

Eastern Ukraine: Reconnect, Recover, Revitalize (3R) Project

Contingency Emergency Response Component Stakeholder Engagement Plan (CERC-SEP)

This Contingency Emergency Response Component Stakeholder Engagement Plan (CERC-SEP) identifies the main project-affected and interested stakeholders of the of the Contingent Emergency Response Component (CERC) of the Eastern Ukraine: Reconnect, Recover, Revitalize (3R) Project (P172348) to support the Government of Ukraine’s response to the Russian Federation’s military offensive. This document describes their interests and engagement needs in relation to the project. The SEP describes the emergency context under which relevant national law and World Bank requirements for stakeholder engagement and information disclosure are to be applied and proposes actionable engagement measures to be undertaken during project implementation. The SEP also describes a Grievance Mechanism designed to facilitate receipt and response to feedback and concerns associated with activities financed under the CERC. The CERC-SEP may be periodically updated during implementation of the CERC to ensure that information is consistent, that methods of engagement remain appropriate and effective, and that any major changes to project activities and schedule are reflected.

Implementation arrangements for the CERC-SEP, including the monitoring of output and outcome results will be the responsibility of the Coordinating Authority, that is, the Ministry for Reintegration of Temporarily Occupied Territories of Ukraine (MRTOT) which maintains the 3R Project Implementation Unit and coordinates delivery of the CERC component with the Ministry of Social Policy (MoSP) which is responsible for administering the social assistance program for IDP, including the provision of cash transfers to the program beneficiaries. Local executive authorities, social welfare units and Administrative Service Delivery Centers perform the beneficiary intake function and receive IDP registrations in person.. The PIU of MRTOT will monitor the CERC-SEP implementation in accordance with the requirements of the World Bank Environmental & Social Framework (ESF) and will ensure the collection of information for regular project reporting. This will include the component output measures on ESF risks and GRM reports described below. The CERC-SEP is to be implemented in conjunction with the project’s Emergency Operations Manual (EOM) which is an annex to the MRTOT Project Operations Manual (MRTOT POM).

Prior consultation for the CERC-SEP and other project-related information will involve placing it in the public domain (e.g. posting on the MRTOT and World Bank websites) prior to activation of the CERC with announcement and opportunity to register comments and suggestions. Since key interested and affected stakeholders are currently living and working under circumstances of extreme volatility associated with the evolving Russian military invasion and continued spread of COVID-19 in Ukraine and around the world face-to-face consultations are not advisable. Alternative means of feedback explored by implementing entities include dissemination of project information and response via e-mail, letters, social media, operating local and national news agencies, radio, and other means. Given the nature of the project activity (provision of cash transfers to bank accounts of registered persons) this means of engagement is considered sufficient.

CERC Summary

Component	Contingent Emergency Response Component (CERC) of the Eastern Ukraine: Reconnect, Recover, Revitalize (3R) Project (P172348)
Amount	USD 99 million
CERC PDO	to improve the living conditions of Internally Displaced Persons (IDPs) by providing them with short term financial assistance to respond to urgent, basic needs.
Activity	<ul style="list-style-type: none"> • Monthly cash transfers to registered Internally Displaced Persons consisting of the provision of targeted assistance to cover living expenses provided in two categories: <ul style="list-style-type: none"> ○ i) UAH 3000/month for persons with disabilities and children; ○ ii) UAH 2000/month for other beneficiaries. <p>The amount of benefit received will not be taken into account while calculating the total family income to enroll in means-tested benefit programs. Thus, the program beneficiaries are eligible to continue to receive other types of benefits or enroll in other types of social assistance programs.</p>
Beneficiaries	<p>To become eligible, applicants must register to obtain an IDP certificate. Registered IDPs apply for the program in person or online. The applications can be submitted through the Diia platform, which uses information from the state registries and geolocation for data verification.</p> <p>For persons displaced during March-April 2022 the following registered IDPs were eligible to receive benefits under the program:</p> <ul style="list-style-type: none"> • persons who have moved from the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol; • persons, who after the imposition of martial law (February 24, 2022, at 5:30 am Kyiv time) were forced to leave their place of residence located in 14 regions with active conflict; and • persons who as of March 1, 2022, were registered as IDPs in 14 war-affected regions and received benefits under the pre-existing (from the 2014 conflict) program - “monthly targeted social assistance to IDPs to cover living expenses, including for housing and utilities”. <p>The 14 eligible war-affected administrative-territorial units are: Chernihiv, Sumy, Kharkiv, Kherson, Mykolaiv, Zaporizhzhia, Donetsk, Luhansk, Kyiv, Zhytomyr, Odesa, Volyn, Dnipropetrovsk oblasts and Kyiv City.</p> <p>Benefits are paid for a full month, regardless of the date of application and the date of termination of martial law. Specifically, transfers to IDPs who applied before April 30, 2022, are provided for two full months (March-April 2022).</p> <p>As of May 11, 2022 around 1 million IDP families received payments with an overall transfer value of UAH 5.8 bn (\$198m).</p> <p>For persons displaced from May 1, 2022 onward cash transfers would only be provided to:</p> <ul style="list-style-type: none"> • IDPs who moved from the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol; • IDPs who moved from territorial communities located in the areas of active hostilities, or those which are temporarily occupied or surrounded (blocked);

	<ul style="list-style-type: none"> Internally displaced persons whose houses were destroyed or damaged so that they are unfit for human habitation and who applied for compensation for loss and (c). <p>These changes to the program design were introduced to channel assistance to the most vulnerable war-affected groups - those who need it most.</p>
Implementing Agency and Partners	<p>Ministry for Reintegration of Temporarily Occupied Territories of Ukraine maintains the 3R Project Implementation Unit, the Coordinating Authority, and coordinates delivery of the CERC component with the Ministry of Social Policy (MoSP) which is responsible for administering the IDP social assistance program and utilizes its Data Processing Centre to process applicant data submitted online by applicants through the Diia e-governance portal or in person to local social welfare units or Administrative Service Delivery Centers which then transfer this data to the MoSP Data Processing Centre.</p>
Project Context	<p>Ukraine is the country deeply affected by an ongoing war with Russia that started with Russian invasion on February 24, 2022, which marked a significant escalation of the armed conflict which had previously been concentrated in the eastern part of the country in early 2014 following Russia’s annexation of the Crimea peninsula. Almost eight years of active fighting in eastern Ukraine (between 2014 and February 2022) led to the internal displacement of over 1.4 million Ukrainians. The war has incited extreme vulnerability and a complex set of political and social grievances that remain a threat to the country’s development in the future. According to the UN, war in Ukraine risks seeing 90 per cent of the country “freefall into poverty” and extreme vulnerability. This activation of the Contingency Emergency Response Component (CERC) will support the immediate needs of more than 1 million people (600,000 families) out of the estimated 8 million people estimated by the UN International Organization for Migration to have been internally displaced since February 24. As of April 5, 1.6 million IDPs had already registered for targeted assistance with authorities in 13 Oblast administrations. The CERC is activated under an existing World Bank Investment Project Financing (IPF) operation, the Eastern Ukraine: Reconnect, Recover, Revitalize (3R) Project (P172348). Undisbursed finances from this operation are reallocated to activities financed under the CERC. These activities differ completely to those planned for financing under the other components of the project.</p>
Environmental risks	<p>The activities supported by the CERC have no adverse environmental risks or impacts. No specific environmental assessments or plans will be required.</p>
Social risks	<p>The activities supported by the CERC are not expected to have any direct adverse social risks or impacts but take place within a highly volatile context beyond the immediate control of the implementing agency. The Project is expected to bring social benefits directly to internally displaced persons and ensure that those with dependents (disabled family members and/or children) receive enhanced assistance. IDPs may be travelling or residing in fragile areas where there is little information available to them about their entitlements to this assistance. The risk of exclusion is highly contextual and beyond the immediate control of the project and not caused by the activities supported by the Bank financing (provision of social assistance to IDPs to cover living expenses in the form of monthly assistance to registered IDPs). Several mitigating factors give confidence in the capacity of the</p>

	<p>operation to address risk of exclusion: (i) the social assistance system is fully functional, reliable, and robust with a systematic response mechanism for receiving and addressing appeals; (ii) it utilizes adaptive mechanisms that can quickly undertake adjustments to the administration and delivery of benefits during the crisis (online enrollment, digital payments, etc.); (iii) the program is widely covered in both traditional media and social media, and (iv) the Diia application sent push notifications about the program to its 17m users (nearly 56 percent of the population aged 15+). Preventative measures able to be actioned by a civil service under emergency conditions will be described in the project's Emergency Operations Manual, in this CERC-SEP and in the design of the activity to be financed. These measures include requirements for eligibility to register (non-combatants, who moved from districts directly impacted by the war), enhanced assistance for those IDPs with dependents, principles for information disclosure and consultation, and grievance redress for the purpose of maintaining transparency in distribution of targeted assistance, and beneficiary feedback survey to be undertaken by designated environmental and social focal points. This CERC-SEP, analyzing affected and interested stakeholder needs and laying out principles for information disclosure and opportunity for feedback and access to redress for complaints and concerns associated with the disbursement of targeted assistance will also be described in the project's Emergency Operations Manual. Further steps of stakeholder engagement activities including establishment of the multi-channel, accessible project Grievance Mechanism are described in the CERC-SEP.</p>
Payment mechanism	<p>The main administrator of the budgetary funds allocated for the social assistance to IDPs is the MoSP. The MoSP submits to the State Treasury of Ukraine a transfer request for social assistance to IDPs to cover living expenses and payment orders to transfer the budgetary funds to the State Savings Bank - Oshchadbank JSC. The funds of the program are transferred to the Oshchadbank - by the 3rd, 13th, and 23rd day of each month based on the registry of IDPs created by the state enterprise "Data Processing Center of the Ministry of Social Policy". The Oshchadbank transfers the funds to the recipients' accounts - no later than within the next business day from the date of receipt of the funds. The payments are deposited into the individual bank accounts indicated by the beneficiaries at the time of application for social assistance to cover living expenses. Records of these payments will be used to document expenses to be reimbursed through the 3R CERC.</p>

Stakeholder Identification and Analysis

Stakeholder group	Interests	Influence	
		Interest	Impact
Project-affected parties			
Internally displaced persons who meet the eligibility criteria by region and were forced to leave their place of residence, whose houses were destroyed or damaged	Receive monthly financial payments in order to sustain their livelihoods; need to understand their entitlements and who to seek advice from in emergency circumstances	H	H

so that they are unfit for human habitation			
Internally displaced persons with children and/or disabled persons	Need to understand their entitlements and that they are eligible for larger payments and who to seek advice from in emergency circumstances	H	H
Unregistered internally displaced persons	Need to be made aware of their entitlements, understand them and how to register to verify their eligibility	H	H
Military and police personnel excluded from receiving payments	Need to be aware that they are not eligible for IDP social assistance benefits and that there are penalties for receipt of funds when they knowingly provide false information to obtain IDP status/certificate	M	M
Other interested parties			
Non-governmental and community-based organizations	Concerned that financing is utilized for correct purposes in transparent manner under emergency circumstances	M	L
National and local media	Disseminating information about international support received during emergency circumstances. May report on misuse of finances.	L	M

Proposed Strategy for Information Disclosure

Stakeholder Group	Project Information Shared	Means of communication/disclosure
Cabinet of Ministers of Ukraine Ministry of Finance; Ministry of Reintegration of Temporarily Occupied Territories; Ministry of Social Policy	<ul style="list-style-type: none"> • Summary project objectives and general information; regular updates on implementation; • CERC Emergency Action Plan and Emergency Operations Manual (which is an annex to the MRTOT Project Operations Manual) • CERC Stakeholder Engagement Plan (CERC-SEP); • Grievance Mechanism (GM) 	<p>Disclosure on official websites, social networks and national media; Government and Public notices. Electronic publications and press releases on the official web sites. Accessibility for persons with disabilities to be incorporated in communications activities.</p> <p>Local executive authorities, social welfare units and Administrative Service Delivery Centers have received information on the program rules, eligibility criteria and penalties for receipt of payment by ineligible recipients as well as application templates used to</p>
Local social welfare units and Administrative Service Delivery Centers		
Internally Displaced Persons and their dependents		

		perform client intake function and communicate this information to beneficiaries.
Non-governmental and community-based organizations, especially groups providing support to IDPs and persons with disabilities		Public notices. Electronic publications and press releases on the project web-site. Public information according to the Law of Ukraine "On access to public information".
National and local media	Summary project objectives and general information	Public notices. Electronic publications and press releases

Proposed Strategy for Consultation and Stakeholder Engagement

Method / Tool	Description/Use	Contents	Dissemination Method	Target Groups
Information Provision				
Publications on official web sites and other official channels in social media	Used to convey information on the Project and regular updates on its progress	Disclosure of official project information and CERC Emergency Action Plan, CERC-SEP, GM submission channels, etc.	Publication of information	All project stakeholders
Distribution of information via public servant's email addresses	Informing of public servants	Information about eligibility and differential entitlements for children and disabled persons	Email	Public servants and other directly affected parties
Consultation and Participation				
Public dissemination of information through social and mass media and provision of contact information and request for feedback response	Project representatives, the affected public, authorities, regulatory bodies and other stakeholders	Summary information on the activity and/or facility in question,	Announcement of public consultation period, targeted Invitations to comment; Public disclosure of Project materials in advance of the CERC implementation. Free access to register comments and suggestions during disclosure period	All stakeholders

Beneficiary feedback survey	Together feedback from beneficiaries regarding issues including accessibility of information, timeliness of benefit delivery, responsiveness to complaints and inquiries, and information on the use of funds	An electronic and/or phone survey	A survey firm would be contracted to prepare the survey instrument, collect data by phone or other electronic means, analyze data and provide a report	Recipients of cash transfers, disaggregated by gender, disability and age, if possible
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Grievance Mechanism

Objective:	To strengthen transparency and accountability to beneficiaries and provide channels for project stakeholders to provide feedback and/or express grievances related to project supported activities.
Aims:	Identification and resolution of issues affecting the project; reduce the risk of the project inadvertently affecting citizens/beneficiaries; obtain feedback and learning to help improve project impact
Activities:	Receive, record, evaluate and address complaints and concerns from project affected parties and citizens at project level and escalate for further response as needed.
Scope:	The GRM managed by MRTOT will be available for project stakeholders (especially project beneficiaries and those directly or indirectly affected, positively or negatively, by the project) and other interested parties to submit questions, comments, suggestions and/or complaints, or provide any form of feedback on all project-funded activities. In addition, the IDP beneficiaries can use the multi-channel GRM operated by the MoSP, which is open for the submission of appeals (applications, complaints, proposals) from beneficiaries of all Government social protection programs. The MoSP maintains an easily accessible GM with functions, staffing, and resources, enabling stakeholders to submit complaints through various channels (phone, email, physical mail, and online). In addition, the Government Hotline “15-45” can be used to submit the complaints related to the provision of social assistance to the MoSP. The Government Hotline “15-47” provides services to victims of trafficking and domestic violence, and the National Hotline 0 800 500 335 provides services to prevent domestic violence and gender equality. There is also a separate 24-hour Hotline 15-39 for counseling and feedback for people with disabilities.

	The Ministry of Digital Transformation, which operates the Diia platform has launched a hotline on cash transfers to the war-affected groups (0 800 331 834). In April the hotline received 77,000 calls.
Management:	The project level GRM is managed by the MRTOT with grievances and complaints received by MoSP and any other relevant ministries and reported to MRTOT for inclusion in overall 3R Project reporting.
Legal basis:	Citizens' appeals, complaints and recommendations procedure is specified in the Law On Citizens' Appeals and amendments to the latter through the 2015 amendment on Electronic Petitions. According to the mentioned law and Constitutional Article 40, the Project proposes the channels described in this CERC-SEP through which all interested parties can make complaints regarding project-funded activities

Grievance Procedure	
Dissemination of GRM	Information included in CERC-SEP and available at the MRTOT website, disseminated in communications with stakeholders.
Channels for submitting complaints	<p><u>By Email:</u> Project's email address: info@minre.gov.ua</p> <p><u>By Phone:</u> +38 (044) 355-14-67</p> <p><u>Through the following web page:</u> https://www.minre.gov.ua/section/skargy-zapyty</p> <p><u>In writing to MRTOT or PIU:</u> Reconnect, Recover and Revitalize Project (3R Project) MRTOT, 03186, m. Kyiv, Chokolivsky Boulevard, 13</p> <p><u>In person:</u> at the above addresses or at the addresses of delegated authority by the latter</p> <p><u>Anonymous complaints:</u> may be submitted without personal details. Anonymous complaints will be investigated but the complaining party must initiate contact with the MRTOT to obtain a response to the complaint investigation.</p> <p><u>Confidentiality will be ensured in all instances,</u> including when the person making the complaint is known.</p>
Receipt	<p>Submit to special dedicated GRM focal point in the MRTOT Project Implementation Unit (PIU)</p> <p>Entered immediately into tracking system for sorting and redirecting to appropriate department/staff responsible for investigating and addressing the complaint</p> <p>The MRTOT Head of PIU is responsible for determining who to direct the complaint to, whether a complain requires an investigation (or not), and the timeframe to respond to it.</p> <p>the MRTOT Head of PIU should ensure that there is no conflict of interest, i.e. all persons involved in the investigation process should not have any material, personal, or professional interest in the outcome and no personal or professional connection with complainants or witnesses.</p>
Recording	<p>Once the investigation process has been established, the person responsible for managing the GRM records and enters this data into the GRM log.</p> <p>The number and type of suggestions and questions should also be recorded and reported so that they can be analyzed to improve project communications.</p>
Investigation	Appeals not requiring additional evaluation – response immediately and no later than 15 days after receipt

	appeals requiring additional evaluation are considered and resolved no later than one month after receipt (<i>Article 20 of the Law of Ukraine on Citizens' Appeals</i>)
Evaluation	<p>the person responsible for investigating the complaint will gather facts in order to generate a clear understanding of the circumstances surrounding the grievance. The investigation/follow-up can include site visits, review of documents and a meeting with those who could resolve the issue.</p> <p>results of investigation and the proposed response to the complainant will be presented for consideration to the Project Coordinator, who will decide on the course of action.</p> <p>Investigation deadline may be extended by 30 working days by the PIU Manager, and the complainant informed about this fact, in the event that:</p> <ul style="list-style-type: none"> a) additional consultations are needed to provide response to the complaint; b) the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.
Handling of SEA/SH complaints	<p>Ensure (i) referral of survivors to support services (health, legal, psychosocial, security and other assistance), based on the consent, needs and wishes of survivors; (ii) linkage to the domestic legal system (based on the consent of survivors unless the reporting to the law enforcement agencies is mandatory in Ukraine). Unlike other types of issues, SEA/SH Grievance Mechanisms do not conduct investigation, make any announcements, or judge the veracity of allegations; and (iii) determination of the likelihood that SEA/SH allegations relate to the Project. If a SEA/SH incident is confirmed, an employer is expected to take a corrective action against the perpetrator. Conclusion on a SEA/SH case is used to assess the overall effectiveness of SEA/SH preventive measures undertaken by the MoF.</p>
Escalation	<p>Appeals that cannot be resolved within one month referred to the MRTOT PIU Manager to define necessary time for its consideration, and report about it to the person who filed the appeal (entire term for resolving issues raised in the appeal may not exceed forty-five days).</p>
Response to complainant	<p>The complainant will be informed about the results of verification via letter or email, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation.</p>
Monitoring and reporting	<p>MRTOT PIU Manager will provide a monthly/quarterly snapshot of GM results, including any suggestions and questions, to the project team and the management, and review the status of complaints to track which are not yet resolved and suggest any needed remedial action.</p>
Progress reports submitted to the World Bank	<p>In the semi-annual project implementation reports submitted to the Bank, MRTOT will provide information on the grievances received derived by MRTOT and from the MoSP standard GRM report on all social assistance programs including:</p> <ul style="list-style-type: none"> • Status of establishment of the GM (procedures, staffing, awareness building, etc.); • Quantitative data on the number of complaints received, the number that were relevant, and the number resolved; • Qualitative data on the type of complaints and answers provided, issues that are unresolved; Number of grievances resolved, rejected or forwarded to other government agencies. •

Referral to World Bank GRS	Communities and individuals who believe that they are adversely affected by a WB supported project may submit complaints to the above project-level GM or the WB's Grievance Redress Service (GRS). The GRS ensures that complaints received are promptly reviewed in order to address project-related concerns. Project affected communities and individuals may submit their complaint to the WB's independent Inspection Panel which determines whether harm occurred, or could occur, as a result of WB non-compliance with its policies and procedures. Complaints may be submitted at any time after concerns have been brought directly to the World Bank's attention, and Bank Management has been given an opportunity to respond. For information on how to submit complaints to the World Bank's corporate Grievance Redress Service (GRS), please visit: http://www.worldbank.org/en/projects-operations/products-and-services/grievance-redress-service .
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Annex: Glossary of Terms

Affected Parties	persons, groups and other entities within the Project Area of Influence (AoI) 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) as 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(s).
Consultation	The process of providing stakeholders with opportunities to express their views on project opportunities, risks, impacts and mitigation measures by gathering information or advice from stakeholders and taking these views into account when making project decisions and/or setting targets and defining strategies.
Disclosure	The provision of information as a basis for consultation with project stakeholders. Involves prior disclosure and dissemination of relevant, transparent, objective, meaningful and easily accessible information in a timeframe that enables meaningful consultations with stakeholders in a culturally appropriate format, in relevant local language(s) and is understandable to stakeholders;
Engagement	A continuous two-way process in which an implementing agency, company or organization builds and maintains constructive and sustainable relationships with stakeholders impacted over the life of a project. This is part of a broader stakeholder engagement strategy, which also encompasses governments, civil society, employees, suppliers, and others with an interest in the Project.
Principles for stakeholder engagement:	Openness and life-cycle approach: public consultations for the project(s) will be arranged during the whole lifecycle, carried out in an open manner, free of external manipulation, interference, coercion or intimidation; Informed participation and feedback: information will be provided to and widely distributed among all stakeholders in an appropriate format; opportunities are provided for communicating stakeholders' feedback, for analyzing and addressing comments and concerns; Inclusiveness and sensitivity: stakeholder identification is undertaken to support better

	<p>communications and build effective relationships. The participation process for the projects(s) is inclusive. All stakeholders at all times encouraged to be involved in the consultation process. Equal access to information is provided to all stakeholders; Sensitivity to stakeholders' needs is the key principle underlying the selection of engagement methods. Special attention is given to vulnerable groups, in particular women, youth, elderly including diverse ethnic groups.</p>
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