

## Stakeholder Engagement Plan (SEP)

### Strengthening Ukraine's Statistical Systems for Recovery and Reform Project.

#### 1. Introduction / Project Description

##### 1.1 Background and Project Overview

Ukraine's official statistical system has faced significant disruption since Russia's full-scale invasion in February 2022. Following the introduction of martial law, the State Statistics Service of Ukraine (SSSU) suspended the collection of household surveys — including the Household Budget Survey (HBS), the Labor Force Survey (LFS), the EU Statistics on Incomes and Living Conditions (EU-SILC), and the Survey of Agricultural Activity of the Rural Population (AAS) — with the last official rounds conducted in 2021. This suspension has created a critical gap in socio-economic data at a time when reliable, timely, and internationally comparable statistics are most urgently needed to support recovery planning, reconstruction prioritization, and ongoing reform processes, including Ukraine's EU accession agenda.

In response, the World Bank is providing grant financing for the **Strengthening Ukraine's Statistical Systems for Recovery and Reform** project. The Grant aims to strengthen Ukraine's capacity to produce timely, reliable, and internationally aligned population-based survey data under current challenging wartime operating conditions to support recovery, resilient reconstruction, and reform planning. The improvement of the quality, timeliness, and accessibility of official statistics is critical for the formation of state policy, the development of socio-economic programs, and for monitoring the implementation of Ukraine's international obligations — particularly in the context of European integration and the Sustainable Development Goals (SDGs). Activities will be conducted over a 30-month period, with an additional 3 months allocated for auditing.

##### 1.2 Project Components

The project is structured around three components:

**Component 1: Resumption of Collection of Household Surveys** supports the resumption of at least four key population and household surveys in 2026: the Household Budget Survey (HBS), EU-SILC, the Labor Force Survey (LFS), and the Survey of Agricultural Activity of the Rural Population (AAS). Together, these surveys will yield more than 100,000 completed interviews per year. The grant finances enumerator remuneration, data collection tools (including tablets), respondent incentives, public information campaigns, and call center functions to facilitate remote data collection under wartime conditions. Fieldwork for HBS, EU-SILC, and LFS will be

conducted in 22 regions, while the AAS will be conducted in 20 regions, excluding areas directly affected by active conflict. An estimated 540 enumerators will be engaged across all surveys, with the grant supporting additional enumerators beyond SSSU's current workforce.

**Component 2: Introduction of Innovative Data Collection Methods** supports the modernization of statistical production and alignment with EU statistical requirements. This includes the development of a statistical business register (SBR) in accordance with EU regulations, revision and production of structural and short-term business statistics, development of road freight transport indicators using administrative data, update of sampling methodologies for the four household surveys, and improvements to national accounts and GDP measurement in line with Eurostat standards. The component will contract statistical experts and programmers, procure high-performance equipment, and develop administrative data exchange interfaces. Implementation will be carried out in close coordination with Eurostat and partner National Statistical Offices.

**Component 3: Project Management** covers the costs of project coordination, including a Project Coordinator, procurement specialist, environmental and social specialist, and a financial audit firm. Three financial audits will be conducted over the project's duration.

### **1.3 Project Location and Beneficiaries**

The project operates at national scale across Ukraine. Primary direct beneficiaries are SSSU staff, including enumerators and call center operators engaged in survey fieldwork, as well as SSSU's technical and management personnel involved in statistical methodology development. Secondary beneficiaries include households and individuals participating as survey respondents across up to 22 oblasts, government policy-makers and ministries relying on official statistics, civil society, the donor and international community, and the general public. The project explicitly excludes fieldwork in some oblasts taking into account security situation in Ukraine.

### **1.4 Purpose and Structure of the SEP**

The Project does not involve civil works. The Project is being prepared and implemented under the World Bank's Environmental and Social Framework (ESF). In accordance with ESS10 on Stakeholder Engagement and Information Disclosure, the implementing agency will provide stakeholders with timely, relevant, understandable, and accessible information, and will engage with them in a culturally appropriate manner that is free of manipulation, interference, coercion, discrimination, or intimidation. This SEP defines the approach for stakeholder identification, engagement, information disclosure, and grievance redress throughout the Project lifecycle.

## **2. Objective/Description of SEP**

The overall objective of this SEP is to establish a structured and inclusive approach to stakeholder engagement for the “Strengthening Ukraine’s Statistical Systems for Recovery and Reform. Investing in Secure Data Collection under Wartime Conditions” Project throughout the entire Project lifecycle.

The SEP defines the principles, methods, and responsibilities for engaging with stakeholders, including timely public information disclosure and meaningful consultation during Project preparation and implementation. It outlines how the Project implementing agency will communicate with affected parties and other interested stakeholders, ensure access to relevant and understandable information, and take stakeholder views into account in Project decision-making.

The SEP also establishes a grievance mechanism through which stakeholders can raise concerns, provide feedback, or submit complaints related to Project activities, including environmental and social issues, in a transparent, accessible, and timely manner. The SEP is designed to ensure that stakeholder engagement is inclusive, culturally appropriate, and responsive to the operating context, including security and access constraints arising from wartime conditions in Ukraine, in accordance with ESS10.

### **2.1. Principles of Effective Stakeholder Engagement**

The project's stakeholder engagement activities are guided by the following core principles, drawn from international best practice:

#### **Openness and life-cycle approach:**

Stakeholder engagement is undertaken throughout the entire Project lifecycle, including preparation, implementation, and completion. Consultations are carried out in an open and transparent manner, free from external manipulation, interference, coercion, or intimidation.

#### **Informed participation and feedback:**

Relevant Project information is disclosed in a timely, clear, and understandable manner and in formats appropriate to different stakeholder groups. Opportunities are provided for stakeholders to provide feedback, raise concerns, and express views, which are reviewed and addressed by the Project implementing agency.

#### **Inclusiveness and sensitivity:**

Stakeholder identification is undertaken to support effective communication and relationship-building. The engagement process is inclusive, and all stakeholders are encouraged to

participate. Equal access to information is provided, with sensitivity to stakeholders' needs guiding the choice of engagement methods. Special attention is given to vulnerable or disadvantaged groups who may be at risk of exclusion, including women, elderly persons, persons with disabilities, internally displaced persons, and populations in conflict-affected or hard-to-reach areas.

### **Flexibility:**

Given the security situation and wartime conditions in Ukraine, engagement methods are adapted as necessary. Where face-to-face engagement is constrained by security, access, or safety considerations, alternative methods such as online consultations, telephone communication, and written feedback mechanisms are used to ensure continued stakeholder engagement.

These principles inform all engagement activities described in the subsequent sections of this SEP.

## **3. Stakeholder identification and analysis**

### **3.1. Affected parties and other interested parties 1**

**Affected Parties** - include individuals and groups that may be directly affected by Project activities, either positively or negatively. Given the nature of the project, potential impacts on affected parties are expected to be limited and primarily relate to participation in surveys, interaction with Project staff, data confidentiality, and health, safety, and security considerations during field activities.

For this Project, affected parties include, inter alia:

**Project workers** who interact with the public, including:

- **Enumerators and field staff** (540 across all surveys and 165 additionally hired with grant support) conduct fieldwork under challenging wartime conditions. Their remuneration, working arrangements, equipment, and personal safety are directly determined by how the project is implemented.
- **Call center operators** (200) are engaged specifically under this project to conduct remote interviews and follow-ups. Their workstations, software, working conditions, and employment are directly financed by the grant.
- **SSSU staff** involved in survey management, methodology development, and statistical production are directly engaged in day-to-day project implementation and are affected by changes in workload, tools, and institutional processes.

**Survey respondents and households** across up to 22 oblasts are directly approached to participate in data collection activities, dedicating their time and sharing personal socio-economic information, including:

- **Households** participating as respondents in household surveys and data collection activities;
- **Communities** where in-person survey activities or interviews are conducted;
- **Individuals** whose personal data are collected and processed as part of statistical surveys.

**The State Statistics Service of Ukraine (central and regional offices)** are the primary implementing agency and main institutional beneficiary of the project, with staff directly engaged in survey management, fieldwork supervision, and methodology development, benefiting from upgraded equipment, expanded staffing, and institutional modernization, while also facing increased workload, change management demands, and security risks for regional staff operating under wartime conditions.

**Policy decision makers:**

- Cabinet of Ministers of Ukraine: Will benefit from more timely, reliable, and disaggregated statistics, enabling stronger coordination of recovery policies, better prioritisation of reconstruction efforts, and more evidence-based decision-making at the national level.
- Ministry of Finance of Ukraine: Will gain access to improved and better-integrated fiscal and macroeconomic data, enhancing budget planning, expenditure tracking, and donor coordination, while increasing transparency and credibility in public financial management.
- National Bank of Ukraine: Will be supported by higher-quality and more frequent statistical inputs, improving monetary policy formulation, inflation analysis, and financial stability monitoring, particularly under conditions of economic uncertainty.
- Verkhovna Rada of Ukraine: Will have improved access to consistent and credible statistical evidence, strengthening legislative drafting, oversight functions, and monitoring of government performance and reform progress.

**Data holders:**

- State Tax Service of Ukraine: Will be required to enhance data sharing practices and interoperability with the statistical system, including possible upgrades to data formats and transmission mechanisms. In return, it will benefit from clearer standards and more efficient use of administrative data.
- State Customs Service of Ukraine: Will be affected through strengthened integration of customs data into statistical production processes, requiring improved data quality controls and timeliness, while benefiting from streamlined reporting and reduced duplication.

- Pension Fund of Ukraine: Will need to align its administrative data with updated statistical standards and data exchange protocols. The project will improve the usability of its data for labour and social statistics and may support system modernization.
- Ministry of Justice of Ukraine: Will be involved in improving access to and quality of civil registration and business registry data, including harmonization with statistical classifications and digitalization efforts, enhancing the overall reliability of demographic and business statistics.
- Ministry of Social Policy of Ukraine: Will strengthen its data systems and reporting practices, particularly regarding vulnerable populations and IDPs. The project will improve data integration and enable better targeting and monitoring of social and recovery programmes.

**3.2. Other Interested Parties** include individuals, groups, or institutions that are not directly affected by Project activities but have an interest in Project outcomes.

These include:

The State Statistics Service of Ukraine (central and regional offices) - As the main producer of official statistics and likely implementing body, it has a direct institutional and operational interest in the project's success. The project will strengthen its capacity through modernised data collection methods (including secure and remote data collection in wartime conditions), upgraded IT infrastructure, and improved statistical methodologies aligned with international standards. It is also interested in enhanced access to administrative data from other government bodies, which will reduce response burden and improve efficiency. Overall, the project supports its strategic goal of producing high-quality, timely, and reliable statistics while increasing resilience, credibility, and user trust in the statistical system.

**Central and local government institutions** - rely on official statistical data for policy formulation and decision-making;

**Academic, research, and analytical institutions** — universities and think tanks with an interest in data quality, methodology, and public accessibility of statistical outputs.;

**Civil society organizations (CSOs) and Non Government Organizations (NGOs)**, including those focused on transparency, data protection, and social inclusion;

**National and local media** — relevant to the public information campaigns under Component 1 and influential in shaping public willingness to participate in surveys.

**IT service providers, consultants, and contractors** engaged under the Project;

**International development partners and donors** (EU, UNDP, IMF) — rely on reliable Ukrainian statistics to inform their own recovery programming and assessments.

**Eurostat** — have a direct interest in the quality and EU-alignment of statistical outputs, given Ukraine's EU accession agenda, and will review updated indicators and national accounts.

**General public** — as indirect users of policy decisions informed by the statistics produced under this project.

**The World Bank** — as the financing institution, has an interest in successful implementation and compliance with the Environmental and Social Framework.

### **3.3. Disadvantaged/vulnerable individuals or groups<sup>2</sup>**

Within the context of the Project, vulnerable or disadvantaged groups may include individuals or households who face barriers to accessing information, participating in engagement processes, or benefiting Project activities. These groups may include, but are not limited to:

- Internally displaced persons and conflict-affected households;
- Elderly persons and persons with disabilities, including those requiring assistance to participate in surveys;
- Households located in remote, rural, or hard-to-reach areas;
- Individuals with limited digital access or low digital literacy.
- Low- income households with limited access to communication technology;

Potential barriers include security constraints, mobility limitations, limited access to digital communication tools, and reduced trust in public institutions. While the Project does not specifically target these groups, engagement approaches will be adapted as appropriate to ensure inclusiveness, including the use of clear communication, alternative data collection methods, and remote engagement options.

The project will ensure inclusiveness in data collection by combining multiple data sources and collection methods to reach all relevant population groups, including internally displaced persons, residents of hard-to-reach and conflict-affected areas, rural populations, and other vulnerable groups. This will be achieved through mixed-mode data collection (online, telephone, and face-to-face where feasible), stronger use of administrative data, and updated sampling frameworks that reflect population displacement and territorial changes. Regional offices of the State Statistics Service will support local outreach and engagement, helping to include hard-to-reach communities. In addition, improved data quality monitoring will help identify and address coverage gaps, ensuring more representative and unbiased statistical outputs.

Vulnerable groups within communities affected by the Project may be further identified and confirmed during implementation. Where necessary, targeted and dedicated engagement measures will be applied to ensure their meaningful participation. The methods of stakeholder engagement are described in the subsequent sections of this SEP.

## **4. Stakeholder Engagement Program**

### **4.1. Current Restrictions Affecting Public Consultations and Information Disclosure**

Since the declaration of martial law on February 24, 2022 — continuously extended and currently in force until today— a comprehensive set of legal restrictions has significantly constrained the conditions under which broader public consultations could be conducted during project preparation and implementation as well as restriction to specific information disclosure. These restrictions arise from multiple binding layers of Ukrainian legislation.

Constitutional restrictions. Presidential Decree No. 64/2022 invoked constitutional provisions (Articles 30–34, 38–39) to formally restrict freedom of assembly, freedom of speech, secrecy of correspondence, and non-interference in private and family life — all of which are foundational to conventional public consultation processes. <https://zakon.rada.gov.ua/laws/show/64/2022>

Law "On the Legal Regime of Martial Law" (No. 389-VIII, 2015). This law empowers military administrations to prohibit or restrict public gatherings and assemblies, impose movement restrictions between regions, and restrict the transmission of information through communication networks where national security risks are present. These powers have been actively exercised across oblasts where project fieldwork is planned. <https://zakon.rada.gov.ua/laws/show/389-19#Text>

Law "On State Statistics" (2000) <https://zakon.rada.gov.ua/laws/annot/2614-12?lang=en> and SSSU internal policies. The Law on State Statistics establishes a strict confidentiality regime prohibiting disclosure of information that could identify respondents or reveal operational details of statistical surveys. Under martial law, the SSSU applies these provisions with heightened stringency, and its internal policies — derived directly from this law — restrict public disclosure of survey operational details during the preparation phase.

Practical constraints. Beyond the legal framework, curfews, infrastructure disruptions from air raids, internet and electricity blackouts, and the mobilization of a large share of the working-age population make conventional public consultation formats — public hearings, community meetings, open online consultations — neither safely nor reliably feasible in the current environment.

These restrictions are temporary and context-specific. The project commits to progressively expanding stakeholder engagement as legal constraints are lifted and conditions permit, in full compliance with ESS10.

The State Statistics Service of Ukraine (SSSU) is the central executive authority responsible for the formation and implementation of state statistical policy, coordination of the national statistical system, and production and dissemination of official statistics across economic, social, demographic, and environmental domains. It operates through a central office and a network of regional statistical offices covering all oblasts of Ukraine. Under Ukrainian legislation, the SSSU functions as a central government authority with professional independence in the production of official statistics, ensuring objectivity, reliability, and international comparability of statistical data. While it is not formally designated as “critical infrastructure” in the strict legal sense applied to physical infrastructure, its systems and data are considered part of the country’s critical information infrastructure, given their essential role

in economic governance, public administration, and recovery and reconstruction planning, particularly under conditions of martial law.

In accordance with Ukrainian legislation on state statistics, the SSSU operates under a clear framework distinguishing between information subject to public dissemination and information subject to confidentiality. Publicly disclosable information includes aggregated and anonymised statistical data such as macroeconomic, demographic, labour, price, and sectoral statistics, as well as methodologies, classifications, and published statistical reports. These outputs are released in line with the official statistical dissemination plan and are designed to ensure transparency and public access to reliable data. At the same time, the SSSU is legally obliged to protect statistical confidentiality. This includes primary (unit-level) data collected from individuals, households, and enterprises, as well as any administrative microdata that could allow re-identification of respondents. Such information is strictly protected under Ukrainian law and cannot be publicly disclosed, as it constitutes confidential information and may also fall under other restricted access categories, including personal data, commercial confidentiality, or state security protections.

The Stakeholder Engagement Plan (SEP) is generally considered a non-sensitive document and can be published in full, as it outlines stakeholder identification, engagement methods, and consultation processes without containing classified or operationally sensitive information. Partial restrictions would only be justified in cases where specific details could compromise the safety of staff or respondents in conflict-affected areas or reveal sensitive data collection or IT security arrangements. In such cases, any limitations on disclosure would be based on Ukrainian legislation governing protection of confidential statistical information and rules on restricted-access information, including considerations of national security and operational safety. The same principle applies to the Environmental and Social Commitment Plan (ESCP) and related environmental and social instruments, which are in principle fully disclosable to ensure transparency and stakeholder engagement, with narrowly defined exceptions applied only where necessary to protect sensitive operational or security-related information.

#### **4.2. Summary of stakeholder engagement done during project preparation**

During Project preparation, stakeholder engagement activities were carried out in a manner proportionate to the nature of the Project and taking into account security and access constraints arising from wartime conditions in Ukraine. Consultations were conducted primarily through bilateral and technical meetings, as well as virtual exchanges, with key institutional stakeholders involved in Project design and implementation.

These engagements included consultations with representatives of the SSSU at central and regional levels, as well as discussions with relevant government counterparts, media and technical experts, focusing on Project objectives, scope of activities, implementation arrangements, data confidentiality, labour considerations, and environmental and social risk management. Broader public consultations were not conducted during the preparation stage

because of existing restrictions on sharing sensitive information, imposed by the Constitution of Ukraine, the martial law legal regime, as well as respective internal policies of the SSSU, which arise out of the above-mentioned restrictions.

Feedback received during Project preparation has to emphasise the importance of ensuring data protection and statistical confidentiality, safeguarding the rights and safety of survey respondents and Project workers, and maintaining flexibility in engagement and data collection approaches under wartime conditions. These considerations will be reflected in the Project design and integrated into the SEP through the inclusion of tailored stakeholder engagement methods, grievance redress mechanisms, and measures addressing community health, safety, and security risks. A summary of key stakeholder engagement activities conducted during Project preparation and key issues raised is provided below:

<b>Stakeholder (Group or Individual)</b>	<b>Dates of Consultations</b>	<b>Summary of Feedback</b>	<b>Response of Project Implementation Team</b>	<b>Follow-up Action(s)/Next Steps</b>	<b>Timetable/ Date to Complete Follow-up Action(s)</b>
Technical experts (in the matter of statistics)	December 18 <sup>th</sup> , 2025	Requested stronger alignment with national policies and labour legislation.	Confirmed alignment with applicable national frameworks and agreed to integrate labour management procedures and environmental and social mitigation measures into Project instruments.	Organise technical validation meeting on labour management arrangements.	Prior to Project effectiveness date.
Government counterparts	January 12 <sup>th</sup> , 2026	Recommended establishing clear monitoring and feedback mechanisms to	Ensure that stakeholder feedback is periodically reviewed.	Collect structured feedback from stakeholders.	First internal review after two months of the Project start date.

		track implementation.			
Regional offices of the State Statistics Service of Ukraine	February 9 <sup>th</sup> , 2026	Highlighted operational constraints due to security conditions and staff shortages. Requested flexibility in timelines and additional technical support for restarting household surveys.	Agreed to apply a phased and flexible approach to survey resumption, considering regional security assessments. Confirmed provision of targeted technical assistance and remote support tools.	<ul style="list-style-type: none"> <li>- Conduct coordination meetings with each regional office prior to rollout.</li> <li>- Provide ongoing technical support during initial survey restart phase.</li> </ul>	<ul style="list-style-type: none"> <li>- Coordination calls within 1 month of the Project start date.</li> <li>- Ongoing support during the implementation process.</li> </ul>

This SEP has been disclosed at the [redacted] and consultations with stakeholders have been conducted on [redacted].

Key summary of the consultations:  
Detailed information provided in Annex 1.

#### 4.2. Summary of project stakeholder needs and methods, tools, and techniques for stakeholder engagement

Different engagement methods are proposed and cover different stakeholder needs for the different activities, as stated described in the table below.

#### 4.3. Stakeholder engagement plan

Project Component	Estimated Date / Time Period	Topic of Consultation / Message	Method Used	Target Stakeholders	Responsibilities
-------------------	------------------------------	---------------------------------	-------------	---------------------	------------------

Component 1: Resumption of Household Surveys	Throughout Project implementation	Purpose of surveys, voluntary participation, data confidentiality, grievance mechanisms	One-on-one interviews (CATI/CAPI); telephone communication; information scripts; public information materials	Survey respondents; affected communities (Targeted outreach, mixed-mode collection, regional office support, accessible materials, disability accommodations, flexible scheduling)	SSSU; PIU; contracted interviewers
Component 1: Resumption of Household Surveys	Throughout Project implementation	Health, safety, and security considerations during data collection, grievance redress mechanism channels for workers, EPRP	Interviewer briefings; training sessions; internal guidance; Publication of information related to GRM	Project workers (interviewers, call centre staff, SSSU staff)	SSSU; PIU ; regional focal points
Component 1 and 2	Before any physical works execution and throughout project implementation	ES requirements including project site screening, OHS, waste management	Official letter, meetings	Contractors	SSSU; PIU
Component 2: Introduction of Innovative Data Collection Methods	Periodically during implementation	Methodological changes, use of administrative and alternative data, data protection	Technical meetings; workshops; virtual consultations	SSSU (central and regional offices); government data users; academic institutions	SSSU; PIU
Component 3: Project Management and Implementation Support	Throughout Project implementation	Project progress, implementation arrangements,	Formal meetings; internal coordination meetings;	SSSU management; PIU; World Bank	SSSU; PIU

		E&S compliance	written reports		
Component 3: Project Management and Implementation Support	Before project activities started and then throughout project implementation	E&S compliance at the regional level, communication arrangements with enumerators, reporting, supervision and GRM	Formal meetings; internal coordination meetings; written reports	ESHS regional focal points	SSSU; PIU
All Components	Continuous	Disclosure of Project information and E&S documents (SEP, ESCP)	Official websites; written disclosures	General public; interested stakeholders	SSSU; PIU
All Components	Continuous	Receipt and resolution of stakeholder feedback and grievances	Grievance Mechanism (email, phone, written submissions)	All stakeholders	SSSU; PIU
All Components	At Project completion	Disclosure of Project results and lessons learned	Publication of summary information; official website	General public; interested stakeholders	SSSU; PIU

### Proposed Strategy for Information Disclosure

Stakeholder Group	Project Information Shared	Means of Communication / Disclosure
Survey respondents (households and individuals)	Purpose of surveys, voluntary participation, data confidentiality, grievance mechanisms	One-on-one interviews (CAPI); telephone communication (CATI); interviewer scripts; verbal explanations; online portal, printed materials, interviews on TV and Radio
Communities where in-person data collection is conducted	Overview of survey activities, health and safety considerations	Direct communication by interviewers; public information materials, local

		online communities, local printed media, radio, TV, online portal, printed materials, interviews on TV and Radio awareness raising campaign.
Project workers (interviewers, call centre staff, consultants)	Working conditions, OHS measures including EPRP and security measures, Code of Conduct, SEA/SH prevention, grievance mechanisms	Training and induction sessions; written guidance; internal meetings; publication of information
State Statistics Service of Ukraine (central and regional offices)	Project objectives, components, implementation arrangements, E&S compliance	Formal meetings; technical workshops; written correspondence; virtual meetings, printed materials
Other government institutions and data users	Statistical methodologies, data availability, data protection principles	Formal meetings; technical consultations; written communication
Academic and research institutions	Methodological updates, access to anonymised data, data quality	Workshops; consultations; dissemination of reports and methodological notes
Civil society organisations and media	Project overview, transparency measures, data confidentiality	Disclosure through official websites; written materials; responses to inquiries
IT service providers and contractors	Technical requirements, cybersecurity standards, contractual obligations	Procurement documentation; formal meetings; written communication
General public	Project overview, objectives, components, E&S instruments (SEP, ESCP)	Disclosure on the official website of the SSSU and other public platforms
All stakeholders	Grievance mechanism procedures and contact details	Website information; email; phone communication; written submissions

#### 4.4. Reporting back to stakeholders

Stakeholders will be kept informed as the project develops, including reporting on project environmental and social performance and implementation of the stakeholder engagement plan and Grievance Mechanism, and on the project's overall implementation progress.

#### 5. Resources and Responsibilities for implementing stakeholder engagement activities

The Project Implementing Unit (PIU) within the State Statistics Service of Ukraine (SSSU) will have overall responsibility for the implementation of stakeholder engagement activities under the Project, including coordination of information disclosure, consultations, outreach activities, and

management of feedback and grievances. Within the PIU, the Environmental and Social (E&S) Specialist will be responsible for the day-to-day coordination and quality assurance of all stakeholder engagement activities, ensuring compliance with the Environmental and Social Framework (ESF) and the Stakeholder Engagement Plan (SEP). This includes preparing and updating the SEP as needed, overseeing implementation of consultations, ensuring timely disclosure of information, consolidating stakeholder feedback, and monitoring the functioning of the grievance redress mechanism. The E&S Specialist will also prepare periodic reports on stakeholder engagement performance and ensure that all activities are properly documented.

At the regional level, designated Environmental, Social, Health and Safety (ESHS) focal points within SSSU regional offices will support implementation of stakeholder engagement activities on the ground. Their responsibilities will include facilitating local-level consultations, supporting outreach to respondents (including vulnerable groups), assisting in the dissemination of information materials, and ensuring smooth communication between the PIU and local stakeholders. They will also help identify and escalate grievances received at regional level to the central grievance mechanism, and support follow-up actions. Regional ESHS focal points will play a key role in ensuring inclusive participation in household surveys and maintaining consistent engagement with communities across different regions.

### **5.1 Budget**

Using existing institutions and established mechanisms with a proven track record is an effective approach for ensuring timely and efficient implementation of stakeholder engagement activities under the Project. Given the urgency and complexity of the context, the Project will rely, to the extent possible, on the institutional systems of the State Statistics Service of Ukraine (SSSU), including its official communication channels, regional offices, and existing grievance redress mechanisms, which are already operational and trusted by stakeholders and aligned with national legislation and World Bank requirements.

The overall responsibility for Project implementation, including all environmental and social (E&S) aspects and stakeholder engagement activities, will rest with the Project Implementing Unit (PIU) established within the SSSU. The PIU will ensure coordination, oversight, and quality control of all activities under the Stakeholder Engagement Plan (SEP), including information disclosure, consultations, outreach activities, and grievance handling.

The Project will allocate a dedicated and itemized budget for the implementation of the SEP, covering staffing costs, communication and outreach activities, consultation processes, training, and grievance redress mechanisms. In addition, all relevant technical assistance and service contracts financed under the Project will be required to include adequate resources for stakeholder engagement and information disclosure activities in line with the SEP, ensuring that engagement is properly integrated into activity-specific design and implementation. The required resources will be financed from the overall Project budget.

## 6. Grievance Mechanism

The main objective of the Grievance Mechanism (GM) is to receive, register, and resolve complaints and grievances in a timely, effective, and transparent manner, ensuring fair treatment of all stakeholders involved in the Project.

### 6.1. Description of GM

Step	Description of Process	Time Frame	Responsibility
GM implementation structure	The GM operates at the national level under the overall responsibility of the Project Implementing Unit (PIU) within the SSSU. Grievances may also be received through SSSU structural units, including regional statistical offices, survey teams, contact centre staff, and designated Environmental, Social, Health and Safety (ESHS) focal points, which act as first points of contact at local level. All complaints are processed in accordance with the official procedure for handling citizens' appeals in the SSSU..	Continuous	SSSU; PIU; regional ESHS focal points
Grievance uptake – available channels	Grievances may be submitted through the following official channels: (i) designated Project e-mail address; (ii) SSSU hotline/contact centre; (iii) written submissions to central or regional offices; (iv) official web-based communication channels; (v) verbal complaints received during interviews or by call centre staff (recorded and registered). All grievances are subject to mandatory	Continuous	SSSU; PIU; regional ESHS focal points

Step	Description of Process	Time Frame	Responsibility
	registration in the official appeals register.		
Registration, sorting and processing	All grievances are registered on the day of receipt (or within statutory timelines) and entered into the official registry. They are categorized by type (e.g., survey implementation, confidentiality, staff conduct, labour issues, SEA/SH-related issues) and assigned to the relevant responsible unit. ESHS focal points support initial screening of E&S-related complaints and ensure proper escalation to the PIU.	Upon receipt of complaint	SSSU; PIU; regional ESHS focal points
Acknowledgment and follow-up	Acknowledgment of receipt is provided within 2 working days. Complainants are informed about the process, expected timelines, and point of contact. Intermediate updates are provided where necessary, particularly for complex cases.	Within 2 days of receipt	PIU; ESHS focal points

Step	Description of Process	Time Frame	Responsibility
Verification, investigation, action	The PIU coordinates investigation of grievances, involving relevant SSSU units and regional ESHS focal points as needed. Corrective actions are implemented in accordance with Ukrainian legislation and SSSU internal procedures. The Project does not provide financial compensation outside legally established frameworks.	Within 10–15 working days (standard cases); urgent cases handled immediately	PIU; relevant SSSU units; ESHS focal points
Feedback and closure	Final response is provided to the complainant explaining the outcome and any corrective actions taken. Where applicable, complainants are informed of their right to further appeal under national legislation.	Within 30 calendar days maximum (or earlier if resolved)	PIU
Monitoring and reporting	All grievances, resolution status, and response times are recorded in the official registry and summarized in periodic Project reports to the World Bank. ESHS focal points contribute to monitoring by reporting regional-level cases and ensuring follow-up actions are implemented.	Ongoing; reported periodically	PIU; ESHS focal points

### Appeals Process

If a complainant is not satisfied with the response provided under the Project Grievance Mechanism, the complainant has the right to:

- a. request reconsideration of the complaint within the State Statistics Service of Ukraine (SSSU) in accordance with the established internal procedures and applicable legislation of Ukraine;
- b. submit the complaint to a higher administrative authority in accordance with the procedure prescribed by national legislation;
- c. seek protection of their rights and legitimate interests through judicial or other remedies available under the legislation of Ukraine.

The use of the Project Grievance Mechanism does not limit, replace, or prejudice the complainant's right to pursue administrative or judicial remedies in accordance with national law.

### **Confidential and Sensitive Complaints (including SEA/SH)**

The Project ensures the possibility of submitting confidential and, where requested, anonymous complaints, including complaints related to sexual exploitation and abuse or sexual harassment (SEA/SH).

Such complaints shall be handled in a confidential, survivor-centred, and rights-based manner, in accordance with the Environmental and Social Framework of the World Bank and the applicable legislation of Ukraine.

Appropriate measures shall be taken to ensure data protection, restricted access to information, and referral to relevant support services, as applicable. No action shall be undertaken without the informed consent of the survivor, except where otherwise required by law.

### **Labor Grievance Mechanism**

A separate Labor Grievance Mechanism (Labor GM) is established for Project workers in accordance with Environmental and Social Standard 2 (ESS2) and the labour legislation of Ukraine.

The Labor GM provides a formal channel for submission and resolution of work-related grievances, including those concerning working conditions, occupational health and safety, and workplace conduct.

All Project workers, including contracted personnel, shall be informed of the availability and procedures of the Labor GM at the time of recruitment and through induction and training activities.

## **Non-Retaliation**

The State Statistics Service of Ukraine and the World Bank maintain a zero-tolerance policy toward any form of reprisal, retaliation, intimidation, or discrimination against individuals who submit complaints, provide feedback, or otherwise engage with the Project's grievance mechanisms.

All grievances shall be handled in a manner that ensures protection of complainants from retaliation and safeguards confidentiality, in accordance with applicable legal and institutional requirements.

## **7. Monitoring and Reporting**

### **7.1 Monitoring of SEP Implementation**

The implementation of this SEP will be monitored by the PIU within the SSSU as part of overall Project monitoring and reporting arrangements.

Monitoring of SEP implementation will focus on the effectiveness and inclusiveness of stakeholder engagement activities and the functioning of the grievance mechanism. Key monitoring indicators may include, inter alia:

- number of stakeholder engagement activities conducted (e.g. technical meetings, consultations, briefings);
- number and type of information disclosure actions undertaken (e.g. publication of Project information and E&S documents on official websites);
- number of grievances received, categorized by type, and percentage resolved within the agreed timeframe; GRM logbook will be developed and will be included in general project progress report.
- number of SEA/SH-related complaints received and referred in accordance with established procedures (without disclosure of personal data);
- number of trainings conducted for PIU staff, survey teams, and contractors on stakeholder engagement and grievance handling.

Given the technical nature of the Project, stakeholder involvement in monitoring activities will primarily occur through feedback provided via consultations, surveys, and the grievance mechanism.

### **7.2. Reporting back to stakeholder groups**

The SEP will be reviewed periodically and updated as necessary during Project implementation to reflect changes in Project activities or stakeholder engagement needs.

Quarterly summaries and internal reports on stakeholder engagement activities, grievances, inquiries, and related incidents, together with the status of implementation of corrective or preventive actions, will be prepared by the PIU and submitted to Project senior management and included, as appropriate, in Project progress reports provided to the World Bank.

These summaries will provide a basis for assessing both the number and nature of grievances and information requests and the Project's capacity to address them in a timely and effective manner. Information on public engagement activities and Project progress may be communicated back to stakeholders through:

- disclosure of updated information on the official website of the State Statistics Service of Ukraine;
- written communications and reports shared with institutional stakeholders;

- direct communication with survey respondents during data collection activities.

**Annexes**

These can include:

- Records of meetings or consultations (see table 1)
- Visual summaries such as stakeholder mapping or stakeholder diagrams
- Grievance submission form, etc.

				-	-

**Endnotes**

---

<sup>1</sup> For the purposes of effective and tailored engagement, stakeholders of the proposed project(s) can be divided into the following core categories:

- **Affected Parties:** Persons, groups, and other entities within the Project Area of Influence (PAI) that are directly influenced (actually or potentially) by the project and/or have been identified as most susceptible to change associated with the project, and who need to be closely engaged in identifying impacts and their significance, as well as in decision-making on mitigation and management measures.
- **Other Interested Parties:** Individuals/groups/entities that may not experience direct impacts from the Project but who consider or perceive their interests as being affected by the project and/or who could affect the project and the process of its implementation in some way.
- **Vulnerable Groups:** Persons who may be disproportionately impacted or further disadvantaged by the project(s) compared with any other groups due to their vulnerable status and that may require special engagement efforts to ensure their equal representation in the consultation and decision-making process associated with the project.
- It is important to note that sometimes projects have different components with very different sets of stakeholders for each component. Those different stakeholders should be considered in preparing the SEP.

---

<sup>2</sup> It is particularly important to understand whether project impacts may disproportionately fall on disadvantaged or vulnerable individuals or groups, who often do not have a voice to express their concerns or understand the impacts of a project, and to ensure that awareness raising and stakeholder engagement be adapted to take into account such groups' or individuals' particular sensitivities, concerns, and cultural sensitivities and to ensure a full understanding of project activities and benefits. Engagement with vulnerable groups and individuals often requires the application of specific measures and assistance aimed at the facilitation of their participation in the project-related decision making so that their awareness of and input into the overall process are commensurate with those of other stakeholders.