vigilance and Protection against Foreign Digital Interference (VIGINUM) (see Box 3.5).

Figure 3.1 Government co-ordination mechanisms to build information integrity



Source: (OECD, 2024[13])

Box 3.5 The Service for Vigilance and Protection against Foreign Digital Interference – France

In February 2026, France has adopted its first national strategy to combat information manipulation. This document sets out a clear ambition, structured around four pillars:

- to mobilise the Nation in strengthening the resilience of democracy;
- to engage online platforms and artificial intelligence services in safeguarding public debate;
- to consolidate our national capabilities for detecting, attributing and responding to foreign digital interference;
- and to act alongside European and international counterparts to ensure a free, open and secure information space.

Under the authority of the Prime Minister, the General Secretariat for Defence and National Security (SGDSN) coordinates this strategy, drawing in particular on the Service for Vigilance and Protection against Foreign Digital Interference (VIGINUM), created by the Decree no. 2021-922 of 13 July 2021 (updated by the Decree no. 2026-70 of 11 February 2026).

VIGINUM's main mission consists in detecting, analysing and documenting, through the analysis of publicly available online content, foreign digital interferences, a form of information manipulation campaigns that relies on four criteria provided by decree:

- the implication of a foreign State or non-State actor;
- the use of inauthentic means;
- the use of inaccurate or misleading content;
- an impact on France's fundamental interests.

VIGINUM also supports the SGDSN in co-ordinating an inter-ministerial network composed of administrations and services contributing directly or indirectly to the fight against foreign digital interferences: the Ministry of Europe and Foreign Affairs, the Ministry of the Interior and the Ministry of the Armed Forces. It is notable within this network that response options are discussed and proposed on a case-by-case basis to the political level.

In close coordination with the Ministry of Europe and Foreign Affairs, VIGINUM is also contributing to the international co-operation on the fight against information manipulation, both at the European and the international levels, through several bilateral and multilateral exchanges, such as the G7 Rapid Response Mechanism and the OECD.

Since 11 February 2026, VIGINUM consolidated its leading role at the national level with three new missions: raise awareness among the general public, through the creation of an Academy for the fight against foreign information manipulation, document and conduct foresight analysis of foreign digital interferences (FDI) and develop innovative tools and methodologies useful in this field.

A fundamental element of VIGINUM is that it operates within a rigorous legal and ethical framework, notably defined by the Decree no. 2021-1587 of 7 December 2021. The latter is the result of consultations with parliamentary representatives and legal work with the French Council of State, based on its authorisation to consult, collect, and use, in an automated way, personal data publicly available online. The control of the management of the personal data collected online is supervised by the CNIL (the French National Commission for Information Technology and Civil Liberties). In addition, an ethical and scientific committee attached to the SGDSN has been set up to follow VIGINUM's activities. A representative of the highest French administrative court (the French Council of State) chairs the committee, which brings together qualified representatives from the fields of diplomacy, law enforcement, science, and media.

Source: (SGDNS, 2022[65]); (OECD, 2024[13])

Ukrainian institutions focused on reinforcing information integrity

Within Ukraine, various ministries and agencies work on reinforcing information integrity. The institutional architecture in place in Ukraine has developed rapidly and offers many lessons for other actors, particularly related to the ability of the government to create and distribute official information, exchange data internally and with external partners on information threats and actors, and crisis communication. That said, co-ordination challenges between government offices and units can lead to inefficiencies and overlaps. See Box 3.6 for an overview of the relevant institutions, agencies, or offices, which are responsible for identifying, responding to, or otherwise tackling hostile information threats in Ukraine.

The 2022 invasion increased the urgency to respond to co-ordinated information attacks. The scale of the interference campaigns demanded faster and more cohesive actions across government institutions, as well as increased collaboration with international organisations and civil society. The new centres Ukraine set up to counter disinformation were in part designed to provide more structured intergovernmental co-ordination. The invasion also reiterated the importance of building on efforts made prior to 2022 to work with civil society and media partners to develop and put in place awareness raising campaigns and training to help the public identify inauthentic information and to establish clear communication channels for rapid information sharing.[4] Specifically related to strengthening information integrity, in 2021, Ukraine established two centres:

- The Center for Countering Disinformation (CCD) under the National Security and Defence Council (NSDC), and

- The Center for Strategic Communications and Information Security (CSCIS) under the Ministry of Culture and Strategic Communications.

Box 3.6. Offices and institutions in Ukraine engaged in reinforcing information integrity

- The Center for Countering Disinformation (CCD) is a working body of the National Security and Defence Council of Ukraine and focuses on monitoring and information threat analysis as well as implementing measures to counter threats to the information security of Ukraine.
- The Ministry of Culture and Strategic Communications is the main body within the central executive authority that supports the formation and implementation of public policy in the areas of culture, public communication diplomacy, media, and publishing. It also plays a significant role in co-ordinating efforts to promote information integrity, engaging both internal and international stakeholders, including collaboration with governmental entities, civil society organisations, media outlets, and international partners to develop strategies and initiatives aimed at reinforcing information integrity.
- The Center for Strategic Communications and Information Security (CSCIS) initially was created as the part of the information agency Ukrinform; since the beginning of 2025, it has become an independent agency under the Ministry of Culture and Strategic Communications.
- The Ministry of Defence co-ordinates the creation and development of strategic communications in the Ministry of Defence and the Armed Forces as a component of the national strategic communication function, and primarily focuses on supporting the sustainability and adaptability of the function to respond to challenges and threats.
- The Security Service carries out information and analytical work related to internal and external activities by state authorities and the governments of Ukraine, focusing specifically on issues related to the national security of Ukraine.

Note: This information was provided by the Government of Ukraine in response to the questions: "*Please fill out the below information for all institutions, agencies or offices that are responsible for identifying, responding to, or otherwise tackling threats of disinformation in Ukraine. If possible and relevant, please include information for offices in crisis management and response, intelligence, armed services, and law enforcement, as well as ministries focused on specific policy areas (digital, trade, cultural issues, etc.). Please also shortly describe their roles"* and *"What cross-institutional coordinating mechanisms does Ukraine have in the field of fighting disinformation and more general strengthening information integrity, working groups etc)? Which institution (if any) oversees this co-ordination? Which institutions participate in these co-ordination bodies?"*
Source: Government of Ukraine

The **Center for Countering Disinformation (CCD)** is a Ukrainian state body under the National Security and Defence Council, established in March 2021 to safeguard Ukraine's information space. The CCD co-operates with and operates as an integral part of the Ukrainian national security and defence system. Beside the publicly visible part of the work, a considerable part of its activities are classified because of the potential impact to national security.

Its primary functions include monitoring and analysing the information environment, tracking and analysing disinformation narratives and threats targeting Ukraine's national security, particularly from external actors, combating propaganda and destructive information campaigns, and preventing attempts to manipulate public opinion. The CCD provides analytical materials to the National Security and Defence Council, develops strategic communications, and participates in creating methodologies to detect manipulative content. Additionally, it promotes media literacy through educational initiatives and collaborates with civil society and international partners to enhance information security and resilience against information threats. The CCD also co-ordinates with Ukrainian ministries, security agencies, and international partners to provide analytical insights, strategic advice, and recommendations for countering disinformation.

Since Russia's war of aggression against Ukraine began in February 2022, the CCD has also conducted debunking activities on Telegram, and X (Twitter), Facebook, and other platforms. The CCD provides the Ukrainian government with an official, expert means of countering Russia's hostile information campaigns. To-date, most of its communications have focused on presenting examples of manipulated or false content, updates on military developments, and posts that aim to help build media and information literacy by explaining how information and psychological operations are developed.

The **Center for Strategic Communication and Information Security** (CSCIS), for its part, focuses more on developing information campaigns to counter external threats and information attacks from Russia. Its key functions include conducting information campaigns to raise awareness and counter hostile information threats, as well as creating messages for co-ordinated government communication and to develop narratives to counter topics that are heavily targeted by adversaries. The CSCIS also addresses specific challenges related to the information space, especially during crises or events requiring co-ordinated responses from multiple agencies. As part of its efforts, the CSCIS monitors information attacks and tracks information threats to inform their efforts to respond, put in place preventive measures, and increase public awareness. The CSCIS also helps produce public communication materials designed to counter disinformation to share through the Ministry of Foreign Affairs and embassies, military, and other offices and agencies.

Through the Annual Kyiv StratCom Forum, the CSCIS provides a public platform for discussing issues and developing solutions to reinforce information integrity. In addition, the database of Russian information attacks against Ukraine that the CSCIS publishes helps establish an online source of information to respond to information threats, inform media and information literacy activities, and strengthen the resilience of Ukrainian society by building understanding of information threats (The Centre for Strategic Communication, 2025[66]).

While there is significant complementarity between the two offices, mandates and activities can often overlap, particularly due to the primary focus on responding to the national security threats posed by the war. One such area of potential overlap is that both centres are monitoring the information space and are producing both public and classified analytical products based on their monitoring. In addition, processes for engagement with online platforms are not clearly outlined in legislation or guidance documents, and both centres have strategic communication functions, though the CCD positions itself as more national security and defence oriented. For example, the head of the CCD provides regular updates on Russian physical attacks against Ukrainian infrastructure and on Russian information operations. Both centres also organise and participate in media information literacy and awareness rising activities.

Such shared activities do not automatically imply unnecessary overlap or duplication. Indeed, such arrangements can promote resilience and enable efficiencies, particularly around tools, resources, and capacity sharing. For example, in 2021, Ukraine's National Security and Defence Council implemented a shared platform to integrate and analyse data for national security monitoring, including a system to collect information related to information integrity and hostile information threats identified by a range of state institutions. The system allowed decision makers through the National Security and Defence Council mechanism to have an overview of the developments in the state information space (National Security and Defense Council of Ukraine, 2021[67]). This system was temporarily stopped following the full-scale invasion due to operational security reasons.

Furthermore, flexible co-ordination mechanisms have been put in place. Government officials have created ad hoc working groups, which include representatives from multiple institutions, to respond to information threats and try to develop a common strategic approach. Representatives from government and civil society alike have noted that deficiencies and formal systems are often made-up for by strong personal connections across government and between government and civil society. The primary challenges with such informal arrangements are that it is harder to secure the appropriate level of representation, meeting regularity, and clarity of expected outcomes.

There are also informal and semi-formal co-ordination mechanisms organised and run via chat groups and online messaging services. Such groups can include representatives from different central and regional level governmental institutions – for example, public officials responsible for strategic communication in different institutions – as well as mixed groups including representatives from non-governmental organisations, which enable more rapid information exchange and co-ordination. That said, these mechanisms can raise concerns regarding the longer-term ability to build institutional memory and continuity as individuals change roles, as well as more broadly to transparency, oversight, and operational security.

Currently, Ukraine lacks a fully co-ordinated strategic communication system. Interviewees suggested that clearer structure and mandate for the relevant offices, or even the creation of a single centre that could manage the necessary information sharing, public communication functions, and strategic guidance, would streamline the country's ability to respond to information threats and build information integrity. Increased harmonisation of the offices' mandates would also help strengthen the financial and staffing capacity of the government's activities in this space. The nature and magnitude of the information threats reiterate the pressing need to invest in necessary human resources and technological solutions. In addition, the counter disinformation offices face considerable skill gaps – for example, identifying staff with proficient English and other languages to efficiently interact with foreign audiences, data analysts, foreign government counterparts, and platforms.

National Council of Television and Radio Broadcasting of Ukraine

Beyond the institutions dedicated specifically to countering disinformation, the National Council of Ukraine on Television and Radio Broadcasting plays a critical role in reinforcing information integrity given its mandate to oversee state policy related to television, radio, and publishing. Such independent regulatory mechanisms can play an important role in identifying and understanding systemic risks to the information space; investigating and monitoring broadcasters' and online information platforms' compliance with applicable legislation; and issuing recommendations to help broadcasters and online information platforms address potential threats (OECD, 2024[1]).

One of the strategic directions of the National Council of Ukraine on Television and Radio Broadcasting is the introduction of media support tools and the promotion of media literacy among media professionals. To this end, the National Council created a working group on media literacy, which includes experts from the national regulator and experts from Ukrainian civil society organisations, including the Ukrainian Institute of Media and Communication, the Institute for Regional Press Development, Women in Media, Social Perspective, the Media Reform Centre, the StopFake educational platform, and the Suspilnist Foundation.

The National Council of Ukraine on Television and Radio Broadcasting conducted a survey of media professionals in October 2024, and the Media Literacy Working Group published an analytical reportbased on the survey results in May 2025 (National Council on Television and Radio Broadcasting of Ukraine, 2025[68]). The National Council takes the results of the survey into account when planning its work to support the media and improve the level of media literacy of media professionals, and is currently working on developing a media guidelines manual with the assistance of the Organization for Security and Co-operation in Europe (OSCE) Support Programme for Ukraine.

Another important area of work for the National Council of Television and Radio Broadcasting of Ukraine is co-operation with European regulators. Ukraine is a member of the European Platform of Regulatory Authorities (EPRA), which includes all national broadcast regulators of the Council of Europe states and serves as a platform for international exchange. In 2024, the National Council was also invited to join the European Regulators Group for Audiovisual Media Services (ERGA) as an observer. The National Council has also signed bilateral memoranda of co-operation with several regulators and co-operates with

international partners and organisations, including the United Nations (UN), UNESCO, and the Council of Europe.

Similar to the CCD and CSIS, the National Council faces financial and human resources constraints threatening its ability to fulfil its mandate to provide independent oversight of the information space. The Law on Media (Verkhovna Rada of Ukraine, 2025[37]) states that the funding of the National Council of Ukraine on Television and Radio Broadcasting must amount to at least 0.022% of the revenues of the General Fund of the State Budget of Ukraine from the previous year. The financing for the National Council is provided as a separate line item in the State Budget, ensuring its institutional independence. In addition to the state budget, additional sources of funding include at least 4% of actual revenues from payments for the use of the radio frequency spectrum (although this provision was temporarily suspended for 2023-2025) and international technical assistance funds (Verkhovna Rada of Ukraine, 2025[37]). In 2023, due to the martial law and budget constraints caused by the war, the Ukrainian Parliament suspended the automatic budget guarantee. This means that despite a slight increase, the budget allocation for 2025 is only UAH 230,5 million (Verkhovna Rada of Ukraine, 2024[46]), amounting to roughly 40% less than the required financing.

This financial situation has made it difficult to provide competitive salaries to personnel, which is particularly relevant given the specialised nature of the required staff. The shortage of funding also affects the ability for the National Council to implement projects, such as the online system for media licensing and registration (Digital Security Lab Ukraine, 2024[69]).

The fragmented nature of institutional co-ordination in Ukraine remains a significant barrier to effective governance of information integrity. While interactions between institutions have improved, they are still inconsistent. Co-ordination gaps often result in delayed or contradictory responses to threats in the information space, weakening overall governance effectiveness.

Strengthening institutional capacities

The urgent, immediate, and rapidly evolving threats facing Ukraine's information space require the government to invest in capacity-building programs to help public officials develop skills to analyse and respond to hostile information threats. Such support could include adapted training and upskilling at all levels of government and providing adequate human, technical, and financial resources to effectively detect, monitor, and counter the spread of disinformation and other forms of information manipulation, without impinging on freedom of opinion and expression (OECD, 2024[13]). Efforts to enhance technical and professional expertise are particularly important given the rapid changes in the tools and techniques used to create and share information, particularly related to specific skills related to the use of AI.

Ukraine has provided capacity building initiatives for public officials at the central and local levels, though they currently largely cover public officials working on strategic communication, rather than to a wider cohort. Ukrainian government institutions have received considerable support from OECD member states, the EU and other international organisations, and the EU and Ukraine have expanded co-operation in countering hybrid threats (including foreign information threats). The bilateral security agreement signed on 27 June 2024 includes measures focused on countering foreign information manipulation and interference and building information resilience.

Ukraine's efforts to build the capacities of central and local level public officials in the field of information integrity are concentrated in two main workstreams. The first is on strengthening awareness and media and information literacy of public officials. Government officials and representatives of non-governmental organisations noted gaps in the awareness and skills of public officials, potentially leading to vulnerabilities to information attacks. That said, recent research does not fully support that suggestion, as it found that 89% of public sector respondents showed above-average (72%) or high (17%) media literacy, with only 11% showing below average scores. These rates are considerably higher than similar results among the

general population (18-65 years), where only 7% have high media literacy and 28% are low or below average. Furthermore, the research found that 46% of public sector respondents are highly sensitive to distorted content, compared to 31% among general population (Detector Media, 2025[70]).

Second, capacity building efforts are focused on training public officials with the skills needed to respond and engage effectively in the information space, including through strategic communication skills and crisis communication. Research shows that only 31% of respondents from the public sector attended media literacy trainings or courses. While this percentage is still higher than 7% among general population, 20% have never heard of such initiatives (Detector Media, 2025[70]).

Notably, the CSCIS has created a School for Strategic Communications and Information Security, with the support of the United Kingdom Government Communication Service and Foreign, Commonwealth, and Development Office (Center for Strategic Communication and Information Security, 2025[71]). The school's two main training programs for public officials are "Russian Disinformation and Ways to Counter It" and "Strategic Communications in Public Administration: Crisis Response Strategies." The school also published the manual "Russia's hybrid war against Ukraine: Winning on the information front", which is modelled on UK Resist 2.0 manual (Center for Strategic Communication and Information Security, 2023[72]). The school also carried out trainings focused on communication campaign planning and crisis communications for representatives of local administrations and local self-government bodies.

Between 2022 and the beginning of 2025, the school conducted 169 training sessions, reaching a total of 1,998 participants. In 2024, it also held eight regional trainings for communicators of regional military administrations (about 166 people) and ten trainings for employees responsible for communication in state bodies (more than 200 people) ((n.a.), 2025[45]). The focus on trainings at the sub-national level is particularly relevant, given that civil servants at regional and municipal levels are often susceptible to hostile information attacks and yet do not necessarily have the resources or same level of access to information compared to officials in the national administration.

In 2025, the MCSC national media literacy project 'Filter' implemented an educational project for public officials on the use of AI technologies, partnering with the Centre for Democracy and Rule of Law and supported by UNESCO and the government of Japan. In February 2025, the training programme had received 1,450 applications and had graduated 781 public officials (Filter, 2025[73]).

Participants in the trainings for public officials have reported mixed results depending on their design and quality. Some trainings that focus on practical skills and capabilities development, such as data analysis and the use of information space monitoring tools and techniques, were useful in building Ukrainian institutions' capabilities to monitor and counter information attacks. In other cases, the practical experience and skills of Ukrainian public officials was on the same level as – or even higher than – the skills of foreign experts providing the training.

Given Ukrainian institutions' long experience of being on the frontline of information attacks, there is less of a need for basic or introductory capacity building products. Ultimately, while there is constant demand from Ukrainian institutions, and particularly from CCD and CSC, for capacity building, concentrating such efforts on data analytics and AI skills for more efficient detection and countering of FIMI threats would be the priority. It is along these lines that international co-operation and support, particularly with OECD member states, could be most useful.

3.4. Strengthening societal resilience

Strengthening information integrity requires concerted efforts to build societal resilience by addressing the root causes of crises while strengthening the capacities and resources of the population to understand, resist, and recover from the challenges they face in the information space. To that end, public policies should focus on strengthening users' abilities to recognise reliable sources of information and increasing

resilience to malign interference in the information space, building bridges with communities to better understand citizens' needs and challenges in the information space, as well as expanding on existing legal frameworks and initiatives to further develop tools for governments and civil society to work together to build resilience (Council of Europe, 2023[42]).

On the individual level, strengthening societal resilience involves governments investing in digital, media, and information literacy to help people critically assess content and make informed decisions. In addition, strengthening societal resilience requires building and strengthening relationships between the government, citizens, and civil society in ways that are effective and meaningful.

Strengthening engagement between civil society, the public, and the government to build information integrity is rooted in efforts to protect and strengthen civic space, which is understood as set of legal, policy, institutional, and practical conditions necessary for non-governmental actors to access information, express themselves, associate and participate in public life. As such, these efforts ultimately foster more open, transparent, and collaborative initiatives where both individuals and institutions reinforce efforts to strengthen the information ecosystem and engage constructively within it (OECD, 2022[31]) (OECD, 2024[2]).

In this context, this chapter will review Ukraine's efforts to build public awareness and media and information literacy skills, as well as put in place opportunities to help ensure the relationship between the government and civil society is effective and meaningful and helps support information integrity.

Insufficient public awareness and media and information literacy skills

Enhancing individuals' understanding of – and skills to operate in – modern information environments is a critical component of building societal resilience. Media and information literacy is a useful tool to help build this understanding. Specifically, media and information literacy refers to a set of skills and competencies that enable citizens to critically, effectively, and responsibly access, understand, use, and engage with information and media, both online and off-line. Notably, this can include digital literacy, news literacy, media literacy, algorithm literacy, and AI literacy (OECD, 2024[1]).

These skills are particularly relevant in Ukraine's context, given the constant information attacks. Many Ukrainians are uncertain about which sources to trust, leading to scepticism and lower civic engagement. Notably, 62% of Ukrainians in a recent survey emphasised the challenges posed by disinformation (similar to the 64% in 2023) (Detector Media, 2025[58]). That said, findings in Ukraine have also shown inconsistent skills regarding media and information literacy. Detector Media found that the share of Ukrainians with above-average media literacy declined from 81% in 2022 to 72% in 2024, though still higher than in 2020 (51%). Broadly, the indicators assess Ukrainians' understanding of the media's role, their use and trust in various news sources, digital skills, awareness of artificial intelligence, and topics such as media ownership awareness, formation analysis habits, online behaviour, and the abilities to critically evaluate media content (Detector Media, 2025[58]). While the vast majority of the country has demonstrated at least basic digital literacy skills, the lowest levels of media literacy were recorded in older populations, people with lower levels of education, and less financially well-off groups of the population. These findings might be explained by population fatigue and stricter criteria by researchers for evaluation (for example, criteria for AI literacy were added in 2024). Specifically regarding AI, the Ministry of Digital Transformation's 2025 biennial nationwide digital literacy survey found that 42% of adults and 70% of teenagers already use AI tools for learning, work, or everyday tasks (Ministry of Digital Transformation, 2025[74]).

At the same time, older adults in Ukraine show adaptability in managing information during wartime. A national survey of 1,186 adults aged 60+ found that 88.5% used the internet for news and 85.1% to stay in touch with family and friends. Focus groups revealed that participants, even with minimal training, employed techniques they had learned and adapted their media routines, with 70.2% feeling confident in their abilities to distinguish accurate content (Pasitselska, 2024[75]).

The Ukrainian government has acknowledged the importance of building media and information literacy as a means of strengthening societal resilience to information integrity threats. Ukraine's Information Security Strategy of 15 October 2021 identified insufficient levels of media literacy as a main threat that can facilitate malign actors' efforts to manipulate public opinion and conduct destructive information operations, and included enhancing media literacy as one of the country's strategic goals (President of Ukraine, 2021[76]). Additionally, in November 2025, the Ministry of Digital Transformation, together with the State Service for Special Communications and Information Protection, the National Cybersecurity Coordination Center, and Better Regulation Delivery Office, presented the draft National Cyber Hygiene Strategy, which outlines how Ukraine will systematically develop a culture of safe online behaviour by 2030. Focusing on building such skills will remain a priority as the information environment continues to change based on the evolution of AI technologies. What effects these technologies have on the public's engagement and trust of content they see will need to be factored into ongoing initiatives. Considering how to employ AI technologies to upgrade both media literacy and awareness raising efforts themselves will also be an important avenue to explore.

Institutionally, MCSC serves as the main co-ordinating body for media literacy (see Box 3.7 for information on the strategy of the Ministry of Culture and Strategic Communication of Ukraine for media literacy development until 2026). In 2021, MCSS established the national media literacy project Filter, which consolidates various media literacy initiatives and provides resources and trainings for educators and others (Ministry of Culture and Strategic Communications of Ukraine, 2025[77]).

Box 3.7. The strategy of the Ministry of Culture and Strategic Communication of Ukraine for media literacy development until 2026

The Ministry of Culture and Strategic Communication approved its "Strategy for Media Literacy Development until 2026" on 24 May 2024 in response to European Union (EU) Directive 2010/13 on Audiovisual Media Services, the Law of Ukraine "On Media" (Verkhovna Rada of Ukraine, 2025[37]), and the Information Security Strategy of Ukraine (2021).

The 2021 Information Security Strategy identifies increasing the level of media literacy in society as one of its main goals. It emphasises that "Ukraine's society must be protected from the destructive influence of disinformation and manipulative information, and the media environment must be socially responsible and function stably."

The strategy proposes to highlight the following competencies that a media-literate person should possess:

- "Information and media literacy: The ability to critically evaluate content from various sources and to use media services in an ethical and responsible way.
- Resilience to information influences. Ability to fact check and use critical thinking:
- Digital literacy: Adhering to digital hygiene rules in everyday life.
- Responsible creation and dissemination of personal content."

The strategy prioritises integrating media literacy into lifelong education, targeting educators, students, older adults, and vulnerable populations, including internally displaced persons, to ensure comprehensive outreach.

Key elements of the strategy are collaboration between government institutions, civil society, media entities, and international organisations, as well as a reliance on evidence-based practices to effectively respond to evolving media landscapes and technological advancements. The strategy includes benchmarks for measuring success by emphasising increased public awareness and improved critical evaluation skills. Regular monitoring and evaluation activities will be essential to ensure continuous improvement and responsiveness to emerging challenges in the media environment.

Source: (Ministry of Culture and Strategic Communications of Ukraine, 2024[78])

One of the flagship events co-ordinated by the Filter project is the annual National Media Literacy Day, which aligns with UNESCO's Global Media and Information Literacy Week. International partners, including UNDP, UNESCO, and the Government of Japan, also support this project. Ukraine held its third National Media Literacy Test on 17 October 2024. The test involved 236,000 participants and assessed skills in media reliability, social media dynamics, ethical content interaction, fact-checking abilities, and cybersecurity awareness; at least 20 000 participants took the test from occupied territories. While participation in this activity grew more than five-fold between 2023 and 2024, only 8% of participants achieved the top status (Ministry of Culture and Strategic Communications of Ukraine, 2024[79]). In 2025, a larger share of participants in the test were aged 36 and older compared to previous years, indicating greater interest from a wider segment of the population (UNDP, 2025[80]). Notably, the national digital education platform Diia.Education offers educational materials on countering disinformation (seven modules) as well as on artificial intelligence (22 modules).

For its part, in 2023, the Center for Countering Disinformation (CCD), with support from the European Union Advisory Mission (EUAM), published the "Handbook on Countering Disinformation", which was created to help build public understanding of threats in the information space, particularly those targeting

Ukraine (Center for Countering Disinformation, 2023[26]). In addition, the Center for Strategic Communications and Information Security regularly discloses Russian hostile propaganda activities (Center for Strategic Communication and Information Security, 2025[81]). Similarly, in 2023-2024, the organisation Smart Angel, with financial support from the European Union and in co-operation with a wide range of Ukrainian government and civil society partners[5] carried out the Information and Awareness Campaign against Disinformation, which created media products with the involvement of expert organisations (Center for Strategic Communications and Information Security, 2024[82]).

In addition to government-backed efforts, media and CSOs are also actively engaged in awareness raising and media literacy strengthening initiatives. Since the beginning of Russia's full-scale aggression in 2022, Ukrainian media have significantly expanded projects focused on media literacy and information space awareness, producing videos, podcasts, articles, and educational programs. Research in 2022-2024 found 158 media projects (103 by national outlets and 55 by regional ones) focused on media literacy and countering disinformation, of which two-thirds were regular and ongoing initiatives. While most projects targeted adults through videos, articles, and podcasts, very few initiatives were designed for children, teenagers, or other vulnerable groups (Ukrainian Institute of Media and Communication, 2024[55]). More recently, Detector Media, in co-operation with UNESCO, launched the "Media Literacy is Freedom" campaign, emphasising the importance of media and information literacy and helping Ukrainians navigate the flow of information (UNESCO, n.d.[83]).

Despite these efforts, interviews with Ukrainian stakeholders from both government and civil society met during the review suggest that media literacy training programs are too fragmented and do not reach a wide enough range of the population. Given that trainings focused on raising awareness to information threats, understanding propaganda methods, and building skills to operate in the information environment are delivered by a wide range of governmental and non-governmental actors, concerns were expressed about consistency and sustainability of efforts. The fragmentation of efforts has also limited the statistics and amount of information on the extent of these activities and their impact.

In addition to media and digital literacy efforts targeting the population at large, Ukraine has also made significant progress in introducing media literacy within the education system. The implementation of media literacy is included in the state standards for primary, secondary, and higher education, which compares favourably to the OECD average, in which 54% of 15-year-old students reported that they were trained at school to recognise whether information is biased or not (OECD, 2021[84]). These figures were highest in Australia, Canada, Denmark and the United States (more than 70%) and lowest in Israel, Latvia, the Slovak Republic, Slovenia and Switzerland (less than 45%) (OECD, 2021[85]). The State Standard of Basic Secondary Education, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 898 of 30 September 2020, defines the requirements for mandatory learning outcomes and competencies of students and contains significant potential for media education (Resolution of the Cabinet of Ministers of Ukraine, 2020[86]).

Media and information literacy is not taught as separate course, but as an integrated component of the civic education courses throughout elementary and high school. Media literacy is also taught in schools as part of extracurricular activities, including through trainings delivered by civil society organisations.

For example, the Learn to Discern (L2D) program is operated by the international non-governmental organisation IREX, in collaboration with Ukraine's Ministry of Education and Science. The programme aims to equip students, teachers, and parents with critical thinking skills to identify and resist hostile propaganda and inauthentic content. Through 2024, the program had been active in 2,000 schools (about 16% of the country's schools), engaging more than 5,000 teachers (IREX, 2024[87]).

In addition to direct media literacy campaigns in schools, organisations have focused on building the capacity of teachers to implement such programs. For example, the Academy of Ukrainian press launched the Media Education and Media Literacy online platform in 2013. This is an interactive platform for exchange among media teachers that promotes transparency and information exchange in the media

education environment. The Academy, with the support of foreign donors, has published manuals for teachers on media literacy[6] (Academy of Ukrainian Press, n.d.[88]). A leading Ukrainian online education platform “Prometheus”, with the support of the Czech government, has also created the free "Media Literacy for Educators" course. This 60-hour online program is designed to enhance educators' understanding of media, protect against information threats, and enable educators to teach these skills to students. The course covers topics such as media influence, internet safety, and cyberbullying prevention, aiming to develop critical media literacy competencies among teachers, school leaders, and educational trainers (Media Literacy for Educators, 2025[89]).

The focus moving forward will be to improve the understanding of the impact of media and information literacy activities and to better co-ordinate across government and non-government actors. The MCSC’s media literacy development strategy highlights the need to create “effective tools for regular monitoring and evaluating the effectiveness of media literacy programmes to constantly improve and adapt to changing conditions” (Ministry of Culture and Strategic Communications of Ukraine, 2024[90]). Currently, the measurement of media literacy initiatives is largely based on partial information from publicly available media literacy assessments, such as Detector Media’s media literacy index. Such research does not often include data on school children, or the impact of initiatives undertaken via the school system. There is also no systemic use of measurement tools comparing results before and after media literacy courses. Indicators of media literacy initiatives often assess attendance numbers or generalised opinion polls, rather than specific analysis of the skills learned or capacities developed in the courses provided.

The efforts to understand impact and subsequently translate that into improved media and information literacy initiatives would also benefit from improved co-ordination between governmental and non-governmental institutions (International media support, 2024[91]). The MCSC’s Filter project plays a role in co-ordination, but interviewees flagged that it would be worth considering the establishment of a more formal body that could include government representatives (for example from the Ministry of Culture and Strategic Communications, Centre for Countering Disinformation, National Council for Television and Radio Broadcasting, Ministry of Education, and other institutions) and non-governmental actors working in the field, such as the Dutch Media Literacy Framework or Finland National Media Education Policy. In addition to more effective lessons sharing and measurement, more systematic co-ordination could facilitate efforts to avoid overlaps and duplication, as well as more easily identify potentially underserved populations.

Opportunities exist to help ensure the relationship between the government and civil society is constructive and helps support information integrity

Strengthening participation by and engagement with the public, civil society, and media will be essential as countries look to strengthen information integrity. A whole-of-society approach, grounded in the protection and promotion of civic space and freedom of opinion and expression, is necessary given the fundamental role that individuals and non-governmental partners have in promoting healthy information and democratic spaces (OECD, 2024[2]). Broadly, fostering an enabling environment for CSOs that facilitates their positive contribution to society through their ability to in advocate for diverse needs, provide policy expertise, monitor government actions, contribute to public debates, and deliver services. For CSOs to operate effectively, the legal environment governing their activities is particularly important (OECD, 2024[2]). Specifically related to the information space, the OECD Recommendation on Information Integrity recognises that building information integrity requires actors across society to act together to develop, implement, and evaluate comprehensive and evidence-based public policies in support of information integrity (OECD, 2024[1]).

Since 2014, Ukraine has developed a rich civil society landscape supporting the media sector. For example, civil society organisations (CSOs) focus on hostile information threats, conduct monitoring and debunking activities, as well as produce research and indices, such as the Freedom of Speech Barometer

developed by the Institute of Mass Information, the Ukrainian partner of Reporters without Borders.[7] Civil society has quickly responded to the Russian information threat, a testament to experience gathered since 2014. As Russia's war against Ukraine continues, maintaining the country's reform momentum since 2014 and strengthening the enabling environment in which CSOs, journalists, and watchdog organisations operate will become ever more vital for Ukraine's information environment (OECD, 2022[15]).

Civil society has emerged as an indispensable partner in upholding information integrity in Ukraine. Indeed, Ukrainian government institutions have expanded their co-operation with media and Ukrainian CSOs working on information integrity considerably since the outset of Russia's full-scale aggression. Organisations including the Institute of Mass Information and Texty have been instrumental in monitoring, reporting, and advocating transparency and accountability in media operations. Their analyses regularly highlight significant vulnerabilities, exposing attempts at information manipulation and holding media and government actors accountable. These organisations have provided evidence-based assessments and recommendations that influence policy reforms.

Three main areas of co-operation have emerged between government institutions and CSOs. The first is largely around co-operation in monitoring and responding to information space and FIMI threats. Even though many of these efforts are done in parallel and sometimes overlap – both with each other, and with efforts of Ukrainian government institutions – the wide range of actors in this space enables fast and flexible identification of, and response to, such threats (Helmus and Holynska, 2024[92]). Government institutions, notably the CCD and CSCIS, co-operate regularly with CSOs on characterising Russian information attacks by identifying the actors engaged, the technologies used, and messages and campaigns. Collaboration in monitoring the threats also facilitates engagement around joint responses to information attacks, including the creation of common strategic messages, debunking activities, and the disclosure of methods used for FIMI attacks.

A second avenue for collaboration has been around building understanding and awareness of hostile information threats. Government institutions benefit from the analytical and research work of CSOs, which can help avoid duplication of resource allocation for critical analytical and research data necessary for policy making and implementation. Such awareness raising also takes the form of specific activities, including programmes that target schools, segments of the population outside of the education system, as well as trainings for government officials in such areas as OSINT, data analytics, and improved identification of interference methodologies.

Third, civil society and media organisations inform and engage with the government on policy reforms (see Chapter 4 on public participation), for example through consulting governmental institutions on legal reforms related to information integrity, including in the development of the new Law on Media and its amendments. In 2025, government representatives and civil society organisations co-operated to publish a guide for strengthening collaboration between online platforms, media and civil society in Ukraine (see Box 3.8).

Box 3.8. Co-operation between governmental and non-governmental actors in publishing a guide for online platforms to protect the rights of Ukrainians to access information

In 2025 Ukraine published a guide, "For risk management in the context of emergencies, armed conflicts and crises," which provides recommendations for relations between online platforms, media, and civil society in Ukraine. It provides recommendations for online platforms on how to protect the rights of Ukrainian users to access information.

The document was developed by representatives of state institutions, CSOs, and the media, including the chairman of the Verkhovna Rada Committee on Freedom of Speech and the Director of the Department of Information Policy and Information Security at the MCSC. It was published by "Internews-Ukraine" and "International Media Support", with support of Government of Japan and UNESCO.

The guide includes recommendations for online platforms on how to ensure freedom of expression and opinion online, including:

- Keep content documenting war crimes.
- Ensure access to verified public information during the war in Ukraine.
- Take into account the local context.
- Co-operate more actively with local representatives to help ensure access to verified information in temporarily occupied territories.

Source: (IMS; Internews Ukraine, 2025[93])

Civil society and media organisations also participate in co-regulation taskforces, for example the newly established taskforce created by the National Council for Television and Radio Broadcasting (see Box 3.9).

Box 3.9. Co-regulation taskforces

Articles 92-93 of the Law on Media outlines the principles of co-regulation. It allows creation of the joint task forces for co-regulation of the different aspects of the media sphere. The scope of co-regulation includes setting rules for content dissemination, such as classifying content harmful to children, defining prohibited content, setting advertising standards, as well as criteria for identifying online media and thematic media services.

The five co-regulatory bodies are to cover audiovisual media services, audio media services, print media, online media, and video sharing platforms. The creation of these bodies involves forming task forces that must arrange and hold constituent general meetings between representatives of media outlets and organisation and develop draft charters for the five co-regulatory bodies.

These task-forces consist of representatives the National Council for Television and Radio Broadcasting, media and CSOs. For example, taskforce for online media includes representatives of Institute of Mass Information, Detector Media, Bukvy, Podrobnosti.ua, Espresso and others.

Source: (Verkhovna Rada of Ukraine, 2025[37]) (National Council of Television and Radio Broadcasting of Ukraine, 2023[94])

The most important sources of income for the largest CSOs working on information integrity in Ukraine, such as Detector Media, the Institute of Mass Communications (IMI), Internews-Ukraine, Texty, and Molfar are project grants from international donors. Some CSOs can complement this grant funding with voluntary donations and incomes from commercial activities, for example, consulting services or providing income-generating media products, though foreign funding remains the most important source.

Many of the co-operation engagements between governments and civil society organisations are neither formal nor systematic. They are often based on personal contacts and goodwill from both sides. On the one hand, such a set-up allows for flexible responses to information attacks and other threats to information integrity. On the other hand, a lack of oversight or systematised approach can lead to unclear rules of co-operation, a lack of transparency, and risks of overlap, where different government institutions may engage with organisations on the same topic or issue independently. Increased transparency around the engagements, activities, and purpose of the government's engagement with online platforms and CSOs can also help ensure that freedom of opinion and expression is upheld and enable external scrutiny that such actions are necessary.

To tackle these issues, the MCSC has created an Expert Group gathering representatives of the media, CSOs, academics and governmental institutions as a way to engage with non-governmental stakeholders, obtain an overview of ongoing activities and results, and discuss proposals for future co-operation. For example, the Expert Group analysed issues such as the suspension of foreign financial support to Ukrainian media and CSOs and is consulted by the Ministry for the development of the new Information Security Strategy.

While this model of interaction between governmental and non-governmental actors in the field of information integrity reflects the needs for responding to crises, building capacities rapidly, and relying on external partners for technical support in the context of the war due to the shortage of the financial and other resources, the government should consider putting in place clearer mechanisms for engagement, both to reduce threats posed by the current model and prepare for the post-war environment. As discussed further in Chapter 4, in March 2025, Ukraine's Cabinet of Ministers approved the Action Plan 2025–2026 for the implementation of the National Strategy for the Promotion of Civil Society 2021–2026. This Action Plan touches on several issues, including reducing barriers for new organisations through simplified registration processes, expanding digital access to services and participation tools and improving public consultations by developing best practice guides and training public servants (CSO Meter, 2025[95]).

Moving forward, the Government of Ukraine could focus on implementing its Action Plan, which is largely in line with OECD guidance on putting in place an enabling environment for CSOs, including establishing transparent, accessible and fair registration procedures and putting in place reporting requirements for publicly funded CSOs that are robust, but not overly burdensome (OECD, 2024[2]). Protecting and strengthening civic space in this way will be an essential step in developing and implementing comprehensive and concrete avenues for government and the civil society to work together in support of information integrity.

Sequenced recommendations for reinforcing information integrity in Ukraine

Immediate priorities to sustain resilience and coherence under current conditions

- Define the functions and co-ordination mechanisms of institutional actors working in information integrity more clearly or establish a centralised governmental agency with clear mandates to monitor information threats, develop responses, and co-ordinate actions against hostile information threats across different sectors. Such an agency could be part of the of the Office of the President or the Secretariat of the Cabinet of Ministers of Ukraine (SCMU) to ensure cross-sectoral co-ordination and strategic oversight.
- Develop unified strategic communication frameworks and formal inter-agency co-operation mechanisms based on OECD best practices. Such frameworks would help strengthen institutional responses and help to fill skills gaps by, for example, more readily identifying staff with proficient English and other languages to interact with foreign audiences, conduct data analysis, and engage with foreign government counterparts and platforms. Clarifying inter-agency co-operation could also help prevent delays or contradictory responses to threats in the information space.
- Strengthen capacity-building and scenario-based exercises to support the activities of, and capacity building efforts for, relevant officials at the national, regional, and local level to foster inter-agency understanding and effective response capabilities. Given the competencies in Ukrainian institutions in identifying and responding to information threats, capacity building efforts should focus on issues such as data analytics and AI skills to strengthen officials' ability to detect and counter FIMI threats.
- Enforce laws requiring transparency in media ownership and funding sources to mitigate undue influence from political and financial interests.
- Promote independent journalism and build on previous reforms, including maintaining independence and sustainable funding for the recently established public broadcaster Suspilne to help ensure it plays a constructive role in society, particularly through investments in professional development, digital transformation, and regional bureaus.
- Establish or appoint a government official tasked with facilitating international co-operation in the field of information integrity.

Recovery priorities to build the foundations for reconstruction

- Continue to focus on rebuilding from the war and expanding upon the country's media reforms in an effort to reinforce freedom of opinion and expression. To this end, the government can update and implement its strategy, with the active and substantive engagement of national and international civil society, to ensure the country restores rights to freedom of opinion and expression at a time when restrictions are no longer justified.
- Update the Implementation Plan of the Information Security Strategy to include methods to measure impact, including qualitative and quantitative indicators. Increase transparency and build government capacity by outlining in the Implementation Plan how the insights gained in monitoring the implementation of the Strategy feed into policy design and implementation processes.

- Develop comprehensive frameworks to guide more transparent interactions between the government, online platforms, civil society organisations, and academia, including clear selection and engagement processes, transparent information-sharing protocols, and independent oversight mechanisms. Developing transparent processes and related guidance for public officials would help increase transparency around how and under what circumstances the government shares information with external actors, help ensure freedom of expression is upheld, and strengthen accountability for actions in this space.
- Establish a formal platform or multi-stakeholder co-ordination body on information integrity (e.g., under the Filter project) to align governmental and CSO-led efforts or promote joint initiatives across ministries, CSOs, schools, and international partners to scale and target interventions more effectively. Improving co-ordination would help increase the systematisation, transparency, and regularity of interaction between governmental institutions and CSOs to co-operate in monitoring and responding to information space and FIMI threats, build understanding and awareness of hostile information threats, inform and engage with the government on policy reforms, and help strengthen media and information literacy initiatives.
- Integrate media literacy into the national curriculum and support efforts to expand media literacy offerings at colleges and universities, focused on helping students learn how to critically assess news sources, review the threats and opportunities of AI technologies, and understand digital threats.
- Explore more active employment of AI technologies to upgrade media literacy and awareness raising efforts.
- Build monitoring and impact assessment capacity to the government's media and information literacy support activities to help assess whether initiatives achieve their educational goals and objectives and identify program strengths and weaknesses.

Long-term development to consolidate reforms

- Continue to align legislative efforts in Ukraine with relevant international frameworks that promote transparency, accountability, and freedom of opinion and expression. Independent judicial and legislative oversight must be empowered to ensure adequate balance between national security needs and freedom of expression in the information space.
- Update the Information Security Strategy of 2021, informed by changes in the information space and lessons learned to-date, including those driven by the expanding use of AI and changing platform dynamics. An updated strategy could provide clearer and more transparent definitions, guidance on co-ordination between government institutions on information integrity issues, and insight on interactions between governmental and non-governmental actors working in the field of information integrity.
- Further develop international co-operation, particularly with OECD member states, for sharing best practices and technological advancements, including around international exchanges and joint initiatives to monitor and respond to cross-border hostile information campaigns.
- Build on and implement Ukraine's Action Plan 2025–2026 for the implementation of the National Strategy for the Promotion of Civil Society 2021–2026 to strengthen the enabling environment for CSOs via transparent, accessible and fair registration procedures and putting in place robust but not overly burdensome reporting requirements for publicly funded CSOs.
- Further develop co-operation mechanisms between online platforms, civil society, research and academic partners, media and journalists to provide clear processes to share analysis and

research to help avoid duplication of resource allocation for data necessary for policy making and implementation.

- Expand the availability and support the creation of age- and audience-specific media and information literacy content offered for educators, public officials, journalists, and the public to enhance individuals' understanding of – and skills to operate in – modern information environments.

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Notes

[1] Note that Ukrainian institutions often refer to these as Informational and Psychological Operations (IPSOs).

[2] See zakon.rada.gov.ua/go/1089-20 for the text of Law No. 1089-IX "On Electronic Communications" for specific language

[3] The Press Freedom Index is an annual ranking of 180 countries and territories compiled by Reporters Without Borders, used to compare the level of press freedom enjoyed by journalists and media; in 2022, Ukraine ranked 106 out of 180 countries and territories. See https://rsf.org/en/index-methodologie-2022?year=2022&data_type=general for additional information.

[4] In response to the question on the OECD questionnaire: *What are the main lessons learned for intergovernmental coordination of fighting against disinformation/strengthening information integrity both before full scale invasion and after it's beginning? What specifically changed in this regard after February 2022?*

[5] Including Ukraine's Ministry of Information Policy and Culture, Ministry of Digital Transformation, Ministry of Education and Science, Ministry of Foreign Affairs, Center for Strategic Communications and Information Security, Center for Countering Disinformation (under the National Security and Defense Council), the National Police of Ukraine (Cyber Police), the Office of the President of Ukraine; Detector Media, Vox Ukraine, Stop Fake, the Ukrainian Institute of Media and Communication, the Centre for Democracy and Rule of Law, and the National Media Literacy Project "Filter".

[6] For example, Media Literacy During War: Theory, Methodology, and Interactivity, O. Volosheniuk & V. Ivanova (Eds.), Kyiv: Academy of Ukrainian Press, Center for Free Press, 2023

[7] Other relevant Ukrainian CSOs include the Lviv Media Forum, which was founded in 2013 to develop and promote best practices in Ukraine's media environment; Detector Media (previously Telekritika), which has been monitoring television news coverage since 2003 in support of raising journalistic standards; and Ukraine World, which provides updates on anti-democracy narratives shared by Ukrainian and Russian media.

4. Citizen participation for a more resilient democracy and more effective policies in Ukraine

This chapter discusses Ukraine's citizen and stakeholder participation landscape, mapping non-electoral citizen participation practices at national, and, to some extent, local levels. It reviews relevant legal, policy and institutional frameworks in place, alongside ongoing governance reforms aimed at fostering more meaningful participation in public life. The chapter highlights Ukraine's significant efforts to strengthen citizen participation. It also identifies opportunities to streamline consultation processes, leverage reforms to adopt innovative participation practices, and build public sector capacities to deliver high-quality participation opportunities. It also discusses pathways to a more coordinated and institutionalised approach to participation in the post-war reconstruction processes, to enhance public trust in government, deliver more informed and effective policies, and foster social cohesion.

4.1. Citizen participation in Ukraine: building trust in government and delivering more effective policies in a complex context

Engaging citizens in crisis-affected situations – when adopting a context-sensitive approach and following the Do No Harm principle – can reinforce government legitimacy and strengthen the social contract (Grandvoinnet and Chasara, 2019[1]). Meaningful citizen participation can also lead to better policy outcomes and greater public acceptance, which is particularly vital in complex decision-making contexts involving significant trade-offs (Kim, Shim and Park, 2021[2]; Kostyuchenko, Reidl and Wüstenhagen, 2024[3]). Building a culture of citizen and stakeholder participation is also relevant in the long-term, as it builds citizens' trust in government and can promote a more resilient and adaptive public sector (OECD, 2024[4]; OECD, 2024[5]).

This chapter discusses citizen participation in the policy cycle in Ukraine since 1991. The first section defines key concepts, in line with the OECD Recommendation on Open Government and the OECD's wider work on citizen and stakeholder participation and deliberation. The second section discusses the enabling environment for citizen participation in Ukraine, focusing on existing legal and institutional frameworks, ongoing governance reforms, policies and strategies. This includes the adoption of the 2024 Law on Public Consultations (No. 3841-IX), – to come into effect twelve months after martial law is lifted – , amendments to the Law on Local Self-Government (No. 3703-IX) as well as progress on broader policy frameworks of relevance. This section also discusses the broader infrastructure of citizen participation, including roles and responsibilities across the public sector, and efforts to foster a culture of participation among public officials. The third section provides an overview of citizen and stakeholder participation practices in Ukraine today, including the most frequently used forms and mechanisms used, the policy stages and issues for which participation is used, and the uptake of innovative technologies. Throughout the chapter, examples from OECD countries and cases where citizen participation was leveraged in post-conflict reconstruction efforts are mentioned.

The Chapter finds that Ukraine has made significant advancements to develop a strong enabling environment for participation and implement innovative participation practices. It also recognises Ukraine's ambitious citizen participation efforts, including the development of whole of government legislation, adoption of digital participation tools, and piloting of deliberative democracy. Further, it finds that, although different regions of Ukraine will have varying capacities to implement participatory processes due to security concerns, there is scope to streamline practices and provide more opportunities for citizens to be engaged across the policy cycle to foster greater public trust in government and deliver more effective policies and services. It also highlights that the implementation of participation priorities through the National Strategy for Promoting Civil Society Development and the Open Government Partnership (OGP) Action Plans, as well as sectoral and local policies, remains fragmented. This is particularly so regarding setting clear priorities for participation reforms, standardising practices across the public administration, and reconciling different legislative requirements. It recommends that Ukraine could develop a more coordinated unified and strategic approach to the promotion of citizen participation, including through enlarging the scope of the National Strategy for Promoting Civil Society Development.

Adapting Citizen Participation in Ukraine to Sustain Democratic Resilience

Over the past three decades, Ukrainians have demonstrated a strong commitment to democratic values (Schmäing, 2023[6]; Dembitskyi, 2024[7]; Goodwin et al., 2023[8]).The desire of Ukrainians to live in a well-functioning and accountable democracy has been manifest throughout the country's post-Soviet history, including during pivotal moments including the Orange Revolution (2004) and the Revolution of Dignity, or Euromaidan Revolution (2014) (Schmäing, 2023[6]; Dembitskyi, 2024[7]; Goodwin et al., 2023[8]).

Despite periods of democratic backsliding since 1991, the country's trajectory is marked by reforms to strengthen democratic institutions and give way to more opportunities for citizen participation in the

policymaking cycle and in public decision-making. This includes for instance the 2014 decentralisation reforms – especially regarding amendments to the administrative subdivisions of Ukraine, including oblasts, raions and 'hromadas' – which were pivotal to stronger democratic institutions and the provision of more meaningful opportunities for citizens to take part in public decisions (Schmäing, 2023[6]). Such efforts are also cited as one of the driving forces behind the country's active civil society and consistently resilient and cohesive civic space in the context of the Russian invasion (Szostek and Toremark, 2025[9]).

Russia's annexation of Crimea in 2014 and full-scale invasion in 2022 have nonetheless posed substantial challenges to Ukraine's democratic governance system. Citizen participation exercises and engagement with civil society groups have largely transitioned online due to security concerns. Reduced capacities and resources in the public sector have also translated to lower capacities to implement participatory processes.

The current situation juxtaposes Ukraine's democratic aspirations and the practical challenges of maintaining citizen participation processes in a wartime context. On one hand, some have pointed to the current context as a crucial opportunity to intensify Ukraine's commitment to democratic governance and aligning with European democratic values. On the other hand, others point to practical security and capacity concerns, raising questions over the feasibility of institutional transparency under wartime conditions and capacities to drive participatory processes in a crisis period. Looking forward, the resilience of Ukraine's democratic institutions and the successful implementation of democratic reforms, including those promoting more meaningful citizen participation in public decision-making, will be critical in shaping its post-war trajectory.

Despite the ongoing war and introduction of martial law, citizen participation in Ukraine has proven to be resilient. According to data from the Secretariat of the Cabinet of Ministers (SCMU), the number of public consultation events, which dropped significantly in 2022 to 1,463 – reflecting the initial impact of Russia's full-scale aggression – rebounded in 2024 to 2,792, surpassing pre-war levels recorded in 2021 (2,780 events).[1] The Ukrainian government has also proactively adapted participatory mechanisms to wartime conditions by strengthening its digital capacities (see sections below). Cross-government efforts have also led to the development of online participation platforms, ensuring the continuation of virtual consultations on draft legislation (See Table 4.2). The number of advisory bodies has also continued to grow; by the end of 2023, 410 youth councils were established (an increase of 55 during the war), along with over 1000 councils for internally displaced persons (Ministry of Youth and Sports of Ukraine, 2024[10]; Verkhovna Rada, 2024[11]).

At the same time, the introduction of specific legal restrictions under martial law has impacted certain aspects of participation. Notably, amendments to a Resolution of the Cabinet of Ministers (No. 996 'On Ensuring Public Participation in the Formation and Implementation of State Policy') introduced two important limitations: public council members may be restricted from accessing executive body premises and involving employees in their work, and the executive body of each public council may decide to not publish all or some of the information on their activities during martial law (Cabinet of Ministers of Ukraine, 2022[12]). While these precautionary measures are in place to protect citizens from becoming targets during the war, they can also limit CSO and citizens' access to information on public council activities, including regarding their recommendations on broader participation opportunities.

At a broader level, international security imperatives pose important questions over Ukraine's ability to prioritise citizen participation exercises in the medium term. Ukraine has an increasingly depleted workforce, and foreign aid plays a significant role in sustaining core governance functions, including citizen participation (OECD, 2024[13]; IMF, 2023[14]; CEPR, 2025[15]). International organisations including the Council of Europe, the European Union, UNDEF, and the International Renaissance Foundation are playing a crucial role in funding and facilitating these participation opportunities. As global priorities shift towards security and defence spending, particularly as of February 2025, concerns arise on the sustainability of participatory mechanisms funded by international actors. These concerns raise critical

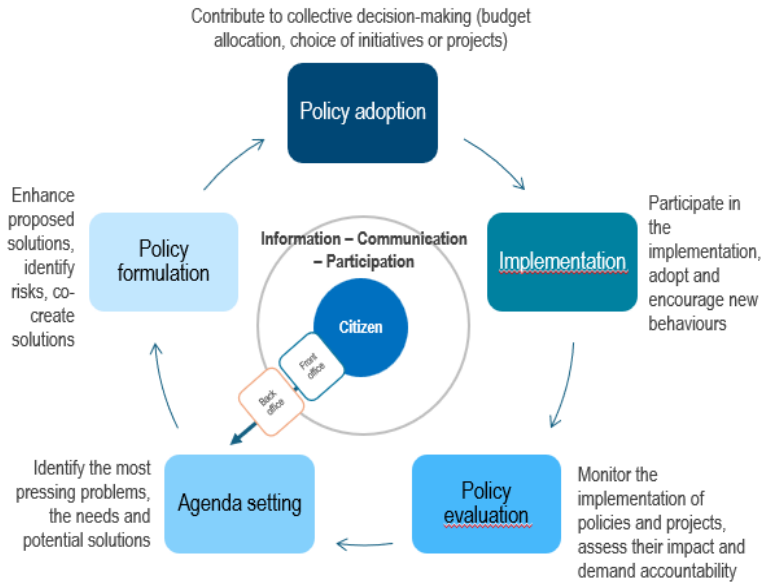
questions on how the public sector will be able to maintain and institutionalise ongoing citizen participation initiatives with reduced financial support. It also raises questions over the ability of CSOs currently receiving temporary international aid to engage in government processes in the long term. This chapter acknowledges such a context in its analysis of Ukraine's broader institutional, administrative and technical capacities to propose recommendations for strengthening the resilience and institutionalisation of participation mechanisms in Ukraine.

Promoting citizen participation for more effective polices, stronger trust in government, and more robust democratic institutions

Citizen participation throughout the policy cycle can deepen the relationship between governments and the public they serve and, when done appropriately in contexts of active conflict, can improve social cohesion, build public acceptance around difficult policy decisions, and resolve tensions between conflicting population groups (Grandvoinnet and Chasara, 2019[16]; Kostyuchenko, Reidl and Wüstenhagen, 2024[3]).

As seen in Figure 4.1 involving citizens and stakeholders throughout the whole policy cycle can enhance the impact of their contributions and ensure they can meaningfully shape policies.

Figure 4.1. Involving citizens and stakeholders throughout the policy cycle can enable them to contribute more impactfully and meaningfully



At a broader level, the OECD categorises the benefits of participation as intrinsic or instrumental (OECD, 2016[17]):

- **Intrinsic benefits** refer to the inherent values that arise from engaging citizens in democratic processes. They can include, for example, citizens' sense of political influence and sense of collective responsibility, all which influence their trust in government. Intrinsic benefits can also refer to citizens' increased political awareness and democratic values. Further, citizen participation can lead to more democratic legitimacy of decision-making processes.
- **Instrumental benefits** refer to the tangible effects or outcomes that result from involving citizens in the policy cycle. Such benefits can include improved policy effectiveness, as policies and

services are better informed by the varied needs of all population groups. Participation can also lead to greater policy efficiency, as engaging citizens early in the policy cycle can prevent costly policy failures and ensure effective resource allocation. Finally, citizen participation can ensure increased compliance by citizens, who are more likely to support policies they have helped develop.

Recent evidence shows that citizens' sense of political agency is more important to building trust in government than any other socio-economic and demographic characteristics, reiterating a well-established link between political trust and the feeling of having a say in policy decision making (OECD, 2024[4]). Comparative findings show that, after increasing trust levels following the start of the war, citizens' trust in government in Ukraine has now fallen back to lower, pre-war levels and below the OECD average (see Chapter 1). The diversification of citizen participation mechanisms beyond electoral and direct participation – including public consultations, participatory budgets, and deliberative assemblies – has been a common response across democratic governments to engage a broader set of the population, boost citizen trust and buy-in, and deliver more effective policy decisions. As seen in Table 4.2, the government in Ukraine has developed several mechanisms to enable citizens and stakeholders to be involved in the policymaking cycle.

Further, OECD findings also show growing citizen demand to be engaged in the policymaking cycle beyond elections (OECD, 2022[18]; OECD, 2024[5]) . In fact, as democracies evolve, education rates increase, and governments face growingly complex policy challenges, citizens' have higher expectations about being involved in shaping public policies and services (OECD, 2024[5]). Multiple avenues exist for citizens to be involved in public policy- and decision making in Ukraine, both through institutionalised mechanisms, including referendums, and government-issued mechanisms such as citizen assemblies and consultations, and non-institutionalised channels. To capture the breadth and depth of citizen participation in decision-making processes, the (forthcoming) OECD Citizen Participation Barometer (CPB) provides the following classification:

- Representative decision-making: Refers to the process of periodically electing representatives to take decisions on behalf of citizens. This includes, for instance, regular national elections.
- Direct decision-making: Concerns institutionalised processes by which citizens of a country register their choice or opinion on specific issues directly at the ballot box through universal and secret vote, other than through legislative and executive elections. It encompasses popular initiatives, optional and obligatory referendums, and plebiscites.2
- Participatory decision-making: Refers to non-binding participatory practices, such as online consultations, that governments employ to collect citizens inputs in the process of informing – for instance – the formulation of laws, regulations, and public budgets.
- Deliberative decision-making: Includes government-initiated processes (e.g., Citizens Assemblies) where a randomly selected group of citizens that is broadly representative of their community spends significant time learning and collaborating through facilitated deliberation to develop informed, collective recommendations for public authorities. Such recommendations are then considered during the policy formulation stage by public authorities.

This chapter focuses only on citizen and non-public stakeholder – e.g., civil society, academia, the private sector – participation in participatory and deliberative processes.

Box 4.1. OECD definitions of citizen participation

The OECD Recommendation of the Council on Open Government

The OECD Recommendation of the Council on Open Government (Hereafter the Recommendation) defines open government as "a culture of governance that promotes the principles of transparency, integrity, accountability and citizen and stakeholder participation in support of democracy and inclusive growth". In it, citizen participation is defined as "all the ways in which (citizens and) stakeholders can be involved in the policy cycle and in service design and delivery". Provision 8 and 9 of the Recommendation invites Adherents to "Grant all stakeholders equal and fair opportunities to be informed and consulted and actively engage them in all phases of the policy-cycle", and "Promote innovative ways to effectively engage with stakeholders to source ideas and co-create solutions".

Participation is a spectrum, with different levels of involvement and impact

The OECD acknowledges that participation includes a wide range of modalities and degrees of expected involvement from citizens and impact on decisions. It distinguishes between three levels of citizen and stakeholder participation:

- Information: an initial level of participation characterised by a one-way relationship in which the government produces and delivers information to the public. It covers both on-demand provision of information and "proactive" measures by the government to disseminate information. This level of participation can refer to for example, open data platforms or public communication campaigns.
- Consultation: a more advanced level of participation that entails a two-way relationship in which the public provides feedback to the government and vice-versa. It is based on the prior definition of the issue for which views are being sought and requires the provision of relevant information, in addition to feedback on the outcomes of the process. In most cases, there is no obligation to take the views of the audience into consideration when amending plans, making decisions or setting directions. In most consultation meetings, decision makers commit only to receiving the testimony of participants and considering their views in their own deliberations. Examples include public consultations on draft legislation or consultative bodies on technical questions.
- Engagement: when the public is given the opportunity and the necessary resources to collaborate during all phases of the policy-cycle and in service design and delivery. Engagement is a relationship based on a partnership between citizens and governments. The public is an active part of defining the process and content of policymaking. Like consultation, engagement is based on a two-way interaction, but acknowledges equal standing for citizens in setting the agenda, proposing policy options and shaping the decisions – although the responsibility for the final decision or policy formulation often rests on public authorities. Examples include representative deliberative processes or local participatory budgets.

For the purposes of this chapter, citizens and stakeholders are understood as:

- Citizens: individuals, and in the larger sense ' inhabitants of a particular place', which can be in reference to a village, town, city, region, state, or country depending on the context.
- Stakeholders: any interested and/or affected party, including non-government institutions and organisations from civil society, academia, the media or the private sector.

Source: (OECD, 2017[19])

4.2. Reinforcing Ukraine's enabling environment for citizen and stakeholder participation

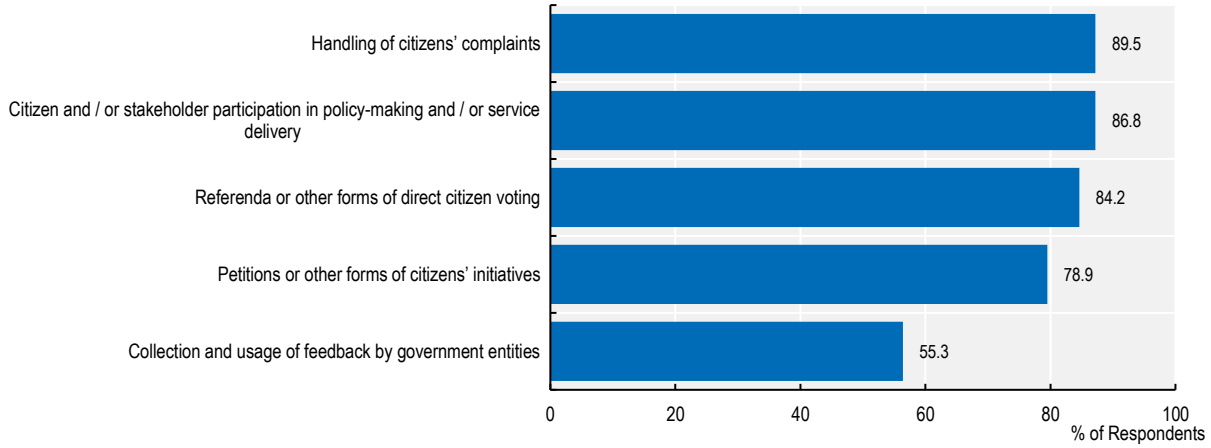
Citizen participation in Ukraine is vital not only to ensure democratic legitimacy and enable more effective policy delivery in the short term, but also to lead to more durable post-war reconstruction efforts that involve a wide range of groups in society. Citizens are experts of their own stories, needs, and cultural heritage, which is of particular importance as many heritage sites and cultural landscapes have been destroyed during the war (UNESCO, 2022[20]). Participation processes than involve a wide range of people and groups in society can enable local communities to identify and protect local markers of history, resiliency and identity, ensuring reconstruction efforts reflect local narratives (Ashworth, Graham and Tunbridge, 2007[21]). Citizen participation can also help forge a renewed narrative rooted in resilience, dignity, and unity, countering political polarisation and divisiveness (UNDP, 2022[22]). Similar lessons have emerged, for instance, from the National Conferences in several African countries in the early 1990s, where citizens' dialogues in post-conflict reconstruction efforts helped foster more democratic institutions and gave legitimacy to new political frameworks (Wing, 2008[23]). Citizen participation in Ukraine can play a comparable role, acting as a unifying force to build trust between society and the state.

To fully realise this potential, an enabling environment for citizen and stakeholder participation is essential. This requires setting the legislative, procedural, and institutional conditions for more effective and meaningful participation processes. At a broader level, it also involves promoting and protecting a thriving civic space, although this is beyond the scope of this chapter.

Strengthening the legislative basis for citizen participation in Ukraine

Legally established citizen and stakeholder participation mandates are essential to the development of participation mechanisms and to building consensus across the public administration around participation rights and obligations. They can also be powerful incentives for public institutions to engage citizens and stakeholders in the policy cycle. As seen in Figure 4.2, most OECD countries have established legislative provisions to promote citizen participation. As discussed in the following sections, Ukraine includes legislative provisions to handle citizens' complaints, engage citizens and stakeholders in policymaking and service delivery, launch referenda or other forms of direct democracy, and enable citizens and stakeholders to launch petitions.

Figure 4.2. Availability of legal provisions regarding citizen and stakeholder participation in OECD countries (2020) and Ukraine (2025)



Note: N=38. The figure represents percentages of OECD countries and Ukraine including types of legislative provisions related to citizen and stakeholder participation.
Source: 2020 OECD Survey on Open Government, authors' own for Ukraine data collected in 2024 and 2025.

In Ukraine, citizen participation is embedded in Article 38 of the Constitution, which states that "*Citizens have the right to participate in the administration of state affairs, in All-Ukrainian and local referendums, to freely elect and to be elected to bodies of state power and bodies of local self-government*". A range of laws and resolutions have been passed to enable the implementation of Article 38, institutionalising citizen participation within the Ukrainian public administration. This section analyses such normative frameworks (see Box 4.2 for an overview) as well as ongoing reforms to be implemented after the Martial law has been lifted.

Box 4.2. Normative frameworks for citizen participation in Ukraine

Constitution of Ukraine, adopted by the Verkhovna Rada on 28 June 1996

The Ukrainian constitution establishes a right for citizens to participate in the policymaking process via:

- **Article 38**: "Citizens have the right to participate in the administration of state affairs, in All-Ukrainian and local referendums, to freely elect and to be elected to bodies of state power and bodies of local self-government."
- **Article 106:** "The president of Ukraine [...] creates, within the limits of the funds envisaged in the State Budget of Ukraine, consultative, advisory and other subsidiary bodies."

Resolutions promoting citizen participation

- **Resolution of the Cabinet of Ministers, 2010, No. 996, on Ensuring Public Participation in the Formation and Implementation of State Policy:** Establishes a procedure for executive bodies at the national level to conduct public consultations to inform state policy. Following this procedure is mandatory at the national level, and recommended for local government. Further, it sets procedural requirements and methods to conducting public consultations with the wider public, including the requirement for all executive bodies to include a public consultation page in their websites. The resolution also outlines the types of policy decisions triggering mandatory consultations. It also sets a requirement for each ministry, central executive body, Council of Ministers, and local authority to establish a Public Council, formed by members of civil society organisations, to be consulted as part of the policymaking cycle
- **Resolution of the Cabinet of Ministers on Conducting Consultations of Executive Authorities with Representative Bodies of Indigenous Peoples of Ukraine, 2022, No. 1018**: Approves a procedure for conducting public consultations with representative bodies of indigenous peoples of Ukraine in the preparation of draft normative and other acts related to the rights and interests of indigenous peoples of Ukraine. Following this procedure is mandatory for executive authorities and recommended at the local government level.
- **Resolution of the Cabinet of Ministers, 2022, No. 90 on the Procedure for Conducting a Survey on Initiatives Aimed at Solving Public Administration Issues in Various Spheres of Public Life on the Unified State Web Portal of Electronic Services**: Defines a mechanism for conducting online surveys on administrative services. The resolution defines such a survey as a tool to assess public opinion on public services and policies. It states this is not a vote, election or consultation. Surveys are conducted through the Diia online portal.
- **Resolution of the Cabinet of Ministers on Approval of the Regulations of the Cabinet of Ministers of Ukraine, 2007, No. 950**: Sets a requirement for the Cabinet of Ministers to involve trade unions, and all-Ukrainian associations of employers' organisations in decision-making on issues related to the formation and implementation of state social and economic policy, regulation of labour, social, and economic relations.

- **Resolution of the Cabinet on Approval of the Procedure for Development, Public Discussion, Approval of Programmes for the Comprehensive Restoration of the Region, the Territory of the Territorial Community (Its Part) and Amendments to Them, 2022, No. 1159:** Sets a requirement to include stakeholders and the general public in programmes for the comprehensive restoration of the region through the inclusion of representatives in consultative bodies of between 5 and 21 members to advise on these programmes. It does not specify how such representatives are selected.
- **Resolution of the Cabinet On the Procedure for Publication on the Internet of Information on the Activities of Executive Authorities, 2002 No. 3:** Outlines the procedure for publishing information about the activities of executive authorities on the Internet, including by mandating regular updates of official websites and the Unified Web Portal, setting responsibilities for setting up portals (Ministry of Digital Transformation, and for monitoring activities (Ministry of Culture and Strategic Communications).
- **Resolution of the Cabinet On the formation of regional councils of entrepreneurs in the Autonomous Republic of Crimea, regions, mm. Kyiv and Sevastopol, 2011 No. 526:** Promotes the formation of regional councils composed of business associations, entrepreneurs and other relevant entities to inform state regulatory policies and entrepreneurship development.
- **Resolution of the Cabinet of Ministers On Certain Issues of Developing Regional Development Strategies and Action Plans for Their Implementation and Conducting Monitoring of Such Strategies and Action Plans, 2023 No 816:** Sets a procedure for ensuring public consultations and discussions on draft regional development strategies or action plans. To obtain the Ministry for Development of Communities and Territories' (MDCT) opinion on compliance with all requirements, the responsible entities must submit the results of the public discussion of the draft regional development strategy or its action plan.

Resolutions on social accountability mechanisms

- **Resolution of the Cabinet On Approval of the Procedure for Facilitating the Public Examination of the Activities of Executive Authorities, 2008 No. 976**: Sets a procedure for civil society organisations to take part in social accountability activities, including by conducting a public examination of the activities of executive authorities.
- **Resolution of the Cabinet On Issues of Anti-Discrimination Expertise and Public Anti-Discrimination Expertise of Draft Regulations Laws 2025, No. 322:** Sets a procedure for non-government actors, including public councils, to conduct public anti-discrimination examinations on draft laws, acts of the President, and other normative legal acts developed by executive authorities.

Laws on citizen and stakeholder participation

- **Law on Public Consultations, 2024, No. 3841-IX:** Adopted to streamline the involvement of interested parties in the process of preparing, conducting, and following up on public consultations to inform all stages of the policy cycle at a national and local level. The Law will come into effect 12 months after the termination of martial law.
- **Law on the All-Ukrainian Referendum, 2021, 1135-IX**: Defines the legal basis for the exercise of Ukrainian citizens' will through a referendum. It also sets the procedures for initiating, calling, preparing and conducting a referendum.
- **Law on Local Self-Government, 1997, No. 280/97-VR**: Sets a requirement for local authorities to consult with citizens via referendums, hearings, public consultations, and other methods as

part of the policymaking cycle. It also establishes a requirement for local level authorities to form consultative bodies composed by citizens.

- **Law On Amendments to Certain Laws of Ukraine Regarding Democracy at the Local Self-Government level, No. 3703-IX**: Introduces definitions for specific participation mechanisms and establishes the processes by which they should be conducted, including citizen conferences, public hearings, participatory budgeting, and public consultations. It also sets a requirement for the development of local-level consultative bodies conformed by citizens, and promotes youth participation. It also expanded the definition of the term "resident" to include internally displaced persons with a certificate of registration in order to enable them to take part in participation opportunities at the local level. The aim of such amendments is to promote citizens' participation rights at the local self-government level, further involve them in local self-government decisions and strengthen trust in local councils.
- **Law on the Principles of State Regulatory Policy in the Field of Economic Activity, 2004, No. 1160-IV**: Establishes the right of citizens, business entities, associations, scientific institutions and advisory bodies to participate in the development of draft regulatory acts, including by submitting proposals and taking part in consultations.
- **Law on Citizens Appeals, 1996, No. 393/96-VR**: Regulates the process by which Ukrainian citizens can submit proposals, complaints, and petitions to public authorities. A Draft Amendment to this Law was received by the Verkhovna Rada in September 2024.
- **Law on Access to Public Information, 2011, No.32939-VI**: Defines the procedure for exercising and ensuring the right of everyone to access information held by public authorities, other holders of public information as defined by this Law, and information of public interest.
- **Law On the Basic Principles of Youth Policy, 2021, No. 1414-IX**: Establishes a framework for youth policy and guarantees the participation of young people and youth organisations in the formation and implementation of that policy. It requires authorities to involve youth in decision-making on matters affecting them through for instance consultations and representation in advisory bodies such as youth councils.
- **Law about Public Associations, 2013, No. 3257-IX**: Regulates the creation, operation, and rights of public associations, including their right to submit proposals, join consultations, and contribute to drafting laws and policies through advisory bodies and mandatory consultations on key issues.
- **Law On Trade Unions, Their Rights and Guarantees of Activity, 1999 No. 1045-XVI**: Establishes the legal framework for the creation, rights, and guarantees of activity of trade unions in Ukraine, including their participation in relevant government decisions. It also obliges public authorities and employers to consult trade unions and involve them in oversight mechanisms related to employment.
- **Law About Professional Creative Workers and Creative Unions, 1997, No. 2849-IX**: Sets the legal status, organisation, state support (including registration and funding mechanisms) and rights for professional creative workers and their creative unions, including their right to participate relevant in government decisions.

Source: (Verkhovna Rada, 1996[24]); (Verkhovna Rada, 2010[25]); (Verkhovna Rada, 1997[26]); (Verkhovna Rada, 2022[27]); (Verkhovna Rada, 2022[28]); (Verkhovna Rada, 2023[29]) (Verkhovna Rada, 2024[30]); (Verkhovna Rada, 2004[31]) (Rada, 2007[32]) (Verkhovna Rada, 1996[33]) (Verkhovna Rada, 2011[34]) (Verkhovna Rada, 2025[35]; Verkhovna Rada, 1991[36]; Verkhovna Rada, 1997[37])

The main regulatory document on citizen participation at the national level – until the new Law of Ukraine 'On Public Consultations' enters into force – is Resolution No. 996 of 2010, which sets a framework for public participation to inform state policies. It also provides the SCMU with a regulatory mandate to ensure

the coordination of executive authorities in their compliance with democratic standards, including regarding their interactions with the public (Verkhovna Rada, 2020[38]).

In addition to setting broader participation requirements, Resolution No. 996 also sets a framing for strengthening public sector capacities regarding setting advisory bodies and enabling dialogue with non-government actors. For instance, it requires that each ministry, central executive body, Council of Ministers, and regional authority establish a Public Council (PC) (see Box 4.15), including members of civil society organisations, and recommends officials to meet with councils twice a year and support their continued operation. These PCs complement participation processes in Ukraine. In addition, the resolution outlines procedural requirements to plan, conduct and report on public consultations, including a requirement for each public authority to publish consultation opportunities in a dedicated page of their own official websites. It sets minimum durations for consultations and outlines the steps to plan and implement consultations. Public authorities are also recommended to prepare an annual consultations plan (referred to as indicative plan) including all planned consultation activities, to which civil society organisations can submit proposals. The Resolution also outlines consultation methods and sets mandatory requirement to consult citizens on specific public decisions. These include those related to the constitutional rights, freedoms and duties of citizens, development of policies that are of 'vital interest' to citizens – although a definition is not clarified in the text –, the preparation of strategic documents (e.g., regional programmes), and changes in the provision of administrative services. It also sets a requirement to consult citizens regarding proposed changes related to regulatory activities, legal status of public associations, benefits or restrictions to businesses and CSOs, and budget expenditure.

The Law on Public Consultations, adopted by the Verkhovna Rada in 2024 and set to come into effect twelve months after the end of martial law, represents a broader systemic change in Ukraine. Its adoption reflects an interest to both harmonise participation processes across the public administration and align with guidance from international actors including the OSCE, the OECD and the EU, which were involved its early drafting stages. See Box 4.3 for the main elements of the Law.

Box 4.3. Ukraine's Law on Public Consultations

Main components of the Law on Public Consultations of Ukraine

Defining public consultation

Articles 1 and 4 of the Law on Public Consultations formally defines the scope of public consultations and establishes principles to implement consultation exercises, including those of participation, openness, transparency, accessibility, accountability, effectiveness, and proportionality. It also provides definitions for key aspects of the participation process.

Identifying stakeholders and clarifying responsibilities within public administration

Articles 1, 2, 3 5 and 6 provide a definition for citizens and stakeholders that may be involved in participatory processes, outlining their rights to receive information, submit proposals and participate in consultations. They also clarify the public bodies that are subject to the Law, broadening the scope of Resolution No. 996 of 2010. Further, they acknowledge other regulations that are pertinent to citizen participation in Ukraine and provide clarity for which legally mandated procedure takes precedent depending on specific cases.

Setting procedural requirements and defining participation mechanisms

Articles 7 -15 codify a set of procedures or conducting public consultations and establish definitions for specific participation mechanisms, providing a legal basis for the introduction of an online platform for

public consultations. Article 16 defines the conditions where a consultation should not take place. Finally, Article 17 also lays out how public consultation should be coordinated.

Building accountability mechanisms regarding the implementation of public consultations

Articles 18 – 20 outline the consequences for not following public consultation procedures, provide guidance on reporting on public consultation results, and set a requirement for monitoring the consultations process.

Source: (Verkhovna Rada, 2024[30])

As outlined in Box 4.3, a number of mechanisms for participation are defined in the Law, including:

- Electronic Consultations: Primary and mandatory form of public consultation in Ukraine, to be conducted via a unified online platform (in development) or official websites of public authorities. Citizens and stakeholders can submit proposals, respond to questionnaires, and track consultation processes and outcomes through this mechanism.
- Targeted consultations: Optional consultations aimed at specific population groups. These consultations serve to gather expert opinions or feedback from those directly affected by a public decision. Methods to conduct these consultations can include surveys, written requests for feedback, or focus groups.
- Public discussions: Open, frequently in person or hybrid events for broader public engagement. These are typically used for decisions affecting constitutional rights or issues of significant public interest (e.g., the environment). They can take place in the form of public hearings, roundtables, conferences or townhall meetings.
- CSO consultations: This refers to engagement of CSOs who may represent collective interests or support the government to broaden participation, acting as intermediaries between the public and authorities.
- Expert consultations: In-depth consultations with subject matter experts to ensure technical soundness and feasibility of proposed policies. They may take place as closed expert panels, advisory boards, or commissioned studies.
- Consultations initiated by citizens or stakeholders: These can take place through petitions or formal requests to public authorities, who are required to respond and, where pertinent, launch a formal consultation process.
- Monitoring and feedback mechanisms: Citizens and stakeholders will be provided with dedicated opportunities to monitor how their feedback was considered as part of the preparation of post-consultation reports.

The introduction of the Law represents a significant step toward a more cohesive approach to citizen participation in Ukraine. However, its implementation will require substantial adjustments within public bodies at all levels. OECD interviewees in and outside of government emphasised the importance of using the twelve-month interim period to proactively develop tailored guidance and support materials that are adjusted to the administrative processes of each type of body mentioned in the Law. Early preparation of such guidance will be essential to enable public institutions to develop the necessary tools and expertise to implement the Law and ensure meaningful citizen and stakeholder participation. Ensuring participatory approaches are adopted at the earliest stages of ongoing reforms and decision-making processes related to the recovery process is also paramount to ensuring these are responsive and involve all relevant people and groups of society, building a case for an earlier implementation of the Law.

As part of Ukraine's Roadmap for the Functioning of Democratic Institutions, published in May 2025, the Government consolidated a working group including SCMU representatives, the Secretariat of the Human Rights Commissioner, ministerial representatives, public associations and experts, to continue revising the Law on Public Consultations under the leadership of the MoJ, ensuring alignment with OECD, EU and other international guidance, as well as addressing discrepancies with other legislative requirements in Ukraine on citizen participation. Specific tasks of the MoJ include approving methodological recommendations on the procedure for preparing an annual report on public consultations and its indicators; developing a procedure for organising public consultations by executive authorities in accordance with the requirements of the Law On Public Consultations; developing recommendations for state authorities and local self-government bodies on conducting public consultations, among other tasks. This falls within a broader remit of the working group to review and adapt, where necessary, all legislation on citizen participation in the country.

The 2025-26 Action Plan of the National Strategy for Promoting the Development of Civil Society includes a commitment to developing trainings to public officials at the executive authority level and local government on citizen participation to enable the implementation of new legal requirements and prepare relevant recommendations for policymakers (approved on March 21, 2025 No. 246) (SCMU, 2025[39]).

Setting common definitions of citizen participation in legislation

Establishing a common understanding of participatory, direct, and deliberative processes – and strategically using various forms of participation in policy documents or legal frameworks – can enhance consistency and effectiveness of participatory exercises across government (OECD, 2023[40]). Clear definitions of citizen participation can help clarify its purpose and who is or should be implicated. As outlined in several legislative provisions – including Resolution of the Cabinet of Ministers No. 996 – which provides a basis on which to define the purposes of participation in Ukraine.

Resolution No. 996 however remains unclear on what constitutes citizen participation, equating public consultations with public opinion studies prepared by academic institutions or civil society organisations. As identified by OECD interviews and broader literature on the subject, this has led to some conceptual confusion in the public administration on the core aspects of citizen participation and the importance of providing citizens with direct opportunities to be engaged in the policy cycle (Kushniriuk, 2023[41]). This is aligned with evidence collected by the OECD through qualitative interviews with government and non-government bodies in 2024, which suggests that more can be done to establish a common understanding of the definitions, rationale and purpose of participation among public officials in Ukraine. In this sense, the definition provided by the new Law on Public Consultations is pertinent and responds to a clear need.

Further, OECD interviews with policymakers in Ukraine also showed that the term citizen participation is at times used to refer to citizens' use of public or social accountability mechanisms. Social accountability focuses on ensuring the government is responsible for its actions, enabling citizens and stakeholders to question the government and to reward or sanction performance through electoral, institutional, administrative, and social channels. In contrast, citizen and stakeholder participation has the specific aim of collecting the perspectives of interested parties to inform policy decisions. In the context of Ukraine, these also differ in terms of institutional entry points: citizen and stakeholder participation is nearly always government-led, while social accountability can emerge at the initiative of citizens or civil society initiatives operating independently of formal government structures (e.g., complaints mechanisms or social audits). Both social accountability and citizen participation are core aspects of open government and democratic governance and essential for meaningful participation: effective participation can lead to stronger policy acceptance and design, and robust social accountability ensures integrity and responsiveness. However, they fulfil different functions and expose each party to different levels of risk (e.g., anticorruption whistleblowing requires stronger legal protections than participation taking place within formally sanctioned

processes) and can also result in different outcomes, so conflating the two can dilute the impact and purpose of both.

Such inconsistencies are also present across other laws and regulations outlined in Box 4.2 which, while providing a comprehensive legal framework, could further align in the definition of concepts including participation or stakeholder engagement, and promoting a unified approach to employing participation tools or practices. For example, Cabinet Resolution 2022, No. 1159 seeks to give effect to the constitutional right of *citizens "*to participate in the administration of state affairs" (Verkhovna Rada, 1996[24]) by introducing procedural mechanisms for public involvement in the preparation of programmes for the comprehensive recovery of regions and territorial communities. The Resolution requires draft programmes to be informed by a working group composed of a range of interested parties, including public authorities, associations, businesses, and others, and to be published on official websites for public proposals. It reflects a stakeholder-based model for participation, rather than a citizen's rights-based approach. While this in no way undermines the participatory intent of the instrument, the absence of a clear reference to citizens could lead, in practice, to participation being implemented mainly through intermediary groups. Addressing the discrepancy between citizen participation as a constitutional right and stakeholder consultation as an administrative tool would strengthen legal coherence and could reduce the risk that recovery planning processes rely predominantly on mediated forms of participation rather than direct citizen involvement. Further, the Resolution lacks a clear enforcement mechanism, resulting in inconsistent applications across the public sector in terms of how processes are triggered, planned, implemented, and followed up on across the public administration (Krainii, 2025[42]).

The Law on Public Consultations (See Box 4.2.) establishes the most up to date definition of public consultation in the country: "*public consultation is a stage of problem formulation, development, formation or implementation of state policy, resolution of an issue of local importance, during which the subject of public consultation collects, processes the proposals of interested parties on the subject of public consultation and publishes the results of the analysis of such proposals."* It also sets the parameters for who can participate in public consultations, including citizens, foreigners and stateless persons, non-government organisations, local government associations, business associations, and "*other persons whose rights, freedoms, interests or obligations are affected by the decision, as well as other persons who have expressed a desire to participate in public consultations*". See Box 4.3 for further analysis in this regard.

Of note, the Law exclusively provides a definition for the term *public consultation*, which does not include the broader spectrum in which citizen participation occurs (see Box 4.1 and Box 4.2). This limited scope has the potential of reinforcing existing conceptual ambiguities that are widespread among public officials. As reflected in OECD interviews with Ukrainian public officials, the concept of participation is often used to refer to cross-sectoral collaboration in the preparation of policies, consultation with local government on national-level policies, one-way communication with the broader public, and social listening. This conceptual confusion (e.g., not defining participation across a spectrum or confounding consultation of government stakeholders with citizen consultations) is evident also in other legislation (see Box 4.2).

Clarifying scope and coordinating responsibilities for participation across the public sector through legislation

As seen in previous paragraphs, Ukraine's legislation includes a broad scope of participation forms, with public consultations and participation via consultative and advisory bodies involving public representatives (e.g., public councils, councils on internally displaced persons, business councils, youth councils, etc.) being the most prevalent. Other forms of participation included (e.g., in the Law of Local Self-Government in Ukraine) such as local referenda, public hearings, citizen-led initiatives, local residents' meetings (conferences), participation of residents in planning and distributing local budget funds and public evaluation of local government activities are also featured, although they are often less widely used. In

some cases (e.g., local referenda), these are paused under martial law. Such inconsistencies between legal requirements and application may point to challenges in adopting a strategic approach to using specific forms of participation for specific purposes, which in turn can have policy implications.

Additionally, the multiplicity of legislative arrangements across policy areas has led to a proliferation of governance mechanisms (see Table 4.1 to consult citizens and stakeholders, providing an opportunity for further streamlining. OECD interviews with government representatives in Ukraine in 2024 echo this finding, pointing to the need for more cohesive legislation.

Further, OECD interviews point to gaps and overlaps in existing participation responsibilities outlined in legislation. For instance, the Law on Public Consultations does not apply to the preparation of draft regulatory acts governed by the Law of Ukraine "On the Principles of State Regulatory Policy in the Field of Economic Activity" (Verkhovna Rada, 2023[43]). While the scope and purpose of citizen and stakeholder participation under each Law is different (e.g., the latter is focused only on collecting technical, often highly specialised inputs as opposed to promoting broader democratic engagement), there is a strong case for improved coordination among the two.

For instance, participation in regulatory policy is largely limited to written comments on draft regulation and occasional public discussions, usually taking place only after Regulatory Impact Assessments (RIA) are made public. Closer alignment with the Law on Public Consultations, particularly for high-impact regulations, could enable earlier and more representative forms of participation throughout the RIA process. This would also bring Ukraine's practices closer to the OECD Recommendation on Regulatory Policy and Governance, which calls for early and representative participation (OECD, 2012[44]). Addressing discrepancies regarding consultation timeframes and which stakeholders are targeted under each case could further strengthen the transparency, accountability and effectiveness of participation processes informing regulatory policy. More can also be done to align reporting requirements on consultation outcomes (e.g., by requiring the inclusion of public consultation reports as part of RIA publications). Finally, ensuring that all draft regulatory policy documents subject to consultation are published on the centralised participation platform would promote alignment with the Law on Public Consultations and improve accessibility. Further guidance and comparative examples on embedding meaningful citizen participation in regulatory processes can be found in the 2025 OECD Regulatory Policy Outlook and the OECD Best Practice Principles for Regulatory Policy (OECD, 2025, pp. 30-37[45]) (OECD, 2020[46]).

More broadly, while defining consultation in law can help clarify a core aspect of participation, the absence of a broader implementation framework limits the governments' ability to deliver representative and context-appropriate opportunities. Establishing a formal recognition that participation exist across a spectrum (see Box 4.1 for examples on how the OECD defines the spectrum of participation) would help harmonise understandings across institutions. It would also equip policymakers with clearer guidance on which forms of participation are more appropriate for different policy contexts, levels of influence, and capacities. For instance, a more deliberative or co-creative process may be more appropriate where public trust is low or the policy issue is likely contentious, whereas a consultative approach may be sufficient for a more technical, less polarising issue. This approach would, on one hand, provide legal clarity on public authorities' obligations towards the public and, on the other, enable policymakers to develop more context-specific participation opportunities. The Actions in the 2025-26 Action Plan for the National Strategy for Promoting the Development of Civil Society partially respond to this challenge by setting a commitment to training public officials on different forms of participation, including deliberation. The contents of such trainings are not available at time of drafting.

Legislative reforms at the local level: clarifying participation requirements for local government

Decentralisation reforms in Ukraine since the 2014 Euromaidan revolution have resulted in the creation of 1 469 hromadas, the establishment of an elaborate multi-level regional development planning framework, as well as a significant increase in local public service delivery, and public funding for regional and local

development (OECD, 2022[47]). The significant expansion of local authorities' responsibilities has also increased the potential impact of citizen participation on effective decision-making and service delivery. Despite the significant challenges posed by the full-scale Russian aggression, Ukrainian authorities are committed to continuing the decentralisation process in 2025 (CoE, 2024[48]).

Building citizen participation capacities at the local level is vital to the effectiveness of decentralisation reforms in Ukraine. OECD findings from 2022, corroborated by interviews conducted in 2025 highlight growing regional economic and social disparities, fragmented local government funding and overstretched municipal staff with limited administrative and financial capacities as well as low participation expertise (OECD, 2022[47]). Resource constraints and unclear citizen participation mandates have resulted in low skills and expertise on citizen and stakeholder participation among local government officials. Further, OECD interviews show that more is needed to build, on the one hand, local officials' capacities to implement participatory processes and, on the other, citizens' awareness and skills to take part in them. Building local capacities to enable citizens to be part of the decision-making process, particularly among the most under-served regions, can be crucial to strengthen democratic values across Ukraine, counter anti-democratic influence, and ensure regional development.

In 2025, the Verkhovna Rada passed the "Amendments to Certain Laws of Ukraine Regarding Democracy at the Local Self-Government level" to align public consultation processes at the national and sub-national level (Verkhovna Rada, 2025[35]). This Law establishes formal requirements for citizen participation at the local level. It provides an expanded account of the different forms of participation that local governments can employ, and the process to implement each. It also establishes a provision for young people's and IDP participation in local government, and mandates the approval of a Municipal Charter for each territorial community, outlining specific forms and procedures for public participation. As of 2024, six pilot municipalities (Sumy, Lutsk, Brusyliv, Berdychiv, Poltava, Slavutych) enacted statutes providing a comprehensive set of norms and procedures to, among others, promote citizen participation in policymaking (Council of Europe, 2025[49]).

The 2025-26 Action Plan for the National Strategy for Promoting the Development of Civil Society in Ukraine discussed in Box 4.5 seeks to address some of the challenges discussed in this section, by identifying a set of actions to build local-level citizen participation capacities in Ukraine to fulfil legislative requirements. These include preparing recommendations on standards, good practices and methodologies for conducting public consultations and involving residents on issues of local importance and local government decisions. It also sets provisions to deliver trainings and events for representatives, local governments, and deputies of local councils on organising public consultations. In addition, the Action Plan included an item on monitoring the implementation of the Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding Democracy at the Level of Local Self-Government" and preparing relevant recommendations based on the results of such monitoring. Taking steps to enabling the implementation of legal requirements (e.g., "Law on Public Consultations" and "On Amendments to Certain Laws of Ukraine Regarding Democracy at the Level of Local Self-Government") is also mentioned in Ukraine's Roadmap for the Functioning of Democratic Institutions, and the Action Plan for the Reform of Local Self-Government and Territorial Organization of Power in Ukraine for 2024-2027.

In light of these commitments, the Ministry for Development of Communities and Territories of Ukraine (MDCT) consolidated a Working Group on the Development of Methodological Recommendations composed of public officials, academics, experts and CSO representatives. The Working Group contributed to the development of recommendations to assist local self-government bodies in the preparation of Statutes of territorial communities, or amendments to existing ones, as mandated by the aforementioned legislative updates (Government of Ukraine, 2025[50]). Such recommendations have been uploaded online to enable government officials at the local level to meet new legislative requirements.

Legal requirements are the strongest driver to implement public consultations in Ukraine

SCMU data for Q4 of 2024 shows that a significant proportion of consultations in Ukraine are related to draft legislation (of 638 consultation topics identified, 351 related to draft normative and legal acts). This reflects the extensive reforms underway as part of the EU accession process. These consultations present an opportunity to engage citizens in shaping and understanding the reform agenda, helping to generate societal buy-in and build public momentum behind the country's democratic and European integration efforts. However, OECD interviews with key government and non-government stakeholders suggest that ministries often take a formalistic approach to fulfilling consultation requirements, engaging primarily with advisory councils and experts, and limiting citizen participation opportunities downstream in the policy process, once draft decisions have been prepared and draft laws are published online.

Several regulatory and legislative arrangements in Ukraine (see Box 4.2 and Box 4.3) establish a formal requirement for policymakers to consult citizens in relation to draft laws and policy documents. In fact, of the 14 relevant public authority representatives in Ukraine interviewed by the OECD in 2024 on the topic of citizen participation, 11 referred to a law or resolution when asked about drivers for conducting consultations.

Strategic policy documents in Ukraine provide an opportunity to enable a transversal approach to citizen and stakeholder participation, and build visibility across sectors

As seen previously, participation practices in Ukraine are shaped primarily by legal requirements rather than policymakers' voluntary commitment to participatory governance. While legal mandates ensure some level of engagement, relying solely on legal compliance carries risks: participation may be superficial, irregular, or disconnected from citizens' real needs, and policymakers may view participation processes as a bureaucratic obligation rather than a tool for informed decision-making. Developing a clear policy or strategy can help address these risks by explaining the purpose of participation, linking it to long-term priorities, and encouraging policymakers to view engagement not only as a legal duty, but also as a constructive tool for building trust and improving policy outcomes.

Policy documents on citizen and stakeholder participation can play a key role when backed by political will and aligned with existing legal frameworks (e.g., strategy, roadmap, plan). They enable a more coordinated, systematic and effective approach across government by setting clear objectives, defining roles and responsibilities, and aligning practices across the public sector. Such policies or strategies can also be crucial to support the implementation of legislative or administrative reforms to work cohesively towards addressing society-wide priorities. Most (87%) OECD member countries have adopted specific policy documents to foster citizen and stakeholder participation at the national government level (see Box 4.4 for examples). Many of them have adopted of Open Government Partnership (OGP) Action Plans to outline strategic actions to achieve better outcomes on participation, although they do not provide a full picture of whole-of-government strategic directions on participation (OECD, 2023[51]).

Participation policies or strategies can also ensure that under-heard population groups are engaged in the policy process. As of 2023, most OECD countries had adopted a policy to increase the representation of specific policy groups, including young people (67% or 23 respondents), women (47% or 16), people with disabilities (35% or 12) and LGBTQI+ communities (23% or 8) (OECD, 2023[51]).

Box 4.4. National citizen participation policies and strategies across OECD countries

Finland's National Programme for the Promotion of Democracy and Participation

Finland's National Programme for the Promotion of Democracy and Participation is a cross-government strategy developed by the Ministry of Justice. It includes 15 objectives and key measures to promote democracy and citizen participation, each with clear timelines and allocation of responsibilities across government. The core aim of the Programme is to promote voter turnout and strengthen the participation of citizens in the policymaking cycle, with an emphasis on children and young people. The Programme also seeks to foster a culture of participation across government and society, as well as coordinate local-level democratic developments.

Australia's Public Service Framework for Engagement and Participation

Led by the Australian Department of Industry, Science, Energy and Resources and the Australian Public Service Commission, the Framework provides policymakers with guidance and support to enhance engagement with citizens and stakeholders. The Framework sets quality standards and principles for participation, consolidating existing guidelines and tools to plan and deliver participation activities effectively and appropriately. It also defines the different ways in which participation can take place, developing a country-specific spectrum of engagement. The Framework also self-describes as a public commitment to public service accountability and transparency. Its preparation included contributions from nearly 1,000 public officials and is intended for all public service officials at all levels, therefore promoting a culture of participation across the public sector. The development of the Framework was informed by available statistics on engagement in Australia, and delivers on commitment 5.2 of Australia's first OGP National Action Plan.

Canada's Cabinet Directive on Regulation and Associated Policies

Canada's Cabinet Directive on Regulation (the Directive) sets out the Government of Canada's expectations and requirements in the development, management, and review of federal regulations, including in relation to citizen participation. It sets the basis for coordination and co-operation across Departments and agencies when engaging with citizens and stakeholders in the context of preparing and reviewing regulation. It also is the basis for the preparation of Participation Plans in alignment with established guidance for consultation and engagement. It also promotes the use of digital tools in alignment with other existing policies, including the Policy on Communication and Federal Identity, the Policy on Privacy Protection, and the Policy on Official Languages.

Source: (Government of Australia, 2019[52]; Government of Finland, 2025[53]; Government of Canada, 2025[54])

In Ukraine, there is currently no unified policy document on citizen and stakeholder participation at the national level. Instead, two national-level policy documents provide a partial vision on strategic participation objectives; the National Strategy for Promoting Civil Society Development and the OGP Action Plan 2023-25. In addition, all government bodies are required by Resolution No. 996 to prepare yearly participation plans or 'indicative plans', which although they are not strategies, they list all the consultation activities intended for the year.

Ukraine has implemented six OGP Action Plans since becoming a member of OGP in 2011, with the latest being the OGP Action Plan 2023-25. Although these plans are not a strategy – providing a cohesive vision of open government principles for Ukraine – they are a selection of Ukraine's priorities to promote open government. While the promotion of citizen participation does not feature as a standalone commitment, it is mentioned across three of its ten commitments. These include Commitment 3 on developing public

participation mechanisms for the restoration and development of regions and communities damaged during Russia's full-scale invasion, Commitment 5 on enabling participation in Ukraine's efforts to align with EU legislation, and Commitment 6 on the development of an E-youth digital platform. The impact of these commitments on building public administrative capacities to deliver meaningful citizen participation opportunities however has been classified as 'modest' in the Independent Reporting Mechanism of the Action Plan given a lack of clear links between the actions cited in the Plan with ongoing reforms in the legislative and administrative space to strengthen citizen participation (OGP Independent Reporting Mechanism, 2024[55]).

Most OECD countries (64% of respondents to an OECD survey in 2022) have a policy or strategy in place to improve or promote an enabling environment for CSOs (OECD, 2023[51]). In Ukraine, the National Strategy for Promoting Civil Society Development 2021-26 encompasses the spirit of the state policy of 'no decisions for civil society without civil society' (Government of Ukraine, 2021[56]).

Box 4.5. National Strategy for Promoting Civil Society Development 2021-26

The preparation of this strategy involved around 200 representatives from civil society institutions and experts through a public-facing government platform, and around 300 participants through targeted meetings. Its number one strategic direction is on Ensuring effective procedures of public participation in the formation and implementation of state policy at the national and regional levels, solving issues of local importance.

The strategy acknowledges the role of civil society organisations both as enablers of citizen participation and as participants in government decisions. The tasks outlined under the strategic direction on participation are aimed at: 1) enabling civil society organisations to take part in public decisions both at the national and local level, and 2) providing a unifying framework to improve participation efforts and capacities among government and civil society organisations. Specific actions are listed regarding standardising consultation procedures, reviewing advisory councils, and enhancing legislative guarantees for peaceful assembly and strengthening participation at the local level through referenda, public hearings, advisory bodies, participation in budgetary processes, among others. Improving access to public information is also mentioned. Further, improving the All-Ukrainian Public Budget participation mechanism (see Table 4.2) also mentioned as a priority. The introduction of an online platform for interaction with executive authorities, citizens and civil society, is also mentioned, as is the development of tasks to improve government, citizens and civil society capacities to make use of participation tools. Improving the involvement of civil society in the development of regulatory acts and enabling disability advocacy organisations to take part in the policy cycle is also listed.

2025–2026 Action Plan

The 2025–2026 Action Plan for implementing Ukraine's National Strategy for Promoting the Development of Civil Society (2021–2026) sets out several key priorities on participation, including:

- Ensuring Ukrainian legislation on citizen participation at the national and local level is aligned with European and international standards.
- Strengthening the application of citizen participation practices at the national and local level, including by providing recommendations on participation standards and practices, developing methodological guidance, developing draft regulatory acts to support the implementation of legislative requirements on participation, conducting trainings, and monitoring participation practices.
- Building public councils' capacities.
- Promoting participatory budgeting in schools.

- Leveraging the use of online digital tools
- Building citizens and CSO capacities to use participation tools, including deliberative democracy, digital tools, and other participation mechanisms.
- Delivering effective civic education programmes.

Source: (Government of Ukraine, 2021[56]).

The progress review of the 2023-2024 Action Plan to support the implementation of the Strategy lists several achievements regarding participation, including the adoption of the Law on Public Consultations, as well as amendments to the existing legislations at the local level (see Box 4.2.) (Government of Ukraine, 2024[57]). Other achievements listed referred to building capacities in executive bodies to use participation tools, as well as delivering trainings for adults on civic skills. At the regional level, achievements listed included the promotion of local dialogues to inform policy and establishing dialogue platforms to enable citizens and stakeholders to inform decentralisation reform.

At the same time, there is no clear link between the promotion of citizen participation and several other achievements listed under the same priority in the review, which seem to be focused instead on promoting social cohesion. While policies that foster social cohesion and citizen participation opportunities are complementary, they serve distinct purposes. Social cohesion policies aim to foster unity and building trust and solidarity among different social groups. On the other hand, citizen and stakeholder participation is about involvement in public decision-making processes, ensuring the needs of citizens and stakeholders are reflected and policies are better informed. While participation can enhance social cohesion, and vice versa, it also aims to enhance democratic governance, effectiveness and public accountability. Conflating the two can lead to participation being seen as a tool for social unity only, rather than a mechanism to enhance citizens' impact in policy decisions. It can also lead to a tokenistic approach to participation, rather than providing meaningful opportunities to be involved in policymaking.

The Strategy's term will come to an end in 2026 and, at time of writing, an updated National Strategy for Promoting the Development of Civil Society 2027–2032 will be developed as part of the Roadmap on "Functioning Democratic Institutions". The new strategy presents a timely opportunity to place citizen participation as a core priority. While the role of CSOs remains essential, relying primarily on organised intermediaries (e.g., CSOs and Public Councils) may unintentionally limit broader public engagement, particularly among marginalised or informally organised communities. The new strategy could address this by embedding formal citizen participation mechanisms into government structures and expanding opportunities for ordinary citizens to participate. This includes integrating both the 'supply side' of participation (e.g., strengthening institutional and CSO capacities) and the 'demand side' (e.g., enabling citizens to access and have a voice on public decisions through more representative and direct mechanisms, civic education, and meaningful citizen-government interactions).

Opportunities also exist to further adapt it to the war context as well as promote a longer-term perspective to embed citizen participation in post-war reconstruction efforts. See Box 4.6 for an example.

Box 4.6. Colombia's Development Programs with Territorial Focus (*Programas de Desarrollo con Enfoque Territorial*, or PDET)

Colombia's PDET are participatory, long-term development programmes created by the government as part of its post-conflict peacebuilding strategy following the 2016 Peace Agreement. They are an ambitious government-led effort to involve citizens across 170 municipalities most affected by the conflict to promote economic development and address historical inequalities. Its aim is to rebuild the social fabric in conflict-affected territories, promote citizen-led planning, and deliver effective government services (e.g., on infrastructure, health, education). The participatory process to inform priorities included community assemblies, where over 220,000 citizens met through organised meetings to identify priorities and propose solutions. Participatory tools were also adapted to respond to indigenous language needs and involve under-heard population groups.

Source: (Rettberg, 2025[58]; Arango, 2017[59])

Finally, at the sectoral level, the Cabinet Resolution No. 996 (2010) on Ensuring Public Participation in the Formation and Implementation of State Policy requires that each ministry, other central executive bodies (e.g., agencies), and regional and Kyiv City administrations must publish online an annual plan listing all public consultations planned for the year (hereafter referred to as indicative plan) (Verkhovna Rada, 2010[25]). These indicative plans must include information on the consultation topic (e.g., specific question, project, or regulatory reform), the format (e.g., online consultation, town hall meetings), timelines, who is targeted (e.g., citizens, civil society organisations, businesses) and the responsible public officials' contact details. To prepare them, Ministries and agencies appoint one or more officials within their workforce – usually in their communications unit – to collect inputs from across their government body to be listed in the indicative plan. Such officials also liaise with civil society and relevant public councils (See Box 4.15) who are invited to provide suggestions.

Building an infrastructure for participation in Ukraine's centre of government

Responsibilities over core aspects of citizen participation in Ukraine are shared across several public entities

In Ukraine, several public entities have responsibilities over the governance of participation. This is also the case for most OECD countries, where responsibilities for citizen and stakeholder participation are decentralised and several offices share mandates (OECD, 2023[40]). Evidence collected by the OECD through interviews with public officials in Ukraine in 2024 finds that, absent a clearly defined central coordination mechanism guiding the institutional architecture for participation in Ukraine, current participation approaches remain fragmented, with varying standards and levels of commitment across ministries and local authorities. Challenges persist to developing public institutions with a role on the governance of participation (e.g., through legislation, setting good practices, developing government-wide standards and tools) which are mapped in Table 4.1. The OECD finds that more can be done to develop a co-operation model and establish a cohesive and integrated approach.

Table 4.1. Distribution of responsibilities for the governance of citizen participation across the Ukrainian public administration

Aspect of citizen and stakeholder participation	Government stakeholders and responsibilities
Proactive and reactive information disclosure	**Secretariat of the Cabinet of Ministers** • Preparation of reports on actions of executive authorities to ensure public access to information. **Ministry of Culture and Strategic Communications** • Preparation and implementation of state policy on public information. **Ministry of Digital Transformation** • Preparation and implementation of state policy on open data. **Ukrainian Parliament Commissioner for Human Rights** • Exercising oversight (including in Parliament) over legislation regarding the observance of human rights, including the right of access to information.
Public consultations	**Secretariat of the Cabinet of Ministers** • Reviewing reports on public consultation exercises led by executive authorities and preparing periodic reports which consolidate findings for the Cabinet of Ministers. • Organising trainings for public officials on public consultations. • Providing practical methodology support and advice to officials on public consultations. **State Regulatory Service** • Ensuring compliance of public authorities with consultation requirements on draft regulatory acts. **Ministry of Justice** • Preparation, review, and implementation of state laws related to public consultations.
Social accountability mechanisms (feedback on the quality of public services, citizens' complaints, etc.)	**Secretariat of the Cabinet of Ministers** • Ensuring compliance of executive authorities with the legislation on citizens' appeals. **Government Contact Centre (State institution)** • One-stop-shop to coordinate activities under the Unified System for Processing Appeals, ensuring the appeals of citizens and stakeholders are addressed by executive authorities, the SCMU, the Office of the President and state collegial bodies. **Ministry of Digital Transformation** • Managing the Diia platform which centralises public services and enables citizens to provide feedback. **Ministry of Justice** • Drafting and reviewing the Law on Citizens' Appeals. **Ukrainian Parliament Commissioner for Human Rights** • Monitors compliance with the legislation on citizens' appeals.
Digital participation	**Ministry of Digital Transformation** • Developing and monitoring cross-government citizen participation platforms and monitoring the accessibility of participation portals.
Open Government Partnership (OGP)	**Secretariat of the Cabinet of Ministers** • Developing a OGP National Action Plan, overseeing its implementation in coordination with relevant Ministries, and coordinating multilateral processes.
Interaction with civil society organizations	**Secretariat of the Cabinet of Ministers** • Development and implementation of state policy to promote the development of civil society.
Communication with public, interaction with the media	**Secretariat of the Cabinet of Ministers** • Coordination of executive authorities' compliance with public communication requirements outlined in relevant legislation. **Ministry of Culture and Strategic Communications** • Development and coordination of information campaigns on current public policy issues, and monitoring the websites of executive authorities to ensure compliance with legislation on access to information.
Capacity Building and Awareness Raising on citizen and stakeholder participation	**Secretariat of the Cabinet of Ministers** • Awareness raising on the implementation of the Open Government Partnership Initiative, public consultations, and the operation of public councils. **Ministry of Digital Transformation** • Promoting the use of e-democracy mechanisms **Higher School of Public Administration** • Trainings to civil servants on public communications and citizen and stakeholder participation, as well as provision of civic education programmes available to CSOs. **Ministry of Culture and Strategic Communications** • Trainings to civil servants on public communications, countering dis- and misinformation, and involving CSOs in information sharing.

Source: OECD Public Governance Survey to Ukraine, 2024

As seen in the above table, the governance of citizen and stakeholder participation in Ukraine is fragmented and opportunities exist to adopt a strategic approach at the government level, with responsibilities spreading across several institutions at the national and, as discussed in the following sections, local levels. While this allows for a more tailored and specialised approach – enabling institutions to develop sector-specific legislative provisions, institutional arrangements and capacity-building tools – it also presents significant challenges in terms of steering, coordination and monitoring. A lack of clear coordination mechanisms and standardised procedures has reportedly led to inconsistencies on, for instance, the development of legislative arrangements and guidelines, creating barriers to access on the citizen and stakeholder side, and effectiveness on the government side.

Coordinating citizen and stakeholder participation from the centre: the Secretariat of the Cabinet of Ministers of Ukraine

Governance arrangements for citizen and stakeholder vary across OECD countries, shaped by administrative structures and the historical trajectory of democratic reforms. OECD data from 2020 shows, however, some common trends regarding the coordination and professionalisation of responsibilities for citizen participation across government. For instance, most (81% or 30) of the 39 surveyed OECD countries have designated offices or institutions responsible for providing support to public institutions to ensure public officials have the skills to consult and engage with citizens and stakeholders. Most (67% or 25) have an office to provide technical support to public institutions on the use of digital technologies for citizen and stakeholder consultation or engagement and/or an office to strengthen relationships between government and civil society (84% or 31). Finally, 21% (eight) of respondents had dedicated staff in charge of participation in all the ministries at the central or federal level (OECD, 2023[40]). As shown in previous OECD studies, a significant barrier to more effective and meaningful participation is lack of cross-sectoral coordination, pointing to the importance of establishing a strategic view from the centre (OECD, 2024[5]).

Having a clear distribution of responsibilities can lead to a more coherent and consistent approach to the implementation of citizen participation processes across the public administration, reducing duplication of efforts and fragmentation. Embedding participation responsibilities across government structures makes its prioritisation less dependent on political cycles or other externalities, ensuring policy continuity. Clearly allocating responsibilities on participation can also enable governments to develop expertise, provide trainings, and ensure public officials develop the skills and tools needed to engage with citizens effectively.

As previously noted, the SCMU has a regulatory mandate to coordinate executive authorities' compliance with democratic standards, including regarding their interactions with the public (Verkhovna Rada, 2020[38]). Its activities serve to build citizen and stakeholder participation capacities across both front-office and back-office functions of public authorities (see Figure 4.3).

Figure 4.3. Citizen and stakeholder participation functions of the Secretariat of the Cabinet of Ministers

Front-office functions include all public-facing activities of government, including communicating with the public to raise awareness of consultation exercises, delivering participatory processes, and managing public-facing communication portals (e.g., consultation webpages) (OECD, 2024[5]). Examples of front office functions led by the SCMU include leading the work of the Coordination Council for the Implementation of the OGP Initiative (see Box 4.7) and supporting the implementation of participatory processes led by executive authorities through technical expertise. Front-office functions, particularly public communications, are crucial to enhance societal awareness of consultation processes, and can be key to fostering a whole-of-society buy in for reconstruction efforts.

Back-office functions include the internal processes of government, including drafting legislative and regulatory frameworks, developing and implementing state policy, ensuring civil servants have adequate skills and capacities, performance management and audit, and building institutional learning (OECD, 2024[5]). Examples of back office functions of the SCMU include reviewing recommendations on draft legislations on citizen and stakeholder participation (e.g., the Law on Public Consultations, which was developed by the Ministry of Justice) which are then submitted to the Cabinet of Ministers for consideration. It also oversees the compliance of executive authorities on regulatory requirements on participation, including by monitoring the publication and implementation of annual consultation plans. As part these functions, the SCMU also tracks consultation activities across all ministries, other central executive authorities (e.g., agencies) and regional and Kyiv city military administrations, and publishes quarterly reports.

Other back-office functions of the SCMU include overseeing the implementation of state policy regarding interactions with citizens and civil society (e.g., the National Strategy for Promoting Civil Society Development) via coordination meetings with executive bodies and the development of action plans. This is also the case for the implementation of the Open Government Partnership Initiative in Ukraine, where the SCMU leads the development of action plans to meet commitments, with the involvement of representatives from executive authorities and the public. The SCMU also develops trainings and guidance materials to public officials at a national level to deliver participation processes (see Box 4.9). It is expected that, once the country is no longer under martial law, the SCMU will play a coordination role to the implementation of the Law on Public Consultations.

Box 4.7. Coordination Council for the Implementation of the OGP Initiative

The Coordination Council is Ukraine's multistakeholder forum which oversees the implementation of the OGP action plan, including by considering and approving action plan proposals, monitoring their implementation, and issuing recommendations for improvement as needed. It is provided with administrative support by the Secretariat of the Cabinet of Ministers. As of 2023, it was composed of seven representatives from government bodies at a national level, including the State Secretary of the Cabinet of Ministers, the Deputy Director of the Department of Information and Public Relations of the Secretariat of the Cabinet of Ministers, the Deputy Minister of Economy, the First Deputy Minister of Digital Transformation, the Deputy Minister of Finance, the Deputy Minister of Foreign Affairs, and the Deputy Minister of Justice for Digital Affairs.

It also includes representation from international organisations, including Transparency International and International Renaissance Foundation, and civil society organisations including the Civil Society Development Forum, the Institute of Analytics and Advocacy, the Eastern Europe Foundation, and the Public Union "Legal Development Network". Civil society organisations are selected through an open competitive process.

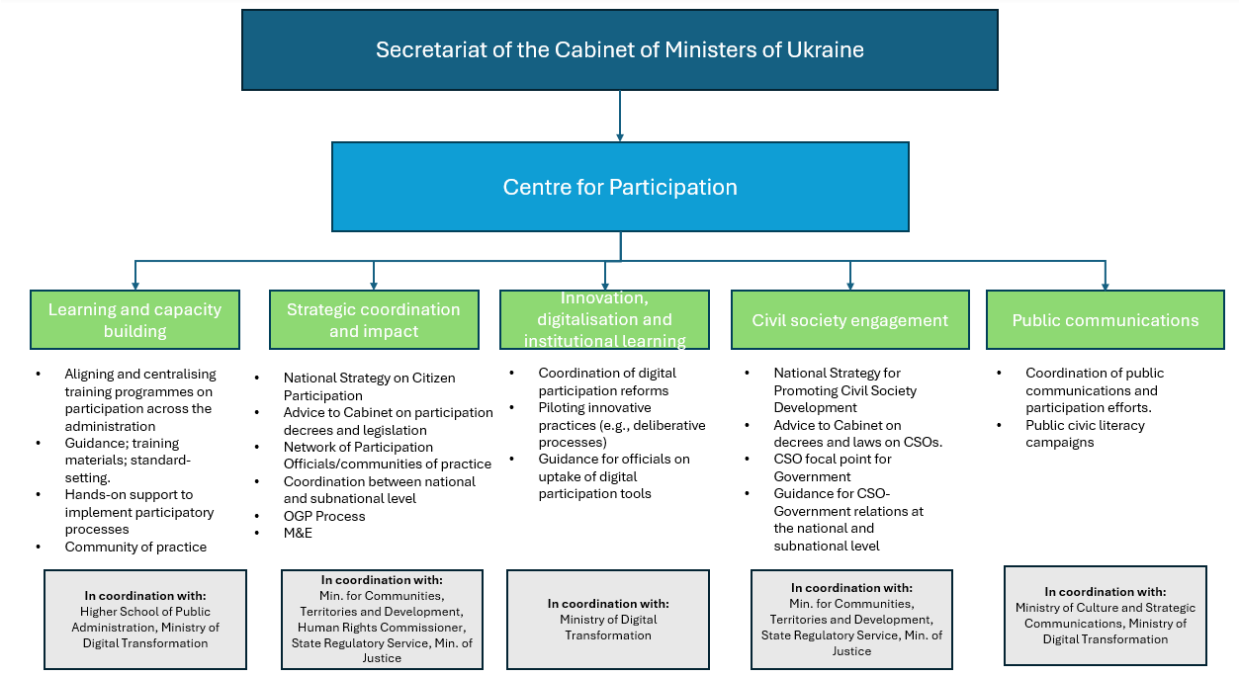
Although the Coordination Council oversees the implementation of actions under each action plan, including for instance the adoption of the Law on Public Consultations, OECD interviews with government stakeholders and international organisations showed that it could be pertinent to further engage the Council to inform the planning and implementation of broader reforms on citizen and stakeholder participation.

Source: Secretariat of the Cabinet of Ministers of Ukraine

While the SCMU is already progressing towards becoming a central hub for citizen participation, OECD interviews suggest that more can be done to clarify its role across the public sector and increase the visibility of the role of the SCMU Department of Information and Public Relations in particular across government. In addition, foreseen reforms related to the Law on Public Consultations provide an opportunity to ensure the SCMU staff is equipped with the necessary skills and capacities to promote a whole-of-government approach to the implementation of the Law.

Moving forward and on a longer-term perspective, establishing a dedicated Centre for Participation—built within the SCMU's Department of Information and Public Relations, particularly its Sub-division for Promotion of Civil Society Development and Public Interaction—could help steer the national participation agenda and ensure adherence to legislative requirements. This centre could be created either through restructuring the sub-division or as a distinct unit within it, helping to consolidate expertise, strengthen oversight, and raise the profile of participation efforts across all levels of government.

Figure 4.4. Proposed organigram for a Centre for Participation in the Secretariat of the Cabinet of Ministers of Ukraine



International examples of Centres for Participation (see Box 4.8 for instance) show that having a dedicated unit which centralises advice, coordination, capacity building, innovation and policy development on citizen participation can reduce ambiguity across public bodies on responsibilities and ensure the consistent application of participation policies. It can also promote economies of scale and reduce duplication costs. For example, in the case of Ukraine, the Centre of Participation could be featured in the centralised participation portal currently in development as a point of contact for CSOs. A formal structure can also enable the Centre to act as a hub for collaboration with other ministries and agencies, and ensures the continuity of institutional knowledge beyond changes in political leadership. According to international practices, setting up a Centre for Participation requires between 3-7 officials, which would need to be reallocated from the existing number of officials that work in the Department of Information and Public Relations, and the Sub-division for Promotion of Civil Society Development and Public Interaction.

Box 4.8. Centres of participation across OECD countries

France's Interministerial Centre for Citizen Participation (CIPC)

France's CIPC (Centre interministériel de la participation citoyenne) is part of the Inter-ministerial Directorate for Public Transformation. It provides support and guidance to ministries and state services on executing participatory projects, and oversees ensuring the quality, transparency and follow up of participatory processes. It does so by developing guides, trainings and methodological advice on participation, as well as piloting participatory processes to better tailor mechanisms and align with public expectations and objectives. The CIPC also manages a network of public agents responsible for citizen participation, which meets regularly to discuss common challenges and successes. The work of the CIPC on streamlining the procurement of digital participation platforms across the public sector has led to demonstrable fiscal savings.

New Zealand's Department of the Prime Minister and Cabinet (DPMC) Policy Project team

The New Zealand DPMC Policy Project provides policymakers with strategic and practical advice to integrate citizen participation as part of day-to-day governance processes. This includes for instance clarifying the different purposes and benefits of participation, and setting out a range of types of engagement depending on the level of participation.[3] It also centralises a range of good practice guidelines and design tools, provides information on building participatory capacities across agencies, establishes participation principles and values, issues resources on selecting participation methods, and provides guidelines to engaging with under-heard population groups. Other types of guidance are also provided, including on conducting citizen juries, building local-level capacities for participation, and engaging with Māori and Pasifika. The DPMC also created a Cross-Government Stakeholder Community of Practice for officials from all government agencies to join and learn from each other by sharing expertise and experiences.

Source: (Government of New Zealand, 2023[60]; Government of France, 2025[61])

Fostering a culture of participation across the public administration and in society

International experience shows that structured guidance and training for civil servants plays a key role in effective citizen and stakeholder participation. Almost 80% of OECD countries have developed toolkits and guidelines for civil servants regarding citizen and stakeholder participation, with 64% also offering formal trainings (OECD, 2023[40]). Although significant reforms have been undertaken to strengthen professional development in the civil service in Ukraine, the ongoing war has presented important spending cuts on public officials' trainings (OECD, 2024[62]) In this challenging context, the SCMU partnered with the High School of Public Administration (HSPA) and other educational and international institutions (e.g., universities and research institutes, OSCE, UNDP) to provide trainings and certificates to enable public officials to build their citizen and stakeholder participation skills. In addition to this, the Ministry of Digital Transformation provides more than twelve (12) education series on the Diia.Education website on participation and civic technologies.

Box 4.9. Building capacities for participation in Ukraine: Mapping available trainings and courses

Higher School of Public Administration

The Higher School of Public Administration organises trainings for public officials on competencies including management, digital skills, reform and reconstruction processes, human rights and equality, security, anticorruption, languages, and other core governance priorities as determined by the Schools' Development Strategy (See Chapter on the future of civil service for a detailed overview). Such trainings are available through a Knowledge Management Portal available for public officials. The main course offered by the Higher School to build policymakers' participation skills is entitled "Public Authority Communications for Democratic Governance". The course is offered to Category B civil servants. In 2023, 54 civil servants of category "B" completed the training. In 2024, the number increased to 343.

The course includes eight modules, of which three are focused on public communications and access to information, one on dialogue and mediation skills, and one on behavioural insights. Three modules are focused on citizen consultations in policy processes:

- Module 3) Public Consultations as a Form of Communication with the Public. The module provides an overview of general principles and regulatory frameworks for participation, including

standards set by the Council of Europe and the European Commission4. It also maps stakeholders, discusses different consultation formats (e.g., electronic consultations, world cafés), and provides information on organisational requirements for conducting consultations (e.g., information notices, reporting).

- Module 4) Other Mechanisms of Public Engagement and Cross-Sectoral Partnerships (e.g., Advisory Bodies. The module provides an overview of public and advisory bodies and their functions, as well as ways to engage non-government organisations as public experts. It also provides an overview of the State Policy in Promoting Civil Society Development and the OGP Initiative.
- Module 7) Public Consultation Workshop. This module discusses how to select a consultation format, using digital tools, as well as organising and implementing innovative approaches including world cafés and future workshops.

The HSPA has also partnered with the Hans Seidel Foundation in Ukraine to develop an online course for public officials entitled "Political Education of Civil Servants in Ukraine", including modules on political education, democratic values, the Ukrainian political system, and public participation and communication from government authorities. The OECD does not have further information on the uptake of this course.

In addition, two other programmes are run by the Higher School of Public Administration, involving representatives of the SCMU to help impart them. These include:

- Interaction with the public in public authorities, which in 2024-25 was imparted to about 1,000 civil servants, and;
- Information support and interaction with the public in public authorities, which was imparted to about 200 civil servants in the same time period.

Unified State Digital Education Web Portal 'Diia Education' Training Certificates

The Unified State Digital Education Web Portal "Diia.education", led by the Ministry of Digital Transformation, offers courses for public officials and citizens on a range of subjects, including topics such as civic service, youth work, crisis communications, and how the public service operates. As of May 31, 2025, the site had over 2.6 million users registered, and had issued 3.8 million training certificates. The Ministry reports the following uptake for relevant courses by the aforementioned date:

- "Classification of civil service positions" (39636 users)
- "State policy and how to shape it" (24353 users)
- "On democracy through action (modules 1 and 2)" (19948 users)
- "Organization of youth internships in public authorities" (41166 users)
- "How to build an effective civil organization" (2013 users).

Source: OECD interviews with government and non-government stakeholders in Ukraine; (Government of Ukraine, 2026[63])

The trainings discussed above represent a significant step towards enhancing public officials' participation capacities and awareness of relevant guidelines and statutory requirements, although their impact may be limited by low uptake. Ukrainian civil servants interviewed by the OECD reported low awareness of opportunities to be trained. While the OECD does not have available data on HSPA target percentages of public officials having completed such a training, of the 159,122 Category B public officials reportedly working for the Ukrainian Government by May 2024 (National Agency of Ukraine on Civil Service, 2024[64]), less than 0.3% had completed the HSPA "Public Authority Communications for Democratic Governance" training. At a broader level, OECD findings suggest public officials have low incentives to seek professional

development opportunities, as promotion processes are unclear (OECD, 2024[62]). At time of writing, the Government of Ukraine committed through their Roadmap to Accession to the EU to develop trainings, guidance materials and information sessions for public officials at the national and local level to strengthen capacities on participation. A number of trainings have been updated to meet legislative requirements discussed in subsequent sections. Several observations discussed below could be considered in further advancing their effectiveness.

Greater clarity and coordination in the learning opportunities available to policymakers may be needed. While various courses address participation, they often do so from different angles – such as participation as a form of public communication (HSPA), or participation as part of the political process (Hans Seidel Foundation) – without a clear structure linking these messages. As it stands, more may be needed to ensure policymakers know what course to take for which purpose, including by reviewing course contents and coordinating across providers to make it easier for policymakers to navigate options and select the most appropriate offer.

The new statutory requirements on public consultations under the Laws of Ukraine “On Public Consultations” and "On Amendments to Certain Laws of Ukraine Regarding Democracy at the Local Self-Government level" will also require dedicated training opportunities for national and local government officials. At the local level, non-government organisations, including the All-Ukrainian Association of United Territorial Communities and the Association of Ukrainian Cities already address some of this demand. They work to promote the voices of local authorities in reform processes as well as facilitate peer learning and exchange among local level officials. The Association of Ukrainian Cities has developed several guidance materials, including guides on local government interaction with civil society institutions, open government data, open government under martial law, public involvement in local government to support local authorities to build open government and citizen participation capacities. It will be crucial that the HSPA coordinate closely with these organisations in developing guidance on adherence to new legislative requirements.

Further alignment could also be made with international standards on citizen and stakeholder participation trainings and guidelines, including the OECD Guidelines for Citizen Participation Processes (OECD, 2022[18]).For example, in alignment with OECD guidelines, the course could also consider introducing quality measures to ensure meaningful participation processes, and provide checklists for policymakers to follow in designing, planning, implementing and evaluating participation processes.

Building capacities for participation in society is also key to promoting a culture of participation. CSOs interviewed by the OECD reported more can be done to build citizens’ civic education and build trust in participatory processes. To address this, the Government of Ukraine has included a number of actions, including for instance in the Roadmap for the Functioning of Democratic Institutions, which lists as a measure to hold information events for citizens, CSOs, and business associations on taking part in civic participation opportunities (Government of Ukraine, 2025[65]). The Government could collaborate with CSOs to design and implement comprehensive civic education programmes to ensure these are adapted to the varied needs of different target audiences (e.g., rural groups, young people).

Fostering a culture of participation by closing the loop and demonstrating impact

Ensuring citizens feel their contributions in participation processes are impactful is key to fostering their trust in government and public institutions, and ensure their continued engagement in participation opportunities. The SCMU has made commendable progress in systematising the tracking of participation outputs (e.g., the number of participation activities – including public consultations – that ministries, agencies and local authorities implement on a quarterly basis). As of 2025, it also reports on aggregate outcomes, such as the total number of participants involved (including citizens, civil society organisations, and business representatives) and the overall number of proposals submitted, as well as their aggregate rate of acceptance, partial acceptance, or rejection (SCMU, 2026[66]).

However, aggregate-level reporting provides limited insight for individual participants on how their perspectives were considered. Citizens and stakeholders who take part in a specific consultation are usually interested in whether their input was considered and how it informed the final decision. While consultation-specific feedback (such as short reports summarising key inputs and the administration's response) is provided in some cases in Ukraine, further efforts could help make this practice more consistent and predictable across participation processes. Establishing clearer and more systematic reporting practices for each consultation would enable participants to more easily verify how their contributions were considered, strengthen their perception of having a voice, and increase the likelihood of continued engagement. In addition, disaggregating participation data by consultation can support public authorities in identifying differences in interest across policy topics, as well as gaps in representation of different population groups.

OECD interviews also showed a need to enhance the transparency and accountability of participatory processes, and to build further credibility and perceptions of impact. This can be done by ensuring that public authorities 'close the loop' and issue public responses on the outcomes of consultations. In Ukraine, requirements to close the loop are stipulated in the Resolution of the Cabinet of Ministers No. 996, as well as the Law of Ukraine On Public Consultations. However, the extent to which this is done in practice is unclear. Several countries have embedded accountability mechanisms as part of their participation processes to enhance the credibility of participation and foster continued engagement. For example, the New Zealand Law Commission issues public reports of public consultation outcomes for each legislative reform process (Government of New Zealand, 2025[67]). In Canada, the Department of Justice's Policy Statement and Guidelines for Public Participation sets out a requirement to report on consultation outcomes (Government of Canada, 2025[68]). In Brazil, Brazil Participativo – the country's federal-level digital participation platform – enables over 1.5 million users in Brazil to access information on consultation opportunities and outcomes, as well as track the policymaking process for policy projects across government (Government of Brazil, 2025[69]).

Fostering a culture of participation by building institutional knowledge

Collecting standardised data on public consultations and enabling exchange across the public sector, through for instance developing a repository of good practices and fostering information exchange across public officials on the outcomes and lessons learnt of consultation exercises, can also be a driver for innovation and adaptability to different policy needs and contexts. The central government website of Ukraine includes a civil society page which includes a section on good practices. This section compiles international guidelines on citizen participation and domestic examples and study cases (Government of Ukraine, 2025[70]).. Opportunities exist to strengthen this page to enable policymakers to highlight ongoing initiatives and obtain more practical, context-specific guidance. In Spain, for example, the Government has set up a Sectoral Commission on Open Government, which serves as a space for coordination, collaboration, and debate among Spanish public administrations (state, regional, and local) to exchange on experiences and develop joint initiatives in the field of open government, including citizen participation exercises (Government of Spain, 2025[71]). As another example, the Government of Ireland funds a hub to support governments to improve public consultations with children and young people, particularly those in precarious situations, called *Hub na nOg.* The hub collects records of consultations with children and youth across the public sector, enabling policymakers to build their skills on the subject (Hub na nOg, 2025[72]).

Fostering a culture of participation by institutionalising civil society participation

Since 2016, civil society organisations (CSOs) in Ukraine have expanded significantly, playing a key role in social cohesion, promoting democratic values, and acting as intermediaries between citizens and government. There is also notable mobility between government and CSO leadership – it is not uncommon that former members of government become leaders of CSOs and vice-versa – has been an enabler for

co-operation. Yet, OECD interviews show that CSO access to government decision-making remains limited and uneven, with well-established CSOs with preexisting contacts in government having more influence on decision-making processes than less-established ones. While some engagement with government is institutionalised via the National Strategy for Promoting Civil Society Development, CSOs primarily interact with officials through informal channels, and many continue to face challenges in identifying clear government contact points.

4.3. Citizen and stakeholder participation in Ukraine today

This section discusses current citizen and stakeholder participation practices in Ukraine. It finds that while nearly all national public institutions involve citizens in their decision-making processes, more could be done to develop quality standards, adopt a more coherent, standardised approach to existing consultation practices, and engage citizens throughout the policy cycle to ensure more impactful participation. Further, more can be done to adopt lessons learnt from innovative pilots and continue adapting participatory methods where possible.

Most Ukrainian public institutions have a mandate to engage with citizens and stakeholders

Most government bodies adopt participatory policymaking approaches

All ministries, central executive bodies, Council of Ministers of the Autonomous Republic of Crimea and local state administrations in Ukraine have a legal mandate to engage citizens and stakeholders in their decision-making processes through participatory approaches (see Table 4.1) to inform policy, legislation and public service delivery. Although the Ukrainian Constitution, the Law On Amendments to Certain Laws of Ukraine Regarding Democracy at the Level of Local Self-Government, and the Law on All-Ukrainian Referendum enable citizens to take part in direct democracy, including referenda, (see Box 4.2) no legitimate processes have taken place at the national or local level in Ukraine in the past five years.[5]

According to data collected by the SCMU, 76 executive authorities held 748 public consultation events during the fourth quarter of 2024 (Cabinet of Ministers of Ukraine, 2025[73]). Most consultations were held by Ministries (306 out of 748), followed by regional authorities and Kyiv (226) and other central executive bodies (216). An analysis of the participation forms adopted (i.e., direct, participatory, deliberative) shows that nearly all processes mapped by the SCMU fall under the 'participatory' category, as they focus on consultations on draft policies and legislation (see following sections for a breakdown of participatory methods and tools used).

Participation opportunities are broad in scope, but take place mostly at the decision-making stage

According to SCMU data, at the national level, the policy areas which were most consulted on by the last quarter of 2024 were health (77 consultation events conducted by the Ministry of Health), agrarian policy (33, Ministry of Agrarian Policy), education and science (31, Ministry of Education and Science) and social policy (30, Ministry of Social Policy) (Cabinet of Ministers of Ukraine, 2025[73]). At the central executive authority level, the State Tax Service conducted the highest number of consultations (44) followed by the National Health Service (32), and the National Police (12). Local executive bodies do not report the policy areas on which they consult. Nonetheless, the areas with highest number of consultation events included the Kirovohrad Oblast Administrative District (29), Volyn Oblast Administrative District (26), Kyiv City State Administration (25), and Chernihiv Oblast Administrative District (23) (Cabinet of Ministers of Ukraine, 2025[73]).

While the SCMU does not collect data on which stage of the policy cycle these participation processes occur, an analysis of indicative plans across Ministries shows that most participation opportunities take place ahead of the decision-making stage, where policymakers publish draft policies or legislation to collect citizens' perspectives. This process is important as it enables policymakers to hear the views of citizens and stakeholders ahead of the adoption of binding legislation, policy, regulation, by-laws and decrees.

Participation opportunities however are less frequent in the other policy stages of agenda-setting (enabling citizens and stakeholders to help identify emerging challenges and needs), policy formulation (engaging citizens and stakeholders to formulate policy solutions), implementation (collaborating with citizens and stakeholders in actions to implement policy) and evaluation (enabling citizens and stakeholders to assess the process, impact and outcomes of implementation). As seen in Figure 4.1, this represents lost opportunities for more meaningful participation upstream, and greater accountability downstream. Pilot processes in the Ministry of Labour and Social Affairs in Armenia, for instance, show positive results when engaging citizens throughout the budget cycle, from the conception phases to budget setting, to deliberations in the National Assembly (OECD, 2024[74]). See Box 4.10 for further examples of expanding citizen and stakeholder participation across the policy cycle.

Box 4.10. Strengthening citizen participation in monitoring infrastructure projects at the local level in the Philippines

The Provincial Government of South Cotabato in the Philippines included as a priority of their 2022-25 Open Government Action Plan to increase citizen participation in monitoring local infrastructure projects to increase accountability of government and private contractors, encourage civil society organisations to take part in project developments, and enable public access to information to monitor projects. Such projects were designed to prioritise the delivery of basic services in conflict-affected areas for those most affected.

The government prepared circulars for citizens and CSOs with information on local infrastructure projects and how to participate in monitoring exercises. In addition, a government-led Project Monitoring and Evaluation Committee (the Barangay Project Monitoring and Evaluation Committee) was set up with members from government, CSOs, and schools. The Committee received presentations on how to monitor progress, and was supported by public officials who collected and processed their monitoring reports. Such reports were then submitted to the Barangay Development Council, who would then liaise with project implementers to provide feedback where relevant.

Evaluations from this project show that the exercise contributed to stronger accountability by project implementers. Lessons included providing ample time for citizen participation exercises to take place, ensuring attendance from key CSOs by providing sufficient notice and information, and prioritising in-person meetings to improve the quality of participation.

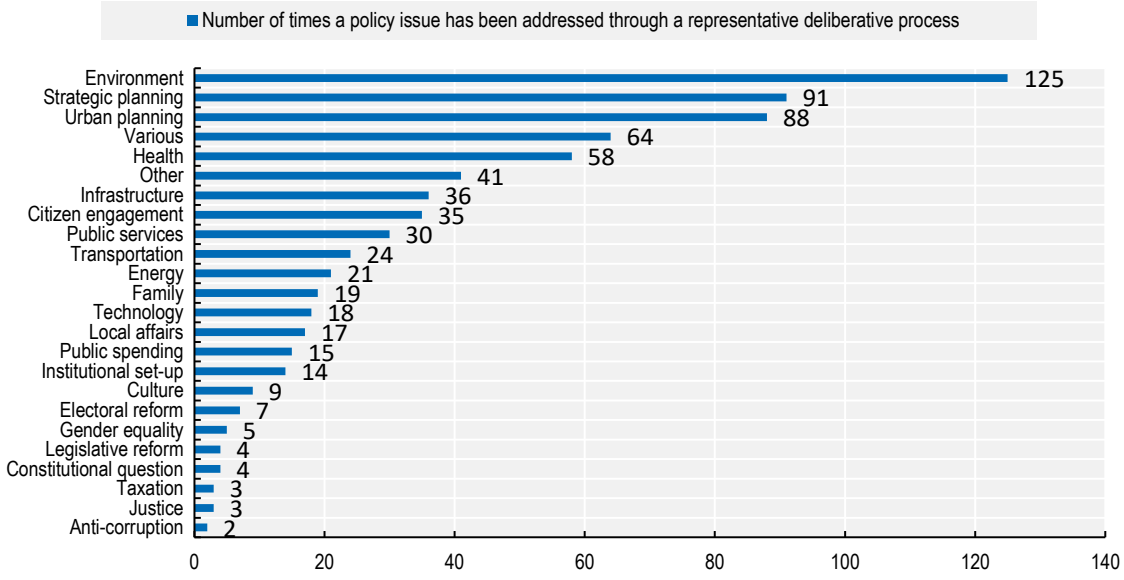
Source: (DILG, 2025[75]; OGP, 2025[76])

Government bodies do at times conduct public opinion surveys and consider non-government organisations' analytical reports on citizens and stakeholder perceptions on key policy issues to inform agenda-setting. OECD interviews, however, show that more can be done to broaden the range of CSOs engaged in these exercises to ensure broader representation of perspectives. Digital participation tools are being leveraged to adapt to wartime constraints and continue providing critical services.

The uptake of innovative participation methods, including deliberative democracy and participatory budgeting, is strongest at the local level

Innovative citizen participation opportunities can enhance the impact of national-level consultations. For example, evidence from more than 700 cases gathered across 26 OECD member countries and 8 Accession and non-member countries shows that the use of representative deliberative processes has been increasingly used to address complex policy problems requiring important trade-offs. Deliberation can also be used to strengthen integrity and prevent corruption, ensuring that decision-making processes are shielded by undue influence from interest groups, and can be a tool to address polarisation and disinformation (OECD, 2020[77]). Further, deliberative processes can help foster a sense of ownership and shared responsibility, helping to address polarising issues with tailored and legitimate policy solutions. In addition, such processes have proven effective in building civic skills and enhancing social awareness on public issues (KNOCA, 2025[78]).

Figure 4.5. Representative deliberative processes are increasingly used to address complex and long-term challenges



Source: OECD Deliberative Democracy Database

The first two deliberative processes in Ukraine took place in 2024, in the cities of Zvyahel and Slavutych. They were implemented by their respective city councils with support from the Council of Europe in planning, implementing and evaluating the processes. These cases represent a strong case study for how deliberative democracy can be used to foster social cohesion and resilience in a wartime context, with a tangible impact and results (see Box 4.11 for details). Considering their success, the City Councils of Zvyahel and Slavutych are planning to institutionalise the Citizens' Assemblies by incorporating it into their Statutes as a civic participation tool. OECD interviews with CSOs and international organisations show support to continue expanding deliberative practices across municipalities and at the national level. At time of writing, the Government of Ukraine outlined as a commitment to the country's EU accession process to learn from international experiences on deliberation to further strengthen such a practice in Ukraine.

Box 4.11. Deliberative Citizens' Assemblies in Ukraine

Citizens' Assembly in Zvyahel: "Creating Urban Spaces as Public Locations for Social Interaction and Recovery"

The Zvyahel Citizens' Assembly, Ukraine's first deliberative democracy initiative, concluded on November 3, 2024, after three weekends of discussions. To ensure broad representation, 4000 invitation letters were sent to randomly selected households in the community. 45 participants and 12 alternates were selected from the pool of respondents by a stratified random draw. Two seats were reserved for internally displaced persons (IDPs). The process was facilitated by the Council of Europe, and participants engaged in structured discussions, expert presentations, and group work to develop recommendations to improve urban spaces. In its final session, the Assembly presented a vision for urban spaces, developed an advocacy plan, and formed eight initiative groups and a new CSO to sustain engagement.

The Assembly had an institutional impact, with the Zvyahel Mayor, Deputy Mayor, and City Council members attending and receiving recommendations presented by participants. Plans to incorporate the Assemblies as part of a tool in the city's Statute are underway.

Citizens' Assembly in Slavutych "How can we improve the household waste management system in our community?"

The second Ukrainian Citizens Assembly took place in the city of Slavutych. It was launched on 19-20 October 2024 and concluded on 23-24 November 2024. It followed the same methodology as the CA in Zvyahel, spanning over three weekends, and including 45 randomly selected main participants and 12 alternates. The municipal website provided an online platform for residents to submit ideas and opinions on the Assembly's topic.

Citizens' recommendations were presented to local authorities in a report and, at the closing event, the Mayor of Slavutych emphasised the importance of the CA. He stated: "Certain instruments of democracy do not work during the war, so mechanisms of deliberative democracy, such as the Citizens' Assembly, are extremely important today. I am convinced that we should use this tool in the future." The City Council is also looking to institutionalise CAs via Statute.

Source: (Council of Europe, 2024[79]; Council of Europe, 2024[80])

Securing the long-term sustainability of innovative citizen participation practices – such as deliberative processes –can be a way to strengthen Ukraine's democratic resilience in the long term. Successfully replicating deliberative pilots will require effective peer-to-peer learning opportunities, including leveraging existing local government networks (e.g., the Association of Ukrainian Cities) to showcase practices and encourage uptake across different regions. It could also require revisions of existing legislative frameworks (e.g., the Law on Public Consultations, or the Amendments to Certain Laws of Ukraine Regarding Democracy at the Level of Local Self-Government) which already cite different forms of participation. Finally, in the long term, securing stable funding and ongoing public commitment that is resistant to shifting policy or budgetary priorities is crucial.

Participatory budgeting (PB) is another democratic tool for people to have a direct say on how public money is spent through direct allocation of government resources to priorities or projects. Those resources are usually predefined by public authorities, who allocate a specific budget to the process. In most cases, citizens submit proposals for projects, which are then reviewed by government officials and voted on by citizens. Across OECD countries, most PB practices take place at the local level.

In Ukraine, there is currently no regulatory or legal framework on participatory budgeting, and this form of participation does not currently take place at the national level. Nonetheless, the decentralisation reform of 2014 opened new avenues for citizen participation at the municipal level, and gave way to a strong uptake on PB as a participation method (Schmäing, 2023[6]). As of 2021, the country ranked among one of the top European countries with participatory budgeting projects in place, after only Poland, Portugal and Spain (Dias, 2021[81]).

An in-depth account of PB uptake at the local level is beyond the scope of this chapter. However, it is worth highlighting the potential role of PB in reinforcing trust in government and fostering better policy outcomes. Most literature on mapping the uptake of PB at a local level in Ukraine – produced by international organisations and CSOs – points to a significant positive correlation between trust in local government and PB (Volodin, 2019[82]; Schmäing, 2023[6]; Khutkyy and Avramchenko, 2019[83]).

Box 4.12. Participatory budgeting in Ukraine

Digital participatory budgeting

The NGO 'Social Boost' led the development of the first digital variants of participatory budgeting in Ukraine. Drawing from in-person practices, digital participatory budgeting includes citizen-led proposals for projects, which are then accepted or rejected by municipal-level administrations based on whether they conform with technical and legal regulations. Once projects are selected, citizens can vote, with the project receiving the most votes being implemented by the municipality. While citizens are not usually engaged in project implementation, municipalities are required to report on implementation outcomes on the PB platform.

The Social Boost platform is the most widely used across municipalities, with over 100 cities and communities having used it to implement a participatory budgeting process.

Source: (SocialBoost, 2025[84])

Participatory budgeting has been increasingly used across OECD and non-OECD countries. See Box 4.13 for further examples.

Box 4.13. Local-level participatory budgeting in Chile

Peñalolén, a Chilean commune in the province of Santiago, had been experimenting with participatory budgeting since 2008, to strengthen citizen participation in policies to address local development priorities. In 2019, the commune launched a digital participatory budget version to reduce costs, amplify reach, and supplement ongoing in-person processes to enable citizens to have a say on local urban planning projects.

The municipality of Peñalolén led the initiative by launching the main website, organising citizen training workshops, and allocating CLP 500 million (approx. €545,000) to be distributed among winning proposals from each sector. Local community centres and neighbourhood councils also hosted information sessions to engage residents in the process. A range of strategies were used to engage underrepresented groups, including targeted workshops for older adults and youth, a preparatory project on environmental proposals for young citizens, and open training sessions for the general public.

Over 24,450 inhabitants participated in this project via the online platform, representing over 10% of the total population of Peñalolén. Citizens submitted 169 proposals for the 2019-20 round. To ensure

quality, each idea had to include documentation, a clear solution description, and signatures of support from other citizens. While this represented a higher bar for participation, the exercise fostered a more collaborative community engagement. Of the initial proposals, 48 met the eligibility criteria for funding. In the final phase, over 15,000 residents voted for their preferred projects. Votes were relatively evenly distributed, reflecting a wide range of local priorities. Based on the results, ten projects—spread across different neighbourhoods—were selected to receive municipal funding. An analysis of the practice shows that enabling citizens to see feedback from other citizens and being able to interact with other ideas boosted engagement,

Sources: (Go Vocal, 2023[85]; Participedia, 2021[86]; Penalolen, 2025[87])

Ukraine employs a variety of participation mechanisms, including online portals, advisory councils, and in-person participation. Since the beginning of the war, the Ukrainian government has made concerted efforts to leverage digital technologies to continue engaging citizens in policy decisions and delivering critical services (see sections below). The following pages assess the most used participation mechanisms, while Table 4.2 provides a mapping of mechanisms used in Ukraine to date. As seen below, while many of the citizen participation mechanisms discussed are legally mandated (see Box 4.2), further efforts could help aligning their implementation with international practices.

Table 4.2. Participatory mechanisms in Ukraine according to the OECD ladder of participation

Mechanism	Description	Relevant legislation or policy	Aimed at citizens and/or stakeholders	Level of Participation
In-person public consultations	These include round tables, public forums and meetings with the public led by the Government to collect citizen and stakeholders' feedback on the development or updates of state policy.	Cabinet Resolution on Ensuring Public Participation in the Formation and Implementation of State Policy	Citizens and stakeholders	Consultation
Ministry-specific online consultation platforms	Dedicated "Public Consultations" sections on the official websites of each executive authority where citizens are provided the opportunity to review and provide inputs on draft laws, programmes, and budgets. Such platforms are also used for information purposes.	Cabinet Resolution on Ensuring Public Participation in the Formation and Implementation of State Policy	Citizens and stakeholders	Information; consultation
Unified State Web Portal on Electronic Services (Diia)	Online portal providing citizens with information about public services. Polling on key issues regarding initiatives aimed at addressing public administration matters is conducted through the Diia.	Cabinet Resolution On Approval of the Procedure for Conducting a Survey on Initiatives Aimed at Solving Public Administration Issues in Various Spheres of Public Life on the Unified State Web Portal of Electronic Services	Citizens	Information; consultation
Participatory Budgeting (PB)	Local-level mechanisms allowing citizens and stakeholders to influence public decisions through the direct allocation of public resources to priorities or projects.	Not attached to a specific legislation or policy	Citizens and stakeholders	Engagement
Targeted government mailing to stakeholders	Form of targeted outreach to key stakeholders (e.g., unions, associations, CSOs) to include their views in the policy process.	Law of Ukraine On Public Consultations Regulations of the Cabinet of Ministers of Ukraine	Stakeholders	Consultation
E-newsletters	Media prepared to provide updates on the development of specific policies	Not attached to a specific legislation or policy	Citizens and stakeholders	Information

Mechanism	Description	Relevant legislation or policy	Aimed at citizens and/or stakeholders	Level of Participation
	and plans to citizens that sign up to receive information (e.g., the National Strategy for Civil Society Development, the Open Government Partnership Initiative.			
Co-creation mechanisms	These include workshops of the future, world cafés, and/or facilitated discussions for citizens and stakeholders to discuss government strategies and plan.	Not attached to a specific legislation or policy	Citizens and stakeholders	Engagement
Deliberative processes	Group-based dialogue among randomly selected citizens to identify solutions and inform public decisions. It involves weighing options, considering a range of perspectives, and using experts and information to assess trade-offs. Currently piloted at local level.	Not attached to a specific legislation or policy	Citizens	Engagement
Ministry- and local-authority-specific consultative and advisory bodies	Advisory group composed of civil society organizations (CSOs) that facilitates stakeholder engagement in policymaking. Its role is to propose consultations, review draft acts and plans, and recommend amendments.	Cabinet Resolution on Ensuring Public Participation in the Formation and Implementation of State Policy as well as relevant Resolutions of the CMU on the functioning of public advisory and consultative bodies. Laws of Ukraine "On Central Executive Authorities" and "On Local State Administrations"	Stakeholders	Consultation; engagement
Electronic petitions	Online platform to provide citizens with formalised channels to launch petitions to the President of Ukraine, the Verkhovna Rada, the Cabinet of Ministers, and local authorities.	Law of Ukraine "On Citizens' Appeals"	Citizens and stakeholders	Engagement

Ministry-specific participation portals are active, although practices vary across public bodies

Resolution No. 996 of 2010 requires all Ministries, other central executive bodies, the Council of Ministers, and regional authorities to establish a dedicated “Public Consultations” page within their official website. Ministries currently use these portals to publish a copy of their indicative plans, as well as enable citizens to provide feedback on draft legislation, strategic documents, and draft policies. All public authorities collect and report data on how many consultations were published, enabling better monitoring from the SCMU on participation outputs.

SCMU data for the fourth quarter of 2024 showed that most consultations (255 of 306) at the Ministry level were conducted online, with virtual and in person public conferences coming at a distant second place (19). Other participation tools, including meetings with public councils and other advisory and consultative bodies (14), forums (7), and roundtable meetings (4) were also recorded (Cabinet of Ministers of Ukraine, 2025[73]). In addition, SCMU longitudinal data shows that the emphasis on online consultation methods cannot be attributed to ongoing security challenges alone, with similar skews showing even before the COVID-19 crisis (Cabinet of Ministers of Ukraine, 2025[73]).

Across the OECD, countries are adopting more varied approaches to citizen participation practices at a national level as an effective way to capture a broader range of insights and increase their responsiveness to public needs (OECD, 2023[40]). Complementary approaches – e.g., utilising quantitative results from online polls and qualitative outcomes from roundtable discussions – can often provide clearer and richer policy insights. In addition, expanding participation methods can ensure the participation of a wider range

of population groups by removing barriers related to factors including civic literacy levels (e.g., children and youth), tech-savviness (e.g., older people), and social exclusion (e.g., internally displaced peoples and rural communities). Over-reliance of a particular consultation format can also lead to disengagement, as citizens have more expectations on how governments communicate with them. Developing more dynamic approaches to participation can ensure the public service is more agile, responsive and includes a wide range of people and groups.

An analysis of how the "Public Consultations" pages on the official websites of executive authorities are used in practice shows wide variance in terms of how consultations are published and what information is provided, how citizens can provide feedback, and whether government bodies report back on consultation outcomes. For example, some Ministries require citizens to log in through a portal with their social media accounts to provide feedback, while others instruct citizens to send emails to a dedicated address or call dedicated contact points. Citizen inputs (i.e., their feedback to consultations) are also not reported on in a consistent manner.

Developing a uniform approach to these pages is crucial for several reasons. First, it can reduce access barriers, as standardising formats and processes reduces the learning curve for those less familiar with government processes, and makes participation opportunities more user-friendly. Second, it can build trust and ensure long-term engagement – predictable and familiar processes enable citizens to know what to expect, building credibility over processes and increasing the likelihood that they will engage again. Third, it can increase clarity and transparency by standardising approaches to publishing policy proposals and ensuring governments provide feedback on outcomes, citizens can more easily identify gaps in accountability and transparency. Finally, standardisation on how and what kind of citizen feedback is collected enables better information sharing across the public sector, which in turn can lead to more informed transversal policy approaches and solutions. An ongoing reform to centralise participation opportunities via the cross-government citizen participation platform (see following section) will eventually require that executive authorities and state collegial bodies phase out their own participation pages and instead use the aforementioned participation platform, providing links to their Ministry-specific websites. This will not be compulsory for other government entities conducting public consultations (including at the local level), who are given the option to publish consultation opportunities either on their own websites or in the cross-government citizen participation platform. While this reform takes place, the SCMU has centralised links, recommendations and resources through a “Recommendations and Best Practices” portal to support public bodies in strengthening participation practices (SCMU, 2026[88]).

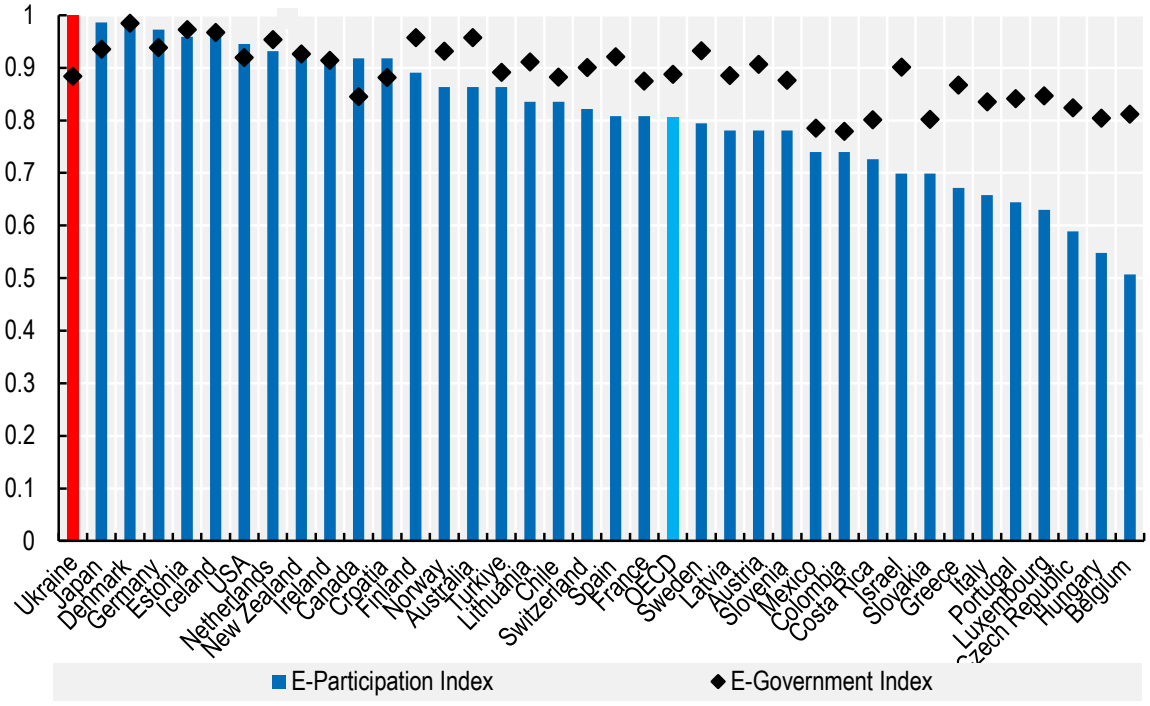
Government-wide initiatives are being launched to centralise participatory portals

Centralised participation platforms – where public institutions publish consultations and engagement opportunities – are a widespread practice among OECD member and partner countries. In fact, 27 out of 32 OECD countries (85%) have reported having government-wide participation portals where all ministries at the national level publish consultation opportunities (OECD, 2023[51]). These portals can act as ‘one-stop-shops’ for citizens and stakeholders to learn about past, current, and future opportunities for participation, and can be useful tools to inform the public on how their inputs were considered. In addition to the adoption of centralised participation platforms, some OECD countries have begun incorporating civic technology, including AI, blockchain and virtual reality, to enhance participation. Findings suggest such technologies can be leveraged to reduce barriers to participation, increase capacities in government, and ultimately empower citizens with more intelligible and accountable participatory processes (OECD, 2025[89]).

Since the onset of Russia’s full scale-invasion in 2022, Ukraine has demonstrated remarkable technological innovation to continue providing services and information to citizens to foster societal resilience. In 2024, Ukraine ranked first in the world, ahead of 193 other countries, in the E-participation

Index of the UN E-Government Knowledgebase6 (UN, 2024[90]), reflecting a strong commitment from the country on digital government.

Figure 4.6. Ukraine ranks first in the world in the UN E-Participation Index, 2024



Source: (UN, 2024[90])

As part of Ukraine's Roadmap for Public Investment Management Reform, as well as the OGP Action Plan for 2023-2025, the country has launched a digital platform called the 'State Digital Restoration Ecosystem for Accountable Management' (DREAM), which centralises all restoration and modernisation projects in Ukraine. DREAM enables to follow progress on these projects at all stages, from the planning, development and implementation to ensure accountability at the national, regional and local level. The platform represents an innovative and forward-looking tool to enable citizens and stakeholders (including at an international level) to know more about the different restoration projects in Ukraine. A plan to develop an e-democracy component as part of the DREAM platform in collaboration with RISE Ukraine, a coalition of approximately 50 CSOs, is underway. In accordance with Resolution No. 522 of the Cabinet of Ministers of Ukraine, the Ministry for Development of Communities and Territories of Ukraine is developing a Unified Geoinformation System for Monitoring and Evaluation of the Development of Regions and Territorial Communities. Based on geospatial information presented in the form of multilayer maps, the system aims to enable residents of territorial communities, business representatives, and other stakeholders to visualise and use analytical tools to better understand the state and territorial development priorities.

While no centralised government platform for participation exists in Ukraine yet, the Law on Public Consultations includes in its provisions to develop a centralised e-democracy platform to engage with citizens and stakeholders. This platform is currently in development, with plans to be fully operational once martial law is lifted.

The Ministry of Digital Transformation already operates the Unified State Portal of Electronic Services Diia (Дія) (see Chapter 1 of the Review). Diia serves as a one-stop-shop for citizens enabling them to access all public services, government documents, and digital government identification (e.g., update drivers

licenses, tax numbers) tools in Ukraine. The website also provides trainings to citizens, including on building citizenship skills (See Box 4.9 for further information). The Diia website also enables citizens to provide feedback on public services through polls, although these are not considered official consultation mechanisms in the government.

The development of the cross-government citizen participation platform has the potential to significantly change citizen and stakeholder participation in government decisions by simplifying processes, increasing transparency, and addressing access barriers. It could also be used as an internal tool as a reference for public officials to access guidelines and promote good practices. At the same time, its effective implementation and long-term success will require policymakers to also adapt their approach to participation to enable more informed participation processes.

Important demographic considerations must also be considered to ensure this platform is accessible to all. While 82.4% of the population in Ukraine has access to an internet connection, significant variance exists among age groups, with younger (ages 15 – 24) people being significantly more connected (at 99.5%) than older population groups (83% for 25-74 and 19% for 75 and above) (ITU, 2024[91]). To ensure that technological innovations in the participation space engage all relevant people and groups, public officials could always ensure to provide non-digital alternatives. These can include, for instance, phone consultations, in-person meetings, or paper mail.

Box 4.14. Innovative civic technologies across OECD countries

Estonia's E-participation Platform r*ahvaalgatus.ee*

Rahvaalgatus.ee is a digital government platform that allows Estonian citizens to propose, discuss, and collaboratively shape new laws and policies. The platform has collected over 500,000 signatures since its development, with 119 initiatives sent to the Parliament and 60 to local municipalities. The platform enables citizens to propose policies and track progress on their proposals. It also fosters collaboration between users to prepare petitions, leading to more well-rounded and comprehensive policy proposals. It is integrated into Estonia's digital infrastructure, such as the electronic ID card system, SIM card centred mobile-ID and its newer smartphone-centred counterpart: the Smart-ID, making it easier for citizens to participate. The Estonian Parliament has also been responsive to proposals from the platform, including for instance by banning fur farms and legalising same-sex marriage.

Finland's National Dialogues Platform

Finland's National Dialogues are structured discussions used to engage a wide range of societal actors in Finland and build a common understanding of different social issues, challenges and opportunities. They can be organised by any national or local government body, as well as non-government institutions. To enable a coordinated approach to National Dialogues, the Ministry of Finance has developed an online platform to centralise all Dialogues taking place at any given time. The platform issues guidance and technical support for implementers wishing to launch a Dialogue, and provides information to the public on how Dialogues work, what their purpose is, and how citizens can take part. The platform includes social media templates for prospective organisers to raise awareness of the Dialogues and disseminate opportunities to take part. It also includes a template and guidance on how to report on outcomes. An OECD report on trust in government and a civic space scan in Finland from 2021 point to the Dialogues model as a strong positive driver for trust in government. The Platform's guidelines ensure that good practices are maintained, and that policymakers have the capacities to continue developing these initiatives.

Source: (EU, 2023[92]; Government of Finland, 2025[93]; OECD, 2021[94]; OECD, 2021[95])

Public councils

The establishment of public councils within Ministries, other central executive bodies, the Council of Ministers, and regional authorities is required by Resolution No. 996 of 2010 (amended in 2019 and 2022). Other laws and resolutions of the Cabinet of Ministries (e.g., the Law On Central Executive Bodies and On Local State Administrations) enables public bodies to establish consultative or advisory bodies including youth councils, IDP councils, councils of entrepreneurs and so on. These councils are varied in their composition across public bodies, but must include civil society representatives among their membership. They serve as a consultative body to inform draft legislation and policies, and can propose the launch of public consultations on relevant topics. During martial law, the formation of new councils established under Resolution No. 996 has been suspended, and existing ones have had their terms extended. This restriction does not apply to other consultative or advisory bodies established under different legal bases.

Box 4.15. Public Councils in Ukraine

What are Public Councils (PCs) and how do they operate

Public councils are consultative and advisory bodies working under executive authorities in Ukraine. They are typically formed by up to 35 members who serve 2-year terms, they can be composed of representatives from public associations, religious and charitable organisations, creative unions, trade unions and employers' organisations, other non-government associations, and the media. Members are selected through rating voting at constituent meetings (92% of councils) and online (8%).

As of the first quarter of 2025, PCs existed under 62 executive authorities, including 12 out of 19 ministries, 30 of 42 other central executive bodies, and 19 regional and Kyiv city state administrations (except for the Dnipropetrovsk, Zhytomyr, Zaporizhzhia, Ivano-Frankivsk, and Lviv regional state administrations).

How do PCs engage with public authorities

PCs are usually required to meet at least once a quarter, although this has been challenged by restrictions under martial law. Ukrainian government data compiled since 2014 shows that this requirement is relatively well fulfilled. For instance, in the first quarter of 2025, 39 out of 61 PCs for which data was available met one or more times.

In most executive bodies, 1-2 employees are responsible for interacting with public councils. Most (85%) of PCs surveyed in 2024 cited collaborating with other divisions beyond the designated liaison unit.

Examples of positive impact

Public councils are regularly provided the opportunity to inform the activities and decisions of executive authorities. For instance, in the first quarter of 2025, 32 executive authorities engaged their public councils in consultations regarding draft regulatory acts. In addition to their advisory function, PCs may also work with public authorities on activities to build social resilience during the war (e.g., on IDPs, coordination of humanitarian aid).

There is also a strong statutory basis enabling such work. Resolution No. 976 empowers public organisations or public councils, based on the results of public expertise of the activities of executive bodies, to prepare expert proposals regarding executive body activities across policy areas. The executive body is obligated to consider such proposals and prepare a plan for their implementation.

Source: (Government of Ukraine, 2025[96]; OSCE, 2024[97])

Evidence collected by the Ukrainian Government, existing studies, and OECD interviews with civil society and relevant international organisations shows that PCs have served as a mechanism to ensure continued involvement of the public in government decisions during the war, by regularly contributing targeted expertise in the form of proposals and analytical materials. They are also key to monitoring public activities and enhancing the transparency of government processes. The vast majority also frequently work to enhance public consultations, through organising consultation activities, and collecting and summarising citizens' feedback. Over two-thirds (67.8%) of respondents to a survey to representatives of PCs rated their interaction with the government as above average (4 or 5 out of 5) (OSCE, 2024[97]).

Nonetheless, such evidence also points to a number of challenges. For instance, opportunities exist to increase their impact. At least 30% of PCs reported not performing key functions consistently in 2024 (OSCE, 2024[97]). OECD interviews align with this finding, with CSOs reporting more could be done to ensure the content of meetings enables meaningful and impactful contributions, and that meetings could be managed more efficiently by simplifying bureaucratic processes, and ensuring adequate resources were being provided. Findings also showed more could be done to strengthen the expertise of PC members to ensure that relevant, high-quality proposals are produced.

Providing clearer guidance on the scope and purpose of PCs was also identified as an opportunity. This included a lack of methodological guidance on monitoring and participation processes, weak feedback mechanisms from executive bodies and lack of clarity over how executive bodies followed up on PCs proposals. At a procedural level, more could also be done to clarify processes on forming sub-groups and carrying out regular operations (OSCE, 2024[97]). OECD interviews supported these findings, highlighting in some cases lack of clarity on the advisory role of PCs among CSOs.

Further, OECD interviews with CSOs report more could be done in terms of council member recruitment and selection processes. On the one hand, further efforts can be made to motivate potential high-quality members to become members, including for instance experts from key organisations, which cite a lack of time and resources, and the availability of other communication channels as barriers to joining PCs. On the other hand, more could be done to set more transparent and clear standards for recruitment. This finding was also echoed by preexisting commissioned studies, which point to unclear voting processes and highlight that more clarity should be provided on how members are replaced (OSCE, 2024[97]).

Further attention is also needed in Ukraine regarding considering organised stakeholders' participation in councils and citizen participation in broader processes as interchangeable or equal, which was a challenge observed through qualitative OECD interviews with Ukrainian authorities in 2024. Stakeholders provide technical expertise and specialised inputs on their subject matter area, and often have stronger capacities to participate in established mechanisms including advisory bodies. Their inputs can be helpful in navigating policy trade-offs and highlight consequences that may not be visible through citizen participation alone. Citizens, on the other hand, may need more investment in terms of resources and time to produce quality inputs, but are the ultimate beneficiaries of government decisions and can provide a unique 'lived experience' perspective which is essential to better informing government priorities. Well-designed processes often integrate both citizens and stakeholders strategically to improve participation outcomes.

The Action Plan for the Implementation of the National Strategy for Promoting the Development of Civil Society in 2025-2026 includes a number of commitments to address the aforementioned challenges, including on assessing the effectiveness of PC activities and preparing a set of recommendations on the formation and activities of PCs and other public advisory and consultative bodies in collaboration with key stakeholders and executive authorities. In this process, the Government of Ukraine could prioritise actions standardise rules of procedure for all PCs in consultation with relevant stakeholders to clarify roles and responsibilities,, including by identifying whether these should be crystalised into legislation in alignment with the Roadmap,, mandating reporting by executive authorities on how PC proposals are considered, increase the transparency of voting processes to elect members, and identify opportunities to reduce bureaucratic processes.

Local executive bodies implement more varied but fewer participation opportunities

While this chapter does not focus on participatory practices at the local level, it is important to acknowledge that local executive bodies can play a crucial role in fostering citizen and stakeholder participation. Local-level participation can be more impactful, as local governments are responsible for decisions that have a direct impact on citizens' everyday lives, including urban planning, community development and local service delivery (Fung, 2006[98]). Ukraine's decentralisation reforms have expanded participation opportunities at the local level, although findings from OECD interviews with government officials show significant capacity-building will be needed to provide more meaningful participation opportunities.

Data collected by the SCMU for the fourth quarter of 2024 shows that participation exercises are less frequent at the local level compared to the national level, with 226 public consultations being carried out by 26 regional executive bodies compared to 522 by 66 ministries and other central executive authorities. Providing a value assessment of such findings would not be pertinent due to differences in terms of proportionality (e.g., less regional executive bodies were included in reporting compared to the number of ministries and other central executive authorities) and differentiated effects of the war (e.g., at least 5 more regional state administrations are in close proximity active warzones). However, it is clear that there isa greater variety of participation opportunities at the regional and Kyiv city level compared to the national level: Online consultations (95) were still in the majority, although they were closely followed by meetings with public councils and other advisory and consultative bodies (58), meetings with the public (including online) (30), roundtable meetings (12), forums (8), 'studying public thoughts' (e.g., surveys) (4) and others (19) (Cabinet of Ministers of Ukraine, 2025[73]).

SCMU data for both 2024 and before the full-scale Russian aggression also shows that citizen participation at the regional level tends to occur less frequently than at the national level. While data on participation at the local level is not collected by the SCMU, this finding may contrast with trends observed in most OECD countries, where most citizen participation takes place at the regional and local levels (OECD, 2024[5]). The ongoing war has particularly strained local authorities, especially those affected by the war, limiting their ability to engage with the public. However, even before 2022, local authorities faced important structural barriers to delivering meaningful participation opportunities. Key challenges included insufficient administrative capacity and financial resources to meet regulatory requirements on participation, uneven fiscal decentralization and unclear distribution of responsibilities on participation, stark regional economic disparities, and varying levels of democratic experience and civic engagement across regions (OECD, 2022[47]; Alexseev and Dembitskyi, 2024[99]).

The adoption of new participatory practices at the local level has taken place in parallel to decentralisation efforts to reinforce local democracy and promote greater accountability to citizens and stakeholders. For instance, to further improve transparency and communication with the public, several local governments have begun broadcasting their public meetings. Additionally, communities of practice provide platforms for collaboration and knowledge sharing on participation practices.

The institutionalisation of starostas (local community officials representing the interests of residents) in municipalities is another example (Verkhovna Rada, 2024[100]). Starostas are appointed by the municipal council after being nominated by a percentage of the local resident population (which varies depending on the size of the municipality). Their role includes supporting the preparation of proposals for the draft local budget, provision of administrative services, monitoring local development projects and issuing reports, and, most recently, providing services for internally displaced peoples. As of 2021, they may also serve on local executive committees. Despite their role, starostas are not democratically elected, and currently lack formal responsibilities on supporting the implementation of direct citizen participation.

Despite these efforts, the OECD finds that local authorities will continue to face significant challenges to implementing participation opportunities and adhering to new legislative requirements on local-level participation (see Box 4.2). As discussed in previous sections, new legislative amendments establish that

local authorities should develop consultative bodies, embed participation into each village, settlement and city councils' Charters of Municipality, adopt innovative citizen participation methods, and strengthen their engagement with youth and internally displaced peoples. Interviews with government bodies in Ukraine, international experts and CSOs point to the need to improve local authority's digital proficiency capacities, raise awareness of the purpose of participation exercises, and improve collaboration with CSOs by establishing formal communication channels.

An interesting example that Ukraine could look to regarding building participatory capacities at the local level is Ireland's Public Participation Networks (PPN) (Government of Ireland, 2025[101]). The Irish Department of Rural and Community Development created the PPN for local authorities to connect with community groups across the country. Community groups – including voluntary groups, local non-government organisations, and groups representing under-heard populations – must register to join the PPN in their local authority area. Once registered, they can access local news updates and receive notifications of upcoming consultations. Each PPN has its own website and must issue an annual report of activities.

4.4. Conclusions and recommendations

In conclusion, Ukraine has made significant efforts to foster and strengthen citizen and stakeholder participation, particularly considering the ongoing full-scale Russian war of aggression. Nonetheless, opportunities exist to adopt a more coordinated approach by strengthening governance frameworks and further harmonising fragmented approaches to implementation. Institutionalising participation processes and building public official capacities at the national and local levels is key to ensuring practices are streamlined. Further, while Ukraine has made important strides in embracing digital technologies and innovative participatory practices, such as deliberative democracy and participatory budgeting, ensuring the involvement of all populations, especially those with limited digital access, remains crucial. The chapter concludes that for ongoing citizen participation initiatives to have a lasting impact, they must be adequately funded and embedded into existing governance structures to support more informed, democratic decision-making and foster social cohesion. The following recommendations seek to build on existing innovative practices and respond to the abovementioned challenges, in line with the OECD Recommendation on Open Government.

Sequenced recommendations for strengthening citizen and stakeholder participation in Ukraine

Immediate priorities to sustain democratic resilience under current conditions

Strengthen the impact of laws on citizen and stakeholder participation and build public sector capacities to meet requirements at the national, regional, district, city, town, and village level:

- In alignment with priorities of the Roadmap on Democratic Institutions, define and publish clear implementation steps for the Law on Public Consultations, including a timeline and supporting measures (e.g., developing guidelines for policymakers, mapping implementation barriers, developing mechanisms to report on participation processes and success indicators, identifying the need to adopt additional Resolutions, Ministerial Orders or Instructions, recommendations to local self-government bodies) during the one-year transition period.
- Earmark funding within fiscal decentralisation reforms to build local-level capacities for implementing requirements under the Amendments to Certain Laws of Ukraine Regarding Democracy at the Local Self-Government Level.
- Promote the involvement of starostas and CSOs to strengthen the engagement of local authorities with underheard groups, including internally displaced peoples (IDPs) by co-developing and implementing targeted outreach plans as part of Charters.

Provide a unified and strategic approach to the promotion of meaningful citizen participation:

- Leverage the ongoing development of the National Strategy for Promoting Civil Society Development (2027–2032) to set participation priorities with clear commitments, including regarding meeting new national and local legislative requirements, defining coordination mechanisms with CSOs and across government, establishing guidance principles to use participation appropriately through the war efforts and beyond, and setting milestones. This effort could be jointly led by the SCMU and MoJ.
- Clarify institutional roles and responsibilities, starting from within the SCMU and across the administration, to streamline participation processes across different levels of government.

Strengthen collaboration with civil society to enable their participation in government decisions:

- Convene a working group with CSOs to discuss priorities of the National Strategy for Promoting Civil Society Development (2027–2032), including regarding addressing barriers to opportunities to take part and promoting national, regional and local government participation opportunities.

Deliver more meaningful, representative and effective citizen and stakeholder participation processes at the national, regional and local level:

- Update the good practices and recommendations section of the central government website page on Civil Society and Government to become a ‘one-stop-shop’ with practical information on selecting context-appropriate citizen participation methods and meeting national and local legislative requirements on participation.
- Map successful and innovative participation practices across all levels of government to showcase in the ‘one-stop-shop’ and support policymakers’ learning. This could be done by the SCMU at national level and the Ministry for Development of Communities and Territories of Ukraine (MDCT) at the regional and local level, in collaboration with existing local government

networks (e.g., the Association of Ukrainian Cities and the All-Ukrainian Association of Local Governments).

- Identify opportunities to expand participatory methods to better inform resilience efforts including, for instance, by engaging citizens and stakeholders earlier on and throughout the policy cycle, lowering access barriers for under-represented groups (e.g., IDPs), and providing more user-friendly and interactive participation opportunities.

Recovery priorities to ensure a participatory approach to the reconstruction

Promote a culture of participation across and outside of the public administration:

- Continue streamlining existing and new training programmes on access to information, citizen participation and engagement with CSOs across all public bodies to ensure they meet legislative requirements on participation (once in effect where relevant), and ensure these are posted in the "one-stop-shop" Knowledge Management Portal, with clear information on their different purposes and target audiences.
- Embed citizen participation skills into civil service training programmes across the public administration.
- Bring together communities of practice on citizen participation for the recovery to enable peer exchanges among relevant national and municipal representatives across Ukraine. This could be led by the SCMU at the national level, and MDCT at the subnational level with collaboration with existing local government networks.

Strengthen citizens' sense of political voice by building accountability in participation processes:

- Develop guidelines for implementing authorities to fulfil legislative requirements to monitor, evaluate and report on participation activities. This could include, for instance, developing quality checklists with guiding questions to report on the planning, implementation and evaluation or processes.
- Expand the SCMU's role to track participation outcomes per participation process, including for instance the number and different characteristics of participants taking part in consultation processes, or the results of a consultation.

Deliver more meaningful, representative and impactful citizen and stakeholder participation processes:

- Strengthen the cross-government citizen participation platform by ensuring that, once launched, it operates as a digital public infrastructure for democracy with a clear mandate. The platform should be accessible to all people and groups, offer clear and easy-to-navigate consultations, set transparent expectations, provide feedback on public input, and comply with data protection and mis- and disinformation safeguards. It should build on Diia's digital identity, state digital signature, and existing user base. Consider partnering with civil society to co-develop content and support ethical design, establishing a helpdesk for technical assistance, and integrating the platform with complementary participatory channels through targeted training and coordination with CSOs. The MDCT could lead this work with support from technical experts.

Long-term priorities for open and participatory public sector reforms

Leverage deliberation to promote a culture of meaningful participation across government and society:

- Assess the possibility of piloting a Citizens' Assembly at the national level focused on national post-war recovery efforts. This could be piloted by the MDCT, in coordination with the SCMU

and other relevant ministries. Involvement from the Verkhovna Rada's relevant committees, the Office of the President and CSOs could further legitimise and broaden engagement.

Strengthen the impact of legislative arrangements on citizen and stakeholder participation at a national level:

- Convene the working group set to review the Law on Public Consultations, led by the Ministry of Justice, to ensure alignment with OECD standards on participation. This could include, for instance, encompassing the full spectrum of participation. Periodic reviews could also be conducted to consider the need to integrate innovative participation methods. This could be led by the MoJ and the SCMU.

Promote a more citizen-centered government:

- Upon the conclusion of the National Strategy for Promoting Civil Society Development 2027-32, consider the development of an Open Government Strategy to bring together open government initiatives on public communications, citizen participation, and protecting and promoting civic space, elevating open government priorities to the highest political level.
- Consider developing a deliberation participation function within the cross-government participation platform which goes beyond petitions to support structured proposals, discussion and synthesis, is formally embedded in policy and budget decision cycles, and systematically publishes participation and impact metrics.

Coordinate the governance of participation and strengthen accountability on the implementation of participation requirements:

- Conduct a needs assessment to identify opportunities for developing a more strategic and coordinated approach to participation across the public administration, including setting common participation standards and developing a more coordinated approach to innovation, to understand whether establishing a Centre for Participation within the SCMU may be relevant.

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Notes

[1] According to the 2024 OECD Public Governance Review Survey to Ukraine.

[2] The (Forthcoming) OECD Citizen Participation Barometer provides the following definitions: **Popular Initiative:** A popular initiative is a bill, statute, or constitutional amendment supported by a group of citizens that offers an alternative to the status quo. Citizens are allowed to decide directly at the ballots on matters of concern to them, without the consent of the country's main political officials. They serve as a proactive institution on certain topics. **Optional Referendum:** Unlike popular initiatives, optional referendums allow citizens to reject a law passed by the legislature (called the "people's veto" or "popular referendum"). Citizens move second, i.e., they react to a previous move by the authorities. It is a defensive instrument in the hands of citizens. **Obligatory Referendum:** Obligatory referendums are, in most cases, limited to specific topics in the constitution or, as in Switzerland, Uruguay, and all but one of the American States (Delaware), to an amendment of the constitution. Strictly speaking, it is not a right the population uses in any active way. Rather, it is a defensive right or a veto right. **Authorities' Plebiscite:** Authorities' plebiscites are mechanisms of direct democracy that allow authorities to pose a question to the citizenry to answer. These institutions are not necessarily related to popular sovereignty in its traditional sense, which is why it can be claimed that this cannot be characterised as belonging to the direct democratic

world. Though leaders can use plebiscites perversely, during the vote itself, citizens exercise their sovereignty and are thus still fulfilling the definition of direct democracy.

[3] New Zealand's range of participation is aligned with the International Association for Public Participation, which classifies the different types of engagement as such: Informing: Providing information to help understand issues and solutions. Consulting: Obtaining public feedback on analysis and decisions. Involving: Working directly with the public to understand their concerns and aspirations. Collaborating: Partnering with the public in the design or decision-making process. Empowering: Placing decision-making in the hands of the public.

[4] As reported by the Higher School of Public Administration, Module 2 discusses Council of Europe standards including the Code of Good Practice for Civil Participation in the Decision-Making Process and Guidelines on Civil Participation in Political Decision-Making, as well as European Commission principles including the General Principles and Minimum Standards for Consultation by the Commission with Interested Parties and the Better Regulation Guidelines.

[5] This section refers to local participatory processes in sovereign Ukrainian territories.

5. The future of the public service in Ukraine

This chapter focuses on the future of the public service in Ukraine, through three elements: strengthening the learning and development system, identifying and prioritising the most-needed skills, and aligning HR practices with workforce development goals. The chapter analyses the current state of these in Ukraine and provides examples of international comparative good practices as well as successes happening within Ukraine. It concludes with a series of recommendations to help guide the Ukrainian administration in building and maintaining a public service that is ready to meet Ukraine's challenges and needs in the coming future.

5.1. Context: Focusing on the future through Ukraine's public service

Focusing and understanding this chapter in an overall context

Ukraine's public service – the workforce of the government – is, like the country as whole, facing untold challenges. These challenges exist in day-to-day work, in maintaining resiliency and in implementing strategies to ensure preparedness for a safe and successful future. This has hindered ongoing pre-war efforts to source and develop the skills and capacities needed among public servants, both by leaving some jobs unfilled and through an overall drain on the workforce talent pool in the country and within the administration. Some progress towards reforms has still been made, however other areas have seen setbacks (for example, shifts towards a merit-based and transparent recruitment process have paused). The war has meant that many initiatives have faced some degree of delay or constraint due to more limited resources (human, financial and time), and – quite necessarily – shifting efforts towards the new defence, infrastructure and energy maintenance, and diplomacy priorities placed on the country as a result of the war.

That said, new insights into resiliency abound in Ukraine. Public servants, individually and as a whole, have continued working and driving progress even when that progress faces near-constant setbacks. New innovative ways of working have emerged, to tackle challenges despite uncertainty or lack of resources. In research interviews for this report, workers admitted they are of course fatigued, and that each day is difficult – both because of the types of challenges they face at work, but also the challenges facing them as citizens of a country under attack. However, despite the fatigue, the crises, and the constraints, public servants in Ukraine display an undeterred will to continue with their vital work that can provide an exemplary case study to other countries seeking to enhance their own public service resiliency. The collective cause in Ukraine today, has engrained itself into the values of Ukraine's public service, leading to productivity and progress in circumstances that might otherwise work against such a level of resilience.

Given this, it is important to read this chapter with this in mind. This review was conducted during a time of war and aggression, when the normal functioning of government and the public service could not always be expected to continue without interruption or shortcoming. The recommendations this report makes are intended to address elements of Ukraine's public service that require strengthening over the long term. While there is a strong collective resiliency to endure the present, this chapter aims to ensure a stable and successful future for Ukraine, through its public service.

This chapter places its focus on these foundational future elements; on building and maintaining the skills and capabilities required in Ukraine's public service to face challenges in a recovery stage and beyond. These challenges include effective long-term leadership and strategy design, to policy and reform implementation, the effective management of innumerable projects related to the rebuild of areas of the country, service provision to citizens and businesses, and international diplomacy and co-operation going forward. This chapter seeks to review related elements of Ukraine's public service and provide recommendations to support Ukraine in developing a future-ready public service that is aligned with OECD and international good practices to buttress the strength, preparedness and resiliency of the country in a post-war future.

The chapter is arranged in three parts. It first lays out some important context for the analysis that follows, discussing some of the foundational work on which this chapter is built (noting important OECD and SIGMA frameworks and assessments), as well as reforms – and ongoing efforts towards them – in Ukraine.

Second, the analytical section of the chapter combines information on the current state of play with analysis on how Ukraine could improve – alongside information on existing successes and good practices. It focuses on developing a strong, capable and resilient public service across three themes:

- Strengthening learning and development systems

- Identifying and focusing on the most-needed skills
- Establishing and administering process and procedures that reinforce the above

Some examples of good practices or success stories that have emerged during the war-time period in Ukraine are found in boxes throughout this chapter. These demonstrate small elements of the whole picture of the continued resilience among the country's public service.

The final section of this chapter provides key recommendations to consider addressing or implementing going forward. The recommendations this report makes are intended to address elements of Ukraine's public service that require strengthening over the long term.

Ukraine's public service today: background and recent reforms

Responsibility for the Ukrainian public service is held within a specialised agency

Oversight and responsibility for the public service in Ukraine falls mainly to the National Agency of Ukraine on Civil Service (NAUCS). The NAUCS is a central executive authority, whose activities are directed and coordinated by the Prime Minister of Ukraine.[1] The NAUCS ensures the development and implementation of state policy in the field of civil service and exercises functional management of the civil service within government authorities, other state bodies, and their administrative offices (secretariats). Ukraine does not have a ministry or minister responsible for its public service overall. The NAUCS is responsible for HRM policy formulation and implementation, implementation of legislation related to the public service, functional management of the civil service (such as through recruitment guidelines and guidance to decentralised HRM units). In terms of day-to-day administrative HR, Human resource management services are further established within each specific government authority and report directly to the head of that authority, rather than to the Head of the NAUCS.

The NAUCS manages institutions under its mandate: the Center for Adaptation of the Civil Service to the Standards of the European Union, the High School of Public Governance, and territorial bodies (Central, South-Eastern and Western Interregional Offices of the NAUCS).

Ukraine's public service is facing shortages and a composition that reflects a workforce undergoing administrative reforms and facing the realities of war

Ukraine's public service population was just over 156 000, in June of 2025. In the same period, nearly 10 000 public servants were mobilised to the military or were in areas seeing heavy actions of war.[2] Approximately 31 600 vacant public service jobs are unfilled in Ukraine as of June 2025. In 2024, around 35 000 employees were hired, and nearly 38 000 left. In the first half of 2025, around 19 000 people were hired, but roughly the same number were dismissed or resigned. However, these figures are complicated by additional factors and cannot themselves be used to estimate vacancies. First, vacancies had historically been used in certain cases – much prior to the salary reform – as a means to augment salaries or salary budgets. Second, current Martial Law stipulates that employees must be terminated from their posts and then re-hired in order to move them into different or higher positions. Therefore, this number of exits and entries also captures employees who have been promoted or exercised any degree of mobility, making analysis difficult. It should be noted that vacancy numbers cannot reliably be used as a proxy for staff shortages in this case.

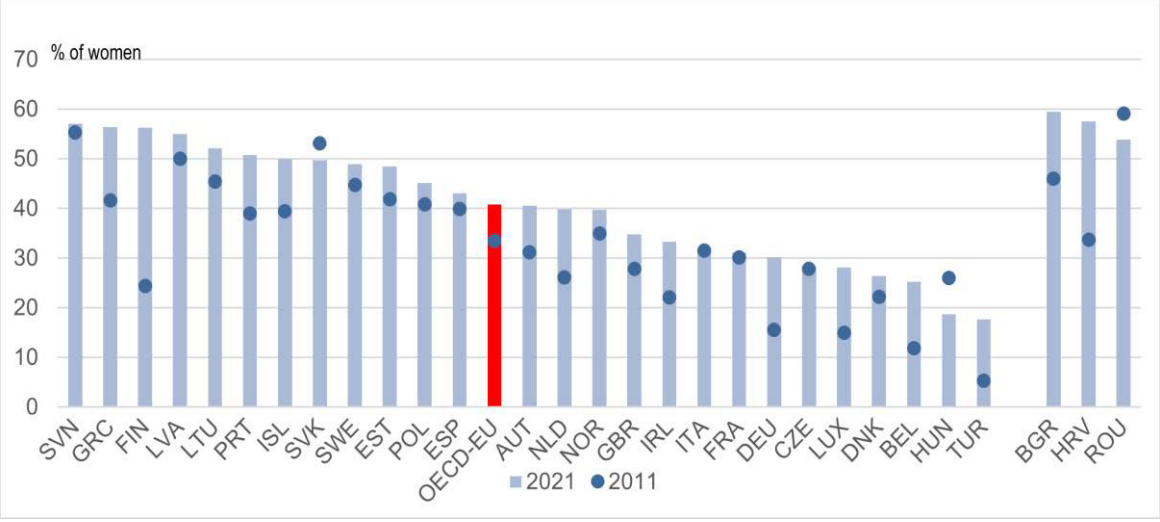
Managers across ministries, along with official data from the National Agency of Ukraine on the Civil Service, report widespread difficulty in hiring and retaining skilled workers and in filling all available roles. This is paired with heavy workload on existing staff, due to staff shortages but also due to the extraordinary demands on the country's government workers during the war.

The public service in Ukraine is classified into three staffing levels: A, B and C. Those in the A category – numbering only 227 in 2025 – are the executive leadership level. Level B represents other management levels and many workers in ministries, with just over 38 000 staff. Level C workers make up the remainder and majority of the public service workforce, representing most administrative and operational staff. In June 2025, there are just under 118 000 of these workers. These levels of workers are referred to in this way in this chapter going forward.

The structure of Ukraine's central administration is currently organised across nearly 80 ministries, agencies, services, inspectorates/oversight bodies and other organisms. This is currently somewhat in flux, as administrative reforms are implemented, and the machinery of government undergoes changes. It is also notable that very large percentages of central government workers actually work in territorial bodies, which are still affiliated with the central level. In oblasts, there is sometimes overlapping or somewhat unclear responsibility with levels of government for certain areas. The number of workers in ministries is in fact quite a low share overall in the central administration.

Ukraine has an overall very high representation of female workers in the public service, making up nearly 76% of the total workforce. While strong female representation in a public service is not unusual in OECD countries, the balance between women and men is often most apparent at senior levels. At higher levels of seniority, across the OECD, it is common to see the disparity invert, wherein more males occupy senior and decision-making posts. This can point to issues with having – or not having – the best and most-capable leaders in the most decisive posts, if women are missing out on promotions, appointments or leadership development opportunities in a systematic way (OECD, 2023[1]). The figure below demonstrates this phenomenon across the OECD. In most countries, progress is being made towards balance between men and women at top levels, with more women in senior posts in 2021 than ten years prior – however, only six OECD countries have 50% women in these roles (or more).

Figure 5.1. Percent of women in senior management positions in national administrations, 2011 and 2021

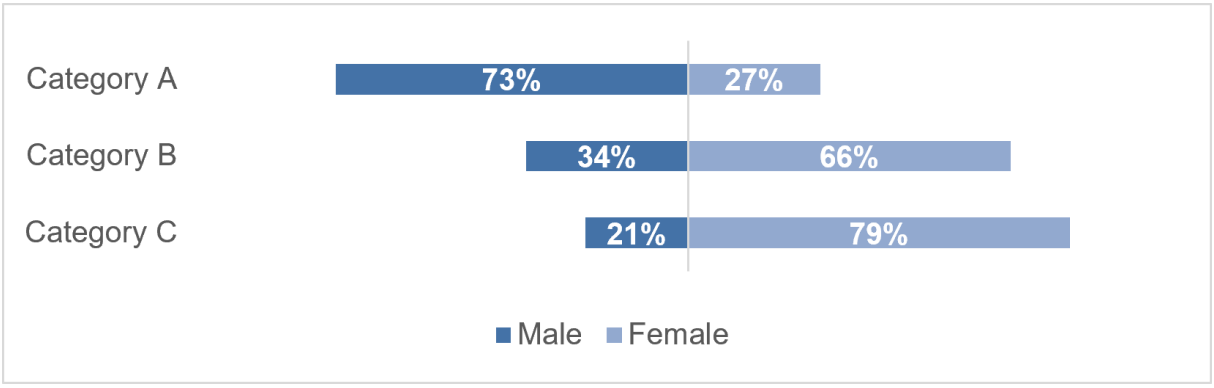


Source: (OECD, 2023[1])

Ukraine is no exception in this regard: by category A, only 27% of percent of officials are female (60 out of a total of 220), ranking below the OECD average. The strong representation of women overall in OECD countries can be explained by the large number of workers in the most junior, and lowest-paid, posts. While public services often have a high number of female employees, they work more often than men in lower-paid or less-skilled positions. These findings generally indicate a barrier in the development and promotion

of women to leadership and decision-making positions, which would need to be addressed to create balance in senior posts, and importantly to ensure that the most capable workers are filling important posts, regardless of whether they are men or women.

Figure 5.2. Precent of men and women across seniority levels in Ukraine's public service



Source: Government of Ukraine data

In Ukraine, there is an urgent need to source and train capable managers and leadership (as discussed more later in this chapter). If there are barriers to these posts for the most skilled and qualified candidates, who may be women, this amplifies the problem that Ukraine is facing when it comes to capable leadership. Creating an environment in which women and men are equally represented at senior levels is a priority of NAUCS. The Agency has set a goal to increase the percentage of women in senior posts to 40% by 2030. This goal is also actioned through ensuring that more spaces in leadership development programmes are filled by women, to resolve barriers in the development pipeline.

Toward adherence with the OECD Recommendation on Public Service Leadership and Capability (PSLC)

This work uses the principles of the *OECD Recommendation on Public Service Leadership and Capability* (PSLC Recommendation)[3], shown in brief below Figure 5.3), as an analytical framework to identify key areas of Ukraine's public administration on which to focus more deeply. The 14 principles that make up the Recommendation outline elements of an ideal and high-functioning public service. The PSLC recommendation is a legal document, integrated into OECD standards for the public service. The Recommendation was developed in consultation with OECD countries as well as other actors. OECD member countries agree these standards and commit to implementing policies and reforms to form a public service that abides by the principles.

The chapter's analysis specifically highlights the most relevant Principles of the PSLC Recommendation that can be targeted to strengthen Ukraine's public service and support its readiness for the future. These include Principles 2, 5, 8 and 11, which focus on skills and competencies, leadership, learning and development, and workforce strategy. However, it is vitally important to note that the Principles are mutually reinforcing, and the PSLC Recommendation should be considered as a reference source throughout this chapter, and also for alignment with OECD standards.

Figure 5.3. OECD Recommendation on Public Service Leadership and Capability

14 Principles that define a high-functioning and future-ready public service

Source: OECD, Recommendation of the Council on Public Service Leadership and Capability, OECD/LEGAL/0445

Building on the SIGMA Monitoring Report: "Public administration in Ukraine: Assessment against the Principles of Public Administration"

The work in this chapter of the OECD Public Governance Review of Ukraine builds on extensive country-specific work undertaken through the joint EU-OECD initiative Support for Improvement in Governance and Management (SIGMA). Housed within the OECD structure, SIGMA has been working with specific partner countries, including Ukraine, since 1992. In 2023, SIGMA assessed Ukraine's administration against the SIGMA Principles of Public Administration (OECD, 2023[2]),[4] and published a subsequent Monitoring Report (OECD, 2024[3]).[5] [6]

The Monitoring Report found (focusing on the duration between 2020 and 2023) that Ukraine's civil service had experienced significant disruption due to Russia's war of aggression and the imposition of martial law. Core administrative processes, including recruitment, promotions, transfers, and dismissals, were altered, reducing adherence to merit-based practices. Financial constraints led to a decline in funding for salaries and training, weakening both workforce performance and institutional resilience. The NAUCS took steps to improve human resource management, but uptake of key tools, such as the Human Resource Management Information System (HRMIS; discussed more in this chapter) was limited. Further findings from the Monitoring Report include the implementation of competitive, merit-based recruitment, required under the Civil Service Law, was largely suspended, initially due to COVID-19 and later martial law. While certain institutional improvements were made, such as the establishment of the Center for Evaluating Applicants for Public Service Positions, recruitment standards deteriorated, and civil service turnover remained high. The management of the senior civil service was weakened by political interference and the erosion of competitive appointment procedures. The salary structure continued to lack transparency and fairness, and reform allowances proved fiscally unsustainable. Though progress had been made in professional development since 2018, promotion processes during martial law discouraged advancement. The disciplinary system remained mostly unchanged, though new procedures were introduced under martial law. Notably, experiences and perceptions of corruption had improved, but the suspension of asset declarations and delays in adopting the Anti-Corruption Strategy marked setbacks in maintaining integrity and oversight.

Where the scope of this chapter in the Public Governance Review aligns with elements of the SIGMA assessment, this work seeks to build on the work conducted while citing relevant findings, without duplicating analyses or limiting the conciseness of this work. Therefore, throughout this document, reference is made to SIGMA's conclusions and recommendations, which can be referred to for more detail

and to understand the indicators and depth of analysis that supports and comprises them. This chapter particularly builds on the SIGMA Monitoring Report under the scope of Principle 6,[7] which states that the professional development of public servants is ensured through elements such as training, growth opportunities and performance management.

The urgent importance of performance- and merit-based selection through a transparent process

SIGMA's work (discussed above), and the Principles of the PSLC Recommendation, pertain to using merit-based and transparent selection and promotion methods. These principles are of utmost importance to the scope of the work in the chapter and for the alignment of Ukraine's public service with international standards and good practices. The recruitment and promotion of civil servants based on performance and merit is an integral element of a properly functioning and future-ready public service. These practices help ensure that the best employees are selected, retained and developed to work in the difference-making roles inside administrations. This chapter discusses the issue, and its importance should not be understated. However, the subject is not developed as extensively as it would otherwise be in the absence of the work by SIGMA, which has thoroughly analysed and provided recommendations on the matter.

Ukraine's public service had not traditionally had a system of full merit-based or transparent competition for roles. However, many improvements to establish such a system were introduced by the *Law on the Civil Service* (LCS) in 2016 and were being implemented up until the COVID-19 pandemic, when open competitions were suspended through a special amendment to the LCS.[8] The process was reinstated after the pandemic, however soon after the end of the COVID crisis, Russia's full-scale invasion of Ukraine began, and Martial Law was implemented. This again halted progress towards merit-based recruitment, given that Ukraine's Law on the legal regime of Martial Law stipulates that in times of Martial Law, civil service positions can be filled without any competitive process.[9]

A resumption of competitions, starting in summer 2026, has been proposed by NAUCs. It provides a yearlong period for launching competitions for posts filled during the Martial Law, but also allows such civil servants to see their status converted into open-ended under certain conditions, without undergoing open competitive processes. This reform also slightly improves the procedure by removing political appointees from the Commission for Senior Civil Service, adding field experts to its composition, and extending deadlines for application. It is a positive step towards merit-based and transparent entry into the civil service and is better aligned with the SIGMA Principles of Public Administration. However, there are also limitations, including the extension of shortlisting of candidates to categories B and C (classifications below executive level), giving unnecessary discretion to appointing authorities, or introducing personnel reserve (allowing candidates who are not selected to be appointed to other positions without a competition). Furthermore, there are challenges to the reform's passing and implementation, such as lack of comprehensive data – which itself is an issue resulting from the HRMIS system not yet being a mandatory system for all public administration institutions (although a schedule is in place to achieve this in the medium term). In addition, amending primary legislation is only the first step to an improved model of merit-based recruitment, as many important details are to follow in secondary legislation and guidelines, and of course in the practical implementation.

Given the Principles regarding merit-based selection contained in the PSLC recommendation, and those in SIGMA's Principles of Public Administration, *a continued recommendation of the OECD to Ukraine is to fully resume merit-based recruitment and open competitions as soon as security conditions permit.* This strong recommendation stands and should be emphasised even in the absence of extended analysis on the topic in this specific report.

Recent reforms to public servant salaries are intended to reduce turnover and address attractiveness

Salaries in Ukraine's public service have been uncompetitive against the private sector. Partly as a result, turnover rates in Ukraine's public service are increasingly high, and tens of thousands of positions go unfilled. While these issues are linked not only to salaries but also to other factors related to the overall attractiveness of the public service in Ukraine, the current administration has started a major reform targeting salaries and job classifications (Governement of Ukraine, 2022[4]). It aims to further classify positions within the civil service and in turn reform salaries based on these classifications. The law was signed by President Zelensky in June 2025, following the implementation of a transitional pilot period in 2024 and a second reading in March 2025.

For some classifications, the reform brings salaries in line with certain private sector positions, though in other cases, particularly outside of central government, staff may actually see a decrease in wages. 50% of civil servants reported a salary increase due to the reform, while 28% noted a decrease, and 22% experienced no significant changes (The Agency for Legislative Initiatives, 2024[5]; NAUCS, 2024[6]). The reform changes the structure of pay to increase many base salaries and to stop allowing for non-transparent bonuses awarded at managers discretion.

OECD/SIGMA has provided an opinion on this reform, pointing to some positive steps but other significant shortcomings. The reform was long-discussed and saw around 125 amendments and proposals in the years it spent passing through the legislative system. It remains to be seen whether the salary adjustment functions as intended and can stem the high turnover rates within Ukraine's public service.

Priorities moving forward for the future of Ukraine

Given the context and discussion presented above, it is evident that Ukraine's public service stands at a pivotal moment. While it has shown remarkable resilience and commitment under the pressures of war, underlying structural and skill issues remain that must be addressed to ensure long-term capability and effectiveness. As highlighted by the SIGMA Monitoring Report, disruption to recruitment, promotions and workforce management during the war has undermined institutional development. At the same time, the OECD's Recommendation on Public Service Leadership and Capability stresses that a high-performing public administration relies on strong leadership, a skilled workforce and systems that foster continuous learning and strategic workforce management.

In this context, this chapter focuses on three future-oriented priorities that are essential for supporting Ukraine in building a capable, durable and resilient public service. These areas of focus align closely with the OECD Recommendation and respond directly to the challenges and gaps identified by SIGMA. Specifically, the chapter expands on strengthening learning and development systems, identifying and prioritising the most-needed skills, and establishing and embedding human resource processes and practices that reinforce and sustain the previous two elements. These priorities provide a practical and strategic foundation for shaping a public service through recovery and into the future.

5.2. Analysis: Developing a strong, capable and resilient public service for the future of Ukraine

Ukraine's public service faces challenges in building its overall capacity and depth of skill across the workforce. Currently, the most capable staff can be over-extended, and the recruitment of new skilled staff is a major challenge. As a result, Ukraine relies on external assistance and technical support to bridge many of its current workforce gaps (OECD, 2024[3]). For the future of Ukraine and its long-term independence, and to align with international good-practice, it is vital that the capacity for a future-ready and high-performing public service is found internally with the country's own workforce.

Therefore, there is an urgent need to actively and systematically upskill and develop the country's public service workforce. Development opportunities and policies can create capacity among the existing workforce and make the public service more attractive to new recruits.

This section introduces three elements of workforce skill development that work together to build a future-ready and capable workforce: strong learning and development systems, strategic targeting of the right types of skills, and human resources practices that reinforce learning and performance by employees. The section reviews these elements in the context of the Ukrainian public service.

Strengthening learning and development systems across the Ukrainian public service

To create a resilient and future-ready public service, Ukraine must continue to institutionalise a sustainable learning and development framework that meets evolving needs, supports international and EU integration, and fosters continuous professional growth.

Sourcing needed skills at the hiring stage is a large challenge for the Ukrainian public service. The overall attractiveness of the public service (often when compared to salaries available in the private sector) can hinder the recruitment of the most skilled workers, though this is a problem faced by the many OECD countries and governments globally. The attractiveness of the civil service in Ukraine may be further hindered by a recruitment process that is currently not based on merit, is not transparent, and is not always perceived by the population to be fair. The absence of these systems does not aid in improving negative perceptions of corruption around the attainment of senior roles (more on this can be found in the *OECD Integrity and Anti-Corruption Review of Ukraine* (OECD, 2025[7]).

In Ukraine, additional problems are faced in sourcing skills due to several factors beyond attractiveness. These include a population decrease during the war and the relative abundance of complex problems that must be addressed through the public service, and an overall shortage of needed skills generally in the overall workforce (even outside of the public service). In the Ukrainian public service currently, many roles are left unfilled due to an inability to find qualified people for the roles.

This problem creates an urgent impetus to develop needed skills internally, through advanced and thorough learning and development (L&D) strategies, rather than to rely too heavily on sourcing skills at the recruitment stage, as outlined in this section of the chapter.

Box 5.1. International example: Prioritising workforce development over recruitment in Thailand's civil service

Thailand is an example of a country that is finding itself in a needed shift towards prioritising the development of its existing public service workforce, given challenges in attraction. In previous decades, the country's Royal Thai Scholarship Programme functioned as a very attractive offer for the best talent in the country: candidates would have their education abroad paid for by the Thai government and then return to launch their careers inside the administration. However, with a rapidly advancing economy and attractive options in the private sector, this programme is no longer functioning in the same way and attractiveness of the public sector in Thailand is at much lower levels. Thailand is struggling, just like Ukraine, to fill roles, limit turnover, and find skilled workers.

In 2024, the OECD conducted a Public Service Leadership and Capability (PSLC) review of Thailand. This work analysed the entirety of the country's public service against the principles of the recommendation. Among the top findings was a clear need for Thailand to shift its efforts and reliance away from being able to source the best in the country at the initial recruitment stage, and towards increased efforts to develop the skills and careers of existing staff. This can help the existing workforce gain more skills and become more capable, as well as provide growth and fulfilment to staff to reduce turnover and increase motivation.

Following the OECD's review, Thailand has begun to implement recommendations related to this goal. They are increasing the resources going towards the Civil Service College, and other learning and development initiatives. They have also shifted staff resources to put highly skilled leaders in charge of the L&D portfolio. Further, they have developed several competency frameworks, and initiated more strategic analysis of skills needs. In turn, they have designed and expanded learning curriculum around these. Thailand has also increased its efforts on international collaboration and sharing on this front, for example by becoming involved members of the OECD Network of Schools of Government (NSG).

Source: OECD PSLC Review of Thailand, 2024 (forthcoming in publication)

Ukraine is developing a co-ordinated, well-aligned and long-term strategy for public sector learning and skill development

In recent years, Ukraine has recognised the need for a more substantive role for learning and development within its public service and has begun to make several advancements in this area. Chief among these is the revitalisation of its school of government, the High School of Public Governance (more on this in the box below), as well as the Center for Adaptation of the Civil Service to the Standards of the European Union (Center for Adaptation of the Civil Service to the Standards of the European Union, n.d.[8]).

An institution under the umbrella of the NAUCS, the High School leads government learning efforts and is responsible for implementing much of the learning strategy and action plan for Ukraine's public service, which were established in 2023 and cover until 2027.[10] The High School implements professional development programmes and training for civil servants, and is currently frequently adding to its catalogue to try to ramp up the learning offerings available in Ukraine. Following the resumption of competitions for public service roles, the competition procedure is intended to be held partly at the Center for Evaluating Applicants for Public Service Positions of the High School of Public Governance.[11]

The Center for Adaptation of the Civil Service to the Standards of the European Union also provides some training as part of its role as a research hub and resource centre that collects and analyses data for the

integration of Ukraine to the EU. It also partners with partner institutions, including OECD SIGMA, to expand its range of training and expertise (Principles, n.d.[9]) ((JDS), n.d.[10]).

The National Agency of Ukraine on Civil Service (NAUCS, discussed previously) sets training standards and mandates, and approves advanced training programmes.[12] It also oversees competitive selection for any external training providers and is tasked with ensuring compliance and alignment with the strategy and action plan mentioned above. The NAUCS has also established a communication and information system to give information on training to public servants, called the Knowledge Management Portal. This system attempts to catalogue the learning offerings available, especially those provided online, of which there are around 1700 on offer – however it does not provide any online learning itself. The Knowledge Management Portal provides electronic interaction between the Portal's users (public servants, state and local self-government bodies, and educational service providers). More than 7 000 state and local self-government bodies representing human resources management services are registered on the platform, in addition to 168 providers of educational services (higher and postgraduate education institutions, international technical assistance projects/programmes) who can post professional development programmes that they offer.

For online learning, there are several resources. Studiya (or *StudyiЯ*) is a specialised educational platform for the training and development of public servants, created by the High School of Public Governance. Still growing, it was platform was launched in November 2024 and as of August 2025, 22 504 public servants have registered on the platform, which hosts 43 courses. Additionally, the Ministry of Digital Transformation has developed and runs Diia.Education, a state portal for digital education available to public servants and which offers and hosts several trainings (at time of publication, there are 24 educational series relevant to civil servants). Other online resources used for learning in other areas include Moodle, Coursera, Prometheus, Udemy, and more. This expansion of digital learning resources has highlighted some challenges, primarily in forming a single, large-scale integrated digital learning platform purpose-built for the public service en mass – however, both Studiya and Diia.Education provide potential for a wider collaboration and dissemination by NAUCS, and for the ability to absorb or categorise the wider network of available offerings.

Access to online training can be unequal across different staff and roles in the administration. HR officials from regional and frontline bodies report difficulties in scheduling, connectivity and allocating staff time for digital learning. Greater coherence in digital infrastructure and stronger user support mechanisms could enhance both reach and impact.

Box 5.2. Ukraine success story: Unique training for Chief Digital Transformation Officers

In 2020, the Ministry of Digital Transformation of Ukraine established the position of CDTO – Chief Digital Transformation Officer. These staff are embedded within government bodies and are responsible for leading and implementing digital transformation across all areas of Ukrainian public life. Special training was created for these staff through "CDTO Campus", an initiative dedicated to preparing CDTOs and their teams to be digital leaders capable of implementing innovative technological projects within public administration. Campus programs offer specialised education in GovTech, cybersecurity, and artificial intelligence, all tailored to the evolving needs of modern public governance. Campus instructors are experts with hands-on experience in leading digital transformation initiatives in the public sector, and course collaborations exist with Microsoft, Cisco, and AI HOUSE.

After a year of operation, CDTO Campus has implemented 12 training programs and more than 440 staff have completed the training. Further opportunities exist to train and upskill CDTOs, potentially through mentorship or mobility exchanges. The goal is to ensure that the skill level of CDTOs is consistently high across all areas of the public service, in order to ensure full implementation of digital and AI goals and initiatives.

Ministries and other state bodies also offer their own specialised training in-house. The Ministry of Economy and the Ministry of Digital Transformation are two examples. This is done because staff inside these ministries need specialised skill development and the expertise for these is found inside ministries or the need is specific to the Ministry. Sometimes, as it the case for the Ministry of Digital Transformation, a Ministry may offer its expertise or learning offerings it has developed more widely, for the benefit of the larger public service. This is frequently done in collaboration with the High School.

For the oblasts, there are regional training centres, founded and operated by oblast state administrations and sometimes in co-operation between regions and some city councils. These operate to provide on-site training for public servants outside of the capital region, though they can also provide some online or blended formats.

Ukraine has also aligned itself with outside technical support and international partnerships to buttress its learning offerings and development plans. Topics where this has happened include cyber security, foreign languages, and leadership development.

Box 5.3. Ukraine success story: Building capacity through learning: Revitalising Ukraine's High School of Public Governance

As Ukraine undertakes the complex task of reforming its public service in the context of war and European integration, the expansion and revitalisation of the High School of Public Governance has emerged as a critical pillar of institutional development. Established in 2022 as part of implementing the PAR strategy, the High School is now intended to be the main institution for the training and upskilling of public servants, including those in senior leadership roles. It now delivers a wide range of programmes aligned with current national priorities, including digital transformation, resilience, strategic planning, and EU accession.

The High School has multiple specialised centres, including those focused on:

- digitalisation of professional training and development
- assessment of candidates for civil service positions
- development of managerial competences
- professional development in the field of regional development and local self-government and the restoration of Ukraine
- human rights
- European and Euro-Atlantic integration
- professional training in innovative tools and technologies in public administration
- learning the official languages of the European Union and improving professional competences in the state language.

The High School manages national training platforms and has recently expanded its online course offerings. Crucially, it benefits from a renewed and committed leadership team, alongside a growing cadre of expert staff, many of whom are themselves public servants with practical experience. They aim to ensure that content remains timely, relevant, and responsive to real-world needs and can make a tangible impact on overall capacity growth.

This internal capacity has also helped the High School to respond rapidly to emerging demands, reinforcing its role as the national source for continuous learning. Emerging topics are also increasingly the responsibility of the High School. For example, an initiative – begun by Ukraine's First Lady – focusing on mental health for civil servants who are suffering from effects of the war is being developed within the High School's curriculum. This is linked to efforts to provide jobs within the civil service to veterans, while providing needed support – both to veterans themselves and to HR personnel to accommodate their needs.

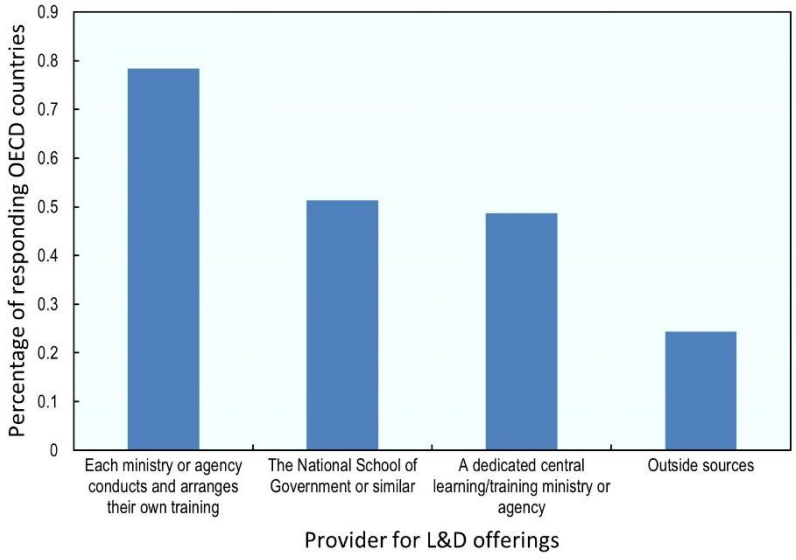
While challenges remain, such as staffing gaps and limited resources, the High School's development represents a significant step forward. Its flexible, targeted approach marks a shift toward a more professional, learning-oriented public administration. The presence of skilled educators and effective leadership within the High School sends an important signal about the value placed on learning in Ukraine's reform agenda. By embedding a stronger culture of development and focusing on the practical competencies needed for EU integration and post-war recovery, the High School is helping to equip Ukraine's civil service with the skills required for the future.

Ukraine's recent efforts to strengthen its system for public sector learning and development reflect a growing recognition of the strategic importance of skills in driving reform and resilience. The revitalisation of the High School of Public Governance, alongside the development of a national learning strategy and action plan, represents a meaningful step toward building a more capable, professional public service. The

institutional architecture is taking shape, with the NAUCS providing central oversight and the High School taking on a leadership role in training delivery. A permanent advisory body on training[13] also exists under the NAUCS, which supports formation of related state policy, coordination between NAUCS and other stakeholders, and development of proposals on legislation about training.

This approach aligns well with models observed across OECD countries, where a mix of central coordination and decentralised delivery is common, as illustrated in the figure below. Across the OECD, countries are found to structure their overall learning systems in various ways, and there isn't necessarily one right way. However, Ukraine's decision to re-establish its school of government places it among the 50% of OECD countries with a dedicated training institution, and functions as a sign of long-term commitment to capacity building.

Figure 5.4. Responsibility for learning and development in central governments, OECD countries, 2022



Note: N=37. More than one answer was possible. Original question: "Who is in charge of carrying out training and learning across the central/federal administration?".
Source: OECD (2022), Survey on Public Service Leadership and Capability, Module 5 on Learning and Development

At the same time, the fragmented nature of the system could present a challenge if not managed well. With learning delivered through a variety of actors – including ministries, regional centres, external providers and international partners – ensuring coherence, quality and alignment with national objectives will require continued coordination and oversight as well as ongoing mapping of training offers with analysis of gaps and overlaps. It is also important not to rely too heavily on outside expertise, although there are cases and subject areas where this is more than warranted.

An important task for Ukraine and the NAUCS will be ensuring that its learning offering are coherent and well-managed from an over-arching point of view, as the strategy around learning continues to expand and the trainings on offer adapt alongside. This is a large undertaking, as it requires not only a systematic view of what courses and development opportunities need to be offered, but also what organisations are best placed to offer them and which staff to target, which itself requires skills needs analyses and performance evaluation assessments. It should not be underestimated just how big of a task this level of management and mapping is, and the impact that an exceptional learning and development system and strategy can

have on an administrations capacity. Because of this, it is important that there is a long-term buy-in from the highest levels for a resourced, prioritised and well-implemented workforce development strategy.

Box 5.4. International example: Creating an overall learning system for the public service in the United Kingdom

The UK government undertook a comprehensive reform of its public service learning and development system through the Government Campus and Curriculum (GCC) initiative. This large-scale strategy, launched in 2021, aims to professionalise the civil service by integrating all training, learning, and development efforts under a single, coherent framework. The GCC provides structured career development and ensures that all 450 000 public servants have access to high-quality learning opportunities tailored to their roles and career stages.

The GCC is designed around five key learning strands, the “Curriculum” element:

- Foundations of Public Administration – Core skills such as digital literacy and personal effectiveness.
- Working in Government – Understanding public finance, governance, and policymaking.
- Leading and Managing – Managerial and leadership development.
- Specialist Skills – Professional training aligned with specific government professions/roles.
- Domain Knowledge – Expertise in key policy areas and ministerial functions.

The "Campus" element of the GCC expands access to learning through a hybrid model, combining in-person training, online courses, and external learning platforms. This approach lowers barriers to training, promotes interdepartmental collaboration, and makes better use of government facilities and resources. By integrating learning across ministries, the GCC fosters cross-government networking and knowledge sharing, and importantly, allows training to be delivered by specialist areas.

A key ambition of the GCC is to leverage data and technology to personalise learning, track workforce skills, and identify training gaps. Plans include developing a skills database to catalogue employee competencies, allowing the government to quickly deploy expertise in times of crisis. Advanced analytics will also be used to measure training effectiveness, enhance course offerings, and improve workforce planning.

The UK government has prioritised sufficient resourcing for the GCC, with an estimated £300 million annual investment in L&D. The initiative is committed to continuous improvement, with a focus on embedding learning into public service culture. By modernising its training infrastructure and balancing digital with in-person learning, the UK aims to create a public service ready for the future.

Source: (OECD, 2023[11]).

Thinking even more broadly about more informal methods of learning and development can benefit the overall learning strategy and its outcomes

Effective adult learning is about more than only formal class- or course-based education. More and more, public administrations are embracing the full scope of how adults learn and incorporating these methods into overall learning plans (OECD, 2023[11]). In Ukraine, expanding the scope and scale of the total learning and development package holds substantial potential for making large strides in skill and capacity development. This means taking full advantage of things like informal and experiential learning, digital tools, and mobility opportunities.

Ukraine's public administration reports to be increasingly incorporating informal and experiential learning into its broader development agenda, though the degree of strategic integration remains limited. Public servants are encouraged to complete a portion of their annual training credits through self-education, and institutions such as the High School of Public Governance now include elements like team-based problem solving and peer exchanges in their programmes. In practice, informal learning also takes place through participation in cross-sectoral task forces, such as those related to EU accession or collaborative planning, though this does not reach the majority of the public service workforce. It also happens through exposure to complex, real-time challenges, of which Ukraine currently faces many.

Some on-the-job and informal learning, for example participation in experience-sharing events and workshops and certain mentoring programmes, are recognised in Ukraine's L&D structures and formalised in Ukrainian legislation as self-education.[14] Self-education can encompass many learning initiatives that are not part of the formal training offerings/curriculum but can still be recognised and awarded European Credit Transfer and Accumulation System (ECTS) credits (discussed further below). This represents good progress towards a well-rounded learning system. However, many types of these valuable informal learning experiences are not yet systematically incorporated within Ukraine's learning offerings and frameworks, as learning strategies offered by the administration focus predominantly on formal, course-based methods. Therefore, Ukraine can benefit from incorporating informal learning – such as through participating in networks, working on cross-sectoral teams, taking up temporary leadership roles on projects, or systematically sharing learning moments with colleagues – into its overall learning strategy.

Box 5.5. International example: Informal and experiential learning as part of executive learning strategies in Singapore and The Philippines

Singapore and The Philippines are two examples of countries in which universities responsible for educating public service leaders, or future leaders, are now incorporating informal and experiential learning into their overall strategies and courses.

In Singapore, the Institute for Governance and Leadership at the Lee Kuan Yew School of Public Policy (LKYSPP) is using a 70:20:10 model of learning for structuring much of the training they offer. In the model, 70% of learning and development happens through experience, 20% happens through others (often by observing how others do things), and only 10% happens through classroom or similar courses or programmes. Because of this, LKYSPP has designed its Senior Fellowship in Public Service programmme to train leaders by a hands-on and experiential approach, putting them in action-oriented situations where they learn by doing alongside others, and have structured opportunities to reflect on what they learned. The whole programme is still strategic, structured and organised, but is not held in a traditional classroom format.

In The Philippines, at Ateneo School of Government, there is a growing focus on providing more informal training and "microcredentials" to upskill public servants on complex emerging subjects, including AI and new technology. There is also a call to better train public service leaders to manage in a multigenerational workforce, which has included a deepening of mentorship programmes. This has been partially in response to a recognised need to educate public servants differently than traditionally had been done, so that they contend with new and different modern policy challenges. The Philippines, like many countries in the region, is experiencing a rapid increase of young workers, with new and different skillsets and different perspectives on ways of working. This has an impact on the public service workforce, and also on the broader societal policy challenges they must respond to.

Mobility is another related and large-scale learning method, that within Ukraine's public service has yet-untapped potential. While the legal framework allows for temporary assignments, secondments and internships, including opportunities abroad, it is not common for this to happen frequently in practice. The

war has however provided some newer examples of this happening. For instance, the reassignment of staff to support administrations in regions led to on-the-ground learning and crisis management experience. Yet, these practices are not leveraged as part of a broader development strategy. Data on mobility is limited, and HR systems do not currently track or incentivise internal movement as a learning mechanism. More structured and utilised mobility schemes – including rotation programmes, short-term exchanges, and micro-assignments – could provide a low-resource but high-impact means of professional growth and learning.

Box 5.6. International example: Promoting mobility in the Belgian civil service

The Belgian civil service has implemented various mobility programmes to promote the movement of public servants within and across organisations, as well as between different governmental levels. They aim to develop skills and competencies among public servants while allowing the workforce to be restructured according to both short-term and long-term demands. Mobility programmes in the Belgian civil service increased flexibility, and streamlined hiring processes, particularly for hard-to-fill positions. There are existing programmes for both longer-term and temporary mobility.

Longer-term mobility in the Belgian civil service is categorised into three types:

- Internal Mobility: Within the same organisation. Opportunities are usually published internally, with larger organisations finding this system more effective compared to smaller ones.
- Intra-federal Mobility: Between organisations within the federal administration. Vacancies are posted on an internal website, creating an internal market for job opportunities. This channel simplifies hiring compared to external recruitment and is more ad-hoc.
- Inter-federal Mobility: Between different governmental levels. This only accounts for less than 1% of mobility cases due to the differing reward systems and potential relocation costs.

Temporary mobility allows the public sector to react flexibly to urgent, short-term needs, such as during health crises like the COVID-19 pandemic when one organisation saw 97.3% of new hires coming as temporary staff from other areas of the administration. Belgium has several programmes for temporary mobility, notably:

- Special Federal Forces: This programme addresses urgent temporary needs for specific assignments or projects. Opportunities are announced through a launch call followed by a simplified selection process.
- Talent Exchange: This programme enables the exchange of employees at all levels across from federal to provincial services for 6 to 18 months.
- Human resources units and internal communication and play crucial roles in promoting these mobility programmes, and managers are expected to encourage staff to use them. Additional support includes career guidance and career coaching provided by the federal career centre.

Reinforcing motivations for development and maintaining a learning culture can become a strategic long-term priority

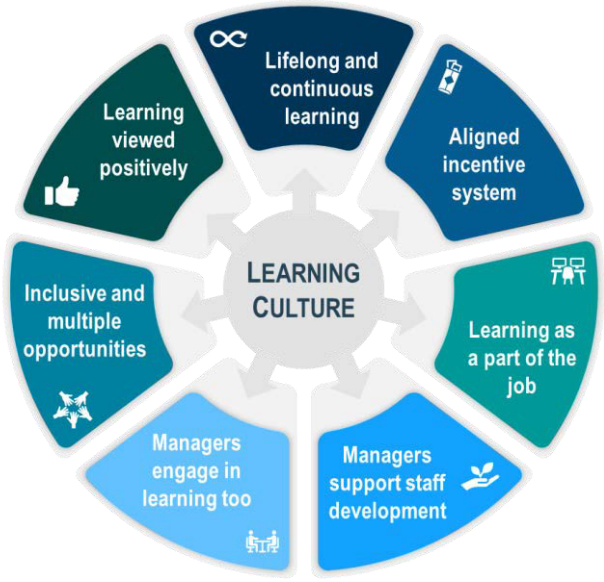
Another challenge for learning in Ukraine is that access to high-quality learning opportunities can be uneven across the administration and constrained by multiple factors. While participation in training is formally linked to performance evaluation to some degree, and a minimum threshold of European Credit Transfer and Accumulation System (ECTS) credits is required annually, in practice, many institutions struggle to release staff for learning due to operational pressures, alongside the very high workload on the most vital staff.

There may also not be enough capacity in certain high-demand courses. HR representatives have reported instances where course places are oversubscribed by three times their capacity. Access can be especially limited to regional bodies where online training isn't an option (or for courses which genuinely warrant in-person attendance). Furthermore, training budgets remain constrained, as the country's administration faces ongoing financial constraints (especially during the war). The system is also under pressure to expand access to senior-level development, particularly for strategic planning, EU integration, and resilience. Without sustained investment in both training supply and quality and the institutional conditions for participation, there is a risk that capacity gaps will persist despite the overall expansion of offerings. Addressing this will require stronger leadership accountability for development, targeted funding support, and continued efforts to embed learning into the everyday expectations of public service careers.

High-functioning and future-ready public services are generally ones with a high degree of job-relevant learning and development taking place throughout the career course. Countries that do very well at this have strong learning cultures. A learning culture encourages, supports, and rewards learning, shaping an environment where it's embraced and expected by employees, managers, and the wider organisation. When such a culture is in place, continuous development moves from being seen as a chore, an optional extra, or uninspiring, to being linked with personal growth, job impact and fulfilment, and career advancement. Learning is not only necessary and expected but, ideally, welcomed. Building a learning culture is a complex process. It involves more than just offering learning opportunities; it also requires the right structures, systems, and incentives (and removing disincentives) to allow and motivate employees to learn and apply new knowledge and skills in their everyday work.

Some of the elements that make up and exemplify a learning culture are outlined in Figure 5.5.

Figure 5.5. Elements of a learning culture



Ukraine is taking steps to build a learning culture in its civil service. Some learning is expected, with public servants required to complete at least one (1.0) ECTS credit of training per year, including a portion through self-directed learning. Learning needs are assessed to some extent by the NAUCS (more on this in the next section), and priority topics have included leadership development, digital skills, communication, and post-war recovery. Completion of professional development activities contributes to performance evaluations; civil servants must complete at least 0.4 ECTS credits through their individual learning plans, by the time of their evaluation, to receive the highest rating.[15] Managers are encouraged, to a certain

extent, to ensure staff take part in training, and there are some programmes for senior leadership development, including mentoring and thematic learning schools.

However, Ukraine still faces several challenges in embedding a stronger learning culture. While participation in training is formally required, the volume and depth remain limited, and learning is not yet built into everyday work. It could be unintentionally positioned as an optional or extra task, rather than a core part of professional responsibilities. OECD good practice would instead make learning integral to career development and performance expectations, through non-financial incentives such as evaluation feedback and promotion decisions. Managers are also integral to this: while managers are encouraged to support learning, most are not held accountable for team development. This can be addressed through providing support for managers to have the needed skills to undertake this team development, and through decisions about the selection for managerial posts.

Figure 5.6 shows how OECD countries manage the incentive mix for learning, to begin to build learning cultures. There is an emerging trend to tie learning to career growth, promotion decisions, and feedback – recognising the importance of making learning an expected part of the job. Importantly, very few OECD countries tie learning to any form of financial incentive.

Figure 5.6. Incentives for L&D used by OECD countries, 2022

Note: n=30, Question asked: "What types of incentives for learning and development are used?"
Source: OECD (2022), Survey on Public Service Leadership and Capability, Module 5 on Learning and Development

Research in Ukraine highlights some barriers that limit progress and can be addressed to build a stronger learning culture over time. Time and scheduling remain a key issue, because the busiest public servants struggle to attend training without compromising core duties, especially during the current situation in Ukraine. While regulations cap training funding at no more than 2% of the payroll fund, current (2025) spending on learning is around just 0.1%, due to financial constraints stemming from the war.

Further, incentives are not clearly tied to career advancement. Interviewees also pointed to resistance to change, a lack of motivation to engage in training in some cases, and concern or hesitation around adopting new technologies and upskilling for new positions. Some things to consider could be flexible scheduling and backfilling to accommodate important training and signal its necessity, clearer career-related rewards for development, and continually stronger support for learning at the organisational level.

Additionally, management should be held accountable for developing their staff, and indeed themselves continually and visibly partake in training. Addressing these gaps will be critical to building a public service in Ukraine, where learning is not only encouraged, but expected and supported as part of everyday work.

Ensuring stability and institutional support for learning is key to the development of a highly capable public service workforce

Following the above analysis, it becomes paramount that Ukraine's learning and development systems are given long-term support and buy-in from leadership, related institutions, and legislative structures. Ensuring stability and strong support for learning and development in Ukraine's public administration is both a strategic priority and an ongoing challenge. While progress has been made – particularly with the adoption of a national learning strategy and the revitalisation of the High School of Public Governance – implementation capacity remains uneven and financial resources directed to training are reportedly not high enough to address all needs.

Staffing is one key constraint. institutions responsible for training, such as the High School and regional training centres, report persistent vacancies and difficulty attracting and retaining qualified staff, particularly outside the capital region. Capacity and skill issues are compounded by limited and often unstable funding streams, which restrict the ability to plan for the long term and deliver learning at scale or to respond flexibly to emerging needs. Without predictable investment and sufficient staffing, the system risks over-reliance on a small number of individuals and institutions, or external providers and piece-meal technical support, undermining resilience, independence and sustainability.

Leadership prioritisation and organisational buy-in are both important for Ukraine going forward. Although NAUCS plays a central role in long-term strategy, coordinating learning and monitoring compliance, the degree to which learning is embedded in institutional cultures varies. In some ministries and local authorities, training is treated as a formal requirement rather than a strategic tool, with staff development plans left incomplete or inadequately resourced. Leadership turnover and competing operational pressures can further reduce attention to workforce development. Strengthening institutional support for learning will require more than strategies and document on paper; it demands visible and consistent prioritisation by senior leadership, adequate and well-planned budgeting, and strong incentives for participation ideally within an overall learning culture. Embedding learning within performance frameworks, linking it to career progression, and holding managers accountable for team development could help embed learning as an institutional imperative for the future of Ukraine.

Identifying and Focusing on the Most-Needed Skills for a Future-Ready Ukrainian Public Service

In a circumstance of ongoing, urgent, and competing priorities, innumerable skill types are being called upon in Ukraine and will continue to be in the future. While a heavy emphasis on workforce capability development is warranted, certain skillsets are even more urgently needed that others. With finite resources, both in terms of employee time and the feasible ability to design and offer effective learning opportunities, Ukraine's learning and development strategy must place particular emphasis on the most-needed skills to have maximum impact for the future of the public service.

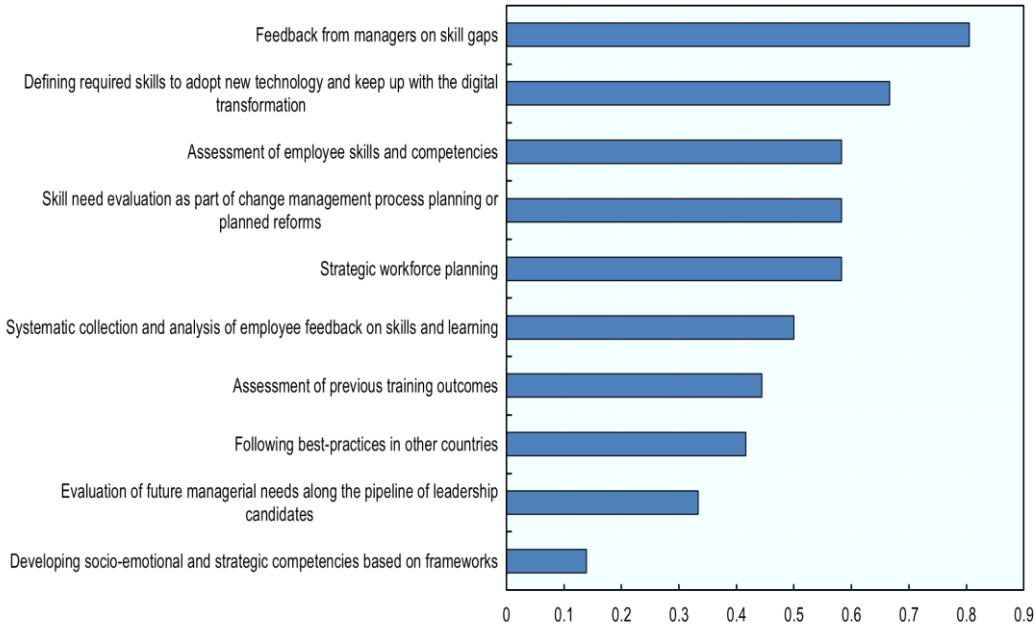
This section of the chapter discusses a preliminary analysis of these skill areas, beginning with a focus on more systematically identifying them in coming years to ensure a well-informed learning and development strategy that uses planning and foresight to address skill needs.

Strategically and systematically identifying the most needed skills can increase effectiveness of learning efforts and efficiency of resources

As Ukraine rebuilds and advances, its public service must prioritise developing the most urgently needed skills and critical competencies to effectively manage and address the challenges ahead. Under emergency measures during the war, certain skills were called upon more than others and some skillsets may have been delayed in ongoing development. Other skills may have been depleted when members of the workforce went to serve in the war and must be considered and evaluated as staff can return to the public service workforce. The capacity of departments can be evaluated compared to pre-war capacity, however the most needed skillsets were in need before the war as well – however will be even more essential in the post-war period, when the demands on high functioning of the civil service will be heightened.

The section below this outlines some of these areas, identified by OECD analysis undertaken through extensive discussion with public servants, their managers, and the executive level. However, this work is preliminary, and a more thorough and ongoing strategy for identifying skills needs in Ukraine is a key recommendation of this report. The figure below illustrates some of the methods for skill needs identification used across OECD countries.

Figure 5.7. Data and evidence use to identify needed skills, OECD countries, 2022



Note: Number of OECD countries, n=36 Question asked: How does your country's public service identify skills and competencies to prioritise for training?
Source: OECD (2022), Survey on Public Service Leadership and Capability, Module 5 on Learning and Development

The figure points to a tendency for countries to seek feedback mostly from managers, and to rely heavily on these perspectives rather than also including other more strategic or systematic methods, such as via workforce planning, assessment of actual skills or training outcomes, or seeking input from staff themselves. While these data show the number of OECD countries using each method, it is important to note that countries that are more advanced in this area are getting far more systematic and analytical about the data they use to identify skills gaps and are going well beyond sourcing feedback from managers. For

its part, Ukraine reports to use all of the above strategies for skill identification except for two: strategic workforce planning and following the best practices of other countries.

One of the common methods used in Ukraine is the collection of feedback from state bodies on training needs through the questionnaire "Analysis of Needs for the Institutional Capacity and Staffing of Public Authorities" (hereinafter referred to as the "Analysis of Needs"). This assessment is conducted by the NAUCS and the Center for Adaptation of the Civil Service to the Standards of the European Union. A methodology for completing the questionnaire is available to state bodies. Within the specified timeframe, the state bodies submit the completed information to the Center and the NAUCS.

The Analysis of Needs is used to systematise the needs of state bodies for professional support in fulfilling Ukraine's international legal obligations in the field of European integration and to more broadly identify where skill development is needed. In its fourth year, it is conducted as part of the implementation of the Public Administration Reform Strategy for 2022–2025, and a report on the results is submitted to the Secretariat of the Cabinet of Ministers of Ukraine. The analysis follows a formalised methodology issued by NAUCS and was updated in 2024 to broaden the scope of the assessment, adding oblast administrations to the analysis as well as the Kyiv City State Administration.

The list of structural units involved in the needs analysis has also been expanded. Initially focused on structural units responsible for legislative harmonisation and general European integration coordination, the 2024 edition also includes units involved in the implementation of other international obligations and co-operation with development partners. This expansion has enabled a more comprehensive understanding of the staffing and institutional capacity landscape across public authorities including those more engaged in European integration. It should be noted that fulfilling requirements for accession into organisations such as the EU should not be considered as a matter for selected structural units, but rather as a global process that permeates the whole of the public administration. In this sense, in order to have a larger impact on integration, the Analysis of Needs can be used to enhance information for augmenting capacity across the civil service.

The Analysis of Needs plays a practical role in identifying existing skills and capacity gaps within the public service. Its findings indicate that while there has been a slight improvement in institutional capacity for the original two categories of units since 2023, the overall reported needs have increased. This rise is attributed largely to the methodological expansion, which has brought to light unmet needs not previously captured, but which already existed. Insights from the Analysis of Needs are useful input for strategic workforce planning and support better alignment between institutional responsibilities and staffing structures. Its continued implementation has the potential to inform targeted capacity development measures, helping to ensure that Ukraine’s public administration is adequately resourced to meet the growing and complex demands placed on it.

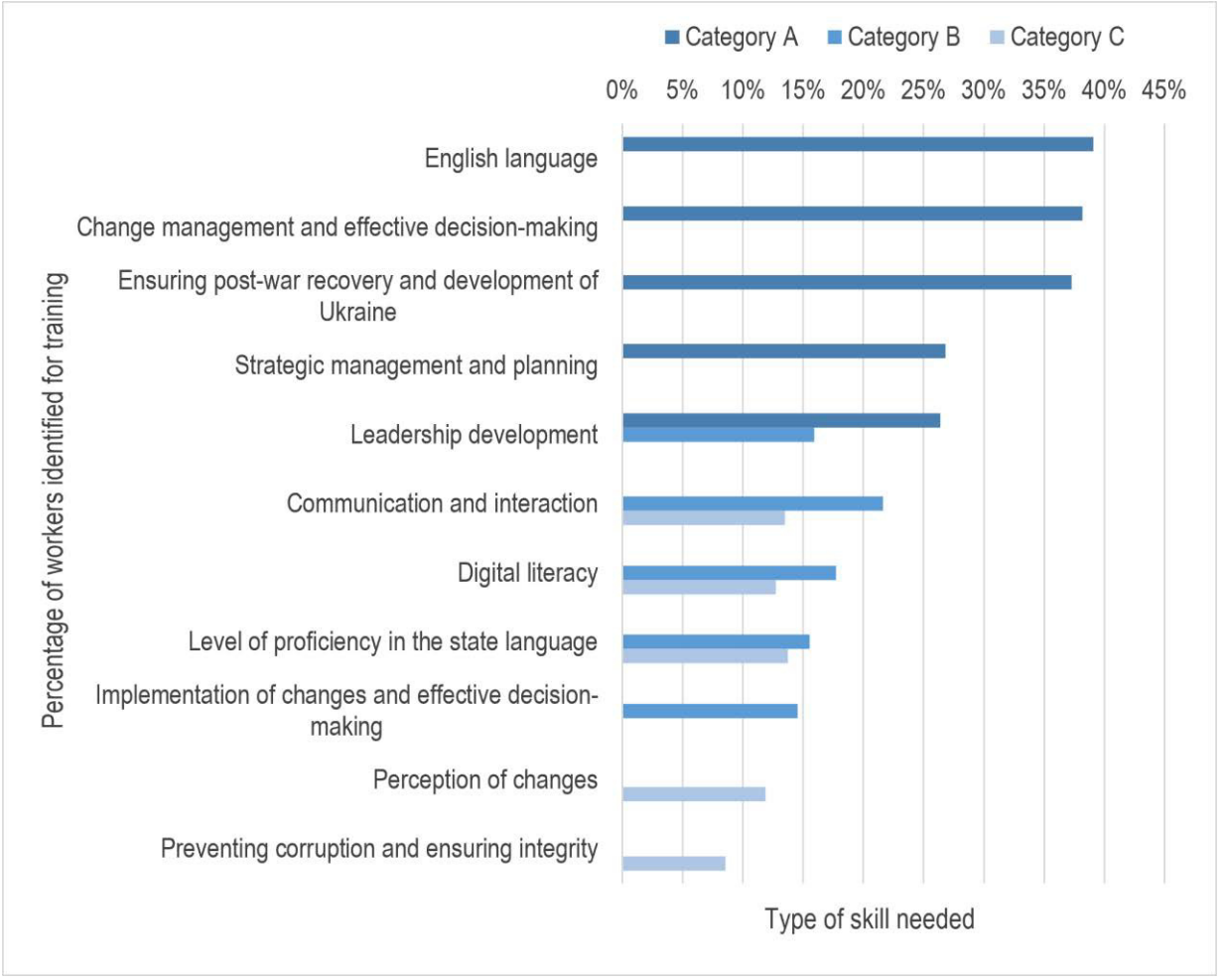
Information from the Analysis of Needs, on needed skills and on overall capacity, is then used to design learning offerings and decide on courses to offer, along with feeding into an overall report. Therefore, at present in Ukraine, skill needs identification in the public service – and the integration of findings into development strategies – is progressing, with large potential for expansion especially beyond the focus of EU integration, over time. The country could expand its number of data points to identify skills needs and on other aspects of learning, while also continuing to build up its use of data in overall strategic planning of the workforce. Data not only serve to enhance strategic decision-making and inform decisions but can also be useful in facilitating cultural changes and enhancing learning strategies, which contribute to the overall development of a workforce.

Prioritising key capabilities: Preliminary identification of five most-needed skills areas in the Ukrainian public service

OECD research has been able to identify certain skill areas where there appears to be a greater need for development in Ukraine. Several forms of evidence inform this preliminary outline of the most urgently needed skills, including fact-finding interviews with several levels of staff, a dedicated questionnaire, collaboration with country-expert colleagues within the OECD, and review of documents internal to Ukraine. *These areas are outlined in the following section*. It is important to note that this is not an exhaustive list, but rather a recommendation on areas to potentially prioritise in order to meet the immediate future needs of the Ukrainian public service as well as align with capabilities of benchmarked EU and OECD countries.

Ukraine has also identified priority areas to focus immediate learning efforts. The top five across each level of staff are displayed in the figure below. It is notable that many of these do align closely with OECD analysis, demonstrating a clear understanding in Ukraine of the impact enhanced development efforts are expected to have. Ukraine is also making an ongoing effort to evaluate the skills needed to type of positions and job classifications, making positive strides towards a skills-based method of workforce management and recruitment.

Figure 5.8. Percentage of public service workers identified as needing training across the top five priority skills, by each category of workers, Ukraine



Note: Skills identified by Ukraine officials who completed the OECD PGR Questionnaire. The question allowed to select only five answers for each category of employee. Ukrainian counterparts expanded on the available options, adding English language and post-war recovery as priorities among leadership, as well as perceptions of changes among category C staff. Perception of Change is defined by Ukraine as "the ability to accept change and transform (perception of strategic plans and goals, organisational changes in the organisation, etc.) and the ability to manage one's own 'resistance to change'."
Source: OECD Public Governance Survey to Ukraine 2024

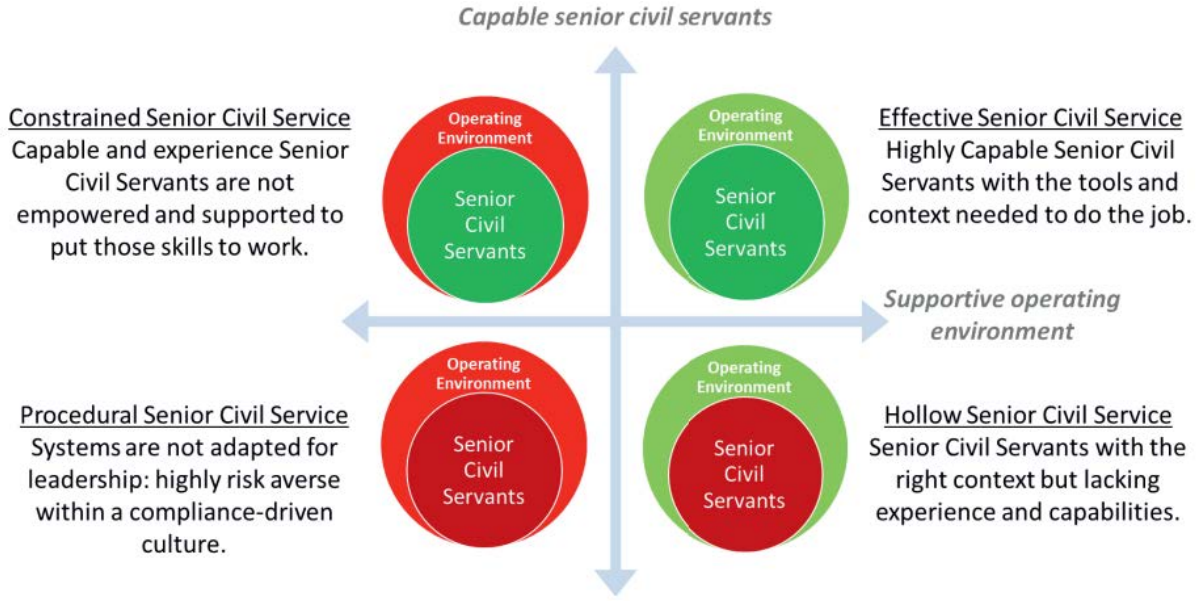
Leadership and strategic management for change and reform

Significant challenges exist in Ukraine in sourcing and retaining skilled leadership within the public service. Turnover in the public service is highest in management roles (OECD, 2024[3]), although the greater picture of the reasons behind this is unclear. For example, it is not always clear if people are leaving roles by their choice or because of a decision by the administration. Additionally, the previously mentioned complexities around Martial Law and having to fire and re-hire people for promotions is a further complicating factor in analysis. Nevertheless, advancements can be made on this front by addressing the procedures through which managers are selected, making it more merit-based and transparent so that hiring is done based on skill and performance. While this merit-based process is expected to resume and improve following the lifting of martial law, or the passing of a proposal to resume this earlier, work targeting the development of leadership and strategic management skills can also target the development of existing managers, or staff who may become managers through a leadership pipeline and the active identification of future leaders.

Ukraine has some procedures in place to support integrity of the senior civil service, through a questionnaire and background check for candidates for certain positions, which functions in collaboration with the national agency on corruption prevention. There are also high-level events and concerted efforts to publicise and signal the importance of integrity in the senior civil service. This can help ensure integrity and is a worthwhile and positive step to be recognised.

In addition to this, leaderships skills can become a larger focus. Skilled senior leadership is indispensable for an overall effective public service. However, it is important to note that the operational environment in which the executive groups works is just as important. Highly capable staff must be able to do their jobs with the tools and systems required, and function with appropriate degrees of autonomy – although, importantly, with the right accountability frameworks – while being endowed with advance decision-making and team-leading skills. The figure below is an OECD matrix that illustrated this concept, showing that the goal in an OECD senior public service is to function in the top right double-green quadrant, in which senior leaders are both highly skilled and working within an enabling operating environment.

Figure 5.9. OECD Senior Civil Service System matrix



Source: (Gerson, 2020[12])

Box 5.7. Ukraine success story: Leadership, collaboration, communication and community across oblasts in Ukraine

Strong, practical co-operation has emerged and developed between oblasts (first-level administrative divisions, of which there are 24) in Ukraine in response to the war. Regional administrations have demonstrated a high degree of solidarity, using both formal and informal channels to support one another in the face of shared operational challenges. Heads of HR departments and administrative apparatuses across oblasts have established regular communication through dedicated channels, which now serve as platforms for sharing documents, resolving urgent queries, and coordinating responses to evolving policy and staffing demands. This peer-to-peer exchange is described as both responsive and empowering, with oblasts providing each other with advice, examples, and even moral support during periods of extreme strain and crisis.

This inter-oblast co-operation has extended beyond information sharing to more substantive coordination. One region described how, at the height of internal displacement, their phone lines were "ringing all the time" with calls from other oblasts asking for help with accommodating evacuees or sending food or supplies – an example of administrative solidarity and capacity in action and of the resilience of the public sector in Ukraine. The establishment of a national group of chiefs of staff from regional administrations, initiated by the oblasts themselves, is another sign of institutional maturity and improvised leadership. Despite limited resources and complex working conditions, these collaborative efforts have helped maintain a sense of cohesion across the territorial administration, reinforcing the resilience of Ukraine's public service at a critical time.

Skills for evidence-based policy development and implementation

For public sector managers to be effective decision-makers, they must be well-versed in the use of evidence and the principles of policy design and implementation. In Ukraine's public service, the ability to formulate, assess, and execute policy based on empirical evidence is a necessity for good governance. Ukraine has made progress in recent years, for example with the introduction of the Government Priority Action Plan (GPAP) and improvements to the Rules of Procedure. However, strategic planning suffers from fragmentation and a lack of clarity around institutional responsibilities. These issues are compounded by skills gaps, especially in policy formulation and performance-based planning. Stakeholders interviewed noted that while various assessments and frameworks exist on paper, they are not yet fully embedded into operational practice. As a result, decision-making remains largely "experience-based" or reactive, rather than systematically evidence-based and forward-looking. A number of stakeholders also noted that strategic plans are often drafted primarily to meet external funding or donor requirements, rather than as genuine tools for government steering.

To address these challenges, Ukraine can further prioritise the development of institutional capacity for evidence-based policymaking and strategic planning. This includes not only upskilling managers to work with data and analysis, but also creating clearer mandates, procedures, and tools to help translate plans into delivery (as discussed in the dedicated chapter 2 on strategic planning in this publication). Enhancing planning capacity, especially in areas such as healthcare, infrastructure and regional development, will require both training and stronger institutional guidance. Ongoing investments in training offer a foundation for progress but must be accompanied by reforms to ensure planning systems are used as instruments for delivery.

Digital and data competencies

Digital and data competencies are essential across all levels of Ukraine's public service, but the specific skills and understanding required vary depending on position and responsibility. While not every civil servant needs to be a cybersecurity expert or programmer, a fundamental level of digital literacy is becoming increasingly urgent to ensure the efficiency, security, and responsiveness of public administration in Ukraine. The Ministry of Digital Transformation has made significant strides in this area, including the creation of a Digital Competency Framework for Civil Servants (more in the box below), and a national digital literacy test.

Still, much more can be done to ensure a higher level of digital literacy overall. Fact-finding interviews revealed significant disparities in digital proficiency across the public service workforce. In some institutions, leaders struggle with basic IT tasks, requiring assistance for routine digital processes, while in others, departments are spearheading advanced initiatives in open data, digital governance, AI, and automation. This inconsistency highlights the need for a more structured and widespread approach to digital capacity-building. To address these gaps, digital training can be prioritised and can also be tailored to the needs of different roles. For senior officials and managers, data-driven decision-making and cybersecurity awareness for examples are crucial to ensuring informed governance and security, and digital knowledge allows leaders to champion digital transformation projects. Meanwhile, mid-level civil servants may require proficiency in digital tools, information management, and secure online communication, and frontline staff must be equipped with basic digital skills to navigate government systems efficiently.

Box 5.8. Ukraine Success Story: The Digital Competency Framework for Civil Servants and the work of the Ministry of Digital Transformation

Since its establishment in 2019, Ukraine's Ministry of Digital Transformation has led a significant effort to raise digital competencies across the civil service and Ukraine as a whole. Evidence of this can be seen in growth and success across global rankings and indices. Ukraine has risen from 102nd to 5th in the UN's Online Services Index (Ministry of Digital Transformation of Ukraine, 2024[13]) and sits fifth globally for the development of digital public services as of 2024. The country ranks first in the E-Participation indicator,[16] which measures the extent to which citizens are ready to engage in government processes through online platforms.

A key milestone in this work pertaining directly to the civil service has been the development of the *Digital Competence Framework for Civil Servants* (Ministry of Digital Transformaation of Ukraine, n.d.[14]), which sets out a structure for building and assessing digital skills, based on the EU's DigComp model but tailored to the Ukrainian public sector. The framework outlines 20 core competencies across five domains, covering areas such as cybersecurity, digital content creation, and professional digital interaction. It is already being used to support professional development planning, certification, and the integration of digital requirements into civil service roles.

Since the onset of the war, the Ministry's digital agenda has taken on heightened urgency. While it was originally created to help the administration go paperless, the demand for increased digital and cyber capacities in government has grown significantly, and the Ministry has expanded its activities accordingly – including targeted training for civil servants, educators, and medical personnel. Over 113 000 public servants have already completed a digital literacy certification (Digigram for Civil Servants), supported by online resources,[17] practical tools, and collaboration with other ministries.

The work of the Ministry is being delivered by a highly capable team of digital professionals who bring technical expertise, policy acumen, and a strong sense of public purpose to their roles. The work is extremely needed and of value that likely cannot be overstated given the current context.

Interviews with regional administrations in oblasts also underscored the critical need for media and digital literacy, particularly in countering misinformation and improving public engagement. Additionally, local government representatives pointed out that while digital transformation is a national priority, there is insufficient technical support and funding to implement necessary changes at the local level. Strengthening digital competencies will require a combination of formal training, leadership buy-in, and incentives for continuous learning, ensuring that Ukraine's public service can leverage technology effectively in both daily operations and long-term policy implementation, along with for national security. As the country moves toward EU integration and post-war reconstruction, bridging these digital skill gaps will be essential for modernising public administration and creating a future-ready public service.

Box 5.9. International example: Teaching digital skills as leadership skills in Australia and New Zealand

The rapid evolution of the digital age and AI technology means that sector leaders need to keep informed and understand the changes and technology in order to be effective in their roles. Recognising this, the Australia and New Zealand School of Government (ANZSOG) launched a programme called Public Leadership in the Digital Age (PLDA), which aims to equip leaders with the essential skills and knowledge to navigate this landscape and make prepared policy decisions. The program focuses on modern digital tools, data utilisation, cybersecurity, digital identity, and the ethical use of AI.

Recognising that public sector leaders can feel overwhelmed and unprepared in the face of fast-paced technological changes the programme provides training on a mix of tools, knowledge, and mindsets required to harness digital opportunities and mitigate challenges. AI can significantly enhance government operations and service delivery but achieving this transformation and doing so ethically and with confidence requires approaching technological advances with the right knowledge to make informed decisions about its use and function.

The PLDA programme is designed to help leaders understand and leverage the opportunities and risks of the digital age. It offers a foundational literacy in digital leadership, assembling various ideas, research, and expertise to guide participants in constructing their own strategies. While it is not a comprehensive solution, the programme serves as a crucial starting point for identifying and integrating the necessary skills and capabilities for effective public leadership in the digital era. More recently, the Australian Digital Transformation Agency (DTA) and the Australian Public Service Commission (APSC) have jointly developed a Data, Digital and Cyber Workforce Plan, which provides a co-ordinated, whole-of-government approach to addressing common workforce challenges, recognising both the complexities of the external environment and the central role of digital and data capabilities in achieving government objectives.

Source: (ANZSOG, 2024[15])

Diplomacy, communication and EU-related governance skills

Skills related to international diplomacy, EU alignment, and communicating about the work of the administration externally, are essential across Ukraine's public administration, as the scope and intensity of international engagement continues to increase and change shape. These competencies are not confined to the diplomatic service alone; they are relevant across ministries, agencies, and regional authorities involved in co-operation with EU institutions, cooperative defence structures, and a growing number of bilateral and multilateral partners. Strengthening skills in areas such as alignment with EU standards, international coordination, and strategic communication will be critical to ensuring that Ukraine is well positioned to navigate complex external processes, including accession dialogues and regulatory discussions.

Languages are also vitally important. While strong language proficiency – particularly in English – is an asset for those operating in international-facing roles, stakeholders consistently noted that the overall level of confidence and capability in international communication could be further enhanced. Building the capacity of more public servants to clearly present their work and engage with international counterparts would support more effective collaboration and ensure that Ukraine is able to fully represent its reform efforts and technical achievements on the global stage. This is particularly important given the breadth and depth of international coordination now required, ranging from EU accession-related reform planning to the management of external assistance and joint programming. Several institutions reported progress in

this area, including widespread uptake of English language training supported by international partners, and the rollout of leadership courses focused on EU integration, intercultural competence, and strategic dialogue. Continued investment in these capabilities – especially beyond the capital and central institutions – is important in ensuring that Ukraine's public service can confidently and consistently engage in international governance processes.

Autonomy, problem-solving and analytical thinking

Across many of the fact-finding interviews for this report, officials emphasised the need for public servants to act with greater initiative, apply critical thinking, and adapt to evolving challenges. This was especially apparent in regional and frontline organisations, where public servants have been required to assume new responsibilities in the absence of full staffing or functional infrastructure. For example, officials in Kharkiv described having to continue operations after their main offices were destroyed by bombing, relying on remote work and improvisation to maintain continuity. Strengthening public servants' ability to think strategically, evaluate complex situations, and propose viable solutions will be essential to support effective and flexible governance and resilience in recovery and growth.

However, as several interviewees in the research of this project noted, this shift requires both a cultural change and targeted support. In many institutions, there is a strong tendency to avoid individual responsibility or defer upwards for decision-making, which can hinder problem-solving and innovative thinking. There were discussions in research interviews of a broad "lack of initiative" to be a catalyst for transformation, and reluctance to take ownership for change, particularly when there is uncertainty or institutional instability. Managerial accountability in general is a problematic skill area that Ukraine is advised to work to address. Identified in a 2018 SIGMA report, enhanced managerial accountability is urgently needed to align with EU requirements (Klaas, Marcinkowski and Lazarević, 2018[16]). Managers need to be able to innovate, delegate, be and stay informed, and have a certain degree of autonomy – with appropriate checks and balances – to make decisions.

Addressing these issues and skill/competency gaps will involve not only embedding analytical and problem-solving skills into professional development opportunities and evaluation frameworks, but also enabling a working environment that encourages independent judgement and constructive innovation. Positive examples do exist – for instance, institutions that have introduced project management training, or those where leadership encourages open discussion and brainstorming – but they remain unevenly distributed.

Box 5.10. Ukraine success story: The Ministry of Economy's adapted recruitment approach to enhance merit and source needed competencies

While conducting recruitment during the period of the suspension of the standardised procedures, Ukraine's Ministry of Economy (MoECO) has implemented a more tailored internal process to continue staffing essential roles and target the most qualified workers. While still not a full substitute for competitive selection, this approach reflects a deliberate effort to move closer to merit-based recruitment – voluntarily in the absence of mandated open competition – by identifying candidates with the appropriate competencies, motivation, and alignment with public service values. It offers a practical response to current constraints, aiming to ensure a degree of consistency and professionalism in hiring.

The process is structured around both technical criteria and behavioural indicators. Job descriptions outline formal qualifications alongside desired competencies and values, such as initiative, responsibility, and openness. A standardised interview format is used, featuring reflective questions on professional experience, achievements, leadership style, and individual motivations. This enables a more rounded view of candidates and supports the identification of people likely to perform effectively in demanding roles. As opposed to some areas of Ukraine's public service, the number of applicants to MoECO posts is often high – over 3 000 for 26 vacancies in one period – the Ministry reports that only a small share fully meets the expectations set for both technical fit and workplace ethos. Their method helps to find the most qualified staff and considers the scope of competencies required of high-performing staff.

This approach has also helped to partially mitigate challenges related to attraction, therefore going beyond traditional recruitment approaches. By offering clearer communication about roles and expectations – including what kind of work environment and values applicants can expect – the Ministry aims to appeal to candidates who are not only qualified but likely to be motivated by public service. While limitations remain, particularly in the absence of broader competitive mechanisms, the Ministry's efforts represent a constructive attempt to uphold recruitment standards under difficult conditions.

Establishing and administering processes and procedures that reinforce workforce development in the Ukrainian public service

This subject is vitally important following the two previously discussed issues, because those sections cannot be institutionalised and implemented without human resource systems in place to enforce and maintain them. Learning and development opportunities, that target the right skills, are supported and reinforced by performance management systems that incentivise learning and the use of skills on the job. A transformative workforce and development learning culture requires institutional processes that embed professional development into daily operations and decision-making. Some key factors of this, as they pertain to Ukraine, are outlined here.

Implementing a modern performance management system is vital to the modernisation and development of the public service workforce

Effective and comprehensive performance management systems are a staple of any large-scale workforce management. These systems include elements such as performance evaluations at department and individual levels, setting of objectives and targets, feedback cycles, training opportunities, ensuring promotions are based on merit and performance, and providing growth and career pathways.

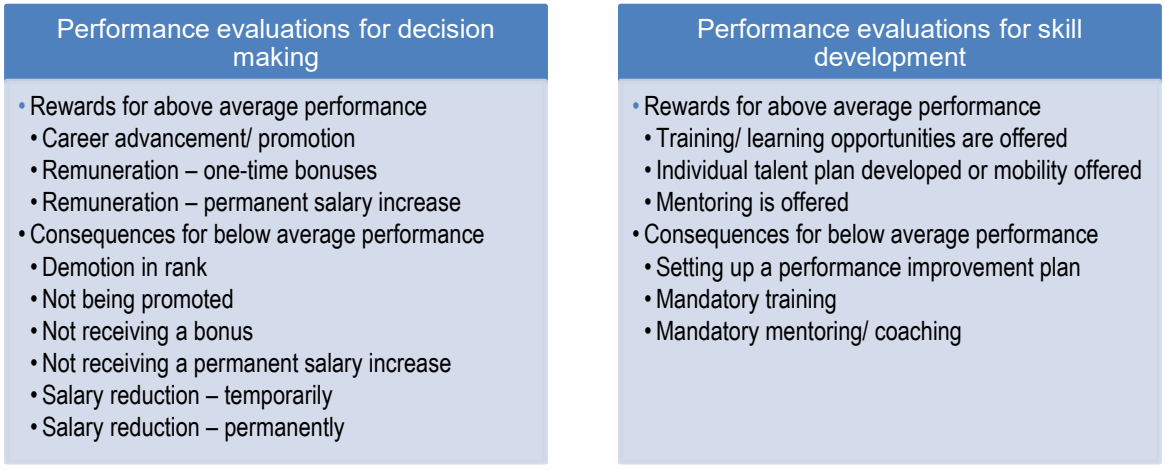
Ukraine has begun to implement workforce performance management to some degree, though efforts are somewhat slowed by the pause of merit-based decision making in hiring. More extensive strategic planning

in HR and more substantive frameworks procedures, such as competency frameworks or more widely instituted individual performance evaluations, would be useful in advancing overall workforce performance management. As substantial progress is being made in HR reforms, there is high potential in Ukraine for changes in HR policy and procedures that can be widely impactful for the overall workforce capacity and development.

Implementing and utilising substantive performance evaluation

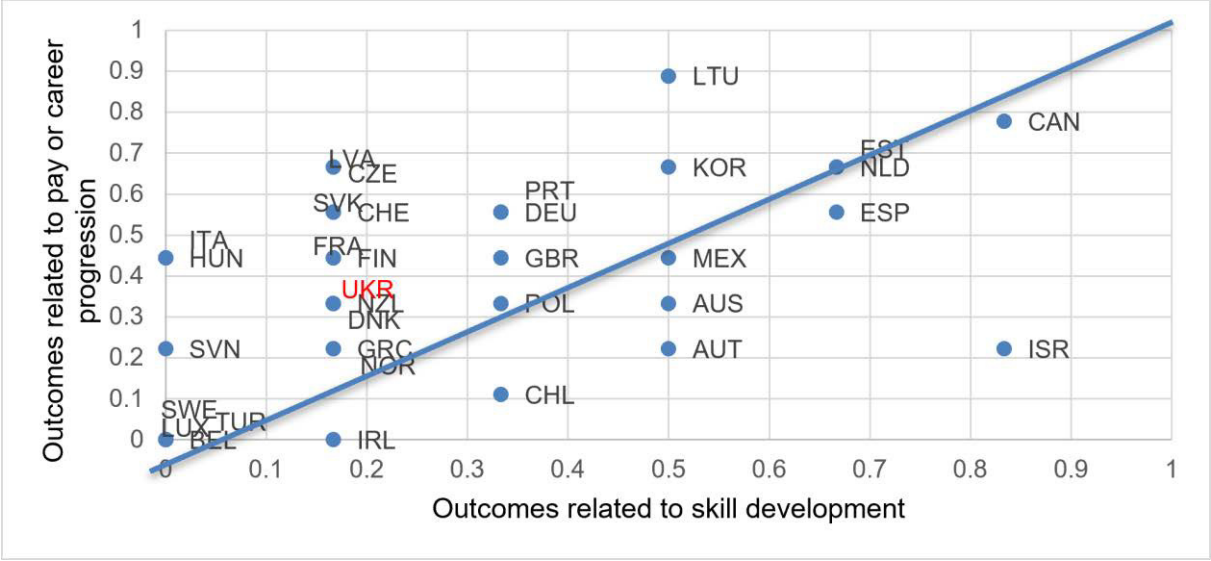
Individual performance evaluation/assessment can be a key tool in overall workforce performance management, strategy and planning. Some examples of the types of actions that can be taken for performance management based on the results of performance evaluation, are outlined below. These are divided into actions for decision-making, and actions for development.

Figure 5.10. Examples of actions that can be taken for performance management based on performance evaluation results



Recent OECD research collected data from Member countries on how they use performance evaluation results in workforce management. These questions were also extended to NAUCS in Ukraine as part of the research stage of this project. The results allow for a comparison of Ukraine's practices with OECD countries. The figure below illustrates the findings, showing that Ukraine falls lower on the matrix for using performance evaluation results in workforce management, and tends to use them more for decisions on progression or pay than on development of staff's skills. This leaves a lot of room for a greater use of these in Ukraine.

Figure 5.11. Uses of performance evaluation results, Ukraine and OECD



Source: OECD Public Governance Survey to Ukraine 2024

These decisions, of course, require that the performance evaluation itself is accurate, managed and substantive in the sense that assessments reflect actual performance and effort. Substantive individual performance evaluation is a key aspect of any workforce performance management system. Ukraine has some performance evaluations; however, these do not cover all staff and are further problematic in that the majority of staff that do receive evaluations get high ratings, and those ratings are tied to financial bonuses which have become largely expected as part of a salary package rather than considered an extra for exceptional performance. The pressure and expectation tied to the handing out of financial bonuses, especially under a system where salaries are not competitive, can create a situation in which managers and staff expect high ratings for everyone, which do not necessarily reflect true performance, and that can disincentivise the hardest workers. To begin to address this, Ukraine has recently limited the use and amount of bonuses. This is partially intended to reduce influence assessment decisions when they are tied to bonuses.

On the surface, Ukraine's public service performance evaluation system is designed to assess staff annually against the completion of specific tasks and key performance indicators, with the aim of informing decisions on bonuses, development needs, and career planning. The current model provides three official rating categories – excellent, positive, and negative – assigned based on aggregated scores ranging from 0 to 4 for each assigned task. These scores are intended to reflect timeliness, quality, initiative, ethical standards, and, notably, participation in professional development, with 0.4 ECTS credits required to be already completed (out of 1.0 for the year) to be eligible for an excellent rating.

While this structure offers a clear framework, its practical application suggests a strong skew toward top ratings: in 2024, of the 132 Category A civil servants evaluated, 92 received excellent and 40 positive ratings. Similarly, within NAUCS itself, 73 out of 91 staff received excellent ratings. Such distributions – across any country – can indicate that the system is insufficiently robust to distinguish varying levels of performances, which is essential to tie into promotion and pay decisions, and inform workforce and growth strategy. It can be noted that, while this can be the case, there is nothing concrete to indicate that these evaluations are in fact skewed within NAUCS – especially given the relatively small sample size and difficult working conditions currently ongoing. In Ukraine, the criteria for rating are formally detailed – including descriptors for each task score and aggregation rule.

The performance assessment system in Ukraine is not yet used systematically to inform broader HR planning across the public service. NAUCS, while responsible for coordinating policy, only holds evaluation data for its own staff and Category A officials; it lacks comprehensive oversight of ratings across other ministries or regions – although amendments to the LAC will mandate that this information is collected yearly over the longer term. This current situation limits the utility of evaluation results as a diagnostic tool for institutional performance or for identifying system-wide skills gaps. If there are inconsistencies in how institutions implement evaluations, such as whether ratings are linked to meaningful development or progression opportunities, this could undermine the credibility and usefulness of the system.

However, as a caveat to the above, it is very important to note that using evaluation results effectively in performance management across a workforce requires a system in which individual managers are appropriately supported and incentivised to conduct performance assessment of their staff properly. This is a precondition to their use overall, and a challenge in many countries across the OECD as well as in Ukraine. A culture of performance management must be present, well-managed and entrenched in the overall system – which itself requires reform to achieve.

Reform efforts are underway, with proposals to move away from punitive aspects (such as automatic dismissal following one negative rating – which in practice rarely or never happens – towards a system that requires a second negative evaluation[18]) toward a more developmental and motivational model (which also allows for better chances at promotion with excellent ratings). For performance evaluation to support strategic workforce development effectively, several structural issues can be addressed. These include improved standardisation in scoring practices, greater transparency in the distribution of ratings, and comprehensive data collection across all staff categories and institutions. Strengthening managerial capability to conduct evaluations and provide feedback that informs development plans and develops teams overall is essential. Linking evaluation outcomes more clearly with training, mobility, and promotion opportunities, and integrating these into a broader HR information system, could turn performance evaluation into a core aspect of the overall HR function.

Growth and promotion based on performance and merit

An area that Ukraine appears to demonstrate strength in is its ability to allow quicker growth for high performers within its public service, which distinguishes it positively among many countries. Unlike many administrations where seniority automatically dictates progression, in several Ukrainian ministries and agencies, performance is central to advancement decisions and managers report being able to promote deserving staff. For example, ministries such as the Ministry of Economy have adopted management cultures where motivated individuals can progress irrespective of tenure. This environment enables the promotion of younger or mid-career staff with the requisite skills, especially in preparation for post-war reconstruction and EU integration.

Nonetheless, significant challenges remain in ensuring fairness and meritocracy across the system. The ongoing state of martial law has suspended competitive appointments, and in its place, a considerable proportion of influential roles are being filled without open or merit-based selection processes. Stakeholders across the administration expressed concerns that political interests or expediency can sometimes override performance credentials in leadership appointments. This inconsistency undermines the credibility of reform and risks demotivating public servants who invest in professional growth. Strengthening safeguards and oversight around senior appointments, particularly through the restoration and reinforcement of competitive selection processes, is essential to consolidate Ukraine’s progress in professionalising its public service and allowing for career growth inside it.

Development, implementation and use of competency frameworks

In countries with well-developed public workforce systems, competency frameworks are often a key tool for effective human resource management. These frameworks go beyond basic eligibility criteria to define

the skills, behaviours, and attributes needed to perform successfully in specific roles and at different levels of responsibility. Importantly, they are not standalone documents, but rather they are actively used across HR processes such as recruitment, promotion, performance evaluation, skills gap analysis, training, and workforce planning. When well implemented, they help public administrations systematically identify and develop talent, close competency gaps, and align individual performance with organisational goals. They also help to signal what the administration values in its workforce and allow for more strategic workforce planning. A gap between recommended competencies and their use in HR processes limits the ability of institutions to take a strategic approach to workforce development.

In Ukraine, the existing approach does not yet constitute a substantive competency framework in this sense. What currently exists are generally position-based requirements, such as education level and years of experience, as set out in Article 20 of the Law on Civil Service and related regulations. These general and special requirements vary by job category and are intended to ensure a minimum standard for entry.

For Category A executive positions, there are some guidelines on the leadership competencies needed: leadership, communication and interaction, understanding of public policy, strategic vision, change management and innovation, integrity, adherence to ethical conduct rules, and abstract thinking. This represents a considerable start on forming a substantive framework for deeper integration into procedures. However, it is not clear to what extent these are further developed or adhered to in appointment decisions or performance reviews. Moving toward a comprehensive and applied competency framework will require sustained leadership commitment, clear institutional ownership, and capacity-building for HR units and line managers.

Developing competency frameworks can take quite a bit of longer-term effort, but once this foundation tool is created, it can have enormous effects in workforce management and development. The box below outlines one such framework developed by the OECD in Italy's Ministry of Economy and Finance.

Box 5.11. International example: Developing and using a custom managerial competency framework: an example from Italy's Ministry of Economy and Finance

In 2022-23, the OECD, Italian Ministry of Economy and Finance (MEF), and the European Commission jointly developed a new managerial competency framework or use within the Ministry. The focus of this framework is on managerial competencies for managing periods of change, specifically in the context and managers within the MEF, though its elements further support good management skills and capacities generally.

The analysis for the needs and context of the framework was multi-faceted, deploying several research sources. For example, several workshops were held in Rome with a dedicated working group from the MEF. This group was comprised of a group of senior managers, holding different roles and with various tenures and experiences in the Ministry and in the Italian public service more broadly. Four international exchanges were also held, enabling the sharing of good practices and successful experiences in developing competency frameworks and using them in HR practices.

The final competency framework has three main competency areas: competencies to do with relationships, competencies to do with actions, and competencies to do with self-awareness and orientation. There are 7 competency "clusters", containing 36 total competencies.

Source: (OECD, 2023[17])

Leveraging workforce data for strategic HR planning and decision-making can make a significant difference in long-term development

Ukraine has made notable progress in strengthening the collection and use of workforce data to inform human resource management across its public administration. In recent years, with the impetus of EU alignment, the NAUCS has taken starting steps to standardise reporting from institutions and gather workforce information through annual submissions from ministries and agencies. The Center for Adaptation of the Civil Service to the Standards of the European Union has been additionally influential in progress in this regard, as outlined in Box 5.12.

Available data now includes figures on staffing levels, vacancies, turnover, and composition, which are increasingly used to monitor public service workforce trends, issues and successes. Additionally, large-scale surveys (e.g., the needs analysis mentioned in the previous section, which sends forms to solicit information on skills gaps from ministries/managers) have been conducted to better understand staff development gaps and strategic workforce pressures. Such efforts signal an emerging recognition of the value of data-informed decision-making in shaping Ukraine's public service capacity.

The use and overall understanding of data in long-term strategic planning remains somewhat limited and can be viewed as in its starting stages in the long-term picture. Data collection is sometimes decentralised, with ministries and agencies managing their own HR information systems to varying degrees of rigour, sophistication and coherency. NAUCS is leading coordination efforts towards having an HR information system covering the whole of the civil service, and there is an increasing recognition at top levels of the need for this and a growing buy-in for these efforts.

This can be evidenced to some extent through recent development of an electronic Human Resource Management Information System (HRMIS), which is expanding across entities in the Ukraine public service. This is a key element of Ukraine's civil service modernisation and a priority within the wider public administration reform agenda and with development partners.[19] Developed by NAUCS, the system provides a centralised electronic platform for the digitalisation and management of personnel data, HR processes and payroll across government authorities. It is intended to enable remote handling of civil service entry, progression, termination, and payroll, while also supporting greater transparency and inter-agency information exchange. As of 22 August, 2025, a total of 1 069 state bodies have been connected to HRMIS, and 50 876 employee records have been entered into the system.

This uptake reflects a growing recognition of the system's functionality and efficiency, particularly as digital tools become more accepted within the public service. However, recent draft amendments for the law on the civil service fail to introduce mandatory HRMIS, which is an important weakness of the current situation given than HRMIS would not only provide centralised information in real time to decision-makers but would also make several of the HR or reporting procedures digital and automatic. Lack of mandatory integration of the Unified Portal and HRMIS is not envisaged, implying that several opportunities for streamlining processes could be missed.

Across the administration generally, inconsistencies persist in how data are gathered, reported, and interpreted. While some agencies are further ahead on data use there is limited capacity within many institutions to conduct in-depth analysis of the workforce or use data to actively inform HR policy and reform. Sometimes, even when data are collected – for example, on training participation or competency gaps – they are not always systematically analysed or translated into adjustments in strategy or resource allocation.

However, it is important to note the very substantial progress that Ukraine has made on this front in a quite short amount of time. While there is work to be done, the strides made from a baseline of a few years ago (OECD, 2018[18]) should be recognised, and required a concerted effort, skill sourcing and development, and leadership support. The continuation of this good work is essential. Building an even more coherent and strategic workforce data system will be essential to support Ukraine's reform and recovery needs. This

includes establishing a more robust and unified data infrastructure under the leadership of NAUCS, potentially in collaboration with the Ministry for the Digital Transformation, and ensuring efforts are properly resourced with highly knowledgeable people. Such a system would allow for more consistent tracking of key indicators, such as performance, skills gaps and learning effectiveness, and could enable real-time insights into workforce pressures across institutions and regions. Importantly, it would also support more effective and strategic HR planning, enabling decision makers to anticipate needs, evaluate the impact of reforms, and adjust workforce strategies as needed.

Box 5.12. Ukraine success story: Using data to drive reform: Ukraine's Center for Adaptation of the Civil Service to the European Union

Ukraine is making steady strides in strengthening its public administration in line with European standards, despite the difficult conditions posed by war and persistent resource constraints. At the centre of these efforts is the Center for Adaptation of the Civil Service to the Standards of the European Union, which plays a pivotal role in assessing and improving the capacity of government institutions involved in the country's EU integration. Over the past several years, the Center has advanced its use of data, introducing systematic approaches to gather evidence on staffing, skills, and institutional capacity needs across the public sector, focusing on state bodies pertinent to European integration.

This growing focus on evidence has enabled the Center to identify where capacity is lacking and where development efforts should be targeted, including through tools and initiatives such as the annual "Analysis of the Needs" and large-scale surveys, the Center has begun to contribute to the mapping of capacity gaps by sharing the received data with the Cabinet of Ministers. This work can inform policy changes on professional training, strategic staffing, and organisational development. While challenges remain – particularly in retaining skilled staff and ensuring adequate financial and institutional support – the Center's data-led approach is helping direct limited resources towards priority areas.

Although systemic issues resulting in staff turnover continue to affect the civil service, the Center's work is helping to bring these challenges into focus and create a foundation for more targeted and lasting capacity-building initiatives. As Ukraine moves closer to EU membership, the Center's role in promoting more structured and evidence-informed reform processes is likely to become even more significant.

5.3. Recommendations: Actionable steps for the future of Ukraine's public service

Ukraine has been making significant strides in the reform and development of its public service in recent years. This has continued to the extent possible even during Russia's invasion and the ongoing war. The resilience of Ukraine's public service workforce remains remarkably high, with a demonstrated dedication to continuing reforms and aligning workforce capability and related HR practices with EU and international standards.

To achieve this, and to develop the capacity of the public service workforce over the long term, Ukraine can take forward the below recommendations. These actionable steps follow the analysis outlined in this chapter and focus on the development of needed skills and competencies which are being called upon to support the country in both recovery and long-term sustained success and growth.

Sequenced recommendations to support workforce capacity development for the future of the public service in Ukraine

Immediate priorities under current conditions in the short term

Chapter topic area 1: Strengthen learning and development systems

- *Continue to institutionalise a coordinated and coherent L&D system*
  - Ukraine can continue working towards a mapping and strategy that encompasses and coordinates all learning, instils systems leadership to NAUCS, to make the best use of all available learning and development efforts, and to ensure there is a coherent overall system. This can still allow for the involvement and inclusion of learning run by other actors, such as ministries, regional centres and some private providers.
  - A comprehensive and frequently updated mapping of all learning offerings and their uptake is essential. The overall curriculum framework should evolve to take into account the skills need analysis discussed in the chapter and in a medium-term recommendation below, with topics and availability aligning with needs. Monitoring of learning participation and availability across workforce demographics can also ensure that barriers to development are noticed and addressed. This can help rectify factors that may be preventing the development and promotion of the most talented and motivated staff.
- *Continue expanding digital learning solutions and access*
  - Ukraine's learning efforts could benefit from expanding continuing efforts towards a dedicated and custom-tailored online learning platform that is broadly encompassing for the entire civil service and the majority of its learning needs. This can evolve and take advantage of the best of both Studyia and Diia.Education (for example, the Diia.Education "Byte Learning" format can offer microcontent and gives Ukraine the opportunity to significantly expand its digital learning catalogue).
  - More digital content can be offered, expanding the learning catalogue, and taking greater advantage of the reach and availability of learning through digital training. Ukraine can do this by bringing existing content under one umbrella to a greater extent, digitising the content of more training and topics (even those also offered in-person), increasing webinars and video content, or developing training in the form on "microcontent" such as short tutorial or video. More, and enhanced, digital content can allow for even greater reach to staff across the public service, in all geographic locations, greatly supporting overall workforce development while also requiring lower long-term resource use.

Chapter topic area 2: Identify and focus on the most-needed skills

- *Prioritise the most needed skills for the greatest impact in training*
  - Ukraine can prioritise – in quantity and quality – the learning resources that target the most needed skills for development. This can mean offering more courses to provide a greater breadth of access to more employees across the public service or increasing the depth and quality of offerings in the most important areas.
  - Notably, the priority skills for development may – and should – change over time, due to both shifting needs but also on successful development initiatives. Therefore, it is important to make the best use, eventually, of the skills analysis discussed below and adapt priority areas as warranted.

Chapter topic area 3: Establish and administer processes and procedures that reinforce workforce development

- *Create and utilise competency frameworks*
  - The use of competency frameworks – either for the overall public service or for specific roles or levels – is not yet mainstreamed in Ukraine but work can begin on this in the immediate term. This work can often be led by NAUCS, especially for competencies most applicable across the public service and levels of employees, regardless of ministry or organisational area. However, for some jobs and roles, it is warranted that specific ministries develop their own frameworks tailored to positions and growth plans. These frameworks are often especially useful at leadership and decision-making levels, and can signal and develop behaviours, attitudes and values that make managers most effective.
  - Such frameworks can then, in time, be used in other start-to-finish HR processes, such as job descriptions, recruitment, learning and development offerings, performance evaluation and promotion decisions.

Recovery priorities for the medium term

Chapter topic area 1: Strengthen learning and development systems

- *Expand the breadth of strategised learning methods to include more informal learning and mobility initiatives*
  - When establishing learning strategies and coordinated systems, Ukraine can include more forms and methods of informal learning. These types of learning can be expanded (beyond "self-education"), recognised in learning plans, and be included officially in learning strategies. Examples include designing multi-disciplinary teams, assigning temporary leadership roles for certain projects, arranging formalised chances to share and discuss "failures", and mentoring programmes.
  - Ukraine can use mobility as a learning tool to a much greater extent. This can be done across ministries and types of roles but also to and from regional levels. A mobility plan and structure can be established which clearly lays out terms, and addresses incentives and disincentives (among staff and managers), that can help or hinder the initiative. Some mobility can be more short-term in nature to address more urgent skills gaps, however a more fully developed institutionalise plan for mobility can be developed over the medium and long term to be integrated fully into learning strategies.

Chapter topic area 2: Identify and focus on the most-needed skills

- *Expand a systematic framework for skills needs analysis*
  - NAUCS can lead the establishment and implementation of a multisource and recurring skills needs analysis that provides a comprehensive view of the skills needs, both short term and long term, of the Ukrainian public service. The current Analysis of Needs can be made more comprehensive and detailed, including more sources such as staff input, more levels of management, information from training measurement and monitoring, ongoing trends in skills needs and inputs from other organisations (e.g., the EU), and any future potential skills assessments.
  - The system can be digitised, with access and interaction online, and include analytical software to manage aggregation and help in analysis of skills data and feedback.

- The information from this analysis can then be integrated into a breadth of HR processes, such as curriculum design and mapping, or performance evaluation or assessment. In turn, this integration with other systems can create feedback loops.

Chapter topic area 3: Establish and administer processes and procedures that reinforce workforce development

- *Implement and utilise more substantive performance evaluations*
  - Ukraine is recommended to develop and strengthen its use of performance evaluations across the public service workforce. Along with the return of merit-based hiring at recruitment, substantive evaluation records will support and enable the promotion and growth of the best employees and can increase motivation and performance across a workforce.
  - Performance evaluation systems and processes can be made coherent and comprehensive across the workforce, led and managed by NAUCS, with appropriate transparency and accountability measures in place.
  - This recommendation also requires that managers themselves are enabled to and accountable for carrying out fair and substantial evaluations of their own staff. Therefore, systems surrounding this must also be addressed – notably to ensure fairness and accountability in the process and ensuring that managers are properly trained with the skills needed to conduct performance conversations, record outcomes, and understand the needs and reasons behind doing so.

Reforms for the longer term

Chapter topic area 1: Strengthen learning and development systems

- *Establish learning plans and pathways for all workers in the public service*
  - Ukraine can continue to establish and reinforce detailed learning plans for all workers over a long term, to ensure that there is accountability for and data regarding ongoing skills needs, pipeline development, and HR processes.
  - Job families and established classifications can inform learning offerings and the overall training catalogue. Creating such job classifications – or adapting existing ones for the purposes of development and skills analysis – can be done in addition to their use for salaries and compensation (as is the case currently via the most recent reform). Job profiles and classifications allow for the professionalisation of public service roles and more in-depth thinking about the skills required in each, and can streamline the planning of future training.

Chapter topic area 2: Identify and focus on the most-needed skills

- *Begin longer-term work towards system-wide skills assessment*
  - Accurate skills assessments of individuals in a workforce can have a compelling impact on workforce planning and development strategies. As a longer-term goal, Ukraine can begin the work of an eventual implementation of skills assessment. In time, these assessments can be used in performance evaluations, feedback cycles, recruitment and learning design.
- *Streamline learning for foundational skills across the workforce*
  - Certain foundational skills can be set and prioritised over a longer term, subject to monitoring. These are skills that will be needed by all, or nearly all, types of public servants and are essential at entry or the early career stage. The related development paths and

curriculums for these can be streamlined, with learning offerings scaled up and standardised to some degree, to increase both reach and economies of scale over a longer term.

Chapter topic area 3: Establish and administer processes and procedures that reinforce workforce development

- *Link learning to career progression and performance evaluations*
  - Ukraine's public service workforce planning strategy can work to more strongly and formally link learning efforts and skill development to HR processes. Learning can be formally considered in hiring and promotion decisions – especially when merit-based processes for these are reinstated. Performance evaluations and objectives can also continue to take the adherence to learning plans, or learning and skill development outside of formal plans, into account through inclusion of this criteria in a specific section and with appropriate weighting.
- *Maintain stable support for a long-term L&D strategy*
  - A precondition for the success of workforce development is the long-term and stable support for its progression and implementation. Therefore, a key recommendation, on which the others rest, is for Ukraine to ensure ample and sustained support for its workforce development needs and goals. This is essential for the systems to work in conjunction and have a high impact over the long term.
  - Dedicated and stable support for development in Ukraine requires:
    - Sustained buy-in at the leadership level and a subsequent engrained belief by decision-makers in the necessity of workforce development and the substance and strategies behind associated plans.
    - Adequate human resources dedicated to workforce development, including for learning, skills analysis and HR processes. This refers not only to overall staffing and capability levels, but also to the executives who are directing, leading, supporting and overseeing these areas.
    - Sufficient financial resources to support the needed actions, strategies and infrastructure.

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Notes

[1] In accordance with the Resolutions of the Cabinet of Ministers of Ukraine as of July 30, 2025, No. 915, and August 8, 2025, No. 953, the institution of the Minister of the Cabinet of Ministers of Ukraine was abolished, and the functions of political coordination were transferred directly to the Prime Minister of Ukraine.

[2] By the end of June 2025, the number of civil servants serving in the Territorial Defense Forces of the Armed Forces of Ukraine and in voluntary formations of territorial communities (mobilised) was 4 505 persons. The number of civil servants located in the temporarily occupied territories or within areas of military (combat) operations was 5 269 persons.

[3] The full text of the PSLC Recommendation is available at https://legalinstruments.oecd.org/en/instruments/OECD-LEGAL-0445

[4] Available in Ukrainian at https://www.sigmaweb.org/publications/Principles-of-Public-Administration-2023-edition-UKR.pdf

[5] Available in Ukrainian at https://www.oecd.org/uk/publications/b0dd70ef-uk.html

[6] Ukraine's public service and human resource management were specifically and extensively assessed under the following Principles. 1: The scope of public service is adequate, clearly defined and applied in practice. 2: The policy and legal frameworks for a professional and coherent public service are established and applied in practice; the institutional set up enables consistent and effective human resource management practices across the public service. 3: The recruitment of public servants is based on merit and equal treatment in all its phases; the criteria for demotion and termination of public servants are explicit. 4: Direct or indirect political influence on senior managerial positions in the public service is prevented. 5: The remuneration system of public servants is based on job classifications; it is fair and transparent. 6: The professional development of public servants is ensured; this includes regular training, fair performance appraisal, and mobility and promotion based on objective and transparent criteria and merit. 7: Measures for promoting integrity, preventing corruption and ensuring discipline in the public service are in place.

[7] Please note, the order and numbering of these SIGMA Principles in subsequent publications is subject to change. For future referencing, please refer to the associated text.

[8] By the Law of Ukraine "On Amendments to the Law of Ukraine "On the State Budget of Ukraine for 2020"," the effect of the Law of Ukraine "On Civil Service" was suspended with regard to conducting competitive selections for civil service positions and appointing to civil service positions based on the results of such competitions. In implementation of this Law, the Government adopted the Resolution "Certain Issues of Appointment to Civil Service Positions for the Period of Quarantine Introduced to Prevent the Spread of Acute Respiratory Disease COVID-19 Caused by the Coronavirus SARS-CoV-2 in the Territory of Ukraine."

[9] Law No. 389-VIII on the Legal Regime of Martial Law of 12 May 2015, with later amendments, Article 10, paragraph 5.

[10] A strategy and an Action Plan for the Development of the System of Professional Training of Civil Servants, Heads of Local State Administrations, Their First Deputies and Deputies, Local Self-Government Officials and Local Council Members until 2027 were approved by the Coordination Council on

Professional Training of Civil Servants, Heads of Local State Administrations, Their First Deputies and Deputies, Local Self-Government Officials and Local Council Members under the NAUCS at its meeting on August 22, 2023 and December 27, 2023, respectively.

[11] According to paragraph 1, subparagraph 4 of the Procedure for Conducting a Competition for Civil Service Positions, approved by the Resolution of the Cabinet of Ministers of Ukraine as of March 25, 2016 No. 246 (as amended by the Resolution of the Cabinet of Ministers of Ukraine as of August 18, 2017 No. 648)

[12] Taking into account the requirements for the content and structure of the programmes approved by the order of the NAUCS as of November, 02 2022 No. 107-22, registered with the Ministry of Justice of Ukraine on November 18, 2022 under No. 1434/38770

[13] The Coordination Council on Professional Training of Civil Servants, Heads of Local State Administrations, Their First Deputies and Deputies, Local Self-Government Officials, and Local Council Deputies.

[14] Resolution of the Cabinet of Ministers of Ukraine No. 106 as of February 6, 2019; order of the National Agency of Ukraine on Civil Service as of December 12, 2019 No. 226-19, registered by the Ministry of Justice on December 26, 2019 under No. 1288/34259.

[15] According to Resolution No. 640 as of August 23, 2017, the assessment of task performance results is conducted between October and December. At the same time, Resolution No. 106 as of February 06, 2019, establishes the requirement to earn one ECTS credit within a calendar year, including through self-education. Therefore, starting from October, a civil servant continues implementing the individual development program until the end of December

[16] Rankings available at: https://desapublications.un.org/sites/default/files/publications/2024-09/Technical%20Appendix%20%28Web%20version%29%201292024.pdf

[17] More at: https://osvita.diia.gov.ua/en/korysni-posylannya?category=online-safety

[18] A further draft law has been introduced that modifies the regulations for dismissal to only happen after two negative ratings. This may be problematic if it can be used to further allow or reward poor performance, or disallow the use of performance evaluations to dismiss staff or incentive their development.

[19] The development and implementation of HRMIS is supported by the EU and World Bank grants: Grant No. TF0A5324 under the “Strengthening Public Resource Management” project, funded by the EU within the framework of the Public Administration and Public Finance Reform Program (EURoPAF), and Grant No. TF0B6630 under the “Public Finance Management Support Programme for Ukraine,” funded by the EU under the EU4PFM initiative.

6. Governing with Artificial Intelligence

This chapter examines Ukraine's efforts to adopt artificial intelligence (AI) in government and provides targeted policy recommendations to support its responsible and effective use for policy design, service delivery and the public sector. Applying the OECD Framework for Trustworthy AI in Government, the chapter assesses Ukraine's progress across four pillars: enablers, guardrails, engagement, and impact monitoring. It builds on Ukraine's strong digital transformation and identifies opportunities to further strengthen its AI governance. Drawing from international practices, the chapter focuses on guiding Ukraine in making effective use of AI to enhance public service design and delivery with sequenced actions for the immediate term, recovery and reconstruction, and long-term development in line with global standards.

6.1. Governing with AI

Artificial intelligence (AI) has the potential to improve public sector productivity, responsiveness, and accountability. When used in a trustworthy manner, AI can support the government in automating routine processes, tailoring services to individual needs, supporting better decision-making, detecting fraud or anomalies, and enhancing the work of public servants. As outlined in the OECD report *Governing with Artificial Intelligence: The State of Play and Way Forward in Core Government Function* (OECD, 2025[1]), AI capabilities can translate into tangible benefits for governments, including faster service delivery, cost savings, and enhanced public satisfaction. Across OECD countries and beyond, AI is increasingly being used in public services, civic participation, justice administration and other functions, particularly to improve end-to-end service delivery.

However, realising the benefits of AI in government requires addressing implementation challenges and managing potential risks. AI systems can introduce new challenges and reinforce existing ones, including issues arising from skewed data, limited transparency and explainability, and reduced human oversight due to over-reliance on automated systems. If not adequately addressed, these challenges may lead to unintended outcomes for individuals and groups, potentially weakening public trust. In addition, many AI initiatives in government remain at the pilot stage, reflecting difficulties in scaling solutions, challenges in measuring and assessing impact, gaps in data and data governance, limited investment in skills, and the absence of clear governance arrangements, including guidelines and monitoring mechanisms.

At the same time, the risks of inaction should not be overlooked. Delays in adopting AI and translating available capabilities into practice can result in avoidable financial and non-financial costs, while limiting improvements in service quality, efficiency, and productivity. They may also contribute to a widening gap between public and private sector capabilities and constrain governments' ability to effectively oversee evolving technologies. In some cases, uncertainty and risk-averse approaches may further slow adoption, even for lower-risk, high-benefit uses, limiting the extent to which governments can realise AI's potential.

To address these issues, governments must build an environment where they can use AI responsibly and ethically. Based on the *OECD Framework for Trustworthy AI in Government,* this includes developing *enablers* such as governance, digital infrastructure, quality data, and skilled talent; establishing *guardrails* through policies, oversight bodies, and transparency measures; ensuring engagement to bring a range of stakeholders into shaping the AI agenda and developing AI solutions; and anticipating and monitoring the *impact* of trustworthy use of AI systems in government (OECD, 2024[2]). While many efforts are still emerging, early lessons can guide future government actions in using AI to create more responsive and effective public services that are available to all groups in society.

Ukraine has made substantial advancements in the digital transformation of the public sector. This has demonstrated resilience and innovation in challenging circumstances due to Russia's war of aggression against Ukraine. Driven by the strategic leadership of the Ministry of Digital Transformation (MDT) and its network of Chief Digital Transformation Officers (CDTOs), the country has rapidly advanced its digital ecosystem, demonstrating that government transformation can reinforce both service continuity and national resilience. Initiatives such as the State in a Smartphone programme, *Diia*, and the government interoperability platform, *Trembita*, have significantly enhanced the accessibility and efficiency of government services, serving over 22 million users, more than half of Ukraine's population (OECD, 2024[3]; Government of Ukraine, 2025[4]). Ukraine's digital transformation journey has laid the groundwork for the effective use of AI in government to further enhance the design and delivery of public services.

This chapter applies the *OECD Framework for Trustworthy AI in Government* to Ukraine's current AI-related policies, practices, and use cases. It assesses Ukraine's progress and sets out policy recommendations sequenced across: (i) immediate priorities feasible under current wartime and institutional conditions; (ii) recovery and reconstruction priorities to pursue as capacity expands during rebuilding; and (iii) long-term development priorities to further align with OECD standards. Grounded in

relevant international best practices, the recommendations aim to support Ukraine's responsible and effective use of AI in government. The analysis reflects developments up to June 2025, which serves as the cut-off date.

6.2. Building an enabling environment for AI in government

Robust governance frameworks for AI are imperative to ensure the strategic, effective, responsible, and trustworthy use of AI in government. As governments increasingly integrate AI into their internal processes and public service design and delivery, developing clear governance structures and arrangements becomes crucial to address potential ethical, legal and operational risks. It will also support governments in ensuring alignment with relevant international regulatory standards, including, for example, the EU AI Act (Box 6.1), which lays comprehensive requirements for transparency, accountability, risk assessment and human oversight of AI systems.

Box 6.1. The EU AI Act and its implications for the public sector

The European Union (EU) AI Act is a regulation on AI that entered into force in August 2024. The regulation establishes obligations for AI based on its potential risks and level of impact. The Act identifies four **different levels of risks** that are relevant for governments' use of AI.

- **Unacceptable risk**: AI uses under this category are prohibited by the AI Act. Examples include predictive policing, 'real-time' remote biometric identification (including facial recognition) in publicly accessible spaces for law enforcement, social scoring, or assessing the risk of an individual committing criminal offences. Law enforcement and justice administration are among the functions of government most closely tied to this category, although some exceptions apply, such as use cases involving national security and those remaining subject to judicial oversight.
- **High-risk**: AI uses under this category are allowed but regulated due to their significant potential harm to health, safety, fundamental rights, environment, democracy, and the rule of law. Due to its potential impact on these aspects, most government uses of AI might fall under this category. Examples include systems used to influence the outcome of elections and voter behaviour, automated processing of personal data to assess various aspects of a person's life, assessing eligibility for benefits and services, and safety components used in the management and operation of critical infrastructure. Obligations include establishing a risk management system, conducting data governance, having in place technical documentation to demonstrate compliance, and mandatory fundamental rights impact assessments, among others.
- **Limited risk**: These systems might include systems intended to communicate with individuals, such as chatbots, as well as systems that generate content such as text and images. These types of systems have transparency obligations where developers and deployers must ensure that end-users are aware that they are interacting with AI.
- **Minimal risk:** These systems are unregulated, but a code of conduct is suggested. Examples include video games and spam filters.

Source: (OECD, 2025[1])

The OECD Framework for Trustworthy AI in Government

The OECD Framework for Trustworthy AI in Government has been developed to support governments in addressing key policy and governance challenges in their use of AI. The framework aims to provide a comprehensive approach to navigating the complexities of AI use in government, ensuring that AI is used in a strategic, trustworthy and efficient manner, and to support alignment with the OECD AI Principles (see more in Box 6.8) to which Ukraine has adhered. It was developed to address three significant policy questions, including:

- What concrete policy actions and tools can governments develop to address existing challenges for a trustworthy use of AI in government?
- Who should governments engage when developing and implementing the enablers and guardrails for the trustworthy use of AI in government?
- What impact do governments strive to achieve when using trustworthy AI?

The framework calls for strengthening enablers (Pillar 1), establishing guardrails (Pillar 2), and engagement with a broad range of stakeholders during both the design and implementation stages of AI projects (Pillar 3) (Figure 6.1).

Figure 6.1. OECD Framework for Trustworthy Use of AI in Government

The figure below shows the pillars and dimensions for the trustworthy use of AI in the public sector.

Source: (OECD, 2025[1])

These pillars serve as the basis for analysing AI readiness in Ukraine's public sector. The intent is to use the framework to provide Ukraine with concrete actions that can be taken to focus its efforts going forward, as well as the relevant international practices.

6.3. Strengthening enablers, guardrails, engagement and monitoring impact in the Ukrainian public sector

What enablers are in place for the use of AI in government?

The enablers are the foundational conditions and policy tools that should ideally be in place to create an enabling environment and unlock the full-scale adoption of AI in government. These include governance, capabilities (e.g. infrastructure, data, skills, and talent), collaborations and partnerships, including through public procurement. Together with the guardrails, these enablers also help mitigate risks and address key challenges to effective and trustworthy AI use in government. Nevertheless, not all enablers need to be in place from the outset; many can be developed iteratively as an approach to AI matures.

Progress to date

Ukraine has made significant progress in establishing the enablers for AI in the public sector, despite ongoing challenges. From a strategic standpoint, Ukraine has formulated strategic documents, namely the *Concept of Artificial Intelligence Development in Ukraine (2020)* (Government of Ukraine, 2020[5]), the *Strategy for the Digital Development of Innovations in Ukraine for the period until 2030 (2024)* (also known as Digital Innovation Development Strategy until 2030 – WINWIN) (Government of Ukraine, 2024[6]) and the *White Paper on AI Regulation (2024)* (Government of Ukraine, 2024[7]) (see more details of strategic documents in Table 6.2), which outlines both a long-term vision and short-term plans for key priority areas. Ukraine has adopted a collaborative approach in developing these documents, with contributions from various disciplines at both national and international levels. A comprehensive strategic document, the *Strategy for the Digital Development of Innovations in Ukraine for the period until 2030* (2024) aims to create new opportunities for Ukrainians in the digital innovation ecosystem. The Strategy has a specific goal on AI (see more in Table 6.2), focusing on the development of internal infrastructure for research, innovation and implementation of solutions in the field of AI. In addition, the establishment of the Ministry of Digital Transformation (MDT) has been instrumental in providing the necessary leadership to drive digital transformation in Ukraine, including the adoption of AI in government.

Furthermore, the government has initiated measures to strengthen the enablers to translate its strategic approach into tangible actions. Ukraine has made significant efforts to continue building key infrastructure that enables the delivery of government services through digital channels, as well as to share and reuse data in a secure and trustworthy manner. Initiatives such as the AI/Blockchain sandbox, for both the private and public sectors, and the WINWIN AI Centre of Excellence (see Box 6.3) have helped translate concepts into use cases in line with international norms and standards. The use of common AI tools, such as government chatbots and virtual assistants, is also gaining traction, promising economies of scale and ensuring coherent AI deployment across the public sector. Table 6.1 outlines some of Ukraine's efforts in building the enablers for the use of AI in the public sector.

Box 6.2. Digital Innovation Development Strategy until 2030 – WINWIN: Strategic Goal 16 – Developing AI Infrastructure and Innovation in Ukraine

The objective of Goal 16 is to consolidate Ukraine's standing on the global stage in the area of AI, to promote collaborative efforts in technological development, and to encourage the growth and advancement of the domestic innovation ecosystem. On this note, it aims to create an enabling environment for the implementation of AI solutions, including internal infrastructure, research and innovation.

Key projects and responsible institutions

1. AI and Governance Innovation Cluster (2025-2027)

- Responsible entities: MDT, Ministry of Education and Science (MES), Ministry of Economy (ME), Ministry of Energy (MEV), National Academy of Sciences (NASU), Higher Education Institutions
- Objective: Establish an innovation cluster connecting research institutes, universities, startups, and private companies to jointly develop governance-focused AI solutions.
- Expected outcomes: Strengthened international leadership, increased innovation capacity, and enhanced technological collaboration and exchange.

2. Ukrainian Language Resources Enrichment (2025-2027)

- Responsible entities: MES, Commissioner for Protection of the State Language
- Objective: Support projects enhancing the corpus of the Ukrainian language to promote linguistic research.
- Expected outcomes: Improved language resources, increased accessibility, and enhanced international promotion and usage of Ukrainian.

3. White Paper on AI Regulation (2025-2027) – published

- Responsible entity: Ministry of Digital Transformation (MDT)
- Expected outcomes: Clear regulatory framework, enhanced predictability, and increased transparency in AI policy and implementation.

4. High-Tech AI and Blockchain (Q2, 2025)

- Responsible entities: MDT, MES, Ministry of Health (MoH), Ministry of Defence (MoD), Ministry of Agrarian Policy and Food (MAPFU), Commissioner for Human Rights
- Objective: Establish regulatory conditions supporting the implementation and competitiveness of innovative AI and blockchain products.
- Expected outcomes: Enhanced technological innovation, increased market competitiveness, and facilitated testing and deployment of new AI-driven services.

5. AI Integration into Priority Economic Sectors (2025-2027)

- Responsible entities: MDT, Ministry of Strategic Industry (MSPU), MES, ME
- Objective: Approve and implement the State Targeted Scientific and Technical Program for integrating AI into priority sectors of Ukraine's economy.
- Expected outcomes: Enhanced AI-driven innovation across priority economic sectors, improved economic performance, and increased efficiency.

6. AI Competence Centre for Energy Security (Q4, 2025)

- Responsible entities: MEV, MDT, National Commission for Energy and Utilities, National Power Company "Ukrenergo", Higher Education Institutions
- Objective: Create a dedicated AI competence centre to enhance energy security, optimise dispatching processes, and advance "smart grid" technologies.
- Expected outcomes: Integration of advanced AI in the energy sector, increased sector efficiency and reliability, reduced energy losses, improved energy supply quality, and alignment with Ukraine's "smart grids" strategy.

Source: (Government of Ukraine, 2024[6])

Box 6.3. WINWIN AI Centre of Excellence in Ukraine

In February 2025, the Ministry of Digital Transformation launched the *WINWIN AI Centre of Excellence*, a dedicated hub for developing and integrating AI in the public sector. The initiative is part of Ukraine's Digital Innovation Development Strategy until 2030 (WINWIN), which aims to modernise public services and strengthen national competitiveness. The Centre is housed within the Ministry of Digital Transformation, ensuring close alignment with the national digital and AI strategies. It is led by the Chief AI Officer (CAIO) at the Deputy Minister level and the Chief Technology Officer (CTO).

Objectives and strategic role:

- Advancing AI adoption in public services: The Centre is designed as a catalyst to embed AI in core public sector functions, improving citizen services and internal efficiencies. A primary objective is to integrate AI into government processes and key sectors such as defence, healthcare, education and business. Through this, the government seeks to transform service delivery, personalise services and streamline administrative tasks.
- Public sector innovation and AI Governance: The Centre was developed to serve as an innovation hub for the public sector, introducing a dedicated Chief AI Officer (CAIO) role in government and a team to spearhead AI initiatives. The Centre also has a mission to unite experts, resources and innovations for AI-driven transformation of public services.
- Private sector collaboration and ecosystem building: The Centre was conceived as a bridge between the public sector and the tech industry, with a key objective to foster public-private collaboration. The Centre will work with businesses, startups and academia to co-create AI systems for public needs.

Source: (Ministry of Digital Transformation, 2025[8])

Table 6.1. What enablers are in place for the use of AI in the public sector in Ukraine?

The table below assesses the enablers that should be in place to strengthen the use of AI in government

Enablers	Findings
Strategy to guide the use of AI	• The *Strategy for the Digital Development of Innovations in Ukraine for the period until 2030 (2024)* has a specific goal on AI with six key initiatives to create an enabling environment for research, innovation and implementation of AI solutions in the selected priority areas (see more in Box 6.2). • The *White Paper on AI Regulation in Ukraine (2024)* proposes its approach to the regulatory ecosystem around AI in Ukraine. It also considers the alignment with the EU AI Act in the near future. • The *Concept of Artificial Intelligence Development in Ukraine (2020)* determines priority areas and main tasks for the development of AI. At the time of drafting this report, an Action Plan for the implementation of the Concept has been in the process of formal approval. The proposed Action Plan specifies a timeframe for the development of a draft law on AI.
Clear roles and responsibilities	• The Ministry of Digital Transformation (MDT) serves as the central authority for AI governance, responsible for developing and implementing national AI policies and strategies. It also coordinates AI pilot projects across the public sector and engages with private technology partners. • The *Expert Committee on the Development of AI in Ukraine*, also referred to as the multi-stakeholder AI Committee, operates as an advisory body to the MDT. Established in 2019, the Committee brings together experts from government, academia, the private sector, startups, and civil society. It supports AI policymaking by conducting consultations, incorporating expert perspectives, and fostering effective public-private partnerships. The Committee is organised around four thematic workstreams: public administration, education, security and defence, and regulation. • The *Parliamentary Committee on Digital Transformation of the Verkhovna Rada of Ukraine* plays a key legislative role, as AI-related initiatives fall under its jurisdiction. • The Cabinet of Ministers ensures strategic oversight and inter-ministerial coordination in the implementation of AI strategies and legislative frameworks, while the Ministry of Education and Science contributes by promoting AI research and developing talent.
Coordination of AI initiatives	• Within the MDT, a dedicated Chief AI Officer (CAIO) position (head of the WINWIN AI Centre of Excellence) has been introduced to lead the implementation of Ukraine's AI agenda. AI coordination is shared across key directorates within the Ministry, including the Directorate on Digital Economy and the Directorate on EU and Euro-Atlantic Integration, which are tasked with aligning national AI legislation and standards with European Union requirements. • Ukraine has established the WINWIN AI Centre of Excellence (Box 6.3) to serve as a central hub bringing experts and resources from various sectors, including the private sector and academia, to advance AI initiatives across the public sector (EU4Digital, 2025[9]) The Centre also plans to gather proposals from public officials for improving processes or services supported by AI solutions. • The country has established a Chief Digital Transformation Officer (CDTO) in every public sector institution. The CDTOs are responsible for driving digital transformation at the institutional level in line with the national priorities and strategic directions.
Testing and experimenting	• The government launched the Sandbox to support the adoption of AI and blockchain technologies in a safe and controlled environment from the design stage in June 2025. The Sandbox is supporting the government in shaping the AI law based on evidence coming from testing and experimentation. • The *WINWIN AI Centre of Excellence* functions as an incubator for pilot AI systems, enabling analysis, development and experimentation of AI-driven tools (EU4Digital, 2025[9])
Access to sufficient and quality data	• Data governance: The AI strategic documents emphasise the importance of data quality and interoperability. Many public sector institutions have digitised their records and share data through *Trembita*, the *System of Electronic Interaction of State Electronic Information Resources*. Key registers (e.g., population, business, property) are integrated with the *Diia* platform. Additionally, there have been initiatives to create large-scale databases for specific objectives, such as the demining AI platform project. Nevertheless, challenges remain in achieving greater interoperability, enhancing data quality (e.g. ensuring consistent standards across different levels of government), and improving data skills and resources. • Open government data: Ukraine has been one of Europe's leaders in opening government data through data.gov.ua. With the law on access to public information, a resolution of the Cabinet of Ministers enabled hundreds of datasets to be made publicly available.
Common use of AI tools in use across public sector	• Ukraine is starting to deploy AI tools that can be commonly used by public sector institutions. A good example is an AI virtual assistant of the Diia portal. As Diia serves as the single service delivery channel for over 100 public services, the AI assistant in Diia is effectively providing support for the entire public sector service delivery. In addition, a chatbot, *Natalka*, has supported public organisations integrating with Diia. Several AI tools are under development to provide common service to the public sector institutions. These include an AI tool for analysing regulations and an HR AI assistant to support HR units across the public sector (see more in Box 6.17).

Enablers	Findings
Coordinated investment on AI	• Ukraine is working on a more structured and coordinated approach to investment on AI. Currently, financing of AI initiatives has been a mix of government budget, international aid and private sector contributions.
Digital infrastructure	• Ukraine's digital infrastructure has proven robust and adaptive. The internet connectivity and cloud infrastructure have been maintained at high levels to allow cloud-based services and widespread use of digital government services. The country has collaborated with the international community to build resilient infrastructure to strengthen available platforms and tools like *Diia* and *Trembita.*
Building organisational trust	• Ukraine adheres to the OECD Recommendation on AI, thereby committing to the five OECD values-based principles and five recommendations to policymakers. • At the international level, Ukraine signed the Council of Europe's *Framework Convention on Artificial Intelligence* in May 2025, which reinforced the country's commitment to trustworthy use of AI (see more in section What guardrails are in place for the use of AI in government? And Annex 6.A). • The *White Paper on AI Regulation* emphasises the importance of ethical AI. Ethical considerations are integrated into Ukraine's AI roadmap (see Box 6.10), aligning with international practices to enhance accountability and transparency in AI development and deployment. The White Paper presents the Council of Europe's *HUDERIA* methodology for assessing the human rights impacts of an AI tool, evaluating potential harms and addressing ethical concerns, including data privacy and skewed decision-making processes. • The government has developed various guidelines for different sectors, including for public servants to use AI responsibly with a strong emphasis on risk mitigation when using AI tools (National Agency of Ukraine on Civil Service, 2025[10]) (see more in section What guardrails are in place for the use of AI in government?).
Skills and talent	• A relevant focus has been on raising AI literacy and skills within the public service. In 2024, the National Agency of Ukraine on Civil Service (NAUCS) launched short-term training programmes on AI for public officials (National Agency of Ukraine on Civil Service, 2024[11]). • The *Chief Digital Transformation Officer (CDTO) Campus* is an educational initiative aimed at cultivating leaders to drive digital transformation across various levels of government. It provides programmes to support digital leadership development and institutional capacity building on digital and innovation. It offers a dedicated programme on implementing AI in the government (Government of Ukraine, 2023[12]). • The Ministry of Digital Transformation launched Ukraine's digital literacy initiative, *Diia.Digital Education*, which includes specific content for public servants. The public-facing education series provides courses relevant for public officials on improving general AI literacy as users (Ministry of Digital Transformation, 2025[13])

Where to focus next

Despite promising progress, to leverage the full potential of AI and scale-up the ongoing efforts, Ukraine can do more to institutionalise AI governance arrangements, enhance its data and digital infrastructure, and strengthen monitoring of trustworthy AI use in the public sector.

A critical challenge for the future is to formalise Ukraine's governance arrangements around AI across government. Building on the strong leadership of the MDT and the recently created role of the Chief AI Officer (CAIO), there is a growing need from the public sector institutions and partners for a permanent coordination mechanism at the centre dedicated to AI to implement and oversee the national AI agenda. The establishment of such a mechanism would ensure policy coherence, define central standards and guidelines, monitor risks and drive further coordination across sectors and levels of government (see Box 6.4 for an international example). Refining and strengthening the roles and responsibilities of the CDTOs would also help institutionalise accountability and implementation capacity within the public sector.

Box 6.4. International case: Korea's National AI Committee

In September 2024, Korea established the National Artificial Intelligence Committee, a high-level advisory body designed to steer the country's AI strategy. The Committee is co-chaired by the President and a prominent private sector leader, embodying a collaborative approach between government and industry. The Committee is comprised of seven ministers from ministries, including the Interior and Safety, Science and ICT, Economy and Finance, Trade, Industry and Energy, Education, and Foreign Affairs, as well as five deputy-minister-level government officials. In addition, the industry and academia are represented by 29 experts. The Committee also has subcommittees focusing on specific AI domains such as ethics and safety, talent development and legal and institutional challenges.

The Committee is supported by the Secretariat, composed of four teams – Policy and System, Safety and Trust, Industrial Technology, and Talent Infrastructure.

The Committee's primary responsibilities include:

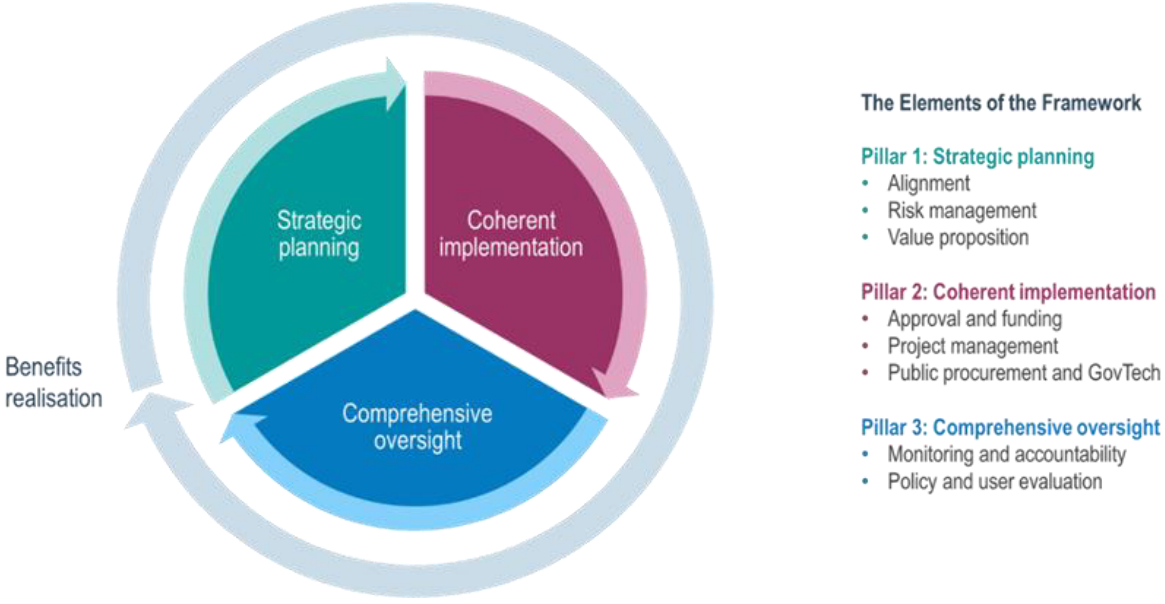
- Reviewing and coordinating national AI policies to ensure alignment across various governmental and private sector initiatives.
- Developing strategies for research, development, and investment to identify priorities and allocate resources effectively.
- Expanding AI infrastructure to facilitate the growth of data centres and computing resources.
- Identifying and improving regulations to address legal and ethical considerations related to AI deployment.
- Disseminating AI ethics principles to promote responsible AI practices across sectors.
- Responding to sectoral changes, including adapting to AI-driven transformations in education, labour, and the economy.

Source: (Korean Government, 2024[14])

Institutional development needs to be supported by sustained investment. Ukraine has demonstrated agility in mobilising international support and forging public-private partnerships. However, the long-term success after the war requires a stronger strategic approach to digital government investments, including AI initiatives in the public sector. This would enable Ukraine to manage digital government investments across the full lifecycle, from planning to evaluation, in a coordinated way, aligning them with the national strategies and long-term priorities. Ukraine would also be able to target funding for essential, shared services and systems across the public sector (see more in Figure 6.2 and Box 6.5) (OECD, 2025[15]).

Figure 6.2. OECD Digital Government Investment Framework

The figure below shows the pillars and dimensions of the framework.



Source: (OECD, 2025[15])

Box 6.5. International case: Australia's strategic oversight of digital investments

Australia has adopted a comprehensive, whole-of-government approach to coordinating digital and ICT investments, anchored in the mandate of the Digital Transformation Agency (DTA). The DTA operates as the central authority for guiding digital transformation across the federal public sector. Established to provide leadership on government service delivery, the agency is legislatively empowered to lead policy, provide strategic oversight, and ensure value-for-money outcomes in the planning, procurement, and implementation of digital initiatives. This integrated mandate reflects Australia's recognition that managing digital transformation, including the use of AI, requires not only technical capacity but also strategic governance throughout the full investment lifecycle.

Responsibilities of the DTA

The DTA's core responsibilities include developing and monitoring national digital strategies, setting ICT standards and policies, and overseeing digital and ICT investments across government. The DTA also advises the responsible Minister on digital investment proposals and ensures alignment with broader public sector reform goals. In addition, the agency manages a centralised procurement function, simplifying purchasing for government agencies while promoting the reuse of digital platforms and services.

Implementation through the Digital and ICT Investment Oversight Framework (IOF)

To operationalise its oversight function, the DTA introduced the Digital and ICT Investment Oversight Framework (IOF), a structured, end-to-end model for managing public sector digital and ICT investments across their lifecycle. The IOF is built around six interdependent stages that mirror the annual budget process:

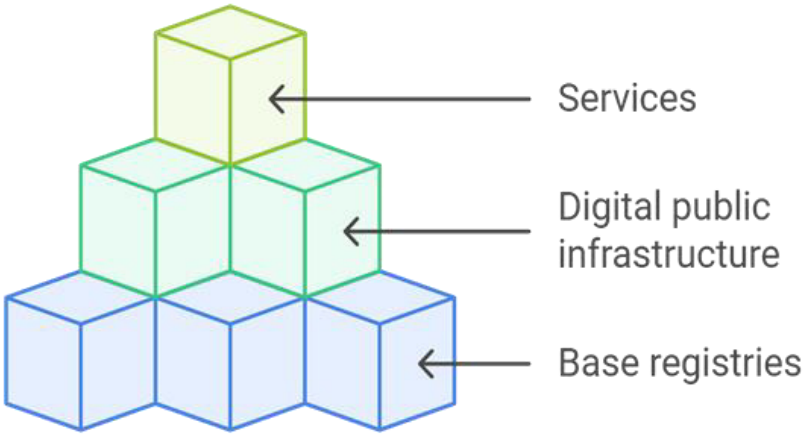
- **Strategic Planning (Pre-Budget):** Engages agencies in long-term investment planning to identify gaps, avoid duplication, and align proposals with whole-of-government digital goals.
- **Prioritisation (Pre-Budget):** Assesses and ranks investment proposals based on six criteria, including alignment with government strategy, risk profile, and expected public value.
- **Contestability (Budget Phase):** Provides a mechanism for reviewing and refining proposals through inter-agency consultation, ensuring adherence to policy, design standards, and technical feasibility.
- **Assurance (Implementation Phase):** Implements oversight and risk management measures during delivery, tailored to the size and criticality of each investment.
- **Sourcing (Implementation Phase):** Applies dynamic purchasing and procurement frameworks to ensure value-for-money and reuse of proven tools and services across the public sector.
- **Operations / Real-World Use (Ongoing):** Focuses on data collection, performance tracking, and continuous monitoring of investment outcomes to inform future decisions.

Source: (OECD, 2025[15]; Australian Goverment, 2021[16]; Digital Transformation Agency of Australia, 2025[17]).

In addition to considerations of governance and investments, data quality and digital infrastructure will be pivotal to scaling up the AI use in the public sector. Ukraine should build on its existing data exchange frameworks, such as *Trembita*, by improving data standards, interoperability and ensuring real-time access across registries and systems. Concurrently, increasing use of AI-driven services will require robust digital infrastructure. Ukraine should consider continued investment in a set of shared, secure and interoperable digital systems, designed to support broad access to public and private services, also known as digital public infrastructure (DPI) (see more in Figure 6.3 and Box 6.6). This would not only generate efficiency gains, but also promote resilience, security and scalability for the public sector to provide better and responsive services (OECD, 2024[18]). In addition, investing in DPI would contribute to building national capabilities to produce AI using its own data, infrastructure and workforce (OECD, 2025[1]).

Figure 6.3. Digital public infrastructure as a service enabler

The figure below shows the connection between base registries, digital public infrastructure, and services.



Source: (OECD, 2024[18])

Box 6.6. International cases: Digital Public Infrastructure (DPI) for AI

Korea's shared data centres and government cloud

Korea's National Information Resources Service (NIRS) has been working with the Ministry of the Interior and Safety to upgrade key hardware, networks, and management tools to help modernise Korea's technology and enable a migration to the cloud. A critical part of this has been the construction of new government data centres, which ensure compliance with government requirements, cost-efficiencies with a reduced technology footprint, and job creation and local investment in target areas. These data centres have also been made available to the Government's main partners in the private sector, which helps to ensure that companies holding or handling sensitive data are doing so in an environment that meets the government's requirements for security, back-up, and redundancy, among others. With measures around environmental considerations and renewable energy, the data centres help reduce the environmental impact of Korea's digital government, particularly as it prepares to make greater use of AI solutions.

AI foundation models

Foundation models are advanced generative AI systems trained on extensive datasets, typically through self-supervision at scale, enabling their application across a broad set of tasks. Governments may either develop dedicated foundation models or customise the use of existing proprietary or open source models to fit national or public-sector contexts. Such customisation is achieved by fine-tuning the model, including additional training using targeted datasets, to improve its effectiveness in performing specific tasks or addressing particular issues.

Increasingly, governments are interested in developing national or regional foundation models as a means to strengthen technological sovereignty and accurately represent linguistic and cultural nuances. The most notable examples include:

- *Latam-GPT*, developed collaboratively by over 30 institutions in Latin America to create an AI model trained specifically on regional data
- *OpenEuroLLM*, an EU-funded project building open-source models to encompass all official European languages
- Italy's *Minerva* project, the first large language model fully developed and trained specifically for the Italian language built entirely from scratch.

Source: (OECD, 2025[1]; Du, 2023[19]; Mac Aonghusa and Michie, 2020[20]; Ludwig, 2022[21]).

Finally, it is crucial that the trustworthy use of AI remains a key guiding goal in all AI development and deployment to maintain public trust. As outlined in the White Paper on AI Regulation, ethical guardrails need to be operationalised through practical implementations (Government of Ukraine, 2024[7]). Each public sector AI initiative should be accompanied by an ex-ante impact assessment to identify potential risk and mitigation strategies from the outset, as well as a risk-based approach for managing potential risks that may arise. Ukraine could consider implementing initiatives promoting algorithmic transparency, especially for high-risk AI systems. Engaging civil society, academia, and service users in these processes would further reinforce legitimacy and help ensure that AI-driven services reflect the broad set of needs and rights of the population. These instruments are discussed in the following section on guardrails, including international examples.

What guardrails are in place for the use of AI in government?

Guardrails are policy tools that help governments set boundaries for the responsible, trustworthy, and human-centred use of AI in government and in particular to improve public service delivery (OECD, 2024[2]). These can include soft laws and guidance as standards, policies, laws and regulations, enforcement mechanisms, monitoring bodies (within the executive), oversight bodies (beyond the executive), or collective agreements with the public sector workforce (OECD, 2025[1]). Together with the enablers, these help to overcome some of the key risks and challenges, such as lack of accountability and oversight, insufficient transparency and explainability, risks arising from skewed data, and weak cybersecurity robustness, among others (OECD, 2025[1]). This analysis explores key guardrails for AI in government, outlining Ukraine's current progress and identifying remaining gaps.

Progress to date

Ukraine has made significant progress in laying the groundwork for the trustworthy use of AI in government and, more specifically, in public service delivery. However, many initiatives remain at a preliminary stage. As shown in Table 6.2, the adoption of the *Strategy for the Digital Development of Innovations in Ukraine for the period until 2030 (2024)* (see more in section What enablers are in place for the use of AI in government?) and the launch of the *AI Regulation Roadmap (2023) and White Paper (2024)* (see more in Box 6.7) reflect a commitment to aligning with international standards, such as the EU AI Act (see more in Box 6.1). The strategy and roadmap have aimed to promote the adoption of AI in government by introducing measures, including a phased approach with voluntary tools, sectoral guidelines, and institutional capacity-building. These measures are gradually paving the way for more binding instruments, such as dedicated AI legislation and the establishment of a regulatory authority (Government of Ukraine, 2024[22]; OECD, 2025[23]). Ukraine has also introduced soft laws to guide AI development, including the *AI Regulation White Paper* (see more in Box 6.10), voluntary codes of conduct, and guidelines for public servants and other sectors (Government of Ukraine, 2023[24]; OECD, 2025[23]).

At the same time, the Government of Ukraine is preparing a draft Law on AI, which is expected to be in alignment with the EU AI Act (OECD, 2025[23]). Ongoing work on supporting institutional frameworks includes an upcoming National AI Development Strategy 2030, and a National Digital Agenda, which aim to position the country among the global leaders in the use of AI across society and public administration (OECD, 2025[23]) (see more in Table 6.2). These efforts are expected to prioritise ethical considerations, transparency, and human rights, as reflected by Ukraine's adherence to the *OECD Recommendation on Artificial Intelligence* [OECD/LEGAL/0449], its signing of the *Council of Europe's Framework Convention on Artificial Intelligence* (Council of Europe, 2024[25]), and other international commitments promoting the responsible and ethical use of AI (see more in Annex 6.A).

The country is building its regulatory and institutional capacity to support a future unified digital regulatory authority dedicated to overseeing AI development and ensuring compliance with forthcoming binding AI legislation. This aims to align the use of AI in government and society with the EU AI Act. Table 6.2 also presents that Ukraine is progressively developing AI technical guidelines, modernising its data protection law to align with the General Data Protection Regulation (GDPR), and launching initiatives such as the *Responsible AI Centre* to inform stakeholders about incoming legislation (Government of Ukraine, 2024[22]), and Glossary of Terms on AI (Government of Ukraine, 2024[26]). New methodologies, such as *HUDERIA* (see Table 6.2), are supporting risk assessment, transparency, and efforts to mitigate skewed outcomes (Government of Ukraine, 2024[7]). Additionally, cybersecurity institutions are incorporating AI into training programmes, and innovation procurement practices are beginning to evolve, though AI-specific clauses on ethics, transparency, or risk management are not yet included in public tenders (Government of Ukraine, 2024[7]). While formal regulatory mechanisms, such as audits, compliance inspections, and centralised oversight, are still evolving, Ukraine's phased approach, prioritising soft regulation, is

supporting its transition toward the development of a more robust AI governance and further alignment with the EU AI Act (OECD, 2025[23]; European Union, 2024[27]).

Table 6.2. What guardrails are in place for the use of AI across the government?

The table below assesses the guardrails that can be in place to strengthen the use of AI in government

Guardrails	Findings
Monitoring and oversight of AI policy initiatives and systems	• Ukraine's AI strategic documents include procedural monitoring practices. The *Concept for the Development of Artificial Intelligence in Ukraine (2020)* (Government of Ukraine, 2020[5]), and the *Strategy for the Digital Development of Innovations in Ukraine for the period until 2030 (2024)* (Government of Ukraine, 2024[6]) contain provisions relevant to the oversight of AI in government. In particular, the Strategy outlines procedural monitoring mechanisms, mandating the MDT to submit annual progress reports to the Cabinet of Ministers and requiring ministries to report on the implementation status. While this establishes a foundation for institutional accountability, it does not yet define specific oversight and accountability bodies and mechanisms for AI systems, underscoring the need to operationalise oversight frameworks across the public sector. • Ukraine has not established a dedicated centralised body or registry to monitor AI solutions, but coordination roles are in place. The *White Paper on Artificial Intelligence Regulation in Ukraine (2024)* explicitly calls for the eventual creation of a dedicated unified digital regulatory authority that will oversee AI development and ensure compliance with forthcoming national legislation, in alignment with the EU AI Act (Government of Ukraine, 2024[7]). However, due to limited institutional capacity and resources, this body has not yet been established (Government of Ukraine, 2024[7]). Instead, Ukraine is pursuing a phased approach focused on capacity building and voluntary tools to prepare both the public sector and businesses for mandatory AI regulation in the medium term (Government of Ukraine, 2024[7]). • Centralised oversight is currently limited to the policymaking and coordinating role of the MDT and its expert committee rather than an enforcement authority (IFES, 2024[28]). The multi-stakeholder *Expert Committee on the Development of Artificial Intelligence* works across multiple domains, including a dedicated workstream on AI in public administration, which guides and monitors AI projects in government to some extent, such as AI adoption in the *Diia* e-government platform, and conducting mapping exercises of AI developments in the public sector (see more about coordination roles in What enablers are in place for the use of AI in government?) (OECD, 2025[23]; IFES, 2024[28]).
AI policies	• Ukraine has progressively advanced its national AI policy framework to support the responsible, trustworthy, and human-centred use of AI in government. The country's AI policy development began in December 2020 with the adoption of the *Concept for the Development of Artificial Intelligence in Ukraine*, which established guiding principles and strategic objectives for positioning AI as a national technology priority. This was followed by the approval of an *Action Plan for the Implementation of the Concept* (2021–2024), which laid the operational foundations for advancing AI including in public administration. • Ukraine has developed a growing institutional framework for the use of AI in government. In 2023, the Ministry of Digital Transformation of Ukraine (MDT), with its Expert Committee, developed an *AI Regulation Roadmap (2023)* (Government of Ukraine, 2023[24]) as a strategic guide for transitioning from principle-based frameworks to legally binding regulation. The roadmap emphasised the need to align national efforts with the EU AI Act, uphold high standards of human rights protection, and foster innovation as part of Ukraine's European integration efforts (Government of Ukraine, 2023[24]). It proposed a phased regulatory model, starting with soft law tools and institutional capacity-building, leading to the eventual adoption of binding rules (Government of Ukraine, 2023[24]) (see more in Box 6.7). • In April 2024, the government approved *the Concept of the State-Targeted Scientific and Technical Programme for the Use of AI Technologies in Priority Economic Sectors until 2026* (Government of Ukraine, 2024[29]), further extending AI as a driver for sectoral transformation. By the end of 2024, Ukraine had also adopted *the Strategy for the Digital Development of Innovations until 2030* (Government of Ukraine, 2024[6]), along with its Operational Plan (2025–2027), which explicitly mandates the development of an AI regulation White Paper, the launch of a sandbox programme, and a phased transition to EU standards (Government of Ukraine, 2024[6]). In parallel, the *Ukrainian Global Innovation Strategy* (2024), also known as the *WINWIN Strategy*, have focused on creating specialised innovation platforms in priority sectors, removing regulatory barriers that slow experimentation, and building direct connections between government, business, and developers (Government of Ukraine, 2025[30]). • Building on this, the MDT released *the White Paper on AI Regulation in Ukraine* in 2024, which introduced the two-stage regulatory approach (Government of Ukraine, 2024[7]). The first stage, spanning approximately two to three years, focuses on voluntary and preparatory mechanisms, such as a sandbox for AI and Blockchain products, impact assessment methodologies, and sectoral recommendations. These tools aim to support the public sector and businesses in aligning with future requirements and allow the government to build oversight capabilities. The second stage envisions the adoption of a comprehensive AI law aligned with the EU AI Act and the creation of a national regulatory authority to enforce compliance (Government of Ukraine, 2024[7]) (see more in Box 6.10). • As of 2025, no specific AI law has been passed yet; however, groundwork is underway to consolidate a coherent legislative and institutional framework. Ukraine is currently developing a Draft Law on AI, along with a National AI Strategy 2030 and a National Digital Agenda to align more closely with the EU AI Act, and implement the second stage of the White Paper. These efforts also aim to strengthen its position as a global leader in AI, with the ambition of ranking among the top countries

Guardrails	Findings
	in AI developments across society and public administration (OECD, 2025[23]). The 2025-2026 Action Plan for the *Strategy for the Digital Development of Innovations until 2030* includes the submission of this draft law on AI regulation (Government of Ukraine, 2024[29]). Although legislation has not yet been enacted, Ukraine's evolving regulatory framework demonstrates a deliberate and structured path toward the responsible use of trustworthy AI in the public sector, in alignment with the EU AI Act and OECD AI Principles (see more in Box 6.8). The government is also updating related laws, for instance, by drafting a new personal data protection law aligned with the European GDPR and Data Act, which would support AI governance, including service delivery (IFES, 2024[28]; OECD, 2025[23]).
Guidelines on the design, development, and management of AI systems	• Ukraine has several guidelines for managing the use of AI in the public sector and beyond. The country has begun issuing non-binding regulations, such as soft laws and guidelines, to steer the responsible design and management of AI systems as a precursor to formal regulation (IFES, 2024[28]). In early 2025, Ukraine published a practical guide for Ukrainian public servants on the ethical, safe, and effective use of AI in government operations. It is part of Ukraine's roadmap for AI regulation and aligns with international standards such as the EU Artificial Intelligence Act and the *Council of Europe's Framework Convention on AI*. The guide promotes responsible AI use by emphasising, for example, legality, transparency, data protection, and human oversight. It encourages the use of AI to optimise workflows, automate routine tasks, and improve public service delivery, while minimising risks such as data leaks, skewed algorithmic outputs, and misinformation. Ukraine has also developed guidelines for the use of AI in higher educational institutions, schools, the intellectual property field, media, and the advertising sector. Guidelines for developers, lawyers, courts and some others are currently being developed (Government of Ukraine, 2024[22]).
Technical AI standards	• There are no official technical standards specifying how to retrain AI models, prevent model drift, or ensure technical robustness over time. This lack of standards means there are no uniform criteria for model performance, accuracy, or lifecycle management across service delivery AI projects (OECD, 2025[1]). Interviews with stakeholders in the country have noted insufficient standardisation of requirements for AI technologies as a key issue (Government of Ukraine, 2024[29]; OECD, 2025[23]) Similarly, there is a lack of process for pre-deployment compliance checks or ongoing controls (Government of Ukraine, 2024[29]). To address this, the MDT is conducting an AI mapping exercise to emphasise alignment of technical standards with global norms, especially the Council of Europe's *Framework Convention on AI* (Council of Europe, 2024[25]; OECD, 2025[23]).
Trustworthy and ethical AI considerations	• Ukraine's AI governance approach places particular emphasis on AI ethics and human rights, combining international alignment with national initiatives. As detailed in Annex 6.A, the country has progressively moved from voluntary commitments to signing binding international instruments such as the Council of Europe's Framework Convention on AI (Council of Europe, 2024[25]). This evolution reflects Ukraine's broader effort to align with the EU's AI Act, expected to be adopted by 2027, which sets out risk-based, human-centric AI regulation (European Union, 2024[27]; OECD, 2025[23]). • At the local level, the country has been working on several initiatives. Nationally, Ukraine's *Strategy for the Digital Development of Innovations until 2030* (Government of Ukraine, 2024[6]) *and its AI Regulation Roadmap and Whitepaper* (Government of Ukraine, 2024[7]) echo the ethical principles of the *EU's Ethics Guidelines for Trustworthy AI* (Europe Union, 2019[31]) and the *OECD Recommendation of the Council on Artificial Intelligence* (OECD, 2024[32]). Ukraine is also adopting a phased, bottom-up regulatory approach: beginning with non-binding guidance, sectoral initiatives, and voluntary AI commitments, such as the MDT and Ombudsman Office's Guidelines on *Human Rights in the Era of Artificial Intelligence: Challenges and Legal Regulation* (EU4Digital, 2024[33]), before transitioning toward national legislation harmonised with the EU AI Act.
Risk assessment of AI solutions	• Ukraine has yet to implement mandatory risk assessments, but methodologies are being introduced to measure the impact of AI on human rights, democracy, and the rule of law. Ukraine does not require a formal risk assessment for public agencies, such as algorithmic reviews, before deploying public sector AI systems; however, awareness of this need is growing. Ukraine is preparing to implement risk-based governance as part of aligning with the EU AI Act (IFES, 2024[28]) As such, Ukraine is a participant in the Council of Europe's *HUDERIA* initiative (Government of Ukraine, 2024[22]), a non-binding methodology that supports the adoption of *the Framework Convention on Artificial Intelligence and Human Rights, Democracy, and Rule of Law* (2024), which Ukraine signed in May 2025 (Council of Europe, 2024[25]) • Ukraine's soft law instruments encourage risk assessment as part of the AI development process. The AI guidelines for civil servants include risk assessment as one of the main principles for public organisations (Government of Ukraine, 2025[34]). The guidelines encourage conducting assessments from both a legal and technical standpoint at all stages of the AI system's lifecycle, and include a practical risk assessment algorithm for selecting AI systems, reinforcing the importance of this process in everyday public sector decisions (Government of Ukraine, 2025[34]). More generally, the White Paper on AI regulation proposes developing a methodology for assessing AI's impact on human rights, which would function as an AI risk assessment framework at the national level (Government of Ukraine, 2024[7]). This is especially relevant for high-stakes AI systems, such as those involving fundamental rights or social services (Government of Ukraine, 2024[7]).
Cybersecurity assessment of AI solutions	• General cybersecurity practices exist, but there is no AI-specific security assessment. Ukraine lacks a dedicated AI cybersecurity standard, or audit process separate from general IT security requirements (OECD, 2025[23]). AI solutions deployed in the public sector must comply with overall government cybersecurity policies and undergo security testing as any other IT system (OECD, 2025[23]). This means that AI applications handling sensitive data may lack specific assessments of data encryption and network security standards or may not be evaluated for vulnerabilities. AI-specific cybersecurity concerns, such as cyberattacks on algorithms or model robustness (e.g., TRASSIR system), are only beginning to be addressed (Digital Security Lab Ukraine, 2024[35]). To build expertise, Ukraine's cybersecurity institutions are launching training courses on using AI in cybersecurity (e.g. detecting threats) (Government of Ukraine, 2025[36]). The AI Guidelines for public servants include a section that promotes cyber hygiene alongside legal, ethical, and procedural

Guardrails	Findings
	safeguards to minimise institutional and national security risks, such as those arising from unauthorised access, data breaches, the use of secure passwords and risks of phishing, malware, and synthetic content, including deepfakes.[1]
Processes and mechanisms for incident reporting	• Ukraine lacks a specialised mechanism for reporting AI-related incidents or failures in the public sector. AI incident reporting helps identify risk patterns and build an understanding of the complex nature of AI-related incidents and hazards, making it a key tool for promoting trustworthy AI (OECD, 2025[37]). There is no formal requirement for government agencies to log or disclose when an AI system malfunctions, produces a significant error or causes harm (OECD, 2025[23]). This means that if an automated decision system in social services wrongly denies someone benefits, the individual should appeal through administrative procedures or notify the Human Rights Ombudsman (Digital Security Lab Ukraine, 2024[35]). The OECD has developed a common framework for AI incident reporting (OECD, 2025[37]) and actively tracks and documents such incidents to provide insight to policymakers, AI practitioners, and stakeholders worldwide (OECD, n.d.[38]). As Ukraine works to align with the EU AI Act, developing a dedicated AI portal or database would be a relevant step, as no such system currently exists (Digital Security Lab Ukraine, 2024[35]; European Union, 2024[27]).
Transparency and explainability of algorithms	• Ukraine does not yet have an explicit mandate requiring algorithmic transparency or explainability of AI-informed decisions across the public sector. At the strategic level, transparency has gained traction as a guiding principle in Ukraine's AI strategy and policy documents (OECD, 2025[23]). The *Strategy for the Digital Development of Innovations until 2030* advocates for the transparency and explainability of algorithms primarily through its alignment with international AI ethics and regulatory frameworks and its promotion of accountable innovation practices (Government of Ukraine, 2024[6]). It promotes the development and deployment of AI and algorithms free from stereotypes, including through the integration of disaggregated data in GovTech, and open data initiatives. Additionally, the *2024 White Paper* also indicates an intention to adopt such provisions, promoting transparency tools and an algorithmic transparency standard (Government of Ukraine, 2024[7]). However, there is no mandate to publish information about all algorithms used by the government, nor a requirement that decisions informed by AI be explainable (OECD, 2025[23]). As Ukraine aligns with the EU AI Act, more concrete transparency obligations may emerge through direct or related laws, such as a modernised data protection law (European Union, 2024[27]). • Ukraine promotes transparency and explainability through AI guidelines for public servants. In practice, the MDT guidelines promote transparency and explainability by encouraging public servants to disclose AI use, explain how AI works, verify its outputs, and remain personally accountable (Government of Ukraine, 2025[34]). These efforts are grounded in both ethical principles and practical workflows that align with international standards for AI governance. As such, AI-driven services in e-government, such as the AI chatbot in the Diia app, often indicate that they are automated assistants (Government of Ukraine, 2025[39]). However, the guidelines are not legally binding and currently serve as a soft governance tool to build awareness and promote responsible practices. Systemic mechanisms, such as the creation of a public registry of algorithms used in the public sector and the formal adoption of these guidelines through targeted capacity-building programmes, are still absent (OECD, 2025[23]).
Automated decision-making (ADM)	• While no dedicated mechanisms exist, emerging practices in service delivery aim to ensure that appropriate automated decision-making (ADM) in the public sector remains under human control (OECD, 2025[23]). ADM – where an AI system makes decisions with little or no human intervention – is not explicitly regulated in Ukraine at present (OECD, 2025[23]). The government's roadmap reinforces this direction, emphasising the need to balance AI-enabled efficiencies with appropriate safeguards and ensuring that critical decisions are not left solely to algorithms (Government of Ukraine, 2024[7]). In practice, most public-sector AI applications in Ukraine still require human intervention before any final decision is made (OECD, 2025[23]). • Although platforms such as Diia have rapidly expanded the use of AI in digital services, there is currently no publicly available documentation of structured ADM oversight mechanisms, such as algorithm registries or formal human-in-the-loop (HITL) safeguards (OECD, 2025[23]). The AI guidelines for public servants promote important elements of human oversight, responsibility, and transparency in AI use, but they stop short of introducing binding requirements or establishing systemic ADM frameworks. As Ukraine works to align its data protection laws with the GDPR and the EU AI Act, it is expected to converge with emerging international standards that prohibit solely automated decisions in high-risk cases (European Union, 2024[27]).
Mechanisms in place to address skewed data	• Awareness and principles are in place, but there is currently no requirement for risk-based skewed data audits of AI systems used by the government. Ukraine acknowledges that AI systems can inadvertently perpetuate adverse outcomes, as it has begun to embed principles to avoid skewed data into its guidance documents (Government of Ukraine, 2024[7]). The *AI White Paper* and *Roadmap* already mention tackling risks such as adverse outcomes and misuse of AI (Government of Ukraine, 2024[22]). For instance, the AI guidelines for public servants approach skewed data reduction by prohibiting adverse outcomes, encouraging risk-aware use of AI, requiring human oversight, and embedding practices of verification and transparency. However, they stop short of introducing mandatory processes or technical tools (e.g., fairness metrics or algorithmic impact assessments) or mandatory skewed data audits (Government of Ukraine, 2025[34]). As Ukraine signed *the CoE's Framework Convention on AI* and moves to align with the EU AI Act, it is essential to make progress on training and testing data used in high-risk AI systems to ensure the data is relevant and accurate (European Union, 2024[27]).
Determining legal/regulatory compliance	• AI regulatory compliance in Ukraine is currently handled in an ad hoc manner, as there is no dedicated AI compliance authority or supervisory process in place yet. Compliance for AI development or procurement is managed through a combination of existing legal procedures and new advisory initiatives (OECD, 2025[23]). While Ukraine has not yet adopted an AI-supervisory body analogue to the EU AI Act, the country is proactively working towards an approach to creating such a structure (OECD, 2025[23]). In the meantime, Ukraine is setting up supportive mechanisms to strengthen oversight capacities. For example, the country is developing the Responsible AI Centre, a website platform that aims to inform the

Guardrails	Findings
	public and businesses about Ukraine's progress on AI regulation, access to official documentation, and news on AI regulation (Government of Ukraine, 2024[22]). • Determining compliance for an AI project largely falls to the project owners, with partial oversight from the MDT. The *Concept of State Targeted Program on AI* (2024) identified the lack of clear criteria for compliance checks and control mechanisms as a key issue to address (Government of Ukraine, 2024[29]). As an interim step, Ukraine has developed an AI Voluntary Code of Conduct to foster a culture of self-regulation, which is currently being adopted by organisations (Government of Ukraine, 2024[22]). This conduct aims that AI systems operate ethically, ensure fairness, protect human rights, and build public trust (Government of Ukraine, 2024[22]).
Audits and regulatory inspections	• Ukraine does not yet have a dedicated regime for auditing AI systems or conducting regulatory inspections in the public sector. Currently, there is no authority routinely auditing government AI systems for compliance or performance (OECD, 2025[23]). This is an acknowledged gap, as the AI Roadmap envisions a regulatory body that would assume such responsibilities (Government of Ukraine, 2023[24]). There have been a few instances hinting at audit-like scrutiny. For example, the procurement monitoring AI (DOZORRO) used by civil society to flag corrupt tenders was effectively auditing government procurement decisions using machine learning (Digital Security Lab Ukraine, 2024[35]). Looking ahead, the compliance mechanisms to be introduced with EU-aligned AI legislation will likely include a mandate for regulators to inspect AI systems, require documentation, and enforce corrections or bans on non-compliant systems (European Union, 2024[27]).
Procurement and partnership processes for 3rd party solutions	• Although innovation procurement is emerging, current procurement rules have yet to address the specific challenges of AI systems. While the AI roadmap suggests ensuring public-private partnerships in AI are managed securely, there are no specific clauses or standards required in tenders that relate to AI ethics, performance, or risk management (OECD, 2025[23]; Government of Ukraine, 2024[22]) (see more in What enablers are in place for the use of AI in government?). However, the country is beginning to explore innovative procurement approaches to increase the adoption of AI in government. As part of the Digital Innovation Development Strategy until 2030 - WINWIN, the country aims to further develop procurement capacities through procedural standards for the entire software development cycle, as well as for the initiation, procurement, sale and launch of digital products (Government of Ukraine, 2025[30]).

Where to focus next

While Ukraine has made progress in using AI in government, substantial gaps remain in monitoring and oversight, and risk management. The MDT and its Expert Committee currently provide strategic oversight for AI initiatives, but Ukraine has not yet established a dedicated AI supervisory body or a central registry of government AI systems (Government of Ukraine, 2024[7]). This limits the country's capacity to ensure consistent accountability and enforce standards on a large scale (OECD, 2025[1]). As AI deployment in public services expands, Ukraine is prioritising and working on the creation of a dedicated oversight and regulatory body with enforcement powers, as envisioned in its *AI Regulation Roadmap (2023)* (Government of Ukraine, 2024[22]). Improving central monitoring, such as through the recurrent mapping of AI initiatives currently conducted by the MDT, would help Ukraine prepare for future binding legislation aligned with the EU AI Act. This approach could support the consistent identification of risks and promote greater transparency and accountability in the use of AI and algorithmic systems (European Union, 2024[27]; OECD/UNESCO, 2024[40]).

Another priority area is the development of binding cross-sectoral guidelines for the design, development, and management of AI systems in public service delivery. While Ukraine has introduced initial soft law instruments, such as the guidelines for public servants and voluntary codes of conduct, there are still no legally binding operational standards required for public agencies to manage high-risk AI systems consistently (Government of Ukraine, 2024[7]; OECD, 2025[23]) This gap may hinder responsible deployment, especially in high-impact sectors (OECD, 2025[1]). Similarly, although innovation procurement is emerging, AI solutions have not yet been tailored to address the specific risks and requirements of AI technologies (OECD, 2025[23]) (see more in What enablers are in place for the use of AI in government?). Ukraine could update procurement frameworks to include AI-specific safeguards and integrate international best practices into upcoming GovTech initiatives to ensure that third-party AI systems align with the public sector's values of fairness, transparency, and trust (OECD, 2025[1]).

Box 6.7. Ukraine's Roadmap for AI Regulation (2023)

Ukraine's Roadmap for AI Regulation outlines a phased and bottom-up strategy aimed at ensuring the trustworthy use of AI (Government of Ukraine, 2023[24]). Developed by the Expert Committee on the Development of Artificial Intelligence in collaboration with the Ministry of Digital Transformation, the roadmap was developed through multi-stakeholder consultations that involved representatives from business, academia, civil society, and policymakers. Drawing from global best practices and anticipating the adoption of the EU AI Act, the roadmap aims to position Ukraine to align its AI governance with international norms while protecting the rights of citizens and promoting innovation (Government of Ukraine, 2023[24]). An emphasis is placed on the responsible integration of AI in public services, ensuring that solutions are safe, fair, and transparent before they are scaled across government.

The roadmap is structured into two phases (Government of Ukraine, 2024[22]; Government of Ukraine, 2023[24]):

Phase I (2023–2026) focuses on preparatory measures, including:

- Development of a White Paper on AI Regulation.
- Soft laws and introduction of specific guidelines, including for civil servants.
- Introduction of voluntary codes of conduct.
- Launch of a sandbox for safe AI and Blockchain experimentation.
- Participation in the HUDERIA project to assess the human rights risks of AI.
- Development of the Responsible AI Centre to inform regulatory updates.
- Implementation of the Trusted Flaggers initiative to identify AI human rights violations.
- Update of Ukraine's National AI strategy by 2030.

Phase II (from 2026 onward) will involve the gradual adoption of legally binding AI legislation aligned with the EU AI Act, as well as the establishment of a dedicated AI regulatory body.

The roadmap prioritises giving businesses and public organisations the tools to self-regulate and prepare for future compliance based on principles of service delivery, partnership, and global alignment. Key principles include (Committee on AI in Ukraine, 2023[41]):

- Service function: supporting innovation and public value before enforcement.
- Balance: learning from global regulatory experiments before implementing domestic rules.
- Self-regulation: co-developing norms with industry and public service institutions.
- Global perspective: ensuring Ukrainian AI products and services are export-ready.
- Product approach: focusing on practical tools for market access and compliance.

Box 6.8. OECD AI Principles

The OECD AI Principles provide a framework for the development and deployment of trustworthy AI that respects human rights and democratic values. These principles, first adopted in 2019 and updated in 2024, serve as an intergovernmental standard to guide policymakers and AI actors in shaping AI policies that maximise benefits while mitigating risks. They emphasise international co-operation and interoperability, ensuring AI systems contribute to economic growth, social welfare, and environmental considerations. Currently, the European Union, the Council of Europe, the United States, the United Nations, and other jurisdictions incorporate the OECD's definition of an AI system and its lifecycle into their legislative and regulatory frameworks. These principles, along with the definition and lifecycle, are integral components of the OECD Recommendation on Artificial Intelligence.

Value-based principles

The OECD AI Principles promote AI that is innovative, trustworthy, and human-centric. They include:

- Growth and well-being that benefits all groups in society: Stakeholders should proactively engage in responsible stewardship of trustworthy AI in pursuit of beneficial outcomes for people and the planet.
- Human rights and democratic values, including fairness and privacy: AI actors should respect rule of law, human rights, democratic and human-centred values throughout the AI system lifecycle.
- Transparency and explainability: AI Actors should commit to transparency and responsible disclosure regarding AI systems.
- Robustness, security, and safety: AI systems should be robust, secure and safe throughout their entire lifecycle.
- Accountability: AI actors should be accountable for the proper functioning of AI systems and for the respect of the above principles.

Recommendations for policymakers

To ensure AI is trustworthy and beneficial, policymakers are encouraged to:

- Investing in AI research and development: Governments should support long-term public and encourage private investment in interdisciplinary R&D to drive trustworthy AI innovation.
- Fostering a responsive AI-enabling ecosystem: Governments should develop dynamic, durable, and interoperable digital ecosystems for trustworthy AI.
- Shaping an enabling interoperable governance and policy environment for AI: Governments should create agile policies that support the shift from AI research to real-world deployment.
- Building human capacity and preparing for labour market transitions: Governments should equip people with skills to use AI effectively and adapt to changes in the world of work and society.
- International co-operation for trustworthy AI: Governments and stakeholders should collaborate globally to uphold and advance trustworthy AI principles.

Source: (OECD, 2024[42])

Box 6.9. International cases: Proactive transparency instruments

Transparency around government use of AI is critical to maintaining democratic accountability, building public trust and enhancing internal knowledge-sharing around the technology. However, globally, many public sector institutions lack sufficient understanding and visibility into their own AI use, significantly hindering these objectives. Effective transparency measures enable governments to proactively inform citizens and stakeholders about AI systems without being prompted by requests.

Several countries have implemented proactive transparency measures, including public registries of AI systems. These registries serve as centralised, publicly accessible repositories detailing AI systems deployed by government institutions, their purpose, relevant sectors and jurisdictional coverage. Some of examples include:

- Colombia's dataset on automated decision systems in the Colombian public administration,
- The UK's Algorithmic Transparency Records,
- National government public algorithm inventories in Chile, France and the Netherlands Public Algorithms Inventory, and
- Sub-national algorithm registers Amsterdam, the Netherlands and Helsinki, Finland.

Publishing algorithm source code and documentation has similarly emerged as a measure of transparency. The practice of open sourcing the code for public algorithms is widely regarded as a best practice in algorithmic transparency. This is particularly beneficial for technical and expert audiences, as it enables them to examine, test and verify how these systems operate, which could in turn promote accountability and trust. Some efforts are still short of releasing the full source code but require public sector institutions to publish detailed documentation that can have a similar effect.

- In France, the Digital Republic law mandates government agencies to "make publicly available, in an open and easily re-usable format, the rules defining the main algorithmic processing used in the accomplishment of their mission when such processing is the basis of individual decisions".
- The UK's the Algorithmic Transparency Recording Standard (ATRS) mandates public sector organisations to transparently disclose details about their use of algorithmic methods in decision-making processes.
- In Canada, the Directive on Automated Decision-making explicitly outlines, in detail, explainability requirements for AI systems differentiated by levels of risk, determined by use of an Algorithmic Impact Assessment tool (the results of which must also be published). As of 2025, the tool has matured into a robust, risk-aware system, enhancing systemic oversight and promoting responsible use across the public sector.

Source: (OECD, 2025[1])

Box 6.10. White Paper on Artificial Intelligence Regulation in Ukraine (2024)

In June 2024, Ukraine's Ministry of Digital Transformation released the *White Paper on Artificial Intelligence Regulation in Ukraine*, outlining a strategic framework for AI governance, building upon the previously published AI regulation roadmap (2023) (Government of Ukraine, 2023[24]). This document emphasises a phased and bottom-up approach to regulation, fostering self-regulation and innovation while preparing for alignment with the European Union's AI Act (Government of Ukraine, 2024[7]). The strategic goals and key initiatives for service delivery outlined in the document are as follows:

Strategic goals:

- Enhancing AI industry competitiveness: Equip Ukrainian businesses to compete globally and integrate into international markets.
- Safeguarding citizens' rights: Protect individuals from potential risks and misuse related to AI.
- European integration: Harmonise Ukraine's AI regulations with EU standards to facilitate seamless integration.

Key tools and initiatives for service delivery:

- Sandbox: Establishing a controlled environment where AI technologies can be tested within public services under regulatory oversight enables the assessment of AI applications' impact on service delivery and user experience before broader implementation.
- AI system evaluation methodology: Develop a risk-based assessment framework to categorise AI systems by their impact on human rights and society, including voluntary AI labelling for public institutions. This initiative aims to inform citizens about the involvement of AI, fostering trust and understanding.
- Sector-specific guidelines: Development of AI design and management guidelines for integrating AI into various policy sectors, ensuring that AI applications align with ethical standards and effectively meet public needs.

Monitoring and oversight

Centralised bodies or tools can support monitoring and oversight of the ethical, transparent, and effective use of AI technologies across government. Oversight bodies in the non-executive branch of government can support ensuring the consistent application of AI regulations and policies by ensuring compliance with legal and ethical standards through ex-post evaluations and audits (OECD/UNESCO, 2024[40]). Oversight bodies in the executive function can support managing risks, addressing ethical concerns, and streamlining the adoption of AI by monitoring AI projects at a large scale (OECD, 2024[2]).

Ukraine has not yet established a non-executive body to oversee AI solutions, although it is developing a concept for a unified digital regulator as envisioned in the country's AI roadmap (Government of Ukraine, 2024[22]) (see more in Box 6.11). Executive supervision is currently carried out by the Cabinet of Ministers, the MDT and its Expert Committee, which coordinates AI initiatives but lacks monitoring authority (Government of Ukraine, 2024[7]). The Expert Committee provides strategic guidance, and monitors select government AI projects (OECD, 2023[43]; IFES, 2024[28]) (see more in Table 6.2). EU member states have adopted varied models for overseeing the use of AI in the public sector, combining institutional independence with expert involvement to uphold ethical and legal standards (OECD, 2025[44]). In France, multiple authorities have been tasked with protecting fundamental rights in line with the EU AI Act, ensuring AI systems align with ethical and regulatory standards (OECD, 2025[44]). Hungary has created the AI Coalition, led by the Ministry of Innovation and Technology, which brings together public institutions, academia, and industry to guide AI deployment (OECD, 2025[44]). Ireland follows a decentralised model,

delegating enforcement responsibilities to sector-specific regulators while assigning overarching supervisory roles to designated authorities (OECD, 2025[44]). Though tailored to each country's governance system, these approaches share a common goal: fostering responsible AI innovation while ensuring transparency, safety, and accountability.

Box 6.11. Ukraine's efforts towards a unified digital regulator

To align with the EU AI Act and national objectives outlined in the AI Regulation White Paper, Ukraine is advancing plans to establish an independent regulatory body for the digital sector. Ukraine is currently developing a concept for a unified digital regulator, which will include financial estimates and technical specifications.

The proposed institution, the National Commission for the State Regulation of Digital Spheres (provisional name), is expected to function as an independent central executive body with special status, ensuring autonomy in decision-making. Its mandate would span a broad range of areas requiring regulatory oversight, including artificial intelligence, digital services and markets, data governance, public information access, and online child protection.

This unified authority is envisioned as a practical response to the complexity of implementing EU digital regulations, offering an integrated solution that avoids the inefficiencies of creating multiple specialised agencies. It aims to meet EU standards for regulatory bodies, including independence, transparency, impartiality, and adequate financial, technical, and human resources.

The Draft Law on the Digital Regulator is expected to be adopted by the end of 2026. To support its effective establishment and alignment with the EU AI Act, Ukraine will benefit from closer collaboration with EU institutions, participation in the European Artificial Intelligence Board, and access to technical assistance programmes to support implementation of best practices in AI oversight. Building institutional capacity will be essential to ensure effective regulation across interconnected digital domains as Ukraine advances toward EU membership.

Source: (OECD, 2025[23]; Government of Ukraine, 2024[7]; European Commission, 2024[45]).

Tools for monitoring, transparency standards, and skewed data detection can also support effective oversight of AI use in the public sector. Monitoring tools to assess the effectiveness and phased deployment of AI investments can help to align AI applications with objectives and identify opportunities for scaling across government (OECD/UNESCO, 2024[40]). Countries are deploying tools to ensure that AI systems do not amplify issues arising from skewed data or introduce new safety risks (OECD/UNESCO, 2024[40]). These measures enhance algorithmic transparency, which is crucial for effective AI oversight. Additionally, AI impact assessment frameworks can save human, financial, and environmental resources, boost service quality and trust, and ensure relevance and context (OECD/UNESCO, 2024[40]; OECD, 2025[1]). Ex-ante and ex-post impact assessments help predict consequences, mitigate risks, prevent harm, engage citizens, and tackle societal challenges (OECD, 2024[2]; OECD, 2025[1]).

Ukraine has begun developing tools related to monitoring, transparency, and identifying issues linked to skewed data in AI systems, but these remain at a nascent and mostly non-binding stage**.** The country has not yet established a dedicated executive function to monitor AI solutions across the public sector; however, the MDT is currently carrying out AI mapping exercises to track and coordinate AI use within government (Government of Ukraine, 2024[22]). However, current strategic documents and guidelines for public servants endorse transparency as a guiding principle, and there are intentions to adopt algorithmic transparency tools and standards (Government of Ukraine, 2024[7]). Moreover, the country has acknowledged the challenges associated with skewed data in AI systems and has embedded principles

aimed at preventing adverse outcomes in its guidance documents (Government of Ukraine, 2024[7]) (see more in Table 6.2). Ukraine can learn from the *UK's Model for Responsible Innovation* which supports public sector teams in responsibly developing and deploying data-driven technologies and AI (Box 6.12).

Box 6.12. International cases: UK's Model for Responsible Innovation

The Model for Responsible Innovation, developed by the UK's Responsible Technology Adoption Unit (RTA) within the Department for Science, Innovation and Technology, is a hands-on tool to help public sector teams innovate responsibly with data and AI. It was developed through testing and consultation across various government departments and is now publicly available to support the adoption of ethical AI, aligning with the OECD principles for trustworthy AI.

The RTA team utilises the model to conduct free red-teaming workshops, enabling public sector teams to rapidly identify and address risk issues in their AI use cases. These workshops have already been applied in policy sectors such as justice, health, social care, and energy, helping teams refine their tools before deployment. The model aims to establish justified trust in AI systems, particularly those that have a significant impact on the public. It achieves this by guiding teams through eight core fundamentals of responsible innovation:

- Transparency: Open systems and explainable decisions
- Accountability: Clear governance and responsibility
- Human-centred value: Systems designed to benefit people
- Fairness: Equitable outcomes and processes
- Privacy: Protection of personal data
- Safety and security: reliable, robust, and non-harmful tools
- Societal well-being: systems that support the public good

These are supported by six conditions: from meaningful engagement to robust technical design and effective governance, that must be met to ensure public services powered by AI remain fair, ethical, and fit for purpose.

The model is instrumental in service-delivery purposes, helping teams working on chatbots, automated eligibility systems, or data-linking platforms to identify ethical risks early and apply mitigation strategies. Tools such as the *DESNZ Project Delivery Chatbot and the Better Outcomes through Linked Data (BOLD) programme* have benefited directly from this approach.

Source: (UK Government, 2024[46])

Guidelines on the design, development, and management of AI in government

AI guidelines for public sector organisations provide a structured framework to ensure that AI applications are implemented responsibly, ethically, and effectively (OECD/UNESCO, 2024[40]). These guidelines are crucial as they help maintain public trust, ensure compliance with legal and ethical standards, and promote transparency and accountability in AI systems (European Commission, 2024[47]). By offering clear guidance on best practices, risk management, and ethical considerations, such guidelines facilitate the adoption of AI for public service delivery by enhancing efficiency, improving decision-making, and ensuring that AI systems are aligned with public needs (Government of Sweden, n.d.[48]; OECD/UNESCO, 2024[40]).

Ukraine's non-binding AI guidelines for public servants represent a significant first step in building public sector AI governance. Developed as part of a broader White Paper on AI regulation (Government of

Ukraine, 2024[7]), they aim to equip public servants with practical and ethical principles for responsible AI use. The document emphasises human rights, data protection, and ethical conduct (Government of Ukraine, 2025[34]). It offers practical advice on prompt creation, the use of generative AI tools, and AI literacy, along with guidance on cybersecurity hygiene and risk management, while referencing international standards (Government of Ukraine, 2025[34]).

Box 6.13. International cases: Sweden's Guidelines for generative AI in public administration

Ukraine can learn from Sweden's approach to improving AI adoption through public sector-specific guidelines. Developed by the Swedish Agency for Digital Government (Digg) and the Swedish Authority for Privacy Protection (IMY), these guidelines provide a comprehensive framework to ensure the responsible and effective use of AI technologies (Government of Sweden, 2025[49]). Within 18 guidelines, the framework covers 7 dimensions: management and responsibility, data protection and personal data processing, labour law, procurement, information security, copyright, and ethics (Government of Sweden, n.d.[48]).

The management and responsibility dimension emphasises the need for clear accountability and governance structures to oversee AI projects. Data protection and processing compliance are crucial to ensure that AI systems respect individuals' privacy rights. Labour law considerations address the impact of AI on the workforce, ensuring fair treatment and upskilling opportunities. Procurement guidelines ensure that AI solutions are acquired transparently and ethically, while information security measures protect AI systems from cyber threats. Copyright guidelines address the use of AI-generated content, and ethical considerations ensure that AI applications align with societal values and human rights (Government of Sweden, n.d.[48]).

To support the adoption of these guidelines, Sweden has developed complementary materials and capacity-building initiatives (Government of Sweden, 2025[49]). These include webinars aimed at increasing the competence of public sector employees in handling AI technologies. Additionally, the guidelines are continuously updated to reflect the latest developments in AI technology and legislation. The establishment of a dedicated website serves as a central hub for all information related to AI in the public sector, providing access to guidelines, best practices, and other resources (Government of Sweden, n.d.[48]).

While these guidelines are a critical entry point, they remain largely individual-focused and voluntary in nature. To strengthen public trust, ensure safety, and enable the scalable deployment of AI in government, Ukraine should transition from individual public servant-level guidance to a comprehensive organisational-level approach, including capacity-building support. Ukraine can learn from international guidelines such as the G7 Toolkit for Artificial Intelligence in the Public Sector. This toolkit offers practical insights and good practices for AI use, integrating ethical considerations and showcasing public sector AI use cases (OECD/UNESCO, 2024[40]). Similarly, Governments such as Sweden, the UK, and the US have developed national organisational guidelines and playbooks to ensure compliance with AI standards (Box 6.13).

Institutionalising experimentation practices is equally important. Beyond providing guidance, Ukraine could also embed structured AI experimentation spaces and practices across the public administration. Spaces such as sandboxes, labs, and innovation units support the testing and diffusion of these practices, enabling the safe and iterative experimentation of AI systems, the co-design of solutions with users, and the systematic collection of evidence to inform decisions on scaling up innovations (see Box 6.14). However, institutionalising such practices through organisational-level guidelines also helps ensure that experimentation is not ad hoc or confined to specific spaces but becomes a sustained capacity within innovation processes across government, while also creating permission to take balanced risks.

Box 6.14. The use of AI across the innovation process in government

Innovation teams within public administrations are increasingly adopting AI across the innovation cycle, from research and ideation to prototyping, implementation and evaluation. The OECD is working on a forthcoming publication that will present a collection of practices, including evidence from countries such as Austria, Chile, Korea, the UK, Singapore, Ukraine, and others. Current evidence shows that AI can complement innovation teams in five distinct roles with various practices:

- Insight finder: Accesses, aggregates, and analyses large datasets to frame problems, benchmark performance, and design evaluation strategies.
- Pattern detector: Interprets structured and unstructured data to reveal correlations, outliers, and trends that inform decision-making.
- Idea booster: Supports creative and strategic thinking by proposing innovative concepts, framing trade-offs, and offering alternative models.
- Scenario tester: Simulates outcomes of policy options or prototypes, stress-testing designs and reducing uncertainty.
- Message shaper: Tailors and delivers information clearly through stakeholder mapping, visualisation, and persuasive communication.

Innovation cycle	AI practices
Research	- Insight finder: NLP to scan large datasets and identify policy challenges - Pattern detector: Detects patterns in stakeholder sentiment and risks
Ideation	- Idea booster: Generates new policy ideas from global databases - Message shaper: Visualises trade-offs for decision-making
Prototyping	- Scenario tester: Simulates user journeys and system dynamics - Message shaper: Creates mock-ups and visual demos
Implementation	- Scenario tester: Models scale-up scenarios for pilots - Message shaper: Designs adoption campaigns and training content
Evaluation	- Scenario tester: Predicts long-term policy impacts and risks - Insight finder: Prepares interactive dashboards for monitoring and learning

AI roles are not confined to one stage. For example, insight finding and pattern detection are central to research and evaluation, while idea boosting and scenario testing are critical during ideation and prototyping. Message shaping is a cross-cutting role that strengthens communication at all stages.

However, for AI to deliver its full value across innovation processes and their outcomes, governments also need to address enabling conditions such as:

- Data and technology availability, including access to reliable, interoperable, and proprietary datasets.
- New competencies, including AI literacy and reinforced innovation skills across the public workforce.
- Ethics and accountability frameworks to safeguard transparency, fairness, and trust in AI-enabled processes.
- Evaluation mechanisms to measure the effectiveness and long-term impacts of innovations, including AI-powered solutions.

Source: (OECD, 2026, forthcoming[2])

Procurement

Procurement processes for third-party AI solutions in the public sector involve the systematic acquisition of AI applications from external vendors (Monteiro, Hlacs and Boéchat, 2024[50]); (OECD, 2024[51]). These processes are crucial as they ensure that AI solutions are selected based on clear criteria, including ethical standards, transparency, and compliance with legal requirements (Monteiro, Hlacs and Boéchat, 2024[50]). Moreover, innovative procurement mechanisms such as GovTech programmes can support the adoption of AI in government by streamlining the participation of startups and cutting-edge SMEs, problem-driven procurement, facilitating experimentation and piloting, embedding ethical and performance standards early, and promoting collaborations within innovation ecosystems (OECD, 2025[1]; OECD, 2024[51]).

Although innovation procurement is emerging in Ukraine, current procurement rules have yet to address the specific challenges of AI systems. While the AI roadmap highlights the need to manage public-private partnerships in AI securely, current tender processes lack specific clauses or standards addressing AI-related ethics, performance, or risk management (OECD, 2025[23]; Government of Ukraine, 2024[22]) (see more in What enablers are in place for the use of AI in government?). However, the country is beginning to explore innovative procurement approaches to increase the adoption of AI in government. As part of its *Digital Innovation Development Strategy until 2030 – WINWIN (2024),* Ukraine aims to establish a variety of different types of GovTech initiatives, including a dedicated GovTech programme to support the procurement of third-party innovative solutions (Government of Singapore, 2025[52]). OECD countries are increasingly developing targeted guidelines to support responsible and innovative AI procurement. For instance, the UK government has introduced policies and guidelines to manage AI procurement, ensuring that AI systems are safe, minimise risks related to skewed data, and respect privacy (UK Government, 2020[53]). Similarly, Singapore's National Artificial Intelligence Office has developed AI procurement frameworks to ensure the responsible use of AI in public services, and it collaborates on research to create solutions that are not yet commercially available (Government of Singapore, n.d.[54]) (Box 6.15).

Box 6.15. International cases: Singapore's Procurement and Research Mechanisms

Ukraine can learn from Singapore's approach to a structured procurement process and established research collaboration programme. The Singapore Public Sector AI Playbook provides a robust guide for government agencies to adopt and implement AI technologies effectively through procurement and applied research.

The *Procure from the Industry* mechanism outlines the Green Lane Procurement approach, which allows agencies to procure technology products and services from firms qualified under GovTech-endorsed programmes. This approach aims to improve process efficiency during tender and quotation evaluations, and support the growth and scaling of Singapore-based tech companies and startups. If these tender offerings are unsuitable, agencies can explore other sourcing methods.

The playbook also offers a mechanism for *Research Collaboration* to develop AI solutions for complex and unique problems. The initiative supports experimental projects through an established programme where an AI minimum viable model can be developed and deployed within 9 to 18 months, providing matching funds of up to $250,000 per project. The programme aims to create AI models that can be later integrated, deployed, and maintained by GovTech or in partnership with commercial solution providers. Research grants are also available for deployment and scalation of tested solutions.

Source: (Government of Singapore, n.d.[54])

How are various stakeholders being engaged to support the use of AI in government?

The engagement dimension considers who governments should engage with when developing and implementing the enablers and guardrails, as well as the development and use of AI systems. It includes the different stakeholders that should be engaged in building the foundations for a responsible use of AI in the public sector. In addition to the internal and external users of the AI systems, it also considers the various actors across (including other parts of the public sector, the private sector, civil society, academia, the public, etc.) to be engaged through targeted actions to effectively address policy challenges related to the use of AI in the public sector.

Progress to date

Ukraine's notable progress on the use of AI in the public sector has been underpinned by active engagement with various stakeholders, including partnerships with the international community for AI. The government has recently established the WINWIN AI Centre of Excellence to serve as an international hub for AI integration in public services. The Centre could play an important role in bringing a variety of different types of actors together to develop, experiment and test AI services. For instance, the Centre plans to gather project proposals from both the public and private sectors and leverage internal and external expertise to pilot AI services to meet the public's needs. In addition, the Expert Committee on the Development of AI in Ukraine (see Table 6.1) brings together experts from the public and private sectors, academia and civil society to increase Ukraine's competitiveness in the area of AI.

Moreover, Ukraine's advances in digital government and AI have also opened avenues for international partnerships. Many of Ukraine's AI initiatives have been informed by the expertise and experience of peer countries, including the UK, Estonia, Sweden and Switzerland. Multilateral organisations such as the OECD and the UN have also played a supportive role in the development of Ukraine's AI policies and practices, bringing a broad range of lessons learned and practices from the international community (OECD, 2025[23]). Furthermore, Ukraine has contributed to international discourse and standard setting around AI. For instance, Ukraine has contributed to the development of the Council of Europe's Framework Convention on AI and the HUDERIA Methodology to assess the impact of AI systems on human rights (Government of Ukraine, 2023[24]), and is currently conducting a mapping of AI initiatives across the public sector with the support of the Council. Table 6.3 presents some of Ukraine's key engagements around AI.

Table 6.3. How are various stakeholders being engaged?

The table below assesses the engagement practices that should be in place to strengthen the use of AI in government.

Engagement	Findings
Engagement with internal users	• Other than the coordination efforts mentioned in Table 6.1, concrete practices on how Ukraine is engaging with internal users have not been evidenced.
Engagement with external users on AI solutions (inc. users, private sector, civil society, academia, etc.)	• Ukraine has actively engaged external stakeholders, including the private sector, academia and civil society. It has also established collaborative relationships with large AI platforms such as OpenAI, AWS, Microsoft and Google, with the aim of leveraging their expertise and resources (OECD, 2025[23]) • Consultation and inclusion of academia and civil society: Ukraine has engaged external stakeholders in setting its strategic approach and designing policy around AI through consultations and partnerships. For instance, the *Expert Committee on AI Development* included academic figures and industry leaders whose insights inform the development of the national strategy. The Committee's main mandate also included growing the AI talent pool in Ukraine. In addition, the MDT has engaged civic tech NGOs and digital rights groups when formulating the White Paper on AI regulation, aiming for a balanced approach that addresses societal risks and ethics. • Public-Private and tech community collaboration: The recently launched the *WINWIN AI Centre of Excellence* is expected to facilitate collaboration among the public sector, the private sector and academia on designing and delivering AI services. This will allow AI startups and companies to propose and build pilot services addressing public sector needs. Specifically, a concrete example to demonstrate engagement with external users is the first national educational mobile application, Mriia. The service is designed as a comprehensive digital learning

Engagement	Findings
	ecosystem for students, parents and teachers. Developed jointly by the MDT and the Ministry of Education with international support from the *E-Governance for Accountability and Participation Program (EGAP)*, the service had undergone beta testing in schools across Ukraine, engaging various users in its trial (European Union, 2024[56]).
Engagement across borders	• Participation in international AI initiatives: Ukraine has actively sought international co-operation on AI to strengthen its capabilities and contribute to global discussions. For instance, Ukraine joined 26 countries and the EU in signing the Seoul Ministerial Statement for advancing AI safety, innovation and inclusivity at the AI Seoul Summit 2024 (Department for Science, Innovation and Technology, 2024[57]). • Bilateral and multilateral projects: Ukraine has benefited from and contributed to a range of international projects centred on AI. The most notable recent initiative is the WINWIN AI Centre of Excellence, which was initiated with support from the UK's Foreign, Commonwealth & Development Office (FCDO) and Deloitte UK. This partnership brought international expertise to design the centre and its programmes (Euporean Union, 2025[58]). Additionally, the Mriia app was supported by Switzerland through the EGAP. Similarly, the UNDP and Sweden funded the Diia.Education platform that host AI literacy courses. This demonstrates how international partnerships are aiding AI-driven public service improvements. • Mutual competitiveness in the area of AI: The government, together with the EU and the United Nation Industrial Development Organisation (UNIDO) launched a project in 2023 to map AI usage in Ukraine's priority sectors and crafted a roadmap for investment. This project emphasised that Ukraine is a strategic partner for Europe in AI innovation, underlining Ukraine's AI talent and applications (United Nations Industrial Development Organization, 2024[59])

Where to focus next

To sustain and expand stakeholder engagement at both national and international levels, Ukraine should consider systematically engaging them in all stages of AI initiatives and continue to leverage international expertise and support.

As Ukraine plans to deploy more AI-driven pilot projects across government, the government should consider conducting regular user testing and establishing feedback mechanisms throughout the development and use of these services. It is also important to engage civil society and experts in AI policy discussions and design. This will help ensure that AI-driven services benefit from a broad range of insights, are transparent and respect users' rights.

The *WINWIN AI Centre of Excellence* (Box 6.3) presents a great opportunity to systematically cultivate partnerships with the private sector, civil society and academia to co-create AI-driven services. It would be important to monitor the Centre's activities and report its progress and performance against defined objectives and goals transparently to the public. This would reinforce its legitimacy and secure continued support from both internal and external stakeholders. In addition, the Centre would be a great platform to provide a community of practice for the Ukrainian and international public sectors to share use cases and lessons learned (see international best practice on Box 6.16).

Box 6.16. International cases: UK's Community of Practice on AI

The UK has established a cross-government AI Community of Practice to support knowledge sharing, ethical awareness and collaboration around the use of AI in the public sector. This initiative responses to the growing need for public servants, regardless of their formal roles in AI, to better understand the implications, opportunities and challenges of AI in government.

The Community of Practice is open to all public sector employees with an interest in AI. Its purpose is to share information across departments, enabler peer-to-peer learning, and support the ethical and safe use of AI tools. The Community meets monthly online to discuss use cases, AI ethics and security.

Source: (Government of the UK, 2024[60])

Furthermore, deepening international co-operation through exchanges with partner governments and organisations remains essential, ranging from sharing best practices on using AI for public services to initiating joint pilot projects. Such cross-border engagements would not only support Ukraine's rapid public-sector transformation but also provide valuable practices for the international community on effectively deploying AI under challenging conditions. By fostering ongoing collaboration and alignment with international partners, Ukraine can ensure its AI-driven transformation is durable, secure and interoperable on a global scale.

How is the impact of AI solutions on government being monitored?

Building on the pillars of enablers, guardrails, and engagement, the monitoring and evaluation of AI use in government should be strengthened to ensure it delivers positive outcomes (OECD, 2025[1]). While many governments are running AI pilots and experiments, there is limited monitoring and evaluation to determine which projects are effective and impactful (OECD, 2025[1]). This makes it difficult to demonstrate return on investment (ROI) and identify which initiatives should be scaled or replicated (OECD, 2025[1]). The following analysis focuses on how AI solutions are monitored in relation to key service delivery objectives, such as enhancing internal operations, designing seamless and accessible services, measuring and improving service delivery, and supporting experimentation in service delivery, in alignment with the *OECD Recommendation of the Council on Human-Centred Public Administrative Services* (OECD, 2024[61]).This focus reflects AI's potential to boost quality and responsiveness in public service delivery. This section outlines Ukraine's current progress and identifies key remaining challenges.

Progress to date

Ukraine has emerging practices for monitoring the use of AI in the government's internal operations and service delivery design. As shown in Box 6.3, the *WINWIN AI Centre of Excellence* monitors experimental AI solutions in critical policy sectors. By 2025, the Centre had carried out 16 AI pilot projects, with half progressing toward minimum viable products (Government of Ukraine, 2025[62]). In service design, Ukraine has integrated AI into digital government platforms, such as *Diia*, prioritising seamless and accessible experiences. Emerging AI tools, including a virtual assistant for the *Diia* app, and an AI-powered consular spokesperson chatbot, are being evaluated for accuracy and responsiveness (UNN, 2024[63]; Government of Ukraine, 2024[64]). The government has also undertaken large-scale audits of digital accessibility, improving compliance with web accessibility standards (UNDP, 2024[65]). Within internal operations, AI-driven solutions developed by the MDT, such as the Digital Analysis of Legal Acts and AI analysis and translation of EU legislation, are assisting legal teams in analysing and monitoring regulatory documents (Government of Ukraine, 2025[66]).

AI practices are being developed to monitor service delivery performance and support experimentation. Table 6.4 explains that, while AI-specific performance tracking remains limited, Ukraine systematically measures user satisfaction and service efficiency. *Diia*'s data-driven approach helps refine digital services, and AI-assisted analytics are planned to enhance real-time feedback processing (UNDP, 2025[67]; OECD, 2025[23]). In social services and justice, AI pilots such as job-matching platforms for displaced persons and AI-assisted case sorting in courts are being tested for efficiency gains (Limantė and Moskvytyn, 2024[68]). Ukraine also fosters AI experimentation, ensuring that AI solutions undergo structured monitoring before scaling (Government of Ukraine, 2025[62]). The recently launched AI sandbox will provide support for adopting public-sector AI applications, allowing agencies to assess AI risks and ethical considerations (Government of Ukraine, 2023[24]). AI-driven services, such as the *Mriia Educational App*, which support students and parents in improving educational outcomes and reduce the administrative burden for educators, have successfully transitioned from pilot projects to consolidated solutions scaling to more than 2000 schools (Government of Ukraine, 2025[69]) (see more relevant initiatives in Box 6.17).

Box 6.17. Ukrainian cases: Use of AI in service delivery and public administration

Ukraine's efforts to integrate AI across the public sector, from administration to education and environmental protection, have aimed to enhance responsiveness, reduce manual workload, and align with EU integration and national strategic objectives. Several government initiatives illustrate this strategic shift toward AI-embedded public services, focusing on enhancing internal operations, and designing seamless and accessible services. Relevant examples, among others, include:

- **Diia AI Assistant - Ministry of Digital Transformation**: A conversational assistant that will be built into Diia's web and mobile platforms, which will help citizens navigate services based on life events, such as guiding users through obtaining a specific certificate or finding the nearest Administrative Services Centre (Government of Ukraine, 2025[70]). In the future, it will support document submission, track application progress, and offer voice interactions, enhancing accessibility and reducing user burden (Government of Ukraine, 2025[70]).
- **Mriia Educational App and Web Portal - Ministry of Digital Transformation with Ministry of Education**: Mriia is Ukraine's national educational app and web portal, designed for students, parents, and teachers. It offers smart scheduling, homework tracking, secure communication, and a rich content library, powered by AI-driven recommendations that tailor learning materials to each student's needs and interests (Government of Ukraine, 2025[69]). Launched in a pilot during September 2024 and now scaling to 2,000+ educational institutions, it aims to reduce the administrative burden for educators, automating tasks, such as timetable planning, and create a personalised, engaging learning experience for all users (Government of Ukraine, 2025[69]).
- **Diia.Education - Ministry of Digital Transformation**: This government platform provides relevant knowledge and skills, aiming to enable Ukrainian citizens to learn new professions in innovative formats and at no cost, including a track on artificial intelligence literacy (Government of Ukraine, 2025[71]). The web platform provides personalised content recommendations and enhanced learning engagement using AI (East Europe Foundation, 2023[72]).
- **National Ukrainian-Language LLM - Ministry of Digital Transformation**: Ukraine's Ministry of Digital Transformation, through its WINWIN AI Centre of Excellence and in collaboration with Kyivstar, has initiated the development of a national Ukrainian-language large language model (LLM) to enhance AI capacity and affirm digital sovereignty (Government of Ukraine, 2025[73]). The model is being trained exclusively on open-source Ukrainian data, including dialects, institutional terminology, and cultural references, and hosted entirely within national infrastructure to meet requirements for secure processing in sensitive sectors (Government of Ukraine, 2025[73]). Targeted for release by December 2025, the LLM is intended to support a range of public and private sector applications: digital assistants integrated into platforms such as Diia, tools for legal and legislative review, and personalisation functions within national educational technology systems (Government of Ukraine, 2025[73]).
- **Natalka Diia AI Chatbot - Ministry of Digital Transformation**: Natalka assists potential partners in integrating with the Diia platform. The chatbot answers routine questions and helps choose the appropriate integration path before escalating cases to human specialists when needed (The Odessa Journal, 2025[74]). In five months, it handled over 2,300 requests, reducing the workload of specialists by 30% (The Odessa Journal, 2025[74]).
- **HR Assistant for Job Vacancy Generation - Ministry of Digital Transformation**: Generates professional, well-structured job postings automatically, with creative ability where appropriate, saving time and ensuring consistency across public sector hiring (The Odessa Journal, 2025[74]).

- **Digital Expertise of Legal Acts - Ministry of Digital Transformation**: Currently under pilot, this AI system supports legal teams by rapidly analysing and uploading digital legal acts into central systems. Currently processes about 35% of such documents within 72 hours, improving review speed and consistency (The Odessa Journal, 2025[74]).
- **AI Analysis and Translation of EU Legislation - Ministry of Digital Transformation**: This AI-powered system scans Ukrainian laws, compares them with EU regulations, and flags alignment gaps, accelerating legal harmonisation critical for Ukraine's European integration (The Odessa Journal, 2025[74]).
- **Deep Green Ukraine - State Forestry Agency, Space Research Institute, and ForestCom NGO**: Combines satellite imagery with open data to detect illegal logging in near real time. Piloted in several regions, the tool maps forest loss, checks licensing, and enables faster enforcement (Digital Security Lab Ukraine, 2024[35]).
- **Victoria, AI Consular Spokesperson - Ministry of Foreign Affairs**: An AI-generated avatar delivers official consular updates via video, with human-authored scripts, ensuring accuracy (Government of Ukraine, 2024[64]). Accompanied by QR codes linking to verified text, Victoria increases transparency, frees diplomats for complex tasks, and ensures 24/7 public communication (Government of Ukraine, 2024[64]).
- **SkillLab, an AI Skill-to-Job Matching Platform - State Employment Service:** In collaboration with the Ministry of Economy, the Ministry of Digital Transformation, the Norwegian Refugee Council, and the World Bank, this AI-driven system captures users' skills and job experiences to match them with employment vacancies and training programmes (SkillLab, 2025[75]). Integrated with the Ukrainian State Employment Centre and Diia Single Sign-On, it has supported over 12,000 job seekers in finding new career paths (SkillLab, 2025[75]).

Source: OECD based on cited references.

Table 6.4. How is the impact of AI solutions being monitored across the government?

The table below assesses the measures that should be in place to monitor the impact of AI solutions for service delivery.

Impact	Findings
Monitoring AI in services internal operations	• Ukraine is still in the process of developing a comprehensive AI monitoring framework for government operations, though specific projects are already in place. AI is being used to streamline internal processes. For example, AI-driven solutions developed by the MDT, such as the Digital Analysis of Legal Acts and AI analysis and translation of EU legislation, are assisting legal teams in analysing and monitoring regulatory documents (Government of Ukraine, 2025[66]). • Ukraine has launched initiatives to monitor and guide AI adoption across government. The *WINWIN AI Centre of Excellence* coordinates AI integration across government, including key sectors such as defence, healthcare, and education (Government of Ukraine, 2025[62]). It also functions as an AI incubator, guiding experimental projects from prototype to deployment. As of 2025, 16 pilot AI solutions were being monitored and evaluated, with half expected to reach the minimum viable product stage (Government of Ukraine, 2025[62]).
Monitoring AI in designing seamless and accessible services	• Ukraine has robust service design practices, but as AI adoption grows, the country may require more specialised frameworks. A key pillar of its digital strategy is the Diia platform, which provides public services and digital documents via web and mobile (Government of Ukraine, 2025[39]). While most *Diia* services do not heavily rely on AI, the government prioritises user experience and accessibility, continuously tracking feedback through surveys and analytics to improve service design (UNDP, 2025[67]; OECD, 2025[23]). In 2024, positive experience with e-services reached 84%, up from 78.5% the previous year (UNDP, 2025[67]). • Ukraine has emerging practices for monitoring AI for seamless design. Announced in June 2024, a virtual AI assistant planned for *Diia*'s helpdesk has been launched in a beta test format. The AI tool offers 24/7 conversational chat support, enabling users to navigate services or resolve issues instantly (Government of Ukraine, 2025[70]). Initial tests showed 80% accuracy, and ongoing improvements aim to enhance its speed and reliability before full deployment (UNN, 2024[63]). Future developments of this AI tool include the possibility of voiced communication. Another AI-driven project is the Foreign

Impact	Findings
	Ministry's digital persona, *Victoria*, which serves as a consular information spokesperson (Government of Ukraine, 2024[64]). This AI avatar delivers official briefings to the media, aiming to free up diplomats' time while ensuring efficient communication. The government monitors its performance in real-time, focusing on maintaining accuracy and reliability (Government of Ukraine, 2024[64]). • Ukraine has also focused on monitoring digital accessibility. The government has systematically audited websites from 2020 to 2024 (UNDP, 2025[76]). Accessibility has steadily improved, with sites meeting medium to high-level standards increasing from 61 in 2021 to 79 in 2024, while poorly accessible sites decreased (UNDP, 2025[76]). The *Diia* platform and services sites have supported these improvements, following targeted efforts to enforce web accessibility guidelines (UNDP, 2025[76]).
Monitoring AI in measuring and improving service delivery	• Ukraine regularly tracks user-centric metrics and performance indicators, but AI-specific monitoring in service delivery remains limited and ad hoc. The government regularly assesses key indicators such as e-service uptake, user satisfaction, cost savings, and transparency improvements (OECD, 2025[23]; EU4DigitalUA, 2021[77]). While AI is not always directly involved, these measurement practices help establish a foundation for accountable AI use. For example, studies on *Diia*'s impact highlight significant efficiency gains. A 2021 evaluation found that residence registration time was reduced from three weeks to 24 hours, saving $56M annually (EU4DigitalUA, 2021[77]). • AI and data analytics are increasingly being applied to measure service delivery. The Diia app gathers user feedback through in-app surveys and support interactions, with plans to use AI to analyse feedback more efficiently and identify trends in real-time (UNDP, 2024[65]). In the justice sector, AI is being tested in Electronic Courts to sort claims using natural language processing, aiming to speed up case processing (Limantė and Moskvytyn, 2024[68]). In social services, AI-powered job-matching platforms like SkillLab assist displaced persons and the unemployed by matching their skills with employment opportunities (European Union, n.d.[78]).
Monitoring AI in experimenting with service delivery.	• Ukraine's AI experimentation in service delivery is well-supported, but consistent monitoring and evaluation will be crucial to scale pilots into effective services. The WINWIN AI Centre of Excellence plays a key role in this process, developing pilot AI solutions and supporting prototypes through an AI incubator (Government of Ukraine, 2025[62]). The centre aims to track each pilot's progress and impact, ensuring successful projects are scaled up (Government of Ukraine, 2025[62]). • Ukraine plans to monitor AI experimentation for service delivery through a product development environment. The country plans to establish an AI sandbox, a supervised testing environment where companies and public agencies can pilot AI applications safely (Government of Ukraine, 2024[22]).This will enable innovators to conduct voluntary risk assessments, receive guidance on ethical AI design, and ensure compliance with future laws (Government of Ukraine, 2023[24]). • Ukraine is monitoring and scaling AI experimental initiatives for service delivery. Chatbots for services and internal operations have been deployed during the war and are informing more advanced AI deployments in emergency services (UNN, 2024[63]). Another initiative is *DeepGreen*, an AI-powered tool that uses satellite imagery to detect illegal logging, developed with open data from the State Forestry Agency. Initially experimental, it is now an active monitoring tool (Digital Security Lab Ukraine, 2024[35]). The government's AI services also include Mriia, an education app with AI personalisation, and AI-driven data analysis tools for government use (EU4Digital, 2024[79]). These projects typically undergo small-scale trials and user testing phases before broader implementation (Government of Ukraine, 2025[62]). More case studies in Ukraine's adoption of AI in service delivery and government are outlined in Box 6.17.

Where to focus next

With ongoing investment in AI for measuring and experimenting with service delivery, Ukraine can enhance its AI-driven public services' efficiency, effectiveness, fairness, and accountability. While the country tracks some metrics, there is no standardised system for monitoring how AI affects their internal process results or service outcomes, such as error rates or efficiency savings, and evaluations often rely on project-specific KPIs (UNDP, 2025[76]; OECD, 2025[23]). Policy efforts acknowledge these gaps, aiming to introduce compliance standards and internal monitoring systems (Government of Ukraine, 2023[24]). Experimentation is emerging but often outpaces formal evaluation, with pilots such as chatbots or AI avatars being launched before publicly available impact assessments (OECD, 2025[23]). To ensure AI-driven services are trusted and effective at scale, Ukraine needs consistent risk-based evaluation frameworks, public reporting, and risk assessment, especially as it aligns with the EU AI Act (OECD, 2024[2]).

AI adoption for measuring and improving service delivery

Monitoring the impact of AI in public service delivery involves systematically evaluating how AI systems affect efficiency, effectiveness, and accessibility. This process relies on collecting and analysing data, user feedback, and performance indicators to assess the outcomes of AI-enabled services, both to identify what is working and to guide continuous improvement (OECD, 2024[2]). Effective monitoring ensures that AI tools enhance service quality, reduce administrative burdens, reach their intended users, and avoid

unintended consequences such as issues arising from skewed data, gaps in access, or system failures (OECD/UNESCO, 2024[40]). By grounding AI adoption in evidence, governments can optimise and scale successful solutions, build public trust through transparency, detect potential risks early, and promote ongoing policy learning and innovation (OECD, 2024[2]).

Ukraine tracks key user-centric indicators such as service uptake, satisfaction, and cost savings, though AI-specific monitoring remains limited and ad hoc. Existing measurement practices, such as those employed on the Diia platform, provide a foundation for more accountable AI use with demonstrated efficiency gains (OECD, 2025[23]; EU4DigitalUA, 2021[77]) (see more in Table 6.4). Ukraine could expand its use of systematic monitoring tools, such as a dedicated dashboard to track AI performance for service delivery (OECD, 2025[1]). While most countries do not currently monitor AI performance, countries such as Singapore have developed a whole-of-government monitoring dashboard to track the performance of government websites and digital services, including those enabled by AI (OECD, 2025[1]). The dashboard tracks website traffic, user feedback, and performance benchmarks, generating automated reports with key metrics to improve user experience (Government of Singapore, n.d.[80]) (see more in Box 6.18).

Box 6.18. International Example: Singapore's Whole-of-Government Application Analytics

Singapore's Whole-of-Government Application Analytics (WOGAA) is a centralised platform designed to monitor and enhance the performance of government websites and digital services.

WOGAA provides real-time tracking using Real User Monitoring (RUM) and Synthetic Monitoring tools, consolidating key metrics such as traffic, user feedback, and performance benchmarks into a single dashboard. This approach supports government agencies to assess their digital services, including those enabled by AI, identify areas for improvement, and streamline communication across public organisations. WOGAA enables agencies to make data-driven decisions that enhance user experience and service delivery by offering automated reporting on daily, weekly, and monthly metrics.

WOGAA utilises advanced analytics to evaluate how digital services and AI-powered tools engage with users, ensuring they meet predefined standards of accuracy, responsiveness, and accessibility. Additionally, WOGAA's Smart Sentiments Summary feature leverages AI to analyse user feedback in nearly real-time, helping agencies identify key issues to improve user experience.

Source: (Government of Singapore, n.d.[80])

AI adoption for experimenting with service delivery

Monitoring the impact of AI in experimentation in service delivery involves structured oversight of pilots or early-stage AI developments before they are scaled. AI-driven policies and services can be tested in controlled environments, such as regulatory sandboxes, AI incubators, or innovation labs, to evaluate their development, deployment, and performance. The goal is to understand what works, identify risks, and ensure AI solutions are scaled responsibly based on clear evidence (OECD, 2025[1]). Effective monitoring includes setting success criteria (such as effectiveness, balanced outcomes, and usability), tracking technical metrics (such as accuracy and error rates), collecting user feedback, and identifying unintended effects (such as issues linked to skewed data or gaps in access), and adjusting projects that fail to meet ethical, legal, or performance standards (OECD/UNESCO, 2024[40]; OECD, 2025[1]). This approach helps countries create safe spaces for innovation, manage risks, adapt regulations, and build public trust (OECD, 2024[2]).

Ukraine is emergingly monitoring AI experimentation initiatives for service delivery. Initiatives such as the *WINWIN AI Centre* incubate and monitor pilot projects to determine their readiness for scale-up

(Government of Ukraine, 2025[62]). The country has also launched an AI and Blockchain sandbox, providing an environment for testing and evaluating AI systems to promote safe and compliant development (Government of Ukraine, 2023[24]). Moreover, several AI pilot projects, such as chatbots for emergency services (UNN, 2024[63]), the *DeepGreen* monitoring tool (Digital Security Lab Ukraine, 2024[35]), and AI-powered education apps (EU4Digital, 2024[79]), are being monitored through testing and user feedback (see more in Box 6.17 and Table 6.4). Ukraine could benefit from more structured experimentation frameworks within its current AI sandbox and incubator, allowing for the systematic testing, evaluation, and scaling of AI solutions for service delivery. Best practices from OECD countries include the *UK's Regulatory Sandbox*, which helps organisations develop, monitor, and evaluate innovative, data-driven services while complying with data protection regulations (see more in Box 6.19) (UK Information Commissioner's Office, 2024[81]).

Box 6.19. International case: UK Regulatory Sandbox

Ukraine could benefit from the UK's example by establishing a similar regulatory sandbox to support and monitor public and private experimentation with AI. The UK Regulatory Sandbox, developed by the Information Commissioner's Office (ICO), is an initiative designed to support public and private organisations in creating innovative products and services that safely and responsibly utilise personal data (UK Information Commissioner's Office, 2024[81]). While monitoring experimentation of innovative solutions, this free service provides participants access to the ICO's expertise, helping them navigate data protection regulations and embed data protection by design into their projects (UK Information Commissioner's Office, 2024[81]). By fostering a controlled environment for experimentation, the Sandbox allows organisations to test:

- Innovations related to the UK Children's Code,
- Innovations related to data sharing (particularly within the health, central government, finance, higher and further education, or law enforcement sectors).
- Products and services exploring the use of innovative technologies, such as privacy-enhancing technologies and distributed ledgers.
- The service helps organisations to ensure compliance with the UK General Data Protection Regulation (UK GDPR) and the Data Protection Act 2018 (DPA 18) (UK Information Commissioner's Office, 2024[81]). This approach mitigates risks and promotes the development of AI solutions that are effective and ethically sound.

6.4. The way forward: an overview of sequenced recommendations for building an enabling environment for the responsible use of AI in public sector in Ukraine

Ukraine has made important strides in establishing the foundations for the trustworthy use of AI in the public sector, though many efforts are still in the early stages. As implementation advances, this section presents a set of sequenced policy recommendations – first by time horizon (immediate priorities feasible under current wartime and institutional conditions; recovery and reconstruction actions as capacity expands; and longer-term development reforms to align with OECD standards). As a second lens, each recommendation is also classified under the OECD Governing with AI Framework's four pillars: Enablers, Guardrails, Engagement, and Impact Monitoring. Building on Ukraine's ongoing digital transformation, these recommendations aim to promote the responsible and effective adoption of AI across the public sector.

Sequenced recommendations for strengthening Ukraine's AI adoption in government

Immediate priorities

Operationalise the ethical guardrails included in the strategic documents (Enabler)

- Engage civil society, academia and users to better understand their concerns around the use of AI in the public sector.
- Develop concrete initiatives to ensure the ethical guardrails are implemented to prevent or mitigate concerns, such as Canada's Algorithmic Impact Assessment tool (Box 6.9).

Strengthen Ukraine's AI skills development across the public service (Enabler)

- Ukraine has made important progress through NAUCS, the CDTO Campus, and Diia.Digital Education, but these initiatives could be expanded into a comprehensive AI skills framework.
- Develop a whole-of-government AI skills framework to clarify the different levels of AI literacy needed across the workforce (general users, managers/leaders, data and business experts, AI specialists).
- Expand AI training by scaling NAUCS programmes into continuous professional development and expanding the CDTO Campus curriculum to include strategic foresight, risk management, procurement, innovation and experimentation, and ethical oversight.
- Mainstream AI literacy through Diia.Digital Education, offering practical modules on generative AI, data security, identifying issues linked to skewed data, and prompt design, with tailored tracks for frontline AI system users.
- Strengthen talent pipelines and collaboration by creating multidisciplinary AI project teams, fostering communities of practice, and using flexible talent models (fellowships, secondments, GovTech partnerships) to attract and retain expertise.

Strengthen AI design and management (Guardrail)

- The MDT could prioritise the development of practical guardrails by focusing on transitioning from individual public servant-level guidance to a comprehensive organisational-level approach to guide the design and management of AI systems in government, including capacity-building.
- Develop AI guidelines for public sector organisations in partnership with experts in AI, law, ethics, and public administration, transitioning from individual public servant-level guidance to a comprehensive organisational-level approach, including associated capacity-building support.
- Align guidelines with OECD best practices and international standards, such as the Council of Europe's Framework Convention on AI, and the EU AI Act, covering governance, data protection, procurement, cybersecurity, copyright, and ethical use.
- Conduct public consultations and implement the guidelines through training programmes and workshops.

Engage a broad variety of stakeholders in all stages of AI initiatives systematically (Engagement)

- Ukraine should consider conducting user testing regularly and establishing feedback mechanisms throughout the development and use of AI-driven services.
- Engage civil society, experts and the public in AI policy discussions and design to ensure responsive, transparent and ethical AI services.

Deepen international co-operation in the area of AI in the public sector (Engagement)

- Continue aligning national policies and practices with the EU AI Act, including risk-based classifications, transparency requirements, and data safeguards.
- Participate in joint pilot projects to support Ukraine's ongoing transformation and share its valuable practices with the international community.

Improve AI performance monitoring and evaluation (Impact Monitoring)

- As currently being carried out, the MDT could introduce systematic and structured mechanisms to monitor, evaluate, and improve AI-driven projects at both the organisational level and, over time, at the whole-of-government level.
- Use AI tools to analyse user feedback from surveys and chatbot interactions in real time
- Adopt post-deployment monitoring through live performance dashboards, scaling from individual projects to an integrated, whole-of-government approach to track the effectiveness of AI systems, user uptake, and cost savings.
- Establish ex-ante and ex-post evaluation frameworks that are standardised across agencies, allowing for consistent assessment of AI systems' effectiveness, risks, and benefits at both the organisational and national levels.
- Invest in capacity-building programmes to equip civil servants with the skills and tools needed to monitor, interpret, and act on AI performance data across government, as well as to develop general AI skills for public servants as outlined above.

Recovery and reconstruction priorities

Formalise Ukraine's governance arrangements around AI in the public sector (Enabler)

- Ukraine's centre of government could establish a permanent coordination mechanism, refine roles and responsibilities of CDTOs, and further develop a strategic approach to digital government investments.
- Establish a permanent coordination mechanism, coordinated by the MDT with participation of key stakeholders from the public sector and private sector representatives, at the centre of government dedicated to AI to fortify setting, implementing and monitoring of Ukraine's strategic approach to AI over time, ensuring continuity of ongoing and future initiatives. This approach would also present an opportunity to achieve greater policy coherence, develop common policy tools such as standards and guidelines, and strengthen accountability through systematically monitoring and assessing the impact of AI.
- Refine and strengthen the roles and responsibilities of the CDTOs to enhance implementation capacity and institutionalise accountability across the public sector (short-term).
- Consider developing a strategic approach to digital government investments, including AI initiatives to ensure its resources are invested in line with the national strategies and long-term priorities.

Establish structured and innovation procurement for AI (Guardrail)

- The Public Procurement Agency could establish dedicated AI processes and promote innovation procurement through the upcoming GovTech programme and procurement guidelines.
- Launch small-scale AI pilot projects to refine procurement processes and evaluation criteria.

- Co-develop procurement guidelines with tech companies, academia, and civil society.
- Enhance the capacity of procurement officials through training on AI literacy, accountability, and transparency.
- Promote innovation procurement through the upcoming GovTech programme by supporting trustworthy AI-driven solutions from startups and SMEs to address challenges in service delivery.

Enhance oversight mechanisms (Guardrail)

- The Government of Ukraine could ensure long-term and sustained oversight of AI developments in government by continuing the efforts to establish an independent AI regulatory body, as planned with the future unified digital regulator, along with further developing the MDT monitoring function.
- Continue working on the creation of an independent AI regulatory body via a participatory process involving experts and stakeholders in alignment with the EU AI Act.
- At the executive level, develop the MDT AI monitoring function with tools and ensure consistent mapping of AI solutions, alignment with ethical standards, and risk mitigation strategies

Long-term development priorities

Enhance Ukraine's digital public infrastructure including government data (Enabler)

- Ukraine should continue to invest in key digital infrastructure to establish a set of shared, secure and interoperable digital systems.
- Continue enhancing *Trembita*, focusing on improving data standards, interoperability across the public sector, and work towards achieving real-time access across registries and systems.
- Consider taking a Government as a Platform (GaaP) approach more widely through investing in digital public infrastructure (DPI).

Anchor the WINWIN AI Centre of Excellence as a collaborative innovation hub (Engagement)

- Monitor the Centre's activities and report its progress and performance against defined objectives transparently to the public
- Create a community of practice for the Ukrainian and international public sectors to share use cases and lessons learned.

Strengthen monitoring of AI experimentation (Impact Monitoring)

- The MDT could support responsible AI experimentation by systematically managing experiments to ensure sustained scalability and public trust, both within the WINWIN AI Centre of Excellence and more broadly across the public administration, as exemplified by its ongoing bottom-up idea-collection efforts.
- Define clear entry/exit criteria for AI pilots within the sandbox or a dedicated incubator.
- Evaluate pilot projects using technical, ethical, and service quality indicators with end-user feedback.
- Involve users and experts in the experimentation process.
- Share lessons learned publicly and ensure interdisciplinary oversight from legal, technical, and civil society experts.

Annex 6.A. Ukraine's alignment with international AI standards and ethical guidelines

Ukraine has transitioned from an early endorsement of ethical AI frameworks to active participation in global AI safety coalitions, progressing to the signing of binding legal standards through the Council of Europe. This highlights Ukraine's approach, from embracing global norms to fostering international safety collaboration and implementing enforceable legal commitments, in promoting the responsible use of AI in government and society. In parallel, Ukraine is preparing to align with the European Union's Artificial Intelligence Act, which is expected to be adopted by 2027, further anchoring its regulatory framework within the European and international standards (OECD, 2025[23]).

- **OECD Recommendation on Artificial Intelligence**: Ukraine has adhered to the OECD Recommendation on Artificial Intelligence [OECD/LEGAL/0449], including the OECD AI Principles, first adopted in 2019 and updated in 2024 (OECD, 2024[32]). These foundational OECD legal instruments advocate for trustworthy, human-centric AI that respects human rights, democratic values, environmental considerations, fairness, transparency, and accountability (OECD, 2024[32]).
- **UNESCO's Recommendation on the Ethics of Artificial Intelligence:** In November 2021, UNESCO's Recommendation on the Ethics of Artificial Intelligence was adopted by all 194 Member States, establishing a global framework centred on human rights, fairness, transparency, environmental considerations, and inclusive governance (UNESCO, n.d.[82]).
- **The Bletchley Declaration on AI Safety:** In November 2023, Ukraine continued to foster international collaboration by signing the Bletchley Declaration at the UK-led AI Safety Summit (UK Government, 2025[83]). This initiative, backed by 28 countries including Ukraine, aims to enhance safety around frontier AI through shared risk assessments, scientific co-operation, and transparent oversight (UK Government, 2025[83]).
- **Statement on Inclusive and Sustainable Artificial Intelligence for People and the Planet**: In February 2025, Ukraine joined the Paris AI Action Summit, signing the "Statement on Inclusive and Sustainable Artificial Intelligence for People and the Planet" (Government of France, 2025[84]). Over 50 countries, including Ukraine, endorsed AI core values such as openness, ethical governance, accessibility, labour-market impact, and environmental considerations (Government of France, 2025[84]).
- **Council of Europe's Framework Convention on AI, Human Rights, Democracy, and the Rule of Law:** In May 2025, Ukraine deepened its commitment by supporting the development and signing the Council of Europe (CoE) Framework Convention on AI, Human Rights, Democracy, and the Rule of Law in Strasbourg (Council of Europe, 2024[25]). As the world's first legally binding treaty focused on AI governance, it aims to ensure that activities within the lifecycle of artificial intelligence systems are fully consistent with human rights, democracy and the rule of law, while being conducive to technological progress and innovation (Council of Europe, 2024[25]). To support the implementation of the Convention, Ukraine and the CoE have launched targeted capacity-building initiatives, including a specialised training course for public servants on the intersection of AI and human rights (Council of Europe, 2025[85]).

- Given this complex institutional configuration, it is essential to clarify roles and responsibilities across government to reduce duplication and ensure coherence. The overview below outlines the main bodies currently engaged in strategic planning and recovery governance:

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Notes

[1] A comprehensive review of cybersecurity practices was not carried out. The OECD Directorate for Science, Technology and Innovation (STI) addresses digital security through a dedicated workstream. See https://www.oecd.org/en/topics/policy-issues/digital-security for more information.

OECD Public Governance Reviews

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Ukraine's public governance has demonstrated remarkable resilience in the face of Russia's war of aggression. Despite the extraordinary pressures of war, the country has maintained functioning institutions, continued delivering public services, and sustained an ambitious reform agenda.

This review assesses how Ukraine can strengthen its governance system to support recovery, reconstruction, and long-term development. It examines six interconnected areas: building institutional resilience, improving strategic planning and co-ordination, protecting information integrity, strengthening citizen participation, developing a future-ready civil service, and harnessing artificial intelligence for better public services.

Drawing on OECD standards and international good practices, the review identifies practical steps Ukraine can take, under current wartime conditions and as capacity grows through recovery, to build a more coherent, accountable, and citizen-centered public administration. It is addressed to Ukrainian policymakers, reform practitioners, and international partners supporting Ukraine's governance transformation.

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