



How to Implement the Interim Benchmarks for Chapter 23 “Judiciary and Fundamental Rights” and Chapter 24 “Justice, Freedom and Security”

A Civil Society Perspective



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Interim benchmarks are one of the key tools of the current EU enlargement methodology in the Fundamentals cluster. They were introduced to encourage candidate countries to implement reforms in areas such as the rule of law, anti-corruption, human rights, security, and border management in a meaningful and sustainable way, rather than merely on paper.

That is why the interim benchmarks play a special role in the negotiation process. Further advancement in the negotiations depends on their implementation, since no negotiating chapter can be provisionally closed until compliance with the interim benchmarks in Chapters 23 and 24 is verified. The implementation of these benchmarks should be documented in a dedicated European Commission report known as the Interim Benchmark Assessment Report (IBAR). This assessment will serve as the basis for the EU Member States' political decision on Ukraine's further progress in the accession talks.

Interim Benchmarks apply to Negotiating Chapters 23 'Judiciary and Fundamental Rights' and 24 'Justice, Freedom and Security.' In the context of accession negotiations, these chapters are considered essential to a country's ability to operate as a future member of the EU. They cover an extremely wide range of politically, institutionally, and financially complex reforms.

The requirement to meet interim benchmarks was first introduced in the accession negotiations with Montenegro and Serbia. Montenegro received them in 2013, and Serbia in 2016. However, Montenegro only received its Interim Benchmark Assessment Report in June 2024. So, it took the country more than a decade to reach this stage of the negotiation process.

The duration of the process can be explained by a variety of factors. Some were internal issues: a lack of strong political will for reform, regular turnover in governments and negotiating teams, and instability in institutional implementation. At the same time, the wording of the interim benchmarks was sometimes rather general. As a result, the Montenegrin government required extra time to understand in practical terms what exactly needed to be done and how, for the indicators to be deemed met.

This study seeks to present how Ukrainian civil society views the fulfilment of the European Commission's interim benchmarks, with an emphasis on substantive and lasting reforms rather than purely formal compliance.

For every interim benchmark set by the European Commission and communicated to Ukraine, the study identifies:

- strategic goal to be achieved as a result of the benchmark;
- implementation measures that detail the interim benchmark through specific tasks;
- performance indicators that demonstrate that the relevant measure has been implemented;
- recommended deadlines;
- bodies in charge among the Ukrainian authorities.

The study covers five main areas: judicial reform, anti-corruption, fundamental rights, migration, asylum and border management, and the institutional reform of law enforcement.

In terms of judicial reform, the European Commission has identified four interim benchmarks. They relate to the independence, accountability and integrity of the judiciary, the quality and efficiency of the judiciary, as well as the activities of judicial government and self-governing bodies. Among the central issues addressed in this study is the stable and effective performance of judicial governance bodies — first and foremost the High Council of Justice and the High Qualification Commission of Judges. The capacity of these bodies underpins the selection of judges, the filling of vacancies, disciplinary proceedings, judicial accountability, and the overall performance of the judicial system.

In anti-corruption efforts, the emphasis is placed not only on general policy, but especially on the effectiveness of criminal accountability for corruption-related crimes. We are referring to the independence of NABU and SAPO, the removal of legislative obstacles to the investigation of corruption crimes, improvements to statutes of limitations rules, and the protection of the jurisdiction of anti-corruption bodies.

In terms of fundamental rights, the range of problems is particularly wide. This area covers a wide range of issues and is linked to long-standing structural deficiencies, which have been identified, in particular, in leading judgments of the European Court of Human Rights against Ukraine. This includes failure to comply with court rulings, poor conditions in places of detention, torture and ill-treatment, the absence of a comprehensive personal data protection system, weak anti-discrimination measures, and challenges in the areas of freedom of expression and religion.

With regard to migration, asylum, and border management, the key objective is not just legislative updating, but also bringing strategic frameworks, interagency coordination, and security infrastructure into line with EU standards. Priorities include developing a national Schengen management system and a Schengen Action Plan, updating the migration strategy, aligning with the EU's New Pact on Migration and Asylum, establishing an API/PNR system, and strengthening cooperation among border, migration, and security authorities.

In terms of law enforcement, the institutional dimension of reforms is key. This concerns the reform of the SBI, the National Police, the BES, the ARMA, the penitentiary system, and the probation system, along with building a professional, accountable, and depoliticized system of staff training. The European Commission consistently highlights the fragmentation and uneven progress of reforms in this area, the weakness of accountability mechanisms, staffing issues, and the incomplete transformation of individual institutions. In contrast to some other sectors, progress in this area relies not just on legal reforms but also on transforming institutional functioning, competitive selection processes, auditing, external control, and the allocation of powers.

The implementation of interim benchmarks will depend heavily on the Verkhovna Rada of Ukraine, as legislative changes are needed in all the relevant areas. Depending on the area, legislative measures represent from a quarter to 70% of the actions required to meet the relevant interim benchmarks. In many instances, reforms should be initiated by parliament and subsequently carried out at the institutional level. Without this, real progress will not be possible. For instance, establishing an independent authority for personal data protection should start with the development and adoption of appropriate legislation. Consequently, steady and rapid progress in implementing the interim benchmarks will require sustained and consistent work by the parliament, including a readiness to take politically sensitive or unpopular decisions.

Among the key risks that may affect the pace and quality of reforms needed to achieve the interim benchmarks, the following should be highlighted:

- politically sensitive nature of reforms and the likely resistance to measures affecting the interests of political elites;
- accumulation of long-standing, systemic, and politically complex problems to solve, in particular in the field of human rights and justice;
- the need for improved interagency coordination and cooperation, as some measures — for example, in migration and border management — require the involvement of multiple public authorities;
- staffing challenges, including a shortage of specialists in the relevant fields, difficulties in attracting qualified personnel, and the need to renew the composition of some judicial governing bodies and law enforcement agencies.

The implementation plan for interim benchmarks proposed in this study can serve as a practical starting point for the further assessment of reform progress under Chapters 23 and 24. It can further contribute to the ongoing Ukraine–EU dialogue on improving ways to assess reform progress in a more outcome-based manner.

The proposed list of interim benchmarks was developed in line with the logic of reforms in the field of corruption prevention and anti-corruption efforts, while also ensuring compliance with EU requirements, international standards, and the expectations of Ukraine's key international partners. The selection process sought to identify indicators that simultaneously: (1) align with the priorities of the state anti-corruption policy; (2) cover the key system-forming elements of the anti-corruption infrastructure essential to the state's capacity to prevent, detect, and respond to corruption; (3) are measurable and amenable to objective external evaluation; and (4) reflect the actual requirements for progress in the context of European integration and the fulfilment of international commitments.

The selection of interim benchmarks was based on the logic of the already approved Rule of Law Roadmap, developed by Ukraine in cooperation with international partners. The Roadmap identifies the systemic areas requiring priority reform in order to ensure sustainable progress in the field of the rule of law (including corruption prevention and detection), strengthen institutional independence, and enhance the capacity of anti-corruption institutions. The proposed interim benchmarks constitute a logical continuation and specification of these objectives: they translate strategic priorities into measurable indicators that make it possible to assess real progress.

In particular, the interim benchmarks concerning the Anti-Corruption Strategy and the State Programme, the system of conflict of interest regulation, asset declaration and verification, whistleblower legislation, procedures within the High Anti-Corruption Court, the powers of the Specialized Anti-Corruption Prosecutor's Office, National Anti-Corruption Bureau of Ukraine's access to data and interception powers, electronic criminal justice systems, and criminal policy regarding criminal and administrative offences directly correspond to the priorities of the Roadmap and reflect the most important requirements for ensuring checks and balances in the anti-corruption sphere.

The second key criterion for selecting the interim benchmarks was their compliance with the standards and recommendations established by international monitoring and evaluation mechanisms, in particular:

- GRECO (Group of States against Corruption);
- Organisation for Economic Co-operation and Development (OECD);
- Mechanism for the Review of Implementation of the UN Convention against Corruption (UNCAC IRM);
- Evaluation by the European Commission within the EU enlargement;

Most of these interim benchmarks are already used by these organizations to monitor Ukraine's progress. Accordingly, their inclusion makes it possible to ensure maximum alignment between the domestic assessment framework and international requirements, avoid duplication, and enhance the objectivity of conclusions.

Another criterion used in developing the list of interim benchmarks was based on the understanding that the effectiveness of anti-corruption policy depends on the functioning of the entire enforcement chain, from prevention and detection to investigation, criminal and administrative prosecution, and judicial review. For this reason, the benchmarks are structurally designed to cover:

- The prevention system;
- The detection and investigation system;
- The system of criminal and administrative penalties;
- The judicial system.

Such a structure guarantees that the assessment will be comprehensive and will not be limited to specific elements of the system.

The list of interim benchmarks was also developed with due regard to their coverage of the system-forming elements of the anti-corruption framework, including strategic planning, conflict of interest regulation, asset declaration and verification, the powers of specialized institutions, digital enforcement tools, and the effectiveness of administrative and criminal sanctions.

Thus, the proposed interim benchmarks were selected on the basis of their strategic relevance, compliance with international standards, capacity to reflect the actual weaknesses of the anti-corruption system, and ability to ensure objective monitoring of progress. They constitute a logical continuation of the Rule of Law Roadmap and Ukraine's institutional priorities on the path toward European integration. Their implementation will contribute to the development of a coherent, resilient, and effective system for preventing and combating corruption, aligned with EU legal frameworks and the state's international obligations.

Problem						
1. Legislative alignment and implementation of anti-corruption policies (IBM 23.5)						
Interim benchmark	Strategic objective	Implementation actions	Progress indicators	SHARE (%)	DEADLINE*	BODIES IN CHARGE*
IBM 23.5.1. Advance, sustain and continuously implement the legal and strategic anti-corruption frameworks, including gradual alignment with the EU acquis.	Ensuring continuous and sustained harmonization of national legislation in the field of preventing and combating corruption with the EU acquis.	1. Conducting a regular preliminary assessment of draft laws in order to ensure their compliance with the EU acquis	At least 90% of draft laws in the field of anti-corruption policies undergo a preliminary assessment for compliance with the EU acquis.	10%	On a regular basis	NACP, Ministry of Justice, Verkhovna Rada
		2. Preparation and submission of regular reports on the alignment of national legislation with that of the EU.	Regular (annual or semi-annual) reports on the implementation of the EU acquis are prepared, submitted and published in a timely manner.	10%	Annually, on a regular basis	NACP, Ministry of Justice
IBM 23.5.2. Implementation of relevant GRECO and OECD recommendations.	Ensuring full and timely implementation of international anti-corruption standards and recommendations (GRECO, OECD, UNCAC) in order to improve the effectiveness of the anti-corruption system.	1. Conducting regular preliminary evaluation of draft laws in order to ensure their compliance with GRECO, OECD, and UNCAC standards	At least 90% of draft laws in the field of anti-corruption policies are evaluated for compliance with GRECO, OECD, and UNCAC standards.	10%	On a regular basis	NACP, Ministry of Justice, Verkhovna Rada
		2. Compilation and submission of regular reports on the implementation of international standards (GRECO, OECD, UNCAC) in national legislation.	Reports on the implementation of the recommendations of GRECO, OECD, and UNCAC are compiled and submitted in accordance with the deadlines established via international mechanisms.	10%	Annually, on a regular basis	NACP, Ministry of Justice
IBM 23.5.3. Ensure effective coordination, budgeting, monitoring and evaluation of the anti-corruption strategy and its action plan.	Ensuring effective strategic management of anti-corruption policies through the adoption and implementation of the Anti-Corruption Strategy and the State Anti-Corruption Program, as well as the creation of an effective system of coordination, budgeting, monitoring and evaluation of their implementation.	1. Adoption of the Anti-Corruption Strategy for 2026-2030.	The law approving the Anti-Corruption Strategy for 2026-2030 has come into force.	40%	Q4 of 2026	NACP, CMU, VRU
		2. Development and adoption of the State Anti-Corruption Program for 2026-2030	The State Anti-Corruption Program for 2026-2030 has been approved by the Resolution of the Cabinet of Ministers of Ukraine.	40%	Q2 of 2027	NACP, CMU
		3. The monitoring system for the implementation of the State Anti-Corruption Program for 2026-2030 is in place, in particular its functioning has been ensured by integrating the new SACP into the monitoring information system and making it possible to regularly monitor its implementation.	The State Anti-Corruption Program for 2026-2030 has been fully integrated into the monitoring information system	15%	Q3 of 2026	NACP
IBM 23.6.1 Enhance the independence, mandate effectiveness and operational capacity of the specialised anti-corruption institutions.	Ensuring the effective, independent and institutionally capable functioning of the National Agency for the Prevention of Corruption in accordance with the results of an external independent evaluation.	Organization and conduct of an external independent evaluation of the effectiveness of the National Agency for the Prevention of Corruption	1. The methodology for conducting an external independent evaluation has been approved and published	10%	Q3 of 2026	NACP, CMU
			2. The external independent evaluation report has been published.	20%	Q2 of 2027	NACP, CMU

Problem

2. Corruption prevention (IBM 23.7)

a) Declaration

Interim benchmark	Strategic objective	Implementation actions	Progress indicators	SHARE (%)	DEADLINE*	BODIES IN CHARGE*
IBM 23.7.1. Progress in the development and enforcement of legal and policy frameworks regarding asset declarations.	Ensuring an effective, complete and transparent system of financial control by improving the mechanisms for asset declaration, expanding the range of declarants, and enhancing the tools for verifying declarations.	1. Develop and adopt amendments to legislation in order to (1) expand the range of declarants (in particular, to include advisers and assistants to political officials, as well as heads of state-owned enterprises), as well as to review the list of assets and interests to be declared; (2) minimize risks when declaring cash outside the banking system; (3) improve interagency cooperation and expand access to foreign data in order to verify declarations; (4) implement practical measures to ensure the accuracy of data that identify individuals and objects registered in registers and databases used to control and verify asset declarations.	A law came into force that provides for (1) expanding the range of declarants (in particular, including advisers and assistants to political officials, as well as heads of state-owned enterprises), as well as reviewing the list of assets and interests to be declared; (2) minimizing risks when declaring cash outside the banking system; (3) improving interagency cooperation and expanding access to foreign data in order to verify declarations; (4) implementation of practical measures to ensure the accuracy of data that identify individuals and objects registered in registers and databases used to control and verify asset declarations.	15%	Q2 of 2027	NACP, VRU, CMU
		2. Strengthening the capacity of the National Agency for the Prevention of Corruption to monitor and verify declarations.	1. New procedures for declaration verification have been adopted in order to simplify and increase the effectiveness of such verification.	10%	Q3 of 2027	NACP, Ministry of Justice

b) Whistle-blower protection						
IBM 23.7.2. Progress in the development and enforcement of legal and policy frameworks regarding whistle-blower protection.	Establishment of an effective and comprehensive whistle-blower protection system in line with European standards, including proper legal regulation, secure reporting channels, and access to the necessary support.	1. Bringing national legislation into line with European standards for the protection of persons reporting on breaches of European Union law.	The law that brings national legislation on whistle-blower protection into line with European standards has entered into force; it, inter alia, contains provisions on: <ol style="list-style-type: none"> 1. the creation of safe and confidential internal and external channels for reporting breaches; 2. protection from dismissal, discrimination or other forms of retaliation; 3. specifying the circle of persons entitled to protection (including former employees, candidates for positions, contractors, and intermediaries); 4. expansion of rights and protections to whistle-blowers who report a wide range of offenses, not limited to corruption. 	15%	Q2 of 2027	NACP, VRU, CMU
		2. Improving the technical functionality of the Whistleblower Reporting Portal, in particular in order to improve the protection of personal data and the confidentiality and/or anonymity of whistleblowers.	The updated functionality of the Unified Whistleblower Reporting Portal is in place, providing an enhanced level of personal data protection and confidentiality/anonymity due to compliance with the established information security and data protection requirements.	10%	Q4 of 2026	
		3. Introduction of a system of psychological assistance for whistleblowers.	By-laws have been adopted and put into effect that determine the mechanism for providing psychological assistance for whistleblowers, and the relevant system functions and ensures whistleblowers' access to such assistance.	15%	Q2 of 2027	NACP, CMU, Ministry of Justice
c) Conflict of interest						
IBM 23.7.3. Progress in the development and enforcement of legal and policy frameworks regarding conflict of interest.	Ensuring an effective system for preventing and resolving conflicts of interest by improving legislation and strengthening the institutional capacity of the National Agency for the Prevention of Corruption to monitor and control compliance.	1. Legislative amendments have been adopted and implemented to strengthen the institution of conflict of interest, including by improving the definition of conflict of interest, introducing the concept of "apparent" conflict of interest, improving the mechanisms for its settlement, gift policy, post-employment restrictions, and rules for the transfer of corporate rights.	A law came into force that settles the matter of defining conflict of interest, including an apparent conflict of interest, as well as improved mechanisms for its settlement, gift policy, post-employment restrictions, and rules for the transfer of corporate rights.	15%	Q3 of 2027	NACP, VRU, CMU
		2. The institutional capacity of the National Agency for the Prevention of Corruption to monitor and control compliance with the legislation on conflict of interest has been strengthened by updating internal procedures and legislative regulation of relevant processes.	An updated procedure for monitoring and controlling compliance with the requirements of the legislation on preventing and resolving conflicts of interest has been approved, ensuring legal certainty, transparency, and efficiency of the relevant procedures.	10%	Q4 of 2027	VRU
		2. Prepare and adopt by-laws and methodological guidelines necessary for the effective enforcement of the updated rules on conflict of interest.	1. By-laws necessary for the enforcement of the updated regulations on conflict of interest have been adopted/approved.	15%	Q4 of 2027	CMU, NACP

d) Lobbying						
IBM 23.7.4. Progress in the development and enforcement of the legal and policy framework regarding lobbying.	Ensuring transparent, accountable and effective regulation of lobbying by improving legislation and strengthening the institutional capacity of the National Agency for the Prevention of Corruption in the field of monitoring, control, and development of a culture of integrity in lobbying.	The legislation in the field of lobbying and internal procedures of the National Agency for the Prevention of Corruption on monitoring and control over compliance with the requirements of the legislation on lobbying have been improved.	1. The report of the National Agency for the Prevention of Corruption on the results of monitoring of legislation in the field of lobbying including gaps and proposals for its improvement has been published.	10%	Q1 of 2027	NACP
			2. Updated internal procedures of the National Agency for the Prevention of Corruption for monitoring and controlling compliance with lobbying legislation have been approved.	15%	Q1 of 2027	NACP, Ministry of Justice
		Conducting a comprehensive outreach campaign by the National Agency on Corruption Prevention in order to increase the awareness and competence of stakeholders in the field of transparent and ethical lobbying.	1. The official guidelines of the National Agency on Corruption Prevention on the application of legislation in the field of lobbying have been published.	15%	Q3 of 2027	NACP
			2. A plan (or strategy) for raising awareness of transparent and ethical lobbying has been developed and approved, identifying target groups, communication tools, and competence-building activities.	10%	Q4 of 2026	NACP
e) Financing of political parties and electoral campaigns						
IBM 23.7.5. Progress in the development and enforcement of legal and policy frameworks regarding financing of political parties/electoral campaigns.	Ensuring transparent, accountable and effective regulation of the financing of political parties and electoral campaigns by improving legislation, strengthening control mechanisms, and reducing the risks of undue influence on political processes.	Adoption of amendments to legislation with regard to: (1) identifying a single independent oversight authority for the control (analysis) of financial reports on the receipt and use of electoral funds in all types of elections, ensuring it has proper powers and institutional capacity; (2) the introduction of a risk-based approach to the analysis of candidates' financial reports; (3) the expansion of the functionality of the POLITDATA register for the submission, automated verification, and publication of reports; and (4) ensuring open access of voters to information on the financing of electoral campaigns through the public part of the POLITDATA register.	A law came into force regulating: (1) the identification of a single independent oversight authority for the control (analysis) of financial reports on the receipt and use of electoral funds; (2) the introduction of a risk-oriented approach to their analysis; (3) the expansion of the functionality of the POLITDATA register; and (4) ensuring open access to information on the financing of electoral campaigns.	15%	Q4 of 2026	NACP, CEC, VRU, CMU
		Adoption of amendments to legislation with regard to: (1) establishing bans on the use of public funding by political parties; (2) reducing the risks of hidden financing of political parties and electoral campaigns; and (3) introducing mechanisms for constant monitoring of financial and economic activities of political parties, including the use of information from the public, involvement of monitoring groups, and the use of analytical tools to identify risks.	A law came into force regulating: (1) restrictions on the use of public funding by political parties; (2) measures to prevent hidden financing; and (3) mechanisms for monitoring the financial and economic activities of political parties.	15%	Q4 of 2026	NACP, VRU, CMU
		Adoption of amendments to legislation with regard to: (1) the definition of clear-cut legal elements of offenses in the field of financing political parties and electoral campaigns, drawing a line between administrative and criminal liability and providing the definition of the liable party; and (2) the introduction of proportional (balanced) and effective sanctions for relevant offenses.	A law came into force laying down: (1) clear-cut legal elements of offenses in the field of financing political parties and electoral campaigns; (2) proportional and effective sanctions for their commission.	15%	Q4 of 2026	NACP, VRU, CMU

Problem						
3. Track record against corruption (IBM 23.8)						
a) General aspects						
Interim benchmark	Strategic objective	Implementation actions	Progress indicators	SHARE (%)	DEADLINE*	BODIES IN CHARGE*
1. Adoption and implementation of legislative amendments to ensure the consideration of civil and administrative cases within the jurisdiction of the High Anti-Corruption Court by a single judge in order to increase procedural efficiency and bring judicial practice in line with constitutional and procedural standards.	The procedural efficiency of the High Anti-Corruption Court has been enhanced by creating a legal basis for single-judge trials of cases within the jurisdiction of the HACC.	1. Adoption and implementation of amendments to legislation aimed at ensuring single-judge trials of civil and administrative cases by the High Anti-Corruption Court	A law has entered into force providing for amendments aimed at ensuring single-judge trials of civil and administrative cases by the High Anti-Corruption Court	15%	Q1 of 2027	HACC, Ministry of Justice, VRU
IBM 23.6.1 Enhance the independence, mandate effectiveness and operational capacity of the specialised anti-corruption institutions (both to prevent and combat corruption), in particular by extending the NABU's jurisdiction to cover all high-risk public positions and granting SAPO the necessary powers to start criminal proceedings against Members of the Verkhovna Rada without prior approval of the Prosecutor General.	1. The Specialized Anti-Corruption Prosecutor's Office has a sufficient level of institutional and procedural independence, which allows it to effectively supervise the pre-trial investigation. (IBM 23.6.1; 23.6.3)	Granting the Head of the SAPO the authority to independently submit extradition requests.	A law came into force providing for the authority of the Head of the SAPO to independently submit extradition requests.	15%	Q4 of 2026	NABU, SAPO, VRU
		Granting the Head of the SAPO the authority to independently submit petitions for the creation of joint investigative groups in corruption cases at the highest level.	A law came into force providing for the authority of the Head of the SAPO to independently submit petitions for the creation of joint investigative groups in corruption cases at the highest level.	15%	Q4 of 2026	NABU, SAPO, VRU
		Granting the Head of the SAPO the authority to independently open criminal proceedings in cases of criminal corruption offenses committed by MPs.	A law has entered into force providing for the powers of the Head of the SAPO to independently open criminal proceedings in cases of criminal corruption offenses committed by MPs.	15%	Q4 of 2026	NABU, SAPO, VRU
		Organization and conduct of an external independent evaluation of the SAPO performance (audit).	The report on the external independent evaluation of the SAPO performance (audit) has been published.	10%	Q2 of 2027	SAPO, Prosecutor General's Office
		Providing the SAPO with sufficient human and financial resources.	A law came into force changing the approach to determining the official salaries of (1) civil servants employed by the SAPO; (2) other employees of the SAPO; (3) workers engaged in servicing the SAPO.	10%	On a regular basis starting from 2027	SAPO, Prosecutor General's Office

	2. The National Anti-Corruption Bureau is independent, effective and has sufficient resources; high-level corruption cases are investigated effectively and impartially (IBM 23.6.1, 23.6.2)	The NABU has effective access to impartial, timely and high-quality forensic expert services	A regulatory act has entered into force, which: 1) establishes an Expert Institution to conduct forensic examinations in criminal proceedings of the NABU and the SAPO; 2) introduces the procedure for electing the Head of the Expert Institution; 3) sets guarantees of the independence of the Expert Institution; 4) outlines performance features of the Expert Institution.	20%	Q4 of 2026	NABU, SAPO, Ministry of Justice, CMU
		Providing the NABU with autonomous access to information based on the results of information collection from electronic communication networks in the interests of the National Anti-Corruption Bureau and preventing any other bodies from accessing the materials and identifiers based on which it is carried out, by introducing an interception system for electronic communications (ISEC) of the National Anti-Corruption Bureau (with its own means of managing ISEC) and connecting it to modernized network gateways installed in the networks of mobile operators	A law has entered into force by which the NABU is provided with autonomous access to information intercepted from electronic communication networks and preventing any other bodies from accessing the materials and identifiers based on which it is carried out, by introducing an interception system for electronic communications (ISEC) of the National Anti-Corruption Bureau (with its own means of managing the ISEC) and connecting it to the modernized network gateways installed in the networks of mobile operators.	20%	Q4 of 2026	NABU, SSU, VRU
		Granting the NABU access to state secrets for NABU undercover officers subject to security vetting by the Security Service of Ukraine.	A law came into force granting the Director of the NABU powers to give admission and access to state secrets to undercover officers of the operational units of the NABU subject to their vetting by the SSU.	15%	Q4 of 2026	NABU, SSU
		The legislation has expanded and clarified the range of persons in respect of whom the NABU may conduct a pre-trial investigation of corruption-related criminal offenses.	A law came into force expanding the range of persons in respect of whom the NABU may conduct a pre-trial investigation of corruption-related criminal offenses, namely: the head of the permanent auxiliary body established by the President of Ukraine, their first deputy and deputy; the head of Oblast, Kyiv City and Sevastopol City state administrations, their first deputy and deputy; heads of military-civil administration of oblasts, the city of Kyiv, their first deputy and deputy; the head of the oblast military administration, the Kyiv city military administration, their first deputy and deputy; the Director of the State Bureau of Investigation, their first deputy and deputy; members of the supervisory board, and members of the executive bodies of large business entities with a share of state or municipal property in its authorized capital exceeding 50 percent.	20%	Q4 of 2026	NABU, SAPO, Ministry of Justice, VRU

		Providing the NABU with sufficient human and financial resources.	A law came into force changing the approach to determining the official salaries of NABU employees, including that of the head of the independent sector, senior operational employee; the head of a sector within a structural unit; chief specialist; and operations officer.	10%	On a regular basis starting from 2027	NABU, VRU, Ministry of Justice
b) Grounds and procedural aspects of prosecution for corruption and corruption-related offenses						
Practical achievements in combatting corruption	The criminal procedural legislation has been improved in order to: (1) ensure proper terms of pre-trial investigation and time limits for prosecution for committed corruption offenses; (2) eliminate opportunities for abuse of procedural rights by participants in court proceedings; and (3) establish clarity of the legal grounds and procedure for monitoring bank accounts by the NABU. (IBM 23.8.3)	Adoption of amendments to the criminal procedural legislation (1) increasing the time limits and improving the grounds for suspension and expiration of such periods; (2) revision of the pre-trial investigation time limits.	A law came into force providing for: (1) an increase in the time limits for criminal prosecution for corruption offenses; improvement of the grounds for suspension and expiration of such time limits; (2) repeal of the provisions of the Criminal Procedure Code of Ukraine regarding the closure of criminal proceedings due to expiration of pre-trial investigation time limits.	20%	Q2 of 2027	NABU, SAPO, VRU, Ministry of Justice
		Adoption of amendments to the criminal procedural legislation regarding the legal grounds and the procedure for the NABU's access to monitoring bank accounts.	A law came into force establishing: (1) the general procedure for access to monitoring bank accounts in criminal proceedings; (2) the procedure for granting permission to monitor bank accounts in criminal proceedings; and (3) the procedure for acting on the said permission.	15%	Q2 of 2027	NABU, SAPO, VRU, Ministry of Justice
IBM 23.7.6 Ensure effective, proportionate and sufficiently dissuasive sanctions in case of violations of the obligations under the corruption prevention framework	Ensuring effective, proportionate and sufficiently dissuasive administrative liability for corruption-related offences, including appropriate procedures for their detection and consideration.	Adoption of amendments to the legislation in order to (1) ensure effective, proportionate and sufficiently dissuasive administrative sanctions for corruption-related violations; (2) establish sufficient deadlines for imposing administrative penalties; (3) improve the procedure for identifying, documenting and collecting evidence; (4) simplify the procedure for considering relevant cases; and (5) ensure equality of arms and adversarial proceedings (including by granting the right of appeal to parties representing the interests of the state).	A law has entered into force aimed to (1) ensure effective, proportionate and sufficiently dissuasive administrative sanctions for corruption-related violations; (2) establish sufficient deadlines for imposing administrative penalties; (3) improve the procedure for identifying, documenting and collecting evidence; (4) simplify the procedure for considering relevant cases; and (5) ensure equality of arms and adversarial proceedings (including by granting the right of appeal to parties representing the interests of the state).	15%	Q4 of 2026	NACP, VRU, Ministry of Justice

c) Track record

<p>IBM 23.8.1 Make tangible progress towards demonstrating a solid track record of investigations, prosecutions and convictions in corruption cases, in particular final convictions in high level corruption cases</p>	<p>Building a sustainable and effective track-record of investigation, prosecution and adoption of final court decisions in corruption cases, in particular regarding high-level corruption.</p>	<p>The effectiveness of investigation, prosecution and trial of corruption cases, in particular high-level corruption, has improved.</p>	<p>An increase of at least 15% in the share of criminal proceedings in corruption cases ending in procedural decisions based on the results of the trial (including convictions), compared to the base year.</p>	<p>15%</p>	<p>Q4 of 2027</p>	<p>NABU, SAP, HACC, Office of the Prosecutor General, BES, SBI</p>
<p>IBM 23.8.2 Increase the number and overall value of seized frozen and confiscated assets in corruption cases</p>	<p>Ensuring the effective detection, seizure, confiscation and management of assets in corruption cases, which ensures real compensation for damage and improves the dissuasive effect of the anti-corruption system.</p>	<p>An aligned interdepartmental system for collecting, recording and analyzing data on the detection, seizure and confiscation of assets in corruption cases, including an indicator of the effectiveness of confiscation (the ratio of the value of discovered and actually confiscated assets), has been introduced, ensuring the consistency of data between the NABU, the PGO, the HACC, the SJA, and the NACP.</p>	<p>An aligned interdepartmental data collection and analysis system has been introduced and put into operation, which makes it possible to regularly calculate the confiscation efficiency indicator (the ratio of the value of detected and actually confiscated assets) in corruption cases.</p>	<p>10%</p>	<p>Q4 of 2027</p>	<p>NACP, SJA, Prosecutor General's Office</p>

Problem						
4. Mainstreaming of anti-corruption in relevant sectors (IBM 23.9)						
Interim benchmark	Strategic objective	Implementation actions	Progress indicators	SHARE (%)	DEADLINE*	BODIES IN CHARGE*
IBM 23.9.1 Conduct risk assessments in sectors most vulnerable to corruption	Ensuring systematic identification and analysis of corruption risks in the most vulnerable sectors as a basis for developing effective sectoral anti-corruption measures.	Conducting an assessment of corruption risks in priority sectors by the National Agency for Corruption Prevention and developing guidelines based on it to minimize such risks involving stakeholders.	Guidelines on minimizing corruption risks in vulnerable sectors, developed on the basis of the analysis of corruption risks conducted by the National Agency for Corruption Prevention, have been published.	10%	On a regular basis	NACP
IBM 23.9.2 Apply systemic integrity measures in sectors most vulnerable to corruption	Ensuring effective application of sectoral anti-corruption measures in the most vulnerable sectors by strengthening institutional capacity, coordination, and accountability of public authorities.	1. Sectoral anti-corruption measures have been developed and implemented in priority sectors based on risk assessment in accordance with the guidelines of the National Agency on Corruption Prevention involving stakeholders.	Sectoral anti-corruption measures are implemented by the National Agency for the Prevention of Corruption in the specified areas.	10%	On a regular basis	NACP
		2. Strengthening the capacity of the National Agency for Corruption Prevention to provide guidelines, coordinate the integration of anti-corruption approaches, and monitor the application of sectoral measures.	The National Agency for the Prevention of Corruption is provided with the necessary human and financial resources to monitor sectoral activities, which is confirmed by the results of an independent evaluation.	10%	On a regular basis	NACP
		3. Ensuring the independent institutional capacity of public authorities and local self-government bodies, including strengthening the role of authorized corruption prevention units (persons), for the effective implementation of sectoral anti-corruption measures.	The results of the assessment of the capacity of public authorities and local self-government bodies to implement sectoral anti-corruption measures have been published, confirming the availability of the necessary resources and institutional capacity.	10%	On a regular basis	NACP
		4. Measures have been introduced to improve integrity in key sectors, in particular by reducing the use of non-competitive procurement procedures and ensuring transparency and public involvement in reconstruction processes.	Official reports on the state of public procurement and reconstruction processes have been published, confirming a decrease in the share of non-competitive procurement procedures and ensuring transparency and public involvement.	10%	On a regular basis	Ministry of Economy, Recovery Agency

An independent, professional, and honest judicial system is the cornerstone of Ukraine's European integration path. Given the nature and complexity of this area, it is impossible to achieve rapid results through simple solutions, and therefore a coordinated state policy that involves phased implementation of measures to overcome systemic problems plays a decisive role.

In the 2025 Enlargement Report, just like in previous reports, the European Commission continued to highlight the shortcomings of the Ukrainian judicial system in terms of ensuring the independence and accountability of judges, as well as the quality and efficiency of the judicial system. The Rule of Law Roadmap specifies a number of measures to be implemented by 2028 to address these challenges. However, it is important to develop a more detailed plan of action to overcome them, with indicators to demonstrate that the problem has been solved.

This study is an attempt to conceptualize and formulate such strategic objectives that could serve as an indicator that the judicial reform in Ukraine is moving in the "right direction" at a satisfactory pace and solves the systemic problems that the European Commission highlighted.

The system of strategic objectives was created to address the problems that the authors see as critical for ensuring the stable operation of the judicial system on the basis of the rule of law. The focus was on matters related to the independence, accountability, and efficiency of the judiciary. Taking into account this approach, 6 problems and 11 strategic objectives (which correlates to the 4 European Commission' interim benchmarks) indicating that the problems are solved have been identified, namely:

1. staff shortage and long-term underfunding of the judicial system, which might be solved by achieving 2 strategic objectives, i.e. provision of the judicial system with sufficient financial and human resources and ensuring effective control over the mechanism for the allocation of these resources;
2. the management system of the judicial branch is institutionally complex, allows for functional overlaps and is not fully protected from outside interference, which might be solved by achieving 2 strategic objectives, i.e. ensuring the stable operation of judicial governance and self-governance bodies on the basis of the principles of independence, integrity, and professionalism, given efficient use of resources;

3. judges are not protected from undue interference in their work, which might be solved by achieving 1 strategic objective, i.e. ensuring the effectiveness in the practical implementation of the existing guarantees of judicial independence;
4. possibility for judges to avoid liability for violations committed, which might be solved by achieving 2 strategic objectives, i.e. the introduction of effective prevention systems, timely detection of violations committed by judges, and ensuring the inevitability of punishment for them;
5. personnel-related procedures contain shortcomings and gaps, which might be solved by achieving 1 strategic objective, i.e. ensuring the efficiency, transparency and predictability of these procedures;
6. a decrease in the efficiency of the judicial system and the lack of systematic steps to address this issue, which might be solved by achieving 3 strategic objectives, i.e. the introduction of a system that could provide objective and up-to-date data on the quantitative and qualitative indicators of the work of courts and amendments to the legislation aimed at improving court consideration procedures.

The proposed objectives are to be achieved through the implementation of a number of measures, some of which are specified in the Rule of Law Roadmap. In order to ensure the possibility of monitoring the progress of the implementation and, as a result, the achievement of strategic objectives, a measurable implementation indicator is proposed for each of the measures, showing the “weight” of a particular indicator in the context of achieving the strategic objective.

Interim benchmark	Interim benchmark measures	Strategic objective	Implementation actions	Progress indicators	Share (%)	Deadline	Bodies in charge	Comment
IBM 23.1 – Legislative Framework and Self-Governing Bodies Reinforced independence, integrity, status and institutional capacities of the judicial ... governance and self-governance bodies, including regarding the filling of vacancies, making tangible progress on the optimisation of judicial management, court management ... to enhance their efficiency.	IBM 23.1.1 Tangible progress on the optimisation of the judicial management and of the work of courts.	Members of judicial governance and self-governance bodies (HCJ, HCCJ, CJU) fully meet the criteria of independence, integrity, and professionalism and exercise their powers effectively and in the interests of justice.	Extension of the mandate of international experts in the HCCJ Selection Commission (+ IBM 23.2)	the Law on Amendments to the Law of Ukraine 'On the Judiciary and the Status of Judges' has entered into force, thereby extending until 2028 the period of involvement of independent experts delegated by international and foreign countries' organizations, which, in accordance with international and interstate agreements, have been providing Ukraine with international technical assistance in the field of judicial reform and/or prevention of and combating corruption over the past five years, in the HCCJ Selection Commission	20%	Q2 of 2026	VRU Ministry of Justice HCJ	Priority recommendation of the EC (except for the indication of the duration of the extension) (Enlargement Report 2025)
			Analysing ways to improve the procedure for the selection and appointment (election) of members of the HCJ and the HCCJ.	a report on analysis results has been published	5%	Q2 of 2026	Ministry of Justice HCJ HCCJ	Activity 1.1.C.1.1. The RM envisages: "Improving the transparency and quality of the selection processes, including for the HCJ and HCCJ... with a special focus on the capacity of judicial self-governance bodies based on independent analysis, taking into account the future organization of the justice system." The deadline is Q2 of 2026. The body-in-charge is the Ministry of Justice.
			Improvement of the procedure for the formation and revision of the scope of powers of the CJU.	the law has entered into force, whereby: a) a competitive procedure for the election of members of the CJU has been introduced (4%); b) the scope of powers of the CJU has been revised (3%); c) the procedure for early termination of the powers of CJU members in the event of violations that negatively affect public confidence in justice and the judiciary has been determined (3%)	10%	Q2 of 2026	VRU Ministry of Justice HCJ	Activity 1.1.C.1.1. The RM envisages: "Improving the transparency and quality of the selection processes, including for the CJU... with a special focus on the capacity of judicial self-governance bodies based on independent analysis, taking into account the future organization of the justice system." The deadline is Q2 of 2026. The body-in-charge is the Ministry of Justice.

			Improving the procedure for convening the Congress of Judges of Ukraine.	a law entered into force, whereby: a) it is possible to convene the Congress of Judges of Ukraine online (2%); b) all members of the judicial community might be involved in resolving certain matters assigned to the Congress of Judges of Ukraine (in particular, regarding the election of HCJ members and judges of the CCU) (3%)	5%	Q2 of 2026	VRU Ministry of Justice HCJ CJU	Activity 1.1.C.1.4. The RM envisages: "Development and adoption of a law aiming to introduce the possibility of convening the Congress of Judges of Ukraine online as an exception in situations when holding an offline meeting is impossible." The deadline is Q4 of 2025. Bodies-in-charge are the Ministry of Justice, the Verkhovna Rada, the Cabinet of Ministers of Ukraine, the Ministry of Finance, and the Ministry of Digital Transformation of Ukraine.
			Formation of a new composition of the Selection Commission for the HQCJ, taking into account the extension of the mandate of international experts (+ IBM 23.2).	an announcement was posted on the official website of the HCJ informing about the formation of a new composition of the Selection Commission for the HQCJ	10%	Q3 of 2026	HCJ CJU	
			Improving the procedure for the formation of the HCJ and the HQCJ in order to ensure the seamless operation of these bodies and the election (appointment) of persons who fully meet the criteria of independence, integrity, and professionalism.	the Law on Amendments to the Law of Ukraine 'On the Judiciary and the Status of Judges' has entered into force, which in particular: a) lays down the circumstances under which a person cannot be appointed as a member of the Selection Committee for the HQCJ (6%); b) specifies the procedure for compiling and providing public access to the profiles of candidates for the positions of HQCJ members (6%); c) sets the terms for all stages of the procedure for the selection of HQCJ members and provision of mechanisms for responding to violations of these terms (8%);	20%	Q3 of 2026	VRU Ministry of Justice HCJ	

				<p>the Law on Amendments to the Law of Ukraine "On the High Council of Justice" has entered into force, which in particular:</p> <p>a) specifies the circumstances under which a person cannot be appointed as a member of the Ethics Council (2%);</p> <p>b) introduces the procedure for compiling and ensuring public access to the profiles of candidates for the positions of HCJ members (2%);</p> <p>c) sets the terms of all stages of the procedure for the selection of HQCJ members and provides mechanisms for responding to violations of these terms (6%);</p> <p>d) introduces a mechanism for direct election of HCJ members by professional communities (6%);</p> <p>e) provides for an automatic extension of the powers of an HCJ member until the election (appointment) of a new person instead, but not longer than three months from the date of expiration of the term for which this member of the Council was elected (appointed) (4%)</p>	20%	Q3 of 2026	VRU Ministry of Justice	
			Streamlining of the procedure for dismissal of HCJ and HQCJ members in case of gross or systematic neglect of their duties or allowing behavior that undermines the authority and public confidence in justice and the judiciary.	the law came into force, it lays down the procedure for dismissing HCJ and HQCJ members in case of gross or systematic neglect of their duties or allowing behavior that undermines the authority and public confidence in justice and the judiciary, in particular, it determines the procedure and terms for considering reports of such behavior submitted by individuals or legal entities, the procedure for their investigation, and the legal consequences of the relevant investigation.	10%	Q2 of 2027	VRU	
		Judicial governance and self-governance bodies continuously and effectively exercise their powers and are provided with the necessary resources.	Establishment and ensuring of the effective functioning of analytical units within the structure of the secretariats of the HCJ and the HQCJ for the collection, processing, and analysis of information on judges and candidates for the positions of judges participating in personnel-related procedures.	specialized analytical units began to operate within the HCJ and the HQCJ	10%	Q1 of 2026	HCJ HQCJ CMU Ministry of Finance	Activity 1.2B.1.2. The RM envisages: "Strengthening the institutional capacity of the HQCJ and its Secretariat, in particular through the creation of a separate analytical unit consisting of properly selected staff, the digitalization of judges' profiles, and the strengthening of IT and human resources." The deadline is the Q1 of 2026. Bodies-in-charge - HQCJ, CMU, and Ministry of Finance.

			Conducting a functional audit of the SJA and developing recommendations aimed at: eliminating overlaps of powers and delimitation of powers between the SJA and the HCJ; optimizing the structure of the SJA and its territorial departments.	a report on the results of the functional audit has been published	5%	Q2 of 2026	HCJ SJA CMU Ministry of Finance	Activity 1.1.C.1.5 RM
			Prompt filling of vacant positions in the HCJ according to the updated procedure.	vacancies in the HCJ are filled within three months after they occur	20%	from the third quarter of 2026, and thereafter on a continuous basis	Ethics Council entities that appoint (elect) HCJ members	
			Improvement of the status and activities of the SJA based on the functional audit.	entry into force of the law	15%	Q4 of 2026	Ministry of Justice VRU HCJ SJA	Activity 1.1.C.1.6 RM
			Conducting an audit of the activities of judicial governance and self-governance bodies and developing recommendations aimed at: eliminating overlaps of powers of these bodies and/ or their blending; delimitation of their competence; and improving the status and procedures of these bodies.	audit report has been published	5%	Q1 of 2027	HCJ HQCJ CJU	Activity 1.1.C.1.2. RM.
			Development of a plan for the implementation of recommendations based on the results of the audit of the activities of judicial governance and self-governance bodies.	a plan for implementing the recommendations has been published	5%	Q2 of 2027	HCJ HQCJ CJU	
			Conducting a competition for the selection of new members of the HQCJ according to the improved procedure.	a duly authorized composition of the HQCJ has been formed	20%	Q2 of 2027	Selection Commission for the Members of the HQCJ HCJ	

			Improvement of the status of judicial governance and self-governance bodies, delimitation of their competence and, if necessary, reorganization following the audit results.	entry into force of a law that takes into account the recommendations provided in the audit report	20%	Q4 of 2027	Ministry of Justice VRU HCJ HQCJ CJU Ministry of Finance	Activity 1.1.C.1.3. RM.
	Funding of the judicial system is sufficient, fair, transparent, and subject to proper control over the effectiveness of budget expenditures.		Conducting a functional audit of the SJA and developing recommendations aimed at improving the procedures for allocating SJA funds.	a report on the results of the functional audit has been published	15%	Q2 of 2026	HCJ SJA CMU Ministry of Finance	Activity 1.1.C.1.5 RM
			Approval of the program for the implementation of the recommendations provided based on the results of the functional audit of the SJA.	SJA order on the approval of the program for implementing the recommendations	15%	Q2 of 2026	SJA HCJ	
			Drafting rules of procedure for transparent planning and allocation of budgetary resources in the judicial system based on objective and clear-cut criteria.	decision of the HCJ on approval of the rules of procedure for planning and allocation of budgetary resources in the judicial system	30%	Q3 of 2026	HCJ	Fulfilled: HCJ Decision No. 2813/0/15-25 dated 27.12.2025: https://hcj.gov.ua/doc/doc/56610
			Providing HCJ with effective tools to influence the decision-making concerning the amount of allocations to the judicial system from the State Budget.	the Law on Amendments to the Budget Code of Ukraine aimed at ensuring the effective involvement of the HCJ in the budget process when determining the amount of allocations for the judicial system came into force	20%	Q3 of 2026	VRU HCJ	
			Conducting an analysis of the funding of the judicial system and developing recommendations on ways to improve it.	a report on the results of the study has been published	20%	Q2 of 2028	HCJ SJA CJU Ministry of Finance Accounting Chamber of Ukraine	

<p>IBM 23.2 – Independence, Accountability and Integrity Further enhanced structural independence, integrity and accountability sustained at all levels of the judiciary, notably through improving merit-based selection processes; revising the integrity vetting procedures for the Supreme Court and other high court judges and the selection procedures for the Supreme Court and extending the selection commission for the members of the High Qualification Commission of Judges of Ukraine (HQCJ) without delay, with the meaningful involvement of independent experts nominated by international partners; ... advancing the vetting of sitting judges with the Public Integrity Council's involvement ...; addressing the backlog in disciplinary cases and improving the disciplinary and corruption prevention tools and their enforcement, including integrity declarations, significantly advancing the implementation of a transparent random case allocation."</p>	<p>IBM 23.2.1 Improved merit-based selection processes.</p>	<p>Personnel procedures in the judicial system are fair and competitive, ensuring prompt filling of new vacancies with independent, honest, and professional judges.</p>	<p>Conducting an analysis of the procedure and practice for managing the matter of the secondment of judges by the HQCJ and HCJ for 2022-2025 and developing recommendations for their improvement.</p>	<p>a report on analysis results has been published</p>	<p>10%</p>	<p>Q1 of 2026</p>	<p>HCJ HQCJ SJA</p>	
			<p>Extension of the term of office of the Public Council of International Experts.</p>	<p>entry into force of the Law on Amendments to the Law of Ukraine "On the High Anti-Corruption Court" with regard to the extension of the term of office of the Public Council of International Experts</p>	<p>15%</p>	<p>Q1 of 2026</p>	<p>VRU Ministry of Justice HCJ</p>	
			<p>Strengthening the role and institutional capacity of the PIC.</p>	<p>entry into force of the Law on Amendments to the Law of Ukraine ""On the Judiciary and the Status of Judges""; which envisages: a) creation of the Secretariat of the Council, with the possibility of financing its operation from the state budget or international technical assistance funds (4%); b) involvement of the PIC in the procedures for selecting new judges to local courts (4%); c) increasing the significance of the Council's conclusion on the failure of a judge (candidate for the position of a judge) to meet the criteria of integrity and professional ethics in the procedures for the selection and qualification assessment of judges (4%); d) the power of the PIC to initiate disciplinary proceedings against a judge in respect of whom a conclusion on non-compliance with the criteria of integrity and professional ethics has been approved (4%); e) a procedure for providing access for employees of the Secretariat of the Council (assistants to PIC members and analysts) to the materials of judges' profiles (profiles of candidates for the position of a judge), in particular, the personal data contained therein (4%).</p>	<p>20%</p>	<p>Q2 of 2026</p>	<p>VRU Ministry of Justice HCJ HQCJ PIC</p>	<p>Activity 1.2B.1.3. The RM envisages: "Strengthening the capacity and effectiveness of the PIC, in particular through improving access to judges' profiles, organizational improvement of the analytical capacity of the PIC, and the formation of a secretariat." The deadline is Q4 of 2025. Bodies-in-charge - HQCJ and PIC.</p>
			<p>Optimization of the procedure for secondment of judges.</p>	<p>amending the Procedure for Secondment of a Judge to Another Court of the Same Level and Specialization (as a temporary transfer), approved by Decision No. 54/0/15-17 of the HCJ dated 24.01.2017, to provide for a reduction in the number of bodies involved in this process.</p>	<p>15%</p>	<p>Q2 of 2026</p>	<p>HCJ HQCJ SJA</p>	<p>Activity 1.2B.1.8. The RM envisages: "Optimization of the procedure for secondment of a judge by reducing the number of bodies involved in this process." The deadline is Q2 of 2026. Bodies-in-charge - HCJ and HQCJ.</p>

			Improving the procedure for conducting the competition to fill vacant positions of judges of the Supreme Court.	entry into force of the law on amendments to the Law of Ukraine "On the Judiciary and the Status of Judges" regarding the special aspects of the competition to fill vacant positions of judges of the Supreme Court, in particular, by involving international experts in the selection of judges via the Public Council of International Experts	25%	Q4 of 2026	VRU Ministry of Justice HCJ	Activity 1.2B.1.6. The RM envisages: "Improving the procedure of the competition to fill the positions of judges of the Supreme Court by providing for a temporary but significant involvement of independent experts." The deadline is Q4 of 2026. Bodies-in-charge – Ministry of Justice, HCJ, HQCJ, and VRU.
			Improving the procedure for transfer of judges without competition.	approval of the procedure for the transfer of judges in the event of reorganization, liquidation or termination of the court that provides for the terms of all stages of the transfer procedure, transfer of the judge to a court based on the territorial jurisdiction of cases that were considered in the court where the judge works, the criteria for determining the court to which the judge is transferred if it happens to be impossible to transfer them to the court based on the territorial jurisdiction	15%	Q4 of 2027	HCJ HQCJ SJA	
	IBM 23.2.2 Revised integrity vetting procedures for the Supreme Court and other high court judges.	Mechanisms have been introduced to prevent and timely detect violations committed by judges.	Introduction of digital tools for prompt detection of facts that may be indicative of violations.	launch of automated analytical tools for: a) detection and monitoring of cases of alleged tampering with or manipulation of the automated case assignment system (7%); b) detection and monitoring of an abnormal increase in cases of a certain category compared to previous periods (6%); c) identification and monitoring of abnormal periods of consideration of certain cases in relation to the average for other cases of this category, other cases of a judge, and other courts or judges (7%).	20%	Q1 of 2026	HCJ SJA	Paragraph 3.6 of Decision № 1814/0/15-25 of the HCJ dated 28.08.2025 (https://hcj.gov.ua/doc/doc/54211)
Strengthening control over judges' compliance with the requirements of anti-corruption legislation.			the procedure for full verification of judges' declarations has been approved	10%	Q2 of 2026	HCJ NACP		
				the procedure for monitoring the lifestyle of judges has been approved	10%	Q2 of 2026	HCJ NACP	

			Improvement of the procedure for verifying integrity declarations submitted by judges.	entry into force of a law that envisages: a) clarification of the content of the declarations and the grounds for starting the verification (3%); b) extension of the timeframe when the verification is possible (3%); c) improvement of the verification procedure by specifying the mechanisms and terms of verification (3%); d) establishment of the rights and obligations of individuals and legal entities involved in the verification process (3%); e) clarification of the legal consequences of the verification (3%); f) temporary involvement of independent experts delegated by international partners in the verification of integrity declarations of judges of higher courts (10%).	25%	Q2 of 2026	VRU Ministry of Justice HCJ HQCJ	Activity 1.2C.1.1. RM. The deadline is Q2 of 2025. Bodies-in-charge - Ministry of Justice, HCJ, and VRU.
			Verification of integrity declarations submitted by judges of higher courts with the involvement of independent experts delegated by international partners.	verification of integrity declarations of judges of higher courts has been completed	20%	Q1 of 2027	HQCJ HCJ	Activity 1.2C.1.5. The RM envisages: "Introduction of a temporary procedure for individual verification of the integrity declarations of judges of higher courts based on a risk-oriented approach involving independent experts with an advisory vote." The deadline is Q4 of 2026. Bodies-in-charge - HCJ and HCJ.
			Streamlining of the procedure for establishing the judge's compliance with the obligation to confirm the legality of the sources of origin of property.	entry into force of the law that lays down the procedure for dismissing a judge for violation of the obligation to confirm the legality of the sources of origin of their property, the rules for initiating this procedure, the standard of proof applied by the authorized bodies, the rights and obligations of the judge and the person who filed the relevant appeal, and the amount of property whose lawful origin must be proved by the judge.	15%	Q2 of 2027	VRU Ministry of Justice HCJ HQCJ	
	IBM 23.2.4 Advancement of vetting of sitting judges ...	The inevitability of liability for violations committed by judges is ensured.	Clarification of the elements of disciplinary misconduct related to the conduct of judges, taking into account the recommendations of GRECO.	entry into force of a law providing for: a) clarification of the "" norms of judicial ethics and standards of conduct that ensure public confidence in the court"" in determining the elements of disciplinary misconduct (5%); b) clarification of the elements of judicial disciplinary misconduct that belong to corruption and corruption-related offenses (5%);	10%	Q2 of 2026	VRU Ministry of Justice HCJ	Activity 1.2D.1.1. The RM envisages: "Drafting and adopting a law aimed to more accurately define disciplinary misconduct related to the conduct of judges, taking into account the recommendations of GRECO's Fourth Evaluation Round." The deadline is Q2 of 2026. Bodies-in-charge - Ministry of Justice, HCJ, and VRU.

IBM 23.2.5 Improved disciplinary and integrity systems.	Improving the procedure for initiating and considering disciplinary proceedings against judges.	entry into force of a law that provides for: a) increasing the possibilities of appealing decisions of the Disciplinary Chamber and the HCJ by complainants and disciplinary inspectors (5%); b) improvement of the mechanism for ensuring compliance with deadlines in disciplinary proceedings (5%); c) elimination of opportunities for judges to avoid disciplinary liability by resigning as regular (4%); d) introduction of the obligation for the HCJ to suspend consideration of a judge's resignation on the grounds specified in para. 1, 4 part 6 Art. 126 of the Constitution of Ukraine while disciplinary proceedings are pending (4%); e) specifying the mechanism for ensuring the consideration of disciplinary complaints on a priority basis, including granting the complainant the right to petition for the complaint to be given a priority status (4%); f) granting HCJ members the right to initiate disciplinary proceedings if they have reasonable information regarding an act committed by the judge that is indicative of a disciplinary offense (4%); g) expansion of the grounds for initiating disciplinary proceedings against judges (4%).	30%	Q2 of 2026	VRU Ministry of Justice HCJ	
	Improving the procedure for terminating the resignation of a judge.	entry into force of a law that provides for the introduction of additional grounds for the termination of the resignation of a judge, in particular, in the case of conduct that undermines the authority and public confidence in justice and the judiciary	10%	Q2 of 2026	VRU Ministry of Justice HCJ	
	Conducting an analysis of the practice of applying Unified Indicators for Assessment of Integrity and Professional Ethics of a Judge (Judicial Candidate)	results of the analysis have been published	5%	Q4 of 2026	HCJ HCCJ PIC CJU	
	Improvement of the Unified Indicators for Assessment of Integrity and Professional Ethics of a Judge (Judicial Candidate), taking into account the results of the analysis	making a decision by the HCJ to amend the Unified Indicators for Assessment of Integrity and Professional Ethics of a Judge (Judicial Candidate)	20%	Q1 of 2027	HCJ	

			Conducting a qualification assessment for sitting judges' compliance with the requirements pertaining to their position in accordance with clause 16-1 of Section XV "Transitional Provisions" of the Constitution of Ukraine with the involvement of the PIC.	the qualification assessment of judges who had to pass it as of 30.09.2016 has been completed	25%	Q4 of 2027	HQCJ HCJ	
	IBM 23.2.6 Improved allocation of cases.	No measures have been studied, since this IBM document seems to focus on the allocation of cases in the prosecutor's office (the relevant measures are provided for in the RM). In addition, the automatic allocation system used in the courts is to be improved as part of the development of a new UJITS, with a set of measures for its creation laid down in the Roadmap for the Development of IT Solutions in the Judicial System, which was approved by Order No. 534 of the SJA of Ukraine dated 02.12.2024.						
		The independence of judges is guaranteed in practice, cases of interference in judges' work are met with a proper and prompt response from the authorized bodies.	Conducting an analysis of the state of upholding judicial independence, current threats, and the effectiveness of existing measures, as well as presenting the necessary legislative and institutional improvements aimed at strengthening independence based on this analysis.	results of the analysis have been published	20%	Q1 of 2026	HCJ VRU	Activity 1.2.A.1.1 RM.
	Development of an action plan to increase the independence of judges, taking into account the results of the analysis.		an action plan has been published	25%	Q2 of 2026	HCJ VRU		
	Conducting an analysis of the practice of criminal prosecution under Art. 376 of the Criminal Code of Ukraine ("Interference in the Activities of the Judicial Authorities") and development of recommendations for improving the existing mechanism.		results of the analysis have been published	20%	Q4 of 2026	HCJ CJU PGO		

			Improving the procedure for holding persons criminally accountable under Article 376 of the Criminal Code of Ukraine, taking into account the recommendations developed based on the results of the analysis.	in at least 20% of criminal proceedings under Article 376 of the Criminal Code of Ukraine, indictments have been referred to the court	35%	Q4 of 2028	VRU PGO	
IBM 23.3 – Quality of the Judiciary Improved the quality of justice, including by significantly reducing the shortages of judges and of support staff, introducing an effective periodic performance evaluation of judges ... based on clear and objective rules and assessment criteria, ... and initial and continuous training for judges ...	IBM 23.3.1 Filling of judicial vacancies	The courts are provided with the necessary number of judges and support staff.	Ensuring a competitive level of judicial remuneration for judges and salaries for the support staff of courts, and other bodies and institutions of the justice system, taking into account the workload, significance, and responsibility of their work	the law on amendments to the Law of Ukraine "On the Judiciary and the Status of Judges" came into force, making it impossible to establish a separate subsistence level for able-bodied persons to determine the base official salary of a judge	5%	Q2 of 2026	VRU Ministry of Finance HCJ	Activity 1.1.B.1.3. RM
				amendments to by-laws aimed at increasing the salaries of civil servants in the court support staff, employees of executive support services, as well as other bodies and institutions of the justice system came into force	10%	Q2 of 2026	CMU HCJ SJA	
			Conducting a selection of candidates for the positions of local court judges, which was announced by the HQCJ on 11.12.2024.	approval of the rating of candidates for positions of judges and including candidates for positions of judges in the reserve for vacant positions of judges	5%	Q2 of 2026	HQCJ	
			Conducting a competition for vacant positions of judges in the High Anti-Corruption Court, which was announced by the HQCJ on 03.06.2025	appointment by the President of Ukraine to the positions of judges of at least 20 winners of the competition	15%	Q3 of 2026	HQCJ HCJ President of Ukraine	
			Conducting a competition for vacant positions of judges in the courts of appeal was announced by the HQCJ on 14.09.2023.	appointment by the President of Ukraine to the positions of judges of at least 360 winners of the competition	15%	Q4 of 2026	HQCJ HCJ President of Ukraine	

			Conducting competitions for vacant positions of judges in the Specialized District Administrative Court and Specialized Administrative Court of Appeal, announced by the HQCJ on 29.10.2025 (+ IBM 23.4.6).	appointment by the President of Ukraine to the positions of judges of at least 9 winners of the competition to the Specialized District Administrative Court and 5 to the Specialized Administrative Court of Appeal	15%	Q4 of 2026	HQCJ HCJ President of Ukraine	According to paragraph 82 of Section XII of the Law of Ukraine "On the Judiciary and the Status of Judges," the Specialized District Administrative Court and the Specialized Administrative Court of Appeal may begin their work provided that at least half of the judges of the relevant court are appointed based on the results of the competition.
			Conducting a competition for vacant positions of judges in the Supreme Court on the basis of an improved selection procedure.	appointment by the President of Ukraine to the positions of judges of at least 40 winners of the competition	15%	Q4 of 2027	HQCJ HCJ President of Ukraine	Activity 1.2.B.1.7. RM
			Conducting a competition for vacant positions of judges in local courts.	appointment by the President of Ukraine to the positions of judges of winners of the competition	15%	Q4 of 2027	HQCJ HCJ President of Ukraine	
			Conducting a study on the number of judges and support staff necessary to ensure the seamless operation of the judicial system, taking into account the financial capabilities of the state, optimizing the network of local courts, digitalizing the judicial system, and developing alternative methods of dispute resolution.	a report on analysis results has been published	5%	Q4 of 2028	HCJ HQCJ SJA CJU	
	IBM 23.3.2 Introduction of an effective periodic performance evaluation of judges ...	There is an effective system in place for identifying judges' individual training needs.	Development and approval of a program of courses for judges and representatives of public associations for periodic performance evaluation of judges.	course programs are published on the NJSU website	10%	Q2 of 2026	NJSU HQCJ	

			Development and approval of methodological recommendations for periodic performance evaluation of judges.	methodological recommendations have been published on the NJSU website	10%	Q2 of 2026	NJSU HQCJ	
			Development of special software for periodic performance evaluation of judges.	software has been launched to make possible periodic performance evaluation of judges	15%	Q2 of 2026	SJA HQCJ	
			Establishing the schedule for periodic performance evaluation of judges.	the schedule of periodic performance evaluation of judges has been approved	10%	Q3 of 2026	HQCJ	
			Summarizing intermediate results of periodic performance evaluation of judges.	a report on the results of the summary was published	15%	annually, but not later than the second quarter of the corresponding year	HQCJ NJSU	
			Conducting periodic performance evaluation of all sitting judges at least once.	all sitting judges have undergone a periodic performance evaluation at least once	40%	December 2028	HQCJ	Activity 1.3.A.4.2. RM. The deadline is the third quarter of 2027 (according to the authors, the deadline is unrealistic, due to the failure to perform the necessary preparatory measures as of the end of the first quarter of 2026).
	IBM 23.3.5 Judicial ... training	The measures were not identified separately due to the sufficient, according to the authors, specification at the level of the RM.						
IBM 23.4 – Efficiency of the Judiciary Enhanced the efficiency and performance of courts ..., including by ... advancing the digitalisation of justice system and establishing a new administrative court following a sound and credible selection of judges with the meaningful involvement of independent experts nominated by international partners	IBM 23.4.1 Improvement of efficiency of courts ...	There is a steady upward trend with changes in key performance indicators of the judicial system (clearance rate, number of pending cases, estimated time it takes to resolve a pending case in court (disposition time))	Improvement of the system of cassation filters in the procedural legislation.	entry into force of the law on amendments to the procedural legislation aimed to improve the system of cassation filters	15%	Q4 of 2026	Ministry of Justice SC VRU	Activity 1.3.A.1.2 RM

			Improvement of mechanisms to counter the abuse of procedural rights.	entry into force of the law on amendments to the procedural legislation aimed to improve the mechanisms for preventing and combating abuse of procedural rights	15%	Q4 of 2026	Ministry of Justice SC VRU	Activity 1.3.A.1.6 RM
			De-bureaucratization of the process of court case consideration by reducing the formalization of procedures and simplifying them insofar as it does not impair the guarantees of judicial protection.	entry into force of the law on amendments to procedural legislation	10%	Q4 of 2026	Ministry of Justice SC VRU	
			Conducting an audit of court dockets in order to identify the cases that are not subject to judicial review.	audit report has been published	5%	Q4 of 2026	SC VRU SJA	Activity 1.3.A.1.1 RM
			Taking measures to reduce the burden on the judicial system, informed by the audit.	entry into force of a law which provides for, inter alia: a) narrowing the categories of cases subject to consideration under separate proceedings (10%); b) introduction of mandatory pre-trial settlement of disputes for certain categories of cases (10%).	20%	Q4 of 2027	VRU Ministry of Justice HCJ	
			Introducing the possibility of hearing certain categories of cases online, regardless of the location of the parties and the court.	entry into force of the law on amendments to procedural legislation aimed at introducing the possibility of and procedure for extraterritorial consideration of cases	15%	Q4 of 2027	VRU Ministry of Justice HCJ	Activity 2.1.4.2.3. SACP
			Ensuring the unity of judicial practice.	entry into force of a law aimed to improve the mechanisms for ensuring the unity of judicial practice, including in cases that are not subject to cassation review	15%	Q4 of 2026	Ministry of Justice SC VRU	Activity 1.3.A.1.3 RM
				adoption of a strategy to ensure the unity of judicial practice	5%	Q1 of 2027	SC	Activity 1.3.A.1.4 RM (the deadline is by Q4 of 2026). This timeframe does not seem realistic, given that legislative changes to ensure the unity of judicial practice should also be adopted by Q4 of 2026. Without a doubt, it is advisable to develop the strategy after such changes have been made.

		Public access to complete, objective, and reliable data on the effectiveness of the judicial system is ensured.	Improving approaches to judicial statistics by introducing CEPEJ standards for its collection and publication.	amendments have been made to the SJA's regulations governing the maintenance, collection, and publication of judicial statistics	20%	Q3 of 2026	SC SJA	Activity 1.3.A.1.10. RM
			Development of a methodology for assessing the impact of proposed legislative changes on the formation, reorganization or liquidation of courts, the judicial system and the status of judges on the performance indicators of the judicial system.	making a decision by the HCJ to approve the methodology for assessing the impact of proposed legislative changes on the formation, reorganization or liquidation of courts, the judicial system and the status of judges on the performance of the judicial system	15%	Q3 of 2026	HCJ SJA	
			Development of a system for monitoring the work of the judicial system, which will include prompt collection and automated analysis of statistics (in particular, using the UJITS), as well as the organization and conduct of sociological research and surveys of users of judicial services and professional lawyers.	the system for monitoring the work of the judicial system has been launched	30%	Q4 of 2027	HCJ SJA CJU	Activity 1.3.A.1.8. The RM envisages: "Introduction of the use of the UJITS capacities for the administration of the judicial system through constant monitoring of key indicators associated with how court cases are received and considered". The deadline is Q4 of 2026. Bodies-in-charge - the Supreme Court, the SJA, the Cabinet of Ministers, the Ministry of Finance, and the Ministry of Digitalization.
			Introduction of a periodic (annual) survey of the public on trust in the court/ judiciary and an annual survey of court visitors in at least ten courts of various instances and jurisdictions, the list of which shall change every year.	the results of sociological surveys of the public and court visitors have been published	15%	annually, starting from Q4 of 2025	SC SJA	Activity 1.1.D.1.2. RM

			Conducting an assessment of the Ukrainian justice system according to the EU Justice Scoreboard methodology	a report on analysis results has been published	20%	annually	Ministry of Justice HCJ	
	IBM 23.4.5 Advancing the digitalisation of justice system.	No separate measures were identified due to the approval of the Roadmap for the Development of IT Solutions in the Judicial System by Order No. 534 of the SJA of Ukraine dated 02.12.2024.						
	IBM 23.4.6 Establishment of a new administrative court.	Measures are specified within the framework of IBM 23.3						

These indicators and measures are based on a comparative analysis of EU law and Ukraine's legal framework and practice regarding individual human rights. The methodology used to develop them involved:

1. Information on current EU legal acts concerning selected human rights, an assessment of the Court of Justice of the European Union's case law, and a systematization of key instruments such as directives, regulations, resolutions, and CJEU judgements related to individual human rights.
2. Information on pilot and other important judgements of the European Court of Human Rights ("leading cases") against Ukraine regarding certain human rights¹. To date, there are more than 250 such judgements (some of them have been implemented, but most of them have not been implemented for a long time). These judgements identify structural and systemic human rights issues and are generally fully consistent with EU acquis. Over the past decade, EU human rights law has largely developed under the influence of the European Convention on Human Rights and the case law of the European Court of Human Rights². In view of this, the Court's articulation of systemic problems serves as the foundation for establishing inconsistencies between Ukrainian law and EU acquis and thus determines the principal directions of human rights reform.

3. An analysis of the relevant provisions of Ukrainian legislation governing human rights issues and their application in practice. This had a substantial impact on determining priority measures and on the formulation of performance indicators and benchmark achievement rates. Obviously, this document does not reflect all human rights problems in Ukraine. Even with respect to individual human rights, the issues are narrowed to those we consider significant and requiring substantial changes in legislation or practice.

Certain target indicators and implementation measures coincide with those in the Roadmaps approved by the government. However, not all of them. This is due to many objective factors, such as the conditions for the development of Roadmaps and their approval. However, it appears that the implementation of EU law in Ukrainian legislation and practice cannot be achieved without the measures listed in this table, which will be reflected either in the Roadmaps or in subsequent implementation plans.

Many of these indicators have already been referenced in earlier documents, including the 2021–2023 National Human Rights Strategy³, the joint action plans of the Council of Europe and Ukraine, etc. Despite this, they were implemented only to a limited or superficial extent, or not at all, and did not address the fundamental issues in the field of human rights.

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1) For more information on Ukraine's implementation of ECHR judgments, see: <https://www.coe.int/en/web/execution/ukraine>

2) See, for example: Guide on the case-law of the European Convention on Human Rights https://ks.echr.coe.int/documents/d/echr-ks/guide_eu_law_in_echr_case-law_en-g?utm_source=chatgpt.com&brid=hPX5N7Cfl-txUyWNRWAjEw

3) <https://zakon.rada.gov.ua/laws/show/756-2021-%D1%80#Text>

Problem					
Interim benchmark	Implementation actions	Progress indicators	%	Deadlines	Bodies potentially in charge
Execution of judgments and application of the Case Law of the European Court of Human Rights. IBM 23.10.1	Change the legislation to introduce more effective procedures for the execution of ECHR judgements.	The law has been developed and adopted	100%	2026	Ministry of Justice, Verkhovna Rada of Ukraine
Enhanced legislative regulation of the Ukrainian Parliament Commissioner for Human Rights, taking into account the Paris Principles, Council of Europe and EU standards on National Human Rights Institutions, increase their financial transparency and accountability, IBM 23.10, IBM 23.10.2	1. Develop and adopt amendments to the law on the Ombudsman, ensuring the independence of the institution, the availability of resources and appropriate powers to perform its functions, and change the procedure for appointing the Commissioner	1. The law has been developed and adopted	40%	2026	Verkhovna Rada of Ukraine, Ukrainian Parliament Commissioner for Human Rights, Ministry of Justice
		2. A new Commissioner for Human Rights has been elected in accordance with the requirements of the new law	30%	2027	Verkhovna Rada of Ukraine
	2. With the participation of human rights organizations, develop a strategic plan for the development of the NHRI	The strategic plan for 2027–2030 has been adopted	10%	2027	Parliamentary Commissioner for Human Rights
	3. Improve public reporting on the financing of the Ombudsman from non-budgetary funds, annually publishing a financial report on the attraction and use of technical assistance	A public financial report for 2025–2026 has been published by the Human Rights Ombudsman	20%	2026	Parliamentary Commissioner for Human Rights
Bringing legislation on personal data protection in line with EU and Council of Europe standards, IBM 23.12	1. Develop and adopt laws aimed at harmonizing national legislation with Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 (General Data Protection Regulation) and the Council of Europe Convention for the Protection of Individuals with regard to Automatic Processing of Personal Data (Convention 108+)	A new version of the law on personal data protection and the law on amendments to other laws in connection with its adoption have been adopted; the necessary regulatory acts have been developed and adopted. Stages of implementation of new procedures for the collection and processing of personal data have been introduced.	60%	2026–2030	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers
	2. Establish a system for law enforcement agencies to process personal data for law enforcement purposes	Draft amendments to legislation and departmental orders on the collection and processing of personal data have been prepared involving international experts	20%	2026–2030	Verkhovna Rada of Ukraine, MIA, NABU, SSU, SBI, Prosecutor General's Office, Ministry of Justice
	3. Develop a unified legal mechanism for the use of tracking tools	A draft law on the implementation of such mechanisms has been developed and adopted; amendments to regulatory acts have been made and new procedures have been put in place	10%	2026–2030	Verkhovna Rada of Ukraine, MIA, NABU, SSU, SBI, Prosecutor General's Office, Ministry of Justice, Cabinet of Ministers
	4. Streamline legal procedures that ensure the confidentiality of communication services and prevent the possibility of eavesdropping and interception	Amendments to the CPC and other laws have been drafted and adopted; relevant regulatory acts have been developed	10%	2026–2030	Verkhovna Rada of Ukraine, MIA, NABU, SSU, SBI, Prosecutor General's Office, Ministry of Justice, Cabinet of Ministers

Developing legislation and creating an independent body for the protection of personal data, IBM 23.12	1. Develop and adopt a draft law; develop and adopt a draft law on amendments to other laws in connection with the adoption of this law; development of relevant regulatory acts by the Cabinet of Ministers and other authorities	Appropriate regulations have been adopted to create a commission	50%	2026–2027	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers
	2. Establishment of the National Commission for the Protection of Personal Data, which will perform the functions of a supervisory authority in accordance with EU standards	The necessary resources have been allocated, the Commission has started its work	30%	2027–2028	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers
	3. Appointment of members of the National Commission for the Personal Data Protection through a competitive selection process	A competition has been held as well as the necessary procedures for the appointment of commission members	20%	2027	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers
Ensured further progress towards legislative alignment of national law with the EU acquis on equality and non-discrimination, IBM 23.14	1. Amend the non-discrimination legislation to broaden the list of protected grounds, including categories such as “sexual orientation” and “gender identity.” Introduce clear provisions in national legislation that comply with the requirements of Directive 2000/43/EC (Racial Equality Directive) and Directive 2004/113/EC aimed to ensure equal treatment for women and men in the access and supply of goods and services. Enshrining mandatory requirements for reasonable accommodation for persons with disabilities.	1. Amendments to the non-discrimination law and other laws	30%	2026–2027	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers, Ministry of Social Policy
		2. Legislation on protection against racial discrimination has been updated.			
		3. Legislation on equal access to goods and services for women and men has been updated			
		4. Mandatory requirements for reasonable accommodation for persons with disabilities have been incorporated in the legislation.			
	2. Drafting and adopting a law that defines the legal status of registered partnerships, as well as the partners' personal and property rights, obligations, and their protection	The law on the status of registered partnerships has been adopted, and related amendments have been made to the legislation.	30%	2026	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers
3. Establishment of an independent anti-discrimination body to consider individual complaints, ensure effective monitoring and control over the implementation of anti-discrimination legislation, and introduce non-discrimination policies.	The anti-discrimination body has assumed its proper powers and started its activities.	30%	2026–2027	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers	
4. Ensuring access to justice for persons with disabilities and other vulnerable groups, including by improving physical accessibility, providing digital participation tools, and ensuring adequate information access and sign language interpretation.	The necessary legislation and a plan for its enforcement have been adopted	10%	2026–2030	Verkhovna Rada of Ukraine, Ministry of Justice, Cabinet of Ministers	
Ensured accountability for hate (intolerance) or discriminatory offenses, IBM 23.14	1. Development and adoption of a law amending the Code of Ukraine on Administrative Offenses and the Criminal Code of Ukraine in order to establish: administrative liability for discrimination; committing a criminal offense on grounds of intolerance (including based on “gender identity” and “sexual orientation”) as an aggravating circumstance; criminal liability for public calls for violence on the grounds of intolerance (including based on “gender identity” and “sexual orientation”)	The draft law has been drafted, submitted to the Parliament, and adopted in the first and second readings	60%	2026	Verkhovna Rada of Ukraine, Ministry of Justice, Ministry of Internal Affairs, Cabinet of Ministers, Prosecutor General's Office
	2. Establish clear procedures for investigating hate crimes (intolerance) or discrimination	Recommendations for investigating this category of crimes have been developed and implemented within law enforcement agencies, and training has been provided to investigators and prosecutors on how to handle such cases	20%	2026–2027	Ministry of Internal Affairs, Office of the Prosecutor General, Training Centre for Prosecutors

	3. Identify mechanisms for collecting data on the number and nature of hate crimes (intolerance) and discrimination	Standardized reporting forms for hate crimes and discrimination have been developed and introduced for use by law enforcement agencies.	20%	2026–2027	Cabinet of Ministers, Ministry of Justice, Ministry of Internal Affairs, Prosecutor General's Office, State Statistics Service
Prohibition of torture and other forms of ill-treatment, IBM 23.11	1. Development and adoption of laws, acts of the Government and decrees of the President of Ukraine, taking into account the recommendations of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment, aimed at: further implementation of international standards in the field of enforcement and serving of criminal sentences		30%	2026–2030	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, MIA, SBI
	2. Ensuring the photographic documentation of bodily injuries of convicted persons and detainees in accordance with the standards of the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment.	Mechanisms of photographic documentation have been developed, relevant regulatory legal acts have been drafted, adopted, and implemented in practice	10%	2026–2030	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, MIA, SBI
	3. Development of standardized statistical reporting forms and data collection systems on the outcomes of investigations into torture and other forms of ill-treatment	The necessary legal acts have been developed and adopted to ensure that, starting from 2027, the required data will be collected to enable continuous monitoring of the situation	10%	2027	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, MIA, SBI, State Statistics Service
	4. Establishment of specialized units within the central office and regional departments of the State Bureau of Investigation to address cases of torture and other forms of ill-treatment	Special units have been introduced, they are properly staffed and trained	10%	2026–2027	Office of the Prosecutor General, SBI
	5. Drafting and adopting a law introducing an additional mechanism of parliamentary oversight over law enforcement agencies and the prosecution service, by requiring the Prosecutor General's Office and the State Bureau of Investigation to submit annual public reports to the Verkhovna Rada of Ukraine on their work in investigating cases of torture and other ill-treatment, as well as on the protection of victims	A reporting mechanism has been developed, along with the necessary regulatory framework for its implementation starting in 2027	10%	2026–2027	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, MIA, SBI, SSU
	6. Complete the transfer of health care facilities of the penitentiary system to the Ministry of Health of Ukraine		20%	2026–2028	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, MIA, Ministry of Health
	7. Strengthen human rights monitoring in penitentiary institutions and ensure effective protection for complainants, victims of torture and ill-treatment, and witnesses, while also facilitating the investigation of torture cases and ensuring that those responsible are held accountable	The legislative framework governing the National Preventive Mechanism and the monitoring of identified violations has been strengthened, and funding for monitoring visits has been secured	10%	2026–2030	Verkhovna Rada of Ukraine, Ministry of Justice, Prosecutor General's Office, SCESU, Verkhovna Rada Commissioner for Human Rights, SBI, SBU

Ensuring the right to freedom of thought, belief and religion	1. Ensuring the right to conscientious objection to military service on the grounds of religious belief	Drafting and adopting a law to ensure the right to perform alternative service during martial law and other special periods, and bringing legislation on alternative service into line with European standards	60%	2026	Ministry of Justice, Verkhovna Rada of Ukraine, Ministry of Defense, Cabinet of Ministers, State Service of Ukraine for Ethnic Affairs and Freedom of Conscience
	2. Drafting and adopting a law on the restitution of property of religious organizations that was confiscated during the Soviet era and is currently held in state or communal ownership	Legal mechanisms for restitution of property of religious organizations identified in accordance with the recommendations of the Council of Europe, relevant law and by-laws have been developed and adopted	20%	2026-2030	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, State Service of Ukraine for Ethnic Affairs and Freedom of Conscience
	3. Drafting and adopting a law establishing mechanisms for religious organizations to lease religious and other buildings, as well as land plots, that are in state or communal ownership	A law regulating the procedure for leasing state and municipal property, including land plots, by religious organizations has been developed and adopted	20%	2026-2028	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, State Service of Ukraine for Ethnic Affairs and Freedom of Conscience
Ensuring freedom of expression and media pluralism, IBM 23.13	1. Ensuring the independence of the National Media Regulator	1. Amendments have been made to the legislation, including on martial law, which make it possible to terminate powers early by expressing no confidence.	20%	2026	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, National Council on Television and Radio Broadcasting
		2. Adequate funding has been secured, taking into account submitted proposals, to ensure the functioning of the National Council of Ukraine on Television and Radio Broadcasting in accordance with the principle of a balanced budget in the preparation of the relevant budget declaration as well as the draft State Budget of Ukraine for the respective year	30%	2026	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, National Council on Television and Radio Broadcasting, Ministry of Finance
		3. Provisions requiring mandatory approval of decisions by the media regulator with the Ministry of Justice have been removed from the legislation.	10%	2026	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, National Council on Television and Radio Broadcasting
	2. Ensure the independence and stable functioning of public media in Ukraine by creating conditions for their continuous and sustainable development, thereby enabling their effective operation	Adequate funding has been secured, taking into account submitted proposals, to ensure the functioning of the National Public Broadcasting Company of Ukraine in line with the principle of a balanced budget, both during the preparation of the relevant budget declaration and in the draft State Budget of Ukraine for the respective year	40%	2026	Ministry of Justice, Verkhovna Rada of Ukraine, Cabinet of Ministers, National Council on Television and Radio Broadcasting, Ministry of Finance

Ensuring the enforcement of judgements as part of the right to a fair trial, IBM 23.10.1, IBM 23.4.4	1. Introduction of an effective bankruptcy procedure for enterprises owned or managed by the state, revision of moratoriums on enforcement of court judgements against these entities	1. An effective bankruptcy procedure has been developed and introduced	10%	2026-2030	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Finance, Ministry of Justice
		2. A three-year plan for lifting the moratorium, to be completed by 2030, has been adopted	10%	2026-2030	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Finance, Ministry of Justice
	2. Introduce effective mechanisms of judicial oversight over the enforcement of decisions of national courts	1. Judicial oversight over the enforcement of all court decisions has been established, including cases where the debtor is the state or a public authority	10%	2026-2030	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Finance, Ministry of Justice
		2. Sanctions for failure to comply with court decisions that may be imposed by courts on debtors, relevant officials, and public authorities have been strengthened	10%	2026-2030	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Finance, Ministry of Justice
	3. Simplification of procedures for the enforcement of court decisions	1. Enforcement proceedings have been digitized, in particular, the procedures for issuing a writ of execution, court orders and other documents	10%	2026	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Finance, Ministry of Justice
		2. The powers of private enforcement officers have been expanded, and the allocation of responsibilities between private and public enforcement officers has been streamlined	10%	2026	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Justice
		3. Introduction of automatic blocking and collection of funds from the accounts of debtors, including state-owned ones has been ensured	10%	2026	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Justice
		4. The procedure for enforcing court decisions, including the simultaneous application of sanctions, has been streamlined	10%	2026	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Justice, SSU, National Security and Defense Council of Ukraine
		5. Incentive mechanisms have been introduced to encourage voluntary compliance with court decisions, along with provisions allowing enforcement officers to grant deferrals or payment instalments by mutual agreement.	10%	2026	Verkhovna Rada of Ukraine, Cabinet of Ministers, Ministry of Justice

Migration, Asylum, and Border Management

Author: **Iryna Sushko**

4

The areas of focus represent the list of problems and challenges to be addressed by such strategic documents as the Integrated Border Management Strategy after 2025, the Strategy for State Migration Policy for the period until 2025 and the Rule of Law Roadmap regarding Migration, Asylum and Borders. Also, the referred to areas are part of the “Justice, Freedom and Security” (JFS) sector, which is a key area of cooperation between Ukraine and the EU, including internal affairs, justice, migration, fighting transnational crime (terrorism, human trafficking, money laundering, and drugs), and the protection of human rights. The JFS component was established in order to introduce common standards, implement European law, and enhance security in the context of free movement of people, which is regulated by the Association Agreement and the EU-Ukraine Action Plan.

The identified indicators are basic and cross-cutting. Their implementation makes it possible to change approaches and principles in the field of migration, asylum, and borders. In addition, they are fundamentally important for European integration progress. Certain tasks will contribute to Ukraine’s integration into the EU security space. For example, the process of European integration opens the path to the EU’s common systemic security structures through more effective coordination with European countries in the field of control over migration crises and respect for human rights and freedoms.

The adoption of modern, security-focused approaches to migration management is closely aligned with the priorities of cooperation between Ukraine and the EU. These priorities include establishing a structured national coordination mechanism for responding to migration crises, as well as improving information sharing between Ukrainian authorities and international partners about individuals who may pose a threat to national security.

Coordination between authorities, domestically and internationally, plays a key role in evaluating migration processes. In particular, the exchange of information between migration and border management actors will contribute to the quality of risk analysis and decision-making.

It is impossible to imagine migration management without comprehensive policies and measures to counter cross-border crime aimed at preventing challenges to Ukraine’s national security such as terrorism, illegal migration, human trafficking, smuggling, especially of weapons and ammunition, organized crime, etc.

One tool for controlling illegal migration is readmission, an effective mechanism for transferring foreigners and stateless persons who lack—or have lost—legal grounds to remain in Ukraine.

It is important to ensure conditions for asylum seekers, with respect for fundamental human rights. In the context of European integration, asylum policy calls for updated approaches, particularly in the light of a new key document adopted by the EU—i.e. the New Pact on Migration and Asylum.

At the same time, it is necessary to introduce new return policies: “voluntary return” and “migration amnesty”. This will contribute to the creation of an active return policy and will make it possible to integrate the Ukrainian readmission system into the pan-European security architecture.

Effective migration and border management relies on advanced, flexible, and interoperable technical solutions that are integrated with the EU’s large-scale IT infrastructure. The relevant authorities should be able to make the most effective use of state-of-the-art technologies to create a well-developed, flexible, and effective management system.

A key component in setting indicators is the sphere of ‘legal migration’, which entails aligning with international standards on the right to temporary or permanent residence and employment. It is necessary to ensure effective counteraction to bureaucratic and discriminatory restrictions.

A further challenge in border management lies in drafting a Schengen plan and bringing border control legislation into closer alignment with EU policies and best practices.

Schengen is a key pillar of the European Union and one of the most tangible manifestations of European cooperation and integration. Within the EU legal system, it makes up an integral part of European Union law (*acquis communautaire*), which all candidate countries are obliged to fully accept as a condition of accession to the EU. Given its status as an EU candidate, Ukraine is also on the path toward Schengen accession, so preparing a Schengen plan should be a central priority in border development efforts.

Interim benchmark	Interim benchmark measures	Strategic objective	Implementation actions	Progress indicators	Deadlines	Bodies in charge	Notes
Improved alignment with the EU acquis regarding migration, asylum, visa policy and border management, including further alignment with the European IBM methodology	IBM 24.11.1 Make tangible progress with aligning the legislation with the Schengen acquis, including by establishing national Schengen Governance and by developing an Action Plan for the implementation of the Schengen system (Schengen Action Plan).	A Schengen Action Plan has been developed and approved by the Government	Establish a temporary working group for the development of a Schengen Action Plan, which will include relevant authorities engaged in integrated border management.	A temporary working group has been established	2/2 2026	ASBGS	Report on Ukraine's progress under the EU enlargement package for 2024 with regard to the Schengen Area and External Borders (2.2.2. Chapter 24 JFS) specifies that according to the institutional structure and harmonization of legislation there is no action plan for the Schengen Agreement. Border control legislation only partly conforms to EU policies and best practices. To support the implementation of these recommendations, it is necessary to create a national Schengen management system, which should be accompanied by a Schengen Action Plan, which all candidate countries should develop and implement during the accession stage. The Schengen Action Plan must cover all relevant legislative and operational measures, which is part of the Schengen acquis, as well as acts supplementing or related thereto and contributing to the functioning of the Schengen Area. In addition, the plan should be supported by an effective monitoring and follow-up mechanism.
	IBM 24.11.2 Make tangible progress with aligning the legislation on migration with the EU acquis		Develop a draft Schengen Action Plan reflecting regulatory and operational changes in line with the Schengen legislation and the Schengen Borders Code	A draft Schengen plan has been developed and approved by the Government			
	IBM 24.11.3 Make tangible progress with alignment with the EU acquis regarding asylum including by conducting a needs analysis related to the future implementation of the new Pact on Migration and Asylum and taking into account the Action Plan on Integration and Inclusion 2021-2027	<p>The State Migration Policy of Ukraine is harmonized in accordance with EU standards, in particular the EU Pact on Migration and Asylum (strategic goal)</p> <p>Establish a unified and transparent procedure for processing asylum applications, including an appeals mechanism, in line with EU standards and the recommendations of the European Union Agency for Asylum (EUAA), in particular:</p> <ul style="list-style-type: none"> • fast-track border procedure; • assessment of safe countries of origin; • mechanism for assessing the risks of a migration crisis. (implementation measure) 			Standard operating procedures for interagency cooperation in migration crises have been developed. (indicator) A plan for the introduction of screening at the state border of Ukraine has been developed. (indicator)		ASBGS, SMS

	IBM 24.11.4 Make tangible progress with alignment with the EU acquis regarding visa policy	The visa policy of Ukraine is consistent with the visa policy of the European Union.	Introduce visa and visa-free regimes with countries in accordance with the EU lists	Visa regimes have been modified in line with those of the EU	early 2028	MFA	The tasks aimed at the alignment of Ukraine's visa policy with that of the EU are cross-cutting and are contained in the Rule of Law Roadmap and the Strategy of Migration Policy until 2025 and are part of the tasks from the Schengen Action Plan.
	IBM 24.11.5 Make tangible progress with aligning the legislation on border management with the EU acquis, including with IBM methodology.	The Advance Passenger Information / Passenger Name Record (API/ PNR) system has been implemented. The system operates in accordance with EU standards for pre-arrival risk assessment before the person arrives at the border	Ensure that legislation governing API and PNR complies with the requirements of EU Regulations 2025/12 and 2025/13, particularly with regard to integrating API and PNR into a single system.	The national Passenger Information Unit (PIU) has been established, and passenger information is collected, processed and exchanged in accordance with the objectives and rules established by EU law, in particular Directive (EU) 2016/681 and EU Regulations 2025/12 and 2025/13	Within 2026	ASBGS, MIA	According to the EU screening report, Cluster 1, Clause I.k, subsection "Fighting Organized Crime") Chapter 24 Justice, Freedom and Security, Ukraine's legal framework in the field of law enforcement cooperation is partially aligned with the relevant EU acquis. Comprehensive legislation on the collection, processing and sharing of PNR data needs to be adopted and implemented. Also, there is no passenger information unit (PIU) in Ukraine. At the same time, Ukraine already has a government plan for creating an API/ PNR system, enshrined in the Rule of Law Roadmap and the Strategy for Integrated Border Management until 2025. Introducing a system to assess Advance Passenger Information will strengthen security at air border crossing points. This system is also used to counter transnational crime and terrorism, in particular in accordance with EU Directive 2016/681 of the European Parliament and of the Council of 27 April 2016
Enhanced its institutional capacities, cooperation and coordination mechanisms among authorities involved in the management of migration, borders and asylum and reinforced the fight against irregular migration and migrant smuggling	IBM 24.12.2 Strengthening interagency cooperation and coordination among all stakeholders in IBM; including establishing a mechanism for interagency coordination during a migration crisis and developing accompanying methodological and training materials.	The State Migration Policy of Ukraine is harmonized in accordance with EU standards, in particular the EU Pact on Migration and Asylum.	Develop dialogue with partner states and strengthen Ukraine's capacity to return persons who have no grounds to stay on its territory, in compliance with international standards, in particular the principle of non-refoulement and human rights.	Participation of State Border Guard Service of Ukraine personnel in TAIEX training events on best European practices for implementing control procedures at EU external border crossing points was ensured	2/2 2026	ASBGS, SMS	

	IBM 24.12.4 Improved track record in cases related to migrant smuggling, confirmed by statistical data encoded yearly in the e-platform.	Put in place mechanisms to facilitate information sharing and coordinated risk analysis between Ukrainian authorities and those in migrants' countries of origin and transit.					
		Border infrastructure has been modernised to support the reception conditions required for implementing border asylum and border return procedures, in line with Article 43 of EU Regulations 2024/1348 and 2024/1349.	Restore the functioning of the reconstructed temporary detention facilities.	Internal facilities have been arranged in places of temporary detention. Temporary detention facilities have been put into operation. late 2026	SMS, ASBGS	Ukraine must ensure that asylum seekers enjoy their rights and freedoms throughout asylum procedures and while in detention. Checkpoints should be equipped with adequate conditions for the detention of individuals detained for violations of border laws. To this end, the temporary detention facilities of the state border guard agencies of Ukraine should be reconstructed.	
Improved its asylum system, including procedures guaranteeing the rights to apply for asylum and to appeal decisions							

Law Enforcement Reform

5

A professional, accountable, and effective law enforcement system is essential for maintaining security, protecting society from unlawful acts, and reinforcing the rule of law. In addition, the success of the reform is a key factor in Ukraine's progress toward European Union membership, particularly in ensuring effective cooperation between Ukraine, as a future EU member, and EU member states and institutions in combatting crime. Amid armed aggression and post-war recovery, the importance of law enforcement agencies continues to grow, since their effectiveness is essential for combating crime, corruption, and organized threats to security, while also maintaining public confidence in state institutions.

The European Commission's Enlargement Reports, particularly the 2025 Report on Chapter 24 "Justice, Freedom and Security," consistently note that despite the existence of strategic documents and ongoing reforms, Ukraine's law enforcement system continues to face deep structural challenges. According to the European Commission, implementation of the Comprehensive Strategic Plan for Law Enforcement Reform is underway, but progress remains uneven and fragmented, with insufficient emphasis on measurable outcomes. The key challenges include the unfinished institutional reform of individual agencies, weak accountability mechanisms both within and outside institutions, inadequate safeguards for institutional independence, inconsistent and opaque

personnel procedures, and limited management and analytical capabilities. The European Commission draws particular attention to systemic shortcomings in the field of penitentiary and probation, in particular in terms of conditions of detention, staffing, and management efficiency.

This study aims to identify and develop interim benchmarks that would make it possible to assess the progress of law enforcement reform in the context of the negotiation process, particularly regarding compliance with the rule of law and the expectations of the European Union. The proposed approach to the development and application of benchmarks is intended as a practical mechanism that allows stakeholders to evaluate the state of reform implementation at any stage and, if needed, identify emerging needs, challenges, and risks. The study focuses on the institutional dimension and the necessary changes in the operation of eight major law enforcement agencies of Ukraine:

- State Bureau of Investigation;
- National Police of Ukraine;
- National Anti-Corruption Bureau of Ukraine;
- Economic Security Bureau of Ukraine;

- National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes (Asset Recovery and Management Agency or ARMA);
- Penitentiary Service (State Service for the Execution of Criminal Punishments) and Probation Service.

There are also benchmarks for changes in the field of vocational education for law enforcement officials and its institutional separation from higher legal education.

The criteria and their components were developed on the basis of the European Commission’s enlargement reports, current Ukrainian state policy documents — in particular the Roadmap on the Rule of Law, the Comprehensive Strategic Plan for Law Enforcement Reform and the accompanying implementation Action Plan, the State Anti-Corruption Program, the Penitentiary System Reform Strategy and its Operational Implementation Plan — as well as materials and studies produced by independent think tanks. At the same time, an analysis of the preparation, approval, and adoption of these documents shows the need to address existing gaps and introduce changes that could significantly transform the functioning of law enforcement agencies and eliminate the root causes of their inefficiency.

The interim benchmarks proposed in this study are intended to address the existing gap by supplementing current public policy documents with a tool that not only formally records the implementation of individual measures but also assesses the real institutional impact of reforms on the ability of law enforcement agencies to act effectively, independently, professionally, and in line with European Union standards. This approach also provides an opportunity to systematically evaluate the progress of reforms throughout the various stages of Ukraine’s EU accession negotiations, allowing the Government of Ukraine to track compliance with approved plans and detect potential deviations from schedules and risks of missing deadlines. At the same time, for European partners, the system of interim benchmarks provides a more comprehensive and structured understanding of the actual state of reform implementation, going beyond formal reporting on completed measures. For civil society and the general public, such benchmarks provide a basis for effective monitoring of reform progress, early identification of problems and risks, and the development of informed responses to cases of slowdown, superficial implementation, or deviation from declared goals.

Interim benchmark	Implementation actions	Progress indicators	Percentage	Deadline	Agency in charge	Notes
The status of the State Bureau of Investigation corresponds to the Constitution of Ukraine	Transformation of the State Bureau of Investigation from a state law enforcement agency to a central executive body	Amendments to the Law on the State Bureau of Investigation	15%	Q2 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
	Introduction of competitive selection for the position of Director of the State Bureau of Investigation	The Law on the State Bureau of Investigation has been amended to establish a competitive selection procedure designed to prevent political interference in appointments. The procedure should provide for evaluating candidates' integrity and professional competence.	15%	Q2 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	EC Enlargement Report
		Director of the State Bureau of Investigation has been appointed in accordance with the updated procedure	20%	Q4 2026	Cabinet of Ministers of Ukraine	
	Introduction of a meritocratic approach to the selection of personnel to the SBI and holding competitions.	Appointment of detectives of the State Bureau of Investigation based on the results of open competitive procedures with updated qualification requirements and integrity criterion	10%	Q4 2027	Director of the State Bureau of Investigation	
	Transitioning the State Bureau of Investigation toward a more civilian-oriented staffing	Amendments have been made to the Laws on the State Bureau of Investigation and on Operational and Investigative Activities, as well as the Criminal Procedure Code to introduce the position of a detective of the State Bureau of Investigation	10%	Q4 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	CSP (clause 4.8)
		Withdrawal of enlisted personnel from the State Bureau of Investigation and their replacement by employees and civil servants	10%	Q2 2027	Cabinet of Ministers of Ukraine Director of the State Bureau of Investigation	
		Management personnel make up % of the total staff of the State Bureau of Investigation	5%		Director of the State Bureau of Investigation	
	Ensuring full public control over the activities of the State Bureau of Investigation	Amendments to the Law on the State Bureau of Investigation to renew the composition and powers of the Public Control Council	10%	Q4 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
		Updating the composition and powers of the Public Control Council under the State Bureau of Investigation	5%	Q1 2027	Cabinet of Ministers of Ukraine Director of the State Bureau of Investigation	

The activities of the National Police of Ukraine are open and transparent	Introduction of competitive selection procedures for managerial and staff positions in the National Police of Ukraine, along with the establishment of fixed terms of office	Amendments to the Law on the National Police of Ukraine regarding competitive selection for management positions	15%	Q4 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	EC Enlargement Report	
		Head of the National Police of Ukraine and their deputies have been appointed in accordance with the updated procedure	15%	Q2 2028	Cabinet of Ministers of Ukraine		
		Exclusively competitive selection for police officer positions in the National Police of Ukraine	10%		Head of the National Police of Ukraine		
		Amendments have been made to the Laws on the National Police of Ukraine and on Operational and Investigative Activities, as well as the Criminal Procedure Code to introduce the position of a detective of the National Police of Ukraine	15%	Q4 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	CSP (clause 4.8)	
		Appointment of detectives of the National Police of Ukraine based on the results of an open competition	15%	Q4 2027	Head of the National Police of Ukraine		
	Ensuring full public control over the activities of the National Police of Ukraine	The presence and functioning of a structured mechanism for the independent and regular assessment of public confidence in the National Police of Ukraine within the public accountability system, with results published and reflected in the NPU's activities	10%	Regularly	Cabinet of Ministers of Ukraine, MIA of Ukraine, National Police of Ukraine		
		The Law on the National Police of Ukraine has been amended to strengthen the personnel and disciplinary competences of police commissions, including broader powers to review disciplinary cases and the creation of commissions at other tiers	10%	Q4 2026	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine		
		Updated composition and powers of all police commissions	10%	Q4 2026	Head of the National Police of Ukraine		
	Institutional independence of the National Anti-Corruption Bureau of Ukraine is ensured	Strengthening the regulatory and institutional framework to ensure the procedural independence of the National Anti-Corruption Bureau of Ukraine.	Amendments have been made to the Criminal Procedure Code regarding: - powers in terms of international legal assistance, including extradition; - expansion of investigative jurisdiction to include positions with a high corruption risk	15%		Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
			No criminal cases falling under the jurisdiction of the National Anti-Corruption Bureau of Ukraine are investigated by other pre-trial investigation authorities	10%	Regularly	Prosecutor General, heads of pre-trial investigation bodies	
Activities of the National Anti-Corruption Bureau of Ukraine is subject to external independent audit		The 2025 external independent audit recommendations have been put into effect.	15%	Q2 2027		EC Enlargement Report	
		The effectiveness of the Internal Control Department of the National Anti-Corruption Bureau of Ukraine is evidenced by well-functioning disciplinary and preventive systems.	15%				

		An electronic case management system has been implemented	15%		Director of the National Anti-Corruption Bureau of Ukraine	
	Conducting an independent competitive selection procedure for the position of Director of the National Anti-Corruption Bureau of Ukraine	Conducting the next external independent audit	15%	Q2 2027	Director of the National Anti-Corruption Bureau of Ukraine	
		New Director of the National Anti-Corruption Bureau of Ukraine has been appointed	15%	Q2 2030	Cabinet of Ministers of Ukraine	
Effective activities of the Bureau of Economic Security of Ukraine	Activities of the Bureau of Economic Security of Ukraine are subject to external independent audit	Conducting the next external independent audit	30%	Q3 2026	Director of the National Anti-Corruption Bureau of Ukraine	
		Recertification of all employees of the Bureau of Economic Security of Ukraine	40%	Q1 2027	Director of the National Anti-Corruption Bureau of Ukraine	
	Adoption of regulatory and organizational measures aimed at ensuring the procedural independence of the Bureau of Economic Security of Ukraine.	No criminal cases falling under the jurisdiction of the Bureau of Economic Security of Ukraine are investigated by other pre-trial investigation authorities	30%	Regularly	Prosecutor General, heads of pre-trial investigation bodies	EC Enlargement Report
Effective activities of ARMA	Activities of ARMA are subject to external independent audit	Conducting the next external independent audit	30%	Q3 2026	Head of ARMA	
	The law on competitive selection for the position of ARMA head was implemented in practice.	Head of ARMA has been appointed	40%	Q1 2027	Cabinet of Ministers of Ukraine	
	Taking measures to ensure the procedural independence of the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes (ARMA)	Amendments to the Criminal Procedure Code on the management of seized property in accordance with EU Directives 2014/42/EU and 2024/1260	30%	Q4 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	EC Enlargement Report
The penitentiary and probation services operate in compliance with European standards.	Establishment of the Penitentiary Service as a central executive body	Adoption of the Law on the Penitentiary System	10%	Q1 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
		Establishment of the Penitentiary Service	5%	Q1 2027	Cabinet of Ministers of Ukraine	
	Introduction of competitive selection procedures for the positions of Head of the Penitentiary Service, their deputies, Head of the Probation Service, their deputies, and service personnel	Adoption of the Law on the Penitentiary System and amendments to the Law on Probation	5%	Q1 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	

		Head of the Penitentiary Service has been appointed in accordance with the updated procedure	5%	Q3 2027	Cabinet of Ministers of Ukraine	
		Head of Probation Service has been appointed in accordance with the updated procedure	5%	Q3 2027	Minister of Justice of Ukraine	
Transitioning the Penitentiary Service toward a more civilian-oriented staffing		Adoption of the Law on the Penitentiary System	5%	Q1 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
		Withdrawal from the penitentiary service of privates and commanders (except for security units and special units) and their replacement by employees and civil servants	5%	Q4 2027	Head of the Penitentiary Service	
		Rank-and-file officers and command staff constitute % of all employees of the penitentiary service	5%	Q1 2028	Head of the Penitentiary Service	
The functions and structure of the penitentiary system comply with the Constitution of Ukraine		Amendments have been introduced to the Law on Operational and Investigative Activities and the Criminal Procedure Code to remove operational and investigative functions from the penitentiary service	10%	Q1 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
		Transfer of operational investigative files to other authorized bodies of pre-trial investigation	5%	Q2 2027	Head of the Penitentiary Service, heads of pre-trial investigation bodies	
		Provision of medical care to detainees and convicted persons within the unified state healthcare system, with relevant healthcare institutions integrated into this system	5%	Q2 2027	Ministry of Justice MoH	
		Ensuring the effective operation of Complaint Review Boards addressing inadequate detention conditions, including further examination of possible improvements and additional mechanisms	5%	Regular	Ministry of Justice Penitentiary Service	
		The Law on the Establishment of a Dual System of Regular Penitentiary Inspections has been adopted	10%	Q4 2027	Verkhovna Rada of Ukraine Cabinet of Ministers of Ukraine	
		Establishment of penitentiary inspections	5%	Q1 2028	Ministry of Justice	
		Elimination of the prosecutor's office's role in overseeing penitentiary institutions	10%	Q1 2028	Prosecutor General	

High-quality legal education and education of law enforcement officers	Distinct institutional training pathways for the specialties of "Law" and "Law Enforcement."	Suspension of enrolment of first-year undergraduate and graduate students in the "Law" specialty at higher education institutions with special study conditions	50%		Cabinet of Ministers of Ukraine MES MIA Ministry of Justice Security Service of Ukraine	
		Suspension of enrolment of first-year postgraduate and doctoral students in the "Law" specialty at higher education institutions with special study conditions	50%		Cabinet of Ministers of Ukraine MES MIA Ministry of Justice Security Service of Ukraine	<ul style="list-style-type: none"> - National Academy of Internal Affairs - Kharkiv National University of Internal Affairs - Dnipro State University of Internal Affairs - Lviv State University of Internal Affairs - Odessa State University of Internal Affairs - Donetsk State University of Internal Affairs - Penitentiary Academy of Ukraine - National Academy of the Security Service of Ukraine - National University of Civil Protection of Ukraine

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- development of expert-analytical materials to promote European integration reforms in Ukraine;
- promotion of European values among Ukrainian society;
- informing the public on opportunities and benefits of close cooperation with the EU;
- promoting enhanced economic, political, and trade cooperation between Ukraine and the European Union;
- informing the international community about the challenges and achievements of Ukraine's reform process under the EU-Ukraine Association Agreement.

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