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CSO Meter 2025: Ukraine Country Report

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Author: Mariia Krasnenko, ISAR Ednannia expert

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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	20
3.3 ACCESS TO FUNDING	24
3.4 FREEDOM OF PEACEFUL ASSEMBLY	28
3.5 RIGHT TO PARTICIPATION IN DECISION-MAKING	35
3.6 FREEDOM OF EXPRESSION	44
3.7 RIGHT TO PRIVACY	53
3.8 STATE DUTY TO PROTECT	58
3.9 STATE SUPPORT	64
3.10 STATE-CSO COOPERATION	72
3.11 DIGITAL RIGHTS	77
IV. KEY PRIORITIES	83
V. METHODOLOGY	85
VI. REFERENCES	87

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 Ukrainy</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

In 2025, Ukraine continued to live under the conditions of the full-scale aggression of the Russian Federation. The war shapes the key elements of the functioning of the state and civil society, creating both challenges and new opportunities.

The political context is defined by the need to balance between fighting the war, pursuing internal reforms, and advancing European integration. In 2025, Ukraine maintained the stability of its democratic institutions despite ongoing attempts at destabilisation, primarily external, including through hybrid attacks (for example, disinformation campaigns). Alongside military challenges, work continued on anti-corruption policy, judicial reform, and ensuring the proper functioning of state institutions.

In July 2025, the so-called “Cardboard Protests” took place, sparked by the risk of the government backsliding on anti-corruption reforms.¹ Society demonstrated a demand for openness and dialogue from the authorities, as the closed nature of decision-making processes under martial law affects the level of public trust.

A significant number of civil society representatives continued to serve in the Defence Forces of Ukraine, including those who joined during 2025. As a result of the war—both due to military service and to Russian attacks on Ukrainian cities—the civic sector continued to suffer losses. In 2025, Viktoriia Hrebenuk (employee of the NGO “100% Life”) and her two-month-old son, Taras Shput (former employee of the “Come Back Alive” Foundation, serviceman), and Oleksandr Hatiiatullin (human rights defender, founder of the NGO “Ukraine Without Torture,” serviceman) were killed. Following a Russian attack on 3 September 2025, two employees of DRC were killed and eight others were injured. These are only a few of the names of civil society representatives whose lives were taken by the Russian Federation.

Some CSOs remained focused on emergency response (e.g., humanitarian aid, provision of shelter, etc.). The involvement of CSOs in humanitarian response and, at the same time, in recovery measures has not diminished during the reporting period.

¹ See section 3.4 below.

In 2025, Ukraine continued the negotiation process on the path towards membership of the European Union, including completing the screening of legislation for accession. Ukraine's European integration track enjoys significant support from CSOs, although their involvement in some cases bears signs of being more formal than substantive.

Technology remains both a challenge and a resource. On the one hand, digital tools simplify reporting, registration, and fundraising, making CSO activities more transparent and accessible. On the other hand, cyber threats from Russia, large-scale disinformation campaigns, and manipulation through social media pose serious risks to information security.

In 2025, Ukraine saw a change of government, now headed by Yuliia Svyrydenko. The heads of most ministries also changed. Due to martial law, elections in Ukraine were not held.

The situation in Ukraine unfolds against the backdrop of a global crisis of democracy, the rise of authoritarian regimes, and worldwide instability. The war in Ukraine has become a defining point for Europe's future: whether the democratic model can withstand authoritarianism or must yield to it. Increasingly, Ukraine emerges not only as the subject of aggression but as the frontier of global democracy, capable of providing answers to global challenges—from cyber threats to post-war recovery.

Key developments and priorities in the civil society environment

The overall country score for the CSO environment in Ukraine in 2025 was 4.7 out of 7, indicating no change compared to 2024 (4.7). The average country scores for Legislation and Practice in most areas remain largely unchanged compared to 2024, reflecting the ongoing impact of the war and the continuation of systemic challenges.

The most significant changes in 2025 occurred in **Area 6: Freedom of Expression**, where the overall score dropped to **4.8** (Legislation: **5.4**, Practice: **4.1**). This reflects concerns about legislative changes in the field of freedom of expression, as well as persistent challenges in the practical implementation of the rules to protect freedom of expression.

Other areas show stability, with scores for both Legislation and Practice largely unchanged from 2024. The three areas with the highest scores remain consistent with previous years: Freedom of Association (5.6), Equal Treatment (5.3), and State-CSO Cooperation (5.3). The areas with the lowest scores also remain unchanged: State Duty to Protect (3.7), Right to Privacy (4.1), and State Support (4.4).

Key developments

- As part of Ukraine's preparation for EU accession, the government **adopted three strategic roadmaps under Cluster 1, "Foundations of the Accession Process," including a roadmap on the functioning of democratic institutions.** This outlines a set of actions to strengthen an enabling environment for CSOs and demonstrates an inclusive approach, although a mechanism for monitoring the implementation of these measures has not yet been established.
- **Financial challenges for CSOs resulting from reduced donor funding** (in particular, USAID) have led to a decrease in the activities of CSOs, as well as the termination of certain areas of work, including some operations of independent media.
- **The President signed the Law "On Amendments to Certain Laws of Ukraine Regarding People's Power at the Level of Local Self-Government,"** which also entered into force in 2025. Among other things, it defines the forms of participation in decision-making on local issues.
- The government continued to **implement the National Strategy for Promoting Civil Society Development in Ukraine** and approved the Action Plan for its implementation for 2025–2026. Among its achievements is the government's approval of a model charter for CSOs and the introduction of online registration through the "Diia" portal (a pilot launch started on 5 December 2025²).
- **Law No. 4608-IX entered into force, introducing the status of a "verified humanitarian organisation,"** which allows CSOs to import vehicles duty-free for use in evacuations, deliveries, and the provision of aid.
- Members of Parliament adopted Law No. 4505-IX, which entered into force on 5 July 2025, providing **VAT exemption for social services** for all categories of providers listed in the Register, including CSOs.
- **The Parliament resumed broadcasting its sessions,** thereby ensuring transparency. However, the provision of information by parliamentary committees continues to raise concerns, as the President has not signed Draft Law No. 11321, which is aimed at ensuring the transparency of Parliament and its committees. The same challenges persist at the local level.

²<https://guide.diia.gov.ua/view/derzhavna-reiestratsiia-stvorennia-hromadskoho-obiednannia-df01c1fb-038f-4277-837d-81d6931bf8f3>.

- **The Law on Lobbying**, which entered into force on 1 September 2025, **continues to raise public concerns** about the risk of equating advocacy activities with political or business lobbying.

At the same time, there are significant concerns regarding freedom of expression and the right to privacy as a result of legislative initiatives and government actions under martial law.

Key priorities

Out of the 7 key priority recommendations³ outlined in the 2024 **CSO Meter** report for Ukraine, 3 were partially addressed in 2025 through the following measures. Criteria for introducing a service for CSO registration via the “Diia” portal were established, and CSOs became involved in the development of “Diia” program documents. In addition, investigations into attacks on journalists and civic activists, particularly by the Russian Federation, have continued.

To improve the CSO environment, Ukrainian institutions, together with CSOs and all other stakeholders, should prioritise the following 7 recommendations out of a total of 40 recommendations across 11 areas of the CSO Meter:

³ 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.

1. 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;
2. The Parliament of Ukraine should review the provisions of the Law on Public Consultations, implement its application immediately, and define the obligation of MPs to hold public consultations;
3. The National Bank of Ukraine (NBU) should facilitate CSOs' access to banking services on an equal footing with businesses, including for 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;
4. 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;
5. The Ministry of Digital Transformation, and the Ministry of Justice should ensure the functioning of the service for the registration and updating of information on CSOs, including both public associations and charitable foundations, on the *Diia* portal;
6. The CMU, through its authorised bodies, should ensure equal access for CSOs to public procurement and promote broad dissemination of information to CSOs regarding access to public procurement; and
7. The Parliament of Ukraine should adopt the Draft Law on the Regulation of the Activities and State Registration of Public Associations (registration No. 8084).

II. UKRAINE – IN NUMBERS

Population: No data for 2025⁴ | GDP per capita: USD 6,250 (2025)⁵ | Number of CSOs: ⁶ (2025) | CSOs per 10,000 inhabitants: Cannot be determined⁷ | Registration fee for CSOs: None | Freedom in the World: Partly Free (51/100) (2025)⁸ | World Press Freedom Index: 62nd out of 180 countries, score 63,93 (2025)⁹



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	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	4.8 ↓	5.4 ↓	4.1 ↓
Right to Privacy	4.1	4.9	3.2
State Duty to Protect	3.7	4	3.4
State Support	4.4	4.7	4
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.

⁴ There is currently no relevant statistical information available, due to the large-scale displacement caused by the armed aggression of the Russian Federation against Ukraine, resulting in 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.

⁵ International Monetary Fund, 'GDP per capita', (2025),

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

⁶ No relevant data is available as of the date of report preparation

⁷ 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; see fn 2.

⁸ Freedom House, 'Freedom in the World 2025'.

⁹ Reporters Without Borders, '2025 World Press Freedom Index' (2025), <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 registration procedure is clearly defined. The launch of services for registering public organisations on the “Diia” portal is expected (a pilot launch started on 5 December 2025). To this end, the government has initiated a pilot project for registration based on a model statute which will simplify the registration process by eliminating the need for CSOs to develop their own founding documents. The Draft Law on Amendments to Certain Laws of Ukraine on the Regulation of Activities and State Registration of Public Organisation has progressed — it was recommended by the relevant committee for consideration by Parliament at second reading.

The overall score for the area of “Freedom of Association,” as well as the assessments of legislation and practice, remains the same as in the previous reporting period.

Recommendations made in this area during the previous reporting period were partially implemented or are pending, namely: the launch of registration through the “Diia” portal and the removal of legislation restricting CSO activities. The recommendation to adopt the Draft Law on Regulation of Activities and State Registration of Public Associations and to further digitise services remains relevant.

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

The Constitution of Ukraine¹⁰ 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.¹¹ The activities of charitable foundations and charitable societies are regulated by the Law on

¹⁰ Article 36, Constitution of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/254к/96-бп#Text>.

¹¹ 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>.

Charity and Charitable Organisations.¹² Other forms of CSO also exist, such as public unions, and charitable societies, which are similarly regulated by the aforementioned Laws.

Citizens of Ukraine, foreigners and stateless individuals who are legally residing in Ukraine, in each case having 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 under 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 by legal entities under private law. Public organisations can carry out their activities with or without having the status of a legal entity. Charitable organisations can only be registered 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. In 2025, there are no practical restrictions on the creation of CSOs (other than the age-related criteria outlined above), 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.¹³ 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 Organisations¹⁴ (Register) can be submitted (the Register includes data on organisations that are not taxpayers of VAT). Experts note¹⁵ that in 2025, there was a decrease in the number of inquiries for support they received regarding difficulties with inclusion in the Register of Non-Profit Institutions and Organisations simultaneously with registration. This is partly due to improved procedures on the part of the tax authorities (namely their synchronisation with the Register). In 2025, tax authorities in practice required fewer paper confirmations to be submitted directly to them, and in most cases, the registrar's

¹² 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>.

¹³ 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>.

¹⁴ 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>.

¹⁵ Dmytro Yaprakh, Legal Consultant on Freedom of Association, UCIPR, during an interview on 12 September 2025.

mark made during registration is sufficient confirmation. According to observations, this positive trend is still isolated but indicates gradual progress.

State registration of CSOs is carried out by reference to the organisation's location. It is possible to submit registration documents by post. Following a cyberattack on the Ministry of Justice on 19 December 2024,¹⁶ during 2025, registration through the "House of Justice"¹⁷ platform became unavailable, and the service currently remains non-operational. Providing the possibility of CSO registration via the "Diia" portal¹⁸ was identified as a priority in the Action Plan of the National Strategy for Promoting Civil Society Development¹⁹ for implementation in 2025–2026 (its launch was scheduled for 1 November 2025). Experts note²⁰ that implementation of this measure is already taking place in cooperation with CSOs. This is also supported by the adoption of a pilot project enabling the establishment of a public organisation on the basis of a model charter (which entered into force on 01.11.2025), which will be used during online registration.²¹ The model charter is not mandatory. During registration, organisations may select the option that best suits their needs. The registration of Charitable Foundations through the "Diia" portal currently remains under discussion.

CSOs also continue to face difficulties due to a lack of specialists (such as registrars, lawyers, etc.) in the registration bodies. Alternative electricity sources, primarily autonomous generators, are being provided due to support programs to minimise the impact of power outages caused by the 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 2025, registration authorities continued to use the option to extend the deadline for review.²² The Law on State Registration of Legal Entities, Individual Entrepreneurs and Public

¹⁶ SSU Cyber Security Department, 'Russian intelligence services are involved in cyberattack on state registers of Ukraine's Ministry of Justice, 20.12.2024, <https://ssu.gov.ua/en/novyny/do-kiberataky-na-derzhavni-reiestry-miniustu-prychetni-rosiiski-spetssluzhby-departament-kiberbezpeky-sbu>.

¹⁷ "The House of Justice" is an online project of the Ministry of Justice of Ukraine that brings together all the services provided by the Ministry in electronic form.

¹⁸ Diia: Government Services Online. <https://diia.gov.ua>.

¹⁹ Resolution of the CMU on the Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026, No. 246-r, 21.03.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/246-2025-%D1%80#Text>

²⁰ Dmytro Yaprakh, Legal Consultant on Freedom of Association, UCIPR, during an interview on 12 September 2025.

²¹ Resolution of the CMU on the Implementation of a Pilot Project to Enable the Operation of a Public Organisation Based on a Model Charter, No. 460, 18 April 2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/460-2025-%D0%BF#Text>.

²² Dmytro Yaprakh, Legal Consultant on Freedom of Association, UCIPR, during an interview on 12 September 2025.

Associations does not clearly define the grounds for such extensions, 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 to be provided and the applicable deadlines. The Law provides an exhaustive list of grounds for refusal of state registration. In practice, the most common reasons for rejection reported by those seeking to register CSOs in 2025 remain: (i) incorrectly writing the name of the organisation in a foreign language; (ii) the absence of certain mandatory provisions in the organisation’s charter; (iii) incorrectly filling in the application form; (iv) using the wrong application form; and (v) submission of an incomplete set of documents.²³ Judicial appeal remains the only available tool for CSOs to challenge rejection of a registration application. In 2025, there was one appeal,²⁴ which concerned a decision in a matter initiated in previous years. Specifically, the appeal challenged the Ministry of Justice’s cancellation of a registration action regarding changes to the organisation’s name and charter. The charter included a provision stating that, in the event of the organisation’s dissolution, its assets would be sold at market value and the proceeds distributed among the members — a provision that does not comply with the applicable Law on Public Associations,²⁵ as assets must instead be transferred to other public organisations with similar statutory objectives. The appeal was rejected.

On 4 July 2025, the Parliamentary Committee on Legal Policy recommended²⁶ that the Verkhovna Rada adopt at second reading the government’s Draft Law No. 8084 without amendment.²⁷ This draft law provides for a number of improvements to the CSO registration process, including: (i) increasing the number of registration bodies; (ii) reducing the number of required documents; (iii) shortening the registration period from three business days to 24 hours; and (iv) introducing an online registration procedure on a permanent basis.

²³ Stated by civil society experts with experience in the relevant fields during CSO Meter interviews, consultations and focus group studies conducted in September 2025.

²⁴ According to data from the Unified State Register of Court Decisions (in Ukrainian), <https://reyestr.court.gov.ua>. Access to the Register is provided in a test (limited) mode. To prevent threats to the life and health of judges and participants in judicial proceedings, and in cases where signs of a cyber threat are detected, access to the Register or to individual decisions within it may be restricted.

²⁵ Case No. 640/31479/20. <https://reyestr.court.gov.ua/Review/128041358>.

²⁶ Audio recordings of the Parliamentary Committee on Legal Policy meetings for July–August 2025 (in Ukrainian), https://kompravpol.rada.gov.ua/audio/audio_z/75976.html.

²⁷ 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 Associations²⁸ 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 under 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 to 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 activities are not specified in their charters.²⁹ The goals of charitable foundations, on the other hand, 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.³⁰ Therefore, charitable foundations are more limited in defining their goals and scope of activities than public associations.

In practice, there are no obstacles that prevent CSOs from participating in all legally allowed areas of activity. In 2025, no draft laws were registered that are potentially harmful to the civil society environment and freedom of association (such as legislative initiatives No. 11103³¹ and No. 11104³², which envisaged criminal liability for presenting positions outside of approved state missions and would complicate international advocacy carried out by CSOs; both of which were introduced but withdrawn in 2024). This compares favourably to the previous period.

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.

The sanctions for nonprofit CSOs who operate without correct registration are clearly defined in the Tax Code of Ukraine (article 113). Despite the obligation on registration authorities to send notices of exclusion from the Register to CSOs, in practice, CSOs may not receive such notifications, which can result in the imposition of a sanction. Where CSOs are excluded

²⁸ Article 4, Law of Ukraine on Public Associations, *op. cit.*

²⁹ 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>.

³⁰ Article 3, Law of Ukraine on Charitable Activities and Charitable Organisations, *op. cit.*

³¹ Draft Law on Special Missions of Ukraine, No. 11103, 20.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43873>.

³² 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>.

from the Register, they can reapply to be included in the Register. Violation of the provisions on reporting forms and procedures established for all legal entities do not result in 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 under AML/CTF rules. The fine for failure to provide such information ranges from UAH 17,000 (approx. 348 EUR) to UAH 51,000 (approx. 1,045 EUR). Experts note³³ that banks in 2025 continued to misinterpret UBO requirements for CSOs, particularly regarding the terms of authority of a CSJ's head (for example, the election dates at General Assembly meetings or the submission of amended information to the Register). The National Bank of Ukraine (NBU) has not provided clarifications for banks. This is particularly problematic in cases where the registrar accepts the absence of an ultimate beneficiary in a CSO (in contrast to the bank's financial monitoring), and where the scope of the banks' authority to assess the existence of an UBO in a CSO is not clearly defined.

Under the current legislation, termination of a CSO's activities is achieved either by its own decision (adopted by the supreme governing body of the CSO through self-dissolution or reorganisation) or by a court decision prohibiting the CSO (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 where its activities appear to be 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 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 when an authorised person of a charitable organisation has been convicted for committing a criminal offence against the foundations of the national security of Ukraine.³⁴ In practice, dissolution by court order is extremely rare. In 2025, the activities of at least³⁵ eight organisations were prohibited by court order, including: the Charitable Foundation "YEDYNE NARODNE KAZNACHEYSTVO" (United National Treasury),³⁶ the Public Association

³³ Liliya Viryovkina, lawyer and expert in legal and tax support for CSOs, Chair of the NGO "You Are Needed in Ukraine," during an interview on 15 September 2025.

³⁴ 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>.

³⁵ Access to the Register is currently available in test (limited) mode. To prevent threats to the life and health of judges and participants in judicial proceedings, as well as in the event of signs of a cyber threat, access to the Register or to specific decisions within it may be restricted.

³⁶ Decision of the Kyiv District Administrative Court dated 24 March 2025 in Case No. 320/12911/24. <https://reyestr.court.gov.ua/Review/126098425>.

“Community of Don Cossacks of Luhansk Region,”³⁷ the Public Association “Crimean Cultural and Educational Society of Czechs ‘Vltava’,”³⁸ the Public Association “Luhansk Cossack District of the International Union of Public Associations ‘Great Don Army’,”³⁹ the Public Association “Russian Society named after A. Pushkin” and its local branches,⁴⁰ the Rovenky City Public Association “Society of Don Cossacks,”⁴¹ the All-Ukrainian Public Association “Slavic Movement ‘Revived Rus’,”⁴² and the Public Association “Crimean Estonian Society”⁴³. As in the previous year (when three organisations were prohibited), the court justified its decision in each case by reference to the identification by the Security Service of Ukraine (SBU) of a real threat to the national interest, national security, sovereignty, or territorial integrity of Ukraine.

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 the monitoring and inspection of CSOs by the state. The reporting procedures and requirements for CSOs are well-defined and reporting can be carried out online.

CSOs are obliged to keep accounting, financial and statistical reports, which must be registered with the tax authorities. Public organisations that receive financial support from the state budget of Ukraine or 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 and a profit and loss statement. CSOs with the status of non-profit organisation must submit a financial report which consists of a balance sheet (income and profit). Detailed statistical information (such as the 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 to

³⁷ Decision of the Luhansk District Administrative Court dated 5 June 2025 in Case No. 360/571/25. <https://reyestr.court.gov.ua/Review/127914053>.

³⁸ Decision of the Odesa District Administrative Court dated 9 May 2025 in Case No. 420/4370/25. <https://reyestr.court.gov.ua/Review/127231330>.

³⁹ Decision of the Luhansk District Administrative Court dated 2 June 2025 in Case No. 360/570/25. <https://reyestr.court.gov.ua/Review/127833604>.

⁴⁰ Decision of the Lviv District Administrative Court dated 3 April 2025 in Case No. 380/25377/24. <https://reyestr.court.gov.ua/Review/126340276>.

⁴¹ Decision of the Luhansk District Administrative Court dated 9 January 2025 in Case No. 360/1423/24. <https://reyestr.court.gov.ua/Review/124309395>.

⁴² Decision of the Kyiv District Administrative Court dated 8 April 2025 in Case No. 320/6114/24. <https://reyestr.court.gov.ua/Review/126697856>.

⁴³ Decision of the Odesa District Administrative Court dated 22 May 2025 in Case No. 420/8412/25. <https://reyestr.court.gov.ua/Review/127549870>.

be submitted.⁴⁴ Experts note⁴⁵ that in 2025, reporting remained at the same level as before: cases of submitting statistical information vary, and submission via online/offline formats depends on the capabilities of the CSOs themselves.

The state does not categorise CSO activities as high risk and requiring frequent inspections. Where inspections do occur, the relevant authorities generally conduct them in a reasonable, proportionate and objective manner. However, some CSOs, particularly newly-established ones, still 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 (registration No. 8084);
- The Ministry of Justice, together with the Ministry of Digital Transformation, should ensure the operation of the registration and amendment services for CSOs, including both public organisations and charitable foundations, on the online 'Diia' portal;
- The CMU, together with the NBU, should carry out further consultations with CSOs that do not have a UBO with a view to their exclusion from the list of CSOs required to provide information on their UBOs.

⁴⁴ Order of the State Statistics Service of Ukraine on invalidation of 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>.

⁴⁵ Stated by civil society experts with experience in the respective fields during CSO Meter interviews, consultations and focus group studies conducted in September 2025.

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, 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.

The overall score for the area of Equal Treatment, as well as the scores for Legislation and Practice, remained the same as in 2024.

While the general attitude toward CSOs remains positive, a review of their treatment as compared to businesses is necessary — particularly in terms of registration (timelines and online access), public procurement, and banking services. In addition, CSOs affected by the armed aggression of the Russian Federation continued to face acute challenges and require targeted support.

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 are for business entities.⁴⁶ However, the registration timeframe is longer for CSOs.⁴⁷ CSOs currently do not have the possibility to submit documents for state registration electronically through the online "Diia" portal. The launch of online registration of NGOs was scheduled for 1 November 2025, as a time-limited experimental project (as of 12 November 2025, the service had not yet been launched). Within this project, online document submission will be available only for the establishment of organisations using a model charter. Additionally, the need for CSOs to be able to submit online applications for making changes to their registration data remains unaddressed, as the introduction of such a function is not currently planned.

⁴⁶ *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>.

⁴⁷ *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>.

Experts note⁴⁸ that the treatment of CSOs during registration largely depends on the human factor and the region — in some regions, the attitude of the state register employees is more positive and competent, with no unjustified refusals. It is also noted that there is a lack of experience-sharing practices between regional branches of the state registers.

The Law on Public Procurement⁴⁹ does not establish any exceptions or special conditions for CSOs. Although the state does not deny or impede CSOs' access to procurement procedures at the regulatory level, CSOs still 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 in the field of public procurement. Difficulties in meeting these requirements are 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.

In 2025, legal regulation of access to funding, including from/to abroad, was generally less favourable for CSOs than for business entities. Certain CSOs (namely those that have relocated to, or have founders whose place of registration is in, the temporarily occupied territories of Ukraine) are subject to additional measures, such as account blocking until the actual place of residence is confirmed. According to experts,⁵⁰ this process, which renders CSOs unable to carry out statutory activities, may last up to six months and poses risks to the operation of the CSOs. In addition, such CSOs, as well as businesses, face difficulties when conducting cross-border operations due to the fact that Ukraine facing armed aggression from the Russian Federation is often incorrectly assessed as a terrorism financing risk.

CSOs affected by the armed aggression of the Russian Federation, including those that have relocated from territories where hostilities are being (or have been) conducted or that are in territories temporarily occupied by the Russian Federation, do not receive the same level of support as businesses. At the state level, there are several programs aimed at providing financial support to businesses, such as micro-grants for starting, scaling, or relocating existing micro-enterprises and small businesses in cities and villages,⁵¹ or grants for the recovery of

⁴⁸ Liliya Viryovkina, lawyer and expert in legal and tax support for CSOs, Chair of the NGO "You Are Needed in Ukraine," during an interview on 15 September 2025.

⁴⁹ Law of Ukraine on Public Procurement, No. 922-VIII, 25.12.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/922-19#Text>.

⁵⁰ Liliya Viryovkina, lawyer and expert in legal and tax support for CSOs, Chair of the NGO "You Are Needed in Ukraine," during an interview on 15 September 2025.

⁵¹ *Givingtuesday.ua*, 'Business Support Programs in Ukraine', 02.04.2025 (in Ukrainian), <https://givingtuesday.ua/statti/programy-pidtrymky-biznesu-v-ukrayini/>.

businesses damaged by the war⁵². In contrast, support for CSOs in these locations is mostly provided by national CSOs through civil society strengthening projects. For example, in 2025, ISAR Ednannia supported CSOs in frontline areas.⁵³

Inspections of, and sanctions against, CSOs are generally 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 2025, there have been no known cases of governmental institutions giving preferential treatment to particular organisations. There is a practice of trust-building and sustainable cooperation between the state and individual CSOs. CSOs that express views and positions critical of public officials or policies are not deliberately restricted in their activities.

CSOs established by foreign legal entities or individuals are subject to separate document submission requirements than CSOs established as Ukrainian entities or by Ukrainian citizens. Experts note⁵⁴ that the verification of CSOs with foreign founders is more thorough and takes longer than for CSOs established as Ukrainian entities. In practice, CSOs often include foreigners only as members of their Supervisory Boards, and the personal information of these foreign members is neither verified nor recorded in the state registers. When it comes to grounds for prohibition of registration and termination of activities, the same rules apply to foreign CSOs operating in Ukraine as to Ukrainian-established CSOs.⁵⁵

⁵² Government portal, 'Yulia Svyrydenko: A grant for the recovery of a business damaged by the war can be applied for through the Diia portal', 13.08.2025 (in Ukrainian), <https://www.kmu.gov.ua/news/yuliia-svyrydenko-hrant-na-vidnovlennia-biznesu-poshkodzhenoho-viinoiu-mozhna-oformyty-cherez-portal-diia>.

⁵³ ISAR Ednannia, 'The project supporting CSOs in frontline areas has been completed: we are summarising the results' (in Ukrainian), <https://ednannia.ua/novyny/nashi-novini/13065-pidtrimka-ogs-u-prifrontovikh-teritoriyakh-zaversheno-pidbivaemo-pidsumki>

⁵⁴ Liliya Viryovkina, lawyer and expert in legal and tax support for CSOs, Chair of the NGO "You Are Needed in Ukraine," during an interview on 15 September 2025.

⁵⁵ Law 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>.

Recommendations:

- The CMU should establish a support programme (in terms of coordination, financial resources, etc.) for CSOs affected by the armed aggression of the Russian Federation against Ukraine;
- The CMU, through its authorised bodies, should ensure equal access for CSOs to public procurement and promote the broad dissemination of information to CSOs regarding access to public procurement; and
- The NBU should facilitate CSOs' access to banking services on an equal footing with businesses, including for cross-border transactions and lending. It should also ensure communication with international financial institutions, including FATF, and foreign banks to mitigate restrictions on the basis of the armed aggression from the Russian Federation.

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. Ukrainian CSOs have been significantly affected by the reduction of U.S. funding programs, which has pushed them to seek new funding approaches and diversify their sources. One of the major challenges to accessing funding continues to be the tight control by banks over CSOs' activities, despite civil society experts advocating for banks and financial institutions to apply a risk-based approach. In 2025, providers of social services, including CSOs, were exempted from paying VAT.

The overall score in this area remains unchanged from the previous reporting period. In the current reporting period, key recommendations include rejecting remaining legislative initiatives that would restrict access to foreign funding, and promoting state support for the development of social services, including ensuring meaningful participation of CSOs in defining 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.

Ukrainian legislation does not prohibit CSOs from receiving foreign financial support. In 2025, Ukrainian CSOs were significantly affected by the suspension and subsequent termination of USAID program funding from the United States — a source that had been a key pillar of support in previous years in areas such as democracy, health, and social services. According to a survey conducted in February 2025, 25 per cent of Ukrainian CSOs reported being forced to reduce staff, 19 per cent placed employees on unpaid leave, and 42 per cent suspended or partially shut down programs due to frozen funding.⁵⁶ Some CSOs urgently turned to domestic sources of funding, such as concerned citizens and businesses for support.⁵⁷ For example, the support line

⁵⁶ ACAPS Analysis Hub, Thematic report 'Ukraine: implications of the US foreign aid cuts on humanitarian, development, and government-led programmes', 31 March 2025, https://api.home.ednannia.ua/upload/kch/25/04/04/20250331_ACAPS_Thematic_report_Ukraine_Implications_of_US_foreign_aid_cuts.pdf.

⁵⁷ Veteran Hub, 'Veteran Hub is reaching out to businesses for support' (in Ukrainian), <https://veteranhub.com.ua/events/veteran-hub-zvertaietsia-do-biznesu-po-pidtrymku/>.

and local branch of “Veteran Hub” within six days secured funding from socially responsible businesses to sustain operations in the coming months.⁵⁸ Independent media outlets were also heavily impacted.⁵⁹ Investigative journalism organisations such as *Slidstvo.Info*, *Bihus.Info*, and *Suspilne* lost portions of their funding but were later able to secure partial financial support through additional EU allocations.⁶⁰

CSOs are free to use new mechanisms to solicit financial contributions, such as electronic payment systems, Internet-based crowdfunding platforms, and different forms of donations, including electronic donations, cryptocurrency, etc. Also, CSOs can receive state funding through grant programmes, financial support of statutory activities, public procurement, and commissioning of social services. During the reporting period, CSOs continued to be involved in the procurement of social services within the activities of Resilience Centres, amounting to over UAH 600 million (approximately EUR 12.2 million),⁶¹ as well as services for social support for military personnel and their families. In 2025, the government took steps to facilitate the use of new support mechanisms, such as small-grant funding.

CSOs can also generate income through entrepreneurial and economic activities, for example, by selling their own services. One such initiative is *Good Bread from Good People*,⁶² which brings together over 70 people with intellectual disabilities to work in a bakery. However, this initiative, like many others, faces challenges in securing stable funding. These kinds of initiatives are increasingly seeking systemic support through fundraising platforms (such as Patreon) and partnerships with businesses.⁶³

In 2025, as in previous years, most CSOs continued to face challenges in accessing funding or support from various sources. Key barriers include the lack of sufficient experience among some organisations in preparing grant proposals and implementing projects in line with donor requirements. Additionally, certain areas of work — particularly projects aimed at supporting military personnel and veterans — remain difficult to implement due to restricted access to classified databases, the need for formal approvals from the Ministry of Defence, and the

⁵⁸ Liga.net, ‘Without U.S. Funding: How Veteran Hub Is Adapting to New Realities’, 11.03.2025 (in Ukrainian), <https://life.liga.net/poyasnennya/article/bez-finansuvannia-ssha-iak-veteran-hub-adaptuietsia-do-novykh-reality>.

⁵⁹ Suspilne Media, ‘USAID Halts Grant Funding: Which Ukrainian Cultural and Media Projects Are Forced to Shut Down’, 07.02.2025 (in Ukrainian), <https://suspilne.media/culture/935205-usaid-prizupinae-finansuvanna-za-grantami-aki-ukrainski-kulturni-ta-medijni-proekti-vimuseni-prizupiniti-robotu/>.

⁶⁰ Delegation of the European Union to Ukraine, ‘EU Boosts Support for Independent Media in Ukraine with an Additional €10 Million’, 21.03.2025, https://www.eeas.europa.eu/delegations/ukraine/eu-boosts-support-independent-media-ukraine-additional-%E2%82%AC10-million_en?s=232.

⁶¹ Ukrinform, ‘The government extended the project for the establishment of a network of Resilience Centers through 2025’, 10.12.2024 (in Ukrainian), <https://www.ukrinform.ua/rubric-society/3936446-urad-prodovziv-na-2025-rik-proekt-zi-stvorennja-merezi-centriv-zittestijkosti.html>.

⁶² *Good Bread from Good People: Inclusive platform* (in Ukrainian), <https://goodbread.com.ua/>.

⁶³ Good Bread from Good People’s post on Facebook, 15.07.2025 (in Ukrainian), <https://www.facebook.com/share/p/1CH1TYkXmz/?mibextid=wwXlfr>.

overall sensitivity of the sector. These factors limit CSO participation in such initiatives, even when funding is available.⁶⁴

It is important to note that the threshold above which VAT registration and liability is incurred for CSOs in Ukraine remains relatively low (UAH 1 million, or approximately EUR 20,528). Reaching the threshold creates difficulties for some CSOs due to the unreasonable additional control measures that are then imposed by state authorities.

Payment transactions by CSOs are carried out in accordance with the Law on Payment Services.⁶⁵ In 2025, experts reported that banks continue to impose additional burdensome requirements for verifying up-to-date client data in order to maintain account services.⁶⁶ These include requirements to provide information on the registered / declared place of residence of the CSO's founders (often, founders may not have continuing obligations to or connections with the CSO) and to provide copies of decisions made at the CSO's founding meetings.

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

In 2025, there were no special restrictions or procedures for CSOs to receive and use foreign and international funding or in-kind support, or for donors to provide funding to CSOs. However, CSOs continue to face practical restrictions from banks related to the use of foreign sources of funding. In 2025, experts continued to confirm limitations placed on cross-border financial transactions and banking financial monitoring measures, including the requirement to verify the targeted use of payments abroad.

There are certain specific obstacles (blocking, refusal, etc.) to financial transfers from abroad being made to CSOs whose tax addresses are located in areas temporarily occupied by the Russian Federation.⁶⁷

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. 3326⁶⁸ and

⁶⁴ Iryna Bieliaieva, expert at ISAR Ednannia, during consultations in September 2025.

⁶⁵ Law of Ukraine on Payment Services, No. 1591-IX, 15.11.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1591-20#Text>.

⁶⁶ Liliya Viryovkina, lawyer and expert in legal and tax support for CSOs, Chair of the NGO "You Are Needed in Ukraine," during an interview on 15 September 2025.

⁶⁷ 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.

⁶⁸ 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.

Draft Law No. 3564⁶⁹), which pose a threat by aiming to restrict the activities of organisations receiving foreign assistance, remain in place, having not yet been considered, rejected, or withdrawn in 2025, as was the case in the previous Reporting Period.

Recommendations:

- The Parliament of Ukraine should reject draft laws No. 3326, 3564 intended to worsen the legal environment for CSOs that receive foreign funding;
- The Ministry of Social Policy should ensure systematic support for the development and delivery of social services through the creation of a sustainable financing model that includes diverse sources (state, local, donor) and mechanisms (grants, social contracts, procurements); 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.

⁶⁹ 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/webprN0N0c4_1?pf3511=68977.

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 2025. In July 2025, the country was stirred by the "Cardboard Protest," which was held without incident and became a powerful example of influencing government through peaceful democratic means. At the local level, wartime restrictions vary significantly in form and scope depending on the region.

The overall score for the area of Freedom of Peaceful Assembly, as well as the scores for Legislation and Practice, remained the same as in 2024. In the coming period, recommendations aimed at establishing clear rules, which are based on a human rights approach, to govern the use of force and ensure 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 Ukraine⁷⁰ defines the right to peaceful assembly. Also, Article 315 of the Civil Code of Ukraine⁷¹ states that individuals have the right to freely assemble at peaceful assemblies, conferences, meetings, festivals, etc. There is no separate dedicated law regulating the organisation and holding of peaceful assemblies, however. According to experts,⁷² there is currently no urgent need to adopt a dedicated law on peaceful assembly because existing legal provisions are sufficient to enable the exercise of this right. Moreover, developing such legislation under martial law could potentially introduce new risks for the effective realisation of this freedom.

Due to the martial law regime currently in place in Ukraine, the right to freedom of peaceful assembly is not prohibited, but it may be restricted by the authorities, including local military

⁷⁰ Constitution of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/254%D0%BA/96-%D0%B2%D1%80#Text>.

⁷¹ The Civil Code of Ukraine (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/435-15?lang=en#Text>.

⁷² Tetyana Pechonchuk, Chairperson of the Board of the ZMINA Human Rights Center, during an interview on 8 September 2025.

administrations.⁷³ In 2025, a complete ban on peaceful assemblies remained in effect in four regions — Donetsk, Odesa, Ivano-Frankivsk, and Kherson — while partial restrictions were introduced in 11 other regions. In contrast, no general bans or special regulations were imposed in 8 regions or in the city of Kyiv.⁷⁴

The year 2025 witnessed a notable increase in protest activity. The most prominent issues that drew widespread public participation included:

Anti-corruption protests, also known as the “**Cardboard Protest**,” opposing Law No. 4555 (Draft Law No. 12414),⁷⁵ which was adopted by the Verkhovna Rada and signed by President Zelenskyy. The law was perceived as undermining the independence of the National Anti-Corruption Bureau (NABU) and the Specialised Anti-Corruption Prosecutor’s Office (SAPO). Demonstrations were held in regional capitals and other major cities across Ukraine.⁷⁶ In response, President Zelensky submitted a new draft law to Parliament restoring the independence of NABU and SAP, which was adopted and signed on 31 July 2025, and described by the President as an example of taking public opinion into account.

Protests by relatives of prisoners of war, civilian hostages, and missing persons, including weekly rallies under the banners “Free Azov” and “Don’t Be Silent. Captivity Kills”. These actions have been held since 2022 and aim to raise awareness about the dire conditions of members of the Azov Assault Brigade captured by Russian forces during the defence of Mariupol.⁷⁷

Student protests were also significant, especially those opposing a potential candidate for Minister of Education and Science of Ukraine. Demonstrations were initiated by students from the Kyiv School of Economics, the National University of Kyiv-Mohyla Academy, Lviv University, and others.⁷⁸ Additional student protests were held against the introduction of

⁷³ 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>.

⁷⁴OPORA, ‘Freedom of Peaceful Assembly under Martial Law in Ukraine’ (in Ukrainian),

<https://www.oporaua.org/vyborv/svoboda-mirnih-zibran-v-umovah-voyennogo-stanu-v-ukrayini-25639>.

⁷⁵ Law of Ukraine on Amendments to the Criminal Procedure Code of Ukraine Regarding the Peculiarities of Pre-Trial Investigation of Criminal Offenses Related to the Disappearance of Persons Under Special Circumstances During Martial Law. No. 4555-IX, 22.07.2025 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/4555-%D0%86%D0%A5#Text>.

⁷⁶ Suspilne Media, ‘For the second day in a row, protests have been taking place in Ukraine against a law that undermines the independence of the NABU and the SAPO’, 24.07.2025 (in Ukrainian), <https://suspilne.media/1074001-v-ukraini-drugij-den-protestiv-proti-zakonu-akij-nivelue-nezaleznist-nabu-ta-sap/>.

⁷⁷ Azov in Captivity initiative Instagram page (in Ukrainian), <https://www.instagram.com/initiative.freeazov/>.

⁷⁸ Ukrainska Pravda, ‘In Kyiv, students are protesting against the appointment of Vitrenko as Minister of Education and Science’, 14.07.2025, (in Ukrainian), <https://life.pravda.com.ua/society/u-kijevi-studenti-vimagayut-zvilniti-vitrenka-z-minosviti-309201/>.

harsher penalties for military personnel and the proposed establishment of a Military Ombudsman.⁷⁹

In **Kharkiv**, “KharkivPride” took place in early September 2025, including an “AutoPride” motor rally.⁸⁰ The events occurred without major incidents, although organisers reported⁸¹ receiving threats and alleged attempts by far-right groups to disrupt the events.⁸²

In **Kyiv**, “KyivPride” was held after a last-minute venue change,⁸³ which organisers attributed to pressure from the National Police (see also: Standard II – Freedom of Peaceful Assembly).

There were no recorded cases of dispersal of peaceful assemblies in 2025. A significant share of peaceful assembly participants were students and young people, demonstrating their high level of engagement in the socio-political process. For example, during the “Cardboard Protest,” the largest participant groups were aged 18–24 (40.4 per cent) and 25–34 (31.9 per cent), together making up over 70 per cent of attendees.⁸⁴ Experts note⁸⁵ that this is partly due to the perception among young people that the existing mechanisms for influencing decision-making are ineffective. For instance, youth appeals often receive little to no meaningful response, revealing a lack of genuine and open communication between the authorities and young people. Young people are compelled to resort to public demonstrations to attract attention and pressure decision-makers to address their concerns, as real solutions tend to emerge only under public scrutiny.

No individuals, groups, or CSOs are forced to participate in peaceful assemblies, nor are they prohibited from doing so. None are subjected to intimidation for planning, participating in, or abstaining from peaceful assemblies.

⁷⁹ DW Facebook page, ‘Several hundred people are protesting at Maidan Nezalezhnosti in Kyiv against tougher punishments for military personnel’, 25.09.2025 (in Ukrainian), <https://surl.li/pgtdob>.

⁸⁰ Suspilne Media, ‘In Kharkiv, a car rally was held on the final day of KharkivPride 2025’, 06.09.2025 (in Ukrainian), <https://suspilne.media/kharkiv/1108480-u-harkovi-proveli-avtoprobig-v-ostannij-den-kharkivpride-2025-fotoreportaz/>.

⁸¹ Gwara Media, ‘The organisers of KharkivPride reported receiving threats’, 29.08.2025 (in Ukrainian), <https://gwaramedia.com/organizatori-harkivprajdu-zavavili-pro-pogrozi/>.

⁸² ZMINA Human Rights Centre, ‘The organisers of KharkivPride reported plans by far-right groups to disrupt the PrideFest’, 29.08.2025 (in Ukrainian), <https://zmina.info/news/organizatory-harkivprajdu-povidomyly-pro-planu-ultrapravyyh-zirvaty-prajdfest/>.

⁸³ KyivPride Instagram page, Announcement from the KyivPride organisers about the new event location, 06.06.2025, <https://www.instagram.com/p/DKkbrEroboC/?igsh=MnM5NTI1bnJpcDht>.

⁸⁴ Vox Ukraine, ‘People with Cardboards: Who Were They and Why Did They Come Out? Results of a Survey of Protesters on Franko Square’, 28.08.2025, <https://voxukraine.org/en/people-with-cardboards-who-were-they-and-why-did-they-come-out-results-of-a-survey-of-protesters-on-franko-square>.

⁸⁵ Mykhailo Rak, Ukrainian Association of Students, during an interview on 10 September 2025.

Standard II. The state facilitates and protects peaceful assemblies.

The right to hold peaceful assemblies is generally clear, simple and free of charge. 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, but they can be determined at the local level.⁸⁶ However, in the summer of 2025, information spread about a Government decision according to which those planning to assemble, will be required to coordinate mass events. The required coordination was proposed to be carried out in the regions with the military commanders, and in Kyiv with the General Staff of the Armed Forces of Ukraine.⁸⁷ This was criticised by the public and CSOs because it could create a risk of arbitrary or politically motivated enforcement, as well as imposing excessive procedural requirements that could undermine the right to peaceful assembly, especially under martial law.⁸⁸ Currently, there is no information about the likely implementation of this initiative.

The martial law regime imposes specific conditions at the level of individual regions or communities. The most common forms of restrictions include requirements for: (i) prior approval from authorities or security agencies; (ii) submission of detailed information about the event; (iii) compliance with additional security measures; and (iv) notification deadlines. In some regions, there are limits on the number of participants or requirements for the presence of shelters in the vicinity of the assembly place.⁸⁹ In 2025, the organisation of most peaceful events—including anti-corruption rallies, student protests, and demonstrations by relatives of military personnel—proceeded without obstacle, with law enforcement often ensuring security without excessive interference.

At the same time, there have been instances of insufficient transparency and actions perceived by the public as obstruction. For example, during “KyivPride,” organisers reported⁹⁰ pressure from the police and a lack of official information regarding the alleged terrorist threat. This led to the cancellation of the public event while it remained unclear whether the threat was real or whether the police were spreading unverified information without providing adequate

⁸⁶ 4.3.7. The right to peaceful assembly: Constitutional Court of Ukraine, <https://ccu.gov.ua/storinka-knygy/437-pravo-na-myrni-zibrannya>.

⁸⁷ Ukrainska Pravda, ‘The Cabinet of Ministers has required mass events to be coordinated with military authorities’, 28.08.2025 (in Ukrainian), <https://www.pravda.com.ua/news/2025/08/28/7528306/>.

⁸⁸ ZMINA Human Rights Centre, ‘Approval of Mass Events: Are There Threats to Peaceful Assembly?’, 29.08.2025 (in Ukrainian), <https://zmina.info/columns/pogodzhennya-provedennya-masovyh-akcij-chy-ye-zagrozy-dlya-myrnogo-zibrannya/>.

⁸⁹ OPORA, ‘Freedom of Peaceful Assembly under Martial Law in Ukraine’, 06.03.2025 (in Ukrainian), <https://www.oporaua.org/vybory/svoboda-mirnih-zibrani-v-umovah-voyennogo-stanu-v-ukrayini-25639>.

⁹⁰ KyivPride Instagram page, Statement on police pressure, 05.06.2025 (in Ukrainian), https://www.instagram.com/p/DKh_rwZoJjY/?img_index=1.

protection. This raised concerns about selective state support in the implementation of the freedom of assembly.⁹¹

There is no legislation that forbids the use of electronic means of communication to organise peaceful assemblies. Peaceful assemblies are not prevented via restrictions on access to social media, 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. However, the legislation still does not clearly define the responsibilities of law enforcement bodies, other state bodies or local self-government bodies in relation to peaceful assemblies. In contrast, Article 12 of the Law on the National Guard of Ukraine⁹² sets out 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 Police⁹³ are generally defined as ensuring public security and order, but without further specification. Further information, mainly related to the specifics of the martial law regime, are available at the level of individual territorial communities. State authorities do not collect fees for allowing the holding of 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 such dissemination. For example, the vast majority of Ukrainian online media reported on the Anticorruption protests against the law concerning NABU and SAP, although they did so with varying levels of detail, tone, and emphasis.⁹⁴

⁹¹ ZMINA Human Rights Centre, 'KyivPride will not cancel the Equality March: organisers are open to compromise but demand security guarantees', 12.06.2025 (in Ukrainian), <https://zmina.info/news/kyivprajd-ne-skasovuvatyme-marsh-rivnosti-organizatory-gotovi-do-kompromisu-ale-vymagayut-garantij-bezpeky/>.

⁹² Law on the National Guard of Ukraine, No. 876-VII, 13.03.2014 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/876-18#top>.

⁹³ Law on the National Police, No. 580-VIII, 02.07.2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/580-19#top>.

⁹⁴ Institute of Mass Communication, 'The NABU and SAP Law and Protests: How the Media Covered the Situation (Updated)', 24.07.2025 (in Ukrainian), <https://imi.org.ua/monitorings/zakon-pro-nabu-ta-sap-i-protesty-yak-sytuatsiyu-vysvitlyuvaly-media-i69479>.

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

As of 2025, there is no specific document that governs the use of force by law enforcement 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 ensure public safety and the protection of public order during peaceful assemblies. In 2025, the Department of Preventive Activities continued to operate within the structure of the National Police of Ukraine. Its tasks include coordinating the activities of, and providing organisational and methodological assistance to, law enforcement authorities organising the provision of public security and order during peaceful gatherings and providing public education on the holding of peaceful assemblies.⁹⁵

Although no mass unlawful detentions or excessive use of force were recorded in 2025, experts point out⁹⁶ that law enforcement authorities do not always fulfil their positive obligation to protect peaceful assemblies. In particular, during preparations for KyivPride, pressure was exerted (including threats to destroy property) on the landlords of the venue where the event was supposed to be held. Communication from law enforcement regarding security threats was also insufficient. According to the organisers, despite the declared terrorist threat, although the police formally fulfilled their duties, they did so without making real efforts to facilitate the event, raising suspicions of possible political motivation.⁹⁷

Excessive use of force against participants in peaceful assemblies is a crime under Article 365 of the Criminal Code ('abuse of power or official duties by a law enforcement officer').⁹⁸ Criminal legislation also provides for liability for obstructing the organisation or holding of peaceful assemblies under Article 340 of the Criminal Code.

⁹⁵ National Police of Ukraine, 'Department of Preventive Activities' (in Ukrainian), <https://www.npu.gov.ua/pro-policiju/struktura-nacionalnoyi-policiji/departament-preventivnoyi-diyalnosti>.

⁹⁶ Tetyana Pechonchuk, Chairperson of the Board of the ZMINA Human Rights Center, during an interview on 8 September 2025.

⁹⁷ KyivPride Instagram page, An appeal to the guests and partners of KyivPride Park, 06.06.2025 (in Ukrainian), https://www.instagram.com/p/DKjpwIP1I8w/?img_index=1&sigsh=aH11bG1wZDIrdH1z.

⁹⁸ Criminal Code of Ukraine, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

Recommendations:

- The Parliament should develop and adopt a law aimed at aligning with international standards for regulating the right to freedom of peaceful assembly, in order to improve the work of local self-government bodies and executive authorities in facilitating the exercise of this right. The law should provide appropriate guarantees for participants in peaceful assemblies and establish clear rules for interaction between public authorities and participants, while maintaining a balance between freedom of assembly and the protection of public order;
- 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 martial law regime 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 participate in the decision-making process. The Law “On Amendments to Certain Laws of Ukraine on People’s Power at the Level of Local Self-Government” was signed by the President and entered into force in 08 January 2025. The Law “On Lobbying,” which came into effect on 1 September 2025, remains in the focus of CSOs due to concerns about its potential use as a tool to impose pressure on them. Attempts to introduce amendments to the Law before its implementation were recorded, but they were rejected.

Practical challenges for CSOs continue to relate to the unsatisfactory level of government openness, selective approaches to, as well as insufficient engagement with, CSOs at the early stages of the legislative process, and deficiencies in monitoring and evaluating the implementation of new laws.

As a result, the score for Legislation in this area has not changed as compared to 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. The state should adopt Draft Law No. 6319, which regulates self-organisation bodies of the population.⁹⁹ Finally, monitoring of the implementation of the Law of on Lobbying remains necessary.

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,¹⁰⁰ the CMU Resolution on Ensuring Public Participation in the Formation and Implementation of State Policy¹⁰¹ and the CMU Resolution on Approval of the Procedure for Facilitating Public Expertise of the Activities of Executive Authorities¹⁰². In 2025, in practice, public consultations, despite being mandatory, were not always conducted.

⁹⁹ 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.

¹⁰⁰ 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>.

¹⁰¹ 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>.

¹⁰² Resolution of the CMU on Approval of the Procedure for Facilitating Public Examination of the Activities of Executive Authorities, No. 976, 05.11.2008 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/976-2008-n#Text>.

Public participation on local level is further enabled via the Law on Ensuring Transparency of Local Self-Government,¹⁰³ which provides for, among other things, the mandatory adoption of local council regulations, the video recording and broadcasting of plenary sessions in real time, and how to fulfill the obligation of informing the public. The restoration¹⁰⁴ of online broadcasts of the Parliament in 2025¹⁰⁵ and the obligation to broadcast local council meetings are unequivocally positive changes that enhance government accountability. However, this obligation remains only partially implemented. Not all bodies conduct live streaming and there are certain exceptions to its application.

Another important law from 2025, on local level regarding public participation, is Law No. 3703-XI¹⁰⁶ which: (i) defines the main forms of participation by territorial communities in resolving local issues; (ii) details the procedure for their implementation; (iii) requires the mandatory adoption of community statutes; and (iv) recognises internally displaced persons (IDPs) as community residents. This law was signed by the President and entered into force on 8 January 2025. Experts regard its entry into force as a major step forward in creating opportunities to participate in and influence decision-making processes at the local level.¹⁰⁷ At the same time, they note the need for implementation through various mechanisms, including statutes, by-laws, and training. Experts working at the local level have confirmed that communities have begun updating their statutes in accordance with the new provisions, which require the adoption of statutes by the end of 2026. However, concerns have been raised regarding the methodological guidelines provided at the central level.

In 2025, the Draft Law on Amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' to Improve the Procedure for the Organisation, Activity, and Termination of Bodies of Self-Organisation of the Population (Government Draft Law No. 6319¹⁰⁸) was finalised and prepared for a second reading. Specifically, this law aims to clarify the rights and responsibilities of self-organisation bodies, streamline procedures for citizen engagement at

¹⁰³ 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>.

¹⁰⁴ ZMINA Human Rights Centre, 'Stefanchuk signed a resolution on the resumption of broadcasts of the Verkhovna Rada sessions', 10.09.2025 (in Ukrainian), <https://zmina.info/news/stefanchuk-pidpysav-postanovu-pro-vidnovlennya-translyaczij-zasidan-verhovnoyi-rady/>.

¹⁰⁵ Resolution of the Verkhovna Rada of Ukraine on Certain Issues of Coverage of the Activities of the Verkhovna Rada of the Ninth Convocation, 04.09.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4597-IX#Text>.

¹⁰⁶ 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. 3703, 05.05.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3703-IX#Text>.

¹⁰⁷ Stated by civil society experts with experience in the relevant fields during CSO Meter focus group studies conducted in September 2025.

¹⁰⁸ Draft Law on Amendments to the Law of Ukraine 'On Bodies of Self-Organisation of the Population' to Improve the Procedure for the Organisation, Activity, and Termination of Bodies of Self-Organisation of the Population, No. 6319, 18.11.2021 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/28346>.

the local level, and strengthen mechanisms through which CSOs and residents can influence local decision-making processes. The refinement of the Draft Law was carried out by a working group which includes experts from civil society, with regular announcements of meetings and progress summaries.¹⁰⁹ This Draft Law is considered essential given the complexity of ensuring public and CSO participation in decision-making. The legislation does not provide criteria for selecting participants in consultations. In practice, all CSOs, including unregistered organisations, may participate.

Experts note¹¹⁰ that, in 2025, the overall level of openness of the Parliament of Ukraine, the Cabinet of Ministers of Ukraine and the Office of the President of Ukraine with respect to including civil society in decision-making remains insufficient. Interaction exists only in relation to certain areas of cooperation between the state and CSOs. For example, access to the work of parliamentary committees remains problematic, as the participation of CSOs and journalists depends on the goodwill of the committees themselves (which are empowered to invite participants, allow them to speak, or fully restrict access).

In addition, in 2025, work on Ukraine's EU accession process intensified. The European Commission also recognises CSOs as a driving force behind reforms and European integration. At the same time, the current consultation format, despite the creation of government working groups by accession negotiation chapters, is in some cases formal and fragmented. Discussions often consist of presenting already-prepared decisions, with a lack of transparency, public protocols, systematic feedback, or a coordinated schedule, while the choice of topics is selective. Human rights organisations, in particular, stress the need to adopt standards for participation.¹¹¹ In this context, it is also worth noting Draft Laws No. 13653¹¹² and No. 13653-1¹¹³, which propose introducing a procedure for initiating and reviewing EU integration-related draft laws. However, they do not provide for mechanisms to involve CSOs and the expert

¹⁰⁹ The Working Group of the Committee on the Review and Preparation for the Second Reading of the Draft Law on Improving the Procedure for the Organisation, Activity, and Termination of Bodies of Self-Organisation of the Population (registration No. 6319), 22.09.2025 (in Ukrainian), https://www.rada.gov.ua/news/news_kom/266232.html. This working group discussed the key aspects of the current legal and regulatory framework governing the establishment of bodies of self-organisation of the population.

¹¹⁰ Tetiana Pechonchyk, Chairperson of the Board of the ZMINA Human Rights Center, during an interview on 8 September 2025.

¹¹¹ ZMINA Human Rights Centre, Joint statement of human rights CSOs on involvement in the consultation process with the government of Ukraine on Ukraine's path towards EU accession, 18.09.2025, <https://zmina.ua/en/statements-en/joint-statement-of-csos-working-in-the-field-of-human-rights-on-involvement-in-the-consultation-process-with-the-government-of-ukraine-on-ukraines-path-towards-eu-accession/>.

¹¹² Draft Law on Amendments to Certain Legislative Acts of Ukraine Aimed at Improving the Procedures for Adapting Ukrainian Legislation to the Law of the European Union (EU acquis), No. 13653, 17.08.2025 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/57105>.

¹¹³ Draft Law on Amendments to Certain Legislative Acts of Ukraine Concerning the Procedure for Preparing, Initiating, Considering, and Adopting Euro-Integration Draft Law, No. 13653-1, 01.09.2025 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/57229>.

community in these processes. Under accelerated procedures, this lack of involvement may negatively affect the quality of legislative decisions.

There were no reported repercussions in 2025 against CSOs that participate in decision-making processes (see also Standard IV for additional reference). 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.

One of the pressing issues in 2025 remained the delayed entry into force of Law No. 3841-IX,¹¹⁴ which provides for the involvement of stakeholders in decision-making through public consultations at all stages — from problem identification, development, and policy formulation to implementation and addressing issues of local importance in relevant areas of public life. The law stipulates that these requirements will take effect only 12 months after the end of martial law. As a result, authorities may not apply its provisions and, consequently, may fail to engage CSOs. This creates uncertainty and slows the practical implementation of public consultations. Moreover, its provisions do not establish an obligation for Members of Parliament of Ukraine to conduct consultations.

Throughout 2025, government bodies continued to use consultation mechanisms such as electronic/online consultations, working groups, meetings, and roundtables. Expert assessments¹¹⁵ of government consultations with civil society in 2025 vary: some consider that the format has not significantly changed, others note even lower levels of CSO input being considered compared to previous years. Some positive examples are also recorded — for instance, at the beginning of the year, meaningful consultations took place between the CMU Secretariat and CSOs regarding the implementation plan of the National Strategy to Promote Civil Society Development for 2025–2026, after which a significant portion of the proposals from CSOs were taken into account. Another example is the joint holding of public consultations by the Parliament Committee on Legal Policy and the public organisation “Republic Institute,” UCIRP, on the Draft Law on Amendments to Certain Laws of Ukraine regarding the Regulation and State Registration of Public Organisations (Reg. No. 8084).¹¹⁶

¹¹⁴ Law on Public Consultations, No. 3841-IX, 20.06.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3841-20#Text>.

¹¹⁵ Stated by civil society experts with experience in the relevant fields during CSO Meter focus group studies conducted in September 2025.

¹¹⁶ Legal Policy Committee of Verkhovna Rada, Information document on public consultations, ‘Law for Civil Society Organisations: New Opportunities’, 10.02.2025 (in Ukrainian), https://kompravpol.rada.gov.ua/news/main_news/75597.html.

At the local level, citizen participation in decision-making is regulated by the Law on Local Self-Government in Ukraine,¹¹⁷ as well as by the statutes and normative acts of specific communities. Experts noted¹¹⁸ that, in 2025, involvement in decision-making remains heterogeneous: some communities practice engagement and transparency, while in others consultations are virtually non-existent or merely formal. In frontline communities, online surveys and questionnaires have become the primary tool for interaction, while informal formats, such as picnics, community workdays, interactive maps, or meetings following joint activities, have proven highly effective for gathering opinions and building trust in relatively safe areas. Regression at the local level is considered by experts to be due, in part, to lack of resources, dependence on the positions of specific officials, restrictions imposed by martial law, and the passivity of CSOs themselves. Moreover, at the local level, public engagement largely occurs through personal contacts between local self-government bodies and CSOs, established in previous years, while systematic procedures for engagement still do not exist.

The activities of advisory bodies under state authorities and local self-government generally do not limit the ability of CSOs to participate in public consultations. A positive example is the work of the Advisory Council on Internally Displaced Persons (IDPs).

CSOs are still not always invited to participate in decision-making processes at the earliest possible stage, which can hamper effective participation. In 2025, some central executive authorities conducted expert consultations, including the collection of proposals through online forms or expert working group formats. For example, the Ministry of Justice did so with respect to the updated version of the National Human Rights Strategy, as did the Ministry for Communities and Territories Development regarding the State Strategy for Internal Displacement. At the same time, multi-stage discussions do take place: from developing a vision to coordinating the document with partners, donors, and within the government. An example is the development of the Employment Strategy of Ukraine 2030.¹¹⁹ However, it remains challenging to ensure the possibility of making meaningful conceptual changes to the strategy document at the early stages and during its development.¹²⁰

State authorities and local self-government organisation in 2025 continued to vary in how they publish CSO proposals and provide feedback. Mostly, CSOs do not receive responses on

¹¹⁷ 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>

¹¹⁸ Stated by civil society experts with experience in the relevant fields during CSO Meter focus group studies conducted in September 2025.

¹¹⁹ Government portal, 'New labour market policy: Ukraine presented the vision of the 2030 National Employment Strategy', 04.07.2025 (in Ukrainian), <https://www.kmu.gov.ua/news/nova-polityka-dlia-rynku-pratsi-v-ukraini-predstavleno-viziiu-stratehii-zainiatosti-naselennia-2030>.

¹²⁰ Ksenia Gedz, advocacy coordinator of the CF Right to Protection, during consultations in September 2025.

submitted proposals in a “taken into account/not taken into account” format with corresponding justification.

Focus groups confirmed that systematic CSO involvement in monitoring public policy decisions was not carried out in 2025. Difficulties also remain with the monitoring and evaluation process itself on the part of authorities. Some organisations continue to use open data sources for their own indices and assessments. In some regions, parts of the control function have been taken over by the media (for example, Kherson).

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 Information¹²¹ and the Law on Information¹²². 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.¹²³

In practice, CSOs still mostly obtain access to information through the official websites of state institutions and by sending formal requests for access to public information. It is possible to submit such requests through the websites of some state and local authorities. For example, requests to the Parliament of Ukraine, MPs can be submitted through the platform for electronic requests available on the Parliament’s website.¹²⁴ The same possibility is provided on the website of the Ministry of Education and Science of Ukraine.¹²⁵ At the same time, some authorities, for example, the Ministry for Development of Communities and Territories,¹²⁶ which, in theory allows the submission of electronic requests via its website, have not resumed this practice in 2025. Submissions are made directly via email.

Cases of unreasonable refusals or untimely responses remain isolated. In 2025, information about draft legal acts, as well as notifications about public hearings or discussions of draft regulations, continues to be published. On the official websites of the government and central

¹²¹ 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>.

¹²² Law of Ukraine on Information, No. 2657-XII, 02.10.1992 (in Ukrainian),

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

¹²³ Resolution of the CMU on Approval of the Rules of Procedure of the Cabinet of Ministers of Ukraine, No. 950, 18.07.2007 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/950-2007-n#top>.

¹²⁴ Verkhovna Rada of Ukraine: electronic appeals (in Ukrainian), <https://itd.rada.gov.ua/appeal-of-citizens-new/Appeals/createEditAppeal>.

¹²⁵ Ministry of Education and Science of Ukraine: request for access to public information (in Ukrainian), <https://mon.gov.ua/ministerstvo/hromadskosti/dostup-do-publichnoi-informatsii/forma-dlia-podannia-zapytu-na-otrymattia-publichnoi-informatsii?v=670632af9d693>.

¹²⁶ The Ministry for Development of Communities and Territories of Ukraine, Electronic appeals (in Ukrainian), <https://mtu.gov.ua/content/elektronne-zvernennya.html>.

executive authorities,¹²⁷ indicative plans for public consultations are published (indicating their subject, approximate timeframe, consultation format, and contact details of responsible persons). However, these tend not to be updated. Each institution independently decides which draft legal acts to put up for public discussion and where on their website to host them, resulting in a lack of standardisation across institutions. For example, throughout 2025, the Ministry of Social Policy regularly published draft legal acts for public consultation and followed good practice by reporting on the number of submitted proposals, objections, and other feedback received.¹²⁸ The collection of proposals and comments on draft legal acts is also carried out by the Ministry of Education and Science, although announcements are published in the news section,¹²⁹ which complicates searchability (even with filters) due to the large volume of information.

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 2025, CSOs were 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 1 September 2025, the Law on Lobbying came into force.¹³⁰ This 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.

During its preparation in 2024, the Law caused significant concern among CSOs, especially at the local level. Those concerns remain relevant. CSOs¹³¹ are concerned that there is a risk of authorities misinterpreting advocacy activities as political or commercial lobbying. This uncertainty also creates a threat to civic engagement, particularly in wartime conditions. For some organisations, the Law on Lobbying is viewed more as a risk than an opportunity, although potential benefits were also mentioned — for example, CSOs could obtain additional financing by changing some of their activities to commercial lobbying.

¹²⁷CMU, Indicative plans for public consultation on the websites of executive authorities (in Ukrainian), <https://www.kmu.gov.ua/gromadskosti/gromadyanske-suspilstvo-i-vlada/konsultaciyi-z-gromadskistyuu/oriyentovni-plani-konsultacij-z-gromadskistyuu-na-sajtah-organiv-vikonavchoyi-vladi>.

¹²⁸ Ministry of Social Policy, Family and Unity of Ukraine, Draft legal acts (in Ukrainian), <https://www.msp.gov.ua/legislation/draft-legal-acts>.

¹²⁹ Ministry of Education and Science of Ukraine, news (in Ukrainian), <https://mon.gov.ua/timeline?&type=posts>.

¹³⁰ Law of Ukraine on Lobbying, No. 3606-IX, 23.02.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3606-20#Text>.

¹³¹ CSO Meter focus groups participants during meetings held on 15 and 16 September 2025.

In June 2025, the Parliamentary Committee on Legal Policy (Chair – Denys Maslov) initiated and submitted for consideration and public consultations a package of two related draft laws: No. 13340¹³² and No. 13339¹³³. The drafts proposed amendments to the Law on Lobbying, which had not, at that time, yet entered into force. The proposed changes envisage the postponement of certain mandatory reporting requirements and administrative liability in the field of lobbying, as well as simplification to the procedures for access to public authorities. They also propose the introduction of a lobbying request as a mechanism for obtaining information about the lobbying organisation, as well as the expansion of the legal status of lobbying subjects, among other measures. According to national and international experts, making any changes to the Law on Lobbying at this stage would be inappropriate and premature until the law fully enters into force, including the development and implementation of any corresponding subordinate regulations.¹³⁴ Draft Law No. 13340 was rejected by the Committee, while Draft Law No. 13339 proceeded but was not adopted by Parliament on 4 September 2025.

Experts note¹³⁵ that although the short time since the Law on Lobbying came into force means that there are yet no practical cases of its application regarding CSOs, this does not eliminate the risks relating to its use in the future. Overall, CSOs consider the Law on Lobbying to be unnecessary and to be without any clear benefits for CSOs and ultimately for citizens. They also note that it consumed a significant amount of effort and time of different stakeholders in discussions, and continues to represent more of a potential threat than an advantage.

¹³² Draft Law on Amendments to Certain Legislative Acts of Ukraine Regarding the Clarification of Liability for Violations of Lobbying Legislation, No. 13340, 03.06.2025 (in Ukrainian), https://itd.rada.gov.ua/billInfo/Bills/Card/56519?fbclid=IwY2xjawK1Ge1leHRuA2FibQIxMABicmlkETFZWURONDE2OUhGbTM4Q3VUAR6_nEmou5QkO96KmesJYGonlAkUmoLfhK6hNsG5OiqnGwDqOp6b5JVbQrYi0A_aem_7D2wLKx_0W5G4C08sHweJQ.

¹³³ Draft Law On Amendments to the Law of Ukraine 'On Lobbying' Regarding the Clarification of Certain Provisions, No. 13339, 03.06.2025 (in Ukrainian), https://itd.rada.gov.ua/billInfo/Bills/Card/56523?fbclid=IwY2xjawK1GnNleHRuA2FibQIxMABicmlkETFZWURONDE2OUhGbTM4Q3VUAR4egYce1EBQcKaGoSS5ms7s5vpTvLvh9W_yaTub1Bhdc89tmpKhKOBn4CxybA_aem_zLzHpIQDgtCB8z5LQOghXg.

¹³⁴ CEDEM, 'And again on lobbying: key chronological milestones of Draft Laws No. 13339 and No. 13340', 24.06.2025 (in Ukrainian), <https://cedem.org.ua/analytics/lobizm/>.

¹³⁵ Tetiana Pechonchuk, Chairperson of the Board of the ZMINA Human Rights Center, during an interview on 8 September 2025.

Recommendations:

- The Parliament of Ukraine should adopt Draft Law No. 6319, which provides for the improvement of procedures 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, implement it immediately, and define the obligation of MPs to hold public consultations;
- The CMU and other bodies of central executive power should ensure the systematic and continuous involvement of CSOs in the development of public policy documents, including those related to Ukraine's EU integration. 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;
- 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 to limit access to information only after using the three-fold test provided for in Part 2 of Article 6 of the Law;
- 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; and
- Local self-government authorities should adopt the statutes of communities, including all prescribed procedures, by the end of 2026.

3.6 Freedom of Expression

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

Legislation: **5.4** / 7

Practice: **4.1** / 7

The right to freedom of expression is protected by law, although it is subject to restrictions under martial law. There are no restrictions on the free use of the Internet or other communication tools, and clear safeguards and guarantees against censorship exist. However, cases of persecution of activists fighting corruption, illegal construction, and environmental activists have been reported, including pressure exerted through social networks. Significant concern is raised by Draft Laws No. 14057, No. 12320 (submitted for the President's signature), and No. 7033-d, which potentially limit freedom of speech, introduce elements of censorship pre-publication, and expand legal liability for publications that are critical [of the state].

The Russian Federation continues its practice of illegal actions against the media as an element of warfare. Media representatives, journalists, and activists have been affected by hostilities (with individuals having been killed or wounded), and editorial offices have suffered damage from attacks. Furthermore, media outlets were affected by funding cuts that took place in 2025.

The area of 'Freedom of Expression' saw a slight decline compared to 4.9 in 2024 to 4.8 in 2025.

The recommendation remains to continue investigations and properly document crimes, and to avoid restricting freedom of expression through the adoption of certain draft laws.

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 disproportionate consequences or sanctions for the expression of opinions and views. There are also no sanctions for the dissemination of information that would meet the broad definition of 'fake news' or 'disinformation' that is not verified by the state. Due to the current imposition of martial law in Ukraine,¹³⁶ the right to freedom of expression may be restricted and the

¹³⁶ 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>.

military¹³⁷ may regulate the work of relevant institutions. Examples of this include a directive not to disclose information about prisoners of war and the rules for filming in hospitals during martial law.

On 14 January 2025, the Parliament approved Draft Law No. 11321 on Parliamentary transparency,¹³⁸ which introduces mandatory online broadcasting of parliamentary committee work, expanded rights for journalists during martial law, and enhanced transparency and accountability. At the time of drafting this report, the Draft Law has not yet been signed by the President of Ukraine.¹³⁹ Public and media organisations have urged the President not to violate the Constitution and to sign Draft Law No. 11321 on Parliamentary transparency.¹⁴⁰

Despite the ongoing armed aggression, Ukraine maintains a relatively high position in Reporters Without Borders' World Press Freedom Index for 2025.¹⁴¹ Ukraine ranked 62nd out of 180 countries (in 2024, it ranked 61st). CSOs and associated persons are free to seek, receive, and disseminate information and ideas through any media channels. Media organisations are required to provide their employees with protection against possible gunshot and shrapnel injuries. On 14 July 2025, Law No. 4016-IX¹⁴² came into force, aligning previous requirements with new insurance rules that allow media organisations to insure their staff while working in combat zones, either using their own funds or external sources such as grants. In the previous Reporting Period, this type of mandatory insurance was effectively “non-operational,” as the necessary detail was not provided for in the Law on insurance.¹⁴³ In 2025, insurance coverage was provided through a special fund¹⁴⁴ supported by foreign sources. However, a

¹³⁷ 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>.

¹³⁸ Draft Law on Amendments to Certain Laws of Ukraine to Strengthen Certain Guarantees for Access to Information for Media Activities, Journalists, and Citizens, No.11321, 05.06.2024 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/44362>.

¹³⁹ CSO Meter, 'Ukraine: Draft law seeks greater public oversight and media freedoms', 30.01.2025, <https://csometer.info/updates/ukraine-draft-law-seeks-greater-public-oversight-and-media-freedoms>.

¹⁴⁰ Chesno Movement, Statement 'We urge the President not to violate the Constitution and to sign Law No. 11321 on the openness of the Verkhovna Rada of Ukraine', 20.03.2025 (in Ukrainian), <https://www.chesno.org/post/6362/>.

¹⁴¹ Reporters Without Borders, '2025 World Press Freedom Index', (2025), <https://rsf.org/en/country/ukraine>.

¹⁴² Amendments to Article 15 of the Law of Ukraine on State Support of Media, Guarantees of Professional Activity, and Social Protection of Journalists, No. 4016-IX, 10.10.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4016-IX#Text>.

¹⁴³ Law of Ukraine on insurance, No. 1909-IX, updated 01.01.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1909-20#Text>.

¹⁴⁴ International Journalists' Insurance Fund. The project is implemented by the Association "Independent Regional Publishers of Ukraine" and Voices of Ukraine as part of Hannah-Arendt-Initiative, with financial support from the European Centre for Press and Media Freedom (ECPMF) and Federal Foreign Office Germany, (in Ukrainian), <https://war-correspondent.info/>.

comprehensive policy, including the creation of special insurance programs for journalists, media staff, and fixers working under combat conditions, remains absent.¹⁴⁵

A number of media outlets were forced to cease operations due to Russian military action (at least 329 editorial offices disappeared from the information space during the first 1,000 days of the Russian invasion^{146, 147}) and the cessation of grant support (e.g., USAID, IREX projects). The impact was particularly acute for regional media, whose budgets were largely dependent on grants, significantly limiting the diversity of voices and undermining freedom of expression in affected communities.

There were no records during the reporting period of cases of persecution or conviction of journalists, activists, or representatives of CSOs for creating or disseminating “false news” or “disinformation”. However, significant concern arises from Draft Law No. 14057,¹⁴⁸ registered on 21 September 2025, which aims to systemically update the institution of personal non-property rights, establish a modern and effective system for the legal protection of intangible assets of individuals and legal entities, and harmonise Ukraine’s civil legislation with European human rights standards. However, it also introduces elements of prior censorship and excessively strict requirements for media (including content blocking), thereby increasing the risk of pressure, self-censorship, and abuse.¹⁴⁹ In response, the Chair of the Parliamentary Committee on Freedom of Speech, Yaroslav Yurchyshyn, withdrew his signature from Draft Law No. 14057 and initiated a joint working meeting on 3 October 2025 with media lawyers, MPs, and representatives of media and human rights organisations, during which a consensus was reached to prepare a package of amendments for the second reading aimed at ensuring a balance between freedom of expression, the right to privacy, and the protection of dignity.¹⁵⁰

¹⁴⁵ Ihor Rozkladay, Chief Expert in Media Law and Social Media Content Moderation at CEDEM, during an interview on 05 September 2025.

¹⁴⁶ ZMINA Human Rights Centre, ‘My Life’s Work: How the War Is Destroying Ukrainian Media’, 05.09.2025 (in Ukrainian), <https://zmina.info/articles/moya-sprava-zhyttya-yak-vijna-znyshhuye-ukrayinski-media/>.

¹⁴⁷ Institute of Mass Information, ‘329 Ukrainian media outlets have closed since the beginning of Russia’s full-scale invasion’, 18.11.2024 (in Ukrainian), <https://imi.org.ua/monitorings/329-ukrayinskyh-media-zakrylys-z-pochatku-povnomasshtabnogo-vtorgnennya-rf-doslidzhennya-imi-i64960>.

¹⁴⁸ Draft Law on Amendments to the Civil Code of Ukraine in connection with the update (recodification) of the provisions of Book Two, No. 14057, 21.09.2025 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/57355>.

¹⁴⁹ Institute of Mass Information, ‘The International Press Institute urges the Parliament not to adopt Draft Law No. 14057’, 26.09.2025, <https://imi.org.ua/en/news/mizhnarodnij-institut-presi-zaklika%1%94-radu-ne-uhvalyuvati-zakonopro%1%94kt-%e2%84%96-14057>.

¹⁵⁰ Institute of Mass Information, ‘MPs and media organisations have agreed to jointly prepare amendments to draft law No. 14057 between the first and second readings’, 03.10.2025 (in Ukrainian), <https://imi.org.ua/news/deputaty-ta-mediaorganizatsiyi-domovylsya-spilno-pidgotuvaty-pravky-do-14057-mizh-pershym-i-drugym-chytannjam>.

The expression of ideas, opinions, and positions that do not align with official policy or that criticise official policy is not restricted by the state. However, cases of discrediting campaigns and pressure on journalists do exist. For example, anti-corruption activist Vitalii Shabunin,¹⁵¹ who is in active military duty, received from the State Bureau of Investigation a notice of suspicion of draft evasion, and investigative journalist Olena Mudra¹⁵² faced a smear attack on social media.

Experts also note¹⁵³ obstacles such as spam, attacks on social media pages, installation of surveillance, and pressure on advertisers, although the credibility of these reports is difficult to verify. Lawsuits for the protection of business reputation have also been used, for instance against public activist Mykhailo Berchuk.¹⁵⁴ Furthermore, on 21 September 2025, a group of MPs submitted Draft Law No. 14057¹⁵⁵ to the Parliament, which proposes numerous amendments to the Civil Code of Ukraine. Bihus.Info reported that analysis shows that this Draft Law increases legal liability for critical publications and could put investigative journalism at risk.¹⁵⁶

Against this backdrop, systemic problems in the information space are evident due to an imbalance of state policy: the Public Broadcaster remains underfunded (the 2025 State Budget allocates UAH 2.18 billion (approx. 45 million EUR) for the Public Broadcaster; significantly less than 0.2 per cent of total budget expenditures¹⁵⁷). This only allows it to maintain current

¹⁵¹ Suspilne Media, 'The head of the Anti-Corruption Center, Shabunin, has been suspected of draft evasion and fraud – what is known', 12.07.2025 (in Ukrainian), <https://suspilne.media/1065171-golovu-centru-protidii-korupcii-sabunina-zapidozrili-v-uhilanstvi-j-sahrajstvi-so-vidomo/>.

¹⁵² Institute of Mass Information, 'Journalist from Zakarpattia, Olena Mudra, reported a media smear campaign against her', 09.06.2025 (in Ukrainian), <https://imi.org.ua/news/zhurnalistka-iz-zakarpattya-olena-mudra-zayavyla-pro-dyskredytatsijnu-kampaniyu-v-media-shhodo-neyi-i68736>.

¹⁵³ Ihor Rozkladay, Chief Expert in Media Law and Social Media Content Moderation at CEDEM, during an interview on 05 September 2025.

¹⁵⁴ ZMINA Human Rights Centre, 'The company filed a lawsuit for the protection of honour and dignity against activist Mykhailo Berchuk, who campaigns against pollution of the Dnipro River, seeking UAH 5 million in compensation', 25.07.2025 (in Ukrainian), <https://zmina.info/news/pidpryemstvo-podalo-pozov-pro-zahyst-chesti-j-gidnosti-do-aktyvista-myhajla-berchuka-yakyj-boretsya-proty-zabrudnennya-dnipra-i-vymagaye-5-mln-gryven-kompensacziyi/>.

¹⁵⁵ Draft Law on Amendments to the Civil Code of Ukraine in connection with the update (recodification) of the provisions of Book Two, No. 14057, 21.09.2025 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/57355>.

¹⁵⁶ BIHUS. Info Facebook page, a post on Draft Law No. 14057, 23.09.2025 (in Ukrainian), https://www.facebook.com/story.php?story_fbid=788994103776422&id=100079975181813&rdid=Cx8cYchWqLb31QCr.

¹⁵⁷ According to the Law of Ukraine 'On Public Media of Ukraine', funding for the National Public Broadcasting Company of Ukraine (NSTU) must be at least 0.2% of the overall expenditure of the general fund of the State Budget of Ukraine for the previous year (Part 3, Article 14). According to the Law of Ukraine 'On the State Budget of Ukraine for 2024' (as amended on 18 September 2024), expenditures of the general fund of the State Budget of Ukraine amounted to UAH 3,546,982,419.1 thousand (para. 3, Article 1). As a result, funding for the public broadcaster in 2025 was expected to exceed UAH 7 billion.

operations but not to engage in development. In contrast, about UAH 840 million¹⁵⁸ (approx. 17,3 million EUR) is allocated to support the “United Telethon,” whose effectiveness and public trust has steadily decreased due to a lack of political balance, avoidance of criticism, and perceived dependence on the authorities. This imbalance reinforces the sense of a lack of pluralism and objectivity, highlighting the need to review Ukraine’s information policy. Experts emphasise¹⁵⁹ that the current funding model, focused mainly on maintaining individual media projects, should be changed to a systematic model for supporting media in wartime and reconstruction conditions, similar to the model previously implemented by the Ukrainian Cultural Foundation (UKF), and should benefit from transparent thematic resource allocation.

The Law on Media provides a clear mechanism of proper accountability for media. However, a registry of media entities and an “electronic cabinet” to facilitate registration for these entities have not yet been developed. Additionally, the reform of municipal media, which must be re-registered as public media, has still not been implemented, as this obligation was postponed during martial law.¹⁶⁰

From 1 January 2025 to 31 August 2025, 159 cases of persecution or loss of civil society actors were recorded. Of these, 126 cases were related to Russian aggression: 46 service members (41 men and 5 women) who were journalists, civic activists, or volunteers in civilian life were killed, as were 80 civilians. The civilian killings were caused by: (i) Russian shelling or the handling of unexploded Russian munitions (18 cases); (ii) injuries (9 cases); and (iii) destruction or damage of property (53 cases).¹⁶¹ Since 2014, 118 journalists have been killed as a result of Russian armed

¹⁵⁸ According to the "Prozorro" website, the total amount of funds allocated to private media companies participating in the telethon was almost 738 million UAH: Contract No. 96/1303/25 for the provision of services funded by the state budget, dated 13.03.2025, concluded between LLC "Television and Radio Company "Studio 1+1" and State Enterprise "Multimedia Platform of International Broadcasting of Ukraine": para. 2.1, point 2, <https://prozorro.gov.ua/tender/UA-2025-03-13-013917-a>; Contract No. 97/1303/25 for the provision of services funded by the state budget, dated 13.03.2025, concluded between LLC "We – Ukraine" and State Enterprise "Multimedia Platform of International Broadcasting of Ukraine": para. 2.1, point 2, <https://prozorro.gov.ua/tender/UA-2025-03-13-013808-a>; Contract No. 98/1303/25 for the provision of services funded by the state budget, dated 13.03.2025, concluded between LLC "SLM News" and State Enterprise "Multimedia Platform of International Broadcasting of Ukraine": para. 2.1, point 2, <https://prozorro.gov.ua/tender/UA-2025-03-13-012609-a>; Contract No. 99/1303/25 for the provision of services funded by the state budget, dated 13.03.2025, concluded between JSC "TV Channel "Inter" and State Enterprise "Multimedia Platform of International Broadcasting of Ukraine": para. 2.1, point 2, <https://prozorro.gov.ua/tender/UA-2025-03-13-014038-a>. Additionally, the parliamentary TV channel "Rada" signed a contract with LLC "Kinokit" for the provision of audiovisual works (television programs) to ensure the "Unified Telethon" with a total amount of 101,520,000.00 UAH: Contract No. 2/P for the provision of services dated 01.01.2025, concluded between State Enterprise "Parliamentary TV Channel "Rada" and LLC "Kinokit": para. 2.1, point 2, <https://prozorro.gov.ua/tender/UA-2025-01-14-015074-a>.

¹⁵⁹ Ihor Rozkladay, Chief Expert in Media Law and Social Media Content Moderation at CEDEM, during an interview on 05 September 2025.

¹⁶⁰ 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/>.

¹⁶¹ Documented by the Human Rights Center ZMINA. The information provided was based on the results of consultations.

aggression.¹⁶² As of 24 August 2025, at least 26 civilian Ukrainian media workers and one journalist who joined the Defence Forces are held in Russian captivity.¹⁶³

During the summer of 2025, the following persons were returned to Ukraine through exchanges with the Russian Federation: Vladyslav Yesypenko (Radio Liberty journalist sentenced by Russia in 2022 to six years in a general-regime colony¹⁶⁴), Dmytro Khilyuk (UNIAN journalist abducted in the Kyiv region in 2022¹⁶⁵), and Mark Kaliush (administrator of the Telegram channel “Melitopol is Ukraine,” captured in 2023¹⁶⁶).

No escalation of hate speech based on ethnic or territorial origin, gender identity, social status, or age was recorded during the reporting period.

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. However, guarantees that information sources do not need to be disclosed, enshrined in the Criminal Procedure Code and the Law “On Information,” are often undermined in practice — phishing attacks against journalists demonstrate the lack of effective protection mechanisms. This places the responsibility on media organisations to ensure their own cybersecurity, and on law enforcement agencies to properly investigate such incidents.

The Civil Code defines clear and proportionate sanctions for defamation (including libel and slander) and it is not criminalised. However, there are no practical mechanisms to adequately respond to defamation or libel on social media and platforms where defamatory messages can reach thousands of times more people than subsequent retractions. In this context, concerns arise regarding cases of bullying and online attacks directly related to the professional activities of a journalist, presenter, editor, producer, or other media worker, including freelancers (for

¹⁶² Documented by the Human Rights Center ZMINA. The information provided was based on the results of consultations.

¹⁶³ Institute of Mass Information, ‘Ukrainian journalists in Russian captivity: current list’, 11.10.2024 (in Ukrainian), https://imi.org.ua/monitorings/ukrayinski-zhurnalisty-u-poloni-rosiyi-aktualnyj-spysok-i64223?fbclid=IwY2xjawMRX2ZleHRuA2FibQIxMABicmlkETFsdxU4VFVmUWVEYk5TbDgyAR5Xvld2qoLy9xt-aAHjID4XHdxuynlBBsvSG0AKUE3jn_QLheJuj9W1bedO7w_aem_rByz-r0WOaNRSOHMoJ64YQ.

¹⁶⁴ ZMINA Human Rights Centre, ‘My Small Victory: Journalist Vladyslav Yesypenko on four years of imprisonment and the importance of supporting political prisoners’, 20.08.2025 (in Ukrainian), <https://zmina.info/articles/moya-malenka-peremoga-zhurnalist-vladyslav-yesypenko-pro-4-roky-uvyaznennya-ta-vazhlyvist-pidtrymky-politvyazniv/>.

¹⁶⁵ Institute of Mass Information, ‘Dmytro Khilyuk has returned from Russian captivity’, 24.08.2025 (in Ukrainian), <https://imi.org.ua/news/z-rosijskogo-polonu-povernuvsy-dmytro-hylyuk-i68726>.

¹⁶⁶ Institute of Mass Information, ‘Freed from captivity, media worker Mark Kaliush spoke about the torture he endured in Russian detention’, 27.08.2025 (in Ukrainian), <https://imi.org.ua/news/zvilneny-z-polonu-mediynyk-mark-kaliush-rozpoviv-pro-tortury-v-rosiyskomu-poloni>.

example, cases monitored by the NGO “Women in Media”¹⁶⁷), of which at least 53 were recorded in 2025.

The Law on Media defines clear grounds and procedures for refusing to register media entities and for the cancellation of registration of media entities. At the same time, experts note¹⁶⁸ that this is a sectoral law aimed primarily at regulating relations between the regulator and media and establishing basic journalistic standards. A key challenge remains the lack of effective self-regulatory mechanisms in the media sector, which are necessary to complement and balance the state’s regulatory role.

No data exist on unlawful or disproportionate blocking of conventional or online media. Publishing online does not require a special permit or adherence to the specific administrative rules that are applied to traditional media. However, it should be noted that actual blocking of posts on social networks depends, not on national regulators, but on the platforms themselves, most of which are registered under U.S. jurisdiction. In Ukraine, there are no effective tools to engage with such companies.

A separate threat is posed by draft law No. 12320,¹⁶⁹ passed at second reading on 16 July 2025, which introduces administrative liability for publicly associating a lawyer with a client they represent, extending measures to media, journalists, civil society organisations, and professional associations. The proposed provisions are formulated very broadly and unclearly, which does not comply with the principle of legal certainty and creates significant risks to freedom of expression. If this law comes into force, any journalistic material or social media publication concerning high-profile legal cases may lead to liability. Civil society and media have called on the President to veto the adopted law.¹⁷⁰

The risk identified in the previous period associated with draft law No. 7033-d,¹⁷¹ which limits access to certain categories of court decisions and could negatively affect freedom of expression for civil society representatives and researchers, has not been eliminated; the draft law is

¹⁶⁷ NGO “Women in Media”. Online Attack Map (in Ukrainian), <https://wim.org.ua/attack-map/>.

¹⁶⁸ Ihor Rozkladay, Chief Expert in Media Law and Social Media Content Moderation at CEDEM, during an interview on 05 September 2025.

¹⁶⁹ Draft Law on Amendments to the Code of Ukraine on Administrative Offenses, the Criminal Code, and the Criminal Procedure Code of Ukraine to Ensure Compliance with Guarantees of Advocacy Activities, No. 12320, 16.12.2024 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/45435>.

¹⁷⁰ CEDEM, Statement of Civil Society Organisations on the Adopted Draft Law No. 12320 on Ensuring Compliance with Guarantees of Advocacy Activities, 21.07.2025 (in Ukrainian), <https://cedem.org.ua/news/zakonoprojekt-12320/>.

¹⁷¹ Draft Law on Amendments to Certain Laws of Ukraine on Preventing the Disclosure of Specific Information in Court Decisions, No. 7033-d, 03.01.2023 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/41159>.

currently being prepared for second reading, and a comparative table was provided on 21 March 2025.

There are no reported cases of journalists being convicted for failure to reveal their information sources or media entities being searched to reveal them. There have been no public statements on the progress of investigations into high-profile cases from the previous period (for example, attempts to intimidate Yurii Nikolov¹⁷² or covert surveillance of the Bihus.Info investigative team¹⁷³). However, cases of targeted attacks on journalists (for example, the detention of Hromadske journalist, Maksym Kotsiubynskyi, after documenting that Minister of Justice Olha Stefanishyna¹⁷⁴ was using an undeclared apartment) demonstrate that the problem remains unresolved.

State authorities attempt to promote the dissemination of reliable information. However, their communication is often untimely, superficial, or overly cautious. Insufficient attention to crisis communication and the absence of modern practices for conducting public discussions create a vacuum that can be filled with disinformation and manipulation. A traumatised society remains vulnerable to such disinformation, and the absence of a consistent state policy on freedom of expression only increases these risks.

Recommendations:

- Law enforcement, including the Prosecutor General's Office, should continue investigating and documenting Russian crimes against CSO representatives and the media, with a view to holding Russia accountable;
- The law enforcement agencies should ensure the immediate investigation of cases of persecution of CSO and media representatives, including anti-corruption activists, and take preventive measures against such cases;
- Local (military) state administrations and local self-government bodies should provide journalists with access to their proceedings, ensure the broadcast of sessions and publish information in a timely manner;

¹⁷² Detector Media, 'Unknown individuals staged a provocation against investigative journalist Yurii Nikolov – they broke into his apartment demanding that he "go serve"', 15.01.2024 (in Ukrainian), <https://detector.media/infospace/article/221722/2024-01-15-nevidomi-vlashtuvaly-provokatsiyu-proty-zhurnalista-rozsliduvacha-yuriya-nikolova-lomylys-do-kvartyry-vymagayuchy-yty-sluzhyty/>.

¹⁷³ Detector Media, 'The Verkhovna Rada summons the head of the Security Service of Ukraine (SBU) for explanations regarding surveillance of Bihus.Info', 06.02.2024 (in Ukrainian), <https://detector.media/infospace/article/222597/2024-02-06-verkhovna-rada-vyklykaie-golovu-sbu-dlya-poyasnen-shchodo-stezhennya-za-bihusinfo/>.

¹⁷⁴ Institute of Mass Information, 'In Kyiv, the police detained a journalist from hromadske for several hours', 03.07.2025 (in Ukrainian), <https://imi.org.ua/news/u-kyievi-politsiya-protyagom-kilkoh-godyn-utrymuvala-zhurnalista-hromadske-i69165>.

- 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, as well as Draft Law No. 14057; it should also avoid the practice of registering or considering draft laws that pose threats to freedom of expression;
- The President of Ukraine should **sign Draft Law No. 11321**, aimed at strengthening guarantees for the activities of media, journalists, and citizens' access to information, including the transparency of Parliamentary Committees; and
- The President of Ukraine should veto Draft Law No. 12320, as it poses a threat to freedom of speech, and sign Draft Law No. 11321.

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 normative legal acts. In 2025, despite the existing legal framework, experts noted limited progress in the field of personal data protection, and certain practices indicate a deterioration of the situation, particularly due to the state's broad data collection capabilities. Legislative initiatives submitted in previous periods largely remain unconsidered. Draft Law No. 11031, which drew criticism due to privacy risks, was withdrawn from consideration. In April 2025, Draft Law No. 13181 was registered, aimed at strengthening the institutional capacity of the Ombudsman in the field of personal data protection. Mechanisms for investigating violations in this area remain ineffective. Despite the state-guaranteed right to privacy for CSOs, such protection is complicated or restricted due to the actions of the Russian Federation, particularly in temporarily occupied territories.

The overall score in the field of "Right to Privacy," as well as the assessments of legislation and practice, did not change compared to the previous reporting period. In 2026, it is recommended to adopt a new Law of Ukraine "On Personal Data Protection," strengthen independent institutional mechanisms (including the Ombudsman), and introduce effective safeguards against abuses in the field of access to personal information.

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,¹⁷⁵ the Criminal Procedure Code,¹⁷⁶ and the Civil Code,¹⁷⁷ as well as, among others, the Law on Counterintelligence Activities¹⁷⁸ and the Law on Personal Data Protection.¹⁷⁹ The latter regulates legal relations related to the collection, protection, and processing of personal data by the state authorities. Despite the

¹⁷⁵ Criminal Code of Ukraine, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

¹⁷⁶ Criminal Procedure Code, No. 4651-VI, 13.04.2012 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4651-17#Text>.

¹⁷⁷ Civil Code of Ukraine, No. 435-IV, 16.01.2003 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/435-15#Text>.

¹⁷⁸ Law of Ukraine on Counterintelligence Activities, No. 374-IV, 26.12.2002 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/374-15>.

¹⁷⁹ Law of Ukraine on Personal Data Protection, No. 2297-VI, 01.06.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2297-17>.

existence of a legal framework, experts note¹⁸⁰ that progress in the field of personal data protection in 2025 is limited, and certain practices even indicate a deterioration of the situation, particularly due to the state's broad data collection capabilities.

The Draft Law on Personal Data Protection,¹⁸¹ which was adopted by the Parliament of Ukraine at first reading, has not progressed further. The Draft Law on the National Commission on Personal Data Protection and Access to Public Information¹⁸² has also not been considered. These Draft Laws were designed to create a basis for the protection of personal data in both the public and private sectors (by extending the rights of the subject of personal data), bringing the provisions of Ukrainian legislation in line with international standards, in particular Convention 108¹⁸³ 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. According to experts, in 2025, the practice of granting access to law enforcement agencies to personal data under simplified procedures persists, as do cases involving the Territorial Center for Recruitment and Social Support accessing personal data without a court order. Such practices include, in particular, phone checks, superficial inspections, and even imposing restrictions on personal freedom. The use of video surveillance systems and covert investigative tools is becoming increasingly widespread, not only in cases of serious crimes but also in proceedings of moderate severity.

Draft Law No. 11228¹⁸⁴ and Draft Law No. 11228-1¹⁸⁵, which grant counterintelligence agencies additional powers (for example, to create and access information systems and databases, including video surveillance systems) were not considered during the reporting period. Draft Law No. 11031¹⁸⁶ was withdrawn from consideration. This draft law had been assessed as

¹⁸⁰ Maksym Shcherbatyuk, Program Director of the Ukrainian Helsinki Human Rights Union, during an interview on 12 September 2025.

¹⁸¹ Draft Law on Personal Data Protection, No. 8153, 25.10. 2022 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/40707>.

¹⁸² 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>.

¹⁸³ 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>.

¹⁸⁴ 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>.

¹⁸⁵ 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>.

¹⁸⁶ Draft Law on a Unified Video Monitoring System for Public Safety, No. 11031, 20.02.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43733>.

violating fundamental rights to privacy of data subjects due to risks related to the broad powers of state and municipal authorities, insufficient data protection, and technical issues with video surveillance systems.

Despite the fact that the Criminal Code and the Civil Code provide for the investigation and prosecution of violations of the right to privacy, experts¹⁸⁷ consider that this mechanism remains ineffective. Experts note that it requires review and that the work of relevant institutions in this area, including the Office of the Commissioner of the Parliament of Ukraine on Human Rights, needs to be strengthened. On 17 April 2025, Draft Law No. 13181¹⁸⁸ was registered in Parliament, aimed at strengthening the institutional capacity of the Ombudsman, in particular by expanding the Ombudsman's legal powers in the field of personal data protection through the grant of full access to restricted access information and state secrets of all levels.¹⁸⁹ The draft law is being prepared for consideration at first reading.

According to experts, the scale of challenges (including the use of artificial intelligence and the absence of adequate security safeguards in the digital space during investigations) significantly exceeds the available capacity of the state to respond. CSOs are therefore often unable to access effective legal recourse when their rights are violated. This is important as 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 under the Tax Code and, among others, Orders of the Ministry of Finance¹⁹⁰ do not violate the privacy of CSOs' members, donors, board members or employees, or the confidentiality of their personal assets. During the 2025 reporting period, there were no attempts to introduce additional reporting measures by the authorities, including in relation 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

¹⁸⁷ Civil society experts with expertise in relevant CSO Meter areas; data collected through interviews, consultations and focus groups.

¹⁸⁸ Draft Law on the Commissioner of the Verkhovna Rada of Ukraine for Human Rights, No. 13181, 17.04.2025 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/56212>.

¹⁸⁹ IMS, Digital Security Lab Ukraine. Media and Digital Rights Regulation in Ukraine, Digest #22, April 2025, <https://dslua.org/wp-content/uploads/2025/05/Digest-22-April-2025.pdf>

¹⁹⁰ Order of Ministry of Finance of Ukraine 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>.

Investigative Activities.¹⁹¹ 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). In practice, in 2025, a high-profile case was documented involving access to the personal data of the family of anti-corruption activist Vitaliy Shabunin.¹⁹² At the same time, the Security Service of Ukraine continues its investigation (within the framework of a criminal proceeding) into the illegal surveillance of journalists from the Bihus.Info project.¹⁹³ According to experts, cases such as these have become more common and indicate an increase in attempts by law enforcement agencies to exert influence over the civil society sector. At the local level, the situation is even more challenging: regional activists may face systemic pressure from law enforcement focused on mobilisation, family members, work, or finances.

In 2025, reports indicated the creation of fake Telegram bots by fraudsters, visually mimicking the official pages of organisations, including charitable platforms. Their goal is to steal users' personal data and withdraw money from bank cards.¹⁹⁴

In the temporarily occupied territories, the Russian Federation has intensified pressure on local residents in relation to the right to privacy.¹⁹⁵ Additional challenges remain with respect to the security of electronic public registries (for example, there was an attack on 19 December 2024 by the Russian hacker group XakNet Team on the registries of the Ministry of Justice of Ukraine¹⁹⁶) and with respect to access to provider data. According to experts,¹⁹⁷ although Ukraine has adopted a new action plan for implementing the Cybersecurity Strategy,¹⁹⁸ its

¹⁹¹ 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>.

¹⁹² Vitalii Shabunin Facebook page, 'The investigation leaked data from my wife's confiscated phone to pro-OP Telegram dump channels (and then it was further spread in channels with millions of subscribers)', 25.08.2025 (in Ukrainian), https://www.facebook.com/permalink.php?story_fbid=pfbid02XHPZn7SACGW2kiRA2MbEdCS18WpAFUBcTv7gCedkdPtBU6i4ehn8iPgF39tUblvrl&id=678864536.

¹⁹³ UN Office of the High Commissioner for Human Rights, Report on the Human Rights Situation in Ukraine, 01.12.2024 - 31.05.2025, <https://reliefweb.int/report/ukraine/report-human-rights-situation-ukraine-1-december-2024-31-may-2025>.

¹⁹⁴ Institute of Mass Information, 'Cyber Police: Scammers Create Fake Telegram Bots Masquerading as Banks', 26.06.2025 (in Ukrainian), <https://imi.org.ua/news/kiberpolitsiya-shahrayi-stvoryuyut-falshyvi-telegram-boty-pid-vglyadom-bankiv-i69056>.

¹⁹⁵ Resolution of the CMU on Approval of the 2025 Action Plan for the Implementation of the Cybersecurity Strategy of Ukraine, No. 204-r, 07.03.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/204-2025-%D1%80#Text>

¹⁹⁶ Deutsche Welle, 'The Ministry of Justice state registries have been restored, and the investigation is ongoing', 20.01.2025 (in Ukrainian), <https://www.dw.com/uk/derzreestri-minustu-vidnovili-rozsliduvanna-trivae/a-71333587>.

¹⁹⁷ Maksym Shcherbatyuk, Program Director of the Ukrainian Helsinki Human Rights Union, during an interview on 12 September 2025.

¹⁹⁸ Resolution of the CMU on Approval of the 2025 Action Plan for the Implementation of the Cybersecurity Strategy of Ukraine, No. 204-r, 07.03.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/204-2025-%D1%80#Text>.

implementation remains largely for individual projects, which does not correspond to the scale of the threats.

Recommendations:

- The Parliament of Ukraine should adopt the new Law on Personal Data Protection and the draft law “**On the National Commission for the Protection of Personal Data and Access to Public Information**” 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;
- The Parliament of Ukraine should withdraw from consideration Draft Law No. 11031, aimed at introducing a unified system of video monitoring of public security, 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 electronic public 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** /7

Practice: **3.4** /7

Ukraine has a legally guaranteed duty to protect CSOs from harm by third parties. In 2025, the main threat to activists, CSOs, and public figures continued to be the Russian Federation, which systematically persecutes, tortures, and unlawfully convicts Ukrainian human rights defenders, journalists, volunteers, and representatives of the Crimean Tatar people in the temporarily occupied territories.

Security in the territory of Ukraine was also incompletely protected by the state due to Russia's armed aggression; however, the state does not use extraordinary measures under martial law as a pretext to restrict participation, human rights, or the activities of CSOs. In the area of financial monitoring and anti-corruption policy, the key challenges have not changed: the requirement to identify the ultimate beneficial owner of CSOs continues to raise concerns.

The overall score in this area, as well as the scores for Legislation and Practice, remain unchanged as compared to 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 against the 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. CSOs also point to cases of persecution of anti-corruption activists and investigative journalists in Ukraine (see also section 3.6). However, emergency measures in place due to the war are not used by the state as a pretext to limit CSOs' participation in civil society, breach human rights or to sanction critical organisations.

Experts note¹⁹⁹ that 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. Fabricated criminal cases on charges of "terrorism," "espionage", and "treason" have become instruments of political

¹⁹⁹ Olga Skrypyuk, Head of the Board of the Crimean Human Rights Group, during consultations in September 2025.

control. Whereas previously the FSB “filtered” veterans and activists, now merely demonstrating Ukrainian identity or dissent with the occupation is sufficient grounds for persecution.²⁰⁰ Moreover, the Russian Federation has adopted a new budget to expand the number of pre-trial detention centres, including in the Autonomous Republic of Crimea, which may indicate plans to scale up persecution and unlawful investigative practices.²⁰¹ 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, in just the first six months of 2025, 64 people were detained in the Autonomous Republic of Crimea, 13 of whom were representatives of the Crimean Tatar people.²⁰² In September 2025, an occupation “court” imposed a fine of 30,000 rubles (approx. 327,8 EUR) on Crimean Tatar journalist and human rights defender, Lutfie Zudiyeva, for allegedly engaging in “foreign agent” activities without filing an application. In court, Ms. Zudiyeva stressed that there was no evidence of “foreign influence” and that the occupiers had unjustifiably stigmatised and misrepresented her civic and journalistic work”.²⁰³

Additional hardship is being exerted on those already illegally convicted by Russia. For instance, Crimean Tatar political prisoner, Server Zekiryaiev, unlawfully sentenced to 13 years of imprisonment, has been held for nearly three years almost continuously in the high-security facilities of Penal Colony No. 1 in the town of Donskoy, in the Tula region. According to his wife, M. Zekiryaiev is kept in inhumane conditions, where he is constantly transferred from the only cell-type facility to a punishment isolation cell, then back to a cell-type facility, and so on in a continuous cycle.²⁰⁴ Documenting the treatment of civilians detained by the Russian Federation is a particularly difficult task, as the Office of the United Nations High Commissioner for Human Rights notes that even they have access to such individuals only after their release and

²⁰⁰ ZMINA Human Rights Centre, ‘Leading role in the FSB: how Russia is changing the practice of arbitrary detention in the occupation and trying to “legitimize” its war crimes, 29.08.2025 (in Ukrainian), <https://zmina.info/articles/fsb-vidigraye-providnu-rol-u-vykradennyah-ukrayincziv-yak-zminylasya-praktyka-svavilnyh-zatryman-ta-nasylnyckyyh-znyknen-v-okupacziyi/>

²⁰¹ Crimean Human Rights Group, ‘Russia is increasing the number of penitentiary facilities: a new pre-trial detention center (SIZO) will be built in occupied Crimea’, 08.09.2025 (in Ukrainian), <https://crimeahrg.org/uk/rosiya-zbilshu%d1%94-kilkist-penitencziarnih-zakladiv-v-okupovanomu-krimu-pobuduyut-novij-sizo/>

²⁰² Suspilne Crimea, ‘In the first half of 2025, 99 people were detained in the occupied Crimea - Crisis Group’, 10.07.2025 (in Ukrainian), <https://suspilne.media/crimea/1053707-za-perse-pivricca-2025-roku-v-okupovanomu-krimu-zatrimali-99-ludej-krc/>

²⁰³ Crimean Platform, ‘Situation in Occupied Crimea’, 23.09.2025 (in Ukrainian), <https://crimea-platform.org/news/sytuatsiya-v-okupovanomu-krymu-23-veresnya-2025-roku/>

²⁰⁴ Crimean Platform, ‘Weekly Update on the Situation in Occupied Crimea’, 16.09.2025 (in Ukrainian), <https://crimea-platform.org/en/news/sytuatsiya-v-okupovanomu-krymu-16-veresnya-2025-roku/>

relocation to safe places. The Russian Federation has not granted access for purposes of independent monitoring in the occupied territory, despite numerous requests.²⁰⁵

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 Destruction²⁰⁶ does not contain provisions that restrict or make impossible the legitimate exercise or enjoyment of fundamental freedoms. Nonetheless, the requirement for CSOs to provide information about their UBO remains challenging and has not progressed in practice during 2025: experts note²⁰⁷ the need for training and further discussions to facilitate understanding of the practical implications of such requirements. CSOs continue to operate under conditions where the obligation to identify a beneficial owner appears disproportionate and ill-suited to their nature of work. In particular, many CSOs do not have a traditional ownership structure, and their governance is based on collective decision-making or voluntary participation, making the application of UBO regulations legally and practically challenging. These factors reinforce the need for tailored compliance mechanisms that reflect the specific characteristics of CSOs.²⁰⁸

Overall, the problem lies not so much in defining or monitoring ultimate beneficial owners (UBOs), but in the logic of the approach itself: the requirement is not directly related to the risks of money laundering or terrorism financing, which are the core focus areas of financial monitoring. Applying mechanisms designed to prevent money laundering to CSOs appears formalistic and disproportionate to the nature of their activities and extends anti-money laundering practices to a sector where they have neither practical nor legal relevance.

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 obliged to determine and disclose their UBO.

²⁰⁵ UN Human Rights Office of the High Commissioner, 'Treatment of Civilians Deprived of Their Liberty in the Context of the Armed Attack by the Russian Federation Against Ukraine', 23.09.2025, https://ukraine.ohchr.org/sites/default/files/2025-09/2025-09-22%20Treatment%20of%20civilians_ENG_0.pdf

²⁰⁶ 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>.

²⁰⁷ According to civil society experts with experience in the relevant fields. CSO Meter; data collected through interviews, consultations, and focus groups.

²⁰⁸ CSO Meter, 'Ukraine: New regulations on ultimate beneficial owners raise concerns for CSO legal environment', 06.01.2025, <https://csometer.info/updates/ukraine-new-regulations-ultimate-beneficial-owners-raise-concerns-cso-legal-environment>.

The State Financial Monitoring Service of Ukraine (SFMS) states that the specific nature of CSOs' activities and volunteer engagement makes them attractive to terrorist organisations and vulnerable to criminal misuse.²⁰⁹ However, the SFMS relies, for this assertion, on vague indicators — such as activities near areas of military operations or links to politically exposed persons (PEPs). Despite the lack of detailed evidence or support, the SFMS's view, together with the 2025 National Risk Assessment, will influence future financial monitoring practices regarding CSOs.²¹⁰

According to the findings of a study conducted by CEDEM,²¹¹ the involvement of volunteers in CSO activities does not significantly affect their AML/CFT risk profile. CSOs rarely encounter cases of volunteer-related fraud, as they implement internal safeguards that protect them from such risks — including background checks, contractual arrangements, and engagement of only verified individuals, among other measures.

Nonetheless, in 2025, as in the previous period, there have been instances in which CSOs have received requests for additional documentation to confirm their 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,²¹² the State Anti-Corruption Policy for 2021-2025,²¹³ and the State Anti-Corruption Programme for 2023-2025²¹⁴ do not directly relate to the activities of CSOs, as these organisations do not exercise public authority. The adoption of Law No. 4554 (draft No. 12414)²¹⁵ in July 2025 potentially undermined the independence of oversight institutions and signalled a possible discouragement of civic engagement in the future,

²⁰⁹ CEDEM. National Risk Assessment 2025: Report on the results of a survey of civil society organisations engaging volunteers, 22.09.2025, <https://cedem.org.ua/en/news/national-risk-assessment-2025/>.

²¹⁰ CSO Meter, 'Ukraine: State AML/CFT risk assessment of civil society raises concerns', 03.01.2025, <https://csometer.info/updates/ukraine-state-amlcft-risk-assessment-civil-society-raises-concerns>.

²¹¹ CEDEM. National Risk Assessment 2025: Report on the results of a survey of civil society organisations engaging volunteers, 10.09.2025 (in Ukrainian), <https://cedem.org.ua/news/nor-2025-opytuvannia/>.

²¹² 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>.

²¹³ 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>.

²¹⁴ 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>.

²¹⁵ Law of Ukraine on Amendments to the Criminal Procedure Code of Ukraine Regarding the Peculiarities of Pre-Trial Investigation of Criminal Offenses Related to the Disappearance of Persons Under Special Circumstances During Martial Law. No. 4555-IX, 22.07.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4555-%D0%86%D0%A5#Text>.

particularly in anti-corruption and good governance campaigns.²¹⁶ However, nationwide protest actions (see also Section 6) helped preserve the independence of these institutions.

The provisions of the Law on the Prevention of Corruption establish that declarants include representatives of CSOs who are members of competitive and disciplinary commissions formed under the Law on State Service,²¹⁷ the Law on Service in Local Self-Government Bodies,²¹⁸ 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.²¹⁹ 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 commissions. Initiatives to introduce declaration requirements for CSO representatives, for example those involved in anti-corruption activities, are absent.

In January 2025, Ukraine’s Law No. 4156-IX (Draft Law No. 12102)²²⁰ entered into force, introducing a mechanism for the formation and maintenance of a list of terrorist organisations, administered by the Security Service of Ukraine (SSU). The law was adopted to strengthen the national security framework and fulfil Ukraine’s international obligations, in particular under the Council of Europe Convention on the Prevention of Terrorism. At the same time, some civil society experts have expressed concerns about potential risks to freedom of association due to the vagueness of certain provisions, the procedure for including organisations in the list, and the absence of an independent judicial review mechanism. In their view, these factors may create opportunities for abuse or politically motivated decisions.²²¹

However, under Ukraine’s existing legislation, the concept of a “terrorist organisation” is already defined in the Law “On Combating Terrorism” as a stable association of three or more persons established to carry out terrorist activities. The inclusion of organisations (groups) in the list is carried out exclusively on the basis of legal procedures and court decisions, taking into account threats to Ukraine’s national security. Therefore, given the complexity of law

²¹⁶ CSO Meter, ‘Ukraine: With public pressure mounting, President promises to change controversial law undermining anti-corruption institutions’, 29.07.2025, <https://csometer.info/updates/ukraine-public-pressure-mounting-president-promises-change-controversial-law-undermining>.

²¹⁷ Law of Ukraine on State Service, No. 889-VIII, 10.12. 2015 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/889-19#Text>.

²¹⁸ Law of Ukraine on Service in Local Self-Government Bodies, No. 2493-III, 07.06.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2493-14#Text>.

²¹⁹ Law of Ukraine on the Judicial System and the Status of Judges, No. 1402-VIII, 02.06.2016 (in Ukrainian), <https://zakon.rada.gov.ua/laws/card/1402-19>.

²²⁰ Law of Ukraine on Amendments to Certain Laws of Ukraine Regarding the Formation and Maintenance of the List of Terrorist Organisations (Groups), No. 4156-IX, 18.12.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4156-20/card4>

²²¹ CSO Meter, ‘Ukraine: New anti-terrorism law could stifle grassroots activism’, 12.05.2025, <https://csometer.info/updates/ukraine-new-anti-terrorism-law-could-stifle-grassroot-activism>.

enforcement and the diversity of assessments, it is currently too early to evaluate the impact of this law on the activities of CSOs.

Recommendations:

- The government should abolish the requirement for CSOs to provide information on their UBOs, as CSOs do not generally have traditional ownership structures with percentage-based controlling interests;
- Law enforcement and judicial authorities should facilitate the protection of CSOs and activists in cases where there has been a violation 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** /7

The practice of using state support mechanisms continues, even under conditions of limited resources and reduced external funding. During the reporting period, the state implemented support through open competitions. Preconditions were established to strengthen support for youth and children's organisations through the activities of the Ukrainian Youth Fund. Efforts to promote volunteering have clearly been made, including: (i) the approval of the Concept of the State Target Program for the Development of Volunteer Activity; (ii) the adoption of Law №4186-IX, which ensures recognition of competencies acquired through volunteer work; and (iii) the registration of draft law №13071,²²² which abolishes the requirement for a long-term type D visa for foreign volunteers. At the same time, Ukraine updated its humanitarian aid framework by introducing the status of a "verified humanitarian organisation" under its tax legislation, allowing CSOs to import vehicles duty-free for evacuations, deliveries, and relief, provided that the Cabinet of Ministers establishes transparent procedures.

The overall score in this area, as well as the assessments for legislation and practice, remain unchanged as compared to 2024.

In 2026, the state should also focus on: (i) ensuring an effective mechanism to support volunteers affected by the armed aggression while providing assistance to military personnel or civilians; (ii) considering Draft Law No. 10040, which proposes amendments to the Tax Code of Ukraine to support the practice of volunteer insurance by the organisations engaging them, including during martial law; and (iii) approving the State Targeted Social Program to Support Volunteer Activities.

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 note that global funding cuts for CSOs and development have increased the level of competition within the sector for securing operational resources.

Overall, the state provides limited and insufficient amounts of funding to CSOs to support their sustainability. The state supports organisations working in various fields through different

²²² Draft Law on Amendments to the Law of Ukraine on the Legal Status of Foreigners and Stateless Persons Regarding the Abolition of Visa Requirements for Foreigners and Stateless Persons Who Are Humanitarian Workers and Volunteers During the Period of Martial Law, No. 13071, 11.03.2025 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/55940>

institutions. In 2025, the State Budget of Ukraine²²³ allocated UAH 87,524,300 (approx. 1,809,727.7 EUR) from the general fund to support CSOs focused on physical culture and sports. In 2024, support in this area amounted to UAH 76,925,500 (approx. 1,751,092 EUR). While funding has increased, the impact may be relatively modest given overall inflation and rising prices in the country.

On 13 July 2025, Law №4488-IX²²⁴ came into force, allowing the Ukrainian Youth Fund (UYF) to attract grant, charitable, and sponsorship funds to support youth initiatives. The law expands funding sources, increases transparency, and boosts institutional capacity support.

During September 2025, the UYF conducted public discussions on the creation of mechanisms for supporting youth and children's CSOs through the provision of budgetary grants as institutional support.²²⁵ The new law significantly broadens the concept of grants in youth policy, allowing funding not only from state and local budgets or international assistance, but also from voluntary contributions by individuals, businesses (including foreign businesses), and other legal sources. This widens access to funding and reduces their reliance on public budgets. According to UYF information,²²⁶ grant opportunities are already being implemented at the regional level, primarily funded by charitable foundations and voluntary contributions from individuals and businesses, while the UYF is also expanding institutional support, enabling youth CSOs to access funding for staff, offices, and administrative capacity, thereby enhancing their financial sustainability and operational reach.²²⁷

In 2025, the state facilitated the involvement of CSOs in the provision of social services at the community level through small grants. As part of the *SPIRIT* project,²²⁸ over 100 social service providers in 261 communities received public funding to deliver services such as building resilience in children and families, day care, support for inclusive education, temporary respite care for parents of children with disabilities, and more. This project became a model of cooperation between the state, local authorities, international partners, and CSOs — effectively

²²³ Law of Ukraine on the State Budget of Ukraine for 2025, No. 4059-IX, 19.11.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4059-20#Text>.

²²⁴ Law of Ukraine on Amendments to the Law of Ukraine 'On the Basic Principles of Youth Policy' Regarding the Improvement of Financial Mechanisms for the Implementation of Youth Policy, No. 4488-IX, 05.06.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4488-IX#Text>.

²²⁵ Ukrainian Youth Foundation Facebook page, 'The announcement by the Ukrainian Youth Fund (UMF) regarding the discussion of support mechanisms', 02.09.2025 (in Ukrainian), <https://www.facebook.com/uyf.gov.ua/posts/pfbid02AkUQJqUJwi8bPAW5zwwdmZ4RsTb6umr4b42zHX4UH36iX7sqViA3nEFP263TKD8QI>.

²²⁶ Ukrainian Youth Foundation. Events (in Ukrainian), <https://uyf.gov.ua/timeline/?&type=events>.

²²⁷ CSO Meter, 'Ukraine: Legal reform opens new funding channels for youth work', 27.06.2025, <https://csometer.info/updates/ukraine-legal-reform-opens-new-funding-channels-youth-work>.

²²⁸ The project "Social Protection for Inclusion, Resilience, Innovation and Transformation (SPIRIT)" is implemented by the Ministry of Social Policy of Ukraine in cooperation with the Fund for Social Protection of Persons with Disabilities and UNICEF Ukraine, administered by ISAR Ednannia with the support of the government of the United Kingdom.

integrating CSOs into the formal system of social service delivery.²²⁹ For implementation, a Commission is engaged, which includes representatives of state authorities, international organizations, and civil society.²³⁰

Competitions for financial support have been announced by the Ukrainian Cultural Foundation²³¹ and the Ukrainian Veterans Fund of the Ministry of Veterans Affairs²³². Compared to other sources of funding, state support still lacks sufficient flexibility: for example, obtaining such funding requires opening a treasury account, and the procedures for transferring funds and application formalities are more burdensome.

At the same time, Ukraine has introduced changes to the humanitarian aid framework, enabling CSOs to import vehicles for evacuations, deliveries, and relief efforts. Draft Law No. 12010²³³ (Law 4608-IX) establishes the status of a “verified humanitarian organisation,” which can import vehicles duty-free for non-commercial use. The effectiveness of these changes will depend on how promptly and transparently the Cabinet of Ministers defines the verification procedures and manages the registry to ensure that access to resources is not limited for smaller or newly-established organisations.²³⁴

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 establishes a procedure for holding a competition for programmes (projects, events) to be developed by CSOs and implemented with state financial support.²³⁵ According to the rules of the applicable tender procedures, authorities must form tender commissions (which may include representatives of CSOs), publicise the results of the

²²⁹ Ministry of Social Policy, Family and Unity of Ukraine, ‘The Small Grants Project is an example of successful synergy between the state, society, and international partners to assist individual families’, 27.03.2025 (in Ukrainian), <https://www.msp.gov.ua/press-center/news/proyekt-malykh-hrantiv-tse-pryklad-vdaloyi-synerhiyi-derzhavy-suspilstva-i-mizhnarodnykh-partneriv-dlya-dopomohy-konkretnym-rodynam-oksana-zholnovych>.

²³⁰ Fund for Social Protection of Persons with Disabilities. SMALL GRANTS for social service providers (in Ukrainian), <https://www.ispf.gov.ua/diyalnist/realizaciya-pilotnih-proektiv-shchodo-zakupivli-socposlug/mali-granti-dlya-nadavachiv-socialnih-poslug>.

²³¹ Ukrainian Cultural Foundation, Grant programmes (in Ukrainian), <https://ucf.in.ua/programs>.

²³² Ukrainian Veterans Fund of the Ministry of Veterans Affairs of Ukraine (in Ukrainian), <https://mva.gov.ua/vartogo>.

²³³ Law of Ukraine on Amendments to the Law of Ukraine on Humanitarian Aid Regarding the Regulation of Humanitarian Organisations’ Activities, No. 4608-IX, 18.09.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4608-IX#Text>.

²³⁴ CSO Meter, ‘Ukraine adopts new framework for CSOs importing vehicles for humanitarian aid’, 25.09.2025, <https://csometer.info/updates/ukraine-adopts-new-framework-csos-importing-vehicles-humanitarian-aid>.

²³⁵ 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 of Which Financial Support is Provided, No. 1049, 12.10.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/1049-2011-n#n15>.

tender and indicate the winning projects and the period of activity covered by the tender. These rules have been applied in practice in 2025.

Announcements of competitions throughout 2025 were conducted via the “E-Competitions” module on the “VzaemoDiya”²³⁶ platform. For instance, a competition was held in 2025 to select projects developed by youth and children’s CSOs eligible for financial support.²³⁷

The procedure for submitting an application for state funding is mostly clear. Information about the competition and selection conditions is made public via publication on the institution's website. Information about selection results is usually published promptly. Co-financing support with international partners is also carried out through an open competition procedure with the selection of recipients being made by members of the expert council.

In addition to state funding on a competitive basis, which implies clear rules, state funding on a non-competitive basis is also available, meaning that certain organisations receive a predetermined amount of funding each year without needing to submit applications or compete for grants. 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.) all receive such funding.

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 that is free of charge. To be registered for and obtain non-profit status, CSOs must submit an application 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 cases include the use of income (profits) for purposes other than those specified in the CSO’s constituent documents and the 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, it is possible for CSOs to apply for the tax refund mechanism through which an individual donor can assist a CSO and be compensated

²³⁶ E-Competitions Platform (in Ukrainian), <https://grants.vzaemo.dii.gov.ua/contests>.

²³⁷ Announcement of the Competition for the selection of projects developed by youth and children's civil society organizations, for which financial support will be provided in 2025, <https://grants.vzaemo.dii.gov.ua/contests/72aeffb0-bc58-11ef-8647-d1c3cb8e402e>

for a certain part of the tax paid (not exceeding 4 per cent of the amount of their total taxable income in the relevant accounting year).

Pursuant to the amendments adopted at the end of 2024 (Law No. 4143-IX²³⁸), new benefits have also been introduced for CSOs. They can provide limited financial compensation to employees of up to 5 per cent of annual income without losing their non-profit status, spend funds on humanitarian aid and recovery without restrictions, and benefit from the exemption from personal income tax for charitable donations collected publicly by individuals.²³⁹

On July 5, 2025, Law No. 4505-IX²⁴⁰ entered into force, granting a specific VAT exemption to social services across all categories of providers — including CSOs — that are registered in the official Registry of Social Service Providers and Recipients.

There are also a number of tax exemptions available to CSOs, including humanitarian aid and charitable assistance. Additionally, it is worth noting Draft Law No. 10040²⁴¹, which proposes amendments to the Tax Code to support the insurance of volunteers by the organisations that engage them. This is expected to assist CSOs, as the additional taxation of insurance policy costs (23 per cent personal income tax and military levy) falls directly on these organisations, potentially affecting their financial capacity.

There is, however, no available information published by the tax authorities on the use of tax benefits by CSOs in 2025.

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

The Law on Charitable Activities and Charitable Organisations²⁴² and the Tax Code (as amended by Law No. 2120-IX)²⁴³ provide the possibility of receiving tax benefits, including benefits from income tax for CSO benefactors. The list of expenses eligible for a tax deduction includes the amount of funds or the value of property transferred by a taxpayer as donations or

²³⁸ Law of Ukraine on Amendments to the Tax Code of Ukraine and Other Laws of Ukraine Regarding the Exemption from Value Added Tax of Operations for the Importation into the Customs Territory of Ukraine of Certain Defence-Related Goods, No. 4143-IX, 17.12.2024 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4143-IX#Text>.

²³⁹ CSO Meter, 'Ukraine: New tax rules could strengthen civil society response in wartime', 20.01.2025, <https://csometer.info/updates/ukraine-new-tax-rules-could-strengthen-civil-society-response-wartime>.

²⁴⁰ Law of Ukraine on Amendments to the Tax Code of Ukraine and Other Laws of Ukraine Regarding the Expansion of Patients' Access to Medicines Subject to Procurement by the Person Authorised to Conduct Procurement in the Healthcare Sector through the Conclusion of Managed Access Agreements, No. 4505-IX, 18.06.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4505-20#Text>.

²⁴¹ Draft Law on Amendments to the Tax Code of Ukraine to Support Volunteer Activities during Martial Law, No. 10040, 13.09.2023 (in Ukrainian), <https://itd.rada.gov.ua/billinfo/Bills/Card/42758>.

²⁴² 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>.

²⁴³ 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>.

charitable contributions to non-profit organisations up to an amount not exceeding 4 per cent of their total taxable income in the relevant reporting year.²⁴⁴

Unfortunately, obtaining such a benefit requires significant time and the submission of a wide range of documents. Businesses and individuals are generally insufficiently informed about these opportunities. Simultaneously, tax authorities treat the refund of personal income tax (PIT) withheld from salaries, because of charitable contributions, as a fiscal incentive. To improve and simplify the procedure for obtaining the tax deduction, since 2025, it has been possible to submit the necessary property and income declarations electronically, using partial automatic filing based on existing tax data.²⁴⁵

Draft Law No. 9177²⁴⁶ (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) was withdrawn from consideration in 2025. Another potentially supportive law, Draft Law No. 7500²⁴⁷ (aiming to introduce a mechanism of interest deduction to support non-profit organisations), was 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,²⁴⁸ the Law on Public Associations,²⁴⁹ the Law on Charitable Activities and Charitable Organisations,²⁵⁰ the Law on Social Services,²⁵¹ the Law on Social Work with Families, Children and Youth,²⁵² and the Law on

²⁴⁴ Tax Code, No. 2755-VI, 02.12.2010 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2755-17#top>.

²⁴⁵ Promotion of the implementation of additional mechanisms, including tax incentives, to support CSOs. Information on the status of the implementation plan for 2025–2026 of the National Strategy for the Promotion of Civil Society Development in Ukraine for 2021–2026, CMU order No. 246, 21.03.2025 (in Ukrainian), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spryiannia/info-svitlofor-20250701.pdf.

²⁴⁶ 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>.

²⁴⁷ 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>.

²⁴⁸ Law of Ukraine on Volunteer Activity, No. 3236-VI, 19.04.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3236-17#Text>.

²⁴⁹ 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>.

²⁵⁰ 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>.

²⁵¹ Law of Ukraine on Social Services, No. 2671-VIII, 17.01.2019 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2671-19#top>.

²⁵² 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>.

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 Ukraine²⁵³.

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.²⁵⁴ 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 its own challenges, such as the declaration of involved funds and the inability to purchase 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.²⁵⁵ An application for inclusion in the Register can be submitted online by an individual.²⁵⁶

In general, the legislation does not impose additional burdens and restrictions on the involvement of volunteers. Experts note²⁵⁷ that the practice of cooperation between CSOs and volunteers has improved: organisations increasingly conclude agreements with volunteers, providing guarantees and transparent conditions for collaboration.

CMU Resolution No. 604²⁵⁸ 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 national defence. According to experts,²⁵⁹ in 2025, the Ministry for Veterans' Affairs reported up to 10 payments (compared to 7²⁶⁰ in the previous period). However, the mechanism for making claims remains

²⁵³ 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>.

²⁵⁴ Law of Ukraine on Volunteer Activity, No. 3236-VI, 19.04.2011 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/3236-17#Text>.

²⁵⁵ 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 Defend, Repel 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>.

²⁵⁶ Main Department of the State Tax Service in the Dnipropetrovsk region (in Ukrainian), <https://dp.tax.gov.ua/media-ark/news-ark/768157.html>.

²⁵⁷ Natalia Povtar, lawyer in the "Civil Society" department at CEDEM, during an interview on 8 September 2025.

²⁵⁸ 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 areas of anti-terrorist operations, hostilities and armed conflict, No. 604, 19.08.2015 (in Ukrainian), <https://www.kmu.gov.ua/npas/248424084>.

²⁵⁹ Natalia Povtar, lawyer in the "Civil Society" department at CEDEM, during an interview on 8 September 2025.

²⁶⁰ Data was obtained, following a CSO request, from the Ministry of Veterans Affairs, which includes a commission responsible for making decisions on providing assistance.

complex, and payments are provided only when volunteers assist the military (not in cases of volunteering during evacuations or providing aid to civilians).

With regards to volunteer insurance, the coverage continues to be mostly provided by large and networked CSOs that have greater economic power (e.g., the Red Cross) and organisations in frontline regions. Only a few donors are willing to provide funding for volunteer insurance, usually for large-scale projects whose primary purpose is to ensure volunteering coverage. This situation is caused by additional taxation (18 per cent personal income tax and 5 per cent military levy) that arises when an organisation insures a volunteer it engages, as such insurance is considered an additional benefit for an individual under the provisions of the Tax Code of Ukraine. The state does not maintain official statistics on insurance cases or affected volunteers; data are collected only by certain networked organisations.

On 15 July 2025, the government approved until 2030 the Concept of the State Target Program for the Development of Volunteer Activities in Ukraine (CMU Resolution No. 715-r).²⁶¹ The document sets strategic goals for supporting the volunteer movement and is a requirement under the framework of the EU integration roadmap.²⁶² At the same time, despite the importance of the document, experts note²⁶³ the risk of allocating insufficient funding for the implementation of this concept, as most measures are planned to be implemented through partnerships with CSOs.

The Parliament is still considering draft Law No. 10040 (on life and health insurance for volunteers), which has seen no progress since 2023. On 11 March 2025, draft Law No. 13071²⁶⁴ was registered, abolishing the requirement for a long-term D-type visa for foreign volunteers planning to obtain temporary residence. In May 2025, the law was passed at first reading. This means that foreign volunteers can now enter Ukraine more quickly and start their activities without the bureaucratic delays previously associated with obtaining a long-term visa, which will make it easier for local CSOs to host foreign volunteers. However, experts consider the preparation of the text for the second reading to have been rushed. It was also conducted

²⁶¹ Resolution of the CMU on the Approval of the Concept of the State Target Program for the Development of Volunteer Activity in Ukraine for the Period up to 2030, No. 715-r, 15.07.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/715-2025-%D1%80#Text>.

²⁶² Office of the Deputy Prime Minister of Ukraine for European and Euro-Atlantic Integration, Roadmap for the Functioning of Democratic Institutions, (in Ukrainian), https://eu-ua.kmu.gov.ua/wp-content/uploads/UA_Dorozhnyakarta-z-pytan-funktsionuvannya-demokratychnyh-instytutstij.pdf.

²⁶³ Natalia Povtar, lawyer in the "Civil Society" department at CEDEM, during an interview on 8 September 2025.

²⁶⁴ Draft Law on Amendments to the Law of Ukraine on the Legal Status of Foreigners and Stateless Persons Regarding the Abolition of Visa Requirements for Foreigners and Stateless Persons Who Are Humanitarian Workers and Volunteers During the Period of Martial Law, No. 13071, 11.03.2025 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/55940>.

without public consultation, creating risks of implementation difficulties if it comes into force without amendment.²⁶⁵

The state is considering incentivising volunteering by increasing the recognition of its benefits by various institutions such as employers and universities. On 1 June 2025, Law No. 4186-IX came into force.²⁶⁶ Its primary goal is to ensure the recognition of competencies gained through volunteer activities in the same way as learning outcomes acquired through informal education. However, experts note²⁶⁷ that despite the active development of volunteering, its recognition as an element of non-formal education remains problematic in practice. This makes it harder to change behaviours across sectors to incorporate volunteer activities into the educational process.

Recommendations:

- To ensure a transparent and competitive procedure for the provision of state funding, the CMU and central executive authorities should involve CSO representatives in the selection of priorities for state funding in a given calendar year, as well as in the selection of members of the competition commissions for such support;
- 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;
- The tax authorities and other relevant authorities, including the National Social Service, should assist volunteers, including individual volunteers, to register in the Register of Volunteers, document their activities, and meet reporting requirements;
- The CMU should enable the insurance of volunteers who provide support in the context of countering the Russian Federation's armed aggression against Ukraine—both those assisting the military and civilians—while also ensuring the proper support and registration of insurance cases; and
- The Parliament of Ukraine should pass Draft Law No. 13071 (following its revision after public consultation), including the elimination of unjustified risks for volunteers who are foreign nationals.

3.10 State-CSO Cooperation

²⁶⁵ Natalia Povtar, lawyer in the "Civil Society" department at CEDEM, during an interview on 8 September 2025.

²⁶⁶ Law of Ukraine on Amendments to Certain Legislative Acts of Ukraine to Promote the Development of Volunteering Among Students, No. 4186-IX, 12.09.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/4186-IX#Text>.

²⁶⁷ Mykhailo Rak, Ukrainian Student Association, during an interview on 10 September 2025.

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

Legislation: **5.7** /7

Practice: **4.8** /7

In 2025, cooperation between the state and CSOs has continued and, in certain areas, deepened. The state approved a plan of measures to promote the development of civil society for the period 2025–2026, which was developed with broad public participation. However, some legislative provisions that impose unjustified restrictions on the activities of advisory bodies, given the conditions of martial law, require review. There is noted interest in the formation of new youth councils in view of legislative changes in the field.

The overall score in this area, as well as the assessments for legislation and practice, remain unchanged as compared to 2024. In 2026, public authorities should focus on implementing the provisions of new laws that provide tools to strengthen democracy, as well as on restoring the requirements for public councils that were in place prior to the introduction of martial law.

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. As part of Ukraine’s preparations for EU accession, the government adopted three strategic roadmaps under Cluster I “Fundamentals of the Accession Process,” one of which is focused on the functioning of democratic institutions and includes a set of actions aimed at strengthening the enabling environment for civil society. This process has become an example of how to develop an inclusive approach and demonstrates the gradual integration of civil society development issues into the broader context of EU integration reforms. That said, no effective mechanism has so far been proposed to monitor the implementation of this document, particularly by CSOs.²⁶⁸

The government remains dedicated to the implementation of the National Strategy for Civil Society Development in Ukraine for 2021–2026²⁶⁹ and its related Action Plan for 2025–2026²⁷⁰. The new plan was approved in March 2025. It includes 34 key tasks. Those already being implemented during 2025 include school public budgets, competitive funding for CSOs, and an

²⁶⁸ CSO Meter, ‘Ukraine: New EU Accession roadmaps include safeguards for civil society’, 27.06.2025, <https://csometer.info/updates/ukraine-new-eu-accession-roadmaps-include-safeguards-civil-society>.

²⁶⁹ Decree of the President on the National Strategy for Civil Society Development in Ukraine for 2021–2026, No. 487/2021, 27.09.2021 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/487/2021#Text>.

²⁷⁰ Resolution of the CMU on the Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026, No. 246-r, 21.03.2025 2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/246-2025-%D1%80#Text>.

online platform for citizen engagement with authorities. Preparation of the action plan was carried out in close cooperation with representatives of civil society, the academic and expert community, international organisations, and executive authorities.²⁷¹ During focus group consultations, the input of participants was noted as an example of productive dialogue and numerous proposals made by participants were incorporated into the final document.²⁷² In a similar development, consultations with the expert community have been initiated with respect to the preparation process for the Strategy for the next period.

To implement the National Strategy (in full or in part), appropriate funding is allocated and its impact on public policy is monitored. Information on the status of implementation of the National Strategy at both the central and local levels is available, in particular via a government website that publishes details on implementation,²⁷³ through consolidated reports in a traffic light format that reflects the status of various measures. However, experts note that there should be an assessment of the overall impact of the implemented elements of the Strategy, in order not only to track the level of completion, but also to understand the meaningful changes resulting from the Strategy's implementation, including at the regional and local (community) levels.

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

At the legislative level, CSOs are expected to participate in the development and implementation of state policy through public councils and other advisory bodies. This is clear, in particular, from CMU Resolution No. 996 on Ensuring Public Participation in the Formation and Implementation of State Policy.²⁷⁴

Public councils are established and operate at each of national, regional, and local levels. In 2025, provisions of CMU Resolution No. 996 remain in effect stipulating that during martial law and for a period of six months following its end, public councils must not be reorganised

²⁷¹ Government portal, Approved Action Plan for the Implementation of the National Strategy for Promoting Civil Society Development in 2025–2026, 31.03.2025 (in Ukrainian), <https://www.kmu.gov.ua/news/zatverdzhnyi-plan-zakhodiv-z-realizatsii-u-2025-2026-rokakh-natsionalnoi-stratehii-spryannia-rozvytku-hromadianskoho-suspilstva>.

²⁷² Results of the Review of Proposals Submitted by Civil Society Institutions and Their Representatives, Research Institutions, Experts, and Citizens to the Draft Resolution of the Cabinet of Ministers of Ukraine on the Approval of the Action Plan for the Implementation in 2025–2026 of the National Strategy for Promoting the Development of Civil Society in Ukraine for 2021–2026 (in Ukrainian), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spryannia/propo-to-plan-zahod-25-26.pdf.

²⁷³ CMU, Information on the status of implementation of the action plan in 2025-2026 for the realization of the National Strategy for Civil Society Development in Ukraine for 2021-2026, approved by the CMU order No. 246, 21.03.2025 (as of July 1, 2025), https://www.kmu.gov.ua/storage/app/sites/1/17-civik-2018/rubrik_spryannia/info-svitlofor-20250701.pdf.

²⁷⁴ 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>.

and information about them may not be posted on official websites.²⁷⁵ Participants in focus group discussions emphasised that in certain areas — for example, with respect to measures concerning veterans and persons with disabilities — there is a lack of specialised consultative and advisory bodies similar to the Councils on IDP Issues, of which more than 800 were functioning in Ukraine at the beginning of 2025 (the first five IDP councils were created in 2019).²⁷⁶

Another example of cooperation mechanisms between CSOs and the state are youth councils. Yet according to experts,²⁷⁷ there are a number of deficiencies with youth councils. They are often formed through non-transparent and non-public procedures (e.g. the Council on Cooperation with Student Self-Government Bodies at Higher Education Institutions under the Ministry of Education and Science of Ukraine,²⁷⁸ whose first meeting was held in April 2025). Additionally, their effectiveness can be reduced by their lack of independence and sometimes formalistic approach. Although some councils work on implementing certain projects, overall their institutional capacity raises concerns.²⁷⁹

In 2025, information on the councils remains opaque, members of different public councils have remained unchanged for long periods of time (in some cases, for more than five years) and their duties as members are not clear.

Recommendations:

²⁷⁵ Resolution of the CMU on Amendments to the Resolution of the Cabinet of Ministers of Ukraine No. 996 dated 3 November 2010, No. 909, 16.08.2022 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/909-2022-%D0%BF#Text>.

²⁷⁶ Interactive map of 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>

²⁷⁷ Mykhailo Rak, Ukrainian Student Association, during an interview on 10 September 2025

²⁷⁸ Order of the Ministry of Education and Science of Ukraine on Approval of the Regulations on the Council for Cooperation with Student Self-Government Bodies of Higher Education Institutions under the Ministry of Education and Science of Ukraine, No. 1623, 18.11.2024 (in Ukrainian), <https://mon.gov.ua/npa/pro-zatverdzhennia-polozhennia-pro-radu-z-pytan-spivpratsi-z-orhanamy-studentskoho-samovriaduvannia-zakladiv-vyshchoi-osvity-pry-ministerstvi-osvity-i-nauky-ukrainy>.

²⁷⁹ The Ministry of Education and Science, 'The Ministry of Education and Science (MES) held the first meeting of the Council for Cooperation with Student Self-Government Bodies', 11.04.2025 (in Ukrainian), <https://mon.gov.ua/news/u-mon-vidbulosia-pershe-zasidannia-rady-z-pytan-spivpratsi-z-orhanamy-studentskoho-samovriaduvannia>.

- The CMU should approve and ensure the implementation of the National Strategy for Promoting Civil Society Development in Ukraine for 2027–2032; and
- The CMU should review the provisions of normative-legal acts that, for the period of martial law and six months thereafter, prohibit the formation of new public councils, extend the powers of existing councils, and restrict or delay the publication of information about the activities of public councils on official websites.

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 martial law regime, Ukraine continues to take measures to protect these rights and create conditions for their implementation. Parliament has not made significant progress on new legislative initiatives, including Draft Law №11115 on the regulation of information-sharing platforms that disseminate mass information. Draft Law №11492 was withdrawn, while Draft Law №12406 concerning sanctions was adopted at first reading. Draft Law №13505 on the prohibition of the use and dissemination of hostile software products and hostile information technologies has also been submitted for consideration. Draft Law №13311 on the liability of NSDC members for illegal decisions regarding sanctions has been registered, but its prospects for adoption remain limited.

The Russian Federation, as an aggressor state, continues to inflict damage on the sector. As of the end of 2024, the overall impact on the sector is estimated at over USD 2.24 billion in damage, USD 2.38 billion in losses, and USD 5.86 billion in recovery needs, exceeding previous estimates due to ongoing infrastructure destruction and rising operational costs. No direct mass restrictions on access to legitimate online media have been recorded. Restrictions are applied selectively—partly through the sanctions mechanism and partly via the National Center for Operational Management of Telecommunications Networks.

Challenges arise from the specific nature of digital services regulation, including that such services are subject to the jurisdiction of other countries and private company policies. Ukraine maintains a high level of digitalisation, provides access to 4G mobile networks, is gradually implementing 5G, and is testing the Starlink Direct to Cell technology.

The overall score in this area, as well as the assessments of legislation and practice, remain the same as in the previous reporting period. The recommendations from the previous report regarding the updating of legislation related to the use of artificial intelligence (AI) and the promotion of further development of digital services and technologies in Ukraine remain relevant. The state must also regulate access to electronic information resources and establish clear conditions for any restrictions placed on such access.

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

Dedicated legislation governing digital rights in Ukraine is still evolving. There is not a single, comprehensive law or regulation that fully regulates this issue. The Law on Digital Content and

Digital Services,²⁸⁰ which regulates the relationship between service providers and consumers regarding the provision of digital content or services, is the most relevant. Restrictions on the exercise of certain digital rights, including freedom of expression and privacy, continue to be imposed under martial law.

Ukrainian citizens' access to the internet and internet resources is practically unrestricted, with the exception of access to Russian services and resources. According to experts,²⁸¹ restrictions on digital rights are generally based on the principles of legality, legitimacy, proportionality, and necessity. At the same time, in 2025, the practice of blocking websites and pages remained fragmented: in some instances, blocks are imposed as sanctions adopted by the National Security and Defence Council of Ukraine and enacted by a Presidential Decree or by a court,²⁸² while others are imposed by the National Center for Operational Management of Telecommunications Networks (NCU).²⁸³ The NCU issued approximately 200 blocking orders in 2025²⁸⁴. This bifurcation of approach creates a risk of inconsistent interpretation and lack of clear procedures. In addition, the European Court of Human Rights (ECHR) is considering four cases against Ukraine (which were consolidated into one proceeding²⁸⁵) regarding the blocking of Russian websites in 2017.²⁸⁶

On 23 May 2025, Draft Law №13311²⁸⁷ was registered in Parliament, proposing to establish liability for members of the National Security and Defence Council of Ukraine for illegal decisions made during the application of sanctions. Its provisions could potentially be applied to NSDC members who use sanctions in the form of website blocking, which is not explicitly

²⁸⁰ Law on Digital Content and Digital Services, No. 3321-IX, 10.08.2023 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/3321-20#Text>.

²⁸¹ Maksym Dvorovyi, Head of the "Digital Rights" program at the public organisation "Digital Security Laboratory," during an interview on 5 September 2025.

²⁸² Law of Ukraine on Sanctions, No. 1644-VII, updated 01.08.2025 (in Ukrainian),

<https://zakon.rada.gov.ua/laws/show/1644-18#top>.

²⁸³ It operates under the State Special Communications Service. Its powers are defined by Resolution of the CMU on Some Issues of Operational and Technical Management of Electronic Communication Networks in Conditions of an Emergency, Extraordinary, or Martial Law, No. 75, 24.01.2025 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/75-2025-%D0%BF#Text>.

²⁸⁴ Decree of the National Center for Ukraine "On Restricting Access to the Internet Resource" (in Ukrainian), <https://cip.gov.ua/ua/filter?tagId=60751>.

²⁸⁵ Application no. 79083/17 Artur Volodymyrovych BOYAROV against Ukraine and 3 other applications (see list appended) communicated on 28 August 2024, <https://hudoc.echr.coe.int/#%22itemid%22:%22001-236029%22>.

²⁸⁶ Detector Media, 'The European Court of Human Rights is considering four cases against Ukraine regarding the blocking of Russian websites in 2017', 13.03.2025 (in Ukrainian), <https://detector.media/infospace/article/238227/2025-02-13-iespl-rozghlyadaie-chotyry-pozovy-proty-ukrainy-chez-blokuvannya-rosiyskykh-saytiv-u-2017-rotsi/>.

²⁸⁷ Draft Law on Amendments to Certain Laws of Ukraine to Establish Liability for Members of the National Security and Defence Council of Ukraine for Adopting Illegal Decisions in the Implementation of Sanctions, No. 13311, 23.05.2025 (in Ukrainian). <https://itd.rada.gov.ua/billinfo/Bills/Card/56464>.

provided for under Ukrainian law. The draft law is under consideration but its chances of adoption are limited, as it was submitted by opposition MPs.²⁸⁸

Calls for stricter regulation of Telegram²⁸⁹—given its active use by the Russian Federation for cyber operations, including phishing attacks, malware distribution, user geolocation tracking, and missile strike adjustments—did not lead to concrete legislative initiatives during the reporting period.

No legislative steps were taken with respect to previously submitted initiatives, namely Draft Law №11115²⁹⁰ on regulating information-sharing platforms that disseminate mass information. Draft Law №11492²⁹¹ on prohibiting the use of software products and access to electronic information resources was withdrawn. However, Draft Law №13505²⁹² on the prohibition of the use and dissemination of hostile software products and hostile information technologies has been submitted for consideration.

The Criminal Code²⁹³ establishes penalties for extremism, separatism or terrorism, including their promotion 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, which makes it harder to prove and legally categorise such actions. Prosecution is also made difficult by the very nature of violations on the internet, which are likely to be cross-border and therefore outside the jurisdiction of the state of Ukraine. Difficulties also arise from the policies of certain online platforms, particularly content moderation on social media, and the absence of a mechanism to enforce EU requirements in non-member states.

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.

²⁸⁸ IMS, Digital Security Lab Ukraine. Media and Digital Rights Regulation in Ukraine, Digest #23, May 2025, <https://dslua.org/wp-content/uploads/2025/06/Digest-23-May-2025.pdf>.

²⁸⁹ 24 Channel, 'Stefanchuk (Chairman of the Verkhovna Rada of Ukraine) explained why the Verkhovna Rada might ban Telegram', 19.07.2025 (in Ukrainian), https://24tv.ua/zaborona-telegram-stefanchuk-nazvav-prichini-yaki-mozhut-posluguвати_n2873911.

²⁹⁰ Draft Law on Amendments to Certain Laws of Ukraine Regarding the Regulation of Activity of Information-Sharing Platforms That Distribute Mass Media Content, No. 11115, 25.03.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/43884>.

²⁹¹ Draft Law on Amendments to the Law on Sanctions on the prohibition of the use of software products and access to electronic information resources, No. 11492, 19.08.2024 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/44743>.

²⁹² Draft Law on the Prohibition of the Use and Distribution of Hostile Software Products and Hostile Information Technology Tools, No. 13505, 18.07.2025 (in Ukrainian), <https://itd.rada.gov.ua/billInfo/Bills/Card/56784>.

²⁹³ Criminal Code, No. 2341-III, 05.04.2001 (in Ukrainian), <https://zakon.rada.gov.ua/laws/show/2341-14#Text>.

Experts note²⁹⁴ that attacks continued in 2025, particularly targeting the independent online media and CSOs. However, no direct “overblocking” or mass restriction of access to legitimate online media was recorded.

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. In 2025, the gradual rollout of 5G began. Pilot sites in Lviv, Kharkiv, and Borodianka are operational, but a nationwide launch has been postponed. Testing of Starlink Direct to Cell — a satellite communication technology that allows smartphones to connect to a network without mobile towers²⁹⁵ — is also ongoing. Ukraine has gained access to the European internal roaming market and, starting in 2026, will become a full participant in the “Roam Like at Home” system, which is an important step in Ukraine’s digital integration with the EU.²⁹⁶

Digitalisation—including the development of digital services and technologies, cybersecurity, robotics, and automation—continues to be a state priority.

The telecommunications, digital technology, and media sectors continue to suffer from the aggression of the Russian Federation. As of 31 December 2024, the total impact on this sector is estimated at over USD 2.24 billion in damage, USD 2.38 billion in losses, and USD 5.86 billion in recovery needs. Damage estimates presented in Fourth Rapid Damage and Needs Assessment (RDNA4) exceed those in RDNA3 by 7 per cent, while losses are 21 per cent higher due to ongoing infrastructure destruction which increases operational costs for repairs.²⁹⁷ By the end of 2024, approximately 12.2 per cent of households had lost access to mobile services, affecting personal communications, the provision of critical services, and economic activity.²⁹⁸ The sector continues to face persistent attacks and consequent impacts on users—for example, as a

²⁹⁴ Maksym Dvorovyi, Head of the “Digital Rights” program at the public organisation “Digital Security Laboratory,” during an interview on 5 September 2025.

²⁹⁵ Ministry of Digital Transformation of Ukraine, ‘Satellite connectivity on smartphones, 600,000+ issued Diia.Cards, and AI integration: Mykhailo Fedorov on digital innovations for Ukraine’, 18.08.2025 (in Ukrainian), <https://thedigital.gov.ua/news/suputnik-u-smartfoni-600-000-oformlenikh-diya-kartok-ta-integratsiya-shi-mikhaylo-fedorov-pro-tsifrovi-novinki-dlya-ukraini>.

²⁹⁶ Ministry of Digital Transformation of Ukraine, ‘Ukraine is the first country outside the European Union to join the EU’s single roaming zone, Roam like at Home’, 26.08.2025 (in Ukrainian), <https://thedigital.gov.ua/news/ukraina-persha-kraina-poza-mezhami-evrosoyuzu-yaka-priednaetsya-do-edinoi-roumingovoi-zoni-es>.

²⁹⁷ World Bank Group, Government of Ukraine, European Commission, United Nations. UKRAINE - Fourth Rapid Damage and Needs Assessment (RDNA4): February 2022 - December 2024, <https://www.undp.org/ukraine/publications/ukraine-fourth-rapid-damage-and-needs-assessment-rdna4-february-2022-december-2024-english>.

²⁹⁸ Data Center Dynamics, ‘Rebuilding Ukraine’s Telecommunications Infrastructure Amid War: Plans to modernize the country’s networks have been delayed, but 5G could be on its way, 09.01.2024., <https://www.datacenterdynamics.com/en/analysis/rebuilding-ukraines-telecoms-infrastructure-amid-war/>.

result of a Russian attack on a civilian infrastructure facility on the evening of 26 September 2025, nearly 9,000 subscribers in Zaporizhzhia were left without electricity.²⁹⁹

AI regulation is under active development in Ukraine, primarily due to the extensive use of AI in the public sector.³⁰⁰ However, a systematic regulatory framework is still lacking—most documents are fragmentary and have been developed with limited expert resources. The Ministry of Digital Transformation and the Ministry of Strategic Communications are open to cooperation with those who bring concrete proposals or are ready to implement parts of the work; however, there is no proactive engagement with civil society organisations. Expert discussions on responsible AI use continue but a shortage of specialists hinders their sustainability.³⁰¹ The Digital Security Lab has developed criteria for assessing the state of human rights compliance in the digital environment, particularly in AI, to enable a systematic analysis of Ukraine’s implementation of international obligations in the context of digital transformation, European integration, and martial law.³⁰²

²⁹⁹ Rubryka, ‘In Vinnytsia region, the enemy attacked critical infrastructure, and in Zaporizhzhia, nearly 9,000 subscribers were left without power due to a Russian Federation attack’, 27.09.2025 (in Ukrainian), <https://rubryka.com/2025/09/27/vorog-atakuvav-krytychnu-infrastrukturu/>.

³⁰⁰ Ministry of Digital Transformation of Ukraine, ‘The Ministry of Digital Transformation will develop the infrastructure for implementing AI in public services – we are working on the AI Factory’, 07.08.2025 (in Ukrainian), <https://thedigital.gov.ua/news/mintsifra-rozvivatime-infrastrukturu-dlya-vprovadzhennya-shi-v-derzhavni-servisi-pratsyuemo-nad-ai-factory>.

³⁰¹ Maksym Dvorovyi, Head of the “Digital Rights” program at the public organisation “Digital Security Laboratory,” during an interview on 5 September 2025.

³⁰² Digital Security Lab Ukraine, Criteria for assessing the state of human rights compliance in the digital environment, 2025 (in Ukrainian), https://dslua.org/wp-content/uploads/2025/07/KRYTERIYI_final-1.pdf.

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, taking into account European integration obligations, including alignment with the EU Digital Services Act (DSA);
- 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 form of dialogue with a wide range of stakeholders on ensuring that digital rights are in line with human rights standards.

IV. KEY PRIORITIES

The armed aggression of the Russian Federation against Ukraine continues to exert a profound impact on Ukrainian civil society, affecting both the capacity of the state and the ability of CSOs to engage in meaningful reforms across all 11 areas of the CSO Meter. Nevertheless, efforts to counter Russian aggression and advance Ukraine's European integration have strengthened CSOs' resolve to pursue systemic change.

Of the seven key priority recommendations outlined in the 2024 CSO Meter report for Ukraine, three were partially addressed in 2025. Notably, the groundwork was laid for the introduction of an online service for CSO registration via the "Diia" portal, and CSOs have increasingly participated in the development of programmatic and policy documents. Investigations into attacks on journalists and civic activists, particularly those perpetrated by the Russian Federation, have also continued.

The overall score for the CSO environment in Ukraine in 2025 is **4.7 out of 7**, largely due to ongoing challenges, in particular those resulting from the war.

In 2025, seven recommendations were identified out of a total of 40, covering 11 sectors, with the key priorities for the next period being:

1. 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;
2. The Parliament of Ukraine should review the provisions of the Law on Public Consultations, implement it immediately, and give effect to the obligation of MPs to hold public consultations;
3. The National Bank of Ukraine (NBU) should facilitate CSOs' access to banking services on an equal footing with businesses, including with respect to 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 the armed aggression;
4. Law enforcement, including the Prosecutor General's Office, should continue investigating and documenting Russian crimes against CSO representatives and the media to hold the Russian Federation accountable;

5. The Ministry of Digital Transformation and the Ministry of Justice should ensure that the “Diia” portal service for registering and updating information on CSOs, including both public associations and charitable foundations, is fully functional;
6. The CMU, through its authorised bodies, should ensure equal access for CSOs to public procurement and promote the broad dissemination of information to CSOs regarding such access; and
7. The Parliament of Ukraine should adopt the Draft Law on the Regulation of the Activities and State Registration of Public Associations (registration No. 8084).

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 2025.

Monitoring process

The process involved data collection and analysis. The main methods used in this report were desk research, as well as nine in-depth interviews, three consultations, and two focus group discussions with representatives of local CSOs (8 participants) and national CSOs (8 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:

- Olga Lymar – Executive Director, Public Association “Reanimation Package of Reforms Coalition”
- Dmytro Ukraiinskyi – Deputy Director, Centre of Policy and Legal Reform
- Yevheniia Kubakh – Development Director, Centre for Civil Liberties
- Olesya Tkachuk – Project Coordinator, Public Association “Razom Proty Koruptcii”
- Maksym Shcherbatyuk – Program Director, Ukrainian Helsinki Human Rights Union
- Natalia Povtar – Legislative Lawyer for CSOs
- Mariya Heletiy – Independent Expert on Civil Society and Political Processes
- Violeta Artemchuk – Chief Coordinator-Director, NGO “Donbas SOS”
- Maksym Latsyba – Head of the Civil Society Development Program, UCIPR
- Iryna Gayduchyk – Executive Director, NGO “Volyn Resource Center for Local Democracy Development”

The draft narrative country report was reviewed by the Advisory Board members at an online meeting held on 31 October 2025. 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 any significant changes compared to the report for the previous period. The final score for each standard was 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 was then calculated as the average of the final scores for each standard and was 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/>.

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