



Funded by
the European Union

CSO METER

Empowered for Action

UKRAINE 2024

Country Report

Kyiv





**Funded by
the European Union**



European Center for
Not-for-Profit Law



CSO Meter 2024: Ukraine Country Report

Reporting period: January–November 2024

Author: Mariia Krasnenko, ISAR Ednannia expert

ISAR Ednannia is a non-governmental organisation that works to make Ukraine's civil society influential in developing and consolidating democracy. ISAR Ednannia conducts and funds numerous research projects aimed at civil society and its operations, as well as maintains an extensive research database containing the leading researchers and think tanks in Ukraine. ISAR Ednannia is a grantmaking organisation that funds CSOs' projects from all over Ukraine. It promotes the development of intersectoral dialogue and collaboration between government, businesses and civil society to address social challenges and achieve strategic goals.

European Center for Not-for-Profit Law Stichting (ECNL) is a leading European resource and research centre in the field of policies and laws affecting civil society. ECNL creates a knowledge base, empowers partners, and helps set standards that create, protect and expand civic freedoms.

The authors would like to express their sincere gratitude to all contributors, including the CSO Hub Members (Ukrainian Center for Independent Political Research, Centre for Democracy and Rule of Law, ZMINA Human Rights Centre and Institute of Legislative Ideas), Advisory Board members and members of the Civil Society Sectoral Support Activity (Maksym Latsyba, Maksym Lukiniuk, Anna Isichko, Dmytro Yaprakh, Volodymyr Yavorsky and Iryna Bieliaieva).

The *CSO Meter: Empowered for Action* project is implemented by ECNL and its partners: Transparency International Anticorruption Center in Armenia; Civil Society Institute in Georgia; Promo-LEX Association in Moldova; and ISAR Ednannia in Ukraine.

This publication was produced with the financial support of the European Union. Its contents are the sole responsibility of the authors and do not necessarily reflect the views of the European Union.

Copyright © 2025 by ECNL Stichting and ISAR Ednannia. All rights reserved.

TABLE OF

CONTENTS

ABBREVIATIONS & ACRONYMS	5
I. EXECUTIVE SUMMARY	6
II. UKRAINE – IN NUMBERS	11
III. FINDINGS	12
3.1 FREEDOM OF ASSOCIATION	12
3.2 EQUAL TREATMENT	19
3.3 ACCESS TO FUNDING	22
3.4 FREEDOM OF PEACEFUL ASSEMBLY	25
3.5 RIGHT TO PARTICIPATION IN DECISION-MAKING	29
3.6 FREEDOM OF EXPRESSION	37
3.7 RIGHT TO PRIVACY	41
3.8 STATE DUTY TO PROTECT	45
3.9 STATE SUPPORT	49
3.10 STATE-CSO COOPERATION	57
3.11 DIGITAL RIGHTS	60
IV. KEY PRIORITIES	65
V. METHODOLOGY	67
VI. REFERENCES	69

ABBREVIATIONS & ACRONYMS

AI	Artificial intelligence
AML/CTF	Anti-money laundering/counter-terrorism financing
CEDEM	Centre for Democracy and Rule of Law
CMU	Cabinet of Ministers of Ukraine (<i>Kabinet Ministriv Ukrainy</i>)
CSO	Civil society organisation
DDoS	Distributed denial-of-service
EaP	Eastern Partnership
EBA	European Banking Authority
ECNL	European Center for Not-for-Profit Law Stichting
EU	European Union
EU GDPR	General Data Protection Regulation (Regulation EU 2016/679)
EUR	Euro
FATF	Financial Action Task Force
GDP	Gross domestic product
IDP	Internally displaced person
LGBTQ+	Lesbian, Gay, Bisexual, Transgender, Queer or Questioning, Intersex, Asexual, Ally, etc.
MP	Member (People's Deputy) of the Parliament of Ukraine
NBU	National Bank of Ukraine (<i>Natsionalnyi bank Ukrainy</i>)
NGO	Non-governmental organisation
Parliament of Ukraine	Supreme Council of Ukraine (<i>Verkhovna Rada Ukrayiny</i>)
Register	Register of Non-Profit Institutions and Organisations (<i>Reyestru neprybutkovykh ustanov ta orhanizatsiy</i>)
SBU	Security Service of Ukraine (<i>Sluzhba bezpeky Ukrainy</i>)
UAH	Ukrainian Hryvnia
UBO	Ultimate beneficial owner
USD	United States Dollar
VAT	Value Added Tax

I. EXECUTIVE SUMMARY

Country context and important trends relevant to the civil society environment

The conditions of the Russian Federation's ongoing armed aggression against Ukraine have led to, among other things, the displacement of a significant number of civil society organisations (CSOs)¹ from the territories where hostilities are (or were) conducted or temporarily occupied by the Russian Federation, threats to the lives and health of activists and their families in the temporarily occupied territories, and disinformation and other types of cyber-attacks.

CSOs are implicated in the general context of the conditions of war: a large number of representatives of CSOs have joined (or are planning to join) the Defence Forces of Ukraine, including through a broad mobilisation campaign in 2024. Some CSOs have restructured their work to focus on emergency response (for example, humanitarian assistance and shelter) and this has resulted in limited activities being undertaken in their primary areas of operation, such as education and civil activism. Overall, the involvement of CSOs in humanitarian response and, at the same time, in reconstruction measures is increasing against the backdrop of the war.

In 2024, Ukraine has advanced in its negotiations to become a member of the European Union (EU) and this has led to significant support for CSOs and possibilities for their involvement in the decision-making process. However, Ukraine continues to face unresolved issues in various areas, including in defence, countering corruption, protecting cultural heritage, addressing ecological concerns, and implementing reforms (such as in the judiciary, decentralisation, and social security). This situation requires CSOs to address these long-term challenges alongside the urgent issues arising as a direct consequence of the war, which include:

- Ensuring (financial) sustainability for the important work of CSOs. The main source of funding for CSOs continues to be international support which is

¹ Includes public associations, charitable organisations and public unions. Meaning of 'civil organisation' according to the Law of Ukraine on Public Associations, No. 4572-VI, 22.03.2012 last amended 14.07.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4572-17#Text>; meaning of 'charitable organisation' according to the Law of Ukraine on Charitable Activities and Charitable Organisations, No. 5073-VI, 05.07.2012 last amended 08.11.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/5073-17#Text>.

not always able to respond quickly to the changing context and conditions. CSOs in Ukraine are having to work harder to operate compared to in normal conditions due to the general levels of fatigue, lack of staff, energy supply issues and security risks;

- Ensuring that there are sufficient specialists to work in CSOs. The war has led to many CSO workers being forced to relocate abroad, or to transition to different workplaces, including to international organisations that can offer better support and resources. Some CSO activists and representatives have lost their lives as a result of the Russian Federation's armed aggression, including while as military personnel, as a result of being taken hostage, or as civilians. Additionally, Ukrainian legislation remains unclear regarding the possibility of CSO representatives being exempted during the mobilisation process; and
- Ensuring sufficient consistency and coordination in CSOs' interactions with the authorities. In some cases, the authorities have become more secretive in the way they operate. Although this approach can often be justified under the conditions of martial law, it does complicate the authorities' relationship with civil society and narrows the possibilities for mutual cooperation.

In 2024, there were changes in the government. Powers were redistributed between the deputy prime ministers (for example, the position of Deputy Prime Minister for European and Euro-Atlantic integration was combined with the position of Minister of Justice, and the position of Deputy Prime for reintegration of temporarily occupied territories was terminated), new powers of ministries were determined (for example, the Ministry of Culture and Information Policy of Ukraine was renamed the Ministry of Culture and Strategic Communications of Ukraine), and new ministers were appointed (for example, the Minister of Foreign Affairs and Minister of Veterans Affairs). These changes can potentially affect the participation of CSOs in the process of development and decision-making.

Key developments and priorities in the civil society environment

The overall country score for the CSO environment in Ukraine in 2024 is unchanged from 2023 (4.7 out of 7). The average country scores for Legislation (5.1) and Practice (4.3) also remain the same as in 2023. Despite changes occurring in some of the monitored standards, the developments are not significant enough to lead to a change

in score for the overall environment in the country, largely as a result of the impact of the war.

As a result of the adoption of the Law on Ensuring Transparency of Local Self-Government and the Law on Public Consultations and the expected adoption of the Law on Local Self-Government in Ukraine and People's Power at the Level of Local Self-Government, the score for Legislation in Area 5 (*Right to Participation in Decision-Making*) increased from 5.1 in 2023 to 5.2 in 2024. This led to an increase in the overall score for Area 5 from 4.7 in 2023 to 4.8 in 2024. However, the overall scores, as well as the scores for Legislation and Practice, in the remaining ten areas remain the same as in 2023.

The three areas with the highest scores remain the same as in 2023: Freedom of Association (5.6), Equal Treatment (5.3), and State-CSO Cooperation (5.3). The three areas with the lowest scores also remain the same as in 2023: State Duty to Protect (3.7), Right to Privacy (4.1), and State Support (4.4).

Key developments

- Members of Parliament (MPs) addressed the main concerns of civil society regarding the proposed Law on Lobbying. As a result, under the new Law that was adopted in February 2024, CSOs are not considered lobbyists 'unless such activities relate to commercial interests'. This wording may still give rise to law enforcement risks in the future and will require close monitoring and further discussion. In 2024, further discussion of changes to the Law aimed at restricting CSOs was observed even before it entered into force. This requires further attention from CSOs;
- The Parliament of Ukraine adopted the Law on Ensuring Transparency of Local Self-Government and the Law on Public Consultations. The Law on Local Self-Government in Ukraine and People's Power at the Level of Local Self-Government is awaiting the President's signature at the time of writing. These Laws will support civil society involvement in decision-making, regulate the procedure for using local democracy tools, and also determine the obligation to conduct public consultations. At the same time, however, experts raise several concerns (for instance, the exclusion of requirements regarding the duty of MPs to hold public consultations and the implementation of the measures provided for in the Laws commencing only twelve months after the end of martial law);
- The government continued to implement the National Strategy for Promoting Civil Society Development in Ukraine and started work on the Action Plan for its implementation in the next period. The report of completion of the Action Plan in 2024 was not available at the time of writing. CSOs, together with the Secretariat of the Cabinet of Ministers of Ukraine (CMU), are preparing a new

document according to the agreed work plan which provides for various communication formats (strategy, online forms);

- The government is taking steps to improve the environment for engaging volunteers. The state, together with CSOs, is preparing the Concept of the State Programme for the Development of Volunteer Activities in Ukraine for the period 2025-2030. A number of legislative initiatives aimed at supporting volunteering will continue to be reviewed in the Parliament of Ukraine. However, this sector needs further targeted work in the direction of solutions to support volunteering, including via legal guarantees, in conditions where the number of volunteers is among the highest in the world; and
- Banks continue their restrictions on cross-border financial transactions and financial monitoring measures. Particularly in the context of the armed aggression by the Russian Federation and the need for financial institutions to deal with terrorism financing, the issue of anti-money laundering/counter-terrorism financing (AML/CTF) measures has become increasingly important for CSOs' operations in Ukraine. CSOs have noted that the government has provided insufficient information regarding AML/CTF measures, how they apply to the CSO sector and the risks they hold in preventing legitimate work. CSOs (as well as Ukrainian businesses) have faced difficulties in conducting cross-border operations (for instance, not being able to receive a payment, or difficulties with proving payments and their goals).

Key priorities

Out of the 10 key priority recommendations outlined in the CSO Meter 2023 report for Ukraine, eight of these have been either completed or partially addressed. Notable progress has been made in avoiding legislation that restricts the work of CSOs, as well as in advancing laws that ensure public consultations and the continued implementation of the National Strategy for Promoting Civil Society Development. CSOs have also been involved in the post-war recovery process and there has been progress in expanding the range of organisations eligible to receive state funds on a competitive basis. Furthermore, steps have been taken to reduce banking risks for CSOs and investigations into attacks on journalists and public activists, including those committed by the Russian Federation, have continued.

Despite these positive developments, several challenges persist from 2023. Issues remain concerning registration services for CSOs, CSOs' participation in decision-making, and access to state support, particularly in areas such as procurement and banking services. Additionally, there are ongoing concerns about the protection of activists and civil society from crimes perpetrated by the Russian Federation.

For 2024, new key priorities have been added in relation to effective public participation and supporting measures for volunteerism. As a result, to improve the CSO environment in the coming period, the government and the relevant institutions, together with CSOs and all other affected stakeholders, should prioritise the following seven recommendations from a total number of 41 recommendations across the 11 CSO Meter areas:

1. The CMU, the Ministry of Digital Transformation, and the Ministry of Justice should ensure that CSO registration services are provided through the online 'Diia' portal, similar to those provided to businesses;
2. The Parliament of Ukraine should review the provisions of the Law on Public Consultations stating that it will not enter into force until one year after the end of martial law and define the obligation of MPs to hold public consultations;
3. The CMU and other central executive bodies should ensure the continued participation of CSOs in the development of programme documents, including those aimed at integrating Ukraine into the EU. Particular attention should be given to involving CSOs whose main activities are conducted at the local level, as well as those that have been displaced from temporarily occupied territories;
4. The CMU, through its authorised bodies, should ensure that public procurement procedures involving CSOs are taken into account and that CSOs are widely informed about their access to public procurement;
5. The National Bank of Ukraine (NBU) should facilitate CSOs' access to banking services on an equal footing with businesses, including cross-border transactions and lending. It should also ensure communication with international financial institutions, including the Financial Action Task Force (FATF), and foreign banks to mitigate restrictions caused by armed aggression;
6. Law enforcement, including the Prosecutor General's Office, should continue investigating and documenting Russian crimes against CSO representatives and the media to hold Russia accountable; and
7. The Parliament of Ukraine should adopt the Draft Law on Amendments to the Tax Code on the Support of Volunteer Activities in Martial Law No. 10040 dated 13 September 2023.

II. UKRAINE – IN NUMBERS

Population: No data for 2024² | **GDP per capita:** USD 5,500 (2024)³ | **Number of CSOs:** 135,117⁴ (2024) | **CSOs per 10,000 inhabitants:** Cannot be determined⁵ | **Registration fee for CSOs:** None | **Freedom in the World:** Partly Free (49/100) (2024)⁶ | **World Press Freedom Index:** 61st out of 180 countries, score 65 (2024)⁷



Country score: 4.7

Legislation: 5.1

Practice: 4.3

The scores range from 1 to 7, where 1 signifies the lowest possible score (extremely unfavourable – authoritarian - environment) and 7 signifies the highest possible score (extremely favourable environment).

Areas	Overall	Legislation	Practice
Freedom of Association	5.6	5.6	5.5
Equal Treatment	5.3	5.4	5.1
Access to Funding	4.7	5.0	4.4
Freedom of Peaceful Assembly	4.7	4.9	4.5
Right to Participation in Decision-Making	↑ 4.8	↑ 5.2	4.3
Freedom of Expression	4.9	5.5	4.2
Right to Privacy	4.1	4.9	3.2
State Duty to Protect	3.7	4.0	3.4
State Support	4.4	4.7	4.0
State-CSO Cooperation	5.3	5.7	4.8
Digital Rights	4.8	5.1	4.4

The arrows indicate improvement or deterioration compared to last year's scores.

² There is currently no relevant statistical information available as a result of the large-scale displacement caused by the armed aggression of the Russian Federation against Ukraine, the temporary occupation of territories, deaths and the forced deportation of Ukrainian citizens. Given these factors, any population estimates would lack the necessary precision and reliability to be considered valid.

³ International Monetary Fund, 'GDP per capita',

<https://www.imf.org/external/datamapper/NGDPDPC@WEO/UKR?zoom=UKR&highlight=UKR>.

⁴ According to the State Statistics Service of Ukraine. The total number includes public organisations, public unions and charitable organisations.

⁵ Relevant statistical information is not available due to the lack of data on the population of Ukraine as a result of the armed aggression of the Russian Federation against Ukraine.

⁶ Freedom House, 'Freedom in the World 2024', <https://freedomhouse.org/country/ukraine/freedom-world/2024>.

⁷ Reporters Without Borders, '2024 World Press Freedom Index', <https://rsf.org/en/country/ukraine>.

III. FINDINGS

3.1 Freedom of Association

Overall score per area: **5.6 / 7**

Legislation: **5.6 / 7**

Practice: **5.5 / 7**

Freedom of association continues to be guaranteed by law and provided in a favourable and stable manner in practice for CSOs. CSOs in Ukraine are free to determine their goals and activities. State registration of CSOs is free of charge and the procedure is clearly defined and efficient. However, the procedure is still not accessible through the online 'Diia' portal. Civil society raised concerns about certain legal initiatives that aimed to restrict CSOs in their representation abroad (particularly when relevant to the state or its interests). These initiatives were later withdrawn. In 2024, freedom of association for CSOs remains under pressure due to AML/CTF-related measures that require the registration of the CSO's ultimate beneficial owner (UBO). Efforts are still being made by CSOs to ensure a unified understanding of the definition of UBO in the CSO context.

The overall score for the area of Freedom of Association, as well as the scores for Legislation and Practice, have remained the same as in the previous reporting period. The recommendations provided in this area in the previous reporting period were partially implemented: communication between CSOs and the state is ongoing and the adoption of legislation restricting the activities of CSOs has been avoided. The recommendation to adopt the Draft Law on Regulation of the Activities and State Registration of Public Associations remains relevant.

Standard I. Everyone can freely establish, join, or participate in a CSO.

The Constitution of Ukraine⁸ guarantees freedom of association to all citizens of Ukraine. The main forms of CSO in Ukraine are public organisations and charitable foundations. The activities of public organisations in Ukraine are regulated by the Law on Public Associations.⁹ The activities of charitable foundations and charitable societies are regulated by the Law on Charity and Charitable Organisations.¹⁰ Other forms also exist, such as public unions, and charitable societies, which are similarly regulated by the aforementioned Laws.

⁸ Article 36, Constitution of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/254k/96-bp#Text>.

⁹ Law of Ukraine on Public Associations, No. 4572-VI, 22.03.2012 last amended 27.04.2021 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4572-17#Text>.

¹⁰ Law of Ukraine on Charitable Activities and Charitable Organisations, No. 5073-VI, 05.07.2012 last amended 02.06.2021 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/5073-17#Text>.

Citizens of Ukraine, foreigners and stateless individuals who are legally residing in Ukraine and have reached the age of 18 may be founders of public organisations. The founders of youth and children's public organisations may be individuals who are at least 14 years old (for public organisations) or legal entities of private law, including public associations with the status of a legal entity (for public unions). Charitable organisations can be founded by individuals who are at least 14 years old and legal entities of private law. Public organisations can carry out their activities with or without the status of a legal entity. Charitable organisations can only be registered as and act as a legal entity.

There are no territorial restrictions on a CSO's activities and the law provides for the right of CSOs to independently determine the territory of their activities. The Constitution also guarantees individuals and legal entities the right to freely join and participate in the activities of any CSO by becoming members, volunteers, or supporters of CSO initiatives. There are no practical restrictions on the creation of CSOs, or on membership or participation in them.

Standard II. The procedure to register a CSO as a legal entity is clear, simple, quick, and inexpensive.

The procedure for registering CSOs is quick and inexpensive. It is directly regulated by the Law on State Registration of Legal Entities, Individual Entrepreneurs and Public Associations.¹¹ The Law sets out the conditions for CSO registration, including the list of documents required. During the state registration process, an application for a CSO's inclusion in the Register of Non-Profit Institutions and Organisations¹² (Register) can be submitted (the Register includes data on organisations that are not taxpayers of VAT). This depends on the provision of such services by registrars, however.

The principle of extraterritoriality (the possibility for citizens and legal entities to receive state services in any region regardless of their registration place, even if such services are usually available only at the place of registration) does not apply to the full extent. CSOs are not informed about their inclusion or rejection in the Register because the various state registers do not interact with one another and data exchange is complicated by data security measures in wartime conditions. State registration of charitable organisations is carried out according to the organisation's location. It is possible to submit registration documents by post. However, there is no simpler or faster method available for CSO registration. Specifically, CSO registration through the online 'Diia' portal is not possible.¹³ CSOs face difficulties with the lack of specialists (for example, registrars and lawyers) in the registration authorities and from

¹¹ Law of Ukraine on State Registration of Legal Entities, Individual Entrepreneurs and Public Association, No. 755-IV, 15.05.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/755-15#Text>.

¹² Resolution of the CMU on Approval of the Procedure for Maintaining the Register of Non-Profit Institutions and Organisations, Inclusion of Non-Profit Enterprises, Institutions and Organisations in the Register and Exclusion from the Register, No. 440, 13.07.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/440-2016-n#Text>.

¹³ *Diia.gov.ua*: Government services online (in Ukrainian), <https://diia.gov.ua>.

regular power outages which affect access to the internet and documentation for registration throughout Ukraine as a result of Russian shelling of Ukrainian infrastructure.

The procedure for state registration of a public organisation takes three working days and is free of charge. State registration of a charitable organisation takes place within twenty-four hours of receipt of the application (excluding weekends and public holidays) and is free of charge. The review period may be extended for both, but not by more than 15 working days. In practice, the registration bodies occasionally use this possibility to extend the deadline.¹⁴ The Law on State Registration of Legal Entities, Individual Entrepreneurs and Public Associations does not define clear grounds for such extensions (which were established until 2022), limiting itself to the wording: ‘the term may be extended by the subject of state registration if necessary.’ Additionally, there is no provision for shorter registration periods for CSOs, even for an additional fee.

The Law on State Registration of Legal Entities, Individual Entrepreneurs and Public Associations clearly defines the requirements for registration, including the necessary documents and deadlines. The Law provides an exhaustive list of grounds for refusal of state registration. These include where the documents submitted are incomplete, or the fact of sanctions has been established. In practice, the most common reasons for rejection reported by those seeking to register CSOs are: incorrectly writing the name of the organisation in a foreign language; the absence of certain mandatory provisions in the organisation’s charter, incorrectly filling in the application form; using the wrong application form; and submission of an incomplete set of documents.¹⁵ There are cases in which registration bodies have refused registration due to minor deficiencies.¹⁶ Judicial appeal remains the only available tool for appeal by CSOs. There were no such appeal decisions reported in 2024.¹⁷

Although it was approved on its first reading in January 2023, the government’s Draft Law on the Regulation of the Activities and State Registration of Public Associations,¹⁸ which provides for a number of improvements for CSOs (such as increasing the number of CSO registration bodies; reducing the number of required documents; and reducing registration deadlines from three business days to 24 hours), remains stalled.

¹⁴ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

¹⁵ Ibid.

¹⁶ Ibid.

¹⁷ According to data from the Unified State Register of Court Decisions (in Ukrainian), <https://reyestr.court.gov.ua>.

¹⁸ Draft Law on Amendments to Certain Laws of Ukraine on the Regulation of Activities and State Registration of Public Organisations, No. 8084, 28.09.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/40561>.

Standard III. CSOs are free to determine their objectives and activities and operate both within and outside the country in which they were established.

The Law on Public Associations¹⁹ prohibits the establishment and operation of public associations whose goal(s) or actions are aimed at the elimination of Ukraine's independence, changing the constitutional order by force, violation of the sovereignty and territorial integrity of the state or undermining its security, the unlawful takeover of state power, or the propaganda of war or violence. Public associations carry out their activities in accordance with the principle of self-governance, which provides for the right of members (participants) to independently manage their activities in accordance with the organisation's goal(s) and determine their areas of activity. During the period of martial law and the state of emergency, public associations are entitled to provide assistance to the Armed Forces of Ukraine and the affected population, even if these areas are not specified in their charters.²⁰ The goals of charitable foundations are defined as the provision of assistance to promote the legitimate interests of beneficiaries in the 'spheres of charitable activity', as well as the development and support of these spheres in the public interest. There are a total of 15 spheres, including education, healthcare, ecology, environmental protection and animal rights.²¹ Therefore, charitable foundations are more limited in defining their goals and scope of activities compared to public associations.

In practice, there are no obstacles that prevent CSOs from participating in all legally allowed areas of activity. In 2024, MPs initiated two legislative initiatives (No. 11103²² and No. 11104)²³ on the need to legislate the specifics of the activities of 'special missions' of Ukraine (formed by decision of either the Chairman of the Parliament of Ukraine, the President or the Prime Minister for specific purposes) and to identify members, establish conditions and procedures for their activities, as well as to regulate issues related to foreign business trips of representatives of Ukraine to represent the state at certain events. CSOs were concerned that, with such initiatives, the state would indirectly subject them to pressure if their activities are in some way 'inconvenient' or critical of the authorities. The legal initiatives provided for criminal liability (punishment in the form of deprivation of liberty for a term of ten to twelve years with deprivation of the right to hold certain positions or engage in certain activities) for the leaders of CSOs, individual activists, or volunteers, which carried the risk that they would not have been able to implement their activities.²⁴ Under public pressure, the draft laws were withdrawn.

¹⁹ Article 4, Law of Ukraine on Public Associations, *op. cit.*

²⁰ Paragraph 63, subsection 4 of Section XX of the Tax Code of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2755-17#n12538>.

²¹ Article 3, Law of Ukraine on Charitable Activities and Charitable Organisations, *op. cit.*

²² Draft Law on Special Missions of Ukraine, No. 11103, 20.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43873>.

²³ Draft Law on Amendments to the Criminal Code of Ukraine to Establish Liability for Misappropriation of State Functions, No. 11104, 20.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43874>.

²⁴ Ukrainian Helsinki Human Rights Union, 'Life sentence for contact with representatives of other countries: new draft laws registered in the Parliament', 26 March 2024 (in Ukrainian),

Standard IV. Any sanctions imposed are clear and consistent with the principle of proportionality and are the least intrusive means to achieve the desired objective.

CSOs may be dissolved by a court, but this rarely happens in practice. The sanctions for nonprofit CSOs are clearly defined (in the Tax Code, provision 133.4), but can be applied without warning. Despite the obligation to send notices of exclusion from the Register, in practice, CSOs do not receive any warnings about the decisions made. However, CSOs can reapply to be included in the Register. Violations of the provisions on reporting forms and procedures established for all legal entities do not entail specific sanctions for CSOs. This means that liability for violations of the law, including within the framework of requirements for different types of reporting, is standardised.

Legal entities, including CSOs, continue to be required to provide information on their UBOs due to AML/CTF measures. The fine for failure to provide such information ranges from UAH 17,000 (approx. 387 EUR) to UAH 51,000 (approx. 1,161 EUR). A guide developed by the Centre for Democracy and Rule of Law (CEDEM) in partnership with the Ministry of Justice provides clarifications²⁵ aimed at ensuring a unified approach to understanding the definition of UBO, including notification of its absence.

According to current legislation, the termination of a CSO's activities is carried out either by its own decision (adopted by the supreme governing body through self-dissolution or reorganisation) or by a court decision on prohibition (forced dissolution). In connection with martial law in Ukraine, the Law on Public Associations contains provisions on the liquidation of a public association in cases of detection of signs that its activities are aimed at eliminating Ukraine's independence, changing the constitutional order by force, violating the sovereignty and territorial integrity of the state, or undermining its security. Liquidation based on such violations is initiated through the law enforcement agencies. The Law on Charity and Charitable Organisations specifies that the legal basis for issuing a court decision on the termination of a charitable organisation at the request of the state registrar (a specially authorised body for state registration) is an authorised person of a charitable organisation being convicted for committing a criminal offence against the foundations of the national security of Ukraine.²⁶ In practice, dissolution by court order is extremely rare. For example, in 2024, only three public organisations were dissolved by court decisions: the 'Army of Faithful

<https://www.helsinki.org.ua/articles/dovichne-za-kontakt-z-predstavnykamy-inshykh-krajin-u-parlamenti-zareiestruvaly-novyiy-zakonoproiekt/>.

²⁵ Ministry of Justice of Ukraine and CEDEM, 'Determining the ultimate beneficial owner by public associations and charitable organisations', 15 April 2024 (in Ukrainian), <https://minjust.gov.ua/news/ministry/viznachennya-kintsevogo-benefitsiarnogo-vlasnika-gromadskimi-obednannyami-ta-blagodiyynimi-organizatsiyami>.

²⁶ Law of Ukraine on the introduction of changes to some legislative acts of Ukraine regarding ensuring the liability of persons who carried out collaborative activities, No. 2107-IX, 03.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2107-20#top>.

Black Sea Cossacks named after Hetman Bohdan Khmelnytskyi',²⁷ 'Soborne Kozatstvo',²⁸ and 'Border Cossack Guard'.²⁹ The court justified its decision in each case by the identification by the Security Service of Ukraine (SBU) of a real threat to the national interests, national security, sovereignty and territorial integrity of Ukraine from certain pro-Russian public associations bearing signs of anti-Ukrainian activity.

Standard V. The state does not interfere in the internal affairs and operation of CSOs.

The state does not create unnecessary obstacles for the activities of CSOs. Generally, there are clear rules on the scope and criteria for monitoring and inspection of CSOs by the state. The procedures and requirements for CSOs' reporting are well defined and reporting can be carried out online.

CSOs are obliged to keep accounting, financial and statistical reports, to be registered with the tax authorities. Public organisations that receive financial support from the state budget of Ukraine and from local authority budgets are required to submit and publish reports on the intended use of these funds. CSOs may also prepare a simplified set of financial statements, including a balance sheet (statement of financial position) and a profit and loss statement. The submission of statistical information by CSOs with the status of non-profit organisation is carried out by submitting a financial report which consists of a balance sheet (income and profit). Detailed statistical information (number of registered members, number of mass events held, number of projects implemented, number of publications, labour costs, income from non-residents, etc.) on CSO activities is not required.³⁰ Experts note³¹ that during 2024, under martial law, some CSOs have not submitted statistical information and some state bodies that collect such information have informed CSOs that they are not required to submit this data due to it being of low interest as it primarily relates to the disposal of non-state funds.

²⁷ Decision of the Odesa District Administrative Court, 16 January 2024, Case No. 420/29395/23 (in Ukrainian), <https://reyestr.court.gov.ua/Review/116362071>.

²⁸ Decision of the Kyiv District Administrative Court, 31 May 2024, Case No. 320/6166/24 (in Ukrainian), <https://reyestr.court.gov.ua/Review/119426187>.

²⁹ Decision of the Odesa District Administrative Court, 2 August 2024, Case No. 420/450/24 (in Ukrainian), <https://reyestr.court.gov.ua/Review/120781587>.

³⁰ Order of the State Statistics Service of Ukraine on recognition as having lost validity, the order of the State Statistics Service of 23 November 2016, No. 221 on approval of the form of state statistical observation No. 1 - public organisation (annual) report on the activities of a public organisation', No. 459, 31.12.2019 (in Ukrainian), <https://zakon.rada.gov.ua/rada/show/v0459832-19>.

³¹ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

The state does not categorise CSO activities as high risk and requiring frequent inspections. Where these do occur, the relevant authorities generally conduct inspections of CSOs in a reasonable, proportionate and objective manner. However, some CSOs, particularly newly-established ones, require additional support to meet their reporting requirements. This is often due to a lack of relevant specialists (for example, lawyers and accountants) on their staff, which can be attributed to limited funding and a general shortage of specialists in the community.

Recommendations:

- The Parliament of Ukraine should adopt the Draft Law on the Regulation of the Activities and State Registration of Public Associations;
- The Ministry of Digital Transformation, together with the Ministry of Justice, should introduce registration and amendment services for CSOs on the online 'Diia' portal;
- The CMU, together with the NBU, should ensure further consultations with CSOs that do not have a UBO on their exclusion from the list of CSOs required to provide information on their UBO; and
- The Parliament of Ukraine, as well as other legislative bodies, should avoid the registration and consideration of draft laws that may expose CSOs and their representatives to pressure from the state.

3.2 Equal Treatment

Overall score per area: **5.3 / 7**

Legislation: **5.4 / 7**

Practice: **5.1 / 7**

According to the Law on State Registration of Legal Entities, Individual Entrepreneurs and Public Associations, businesses and CSOs are treated equally. The state's treatment of all CSOs is also generally equal. However, in practice, businesses enjoy more favourable conditions when it comes to issues such as registration (in terms of timeframes and online capabilities), public procurement, and access to banking services. CSOs that have relocated due to the armed aggression of the Russian Federation continue to require special support which is already provided to relocated businesses.

The overall score for the area of Equal Treatment, as well as the scores for Legislation and Practice, remain the same as in 2023. As in the previous reporting period, the recommendations to provide registration services for CSOs through the online 'Diia' portal and to ensure public procurement procedures and access to banking services for CSOs on an equal footing with businesses, remain relevant.

Standard I. The state treats all CSOs equitably with business entities.

According to the Law on State Registration of Legal Entities, Individual Entrepreneurs and Public Associations, the procedures for registration and termination of a CSO are free of charge, as they also are for business entities.³² However, the timeframe is longer for CSOs.³³ CSOs do not have the possibility to submit documents to register electronically through the online 'Diia' portal. In practice, the registration authorities do not impose additional requirements or other obstacles for the registration, operation or liquidation of CSOs compared to business entities.

The Law on Public Procurement³⁴ does not establish any exceptions or special conditions for CSOs. Despite the fact that the state does not deny or impede CSOs' access to procurement procedures at the regulatory level, this process remains difficult for most CSOs. CSOs face difficulties in complying with all the necessary requirements and procedures. These include the need to appoint a responsible (authorised) individual to organise and conduct the procurement procedure, the need to establish a tender committee, and confirmation of the level of knowledge

³² Diia.gov.ua, 'Registration of a public association' (in Ukrainian), <https://guide.diia.gov.ua/view/derzhavna-reiestratsiia-stvorennia-hromadskoho-obiednannia-df01c1fb-038f-4277-837d-81d6931bf8f3>.

³³ Diia.gov.ua, 'Changes to information about a legal entity contained in the Unified State Register, including changes to the constituent documents of a legal entity (except for a public formation)' (in Ukrainian), <https://guide.diia.gov.ua/view/derzhavna-reiestratsiia-zmin-do-vidomostei-pro-iurydychnu-osobu-krim-hromadskoho-formuvannia-ta-relihiinoi-orhanizatsii-shcho-m-7472d45b-ee89-4885-a2ec-af9e5290b4dc>.

³⁴ Law of Ukraine on Public Procurement, No. 922-VIII, 25.12.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/922-19#Text>.

in the field of public procurement. This is mainly due to the lack of necessary staff, skills, and, most importantly, public procurement not being a priority for CSOs as a method of fundraising.

Legal regulation of access to funding, including from/to abroad, is generally less favourable for CSOs than for business entities. However, unlike businesses, CSOs are subject to a lower level of financial risk monitoring and are less likely to face AML/CTF measures.³⁵ In turn, CSOs, as well as businesses, are faced with the difficulties of conducting cross-border operations due to the fact of Ukraine facing armed aggression from the Russian Federation being assessed as a terrorism financing risk, which is not the case.

CSOs that have relocated from territories where hostilities are being (or have been) conducted or that are temporarily occupied by the Russian Federation do not have the same level of support as is provided to businesses. At the government level, the functioning of the 'Platform for business relocation to safer regions'³⁶ is ensured for businesses. The programme provides support for full or partial relocation of capacities of private enterprises that have suffered as a result of armed aggression. Support is understood as the selection of a location for facilities, as well as assistance with transportation to a new location, assistance in the resettlement of employees and the search for new employees, support in the restoration of logistics, the purchase of raw materials and the search for sales markets. Support measures are also provided for businesses at the local level. An equivalent programme for relocated or relocating CSOs has not been put in place.³⁷ In practice, such support is dependent on CSOs obtaining it by themselves, via communications with local self-government bodies, partner organisations, and donors.

Inspections of and sanctions against CSOs are in general no more frequent than for business entities.

Standard II. The state treats all CSOs equally with regard to their establishment, registration, and activities.

In general, the state treats all CSOs equally in terms of their establishment, registration and activities. In 2024, there have been no known cases of governmental institutions giving preferential treatment to particular organisations over others. There is a practice of trust building and sustainable cooperation with individual CSOs. CSOs that express views and positions critical of public officials or policies are not deliberately restricted in their activities. It is possible that in such cases CSOs are less involved (or not involved) in the process of

³⁵ CEDEM, 'Report on the Sectoral Assessment of NGOs for AML/CTF Risks' (in Ukrainian),

[https://cedem.org.ua/wp-](https://cedem.org.ua/wp-content/uploads/2024/09/Kоротка_версія_на_презентацію_Звіт_про_проведення_секторальної-.pdf)

[content/uploads/2024/09/Kоротка_версія_на_презентацію_Звіт_про_проведення_секторальної-.pdf](https://cedem.org.ua/wp-content/uploads/2024/09/Kоротка_версія_на_презентацію_Звіт_про_проведення_секторальної-.pdf).

³⁶ Prozorro Sale, 'A platform for business relocation to safer regions' (in Ukrainian),

<https://prozorro.sale/marketplace/landing-page/>.

³⁷ Restart Business, 'Business relocation support' (in Ukrainian), <https://restartbusiness.in.ua>.

participation in decision-making. This may be a more critical challenge for CSOs that operate at the local level.³⁸

CSOs established by foreign legal entities or individuals are subject to separate document submission requirements than for CSOs established as Ukrainian entities or by Ukrainian citizens. The same grounds for prohibition³⁹ and termination of activities apply to foreign CSOs operating in Ukraine as for Ukrainian-established CSOs.

Recommendations:

- The CMU, the Ministry of Digital Transformation, and the Ministry of Justice should ensure that CSO registration services are provided through the **online** 'Diia' portal, similar to those provided to businesses;
- The CMU should establish a support programme (in terms of coordination, financial resources, etc.) for CSOs that have relocated to other parts of Ukraine from territories in which hostilities are being (or have been) conducted or that are temporarily occupied by the Russian Federation;
- The CMU, through its authorised bodies, should ensure that public procurement procedures, including the criteria and necessary documentation, can be fulfilled by CSOs and that CSOs are not prevented from participating in public procurement and that they are well informed about their access to it; and
- The NBU should facilitate CSOs' access to banking services on an equal footing with businesses, including cross-border transactions and lending. It should also ensure communication with international financial institutions, including FATF, and foreign banks to mitigate restrictions caused by armed aggression.

³⁸ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

³⁹ Law of Ukraine on Amendments to Certain Legislative Acts of Ukraine Regarding the Regulation of Activities of Separate Subdivisions of a Legal Entity Established in Accordance with the Law of a Foreign State, No. 3257-IX, 14.07.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3257-20#Text>.

3.3 Access to Funding

Overall score per area: **4.7 / 7**

Legislation: **5.0 / 7**

Practice: **4.4 / 7**

Sources of funding for CSOs remain diverse and access to funding is legally guaranteed. One of the major challenges to accessing funding for Ukrainian CSOs continues to be the tight control by banks over CSOs' activities, despite civil society experts advocating for banks and institutions to apply a risk-based approach.

The overall score in this area, as well as the scores for Legislation and Practice, remain unchanged from the previous reporting period. In the current reporting period, the recommendations are aimed at rejecting initiatives that limit CSOs' ability to receive foreign funding, as well as promoting state support for the development of social services and ensuring the participation of CSOs in establishing the priorities for state support.

Standard I. CSOs are free to seek, receive, and use financial and material resources for the pursuit of their objectives.

CSOs in Ukraine are free to request and receive funding or in-kind support from public or private donors. Generally, the requirements for CSOs to receive, use and report on funding or in-kind support are not burdensome. Support from donors and international organisations remains one of the main sources of funding for CSOs.⁴⁰ In 2024, such support continued to be provided in the form of programme grants, service contracts, and humanitarian aid, among others.⁴¹ Ukrainian legislation does not prohibit CSOs from receiving foreign financial support. State funding of CSOs includes receiving funding through grant programmes, support of statutory activities, public procurement, commissioning of social services and via public budgets. For example, in 2024, within the framework of the mental health programme '*How are you?*',⁴² together with the charitable foundation Caritas, resilience centres⁴³ were opened in a number of locations in which social services are provided by a charitable foundation with funds

⁴⁰ U.S. Agency for International Development and U.S. Department of State, Foreign Assistance Dashboard (data last updated on 19.12.2024), <https://foreignassistance.gov>.

⁴¹ Institute of Analytics and Advocacy and ISAR Ednannia, 'Activities of donor and international organisations in Ukraine in 2022-2024' (in Ukrainian), https://api.home.ednannia.ua/upload/kch/24/09/10/Activities_of_donor_and_%20international_%20organisations_%20in_Ukraine.pdf.

⁴² All-Ukrainian Mental Health Programme, «*Ти як?*» ('How are you?') (in Ukrainian), <https://howareu.com>.

⁴³ Ministry of Social Policy of Ukraine, 'Resilience Centres may appear in every community', 25 January 2024, <https://www.kmu.gov.ua/en/news/minsotspolityky-tsentry-zhyttiostiikosti-mozhut-ziavtytsia-u-kozhnii-hromadi>.

from the state budget.⁴⁴ CSOs can also raise funds through (social) entrepreneurship and economic activities (for instance, the sale of their services). Examples include the activities of CSOs such as the clothing brand *Vil'na nytko* ('Loose thread')⁴⁵ and *Moim ridnym*⁴⁶ ('To my relatives'), a social enterprise for the elderly.

Experts have noted⁴⁷ that obtaining funding or support from various sources remains a difficult process for most CSOs. This is due to, among other reasons, CSOs' lack of experience in formulating funding applications and low awareness of donor requirements for CSOs, as well as CSO financing being a low priority for donors (for example, support for CSO projects related to the military issues is not provided).

However, when it comes to CSOs' engagement in economic activities as an important source of funding, the law is supportive and there is a fairly low profit threshold (over UAH 1 million, around 22,763 EUR) over which VAT registration and liability is incurred. According to experts,⁴⁸ reaching such a threshold poses difficulties for some CSOs due to unreasonable additional control measures imposed by state authorities.

Payment transactions by CSOs are carried out in accordance with the Law on Payment Services.⁴⁹ However, in practice, there are restrictions on CSOs' banking operations which, in 2024, continue to hinder their activities. The most common among these restrictions are the onerous requirements for confirmation of transactions and the limits on the size of transactions.⁵⁰ Experts have also noted⁵¹ that banks impose additional requirements on CSOs regarding confirmation of their current personal data for continuing account maintenance. These include the requirement to provide information on the place of registration of the CSO's founders (often, a CSO lacks connection with its founders who themselves may not have any continuing obligations to the CSO) and the requirement to provide copies of decisions made at the CSO's founding meetings.

⁴⁴ Ibid., 'New resilience centres are opening across Ukraine: Ivano-Frankivsk Region is in the lead', 25 July 2024, <https://www.msp.gov.ua/news/23900.html?PrintVersion>.

⁴⁵ Instagram, @vilnanytko, 'Loose thread: reproduce ornaments on embroidered shirts and accessories, teach women to sew and embroider' (in Ukrainian), https://www.instagram.com/vilnanytko?fbclid=IwY2xjawGMMf5leHRuA2FlbQlxMAABHcxiPkooFaaIHvRsQX2Hqu1cuxf-4hq96zMBqH7wi0QITJZvWxxZrPFJhQ_aem_is9WEkf_V6ld7nl21rcTZw.

⁴⁶ Moim ridnym ('To my relatives'): A social enterprise born out of a sense of gratitude. Gratitude to the people who made an invaluable contribution to our upbringing - our grandmothers. <https://moimridnym.com.ua/pro-proiekt>

⁴⁷ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

⁴⁸ Ibid.

⁴⁹ Law of Ukraine on Payment Services, No. 1591-IX, 15.11.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1591-20#Text>

⁵⁰ CEDEM, 'Report on the Sectoral Assessment of NGOs for AML/CTF Risks', *op. cit.*

⁵¹ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

Standard II. There is no distinction in the treatment of financial and material resources from foreign and international sources compared to domestic ones.

In 2024, there are no special restrictions or procedures for CSOs to receive and use foreign and international funding or in-kind support, as well as for donors to provide funding to CSOs. However, CSOs face practical restrictions from banks on the use of foreign sources of funding. Most of the CSO stakeholders interviewed⁵² reported difficulties related to restrictions on cross-border financial transactions and the financial monitoring measures imposed by banks, in particular, the bank's need to confirm the intended use of a foreign payment. There have been instances where banks have recommended using cash transactions instead of cashless transfers, which potentially increases the risk of abuse. At the same time, the surveyed organisations noted increased engagement in the implementation of internal policies (regarding personnel selection, procurement, partner verification, etc.) and compliance with donor requirements to minimise risks in the area of AML/CTF. However, the majority of respondents indicated that there is limited information from the government regarding AML/CTF risks and measures as they relate to the CSO sector.

There are certain specific obstacles (blocking, refusal, etc.) for financial transfers from abroad made to CSOs whose tax addresses are located in regions in which part of the territory is temporarily occupied by the Russian Federation.⁵³ As a result, these CSOs that want to support the Ukrainian population are unable to access the funds to do so.

Foreign and international grants, donations and membership fees are treated the same as domestic ones. CSOs that receive foreign funding are not stigmatised or attacked in the state-supported media or by the government. However, two draft laws (Draft Law No. 3326⁵⁴ and Draft Law No. 3564)⁵⁵ aimed at restricting the activities of organisations receiving foreign support remain pending in 2024.

⁵² CEDEM, 'Report on the conduct of an independent risk assessment of the non-profit sector in Ukraine in the area of prevention and combating the legalisation (laundering) of criminal proceeds, the financing of terrorism and the financing of the proliferation of weapons of mass destruction', September 2023 to August 2024 (in Ukrainian), <https://cedem.org.ua/wp-content/uploads/2024/09/Zvit-z-nezalezhnoyi-otsinky-ryzykiv-CEDEM.pdf>.

⁵³ European Commission, Directorate-General for Financial Stability, Financial Services and Capital Markets Union, 'Frequently asked questions on Donetsk, Kherson, Luhansk and Zaporizhzhia oblasts related matters concerning sanctions adopted following Russia's military aggression against Ukraine', 12 July 2024, https://finance.ec.europa.eu/publications/donetsk-kherson-luhansk-and-zaporizhzhia-oblasts_en.

⁵⁴ Draft Law on Amendments to the Law of Ukraine on the Purification of Power (to prevent external influence on the interests of the state), No. 3326, 13.04. 2020, (in Ukrainian), http://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=68576.

⁵⁵ Draft Law on Amendments to Certain Legislative Acts of Ukraine (regarding transparency of activities of public associations with foreign support), No 3564, 29.05.2020 (in Ukrainian), https://w1.c1.rada.gov.ua/pls/zweb2/webprN%N%oN%c4_1?pf3511=68977.

Recommendations:

- The Parliament of Ukraine should reject draft laws intended to worsen the legal environment for CSOs that receive foreign funding;
- The Ministry of Social Policy should promote state support for the development and commissioning of social services with the involvement of a wide range of stakeholders; and
- The government should ensure the active participation of CSOs in establishing the priorities for state support of CSOs, including long-term programmes, along with subsequent monitoring and assessment.

3.4 Freedom of Peaceful Assembly

Overall score per area: **4.7 /7**

Legislation: **4.9 /7**

Practice: **4.5 /7**

Everyone's right to peaceful assembly is guaranteed by the Constitution of Ukraine. There is still no relevant law regulating the holding of peaceful assemblies, however. Despite the present legal regime of martial law and the threats posed by the war, peaceful assemblies continued to be held throughout 2024. At the local level, the existing difficulties in this area are directly caused by the wartime restrictions.

The overall score for the area of Freedom of Peaceful Assembly, as well as the scores for Legislation and Practice, remain the same as in 2023. In the coming period, recommendations aimed at establishing clear rules for the use of force based on a human rights approach and ensuring freedom of peaceful assembly in practice remain relevant. At the same time, experts and the Advisory Board have agreed not to recommend that a draft law in this area be prepared during the martial law regime.

Standard I. Everyone can freely enjoy the right to freedom of peaceful assembly by organising and participating in assemblies.

Article 39 of the Constitution of Ukraine⁵⁶ defines the right to peaceful assembly. Also, Article 315 of the Civil Code of Ukraine states that individuals have the right to freely assemble at

⁵⁶ Constitution of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>.

peaceful assemblies, conferences, meetings, festivals, etc. There is no separate dedicated law regulating the organisation and holding of peaceful assemblies, however.

Due to the regime of martial law currently in place in Ukraine, the right to freedom of peaceful assembly is not prohibited, but may be restricted by the authorities, including local military administrations.⁵⁷ The organisation and holding of peaceful assemblies in most regions of Ukraine remains possible, but their number is insignificant. Furthermore, it is impossible to hold peaceful assemblies in front of the key institutions in Kyiv such as the Government Building, the Parliament of Ukraine, and the President Building. Due to security concerns, access to the Government Quarter is only possible with a security pass. In 2024, no cases of arbitrary refusals or dispersals of peaceful assemblies were reported. Individuals, groups, or CSOs are neither coerced into nor prohibited from participating in peaceful assemblies and they are not intimidated for planning to organise, participate in, or refrain from participating in such events.

Most often, peaceful assemblies are held in large cities. Every Sunday during 2024, protests have been held in different cities across Ukraine to support and demand government action for the release of prisoners of war by Russia, notably the 'Free Azov' protests that seek to raise awareness of the plight of Azov Assault Brigade fighters who were taken into Russian captivity during the defence of Mariupol.⁵⁸ A series of protests 'Money for the Armed Forces of Ukraine'⁵⁹ were also held.⁶⁰ In Kyiv protesters were seeking that 20 per cent of the Kyiv City State Administration's budget be allocated to the needs of the Armed Forces, including equipment for medical facilities and rehabilitation centers for wounded military personnel. The participants in the actions also drew attention to the need to support Draft Law No. 9560⁶¹ (not adopted in 2024), which allows local budgets to be used for the purchase of property for the Armed Forces of Ukraine. In the cities of Kyiv and Kharkiv, 'KyivPride',⁶² 'KharkivPride'⁶³ and

⁵⁷ Law of Ukraine on the Legal Regime of Martial Law, No. 389-VIII, 12.05.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/389-19#top>.

⁵⁸ Village Ukraine (*Віледж Україна*), 'Free Azov protest organizer: Our protests aren't present-day raves', 26 June 2024, <https://www.village.com.ua/village/city/eng/352155-free-azov-protest-organizer-our-protests-aren-t-present-day-raves>.

⁵⁹ Instagram, @groshi.na.zsu, 'Money for the Armed Forces of Ukraine' (in Ukrainian), <https://www.instagram.com/groshi.na.zsu/>.

⁶⁰ Detector Media, 'Actions of the "Money for the Armed Forces" initiative continue in Kyiv', 9 February 2024 (in Ukrainian), <https://cs.detector.media/community/texts/185880/2024-02-09-u-kyievi-tryvayut-aktsii-initsiatyvy-groshi-na-zsu/>.

⁶¹ Draft Law on Amendments to the Budget Code of Ukraine on Support of Local Self-Governing Bodies to the Security and Defence Sector, No 9560, 04.08.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/42404>.

⁶² Suspilne Media, 'For the first time since the beginning of the full-scale invasion, KyivPride will hold an Equality March and a charity festival', 30 May 2024 (in Ukrainian), <https://suspilne.media/kyiv/757615-vperse-vid-pocatku-povnomasstabnogo-vtorgnenna-u-kievi-provedut-mars-rivnosti-i-blagodijnij-festival/>.

⁶³ ZMINA Human Rights Centre, 'In Kharkiv, Pride Week began with a charity festival. Right-wing radicals picketed the event', 10 September 2024 (in Ukrainian), <https://zmina.info/news/u-harkovi-prajd-tyzhden-rozpochavsya-z-blagodijnogo-festyvalyu-zahid-piketuvaly-pravoradykaly/>.

corresponding counter-protests were held in June and September 2024. Both KyivPride and KharkivPride took place without significant incident.⁶⁴

Standard II. The state facilitates and protects peaceful assemblies.

The right to hold peaceful assemblies is generally clear, simple and free of charge and requires prior notification that is reasonable. In Ukraine, permission to conduct a peaceful assembly is not required. The Constitution of Ukraine envisages only the need for a timely notification on the holding of peaceful gatherings. The general timeframes for early notification are not defined by law. However, they may be defined at the local level⁶⁵ and the specifics determined at the level of a particular region or community in connection with the legal regime of martial law should be taken into account. For example, in the Kirovohrad region⁶⁶ and the Kyiv region,⁶⁷ a notification must be sent at least five working days in advance of the assembly. While the legal regime of martial law implies the risk of disproportionate restrictions on the freedom of peaceful assembly (for instance, on the appeal process, or the timelines to which the authorities must provide replies), the expert community has not reported any negative developments in this respect. There is no legislation that forbids the use of any electronic means of communication to organise peaceful assemblies. There are no restrictions on access to social media as a means of preventing peaceful assemblies, including under martial law.

Standard III. The state does not impose unnecessary burdens on organisers or participants in peaceful assemblies.

Ukrainian legislation does not contain provisions on the responsibility of organisers for maintaining public order or for the actions of others during peaceful assemblies. In turn, however, the legislation still does not clearly define the responsibilities of law enforcement bodies, other state bodies and local self-government bodies in relation to peaceful assemblies. Article 12 of the Law on the National Guard of Ukraine⁶⁸ defines the functions of the National Guard in terms of ensuring public safety and protection of public order during peaceful assemblies. The objectives of the National Police⁶⁹ are generally defined as ensuring public

⁶⁴ Center for Civil Liberties and OZON Public Monitoring, 'KyivPride March 2024: monitoring of the assembly and counter-assembly' (in Ukrainian), <https://ccl.org.ua/wp-content/uploads/2024/06/kyivprajd-marsh-2024-ua.pdf>.

⁶⁵ Constitutional Court of Ukraine, '4.3.7. Right to peaceful assembly' (in Ukrainian), <https://ccu.gov.ua/storinka-knygy/437-pravo-na-myрни-zibrannya>.

⁶⁶ Kirovohrad Regional State Administration, 'On holding mass events and the territory of the region under martial law' (in Ukrainian), <https://www.kr-admin.gov.ua/start.php?q=News1/Ua/2021/08062202.html>.

⁶⁷ Kyiv Regional Military Administration, 'Procedure for holding mass events on the territory of Kyiv region under the legal regime of martial law: Protocol of the Operational Headquarters of the Defence Council of Kyiv Region dated 07.07.2022 No. 145' (in Ukrainian), <https://koda.gov.ua/wp-content/uploads/2022/07/poryadok-provedennya-masovyh-zahodiv-na-terytorii-kyivskoi-oblas.pdf>

⁶⁸ Law of Ukraine on the National Guard of Ukraine, No. 876-VII, 13.03.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/876-18#top>.

⁶⁹ Law of Ukraine on the National Police, No. 580-VIII, 02.07.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/580-19#top>.

security and order, but without specification. Separate instructions are available at the level of individual territorial communities and are mainly related to the specifics of the martial law regime. State authorities do not collect fees for holding peaceful assemblies, nor do they impose disproportionate restrictions on the use of technical equipment during them.

According to Article 34 of the Constitution of Ukraine, everyone has the right to freely collect, store, use, and disseminate information orally, in writing, or in any other way of their choice. This general rule also applies to the dissemination of information about peaceful assemblies. There are no significant obstacles to this dissemination; however, instances of disinformation may occur, primarily related to counter-assemblies and self-censorship.⁷⁰

Standard IV. Law enforcement supports peaceful assemblies and is accountable for the actions of its representatives.

As of 2024, there is no specific document that defines the sequence of actions of law enforcement regarding the use of force during peaceful assemblies. Ensuring freedom of peaceful assembly is a difficult task under the martial law regime. At the same time, Article 12 of the Law on the National Guard of Ukraine refers to the functions of the National Guard to participate in ensuring public safety and the protection of public order during peaceful assemblies. In 2024, the Department of Preventive Activities has continued to operate within the structure of the National Police of Ukraine and its tasks include coordinating the activities of and providing organisational and methodological assistance to Main Police Department in organising the provision of public security and order during peaceful gatherings and education on the holding of peaceful assemblies.⁷¹

Excessive use of force against participants in assemblies has the elements of a crime under Article 365 of the Criminal Code ('abuse of power or official duties by a law enforcement officer').⁷² Criminal legislation also provides for liability for obstructing the organisation or holding of peaceful assemblies under Article 340 of the Criminal Code.

In practice, the units which safeguard a peaceful assembly do not always wear visible means of identification. Experts note⁷³ the need to reduce the presence of military units (for instance, the National Guard of Ukraine, which was involved in policing during 'KyivPride') during peaceful assemblies because security should be provided by officers who have received appropriate human rights-based training.

⁷⁰ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

⁷¹ National Police of Ukraine, 'Department of Preventive Activities' (in Ukrainian), <https://www.npu.gov.ua/pro-policiju/struktura-nacionalnoyi-policiji/departament-preventivnoyi-diyalnosti>.

⁷² Criminal Code of Ukraine, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

⁷³ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

Recommendations:

- The Ministry of Internal Affairs, the National Guard of Ukraine, and the SBU should establish clear rules for the use of force based on a human rights approach. Additionally, these institutions should ensure that, in practice, there are visible means of individual identification for every member of the force during peaceful assemblies; and
- Local authorities, including military administrations, should ensure freedom of peaceful assembly in practice, even during the legal regime of martial law and the current security situation.

3.5 Right to Participation in Decision-Making

Overall score per area: **4.8 /7**

Legislation: **5.2 /7**

Practice: **4.3 /7**

Despite the ongoing Russian armed aggression against Ukraine, CSOs continue to actively participate in the decision-making process. There have been positive trends towards improving the situation in this area and returning to the state prior to the introduction of martial law. The recommendations identified in the previous reporting period were taken into account: the Law on Ensuring Transparency of Local Self-Government, the Law on Public Consultations, and the Law on People's Power at the Level of Local Self-Government were adopted. The Law on Lobbying, adopted in February 2024, does not present any critical risks for CSOs, but its implementation needs to be closely monitored, along with tracking other of legislative initiatives that could introduce unfavourable or restrictive changes for civil society. Practical challenges remain in the area of CSOs' participation in decision-making, including the generally low level of openness of the authorities, as well as the lack of involvement of CSOs at the earliest possible stages.

As a result, the score for Legislation in this area has improved from 5.1 in 2023 to 5.2 in 2024. The overall score has increased to 4.8, compared to 4.7 in the previous reporting period. In the coming period, recommendations aimed at ensuring the participation of CSOs in the decision-making process, as well as providing responses to requests and appeals, remain relevant. Additionally, the state should adopt Draft Law No. 6319, which regulates self-organisation bodies of the population,⁷⁴ and monitoring of the implementation of the Law of on Lobbying remains necessary.

⁷⁴ A 'body of self-organisation of the population' in Ukraine refers to a grassroots community group in which citizens actively organise themselves to address local issues and concerns, often without direct government intervention, promoting a sense of civic participation and local democracy.

Standard I. Everyone has the right to participate in decision-making.

The Constitution of Ukraine guarantees comprehensive and meaningful participation of citizens in decision-making. Some aspects of participation are defined in the Law on the Principles of State Regulatory Policy in the Area of Economic Activity,⁷⁵ the CMU Resolution on Ensuring Public Participation in the Formation and Implementation of State Policy⁷⁶ and the CMU Resolution on Approval of the Procedure for Facilitating Public Expertise of the Activities of Executive Authorities.⁷⁷ Public consultations remain optional for legislation, policy documents and processes that affect the general public or specific sectors and groups.

In May 2024, the Law on Ensuring Transparency of Local Self-Government⁷⁸ came into force, providing for, among other things, the mandatory adoption of local council regulations, the broadcasting of plenary sessions in real time and video recording, and the defining of specifics regarding public information. Local CSOs indicate that these changes may increase levels of trust among local communities and encourage them to become more active in decision-making. However, there are concerns⁷⁹ that implementation of the Law will be a formality and will not ensure meaningful participation. On 9 May 2024, the Parliament of Ukraine also adopted the Law No. 3703-XI (signed by the President in October 2024),⁸⁰ which defines the main forms of participation of the territorial community in solving local issues, as well as details the procedure for their implementation, provides for the mandatory approval of the statutes of territorial communities, and defines internally displaced persons (IDPs) as community residents. However, this Law does not regulate the procedure for the organisation, activity and termination of bodies of self-organisation of the population; the Draft Law submitted by the government that does so (No. 6319)⁸¹ remains without consideration in 2024. The adoption of this Draft Law is necessary in view of the complexity of ensuring the participation of citizens and CSOs in decision-making processes.

⁷⁵ Law of Ukraine on the Principles of State Regulatory Policy in the Area of Economic Activity, No. 1160-IV, 11.09.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/card/1160-15>.

⁷⁶ Resolution of the CMU on Ensuring Public Participation in the Formation and Implementation of State Policy, No. 996, 3 November 2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/996-2010-n#Text>.

⁷⁷ Resolution of the CMU on Approval of the Procedure for Facilitating Public Expertise of Executive Authorities, No. 976, 5 November 2008 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/976-2008-n#Text>.

⁷⁸ Law of Ukraine on Amendments to the Law of Ukraine on Local Self-Government in Ukraine to Ensure Transparency of Local Self-Government, No. 3590-IX, 22.02.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3590-20#Text>.

⁷⁹ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

⁸⁰ Law of Ukraine on Amendments to the Law of Ukraine on Local Self-Government in Ukraine and other legislative acts of Ukraine on people's power at the level of local self-government, No. 3703, 05.05.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3703-IX#Text>

⁸¹ Draft Law on Amendments to the Law of Ukraine on Bodies of Self-Organisation of the Population regarding the improvement of the procedure for the organisation, activities and termination of a body of self-organisation of the population, No. 6319, 18.11.2021 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/28346>.

The Law on Public Consultations⁸² was also adopted (by the Parliament of Ukraine in June 2024 and signed by the President in October 2024), which provides for mandatory consultations at the national and local levels. The Law does not, however, set out criteria on who can take part in consultations. In practice, all CSOs (including unregistered organisations) take part.

Throughout 2024, the authorities continued to use the following consultation mechanisms:

- Electronic/online consultations. For example, from 3-10 August 2024, electronic/online consultations with the public were held on the Draft Order of the CMU on the approval of the Strategy for the cognitive de-occupation of the Autonomous Republic of Crimea and the city of Sevastopol;⁸³
- Working groups. For example, the Working Group under the Ministry of Reintegration was created in April 2024 and included, among others, CSOs.⁸⁴ From September 2024, the Group worked on proposals for the project of the State Policy Strategy on ensuring the housing rights of IDPs. CSOs have also been involved in the preparation of a special report by the Commissioner of the Parliament of Ukraine on the situation in the territories of Ukraine temporarily occupied by the Russian Federation;⁸⁵ and
- Meetings and roundtables. For example, the Temporary Special Commission of the Parliament of Ukraine on the Protection of the Rights of IDPs⁸⁶ organised the parliamentary-public forum 'Strengthening the Protection of the Rights of Internally Displaced Persons', which took place on 22 October 2024 in Khmelnytskyi.⁸⁷ Also, in May 2024, the roundtable 'Integration of foreigners in Ukraine: the experience of refugee communities, new challenges and prospects'⁸⁸ was held by the Right to Protection Charitable Foundation joined by, among others, representatives of the

⁸² Law of Ukraine on Public Consultations, No 3841-IX, 20.06.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3841-20#Text>

⁸³ Ministry for Reintegration of Temporarily Occupied Territories of Ukraine, 'The Ministry of Reintegration reports on conducting electronic consultations' (in Ukrainian), <https://unity.gov.ua/2024/07/18/minreintegracziyi-povidomyaye-pro-provedennya-elektronnyh-konsultacij-11/>

⁸⁴ The working group under the Ministry of Reintegration is working on proposals for the project of the State Policy Strategy on ensuring the housing rights of IDPs, <https://minre.gov.ua/2024/04/20/robocha-grupa-pry-minreintegracziyi-napracovuye-propozycziyi-do-proyektu-strategiji-derzhpolityky-shhodo-zabezpechennya-zhytlovyh-prav-vpo/>.

⁸⁵ The first meeting of the working group on the preparation of a special report by the Plenipotentiary of the Verkhovna Rada of Ukraine on the situation at the TOT, https://ombudsman.gov.ua/uk/news_details/pershe-zasidannya-robochoyi-grupi-shhodo-pidgotovki-specialnoi-dopovidi-upovnovazhenogo-verhovnoyi-radi-ukrayini-shhodo-situaciyi-na-tot.

⁸⁶ In full, the Temporary Special Commission of the Verkhovna Rada of Ukraine on the Protection of Property and Non-property Rights of Internally Displaced Persons and Other Persons Affected by the Armed Aggression of the Russian Federation against Ukraine.

⁸⁷ We Help The VRU To Strengthen The Control Function And Improve Policy, <https://internews.ua/rang/news/strengthen-oversight-function>.

⁸⁸ 'Integration of foreigners in Ukraine: experience of refugee communities, new challenges and prospects'. CF 'Right to Protection' held a roundtable in Kyiv, <https://r2p.org.ua/page/intehratsiia-inozemtsiv-v-ukraini-dosvid-spilnot-bizhentsiv-novi-vyklyky-i-perspektyvy-bf-pravo-na-zakhyst-proviv-kruhlyi-stil-u-kyievi>.

Ministry of Social Policy, the Ministry of Education and Science, the Ministry of Culture and Information Policy,⁸⁹ and the Office of the Commissioner of the Parliament of Ukraine on Human Rights.

However, in 2024, the format and effectiveness of these consultation mechanisms continues to depend on which state or local self-government body has initiated them. Experts note that, by the end of 2024, a significant proportion of key state and local government decisions will have been made without the involvement of CSOs. This is confirmed by comparing the number of adopted legal acts with the number of notifications of consultations as of October 2024.⁹⁰ Additionally, significant difficulties have been reported by CSOs in relation to their involvement in the development of draft regulations, in contrast to strategic documents, since for the former there is a practice of significant changes to their provisions during the internal approval stage in which CSOs are not involved.⁹¹

CSOs that have been displaced as a result of Russian aggression are increasingly actively involved in activities in host communities, at the national level, and in work with IDPs in state and local self-government bodies. For example, in 2024, the CSO *Tochka Dostupu* ('Access Point'),⁹² which relocated from the Donetsk region to the Ivano-Frankivsk region, in 2024 began implementing a project in partnership with the Ivano-Frankivsk regional branch of the Association of Cities of Ukraine to strengthen social cohesion and institutional capacity in working with IDPs in the region in which the CSO is now located.⁹³

Experts note⁹⁴ the generally low level of openness of the Parliament of Ukraine, the CMU and the Office of the President of Ukraine in relation to including civil society in decision-making. There are, however, interactions of note in certain thematic areas. For example, in October 2024, President Zelenskyy held a meeting⁹⁵ with leaders of CSOs working in the fields of international politics, advocacy, protection of human rights, security and defence. On 25 September 2024, under the leadership of the Deputy Head of the Office of the President of Ukraine Iryna Vereshchuk, a meeting was held with representatives of volunteer organisations and charitable foundations on the development of the volunteer movement in Ukraine.⁹⁶ There

⁸⁹ Since 6 September 2024, the Ministry of Culture and Strategic Communications.

⁹⁰ Carried out during the preparation of the report by comparing information in individual areas on the websites of the central executive authorities during 2024.

⁹¹ Civil society experts with expertise in relevant CSO Meter areas. Data were collected through interviews, consultations, and focus groups.

⁹² 'Tochka Dostupu' NGO, <https://dostupoint.org.ua>.

⁹³ Three communities of Ivano-Frankivsk region were selected to participate in the project on the integration of IDPs, <https://dostupoint.org.ua/try-gromady-ivano-frankivshhyny-vidibrani-dlya-uchasti-u-proyekti-z-integraciyi-vpo/>.

⁹⁴ Civil society experts with expertise in relevant CSO Meter areas. Data were collected through interviews, consultations, and focus groups.

⁹⁵ Zelensky met with civil society. Maksym Butkevich was at the meeting, <https://zmina.ua/event/zelenskyj-zustrivsya-iz-gromadyanskym-suspilstvom-na-zustrichi-buv-maksym-butkevych/>.

⁹⁶ The East SOS team took part in a meeting at the President's Office regarding the development of the volunteer movement, <https://east-sos.org/publications/komanda-skhid-sos-vzyala-uchast-u-naradi-v-ofisi-prezydenta-shhodo-rozvytku-volonterskogo-ruhu/>.

are no reported repercussions against CSOs that participate in decision-making processes. Similarly, there were no reported cases of civil society and CSOs not being consulted or being excluded from decision-making as a result of their criticism of the authorities.

Standard II. There is regular, open and effective participation of CSOs in developing, implementing and monitoring public policies.

During 2024, there has been progress in developing a law to ensure regular, open and effective participation of CSOs in public policies. Law No. 3841-XI⁹⁷ provides for mandatory consultations at the national and local levels. However, CSOs are concerned about two issues related to the provisions. First, the law gives MPs the right, but does not impose the obligation, to hold consultations; organising consultations is therefore not mandatory. Secondly, the law will only enter into force twelve months after the end of martial law in Ukraine. At the local level, the procedures for citizen participation in decision-making processes are regulated by the Law on Local Self-Government in Ukraine,⁹⁸ as well as by statutes and regulations of specific communities.

The existence of advisory bodies (created by state or local self-government bodies) does not generally limit the ability of CSOs to participate in public consultations. A common practice is interaction not through such bodies, but through thematic working groups established for a specific purpose. For example, in 2024, in addition to the functioning of a public council, a working group was created by the Ministry of Education and Science to ensure access to general secondary education for children from the temporarily occupied territories. While current legislation and practice provide for the involvement of public councils in policy implementation, monitoring and assessment, the possibility remains insufficiently used. Experts have identified that monitoring and evaluation of projects or policies is often initiated by CSOs themselves.

As a result of the interviews and focus groups conducted by ISAR Ednannia for the purposes of this report, it was established that, during 2024, the effectiveness of consultations varies depending on the body and topic in question. Likewise, there is variation in the practice of CSOs being invited to contribute to the decision-making process at the earliest possible stage with sufficient time to do so. Some central executive authorities (for example, the Ministry of Justice, the Ministry of Social Policy, and the Ministry of Veterans Affairs) held consultations, but the input from CSOs was typically not meaningfully considered in the final resulting decision or document. For example, CSOs participated in the development of the Concept for the Restoration of Education in the De-occupied Territories for 2024–2027 by submitting

⁹⁷ Law of Ukraine on Public Consultations, No 3841-XI, 20.06.2024 (in Ukrainian), https://w1.c1.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=70235.

⁹⁸ Law of Ukraine on Local Self-Government in Ukraine, No. 280/97-BP, 21.05.1997(in Ukrainian), <https://zakon.rada.gov.ua/laws/show/280/97-bp#Text>.

proposals in its early stages. Subsequently, the Concept was supplemented with an Action Plan prepared together with CSOs. However, on 20 September 2024, the government approved only the Action Plan without approving the Concept.⁹⁹ The reasons for this decision were not made public.

Experts also note more frequent cases of public consultations initiated by MPs. For example, within the scope of the work of the Temporary Special Commission of the Parliament of Ukraine on the Protection of the Rights of IDPs, representatives of CSOs were involved in the development of the Draft Law on Ensuring the Housing Rights of IDPs.¹⁰⁰ In 2024, state and local authorities continue to have different practices in relation to providing feedback on proposals submitted by CSOs. In most cases, CSOs do not receive a response to their submitted proposals in the format 'taken into account/not taken into account' with the appropriate justification.

Standard III. CSOs have access to information necessary for their effective participation.

The conditions and scope of access to information are determined by the Law on Access to Public Information¹⁰¹ and the Law on Information.¹⁰² The procedure for access to information is clear and free of charge. The relevant procedures are specified through acts that regulate the work of a particular body, such as the Rules of Procedure of the CMU.¹⁰³

In practice, CSOs mostly obtain access to information through the information available on the official websites of state institutions and by sending formal requests for access to public information. It is possible to submit such requests online through the websites of some state and local authorities. For example, appeals to the Parliament of Ukraine, MPs can be submitted through the platform for electronic appeals available on the Parliament's website.¹⁰⁴ At the same time, the website of the Ministry of Development of Communities and Territories, which has an electronic application submission form,¹⁰⁵ still does not accept such applications in 2024.

⁹⁹ The government approved a plan to restore education in the de-occupied territories,

<https://mon.gov.ua/news/uriad-zatverdyyv-plan-vidnovlennia-osvity-na-deokupovanykh-terytoriiakh>.

¹⁰⁰ Draft Law on Amendments to Certain Laws of Ukraine on Ensuring the Housing Rights of Internally Displaced Persons, No 12281, 21.05.2024 (in Ukrainian),

<https://itd.rada.gov.ua/billInfo/Bills/CardByRn?regNum=11281&conv=9>.

¹⁰¹ Law of Ukraine on Access to Public Information, No. 2939-VI, 13.01.2011 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/2939-17#Text>.

¹⁰² Law of Ukraine on Information, No. 2657-XII, 02.10.1992 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/2657-12#Text>.

¹⁰³ Resolution of the CMU on Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine, No. 950, 18.07.2017 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/950-2007-п#top>.

¹⁰⁴ Verkhovna Rada of Ukraine: electronic appeals (in Ukrainian), <https://itd.rada.gov.ua/appeal-of-citizens-new/Appeals/createEditAppeal>.

¹⁰⁵ Ministry of Community and Territorial Development of Ukraine: Electronic appeals (in Ukrainian), <https://mtu.gov.ua/content/elektronne-zvernennya.html>.

Experts have noted¹⁰⁶ that, in relation to access to information, there are still cases of unreasonable refusals, delayed responses (including due to difficulties with electricity supply), and failure to provide information due to ‘restricted access during martial law’ (mainly information that may be of particular public interest). There are, however, also some positive trends¹⁰⁷ in 2024 relating to the publication of information on drafts, as well as notifications of public hearings or participatory discussions of draft regulations following the introduction of urgent measures due to martial law. For example, during 2024, the Ministry of Social Policy has regularly submitted draft legal acts for public discussion with further information on the number of submitted proposals, agreements and disagreements.¹⁰⁸ However, some experts have noted the continuation in 2024 of the negative practice of state and local self-government bodies only publishing information on their social network pages and not on their websites. This approach complicates access to information for certain groups by creating an access threshold (registering for and having an account on a social network) and does not ensure sustainability. The website of the Parliament of Ukraine provides information on decisions made and measures taken, but there is no proper information on committee meeting agendas, for example. Lack of information makes it difficult for CSOs to know which laws are on the agenda and how they can take part in shaping those laws.

Standard IV. Participation in decision-making is distinct from political activities and lobbying.

There is no legislation on the political activities of CSOs in Ukraine. There are no restrictions that affect the ability of CSOs to engage in public and political activities.

In 2024, CSOs are free to engage in advocacy activities without the need to register as lobbyists or professional advocates, or to incur any additional administrative or financial burden. On 23 February 2024, the Parliament of Ukraine adopted the Law on Lobbying¹⁰⁹ (entering into force in 2025) which ensures that Ukraine meets the requirements set by the EU as part of its EU integration process. The Law aims to regulate all activities related to policy change, including lobbying, with some exceptions for activities subject to public consultation provisions.¹¹⁰ CSOs demanded transparent, meaningful and inclusive public consultations¹¹¹ regarding the Law at

¹⁰⁶ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

¹⁰⁷ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

¹⁰⁸ Access to public information: Ministry of Social Policy of Ukraine, <https://www.msp.gov.ua/timeline/Publicchna-informaciya.html>.

¹⁰⁹ Law of Ukraine on Lobbying, No. 3606-IX, 23.02. 2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3606-20#Text>.

¹¹⁰ CSOMeter, Ukraine: New Law on Lobbying could restrict CSOs' advocacy activities, <https://csometer.info/updates/ukraine-new-law-lobbying-could-restrict-csos-advocacy-activities>.

¹¹¹ Public demands transparent, meaningful and inclusive public consultations on draft laws on lobbying: CSOs' appeal, <https://www.vplyv.org.ua/archives/8122>.

all stages, since the initial draft text provided for the regulation of advocacy activities. MPs did not, however, completely exclude the activities of CSOs from the Law. CSOs are not considered lobbyists, 'except when such activities relate to commercial interests'.¹¹² Risks for CSOs in this area therefore remain. Experts note that the consequences of the Law for CSOs may be mitigated or exacerbated depending on how it is implemented and how society and the public sector react to it.¹¹³ Furthermore, in 2024, initiatives to amend the Law to regulate the activities of CSOs remain under discussion even before its entry into force.

Recommendations:

- The Parliament of Ukraine should adopt Draft Law No. 6319, which provides for the improvement of the procedure for the organisation, activities and termination of a body of self-organisation of the population;
- The Parliament of Ukraine, the CMU and other executive authorities, the Office of the President of Ukraine, and local self-government bodies should ensure openness and participation of CSOs in the decision-making process from the initial stages to monitoring and assessment;
- The Parliament of Ukraine should review the provisions of the Law on Public Consultations stating that it will not enter into force until one year after the end of martial law and define the obligation of MPs to hold public consultations;
- State bodies at all levels and local self-government bodies should comply with the Law on Access to Public Information to provide answers to requests and appeals and to limit access to information only after using the three-fold test provided for in Part 2 of Article 6 of the Law; and
- Relevant state authorities should hold transparent, meaningful and inclusive public discussions to further monitor the implementation of the Law on Lobbying and its impact on CSOs in order to avoid situations of unequal interpretation and abuse.

¹¹²ZMINA Human Rights Centre, 'Passions behind lobbying: what does the long-suffering law 'On Fair Lobbying' mean?' (in Ukrainian), <https://zmina.info/columns/prystrasti-za-lobizmom-shho-nese-bagatostrazhdalnyj-zakon-pro-dobrochesne-lobiyuvannya/>.

¹¹³ Detector media, How lobbying threatens civil society organisations (in Ukrainian), <https://cs.detector.media/reforms/texts/186026/2024-04-05-chym-zagrozhue-lobizm-organizatsiyam-gromadyanskogo-suspilstva/>.

3.6 Freedom of Expression

Overall score per area: **4.9** / 7

Legislation: **5.5** / 7

Practice: **4.2** / 7

The right to freedom of expression is protected by law, though it is subject to restrictions under martial law. The Law on Media is being gradually implemented in 2024. There are no restrictions on the free use of the internet or other means of communication and there are clear protections and guarantees against censorship. The work of journalists in the Parliament of Ukraine was restored during the current reporting period. However, there have been cases of persecution of anti-corruption activists, which were investigated, as well as the registration of Draft Law No. 7033-d, which could restrict access to a number of categories of court decisions. The Russian Federation continues its practice of illegal actions against the media, using it as an element of war. Media professionals, journalists, and activists have suffered as a result of the armed hostilities, including being killed or wounded.

Given the absence of relevant legislative changes and the presence of both positive and negative practices, the overall score in this area, as well as the scores for Legislation and Practice, remain unchanged from 2023. In the coming period, the recommendation aimed at continuing the proper recording and investigation of crimes committed by the Russian Federation at the national level against activists and media remains relevant.

Standard I. The right to freedom of thought and speech, and to the free expression of one's views and beliefs is guaranteed.

Article 34 of the Constitution of Ukraine stipulates that everyone has the right to freely collect, store, use and disseminate information orally, in writing or in any other way of their choice. The right is guaranteed to any person, citizen of Ukraine or foreigner, individually or collectively, including CSOs, without discrimination. The legislation does not provide for consequences or disproportionate sanctions for the expression of opinions and views. There are also no sanctions for the dissemination of information based on the broad and vague definitions of 'fake news' or 'disinformation' not verified by the state. Due to the current imposition of martial law in Ukraine,¹¹⁴ the right to freedom of expression may be restricted and the military command¹¹⁵ may regulate the work of the relevant institutions. Examples include a directive not to disclose information about prisoners of war and the rules for filming in hospitals during martial law.

¹¹⁴ Decree of the President on Martial Law, No. 64/2022, 24.02.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/64/2022#top>.

¹¹⁵ Law of Ukraine on The Legal Regime of Martial Law No. 389-VIII, 12.05.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/389-19#n48>.

Despite the ongoing armed aggression, Ukraine has improved its ranking in Reporters Without Borders' World Press Freedom Index for 2024,¹¹⁶ moving up to 61st place out of 180 countries (compared to 79th place in 2023 and 106th place in 2022). CSOs and associated individuals are free to seek, receive and impart information and ideas of all kinds through any media. Media organisations are obligated to provide their employees with protection against firearm and shrapnel injuries. Additionally, mandatory insurance for journalists, at the employer's expense, is required in case of damage to their life and/or health while covering the war.¹¹⁷ There have been no cases of prosecution or conviction of journalists, activists or representatives of CSOs for creating or disseminating 'fake news' or 'disinformation'.

According to experts, there are cases of violation of the freedom of expression of activists and CSOs working on issues such as the protection of LGBTQ+ rights, the fight against corruption and the fight against illegal construction. Such violations mainly consist of attacks on pages in social networks, disinformation or intimidation. In addition, the activities of the Public Broadcaster have been encroached upon by individual state officials disseminating inaccurate and false information.¹¹⁸ Overt pressure was exerted by some MPs who spread inaccurate information about the nature of the Public Broadcaster, including its level of funding and the remuneration of its supervisory board, which works on a voluntary basis.

The Law on Media,¹¹⁹ which came into force in 2023, provides a clear and proportionate mechanism for media liability. In 2024, the Law's provisions regarding guarantees of the media regulator's financial independence were suspended. Also, a register of subjects in the field of media and an electronic cabinet have not been developed. The reform of communal media, which must be re-registered as public media, is not ensured. During martial law, this obligation has been postponed.¹²⁰

In the two years and six months following the start of the full-scale invasion on 24 February 2022, according to data from the Institute of Mass Information, Russia has committed 620 crimes against journalists and media in Ukraine.¹²¹ In August 2024 alone, three media

¹¹⁶ Reporters Without Borders, index, <https://rsf.org/en/index>.

¹¹⁷ Law on the Introduction of Amendments to Certain Laws of Ukraine Regarding the Provision of Additional Guarantees of Protection for Media Workers Operating in Areas of Military (combat) Operations and/or in the Temporarily Occupied Territories of Ukraine, No. 2382-IX, 08.07. 2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2382-20?lang=en#Text>.

¹¹⁸ Statement on the Attempted Attack on Ukraine's European Integration Process and the Independence of Suspilne UA Public Broadcaster, <https://dslua.org/publications/zaiava-shchodo-zamakhu-na-protses-ievropeyskoi-intehratsii-ukrainy-ta-nezalezhnosti-suspilnoho/>.

¹¹⁹ Law of Ukraine on Media, № 2849-IX, 13.12.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2849-20#Text>.

¹²⁰ Detector Media, What hinders the implementation of the law 'On Media', 11.04.2024 (in Ukrainian), <https://detector.media/infospace/article/225341/2024-04-11-shcho-zavazhaie-implementatsii-zakonu-pro-media/>

¹²¹ Mass information institute, 620 crimes by the Russian Federation against the media and journalists in two and a half years of full-scale war (updated), 24.08.2024 (in Ukrainian), <https://imi.org.ua/monitorings/617-zlochyniv-vchynyla-rf-proty-media-ta-zhurnalistiv-za-dva-z-polovynoyu-roky-povnomasshtabnoyi-i63178>.

professionals were killed in the war and four journalists were injured in a Russian attack on a hotel in the city of Kramatorsk.¹²²

The problem of hate speech related to ethnic and territorial origin, gender, social status or age did not escalate during the reporting period. Filtering or hiding content on social media continues to have a negative effect.

Standard II. The state promotes and protects freedom of opinion and expression.

There are no restrictions on the free use of the internet or other means of communication for the expression of opinions. Further, there are clear protections and safeguards against censorship, despite the conditions of martial law currently in place. The law protects the confidentiality of whistle-blowers and journalists' sources of information. The Civil Code defines clear and proportionate sanctions for defamation (including libel and slander) and it is not criminalised. However, the practical enforcement mechanisms are inadequate for addressing cases of defamation or libel on social media and online platforms, where harmful messages can reach thousands of people and spread far more widely than any subsequent refutation.

The Law on Media establishes clear grounds and procedures for refusing to register or cancelling the registration of media entities. The monitoring for this report did not point to any cases of conventional or online media being blocked in a disproportionate way not based on the legal grounds. Publishing online does not require special permission or compliance with special administrative rules applicable to traditional media. During the reporting period, following public statements from CSOs and media,¹²³ the possibility for journalists to work in and around the Parliament of Ukraine¹²⁴ was restored. At the regional and local levels, access for journalists to government meetings is considered on a case-by-case basis.

The United News Marathon, created after Russia's full-scale invasion to counter a wave of Russian disinformation, is currently facing sharp criticism in Ukraine.^{125, 126} It is criticised for its

¹²²Mass information institute, Freedom of speech barometer for August 2024 (in Ukrainian), <https://imi.org.ua/monitorings/barometr-sv-obody-slova-za-serpen-2024-roku-i63424>.

¹²³ Mass information institute, statement of human rights NGOs, media and journalists on the admission of journalists to parliamentary sessions and to the sidelines (in Ukrainian), <https://imi.org.ua/news/verhovnu-radu-zaklykayut-dopustyty-zhurnalistiv-do-svoyih-zasidan-i-v-kuluary-i58981>.

¹²⁴ Press service of the Supreme Council of Ukraine, the Speaker of the Ukrainian Parliament Ruslan Stefanchuk signed an order on the admission of journalists to the Supreme Council of Ukraine under martial law, 08.05.2024 (in Ukrainian), <https://www.rada.gov.ua/news/Novyny/249274.html>.

¹²⁵Mass information institute, the international human rights organisation Reporters Without Borders calls on the Ukrainian authorities to abandon the United News Marathon, 07.02.2024 (in Ukrainian), <https://imi.org.ua/news/reportery-bez-kordoniv-zaklykayut-vladu-ukrayiny-vidmovytsya-vid-yedynogo-telemarafonu-i59030>.

¹²⁶ Ukrainian Institute of Media and Communication, analytical report 'Effectiveness of Countering Russian Disinformation in Ukraine in a Full-scale War' (in Ukrainian), <https://www.jta.com.ua/wp-content/uploads/2023/08/UMCI-Effectiveness-of-Russian-Disinformation-Counteration-UA.pdf>.

perceived complementarity with the government line, the self-censorship of its journalists and the lack of available opposition channels.

Despite a lack of confirmed information on cases of convictions of journalists or searches of media premises by the authorities to uncover information sources, there has been a surge in the persecution of anti-corruption activists and investigative journalists. This includes covert surveillance of the team behind *Bihus.Info* (an investigative journalism platform known for uncovering corruption, financial fraud, and abuse of power among public officials, politicians, and business figures in Ukraine),¹²⁷ an attempted break-in at the home of the investigative journalist Yuriy Nikolov in January 2024,¹²⁸ and a number of other cases of direct pressure on media professionals.

Lastly, the approval in its first reading in May 2024 of Draft Law No. 7033-d,¹²⁹ which proposes to restrict access to a number of categories of court decisions and has the potential to negatively affect freedom of speech for civil society and researchers, is a cause for concern.¹³⁰ CSOs note that its adoption could limit public access to important information, increase distrust in the authorities, hinder public oversight of the judiciary and risks contradicting the principles of a democratic society and Ukraine's commitments to EU integration.¹³¹ There have been calls for the Draft Law's repeal or revision.¹³²

Recommendations:

- Law enforcement, including the Prosecutor General's Office, should continue investigating and documenting Russian crimes against CSO representatives and the media to hold Russia accountable;
- The law enforcement agencies should ensure immediate investigation of cases of persecution of CSO and media representatives, including anti-corruption activists, and take preventive measures against them;

¹²⁷ *Bihus.Info*, At least 30 people participated in the surveillance operation for *Bihus.Info* (in Ukrainian),

<https://bihus.info/shhonajmenshe-30-lyudej-braly-uchast-v-operacziyi-stezhennya-za-bihus-info-novi-detali/>.

¹²⁸ Detector media, the attack on the apartment of journalist Yury Nikolov: the police announced that they were conducting an investigation (in Ukrainian), <https://detector.media/community/article/221738/2024-01-15-napad-na-kvartyru-zhurnalista-yuriya-nikolova-politsiya-ogolosyla-shcho-provodyt-perevirku/>.

¹²⁹ Draft Law on Amendments to Certain Laws of Ukraine on Preventing the Disclosure of Certain Information in the Texts of Court Decisions, No. 7033-d, 03.01.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/41159>.

¹³⁰ Group of influence, Appeal of NGOs regarding the restriction of the public's right to freely access information from the court register and to monitor court proceedings, in particular those with a significant public profile, 20.05.2024 (in Ukrainian), <https://www.vplyv.org.ua/archives/9001>.

¹³¹ Hromadske TV, 'Human rights activists call for the rejection of the bill that restricts access to court decisions', 16.05.2024 (in Ukrainian), <https://hromadske.ua/polityka/224207-pravozakhysnyky-zaklykaiut-ne-ukhvaliuvaty-zakonoprojekt-iakyy-obmezuye-dostup-do-sudovykh-rishen>.

¹³² NGO Human Rights Platform, 'We urge the Verkhovna Rada not to adopt Bill No. 7033-d, which restricts access to court decisions', 16.05.2024 (in Ukrainian), https://ppl.org.ua/zaklikayemo-verxovnu-radu-ne-prijmati-zakonoprojekt-7033-d-yakij-obmezhuje-dostup-do-sudovix-rishen.html?utm_source=chatgpt.com

- Local (military) state administrations and local self-government bodies should provide journalists with access to their proceedings, ensure broadcasts and publish information in a timely manner; and
- The Parliament of Ukraine should withdraw the Draft Law No. 7033-d, which proposes to restrict access to a number of categories of court decisions and has the potential to negatively affect freedom of speech.

3.7 Right to Privacy

Overall score per area: **4.1** /7

Legislation: **4.9** /7

Practice: **3.2** /7

The right to privacy is guaranteed by the Constitution of Ukraine and other legislation. There were no legislative changes in this area in the reporting period and those legislative initiatives submitted in previous periods remain stagnant. In practice, new initiatives aimed at expanding the powers of counterintelligence agencies and introducing video monitoring of public security have raised concerns within civil society. The mechanisms for investigating violations in this area remain ineffective. Despite the state's guarantee of the right to privacy for CSOs, this protection is complicated or rendered impossible due to the actions of the Russian Federation.

The overall score for the area of Right to Privacy, as well as the scores for Legislation and Practice, remain the same as in the previous reporting period. The adoption of the new Law on Personal Data Protection, the withdrawal of Draft Law No. 11031 from consideration, and the ensuring of privacy protection are recommended for 2025.

Standard I. Everyone has the right to privacy and data protection.

The right to privacy is guaranteed by the Constitution of Ukraine (Articles 28, 30, 31 and 32). The right is fully or partially enshrined in the Criminal Code,¹³³ the Criminal Procedure Code¹³⁴ and the Civil Code,¹³⁵ as well as, among others, the Law on Counterintelligence Activities¹³⁶ and

¹³³ Criminal Code of Ukraine, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

¹³⁴ Criminal Procedure Code, No. 4651-VI, 13.04.2012 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4651-17#Text>.

¹³⁵ Civil Code of Ukraine, No. 435-IV, 16.01.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/435-15#Text>.

¹³⁶ Law of Ukraine on Counterintelligence Activities, No. 374-IV, 26.12.2002 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/374-15>.

the Law on Personal Data Protection.¹³⁷ The latter regulates legal relations related to the collection, protection and processing of personal data by the state authorities. However, the existing legislation does not fully take into account the development of emerging technologies and the ongoing armed aggression of the Russian Federation against Ukraine, the risks caused by it, and the need for personal data protections to be updated.

On 20 November 2024, the Draft Law on Personal Data Protection¹³⁸ was adopted by the Parliament of Ukraine in its first reading. The Draft Law on the National Commission on Personal Data Protection and Access to Public Information¹³⁹ is awaiting parliamentary consideration. Both of the Draft Laws were designed to create a basis for the protection of personal data in both the public and private sectors (extended rights of the subject of personal data), bringing the provisions of Ukrainian legislation in line with international standards, in particular Convention 108¹⁴⁰ and the EU General Data Protection Regulation (EU GDPR).

Among the human rights and freedoms that continue to be restricted under martial law are the inviolability of the home, the secrecy of correspondence, telephone conversations, telegraphic and other correspondence, and guarantees of non-interference in private and family life. Key challenges that these restrictions under martial law bring include simplification of the procedure for interference with the right to privacy in the framework of investigative actions in criminal proceedings (namely, the weakening of guarantees of the judicial control over such interference), simplification of the procedure for law enforcement and security agencies to exercise their powers of access to personal data (conducting phone checks, surface inspections, car inspections at checkpoints, etc.), and expansion of the use of video recording cameras and relevant software to ensure public safety and identify persons involved in offences.¹⁴¹

In 2024, Draft Law No. 11228¹⁴² and Draft Law No. 11228-1¹⁴³ (adopted in its first reading), were submitted by MPs to the Parliament of Ukraine. The Draft Laws expand the powers of counterintelligence agencies, including to create and access information systems and

¹³⁷ Law of Ukraine on Personal Data Protection, No. 2297-VI, 01.06.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2297-17>.

¹³⁸ Draft Law on Personal Data Protection, No. 8153, 25.10. 2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/40707>.

¹³⁹ Draft Law on the National Commission on Personal Data Protection and Access to Public Information, No 6177, 18.10.2021 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/27996>.

¹⁴⁰ Council of Europe Modernised Convention for the Protection of Individuals with Regard to the Processing of Personal Data (2018), <https://www.coe.int/en/web/data-protection/convention108/modernised>.

¹⁴¹ Ukrainian Helsinki Human Rights Union, Analysis of legislation on restrictions on the right to privacy under the martial law, (in Ukrainian), https://www.helsinki.org.ua/wp-content/uploads/2024/05/Preview_Limit_privacy_A4.pdf.

¹⁴² Draft Law on Amendments to the Criminal and Criminal Procedure Codes of Ukraine, Other Legislative Acts of Ukraine on the Regulation of Issues of Countering Intelligence and Subversive Activities of Special Services of Foreign States, No 11228, 30.04.2024, (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/44125>.

¹⁴³ Draft Law on Amendments to the Criminal and Criminal Procedure Codes of Ukraine, Other Legislative Acts of Ukraine on the Regulation of Issues of Countering Intelligence and Subversive Activities of Special Services of Foreign States, No 11228-1, 10.05.2024, (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/44187>.

databases, including video monitoring systems.¹⁴⁴ Draft Law No. 11031 on the Unified System of Video Monitoring of Public Security¹⁴⁵ was also registered in the Parliament of Ukraine by MPs. Digital Security Lab Ukraine,¹⁴⁶ a CSO comprised of specialists in the field of digital security and internet freedom, has assessed Draft Law No. 11031 as in violation of the fundamental right to privacy of data subjects because of the risks associated with the excessively broad discretion that it accords to the state and municipal authorities, the insecurity of data capture and technical problems with video monitoring systems.¹⁴⁷

Despite the fact that the Criminal Code and the Civil Code provide for the investigation and prosecution of violations of the right to privacy, this mechanism, according to experts,¹⁴⁸ remains ineffective and requires review and strengthening of the work of relevant institutions in this area, including the Office of the Commissioner of the Parliament of Ukraine on Human Rights. In particular, there is no simplified mechanism for CSOs that does not require proof of actual damage caused to them (or in the future). CSOs are therefore often unable to access effective legal recourse when their rights are violated because privacy violations may not always lead to immediate or tangible damage but can still have long-term consequences.

Standard II. The state protects the right to privacy of CSOs and associated persons.

The reporting requirements for CSOs of the Tax Code and, among others, Orders of the Ministry of Finance¹⁴⁹ do not violate the privacy of CSOs' members, donors, board members or employees, or the confidentiality of their personal assets. During the 2024 reporting period, there were no attempts to introduce additional reporting measures by the authorities, including those related to receiving funding from abroad.

Access to CSOs' office premises can be obtained only on the basis of a court decision and within the framework of criminal proceedings. The legal framework and procedure for conducting searches are set out in the Criminal Procedure Code and the Law on Operational and Investigative Activities.¹⁵⁰ CSOs are provided with legal protections – through preventive or remedial measures – to prevent abuses of power by the authorities when accessing their premises (such as entering without proper legal grounds or conducting unlawful searches).

¹⁴⁴ Digital Security Lab, monthly digest on media and digital rights regulation in Ukraine, May 2024.

https://dslua.org/wp-content/uploads/2024/06/Digest-11-May-2024_UPD.pdf.

¹⁴⁵ Draft Law on a Unified System of Video Monitoring of Public Security, No. 11031, 20.02.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43733>.

¹⁴⁶ Digital Security Lab, <https://dslua.org>.

¹⁴⁷ Digital Security Lab, Draft Law on video monitoring: protection of public security or a licence for mass surveillance, 09.05.2024 (in Ukrainian), <https://dslua.org/publications/zakonoproiekt-pro-videomitorynh-zakhyst-publichnoi-bezpeky-chy-litsenzia-na-masove-stezhennia/>.

¹⁴⁸ Civil society experts with expertise in relevant CSO Meter areas. Data were collected through interviews, consultations, and focus groups.

¹⁴⁹ Order on Approval of the Form of the Report on the Use of Income (profits) of a Non-profit Organisation, No. 553, 17.06.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/z0932-16#Text>.

¹⁵⁰ Law of Ukraine on Operational and Investigative Activities, No. 2135-XII, 18.02.1992 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2135-12#Text>.

However, there have been cases of unauthorised interference with the privacy or communications of activists and journalists.^{151, 152} Criminal proceedings have been initiated by the SBU¹⁵³ for surveillance of journalists of the *Bihus.Info* investigative journalism platform through the alleged illegal installation¹⁵⁴ and use of special technical means of covertly obtaining information. Experts note that there may be many more such cases against activists, including at the local level.

Incidents of phishing affecting CSOs have been reported in 2024. For example, a cyberattack was reported by the editorial office of Free Radio, which received a number of phishing emails, the authors of which claimed to be the State Tax Service and the SBU.¹⁵⁵ There have also been cases of personal data being used to discredit and create conflicts within CSOs. In April 2024, Iryna Fedoriv, a civic activist and leader of the 'Holka' civic initiative, stated that an unknown person had filed a complaint on her behalf with the State Bureau of Investigation against her colleague, civic activist and editor-in-chief of the 'CHESNO Movement', Oleksandr Salizhenko, for allegedly evading military service.¹⁵⁶

The challenges related to the right to privacy in the temporarily occupied territories are particularly severe, given Russia's systemic violations.¹⁵⁷ Special attention must be given to protecting data within information and communication systems, as well as public electronic registers – especially those containing sensitive information on military personnel, their families, journalists, and activists. This is crucial to prevent the aggressor state from exploiting these data to intimidate the local population and commit further crimes.

¹⁵¹ Attorney General's Office. Criminal proceedings have been initiated in Kyiv Oblast based on the journalist's statement, 18.01.2024 (in Ukrainian), <https://www.gp.gov.ua/ua/posts/na-kiyvshhini-za-zayavoyu-zurnalistki-rozpocato-kriminalne-provadzennya>.

¹⁵² ZMINA Human Rights Centre, Mediarukh demands from President Zelensky a reaction to the pressure on independent journalists and investigators (in Ukrainian), https://zmina.ua/statements/mediarukh-vymagaye-vid-prezydenta-zelenskogo-reakciji-na-tysk-na-nezaleznyh-zhurnalistiv-ta-rozsliduvachiv/?fbclid=IwZXh0bgNhZW0CMTEAAR0EpQJDxCpl6cFPoZ0feeV8sOGy_6cXkw-vwz45s0J23VNI2R2RURcoL9I_aem_gQGJySayQ7bgmcl9Q5YA.

¹⁵³ Commentary on the press service of the SBU, 17.01.2024 (in Ukrainian), https://ssu.gov.ua/novyny/komentar-pressluzhby-sbu3?fbclid=IwAR1iXy09bTO_DPBcwu6_uvru4Vck9U1EDfELfi3L8NKRah5VRzuykPmmuZk.

¹⁵⁴ Information portal *Bihus.Info*, <https://bihus.info>.

¹⁵⁵ Mass information institute, 'The editors of Vilny Radio suffered a series of phishing attacks aimed at the media's corporate mail', 22.08.2024 (in Ukrainian), <https://imi.org.ua/news/vilne-radio-otrymalo-nyzku-fishyngovyh-lystiv-avtory-yakyh-predstavlyalsya-podatkovoyi-ta-sbu-i63161>.

¹⁵⁶ ZMINA Human Rights Centre, 'Activist Iryna Fedoriv said that someone on her behalf appealed to the SBI with a complaint about her colleague Oleksandr Salizhenka', 29.04.2024 (in Ukrainian), <https://zmina.info/news/aktyvistka-iryana-fedoriv-zayavyla-shho-htos-vid-yiyi-imeni-zvernuvsya-do-dbr-zi-skargoyu-na-kolegu-oleksandra-salizhenka/>.

¹⁵⁷ HRMMU, Report On The Human Rights Situation In Ukraine 1 March – 31 May 2024, <https://ukraine.un.org/sites/default/files/2024-07/24-07-03%20OCHR%2039th%20periodic%20report%20on%20Ukraine.pdf>.

Recommendations:

- The Parliament of Ukraine should adopt the new Law on Personal Data Protection to bring legislation in this area in line with the requirements of Convention 108+ and the EU GDPR, as well as to strengthen personal data protection mechanisms as necessary steps towards harmonisation of Ukrainian and EU legislation in this area;
- The Parliament of Ukraine should withdraw Draft Law No. 11031, aimed at introducing a unified system of video monitoring of public security, from consideration in view of the threats to human rights contained in it;
- Authorised bodies should thoroughly investigate privacy violations and take proactive steps to address identified issues, working systematically to improve the overall situation; and
- Authorised state authorities should ensure the protection of data in information, communication, and electronic systems, as well as public electronic registers, while considering the threats posed by the Russian Federation as an aggressor state.

3.8 State Duty to Protect

Overall score per area: **3.7 /7**

Legislation: **4.0 /7**

Practice: **3.4 /7**

Ukraine has a legally guaranteed duty to protect CSOs from third parties. In 2024, the main danger for CSO activists and public figures remains the Russian Federation, which deliberately attacks, persecutes, and tortures Ukrainian human rights defenders, journalists, volunteers, and other individuals considered to be a threat to the occupying authorities. The state's provision of protection to CSOs within Ukraine's territory has also been hampered by Russia's armed aggression. Moreover, the state fails to provide full and timely protection to CSOs at the national level. For instance, there are still restrictive measures on access to banking services for CSOs, particularly for cross-border transactions.

The overall score in this area, as well as the scores for Legislation and Practice, remain the same as in the previous reporting period. In the coming period, recommendations aimed at abolishing the requirement for CSOs to provide information about their UBOs and the need for the specificities of CSOs to be taken into account when implementing measures to combat extremism, terrorism, money laundering, or corruption, remain relevant.

Standard I. The state protects CSOs and CSO-related individuals from interference and attacks.

The protection of CSOs and related persons in instances of violation of their rights by third parties is carried out in accordance with the Civil Code, the Criminal Code, and the Code on Administrative Offences. In practice, related criminal proceedings and court hearings are lengthy. For example, it took four and a half years before the accused in the murder of Artem Myroshnychenko, a military volunteer and public activist from Bakhmut, was convicted and sentenced in 2024.¹⁵⁸ CSO representatives note a dangerous trend of persecution of anti-corruption activists and investigative journalists by law enforcement agencies in Ukraine, in particular in the context of the exposure of corruption in state institutions.^{159, 160} However, experts also state that this state of affairs in government-controlled territory of Ukraine cannot be compared to in previous periods, when violations of activists' rights without further investigation were widespread. There are some reports of public officials using hate speech or stigmatising CSOs (for more information, see Area 6 (*Freedom of Expression*)). However, emergency measures in place due to the war are not used by the state as a pretext to limit CSOs' participation, breach human rights or to sanction critical organisations.

The situation in the territories of Ukraine temporarily occupied by the Russian Federation, where Ukraine cannot take response measures, remains extremely difficult. The arbitrary detention, transfer, deportation, inhuman treatment, torture and extrajudicial killings of Ukrainian civilians, primarily human rights defenders and journalists, by the Russian Federation are an integral part of its war strategy. These actions instil fear among the population, silence truth-tellers, and eliminate civic activists. There are numerous reports of detentions followed by severe fines and imprisonment. In particular, pressure continues to be exerted on members of the Crimean Tatar community. For example, on 14 September 2024, Russia illegally arrested blind activist Oleksandr Sizikov in Crimea and took him to an unknown location.¹⁶¹ On 22 February 2024, the Russian Ministry of Internal Affairs' 'Centre for

¹⁵⁸ Novynarnya, 'The tragedy of Ukrainian Bakhmut': years later, the court sentenced the killers of activist Artem Myroshnychenko. The language was never mentioned', 21.06.2024 (in Ukrainian), <https://novynarnia.com/2024/06/21/amyrosnychenko-vyrok/>.

¹⁵⁹ Ukrainian Helsinki Human Rights Union, 'Representatives of Ukrainian civil society note a dangerous trend in the prosecution of anti-corruption activists and investigative journalists by law enforcement agencies in Ukraine, in particular, in the context of the activities of the Armed Forces of Ukraine and the mobilization campaign', 12.04.2024 (in Ukrainian), <https://www.helsinki.org.ua/articles/vymahaiemo-prypnyty-peresliduvannia-antykoruptsiynykh-aktyvistiv-ta-zhurnalistiv-rozsliduvachiv/>.

¹⁶⁰ ZMINA Human Rights Centre, 'The media movement demands that President Zelenskyy respond to the pressure on independent journalists and investigators', 17.01.2024 (in Ukrainian), https://zmina.ua/statements/mediaruh-vymagaye-vid-prezydenta-zelenskogo-reakcziyi-na-tysk-na-nezaleznyh-zhurnalistiv-ta-rozsliduvachiv/?fbclid=IwZXh0bgNhZW0CMTEAAR0EpQJDxCpl6cFPoZ0feeV8sOGy_6cXkw-vwz45s0J23VNI2R2RURcoL9I_aem_gQGJyySayQ7bgmcl9Q5YA.

¹⁶¹ The Mission of the President of Ukraine in the Autonomous Republic of Crimea, operational report, 'Update on the Situation in the Temporarily Occupied Territory of the Autonomous Republic of Crimea and the City of Sevastopol as of September 16, 2024', 16.09.2024 (in Ukrainian), <https://ppu.gov.ua/en/press-center/operatyvna-informatsiia-shchodo-sytuatsii-na-tymchasovo-okupovaniy-terytorii-avtonomnoi-respubliky-krym-ta-mista-sevastopolia-stanom-na-16-veresnia-2024-roku/>

Combatting Extremism' searched the home of journalist and Crimean Tatar human rights activist Lutfiye Zudiyevaï, detaining her and later charging her with administrative offences.¹⁶² Additional hardship is even being exerted on those already illegally convicted by Russia. For instance, Ukrainian citizen Remzi Bekirov, a journalist and activist for the organisation Crimean Solidarity, who was sentenced to 19 years' imprisonment in 2022 on fabricated terrorism charges, is being held in harsh conditions in a Russian penal colony over 4,500 km from Crimea where he faces systemic mistreatment, including placement in isolation, and restrictions on communication with his family. This violates Bekirov's right to humane treatment and family connections, as protected by international law.¹⁶³ In general, the Ukrainian authorities, domestic organisations and international organisations cite different figures for enforced disappearances, which is explained by the limited access to the occupied territories. The facts themselves are however confirmed in reports, in particular those by the Office of the United Nations High Commissioner for Human Rights.¹⁶⁴

Standard II. Measures used to combat extremism, terrorism, money laundering or corruption are targeted and proportionate, in accordance with a risk-based approach, and respect human rights standards on association, assembly and expression.

The Law on Prevention and Combating the Legalisation (Laundering) of Criminal Proceeds, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction¹⁶⁵ does not contain provisions that restrict or make impossible the legitimate exercise or enjoyment of fundamental freedoms. At the same time, the requirement for CSOs to determine their UBO remains challenging. Despite the methodological recommendations of the Ministry of Justice,¹⁶⁶ CSOs still consider these requirements to be a violation of the guarantee of their right

¹⁶² CrimeaSOS, Statement of human rights organisations regarding the detention of Crimean Tatar human rights defender and journalist Lutfia Zudiyeva, 22.02.2024 (in Ukrainian), <https://krymsos.com/zayava-pravozahysnyh-organizacij-shhodo-zatrymannya-krymskotatarskoyi-pravozahysnyci-ta-zhurnalistky-lutfiye-zudiyevoyi/>.

¹⁶³ CrimeaSOS, Statement by human rights organisations regarding the inhumane conditions of detention of citizen journalist Ramzi Bekirov in the Russian colony, 10.09.2024 (in Ukrainian), <https://krymsos.com/zayava-pravozahysnyh-organizacij-shhodo-nelyudskiyh-umov-trymannya-u-rosijskij-koloniyi-gromadyanskogo-zhurnalista-remzi-bekirova/>.

¹⁶⁴ HRMMU, Report On The Human Rights Situation In Ukraine 1 March – 31 May 2024, <https://ukraine.un.org/sites/default/files/2024-07/24-07-03%20OCHR%2039th%20periodic%20report%20on%20Ukraine.pdf>.

¹⁶⁵ Law of Ukraine on Prevention and Combating the Legalisation (Laundering) of Criminal Proceeds, Terrorist Financing and Financing of the Proliferation of Weapons of Mass Destruction, No. 361-IX, 06.12.2019 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/361-20#Text>.

¹⁶⁶ Ministry of Justice, Guidelines for determining the UBO for public associations and charitable organisations (in Ukrainian), <https://miniust.gov.ua/news/ministry/viznachennya-kintsevogo-benefitsiarnogo-vlasnika-gromadskimi-obednanniyami-ta-blagodiynimi-organizatsiyami>.

to freedom of association.¹⁶⁷ Discussions¹⁶⁸ on the issue of UBOs among civil society and relevant institutions continued throughout 2024. Representatives of CSOs highlight the need to expand the options available for registration of an entity's ownership structure and to define a list of CSOs that are not obligated to determine and disclose their UBO.

Legislative measures aimed at combating money laundering and terrorist financing apply only to CSOs that are deemed high-risk. The level of financial monitoring required depends on the specific banking services and financial products utilised by the CSO.¹⁶⁹ However, in practice, there have been instances in 2024 in which CSOs have received requests for additional documentation to confirm sources of income (such as grant contracts) and to verify the location of individuals registered in temporarily occupied territories (for example, by providing a certificate of registration for IDPs).

The Law on the Prevention of Corruption,¹⁷⁰ the State Anti-Corruption Policy for 2021-2025,¹⁷¹ and the State Anti-Corruption Programme for 2023-2025¹⁷² do not directly relate to the activities of CSOs, as these organisations do not exercise public authority. A specific provision the Law on the Prevention of Corruption states that the subjects of the relevant declaration include representatives of CSOs who are members of competitive and disciplinary commissions formed under the Law on State Service,¹⁷³ the Law on Service in Local Self-Government Bodies,¹⁷⁴ and other relevant laws (excluding non-resident foreigners who are members of such commissions), as well as the Public Integrity Council established in accordance with the Law on the Judiciary and the Status of Judges.¹⁷⁵ These additional requirements cannot be considered 'restrictions or violations of the rights of CSOs', as they pertain to the realisation of their rights specifically as members of competitive or disciplinary

¹⁶⁷ This refers to clause 3 of Article 5 of the Law of Ukraine on Public Associations, which provides that the requirement to indicate information on a person's membership (participation) in a public association, if such a requirement is not related to the exercise of the person's rights as a person entitled to represent a public association or a member (participant) of a public association, is not allowed, except in cases determined by law, (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4572-17#Text>.

¹⁶⁸ CEDEM, Expert discussion 'New requirements for determining the ownership structure of non-profit organisations - clearly about the complex', 24.06.2024 (in Ukrainian), <https://cedem.org.ua/news/struktura-vlasnosti-neprybutkovyh/>.

¹⁶⁹ CEDEM, 'Politically exposed persons in CSOs - what are the risks?' (in Ukrainian), <https://cedem.org.ua/news/pep/>.

¹⁷⁰ Law of Ukraine on the Prevention of Corruption, No. 1700-VII, 14.10.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1700-18#Text>.

¹⁷¹ Law of Ukraine on the Principles of the State Anti-Corruption Policy for 2021-2025, No. 2322-IX, 20.06.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2322-20#Text>.

¹⁷² Resolution of the CMU on Approval of the State Anti-Corruption Program for 2023-2025, No. 220, 04.03.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/220-2023-n#Text>.

¹⁷³ Law of Ukraine on State Service, No. 889-VIII, 10.12. 2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/889-19#Text>.

¹⁷⁴ Law of Ukraine on Service in Local Self-Government Bodies, No. 2493-III, 7.06.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2493-14#Text>.

¹⁷⁵ Law of Ukraine on the Judicial System and the Status of Judge, No. 1402-VIII, 2.06. 2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/card/1402-19>.

commissions. Experts noted¹⁷⁶ that in 2024, the need to introduce declarations for individual representatives of CSOs, particularly those combating corruption, was periodically discussed; however, no draft laws on this matter were registered.

Recommendations:

- The government should abolish the requirement for CSOs to provide information on their UBOs, as CSOs do not generally have percentage-based controlling interests;
- Law enforcement and judicial authorities should facilitate the protection of CSOs and activists in case of violations of their rights through impartial consideration and decision-making within a reasonable time; and
- Financial institutions and banks should ensure that measures taken to combat extremism, terrorism, money laundering or corruption are proportionate, taking into account the specificities of CSOs and the updated relevant guidelines of the European Banking Authority (EBA).

3.9 State Support

Overall score per area: **4.4 / 7**

Legislation: **4.7 / 7**

Practice: **4.0 / 7**

The practice of using state support mechanisms continues, even in the face of limited resources. However, the relevant online platform does not feature active competitions, and funding is distributed through a closed procedure or via competitions organised by specific agencies. There is growing interest in and involvement of non-governmental service providers in the delivery of social services. Meanwhile, the tax environment for CSOs has not changed, and the existing legislative initiatives on tax exemptions have not been considered. At the same time, there are clear signals of efforts to stimulate volunteering, including the development of policy documents, the submission of a number of related draft laws, as well as the continued operation of online platforms and the sustainable work of CSOs in the volunteering sector.

The overall score in this area, as well as the scores for Legislation and Practice, remain the same as in 2023. The recommendation from previous years regarding the approval of a

¹⁷⁶ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

programme document to promote volunteering remains relevant. In 2025, the state should also focus on involving CSO representatives in the selection of priorities for state funding, assist volunteers with their registration and reporting, and consider Draft Law No. 10040, which proposes amendments to the Tax Code to support volunteer activities during martial law.

Standard I. There are a number of different effective mechanisms of financial and material state support for CSOs.

Various mechanisms of state funding are provided by different state bodies at the national and local levels. Experts note¹⁷⁷ that this area is insufficiently developed as an important source for CSO sustainability. The state generally has limited funding for CSOs, particularly those working in certain areas. In 2024, the State Budget of Ukraine¹⁷⁸ allocated UAH 76,925,500 (approx. 1,751,092 EUR) from the general fund for financial support to physical education and sports CSOs. In 2023, support provided in the same category amounted to UAH 41,673,100 (approx. 948,625 EUR) and for youth and children's public organisations, in the amount of UAH 36,605,700 (approx. 833,273 EUR). This indicates a decrease in the financing categories and the total amount of budget funds. Experts note¹⁷⁹ that these funds are still distributed without the involvement of CSOs in the process and that there are no clear procedures for CSO participation in the state funding cycle. There is no available statistical data on the overall expenditure of funds for CSOs from the state budget.

The online 'VzayemoDiia' platform launched in 2021¹⁸⁰ has not contained details of announcements of funding competitions in 2024. However, competitions for financial support have been announced on the websites of the Ukrainian Cultural Foundation,¹⁸¹ the Ukrainian Veterans Fund of the Ministry of Veterans Affairs,¹⁸² and the Ukrainian Youth Foundation.¹⁸³ Also, the Resolution of the CMU No. 262 of 8 March 2024¹⁸⁴ removed the restriction on the Ministry of Veterans Affairs from providing financial support on a competitive basis to CSO projects, which had been introduced in connection with the introduction of martial law in Ukraine.

¹⁷⁷ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

¹⁷⁸ Law of Ukraine on the State Budget of Ukraine for 2024, No. 3460-IX, 09.11.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3460-IX#Text>.

¹⁷⁹ Civil society experts with expertise in relevant areas of the CSO Meter. Data was collected through interviews, consultations and focus groups.

¹⁸⁰ diiia.gov.ua, 'The space of electronic tenders' (in Ukrainian), <https://grants.vzaemo.diiia.gov.ua>.

¹⁸¹ Ukrainian Cultural Foundation, Grant programmes (in Ukrainian), <https://ucf.in.ua/programs>.

¹⁸² Ukrainian Veterans Fund of the Ministry of Veterans Affairs of Ukraine (in Ukrainian), <https://mva.gov.ua/vartogo>.

¹⁸³ Ukrainian Youth Foundation, Grants and programmes (in Ukrainian), <https://uyf.gov.ua/en/programs>

¹⁸⁴ Resolution of the CMU on the approval of the Procedure for the use of funds provided for in the state budget for the implementation of measures to create a positive image of war veterans, the production of certificate forms and badges, the development of the veteran movement, the commemoration of the Defenders of Ukraine, and the recognition of certain resolutions as having lost their validity, No. 263, 8.03.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/263-2024-n%23Text#Text>.

There is a practice of state support for CSOs in cooperation with international organisations. On 11 April 2024, the Ministry of Veterans Affairs, its Ukrainian Veterans Fund and ISAR Ednannia began the implementation of veteran grants under the 'Varto: Unity'¹⁸⁵ competition. A total of three competitions were announced¹⁸⁶ in different areas. For CSOs, state support requires an understanding of the specifics of obtaining state funding (namely, the need to open a treasury account, the procedure for transferring funds, and the burden of reporting).

Standard II. State support to CSOs is regulated by clear and objective criteria and provided through a transparent and competitive procedure.

Resolution of the CMU No. 1049 provides for the procedure for holding a competition of programmes (projects, events) developed by CSOs and implemented with state financial support.¹⁸⁷ In May 2024, the CMU adopted¹⁸⁸ changes that additionally regulate the issue of the competition commission and its activities. These include the possibility of the presence of representatives of the public and the media at its meetings, determining the conditions for the selection of candidates based on the principles of reasonableness and impartiality, and ensuring the broadcast of open defence tender offers of CSOs. According to the rules of tender procedures, authorities must form tender commissions (which may include representatives of CSOs), publicise the results of the tender and indicate the winning projects and the period of activity. These rules have also been applied in practice in 2024. The procedure for submitting an application for state funding is mostly clear and information about the competition and selection conditions is also made public via publication on the institution's website. Information about selection results is usually published on time. Co-financing support with international partners is also carried out according to an open competitive procedure with the selection of members of the expert council.¹⁸⁹

In addition to state funding on a competitive basis, which implies clear rules, state funding on a non-competitive basis is also available. CSOs relating to persons with disabilities (e.g., the Ukrainian Society of the Deaf and the Ukrainian Society of the Blind), veterans' associations (including veterans of the war in Afghanistan, children of war, etc.) and sports CSOs receive

¹⁸⁵ ISAR Ednannia, 'The Ministry of Veterans Affairs, the VWF and ISAR Ednannia have started the implementation of grants for the 'Worth: Unity' contest', 11.04.2024 (in Ukrainian), <https://ednannia.ua/news/nashi-novini/12645-startuvav-konkurs-veteranskikh-grantiv-var-to-ednannya-vid-minveteraniv-ta-isar-ednannya>.

¹⁸⁶ The Ukrainian Veterans Foundation, Competitive programmes for financing veteran business projects <https://veteranfund.com.ua/contests/>.

¹⁸⁷ Resolution of the CMU on the approval of the Procedure for conducting a competition to determine programmes (projects, events) developed by civil society institutes, for the implementation (implementation) of which financial support is provided, No. 1049, 12.10.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1049-2011-n#n15>.

¹⁸⁸ Resolution of the CMU on changes to the Procedure for conducting a competition to determine programmes (projects, activities) developed by civil society institutions, for the implementation (implementation) of which financial support is provided, No. 511, 7.05.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/511-2024-n%23n2#Text>.

¹⁸⁹ The Ukrainian Veterans Foundation, stages of competitive selection 'Varto 11.0', <https://veteranfund.com.ua/contests/var-to-11-0/>.

funding directly from the state without competition. However, experts note that the procedure for providing state financial and material support needs to be improved in the future, in particular through the involvement of CSO representatives in the selection of funding priorities and grant recipients. A positive example is the practice of the Ukrainian Cultural Foundation,¹⁹⁰ a state institution which in October 2024 proposed¹⁹¹ for public discussion a draft of its 'Priority Areas' that determine the Foundation's activities during the next grant season. There have been no reported cases of the state providing state support which has undermined the independence of CSOs or interfered in their activities.

Standard III. CSOs have a favourable tax environment.

The Tax Code provides for favourable tax exemptions for grants, donations, economic activities, endowments and membership fees that support non-profit activities. CSOs in Ukraine can obtain non-profit status through a clear procedure and free of charge. To be registered for and obtain non-profit status, CSOs must submit an application (free of charge) to the supervisory authority at their main place of registration. This status is granted for an indefinite period and exempts CSOs from paying income tax. A CSO may be removed from the Register of Non-Profit Institutions and Organisations at the request of the CSO itself, or on the basis of a decision of the State Tax Service in clearly defined cases. These include the use of income (profits) for purposes other than those specified in the CSO's constituent documents and reorganisation or liquidation of the organisation. In practice, CSOs are not subject to unreasonable deprivation of their non-profit status by state authorities. In addition, there is a possibility for CSOs to apply the tax refund mechanism in which an individual donor can assist a CSO and compensate a certain part of the tax paid (in an amount not exceeding 4 per cent of the amount of their total taxable income of the relevant accounting year). There are also a number of tax exemptions available to CSOs, including humanitarian aid and charitable assistance. There is, however, no available information published by the tax authorities on the use of tax benefits for CSOs in 2024.

Standard IV. Businesses and individuals enjoy tax benefits for their donations to CSOs.

The Law on Charitable Activities and Charitable Organisations¹⁹² and the Tax Code (as amended by Law No. 2120-IX)¹⁹³ provide the possibility of receiving tax benefits, including benefits for benefactors from income tax. The list of expenses eligible for a tax deduction includes the

¹⁹⁰ Ukrainian Cultural Foundation, <https://ucf.in.ua>.

¹⁹¹ Ukrainian Cultural Foundation, 'What will the grant programmes be? Join the discussion of the UKF's Priority Areas of Activity for 2025', 17.10.2024 (in Ukrainian), <https://ucf.in.ua/news/18102024>.

¹⁹² Law of Ukraine on Charitable Activities and Charitable Organizations, No 5073-VI, 05.07.2012 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/5073-17>.

¹⁹³ Law of Ukraine on Amendments to the Tax Code and Other Legislative Acts of Ukraine Regarding the Application of Norms for the Period of Martial Law, No 2120-IX, 15.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2120-20#Text>.

amount of funds or the value of property transferred (donated) by a taxpayer as donations or charitable contributions to non-profit organisations in an amount not exceeding 4 per cent of their total taxable income in the relevant reporting year.¹⁹⁴ Experts note that this option is complicated (it requires the submission of a significant list of documents) and time-consuming. General awareness of such possibilities is also insufficient. Relevant legislative initiatives, namely Draft Law No. 9177¹⁹⁵ (aiming to address the lack of tax incentives for corporate income taxpayers to make charitable donations to CSOs during martial law and to allow business entities to donate 10 per cent of their taxable income to charity) and Draft Law No. 7500¹⁹⁶ (to introduce a mechanism of interest deduction to support non-profit organisations) were not considered in the current reporting period.

Standard V. Legislation and policy encourage volunteering.

Ukrainian legislation has a clear definition of volunteering and of volunteer work. The relevant legislation regulating volunteering in Ukraine is the Law on Volunteering,¹⁹⁷ the Law on Public Associations, the Law on Charitable Activities and Charitable Organisations,¹⁹⁸ the Law on Social Services,¹⁹⁹ the Law on Social Work with Families, Children and Youth,²⁰⁰ and the Law on Amendments to the Tax Code to Promote the Development of Volunteering and Activities of Non-Profit Institutions and Organisations in the Context of the Armed Aggression of the Russian Federation against Ukraine.²⁰¹

Volunteers can carry out their activities in different ways: independently (individual volunteering), through initiative groups (associations of concerned citizens to implement certain charitable tasks), or through CSOs.²⁰² Individual volunteering in Ukraine, where people raise funds to assist both the military and affected civilians, is a unique form of volunteer work that does not have an equivalent in global practices. However, this form of volunteering faces

¹⁹⁴ Tax Code, No. 2755-VI, 02.12.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2755-17#top>.

¹⁹⁵ Draft Law on Amendments to Section XX 'Transitional Provisions' of the Tax Code of Ukraine on Stimulation of Charitable Assistance to Non-Profit Organisations, No 9177, 03.04.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/41686>.

¹⁹⁶ Draft Law on Amendments to the Tax Code of Ukraine (regarding the introduction of a mechanism of interest deduction to support non-profit organisations), No 7500, 28.06.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/39744>.

¹⁹⁷ Law of Ukraine on Volunteer Activity, No. 3236-VI, 19.04.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3236-17#Text>.

¹⁹⁸ Law of Ukraine on Charitable Activities and Charitable Organisations, No. 5073-VI, 05.07.2012 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/5073-17#top>.

¹⁹⁹ Law of Ukraine on Social Services, No. 2671-VIII, 17.01.2019 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2671-19#top>.

²⁰⁰ Law of Ukraine on Social Work with Families, Children and Youth, No. 2558-III, 21.06.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2558-14#top>.

²⁰¹ Law on Amendments to the Tax Code of Ukraine to Promote the Development of Volunteering and the Activities of Non-Profit Institutions and Organisations in the Context of the Armed Aggression of the Russian Federation against Ukraine, No. 2520-IX, 15.08.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2520-20#Text>.

²⁰² Law of Ukraine on Volunteer Activity, No. 3236-VI, 19.04.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3236-17#Text>.

its own challenges, such as the declaration of involved funds and the impossibility of purchasing certain goods for military purposes, due to insufficient outreach by the responsible state authorities, including controlling bodies. All individual volunteers are required to be entered into the Register of Volunteers.²⁰³ An application for inclusion in the Register can be submitted online by an individual.²⁰⁴

In general, the legislation does not impose additional burdens and restrictions on the involvement of volunteers. In 2024, the NBU eased currency restrictions for individual volunteers in terms of purchasing components for unmanned aerial vehicles and thermal protection.²⁰⁵ CMU Resolution No. 604 dating from 2015²⁰⁶ sets out the conditions and procedure for paying one-off financial assistance to volunteers (or their families) in the event of their death, disability due to injury and other circumstances related to volunteering in military conflicts and the context of national defence. Experts note²⁰⁷ that the procedure for providing such assistance is overly complicated, and only the families of deceased volunteers and volunteers who became disabled while assisting the military are eligible for support. Families of deceased volunteers, those who became disabled while providing assistance to civilians, or those who suffered health issues that did not result in a disability are not entitled to state support. The ineffectiveness of this mechanism is further highlighted by the fact that, since the beginning of the full-scale invasion, one-time financial assistance from the state has been provided to only six families of deceased volunteers and to one volunteer who became disabled.²⁰⁸

An important document in the area of volunteerism development is the National Strategy for Promoting Civil Society Development in Ukraine for 2021-2026.²⁰⁹ The National Social Service of Ukraine, as the body authorised to implement the state policy in the field of volunteering,²¹⁰ started preparing in 2024, together with CSOs, the Concept of the State Programme for the

²⁰³ Order of the Ministry of Finance of Ukraine on Approval of the Procedure for the Formation and Maintenance of the Register of Volunteers of the Anti-Terrorist Operation and/or Implementation of Measures to Ensure National Security and Defence, Repulse and Deter the Armed Aggression of the Russian Federation, No. 1089, 30.10.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/z1471-14#Text>.

²⁰⁴ Publication of the Main Department of the State Tax Service in the Dnipropetrovsk region (in Ukrainian), <https://dp.tax.gov.ua/media-ark/news-ark/768157.html>.

²⁰⁵ Resolution of the Board of the National Bank of Ukraine on the operation of the banking system during the period of martial law, No. 18 (cl.14-5), 24.02.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/v0018500-22#top>.

²⁰⁶ Resolution of the CMU on some issues of payment of one-time financial assistance in case of death or disability of a volunteer as a result of injury (contusion, trauma or mutilation) received while providing volunteer assistance in the area of the anti-terrorist operation, hostilities and armed conflict, No. 604, 19.08. 2015 (in Ukrainian), <https://www.kmu.gov.ua/npas/248424084>.

²⁰⁷ Civil society experts with expertise in relevant CSO Meter areas. Data was collected through interviews, consultations, and focus groups.

²⁰⁸ The data was obtained at the request of the CSO from the Ministry of Veterans Affairs, which includes a commission that makes decisions on the provision of assistance.

²⁰⁹ National Strategy for Promoting Civil Society Development in Ukraine for 2021-2026 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/487/2021#Text>.

²¹⁰ Resolution of the CMU on some issues of the National Social Service of Ukraine, No. 783, 26.08.2020 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/783-2020-n#Text>.

Development of Volunteering in Ukraine for the period 2025-2030.²¹¹ The document will be aimed at comprehensive support of the volunteer movement, both at the national level and at the community level, with the aim of creating conditions for the involvement of volunteers in the activities of CSOs and other non-profit organisations.

CSOs face certain obstacles to engaging foreign volunteers. The current legislation provides the right to engage foreigners and stateless persons exclusively to the CSOs listed on the official website of the National Social Service of Ukraine.²¹² Experts note²¹³ that amendments should be made to the Law on Volunteering to remove the requirement for foreigners arriving in Ukraine to carry out volunteer activities to obtain a long-term visa (many foreigners arrive in Ukraine under the visa-free regime),²¹⁴ as well as to simplify the procedure for submitting information about organisations that involve foreign volunteers to the official website of the National Social Service of Ukraine.

The state is considering incentives for volunteering that are used in practice and recognised by various institutions, such as employers and universities. Online platforms for volunteers are continuing to develop in Ukraine, including the Volunteer Platform²¹⁵ and *Palianytsia.Info*.²¹⁶ The Ukrainian Youth Opinion Survey for 2024²¹⁷ shows that the highest percentage of respondents (88 per cent of young people) have heard of such a tool for civic participation as volunteering. Law No. 11159 was initiated in April 2024 to promote the development of volunteering among students.²¹⁸ Its primary purpose is to facilitate the recognition of competencies acquired through volunteering, similar to the recognition of learning outcomes obtained through non-formal and/or informal education. Additionally, it seeks to motivate individuals by offering both moral recognition and material incentives, thereby supporting their educational pursuits through volunteering.

²¹¹ NSSU, Expert Discussion of the Concept of the State Programme for the Development of Volunteering in Ukraine, 09.02.2024 (in Ukrainian), <https://nssu.gov.ua/news/ekspertne-obhovorennia-kontseptsii-derzhavnoi-programy-rozvytku-volonterskoi-diialnosti-v-ukraini>.

²¹² NSSU, Institutions that involve volunteers in their activities to carry out volunteer work in Ukraine (in Ukrainian), <http://195.230.133.141:21133>.

²¹³ Civil society experts with expertise in relevant CSO Meter areas. Data was collected through interviews, consultations, and focus groups.

²¹⁴ ZMINA Human Rights Centre, 'Insurance, benefits and youth engagement: how the state plans to develop volunteering and what else needs to be changed', 20.09.2024 (in Ukrainian), <https://zmina.info/articles/derzhavna-programa-spryannya-rozvytku-volonterstva-yakym-ye-bachennya-ekspertnoyi-spilnoty/>.

²¹⁵ Volunteer Platform (in Ukrainian), <https://platforma.volunteer.country>.

²¹⁶ *Palianytsia.info* (in Ukrainian), <https://palyanytsya.info>.

²¹⁷ The results of a survey of Ukrainian youth conducted from 19 June to 21 July 2024 by the Centre for Analysis and Sociological Research (CISR) of the International Republican Institute (IRI) under the USAID 'Dreaming and Acting' programme (in Ukrainian), <https://mriemotadiemorazom.org/ukrainian-youth-today>.

²¹⁸ Draft Law on Amendments to Certain Legislative Acts of Ukraine on Promoting the Development of Volunteering among Students, No 11159, 09.04.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43945>.

Draft Law No. 10040,²¹⁹ currently under consideration in the Parliament of Ukraine since its introduction in September 2023, proposes changes to tax legislation aimed at creating more favourable conditions for the life and health insurance of volunteers. The Draft Law has still not been submitted to the main committee for consideration and has therefore not been reviewed in its first reading. In 2024, the practice of CSOs not putting insurance cover in place for their volunteers due to additional tax costs is expected to persist. As a result, when accidents involving volunteers occur, CSOs must explore alternative resources and solutions to provide support.

Recommendations:

- The CMU and central executive authorities should ensure the involvement of CSO representatives in the selection of priorities for state funding in a particular calendar year, as well as in the selection of members of the competition commissions for such support, to ensure a transparent and competitive procedure for the provision of state funding;
- The Parliament of Ukraine should adopt the Draft Law on Amendments to the Tax Code on the Support of Volunteer Activities in Martial Law, No. 10040, dated 13 September 2023; and
- The tax authorities and other relevant authorities, including the National Social Service, should assist volunteers, including individual volunteers, in their registration in the Register of Volunteers and in documenting their activities and reporting;
- The CMU, through its authorised bodies, should facilitate the involvement of foreigners in volunteering by changing the visa requirements for their stay in Ukraine, improving the conditions for registration of volunteer organisations that can engage them, and improving the requirements for organisations; and
- The CMU should approve a programme document to promote volunteering and ensure its implementation by engaging CSOs in all stages of its development.

²¹⁹ Draft Law on Amendments to the Tax Code of Ukraine on Support of Volunteer Activities in Martial Law, No. 10040, 13.09.2023 (in Ukrainian), <https://itd.rada.gov.ua/BILLINFO/Bills/Card/42758>.

3.10 State-CSO Cooperation

Overall score per area: **5.3** /7

Legislation: **5.7** /7

Practice: **4.8** /7

In 2024, cooperation between the state and CSOs has continued and, in certain areas, deepened. There is a clear intention to develop an Action Plan for Civil Society Development in Ukraine, with the involvement of CSOs in various formats, including consultations, strategizing, and information gathering via online platforms. Some legislative provisions that impose unjustified restrictions on the activities of advisory bodies, given the current conditions in the country, need to be revised. IDP councils, as advisory bodies, demonstrate their effectiveness at different levels.

The overall score for this area, among the highest in this report, as well as the scores for Legislation and Practice, remain unchanged compared to 2023. The recommendation from the previous report on involving CSOs in post-war recovery has been revised to focus on the participation of CSOs in the development of various programme documents, including those aimed at integrating Ukraine into the EU. In 2025, state authorities should also prioritise the implementation of provisions from new laws that provide tools for strengthening democracy.

Standard I. Government policies promote cooperation with CSOs and their development.

Despite the full-scale invasion, cooperation between CSOs and the state continues in Ukraine. The government remains dedicated to the implementation of the National Strategy for Civil Society Development in Ukraine for 2021-2026²²⁰ and its related Action Plan for 2024.²²¹ In July 2024, the Action Plan was updated following consultations with CSOs, incorporating their suggestions to revise the timelines and content of the planned measures. This included adjustments to the procedure for publishing information about the activities of executive authorities online, aiming to enhance transparency and public access.²²²

In March 2024, an information meeting entitled 'National Strategy for Civil Society Development: Where We Are Now and Where We Are Going Next' was held, which launched the joint work on developing a new Action Plan for the implementation of the National

²²⁰ Decree of the President on the National Strategy for Civil Society Development in Ukraine for 2021-2026, № 487/2021, 27.09.2021 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/487/2021#Text>.

²²¹ Order of the CMU on Approval of the Action Plan until 2024 for the Implementation of the National Strategy for Civil Society Development in Ukraine for 2021-2026, No. 160-p, 4 February 2023 (in Ukrainian) <https://zakon.rada.gov.ua/laws/show/160-2023-p#Text>.

²²² Government portal, 'The government has updated the tasks of the Action Plan until 2024 for the implementation of the National Strategy for Civil Society Development in Ukraine', 19.07.2024 (in Ukrainian), <https://www.kmu.gov.ua/news/uriad-aktualizuvav-zavdannia-planu-zakhodiv-do-2024-roku-shchodo-realizatsii-natsionalnoi-stratehii-spriyannia-rozvytku-hromadianskoho-suspilstva-v-ukraini>.

Strategy.²²³ During April–May 2024, the Secretariat of the CMU held four thematic online discussions of problematic issues that could be resolved by including relevant tasks in the Action Plan.²²⁴ Subsequently, on 31 May, an event entitled ‘The Fifth Element: Strategic Session for a New Action Plan for the Implementation of the National Strategy for Civil Society Development’ was held, during which, based on the results of the four online discussions, prioritisation of tasks for the new Action Plan was carried out by experts.²²⁵ All CSOs were able to join the process, including by filling out an online form.²²⁶ Proposals to the Action Plan were then collected from CSOs in an online format up until 1 July 2024.²²⁷ The preparation of the new Action Plan for consideration by the CMU is scheduled for October–December 2024.

The National Strategy is implemented (in full or in part) with the allocation of appropriate funding and it impacts on public policy. Information on the status of its implementation at both the central and local levels is available, in particular via a government website that publishes details on the implementation²²⁸ of the National Strategy for Civil Society Development in Ukraine for 2021–2026, consolidated reports in a traffic light format that reflects the status of various measures.²²⁹ This information, along with different forms of strategizing, allow for the consideration of feedback during the revision of Action Plans and of the National Strategy itself.

During 2024, the government announced that CSO representatives will be involved in the negotiation process of Ukraine's membership of the EU through participation in consultations

²²³ ISAR Ednannia, ‘We are starting to develop a new action plan for the implementation of the National Strategy for Civil Society Development in Ukraine for 2025–2026’, 18.03.2024 (in Ukrainian), <https://ednannia.ua/news/nashi-novini/12610-rozpochinaemo-rozrobku-novogo-planu-zakhodiv-z-realizatsiji-natsionalnoi-strategiji-spriannya-rozvytku-gromadyanskogo-suspilstva-v-ukrajini-na-2025-2026-roki>.

²²⁴ Government portal, ‘We are starting to develop a new action plan for the implementation of the National Strategy for Civil Society Development in Ukraine for 2025–2026’, 03.05.2024 (in Ukrainian), <https://www.kmu.gov.ua/news/vidbulasia-seriia-onlain-obhovoren-dlia-pidhotovky-novoho-planu-zakhodiv-z-realizatsii-natsionalnoi-strategii-spriannia-rozvytku-hromadianskoho-suspilstva-v-ukraini>.

²²⁵ Government portal, ‘Representatives of the civil society and government sectors were looking for key elements for a new action plan to implement the National Strategy for Civil Society Development in Ukraine’, 03.06.2024 (in Ukrainian), <https://www.kmu.gov.ua/news/predstavnyky-hromadskoho-ta-uridovoho-sektoriv-shukaly-kliuchovi-elementy-dlia-novoho-planu-zakhodiv-z-realizatsii-natsionalnoi-strategii-spriannia-rozvytku-hromadianskoho-suspilstva-v-ukraini>.

²²⁶ Online form, ‘Join the preparation of the action plan for the implementation in 2025–2026 of the National Strategy for Civil Society Development in Ukraine for 2021–2026’ (in Ukrainian), https://docs.google.com/forms/d/1qtv3uhz7YyigAO7G3itpHbOLzjw0C_839bZw79IM8KE/viewform?edit_requeste_d=true.

²²⁷ Questionnaire for collecting feedback and suggestions based on the results of online discussions and the strategic session during the preparation of the new action plan for the implementation of the National Strategy for Civil Society Development, <https://docs.google.com/forms/d/e/1FAIpQLSfs9hVW4mNBdmGbkLQD--TW-Fr3FZ6xQ5k4VbSxUJDSRGQ7oA/viewform>.

²²⁸ CMU, Information on the status of implementation of the action plan until 2024 for the implementation of the National Strategy for Civil Society Development in Ukraine for 2021–2026 (in Ukrainian), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spriannia/info_20240701.pdf.

²²⁹ CMU, Information on the status of implementation of the action plan until 2024 for the implementation of the National Strategy for Civil Society Development in Ukraine for 2021–2026, approved by the CMU on 14 February 2023 No 160 in the traffic light format (in Ukrainian), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spriannia/info_svitlofor_20240401.pdf.

at the national level.²³⁰ CSOs were also regularly involved in the activities of the Coordination Headquarters for Ensuring the Rights and Freedoms of IDPs and the Coordination Headquarters for the De-occupied Territories, both chaired by the Vice Prime Minister of Ukraine (Minister for Reintegration of the Temporarily Occupied Territories).^{231, 232}

Standard II. The state has special tangible mechanisms to support cooperation with CSOs.

At the legislative level, the participation of CSOs in the development and implementation of state policy through public councils and other advisory bodies is envisioned. This primarily refers to CMU Resolution No. 996 on Ensuring Public Participation in the Formation and Implementation of State Policy.²³³ The Law on Amendments to the Law on Local Self-Government and other legislative acts concerning democracy at the local self-government level,²³⁴ which, as of October 2024, was awaiting signing into law by the President, could enhance the use of participatory tools (such as petitions, general meetings, participatory budgeting, and local initiatives). The Law will provide detailed regulations for each tool and the procedures for its application.

Public councils are established and operate at the national, regional and local levels. In 2024, the number of councils for IDPs²³⁵ amounted to approximately 1,000 councils (compared to around 500 councils in 2023).²³⁶ Provisions remain in force stipulating that public councils will not be reorganised and that information about them may not be posted on official websites during the period of martial law and in the six months following its end.

²³⁰ On the involvement of civil society representatives in the negotiation process (in Ukrainian),

https://drive.google.com/file/d/1qA3yYCBZf-dZTh0TpjA_mDgDtis-ac3F/view?fbclid=IwY2xjawFc3N5leHRuA2FlbQlxMAABHaA_ZBp-SDbrQHcBBFSEppT-QESJZC7cw4DDVVSp2XN36xArMLYb4ldAcg_aem_ezm9SrfJ8hQga_EETO_tww.

²³¹ Resolution of the CMU on the Establishment of the Coordination Headquarters for Ensuring the Rights and Freedoms of Internally Displaced Persons, No. 330, 18.04.2023 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/330-2023-n#Text>.

²³² Resolution of the CMU on the Establishment of the Coordination Headquarters for the De-occupied Territories, No. 1021, 10.10.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1021-2022-n#Text>.

²³³ Resolution of the CMU on Ensuring Public Participation in the Formation and Implementation of State Policy, No. 996, 03.11.2010 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/996-2010-n#Text>.

²³⁴ Draft Law on Amendments to the Law of Ukraine 'On Local Self-Government in Ukraine' and other legislative acts of Ukraine on people's power at the level of local self-government, No 7283, 13.04.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/39362>.

²³⁵ Resolution of the CMU on Approval of the Model Regulation on the Council for Internally Displaced Persons, No. 812, 04.08.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/812-2023-n#Text>.

²³⁶ Interactive map of the Councils on Internally Displaced Persons (in Ukrainian),

<https://www.google.com/maps/d/viewer?mid=16U89yrKy-JK8Ngp6SJKkMM0RknpPG3E&femb=1&ll=48.285106257078496%2C30.87953290400438&z=5>.

Despite the fact that the selection criteria for CSOs to participate in advisory bodies are mostly clear and objective in law, experts have mentioned that, in practice, the selection process may contain significant violations. These include the process being conducted in a short time frame which does not allow enough time for candidates to prepare and submit applications and there being no transparent information available about the selection process. In 2024, this practice has continued, as members of public councils have remained unchanged for long periods of time (in some cases, for more than five years) and the duties of their members are not clear. On the positive side, there are examples of the decisions of various advisory bodies being taken into account when developing policies. For example, the Coordination Headquarters for Ensuring the Rights and Freedoms of IDPs includes the heads of IDP councils at various levels who can provide their expert opinions and suggest solutions. The influence of public councils and other advisory bodies on local decision-making varies depending on the specific community.

Recommendations:

- The CMU and other bodies of central executive power should ensure the continued participation of CSOs in the development of programme documents, including those aimed at integrating Ukraine into the EU. Particular attention should be given to involving CSOs whose main activities are conducted at the local level, as well as those displaced from temporarily occupied territories; and
- State authorities and local self-government bodies at various levels should facilitate the implementation of the provisions of the Law on Amendments to the Law on Local Self-Government in Ukraine and Other Legislative Acts Concerning Democracy at the Local Self-Government Level (after its signing by the President of Ukraine). This Law, in particular, outlines the procedures for using tools of local democracy.

3.11 Digital Rights

Overall score per area: **4.8** /7

Legislation: **5.1** /7

Practice: **4.4** /7

Despite the restrictions on digital rights caused by the legal regime of martial law, Ukraine continues to take all necessary measures to protect digital rights and to create conditions for their realisation. The Law on Digital Content and Digital Services has now come into force. The Parliament of Ukraine has also begun the process of developing a new version of the

Draft Law on the Regulation of Information-Sharing Platforms that Disseminate Mass Information, in line with the EU's Digital Services Act (DSA). Certain aspects of digital rights are also regulated by the Law on Media. The Russian Federation, as an aggressor state, continues to carry out targeted cyberattacks, including phishing with malware. Challenges also arise due to the peculiarities of regulating digital services, including being under the jurisdiction of other countries and the policies of private companies. Digitalisation remains a government priority and continues to grow in importance. The Ministry of Digital Transformation is working to ensure access to fourth-generation (4G) mobile communications. Despite the ongoing shelling of Ukraine's energy infrastructure, communications and internet services are still being provided.

The overall score for this area, as well as the scores for Legislation and Practice, remain unchanged from 2023. The recommendations from the previous report on upgrading legislation related to the use of artificial intelligence (AI) and promoting the further development of digital services and technologies in Ukraine remain relevant. The state should also regulate access to online information resources and establish clear guidelines for their prohibition.

Standard I. Digital rights are protected and digital technologies comply with human rights standards.

Dedicated legislation governing digital rights in Ukraine is still evolving and there is not a single, comprehensive law or regulation that fully regulates this issue. In March 2024, the Law on Digital Content and Digital Services came into force.²³⁷ This Law regulates the relationship between the provider and the consumer regarding the provision of digital content and/or a digital service. There is no information available on the involvement of CSOs in the drafting of the text of the Law. Restrictions on the exercise of certain digital rights, including freedom of expression and privacy, continue to be imposed due to martial law.

Ukrainian citizens' access to the internet and internet resources is practically unrestricted, with the exception of access to Russian services and resources. To enhance security for government personnel, a decision was taken to ban the installation and use of the *Telegram* messaging app on official devices of government officials, military personnel, employees in the security and defence sectors, and those working in critical infrastructure.²³⁸ The primary reason for the ban is that *Telegram* is actively used by the Russian Federation for cyber operations, including phishing attacks, malware distribution, geolocation tracking, and missile targeting.

Certain aspects of digital rights are regulated by the Law on Media. In August 2024, Draft Law No. 11492²³⁹ was registered to ban the use of software and access to electronic information

²³⁷ Law of Ukraine on Digital Content and Digital Services, No. 3321-IX, 10.08.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3321-20#Text>.

²³⁸ Facebook post, 'The National Security Council has decided to restrict the use of Telegram in government bodies, military formations, and critical infrastructure', 20.09.2024 (in Ukrainian), https://www.facebook.com/story.php?story_fbid=844792274498158&id=100069021795806&rdid=QhUeDuAoKecO0fIK.

²³⁹ Law of Ukraine on Amendments to the Law of Ukraine on Sanctions, No 11492, 19.08.2024 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/44743>.

resources. It aims to address a legislative gap by introducing a ban on access to electronic information resources on the internet (webpages, websites, other web resources), electronic communication networks, electronic communication systems, and information systems. Despite the definition of legal grounds for blocking websites through sanctions, the issue of proportionality and necessity remains unclear, leaving the mechanism for imposing sanctions open to interpretation. The Draft Law is currently under consideration. In addition, Draft Law No. 11155²⁴⁰ was registered to regulate the activities of online platforms through which users disseminate information and share content. After discussing its content, the Committee of Parliament decided to develop a new version of the Draft Law in line with the EU's Digital Services Act (DSA), which was to be registered at the end of September 2024.²⁴¹ This will allow CSOs to participate in the development of a comprehensive draft law.

The Criminal Code²⁴² establishes penalties for extremism, separatism or terrorism, including online. However, national legislation is imperfect in terms of prosecuting digital rights offences. This is primarily due to the fact that such violations typically involve tangible components, such as leakage, loss, forgery, blocking of information, distortion of the information processing, process or violation of the established procedure for its routing, etc. The problem is also complicated by the very nature of violations on the internet which can be cross-border and therefore outside the jurisdiction of the state of Ukraine. Difficulties also arise from the policies of certain online platforms, particularly social media (such as content moderation), and also the absence of a mechanism to enforce EU requirements in non-member states, mainly due to the lack of possibility of prosecution.

There has been an unprecedented increase in cyberattacks against CSOs by Russian actors, including targeted phishing malware and attacks on the websites of independent media outlets. For example, Russia attacked the satellite broadcasting of *Espresso TV* and tried to substitute the channel's signal with a broadcast of a parade in Moscow. Hromadske Radio has also been combatting distributed denial-of-service (DDoS) attacks throughout 2024 that began on 12 May.²⁴³ Despite the scope of this report not covering the digital rights of civilians in the temporarily occupied territories, there is evidence, including information obtained from in-depth interviews, of restrictions on access to resources,²⁴⁴ blocking of social media and individual pages, and illegal detentions related to publications and messages on social media.

²⁴⁰ Draft Law on Amendments to Some Laws of Ukraine Regarding the Regulation of the Activities of Information Sharing Platforms Through Which Mass Information is Disseminated, No 11115, 25.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43884>.

²⁴¹ Digital Security Lab, Media and digital rights regulation in Ukraine, digest #14, August 2024, <https://dslua.org/wp-content/uploads/2024/09/Digest-14-August-2024.pdf>.

²⁴² Criminal Code, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

²⁴³ IMI, Freedom of speech barometer for May 2024, <https://imi.org.ua/en/monitorings/freedom-of-speech-barometer-for-may-2024-i61850>

²⁴⁴ CEPA, 'Russia's Window on the World Is Now Closing', <https://cepa.org/article/russias-window-on-the-world-is-now-closing/>.

Standard II. The state creates conditions for the exercise of digital rights.

Access to the internet is widespread in Ukraine, with 4G mobile technologies actively in use. 5G technology is being tested,²⁴⁵ however, the technology is not applied throughout the whole country. In accordance with the priorities of the Work Plan of the Ministry of Digital Transformation²⁴⁶ in 2024, it is planned to provide 91 per cent of the population with access to 4G mobile communications and 90 per cent of the population with high-speed internet. Digitalisation will continue to be a priority for the state, in particular through the development of digital services and technologies, cyber defence, and robotics.

Ukraine was highly ranked – in fifth place – in the Online Service Index for 2024, which is part of the UN's E-Government Development Index, an international study of 193 countries.²⁴⁷ Despite the fact that by many indicators Ukraine significantly exceeds the global average in key telecommunications and internet indicators, Russia's armed aggression has significantly affected the digital infrastructure in Ukraine. The energy and communications sectors are under constant attack.^{248, 249} The total cost of damage to the sector is estimated at USD 2.1 billion. This figure includes revenue losses due to disruptions to postal services and mobile and fixed-line internet services, as well as increased costs for backup power generators needed to keep internet services running. The total cost of rehabilitation and reconstruction in the sector is estimated at USD 4.67 billion over ten years.²⁵⁰

In Ukraine, the regulation of AI is actively developing,²⁵¹ primarily due to its widespread use in the public sector, including the military. As the EU AI Act was adopted in 2024, Ukrainian institutions and civil society are considering how the overall regulatory framework related to AI will be adapted in Ukraine, considering the lack of access to the European institutions which

²⁴⁵ Suspilne Media, 'In Ukraine, 5G technology was launched in test mode for the first time. It is currently being tested by the telecommunications company Vodafone' (in Ukrainian), <https://suspilne.media/754951-v-ukraini-vperse-v-testovomu-rezimi-zapustili-5g-fedorov/>.

²⁴⁶ Work plan of the Ministry of Digital Transformation of Ukraine for 2024 (in Ukrainian),

https://cms.thedigital.gov.ua/storage/uploads/files/page/ministry/План_роботи_МЦ_2024_compressed.pdf.

²⁴⁷ Ministry of Digital Transformation of Ukraine, 'Ukraine ranked 5th in the UN Global Online Service Index' (in Ukrainian), <https://thedigital.gov.ua/news/ukraina-posila-5-te-mistse-za-indeksom-onlayn-servisiv-u-globalnomu-reytingu-oo>.

²⁴⁸ Educational House of Human Rights Chernihiv, 'Urgent appeal of the Coalition 'Ukraine. Five in the Morning' Coalition on the massive shelling of critical infrastructure in Ukraine on 22 March 2024', 22.03.2024 <https://ehrh.org/terminove-zvernennya-koalicziyi-ukrayina-pyata-ranku-shhodo-masovanyh-obstriliv-obyektiv-krytychnoyi-infrastruktury-ukrayiny-22-berezhnya-2024-roku/>.

²⁴⁹ Facebook page, 'Statement of the Coalition 'Ukraine. Five in the Morning' Coalition statement on the Russian missile attack on medical facilities and civilian infrastructure', <https://www.facebook.com/Ukraine.5am/posts/pfbid02CEKYsX8jBxSK9mnvsBF1LNT7c6CX3nr8J1nRi89DswsM6cm3JMQtZ8sLLCF2Z9ivl>.

²⁵⁰ International Telecommunication Union, 'Update on the implementation of ITU Council Resolution 1408 on assistance and support to Ukraine for rebuilding their telecommunication sector', <https://www.itu.int/md/S24-CL-C-0068/en>.

²⁵¹ CEDEM, 'From loud statements to practice: the realities of artificial intelligence regulation', 7.06.2024 (in Ukrainian), <https://cedem.org.ua/analytics/regulyvannya-shtuchnogo-intelektu/>.

have important roles under the EU AI Act.²⁵² Nevertheless, expert discussions are ongoing, initiated in particular by CSOs,²⁵³ and a set of recommendations for the responsible use of AI in the media sector have been developed by Digital Security Lab Ukraine.²⁵⁴

Recommendations:

- The Parliament of Ukraine, with the involvement of a wide range of stakeholders, including CSOs, should adopt amendments to the legislation on access to electronic information resources on the internet and their prohibition, taking into account and consulting on EU standards;
- The CMU should promote the further development of digital services and technologies in Ukraine with participation from civil society and, together with international partners, restore destroyed/damaged infrastructure;
- The CMU, through its authorised bodies, should introduce special legislation on the use of AI and upgrade current legislation on digital rights in accordance with international standards and with due regard for human rights; and
- The Parliament of Ukraine, the CMU, and central authorities should ensure discussions in the format of dialogue with a wide range of stakeholders on ensuring that digital rights are in line with human rights standards.

²⁵² Digital Security Lab Ukraine, 'Actions and Dreams: Artificial Intelligence in the Public Sector: Analytical study' (in Ukrainian), https://dslua.org/wp-content/uploads/2024/02/Mrii_ta_dii_kopiiia.pdf.

²⁵³ Digital Security Lab Ukraine, 'Digital Lab held an expert discussion on the use of AI in the public sector' (in Ukrainian), <https://dslua.org/publications/tsyfrolaba-provela-ekspertnu-dyskusiiu-z-pytan-vykorystannia-shi-v-publichnomu-sektori/>.

²⁵⁴ Digital Security Lab Ukraine, 'Recommendations for the responsible use of artificial intelligence in the media' (in Ukrainian), https://dslua.org/wp-content/uploads/2024/01/Rekomendatsii_SHI_media.docx.pdf.

IV. KEY PRIORITIES

Russian armed aggression against Ukraine continues to severely impact Ukrainian civil society. The situation also affects the possibility of the state and civil society to engage in working towards important reforms and improvements in all 11 areas of the CSO Meter. However, efforts to counter Russian aggression and Ukraine's EU integration strengthen CSOs' resolve to implement systemic changes.

The overall CSO environment score in Ukraine in 2024 remained the same as in 2023. Only one area saw an increase in its overall score: Area 5 (*Right to Participation in Decision-Making*). This resulted from adopting several laws, including the Law on Ensuring Transparency of Local Self-Government and the Law on Public Consultations. While this legislation is aimed at improving access to local democracy tools and the overall process of decision-making, its implementation requires further measures.

In the current reporting period, the majority of the key recommendations in the 2023 CSO Meter country report for Ukraine noted progress. The recommendations were related to the adoption of supportive legislation to promote democracy and public consultations, the introduction of various fundraising mechanisms (including with the support of ISAR Ednannia), and continuing the implementation of the Action Plan for the National Strategy for Civil Society Development (2021-2026).

In light of the above, for 2024, the following seven recommendations out of a total of 41 recommendations in 11 areas have been identified as key priorities for the coming period:

1. The CMU, the Ministry of Digital Transformation, and the Ministry of Justice should ensure that CSO registration services are provided through the online 'Diia' portal, similar to those provided to businesses;
2. The Parliament of Ukraine should review the provisions of the Law on Public Consultations that provide that it will not enter into force until one year after the end of martial law and define the obligation of MPs to hold public consultations;
3. The CMU and other bodies of central executive power should ensure the continued participation of CSOs in the development of programme documents, including those aimed at integrating Ukraine into the EU. Particular attention should be given to involving CSOs whose main activities are conducted at the local level, as well as those displaced from temporarily occupied territories;
4. The CMU, through its authorised bodies, should ensure that public procurement procedures involving CSOs are taken into account and promote broad information on CSOs' access to public procurement;
5. The NBU should facilitate CSOs' access to banking services on an equal footing with businesses, including cross-border transactions and lending. It should also ensure communication with international financial institutions, including FATF, and foreign banks to mitigate restrictions caused by armed aggression;

6. Law enforcement, including the Prosecutor General's Office, should continue investigating and documenting Russian crimes against CSO representatives and the media to hold Russia accountable; and
7. The Parliament of Ukraine should adopt the Draft Law on Amendments to the Tax Code on the Support of Volunteer Activities in Martial Law No. 10040 dated 13 September 2023.

V. METHODOLOGY

The CSO Meter project conducts regular and consistent monitoring of the environment in which CSOs operate in the Eastern Partnership (EaP) countries. It consists of a set of standards and indicators in 11 different areas to assess both Legislation and Practice. It is based on international standards and best practices. The CSO Meter was developed by a core group of experts from ECNL and local partners from the six EaP countries.

The country partners, together with other CSOs that are part of the CSO Meter Hub, conducted the monitoring process and prepared a draft country report. They have also established advisory boards in each country, consisting of expert representatives of key local stakeholders. The members of the advisory boards have two main tasks: to review the narrative reports and to score each standard based on the narrative reports.

This country report covers the period from January to November 2024.

Monitoring process

The process involved data collection and analysis. The main methods used in this report were desk research, as well as seven in-depth interviews and two consultations, two focus group discussions with representatives of local CSOs (7 participants) and national CSOs (7 participants). The report draws on ISAR Ednannia's broader work supporting CSOs in Ukraine and input from colleagues.

This report was developed with the contribution of an Advisory Board that consisted of representatives of key local stakeholders (independent experts and representatives of CSOs) to ensure that the findings and recommendations reflect the overall situation in the country:

- Public Association 'Reanimation Package of Reforms Coalition';
- The International Renaissance Foundation / Open Society Institute;
- Centre of Policy and Legal Reform;
- Centre for Civil Liberties;
- Public Association 'Razom Proty Koruptcii';
- Ukrainian Helsinki Human Rights Union;
- International Charitable Organization 'Environment-People-Law'; and
- NGO 'Donbas SOS'.

The draft narrative country report was reviewed by the Advisory Board members at an online meeting held on 29 October 2024. Based on the recommendations of the Advisory Board members, the findings and recommendations were finalised.

Scoring process

Country researchers and 10 members of the Advisory Board in Ukraine assessed the Standards of the 11 areas of the CSO Meter tool in Legislation and Practice which noted significant changes compared to the previous year's report. The final score for each standard was then calculated using a formula in which the researchers' score is weighted at 50 per cent and the average score of the Advisory Board members is weighted at 50 per cent. The score for each area is then calculated as the average of the final scores for each standard and is calculated and rounded to one decimal place for presentation purposes. As a rule, a seven-point scale is used for the scoring procedure. The extreme values of the scale are understood as the most extreme or ideal situation or environment. For example, (1) is an extremely unfavourable (authoritarian) environment and (7) is an extremely favourable (ideal democratic) environment for CSOs.

For more information about the CSO meter, the assessment process and scoring, please see: <https://csometer.info/>.

VI. REFERENCES

LEGISLATION

- Universal Declaration of Human Rights (1948),
https://zakon.rada.gov.ua/laws/show/995_015#Text.
- United Nations. International Covenant on Civil and Political Rights,
<https://treaties.un.org/doc/Publication/CN/2022/CN.65.2022-Eng.pdf>.
- European Convention on Human Rights (1953),
https://www.echr.coe.int/Documents/Convention_ENG.pdf.
- Resolution 1408 - Assistance and support to Ukraine for rebuilding their telecommunication sector,
<https://www.itu.int/md/S22-CL-C-0095/en>.
- Update on the implementation of ITU Council Resolution 1408 on assistance and support to Ukraine for rebuilding their telecommunication sector,
<https://www.itu.int/md/S24-CL-C-0068/en>.
- Constitution of Ukraine (in Ukrainian),
<https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>.
- Civil Code of Ukraine, No 435-IV , 16.01.2003 (in Ukrainian),
<https://zakon.rada.gov.ua/laws/show/435-15>.
- Criminal Code of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/234I-14#Text>.
- Criminal Procedure Code of Ukraine (in Ukrainian),
<https://zakon.rada.gov.ua/laws/show/465I-17#Text>.
- Tax Code of Ukraine (in Ukrainian),
<https://zakon.rada.gov.ua/laws/show/2755-17#n12538>.
- Decree of the President on Martial Law, No. 64/2022, 24.02.2022 (in Ukrainian),
<https://zakon.rada.gov.ua/laws/show/64/2022#top>.

- Law of Ukraine on Public Associations, No. 4572-VI, 22.03.2012 last amended 27.04.2021 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4572-17#Text>.
- Law of Ukraine on Charitable Activities and Charitable Organizations, No 5073-VI, 05.07.2012 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/5073-17>.
- Law of Ukraine on State Registration of Legal Entities, Individual Entrepreneurs and Public Association, No. 755-IV, 15.05.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/755-15#Text>.
- Law of Ukraine on Financial Mechanisms for Stimulating Export Activity, No. 1792-VIII, 20.12.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1792-19#Text>.
- Law of Ukraine on Personal Data Protection, No. 2297-VI, 01.06.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2297-17>.
- Law of Ukraine on Operational and Investigative Activities, No. 2135-XII, 18.02.1992 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2135-12#Text>.
- Law of Ukraine on the Prohibition of Propaganda of the Russian Nazi Totalitarian Regime, the Armed Aggression of the Russian Federation as a Terrorist State Against Ukraine, and the Symbols of the Military Invasion of Ukraine by the Russian Nazi Totalitarian Regime, No. 2265-IX, 22.05.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2265-20#Text>.
- Law of Ukraine on Amendments to Certain Legislative Acts of Ukraine on Strengthening Criminal Liability for Production and Distribution of Prohibited Information Products, No. 2110-IX, 03.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2110-20#Text>.
- Law of Ukraine on Amendments to the Criminal Code and the Code of Criminal Procedure of Ukraine to Ensure Counteraction to Unauthorized Dissemination of Information on the Sending, Movement of Weapons, Armaments and Ammunition to Ukraine, Movement, Disposition or Deployment of the Armed Forces of Ukraine or Other Military Formations Formed in Accordance with the Laws of Ukraine Committed in Conditions of Martial Law or State of Emergency, No. 2160-IX, 24.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2160-20#Text>.
- Law of Ukraine on Amendments to the Criminal Procedure Code of Ukraine and the Law of Ukraine on Electronic Communications to Improve the Effectiveness of Pre-trial Investigation in Hot Tracks and Counteract Cyber Attacks, No. 2137-IX, 15.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2137-20#Text>.
- Law of Ukraine on Electronic Communications (in Ukrainian), No. 1089-IX, 16.12.2020, <https://zakon.rada.gov.ua/laws/show/1089-20#Text>.

- Law of Ukraine on The Legal Regime of Martial Law, No. 389-VIII, 12.05.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/389-19#Text>.
- Law of Ukraine on Amendments to the Tax Code and Other Legislative Acts of Ukraine Regarding the Application of Norms for the Period of Martial Law, No 2120-IX, 15.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2120-20#Text>.
- Law of Ukraine on State Support of Mass Media and Professional Protection of Journalists, №540/97-BP, 23.09.1997 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/540/97-%D0%B2%D1%80>.
- Law of Ukraine on Amendments to the Law of Ukraine on Volunteering Regarding Support of Volunteering, 15.08.2022 No. 2519-IX (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2519-20#Text>.
- Law of Ukraine on the National Guard of Ukraine, No. 876-VII, 13.03.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/876-18#top>.
- Law of Ukraine on Local Self-Government in Ukraine, No. 280/97-BP, 21.05.1997(in Ukrainian), <https://zakon.rada.gov.ua/laws/show/280/97-bp#Text>.
- Law of Ukraine on Payment Services, No. 1591-IX, 15.11.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1591-20#Text>.
- Law of Ukraine on Access to Public Information, No. 2939-VI, 13.01.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2939-17#Text>.
- Law of Ukraine on Lobbying, No. 3606-IX, 23.02.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3606-20#Text>.
- Law of Ukraine on Public Procurement, No. 922-VIII, 25.12.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/922-19#Text>.
- Law of Ukraine on the National Police, No. 580-VIII, 02.07.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/580-19#top>.
- Law of Ukraine on Information, No. 2657-XII, 02.10.1992 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2657-12#Text>.
- Law of Ukraine on the State Budget of Ukraine for 2024, No. 3460-IX, 09.11.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3460-IX#Text>.

- Law of Ukraine on the Protection of the Interests of Subjects Submitting Reports and Other Documents During the Period of Martial Law or a State of War, No. 2436-IX, 03.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2115-20#Text>.
- Law of Ukraine on the Introduction of Amendments to Some Laws of Ukraine Regarding the Provision of an Additional Guarantee of Protection to Media Workers Who Work in the Areas of Military (combat) Operations and/or in the Temporarily Occupied Territories of Ukraine (in Ukrainian), No. 2382-IX, 08.07.2022, <https://zakon.rada.gov.ua/laws/show/2382-20#Text>.
- Law on Amendments to the Tax Code of Ukraine to Promote the Development of Volunteering and the Activities of Non-Profit Institutions and Organisations in the Context of the Armed Aggression of the Russian Federation against Ukraine, No. 2520-IX, 15.08.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2520-20#Text>.
- Law on Amendments to the Tax Code of Ukraine and Other Legislative Acts of Ukraine Regarding the Peculiarities of Taxation and Reporting During the Period Martial Law, No. 2118-IX, 03.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2118-20#Text>.
- Law of Ukraine on the introduction of changes to some legislative acts of Ukraine regarding ensuring the liability of persons who carried out collaborative activities, No. 2107-IX, 03.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2107-20#top>.
- Law of Ukraine on Amendments to Certain Legislative Acts of Ukraine Regarding the Regulation of Activities of Separate Subdivisions of a Legal Entity Established in Accordance with the Law of a Foreign State, No. 3257-IX, 14.07.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3257-20#Text>.
- Law of Ukraine on the Principles of State Regulatory Policy in the Area of Economic Activity, No. 1160-IV, 11.09.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/card/1160-15>.
- Law of Ukraine on Amendments to the Law of Ukraine on Local Self-Government in Ukraine to Ensure Transparency of Local Self-Government, No. 3590-IX, 22.02.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3590-20#Text>.
- Law of Ukraine on Counterintelligence Activities, No. 374-IV, 26.12.2002 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/374-15>.
- Law of Ukraine on Social Work with Families, Children and Youth, No. 2558-III, 21.06.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2558-14#top>.

- Law of Ukraine on Digital Content and Digital Services, No. 3321-IX, 10.08.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3321-20#Text>.
- Draft Law on Amendments to Certain Laws of Ukraine on the Regulation of Activities and State Registration of Public Organisations, No. 8084, 28.09.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/40561>.
- Draft Law on Special Missions of Ukraine, No. 11103, 20.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43873>.
- Draft Law on Amendments to the Criminal Code of Ukraine to Establish Liability for Misappropriation of State Functions, No. 11104, 20.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43874>.
- Draft Law on Amendments to the Law of Ukraine on the Purification of Power (to prevent external influence on the interests of the state), No. 3326, 13.04.2020, (in Ukrainian), http://wi.ci.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=68576.
- Draft Law on Amendments to the Tax Code of Ukraine and Other Legislative Acts of Ukraine Concerning the Regulation of the Turnover of Virtual Assets in Ukraine, No. 10225-1 від 17.11.2023, <https://itd.rada.gov.ua/billInfo/Bills/Card/43232>.
- Draft Law on Amendments to Certain Legislative Acts of Ukraine (regarding transparency of activities of public associations with foreign support), No 3564, 29.05.2020 (in Ukrainian), http://wi.ci.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=68977.
- Draft Law on Amendments to Certain Laws of Ukraine Concerning the Prohibition of Financing of Government Bodies and their Officials From Abroad and the Prohibition of the Highest Officials of the State Having Citizenship of a Foreign State, No. 3572, 02.06.2020 (in Ukrainian), http://wi.ci.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=68997.
- Draft Law on Amendments to the Law of Ukraine 'On Local Self-Government in Ukraine' and other legislative acts of Ukraine on people's power at the level of local self-government, No. 7283, 13.04.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/39362>.
- Draft Law on Public Consultations, No. 4254, 23.10.2020 (in Ukrainian), http://wi.ci.rada.gov.ua/pls/zweb2/webproc4_1?pf3511=70235.

- Draft Law on Amendments to Certain Laws of Ukraine on Preventing the Disclosure of Certain Information in the Texts of Court Decisions, No. 7033-d, 03.01.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/41159>.
- Draft Law on Personal Data Protection, No. 8153, 25.10. 2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/40707>.
- Draft Law on Amendments to the Criminal and Criminal Procedure Codes of Ukraine, Other Legislative Acts of Ukraine on the Regulation of Issues of Countering Intelligence and Subversive Activities of Special Services of Foreign States, No. 11228, 30.04.2024, (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/44125>.
- Draft Law on Amendments to the Criminal and Criminal Procedure Codes of Ukraine, Other Legislative Acts of Ukraine on the Regulation of Issues of Countering Intelligence and Subversive Activities of Special Services of Foreign States, No 11228-1, 10.05.2024, (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/44187>.
- Draft Law on a Unified System of Video Monitoring of Public Security, No. 11031, 20.02.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43733>.
- Draft Law on Amendments to Section XX ‘Transitional Provisions’ of the Tax Code of Ukraine on Stimulation of Charitable Assistance to Non-Profit Organisations, No. 9177, 03.04.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/41686>.
- Draft Law on Amendments to the Tax Code of Ukraine (regarding the introduction of a mechanism of interest deduction to support non-profit organisations), No. 7500, 28.06.2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/39744>.
- Draft Law on Amendments to Certain Legislative Acts of Ukraine on Promoting the Development of Volunteering among Students, No. 11159, 09.04.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43945>.
- Draft Law on Amendments to the Law of Ukraine on Bodies of Self-Organisation of the Population regarding the improvement of the procedure for the organisation, activities and termination of a body of self-organisation of the population, No. 6319, 18.11.2021 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/28346>.
- Order of the CMU on Approval of the Action Plan until 2024 for the Implementation of the National Strategy for Civil Society Development in Ukraine for 2021-2026, No. 160-p, 04.02. 2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/160-2023-p#n8>.

- Order of the CMU on Amendments to the Action Plan until 2024 for the Implementation of the National Strategy for Civil Society Development in Ukraine for 2021-2026, No. 636-p, 07.09.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/636-2024-%D1%80#Text>.
- Resolution of the CMU on State Registration and Functioning of Unified and State Registers Holding by the Ministry of Justice, Under martial law, No. 209. Provision 6, 06.03.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/209-2022-%Do%BF#Text>.
- Resolution of the CMU on Ensuring Public Participation in the Formation and Implementation of State Policy, No. 996, 03.11.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/996-2010-%Do%BF#Text>.
- Resolution of the CMU on the Unified Appeal Processing System, No. 976, 27.11.2019 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/976-2019-%Do%BF#Text>.
- Resolution of the CMU on the Electronic Interaction between Electronic Information Resources, No. 606, 08.09.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/606-2016-%Do%BF#Text>.
- Resolution of the CMU on Approval of the State Anti-Corruption Program for 2023-2025, No. 220, 04.03.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/220-2023-%D1%80#top>.
- Resolution of the CMU on Approval of the Procedure for Maintaining the Register of Non-Profit Institutions and Organisations, Inclusion of Non-Profit Enterprises, Institutions and Organisations in the Register and Exclusion from the Register, No. 440, 13.07.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/440-2016-%D1%80#Text>.
- Resolution of the CMU on Approval of the Procedure for Facilitating Public Expertise of the Activities of Executive Authorities, No. 976, 05.11.2008 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/976-2008-%D1%80#Text>.
- Resolution of the CMU on Approval of the Regulations of the Cabinet of Ministers of Ukraine, No. 950, 18.07.2007 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/950-2007-%D1%80#top>.
- Resolution of the CMU on some issues of providing financial support to public associations of persons with disabilities, No. 70, 27.01.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/70-2023-%D1%80#Text>.

- Resolution of the CMU on the Establishment of a Coordination Headquarters for Ensuring the Implementation of the Rights and Freedoms of Internally Displaced Persons, No. 330, 18.04.2023(in Ukrainian), <https://zakon.rada.gov.ua/laws/show/330-2023-п#Text>.
- Resolution of the CMU on the Establishment of a Coordination Headquarters for De-occupied Territories, No. 1021 of 10 September 2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1021-2022-п#Text>.
- Resolution of the CMU on Approval of the Approximate Regulations on the Council for Internally Displaced Persons', No. 812, 04.08.2023 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/812-2023-п#Text>.
- Order of the Ministry of Finance of Ukraine on approval of the procedure for forming and maintaining the Register of volunteers of the anti-terrorist operation and/or implementing measures to ensure national security and defence, repel and deter armed aggression of the Russian Federation, No. 1089, 30.10.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/z1471-14#Text>.
- Resolution of the Board of the National Bank of Ukraine on the operation of the banking system during the introduction of martial law, No. 18, 24.02.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/v0018500-22#top>.
- Protocol of the operational headquarters of the Defence Council of the Kyiv region dated on procedure for holding mass events in the territory of the Kyiv region under the legal regime of martial law, No. 145, 07.07.2022 (in Ukrainian), <https://koda.gov.ua/wp-content/uploads/2022/07/poryadok-provedennya-masovyh-zahodiv-na-terytorii-kyivskoï-oblas.pdf>.

COURT CASES

- Decision of the Odesa District Administrative Court, 16 January 2024, Case No. 420/29395/23 (in Ukrainian), <https://reyestr.court.gov.ua/Review/116362071>.
- Decision of the Kyiv District Administrative Court, 31 May 2024, Case No. 320/6166/24 (in Ukrainian), <https://reyestr.court.gov.ua/Review/119426187>.
- Decision of the Odesa District Administrative Court, 2 August 2024, Case No. 420/450/24 (in Ukrainian), <https://reyestr.court.gov.ua/Review/120781587>.

RESEARCH & REPORTS

- ISAR Ednannia in partnership with the Ministry of Social Policy of Ukraine, ‘The sociological study ‘Interest and ability of civil society organisations to provide social services’ (in Ukrainian), <https://api.home.ednannia.ua/upload/kch/24/07/22/Дослідження%20про%20соціальної%20послуги.pdf>.
- CEDEM, ‘Key provisions of the report on conducting an independent risk assessment of the non-profit organisations sector’ (in Ukrainian), https://cedem.org.ua/wp-content/uploads/2024/09/Korotka_versiya_na_prezentatsiyu_Zvit_pro_provedenny_a_sektoralnoi-.pdf.
- Ukrainian Institute of media and communication, ‘Analytical report ‘Effectiveness of countering Russian disinformation in Ukraine in a full-scale war’ (in Ukrainian), https://www.jta.com.ua/wp-content/uploads/2023/08/UMCI_-Effectiveness-of-Russian-Disinformation-Counteration_UA.pdf.
- Center for Civil Liberties and OZON Public Monitoring, ‘KyivPride March 2024: monitoring of the assembly and counter-assembly’ (in Ukrainian), <https://ccl.org.ua/wp-content/uploads/2024/06/kyivprajd-marsh-2024-ua.pdf>.
- Institute of mass information, ‘Barometer of freedom of speech for August 2024’ (in Ukrainian), <https://imi.org.ua/monitorings/barometr-svobody-slova-za-serpen-2024-roku-i63424>.
- Digital Security Lab Ukraine, Monthly digest on media and digital rights regulation in Ukraine, https://dslua.org/wp-content/uploads/2024/06/Digest-II-May-2024_UPD.pdf.
- Center for democracy and the rule of law, ‘Responsibility for violations of media legislation’ (in Ukrainian), <https://cedem.org.ua/analytics/vidpovidalnist-porushennya-media/>.
- Ukrainian Helsinki Human Rights Union, Analysis of legislation on restrictions on the right to privacy under the martial law, (in Ukrainian), https://www.helsinki.org.ua/wp-content/uploads/2024/05/Preview_Limit_privacy_A4.pdf.
- Center for analysis and sociological research of the International Republican Institute, Results of a survey of Ukrainian youth conducted from 19 June to 21 July 2024 (in Ukrainian), <https://mriemotadiemorazom.org/ukrainian-youth-today>.

- Digital Security Lab Ukraine, 'Actions and Dreams: Artificial Intelligence in the Public Sector: Analytical study' (in Ukrainian), https://dslua.org/wp-content/uploads/2024/02/Mrii_ta_dii_kopiia.pdf.
- Ukrainian Helsinki Human Rights Union, 'Life sentence for contact with representatives of other countries: new draft laws registered in the Parliament', 26 March 2024 (in Ukrainian), <https://www.helsinki.org.ua/articles/dovichne-za-kontakt-z-predstavnykamy-inshykh-krain-u-parlamenti-zareiestruvaly-novyy-zakonoproiekt/>.
- Institute of Analytics and Advocacy and ISAR Ednannia, 'Activities of donor and international organisations in Ukraine in 2022-2024' (in Ukrainian), https://api.home.ednannia.ua/upload/kch/24/09/10/Activities_of_donor_and_%20in_ternational_%20organisations_%20in_Ukraine.pdf.
- Ministry of Justice of Ukraine and CEDEM, 'Determining the ultimate beneficial owner by public associations and charitable organisations', 15 April 2024 (in Ukrainian), <https://minjust.gov.ua/news/ministry/viznachennya-kintsevogo-benefitsiarnogo-vlasnika-gromadskimi-obednannyami-ta-blagodiynimi-organizatsiyami>.

STATEMENTS

- Statement on the Attempted Attack on Ukraine's European Integration Process and the Independence of Suspilne UA Public Broadcaster (in Ukrainian), <https://dslua.org/publications/zaiava-shchodo-zamakhu-na-protses-ievropeyskoi-intehratsii-ukrainy-ta-nezalezhnosti-suspilnoho/>.
- Public demands transparent, meaningful and inclusive public consultations on draft laws on lobbying: CSOs' appeal (in Ukrainian), <https://www.vplyv.org.ua/archives/8122>.
- Mass information institute, statement of human rights NGOs, media and journalists on the admission of journalists to parliamentary sessions and to the sidelines (in Ukrainian), <https://imi.org.ua/news/verhovnu-radu-zaklykayut-dopustyty-zhurnalistiv-do-svoyih-zasidan-i-v-kuluary-i58981>.
- Group of influence, Appeal of NGOs regarding the restriction of the public's right to freely access information from the court register and to monitor court proceedings, in particular those with a significant public profile, 20.05.2024 (in Ukrainian), <https://www.vplyv.org.ua/archives/9001>.
- Ukrainian Helsinki Human Rights Union, 'Representatives of Ukrainian civil society note a dangerous trend in the prosecution of anti-corruption activists and

investigative journalists by law enforcement agencies in Ukraine, in particular, in the context of the activities of the Armed Forces of Ukraine and the mobilization campaign', 12.04.2024 (in Ukrainian),

<https://www.helsinki.org.ua/articles/vymahaiemo-prypynyty-peresliduvannia-antykoryuptsiynykh-aktyvistiv-ta-zhurnalistiv-rozsliduvachiv/>.

- ZMINA Human Rights Centre, Mediarukh demands from President Zelensky a reaction to the pressure on independent journalists and investigators (in Ukrainian), https://zmina.ua/statements/mediarukh-vymagaye-vid-prezydenta-zelenskogo-reakcziyi-na-tysk-na-nezalezhnyh-zhurnalistiv-ta-rozsliduvachiv/?fbclid=IwZXhobgNhZWOCMTEAARoEpQJDxCpl6cFPoZofeeV8sOGy_6cXkw-vwz45soJ23VNI2R2RURcoL9I_aem_gQGJyySayQ7bgmcmgl9Q5YA.
- CrimeaSOS, Statement of human rights organisations regarding the detention of Crimean Tatar human rights defender and journalist Lutfia Zudiyeva, 22.02.2024 (in Ukrainian), <https://krymsos.com/zayava-pravozahysnyh-organizacij-shhodo-zatrymannya-krymskotatarskoyi-pravozahysnychi-ta-zhurnalistky-lutfiye-zudiyevoyi/>.
- CrimeaSOS, Statement by human rights organisations regarding the inhumane conditions of detention of citizen journalist Ramzi Bekirov in the Russian colony, 10.09.2024 (in Ukrainian), <https://krymsos.com/zayava-pravozahysnyh-organizacij-shhodo-nelyudskiyh-umov-trymannya-u-rosijskij-koloniya-gromadyanskogo-zhurnalista-remzi-bekirova/>.
- Educational House of Human Rights Chernihiv, 'Urgent appeal of the Coalition 'Ukraine. Five in the Morning' Coalition on the massive shelling of critical infrastructure in Ukraine on 22 March 2024', 22.03.2024 <https://ehrh.org/terminove-zvernennya-koalicziyi-ukrayina-pyata-ranku-shhodo-masovanyh-obstriliv-obyektiv-krytychnoyi-infrastruktury-ukrayiny-22-berezhnya-2024-roku/>.
- Facebook page, 'Statement of the Coalition 'Ukraine. Five in the Morning' Coalition statement on the Russian missile attack on medical facilities and civilian infrastructure', <https://www.facebook.com/Ukraine.5am/posts/pfbido2CEKYSx8jBxSK9mnvsBF1LNT7c6CX3nr8J1nRi89DswsM6cm3JMQtZ8sLLCF2Z9ivl>.

MEDIA ARTICLES & OTHER ONLINE SOURCES

- Ministry of Justice of Ukraine, 'Online House of Justice' (in Ukrainian), <https://online.minjust.gov.ua>.
- Donetsk, Kherson, Luhansk and Zaporizhzhia oblasts FAQs on sanctions against Russia and Belarus, with a focus on the following legislation: Council Regulation (EU)

2022/263, https://finance.ec.europa.eu/publications/donetsk-kherson-luhansk-and-zaporizhzhia-oblasts_en.

- ISAR Ednannia, 'The second summit of professional fundraisers 'Heroes' Backbone' ISAR Ednannia has started' (in Ukrainian), <https://ednannia.ua/novyny/nashi-novini/12789-startuvav-drugij-samit-profesijnikh-fandrejzeriv-pomichniki-gerojiv-isar-ednannya>.
- Kirovohrad Regional State Administration, 'On holding mass events and the territory of the region under martial law' (in Ukrainian), <https://www.kr-admin.gov.ua/start.php?q=News/Ua/2021/08062202.html>.
- Press service of the Supreme Council of Ukraine, the Speaker of the Ukrainian Parliament Ruslan Stefanchuk signed an order on the admission of journalists to the Supreme Council of Ukraine under martial law, 08.05.2024 (in Ukrainian), <https://www.rada.gov.ua/news/Novyny/249274.html>.
- National Police of Ukraine, 'Department of Preventive Activities' (in Ukrainian), <https://www.npu.gov.ua/pro-policiyu/struktura-nacionalnoyi-policiyi/departament-preventivnoyi-diyalnosti>.
- ZMINA Human Rights Centre, 'Passions behind lobbying: what does the long-suffering law 'On Fair Lobbying' mean?' (in Ukrainian), <https://zmina.info/columns/prystrasti-za-lobizmom-shho-nese-bagatostrazhdalnyj-zakon-pro-dobrochesne-lobiyuvannya/>.
- Detector media, 'How lobbying threatens civil society organisations' (in Ukrainian), <https://cs.detector.media/reforms/texts/186026/2024-04-05-chym-zagrozhue-lobizm-organizatsiyam-gromadyanskogo-suspilstva/>.
- Digital Security Lab, Draft Law on video monitoring: protection of public security or a licence for mass surveillance, 09.05.2024 (in Ukrainian), <https://dslua.org/publications/zakonoproiekt-pro-videomonitorynh-zakhyst-publichnoi-bezpeky-chy-litsenzia-na-masove-stezhennia/>.
- Information portal *Bihus.Info*, <https://bihus.info>.
- Mass information institute, 'The editors of Vilny Radio suffered a series of phishing attacks aimed at the media's corporate mail', 22.08.2024 (in Ukrainian), <https://imi.org.ua/news/vilne-radio-otrymalo-nyzku-fishyngovyh-lystiv-avtory-yakyh-predstavlyalysya-podatkovoyi-ta-sbu-i63161>.

- ZMINA Human Rights Centre, 'Activist Iryna Fedoriv said that someone on her behalf appealed to the SBI with a complaint about her colleague Oleksandr Salizhenka', 29.04.2024 (in Ukrainian), <https://zmina.info/news/aktyvistka-iryna-fedoriv-zayavyla-shho-htos-vid-yiyi-imeni-zvernuvsya-do-dbr-zi-skargoyu-na-kolegu-oleksandra-salizhenka/>.
- The Mission of the President of Ukraine in the Autonomous Republic of Crimea, operational report, 'Update on the Situation in the Temporarily Occupied Territory of the Autonomous Republic of Crimea and the City of Sevastopol as of September 16, 2024', 16.09.2024 (in Ukrainian), <https://ppu.gov.ua/en/press-center/operatyvna-informatsiia-shchodo-sytuatsii-na-tymchasovo-okupovaniy-terytorii-avtonomnoi-respubliky-krym-ta-mista-sevastopolia-stanom-na-16-veresnia-2024-roku/>.
- CEDEM, Expert discussion 'New requirements for determining the ownership structure of non-profit organisations - clearly about the complex', 24.06.2024 (in Ukrainian), <https://cedem.org.ua/news/struktura-vlasnosti-neprybutkovyh/>.
- CEDEM, 'Politically significant individuals in OCSs - what is the risk?' (in Ukrainian), <https://cedem.org.ua/news/pep/>.
- CEDEM, Results of the expert discussion 'International financing of civil society organisations: problems of banking services caused by war' (in Ukrainian), <https://cedem.org.ua/news/cedem-ekspertna-zustrich-banky/>.
- NSSU, Institutions that involve volunteers in their activities to carry out volunteer work in Ukraine (in Ukrainian), <http://195.230.133.141:21133>.
- ZMINA Human Rights Centre, 'Insurance, benefits and youth engagement: how the state plans to develop volunteering and what else needs to be changed', 20.09.2024 (in Ukrainian), <https://zmina.info/articles/derzhavna-programa-spryyannya-rozvytku-volonterstva-yakym-ye-bachennya-ekspertnoyi-spilnoty/>.
- Government portal, 'The government has updated the tasks of the Action Plan until 2024 for the implementation of the National Strategy for Civil Society Development in Ukraine', 19.07.2024 (in Ukrainian), <https://www.kmu.gov.ua/news/uriad-aktualizuvav-zavdannya-planu-zakhodiv-do-2024-roku-shchodo-realizatsii-natsionalnoi-stratehii-spryiannia-rozvytku-hromadianskoho-suspilstva-v-ukraini>.
- Online form, 'Join the preparation of the action plan for the implementation in 2025-2026 of the National Strategy for Civil Society Development in Ukraine for 2021-2026' (in Ukrainian), https://docs.google.com/forms/d/1qtv3uhz7YyigAO7G3itpHbOLzjwoC_839bZw79IM8KE/viewform?edit_requested=true.

- ISAR Ednannia, 'We are starting to develop a new action plan for the implementation of the National Strategy for Civil Society Development in Ukraine for 2025-2026', 18.03.2024 (in Ukrainian), <https://ednannia.ua/news/nashi-novini/12610-rozpochinaemo-rozrobku-novogo-planu-zakhodiv-z-realizatsiji-natsionalnoji-strategiji-spriyannya-rozvitku-gromadyanskogo-suspilstva-v-ukrajini-na-2025-2026-roki>.
- Government portal, 'We are starting to develop a new action plan for the implementation of the National Strategy for Civil Society Development in Ukraine for 2025-2026', 03.05.2024 (in Ukrainian), <https://www.kmu.gov.ua/news/vidbulasia-seriia-onlain-obhovoren-dlia-pidhotovky-novoho-planu-zakhodiv-z-realizatsii-natsionalnoi-stratehii-spriyannia-rozvytku-hromadianskoho-suspilstva-v-ukraini>.
- CMU, Information on the status of implementation of the action plan until 2024 for the implementation of the National Strategy for Civil Society Development in Ukraine for 2021-2026, approved by the CMU on 14 February 2023 No. 160 (in Ukrainian), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spriyannia/info_svitlofor_20240401.pdf.
- On the involvement of civil society representatives in the negotiation process (in Ukrainian), https://drive.google.com/file/d/1qA3yYCBZf-dZThoTjJA_mDgDtis-ac3F/view?fbclid=IwY2xjawFc3N5leHRuA2FlbQIxMAABHaA_ZBp-SDbrQHcBBFSEppT-QESJZC7cw4DDVVS2p2XN36xArMLYb4ldAcg_aem_ezm9SrfJ8hQga_EETo_tvw.
- Work plan of the Ministry of Digital Transformation of Ukraine for 2024 (in Ukrainian), https://cms.thedigital.gov.ua/storage/uploads/files/page/ministry/План_роботи_МДТ_2024_compressed.pdf.
- Ministry of Digital Transformation of Ukraine, 'Ukraine ranked 5th in the UN Global Online Service Index' (in Ukrainian), <https://thedigital.gov.ua/news/ukraina-posila-5-te-mistse-za-indeksom-onlayn-servisiv-u-globalnomu-reytingu-oon>.
- CEDEM, 'From loud statements to practice: the realities of artificial intelligence regulation', 7.06.2024 (in Ukrainian), <https://cedem.org.ua/analytics/regulyuvannya-shtuchnogo-intelektu/>.
- Digital Security Lab Ukraine, 'Recommendations for the responsible use of artificial intelligence in the media' (in Ukrainian), https://dslua.org/wp-content/uploads/2024/01/Rekomendatsii_SHI_media.docx.pdf.

- NSSU, Expert Discussion of the Concept of the State Programme for the Development of Volunteering in Ukraine, 09.02.2024 (in Ukrainian), <https://nssu.gov.ua/news/ekspertne-obhovorennia-kontseptsii-derzhavnoi-prohramy-rozvytku-volonterskoi-diialnosti-v-ukraini>.
- IGov. A government e-service portal in Ukraine (in Ukrainian), <https://igov.org.ua/subcategory/1/10/situation/44?anchor8=undefined#anchor3>.
- OpenDataBot (in Ukrainian), <https://opendatabot.ua/open/edr>.
- YouControl (in Ukrainian), <https://youcontrol.com.ua/catalog/>.
- Diia Platform. Registration for business entities (in Ukrainian), <https://diia.gov.ua/services/categories/biznesu/stvorennia-biznesu>.
- Diia.gov.ua, 'Changes to information about a legal entity contained in the Unified State Register, including changes to the constituent documents of a legal entity (except for a public formation)' (in Ukrainian), <https://guide.diia.gov.ua/view/derzhavna-reiestratsiia-zmin-do-vidomostei-pro-iurydychnu-osobu-krim-hromadskoho-formuvannia-ta-relihiinoi-orhanizatsii--shcho-m-7472d45b-ee89-4885-a2ec-af9e5290b4dc>.
- Restart Business, 'Business relocation support' (in Ukrainian), <https://restartbusiness.in.ua>.
- U.S. Agency for International Development and U.S. Department of State, Foreign Assistance Dashboard (data last updated on 19.12.2024), <https://foreignassistance.gov>.
- Diia.gov.ua, 'The space of electronic tenders' (in Ukrainian), <https://grants.vzaemo.diia.gov.ua>.
- Ukrainian Cultural Foundation, Grant programmes (in Ukrainian), <https://ucf.in.ua/programs>.
- Ukrainian Veterans Fund of the Ministry of Veterans Affairs of Ukraine (in Ukrainian), <https://mva.gov.ua/vartogo>.
- Ukrainian Youth Foundation, Grants and programmes (in Ukrainian), <https://uyf.gov.ua/en/programs>
- Volunteer Platform (in Ukrainian), <https://platforma.volunteer.country>.
- Palyanytsia.info (in Ukrainian), <https://palyanytsya.info>.

- Interactive map of the Councils on Internally Displaced Persons (in Ukrainian), <https://www.google.com/maps/d/viewer?mid=16U89yrKy-JK8Ngp6SJKkMMoRknpPG3E&femb=1&ll=48.285106257078496%2C30.87953290400438&z=5>.

