

Annex IV.C Stakeholder Engagement Plan

Definitions

CPF	Country Partnership Framework
ECA	Europe & Central Asia
ESF	Environmental and Social Framework
ESS	Environmental and Social Standard
GRM	Grievance Redress Mechanism
HE	Higher Education
HEI	Higher Education Institution
M&E	Monitoring & Evaluation
MOES	Ministry of Education and Science
MOF	Ministry of Finance
NAHEQA	National Agency for Higher Education Quality Assurance
PBCs	Performance-based conditions
PDO	Project Development Objective
PIU	Project Implementation Unit
POM	Project Operational Manual
SEP	Stakeholder Engagement Plan
SEA/SH	Sexual Exploitation and Abuse/Sexual Harassment
TA	Technical Assistance
TOR	Terms of Reference
UCEQA	Ukrainian Center for Education Quality Assessment
WB	World Bank

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1. INTRODUCTION

1.1 Sector Background

The Government of Ukraine is implementing the Project 'Ukraine Improving Higher Education for Results Project' (hereinafter - the Project), which is supported by the International Bank for Reconstruction and Development (hereinafter - IBRD).

In order to harmonize and implement the provisions of the reform in the field of higher education, the Government, through the Ministry of Education and Science (MoES), applied to the World Bank for financial assistance. This project proposal to initiate a joint project with the Bank was submitted by the Ministry of Education and Science to the Ministry of Finance on October 10, 2020 in accordance with the resolution of the Cabinet of Ministers of Ukraine (CMU) of January 27, 2016 № 70 "On the procedure for preparation, implementation, monitoring and completion of projects of economic and social development of Ukraine supported by international financial organizations".

The Project funds strategic investments in accordance with traditional disbursement methods, as well as specific results along the results chain using a results-based approach, involving performance-based conditions (PBC), where payments are made subject to the achievement of the result and the demonstration of compliance expenses. Financing of the Project is supplemented by financing from the state budget, which supports the implementation of higher education reforms. The Project's activities mainly concern public HEIs, while some of the legislative, governmental and financial policies will affect the entire sector, including private HEIs.

Due to the World Bank's Education Report¹ were identified several key challenges in the higher education sector where the Government's reform program could be strengthened, particularly around quality, efficiency, and transparency. This analysis identified opportunities for more efficient and productive use of resources to strengthen the reform agenda. This analysis flagged several key issues in the sector, including improving institutional governance structures and capacity, targeting resource flows, aligning incentives for key stakeholders, and delivering more effective feedback and transparent information.

At the same time the Russian invasion on February 24, 2022, has led to a sudden and severe deterioration of the macroeconomic situation in Ukraine. The ongoing war is also imposing several human costs, causing a growing number of civilian casualties, interrupting livelihoods, and damaging critical infrastructure, including homes, water and sanitation, schools and universities, and health facilities. Large numbers of people have fled to neighboring countries or been internally displaced.

The war has incited extreme vulnerability that may remain a threat to the country's development in the future and necessity to develop a broader range of various channels for the feedback uptake. According to the UN, war in Ukraine risks seeing 90 per cent of the country "freefall into poverty" and extreme vulnerability. Ukraine now faces an unanticipated financing gap driven by the ongoing war. As a response to the fast-evolving emergency and deteriorating fiscal situation, on February 28, 2022, the Government of Ukraine (GoU) requested a project restructuring to provide immediate support to protect the scholarships programs while also adjusting the project design in recognition that some activities (on university mergers) will no longer be viable.

Given the current circumstances in Ukraine, the project has been restructured and an additional component has been added. The restructuring means relocation of loan proceeds from Component 2 and 3 to the new

¹ <https://documents1.worldbank.org/curated/en/790931568661644788/pdf/Overview.pdf>

Component 5 on supporting academic and social scholarships for students. Also, technical Contingency Emergency Response Component (CERC) was created.

This updated Stakeholder Engagement Plan (SEP) reflects the changes in Project composition through identification of new groups of stakeholders, updating of communication program and GRM based on the current situation in Ukraine.

1.2 Project Information

The Ukraine Improving Higher Education for Results Project focuses on improving efficiency, conditions for quality, and transparency in the higher education system of Ukraine. The Project supports the Ministry of Education and Science (MoES) of Ukraine to implement an extensive systemic reform of the higher education sector, while also responding to the emerging needs in the sector driven by the COVID-19 and Russian invasion and ongoing war. The project contributes to outcomes of the current Country Partnership Framework (FY17-21)¹ for Ukraine related to efficient, effective, and inclusive service delivery, as well as better governance, anticorruption, and citizen engagement.

Project Development Objective

The Project Development Objective (PDO) is to improve efficiency, conditions for quality, and transparency in higher education system of Ukraine. To achieve this objective, the operation would be structured in the following components, as described below.

Project Components

Part 1 - Sectoral Improvement in Governance, Financing, Quality, and Transparency

The aim of this part is to support the activities of the Government of Ukraine in implementing and monitoring sectoral reforms that impact governance, financing, quality, and transparency in higher education. This part includes two complementary sub-parts:

Sub-part 1.1: Financing of strategic sector-wide investments to support autonomy, transparency, and monitoring, including, in particular: (a) development of information systems to engage stakeholders, enhance transparency, and ensure informed policy in the higher education sector of the Borrower; (b) development of standardized digital tools for assessing learning outcomes in higher education institutions; and (c) conducting communication campaigns.

Sub-part 1.2: Support for the introduction and use of performance-based incentives in the higher education system of the Borrower.

Part 2 - Consolidation and Partnerships for Enhanced Efficiency and Quality

The aim of this part is to support the Government in improving financial efficiency in the higher education sector and to support the creation of preconditions for university mergers, including the development and implementation of technical and economic justifications for university mergers and partnerships, as well as the development of guiding principles and a "roadmap" for carrying out university mergers and partnerships. This part may also finance merger support packages on a pilot basis following the above measures.

Improving conditions for quality teaching and learning at individual state HEIs that have started the merger process, including: (a) equipping modern basic educational laboratories and advanced research laboratories; (b) equipping information technologies; (c) conducting minor repair and restoration works; and (d) conducting research and necessary technical assistance for planning merger processes.

Sub-part 2.1. Strategic Investments for Successful University Consolidation (\$3 million) Under this sub-part, the Project may finance investment packages as a pilot project for implementation in consolidated (reorganized) HEIs of the following measures related to key priorities in higher education: (i) improving the quality of teaching, learning, and research activities while ensuring digital transformation in the sector; (ii)

implementing national reforms in governance and financial autonomy; and (iii) ensuring successful implementation of consolidation at the institutional and/or program level (i.e., unique to each consolidation). A key aspect of development is that this investment package should facilitate the consolidation process and support quality enhancement measures that would otherwise be unlikely, or that institutions could not implement independently without additional initial funding provided under the Project. The list of pre-defined investment packages for reorganized HEIs will consist of goods and small-scale repair works. They will be selected by the Ministry of Education and Science to facilitate the successful implementation of governance reforms and financial autonomy, as well as to improve quality and relevance. The consolidation support packages will include, in particular, laboratories for teaching, research and/or training, laboratory equipment, learning support tools and other educational facilities, modern digital infrastructure to support distance learning, and small-scale repair works. New construction will not be supported.

Part 3: Capacity Building and Enhancing the Educational Environment and Research Potential of Individual State HEIs including, in particular: a) development of change management plans; b) provision of digital educational resources, digital devices, multimedia equipment, and software, as well as modern digital infrastructure to ensure continuity of learning through remote and distance learning methods; c) provision of modern basic educational laboratories and advanced research laboratories; d) training of management staff to support higher education reforms; e) conducting refurbishment, rehabilitation, reconstruction works; f) providing support to the Ministry of Education and Science and selected state HEIs for strengthening academic innovations, labor market links, strategic planning and change management, engaging entrepreneurs and businesses, human resources management, financial management, and taxation.

The Project will finance pre-defined categories of goods and services, including modern digital infrastructure for distance learning, digital devices, multimedia equipment and software, electronic learning management systems, and similar IT investments to enhance the quality of distance learning. Investments will also include modern basic educational and research laboratories, related equipment, targeted training of management for reform support, refurbishment, rehabilitation, reconstruction works, and targeted assistance, among others, for the development of change management plans, academic innovations, labor market linkage, strategic planning and change management, business and entrepreneur engagement, human resources management, and financial management/taxation.

In line with the amendments of July, 16, 2024 to the Loan Agreement, Parts 2 and 3 of the Project may include refurbishment, rehabilitation, and reconstruction works at selected public higher education institutions, as well as the installation of equipment and implementation of pre-feasibility and feasibility studies. These activities may involve civil works of limited scale, installation of laboratory, digital and energy-related equipment, and technical assessments to support infrastructure modernization, institutional consolidation, and continuity of educational services. Such activities may generate temporary environmental and social risks and impacts, which will be managed in accordance with the Environmental and Social Framework (ESF) and relevant Environmental and Social Standards (ESS).

Part 4 - Project Management, Monitoring, and Evaluation

The purpose of this part is to support the effective management and implementation of the proposed project. As this is a complex and long-term development project, activities within the project require support from a special group of individual consultants, hereinafter referred to as the Project Implementation Unit (PIU). These consultants will enhance the Ministry of Education and Science's capacity for project implementation, providing expertise in project management, procurement, financial, legal management/control, monitoring and evaluation, as well as environmental and social management and safeguards, etc. The PIU will be engaged to support the implementation of the project on a regular basis throughout the project period under the leadership and supervision of the Coordinator/Co-Coordinator.

Part 5 - Support for Academic and Social Scholarships for Students of Higher Education Institutions

This part will support academic scholarships provided by the Ministry of Education and Science, and social scholarships provided by the Ministry of Social Policy of Ukraine. The Ministry of Education and Science administers academic scholarships, according to a well-established legislative and regulatory base, described in Appendix 10 of this Guide. The basic amount of the academic scholarship for students in HEIs averages 2000 UAH per month (approximately \$67 USD) as of 2022. The basic amount of the academic scholarship, appointed by the Government of Ukraine, is the same across different regions and HEIs, although institutions may assign additional awards to students. The number of scholarship recipients is determined based on semester performance, controlled by the Academic Council of the HEI. In 2022, the average annual beneficiaries are approximately 172,000 students enrolled in academic full-time programs. Under Part 5, the Project will reimburse the Ministry of Education and Science for academic scholarships paid during the 2021-2022 academic year, starting from the date of signing the amendments to the Loan Agreement at least until the end of April 2022, for students of professional pre-higher and higher education institutions. The Ministry of Social Policy of Ukraine assigns social scholarships to HEI students from vulnerable segments of the population, as described in Appendix 11 of this Guide. The law defines categories of students eligible for social scholarships, for example, students who are orphans or internally displaced persons, with special educational needs, or from low-income families. These scholarships range from 1180 to 3720 UAH (about \$40 - \$125 USD) depending on the category. The annual number of students receiving social scholarships is about 50,000. Under Component 5, the Project will reimburse social scholarships paid during the 2021-2022 academic year, starting from the date of signing the amendments to the Loan Agreement at least until the end of April 2022, for students of professional pre-higher and higher education institutions.

Part 6 - Emergency Response Component

The Emergency Response Component (CERC), outlined in Appendix 12 of this Guide, aims to support the country's future response in case the current emergency persists, or if a new unexpected emergency arises, following procedures regulated by paragraph 12, Section III of the Bank's Policy on Investment Project Financing (IPF) for projects in situations of urgent assistance needs or limited capacity. There is a possibility that the current emergency situation in Ukraine will continue for some time, requiring further changes in project design to provide urgent interventions. There is also the possibility that a natural disaster, epidemic, or other emergency situation may arise during implementation, causing serious negative economic and/or social consequences. Anticipating such an event, this CERC with zero allocation allows the Government of Ukraine to reallocate project funds to response measures in response to the relevant crisis or emergency.

1.3 Purpose and Objectives of the Stakeholder Engagement Plan

The process of stakeholder engagement pertains to the deliberate involvement and communication with stakeholders, including the identification of vulnerable groups throughout the project's lifecycle. By using a variety of engagement tools, the Project Management System enables: i) information exchange and establishing relationships with project partners and stakeholders; ii) identifying their needs and interests; iii) identifying any risks to the environmental and social context associated with project activities; and iv) outlining current measures aimed at systematically reducing identified risks.

The Ministry of Education and Science (MOES) of Ukraine recognizes the critical importance of effective communication and stakeholder engagement for the successful implementation of the proposed ambitious reform package. Active engagement of stakeholders supports the development of strong, constructive, and effective relationships that are crucial for successful risk management in project implementation. Timely, frequent, and clear communication with stakeholders helps manage mutual expectations and avoid potential conflicts and delays in project execution. To this end, the project will have a strong communication and stakeholder engagement to ensure that all the stakeholders are being informed and consulted both prior and during project implementation.

The purpose of the SEP is to provide a framework for appropriate stakeholder consultation and information disclosure which is appropriate to the context of the country. The goal of the SEP is to facilitate decision making by involving project-affected people and other stakeholders in a timely manner so that these groups are provided enough opportunity to voice their opinions and concerns.

The SEP is a useful tool for managing communications between MOES and its stakeholders. This Stakeholder Engagement Plan (SEP) outlines the process of engaging stakeholders that has been initiated within the project.

The purpose of the Stakeholder Engagement Plan (SEP) is to provide a framework for proper consultation with interested stakeholders and disclosure of project-related information in a manner appropriate to the country context. The aim of the SEP is to facilitate decision-making by involving stakeholders in project implementation through organizing public consultations and implementing an effective mechanism for receiving and addressing grievances.

2. REGULATORY CONTEXT

2.1 National Citizen Engagement Legislation

Ukraine has the following legislation related to citizen/stakeholder engagement which covers both the right to access information and participation in policy development and decision-making:

Access to Information Legislation, Guidelines and Practices

The Constitution of Ukraine guarantees the right to access for information for Ukrainian citizens (article 34, paragraphs 2 and 3). The Laws #2939 'On Access to Public Information', #2657 'On Information', and #183 'About state secret' provide the regulatory framework for access to various types of public information. According to the Law 'On Access to Public Information, information held by public authorities cannot be restricted, unless it is categorized as confidential, secret, or for internal use only. The restrictions must follow the 'three-part test' (tryskladovi test) of public information, as stipulated in Article 6, paragraph 2. The Law mandates public institutions to create structural units or appoint freedom of information officers. The Law assigns the monitoring functions to the Secretariat of the Ukrainian Parliament Commissioner for Human Rights (Ombudsman's Office). The violation of the right to request and obtain information to citizens is punishable by fines while the refusal to provide access for journalists in their work can be punished by a fine, or 3 years' imprisonment (Article 171 of the Criminal Code). On the other hand, the punishment for revealing a state secret can reach up to 5 years' imprisonment.

In the Council of Europe's assessment, the access to information legislation in Ukraine is advanced and well developed. However, some drawbacks still exist which are accounted for primarily by the public servants' lack of knowledge of the legal requirements and how to put them into practice. Another problem is that the responses provided are often of poor quality, incomplete or delayed. Finally, the administrative fees are somewhat high which disincentivize citizens from seeking information.

Ukrainian Citizen Engagement Legislation

The procedures for public for public consultation are described in two government regulations: The first is Regulation # 996 'On the Procedure for Consulting the General Public on Establishing and Implementing the Public Policy which specifies the form and methods for public consultations and distinguishes between direct consultations, such as conferences, meetings, seminars, web conferences, and indirect forms, such as public surveys. The second is Regulation #976 'On the Procedure of Civic Expertise of the Activities of the Executive

Bodies' which mandates public authorities to conduct consultations with the public at the request of NGOs, trade unions, public associations, employers and representatives of local administrative bodies.

Ukraine was taking steps to make public consultations a legally-binding procedure through the proposed draft Law 'On public consultations'. The law was assessed by and positive reviews from the OSCE, but it is not clear at this point whether the law was adopted and/or at what phase in the legislative process it is.

Ukrainian Mechanisms for Complaints

Law #393 'On Citizens' Appeal' 147 defines (Article 3, paragraph 4) and regulates (Articles 1619) the application of complaints mechanisms. Both national and local authorities are obliged to objectively consider citizens' complaints, to compensate citizens for any breach of their rights and to provide justification for any decision taken in the examination of complaints. The violation of the above-mentioned Law leads to the disciplinary, administrative or criminal liability of the public officials. An increasing number of public authorities, regional and city administrations develop online mechanisms for the submission of complaints/grievances by citizens with emerging best practice examples, such as the city of Odessa.

2.2 World Bank Citizen Engagement Requirements

The project is funded by the World Bank - and therefore it will apply the World Bank's Environmental and Social Standards (2018 Environmental and Social Management Standards document) and its 10 standards (ESS) to ensure carrying out due diligence on the application of precautionary measures within the project. In particular, this SEP is prepared in accordance with ESS 10 on stakeholder engagement and disclosure, which recognizes the importance of open and transparent interaction between the Borrower and project stakeholders as an integral element of international best practice. According to ESS 10, the effective involvement of stakeholders can significantly improve the environmental and social sustainability of projects, increase the level of perception of projects by stakeholders, which is a significant contribution to their successful implementation.

Key elements of ESS 10 include the following:

"Stakeholder engagement is most effective when it begins early in the project development process and is an integral part of the preparatory phase.

"The Borrower will engage with stakeholders throughout the life cycle of the project, beginning such engagement as early as possible in the project development process and in a time frame that allows for public consultation with stakeholders. The nature, scope and frequency of stakeholder engagement will be proportionate to the nature and scale of the project and its potential risks and consequences.

Borrowers will engage in public consultations with all stakeholders. Borrowers will provide interested parties with timely, relevant, understandable and accessible information and consult with them in a culturally acceptable manner free from manipulation, interference, coercion, discrimination and intimidation.

In accordance with the detailed information set out in this standard, the stakeholder engagement process includes the following: (i) identification and analysis of stakeholders; (ii) planning how to interact with stakeholders; (iii) disclosure of information; (iv) consultation with interested parties; (v) consideration and response to appeals; and (vi) reporting to stakeholders. As part of the environmental and social impact assessment, the Borrower will ensure that information regarding stakeholder engagement is properly documented, including a description of the stakeholders consulted and a summary of the consultations.

3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES

3.1 Consultations on the Education Reform Prior to this SEP

The introduction of educational reform and the preparation of this Project were preceded by extensive consultations with engaged parties. This process included conducting focus groups with teachers, students, parents, management of higher education institutions and representatives of local authorities. During the consultations, these stakeholders had the opportunity to express their opinions regarding the shortcomings and problems in the existing education system and to propose ways to improve it in the future. After the publication of the initial design of the Project and further consultations of the Ministry of Education and Science, feedback from stakeholders was received. Based on the above, the Ministry of Education and Science created additional working groups for further improvement and inclusion of common sets of issues of concern to stakeholders for their consideration. The topics of the working groups were:

- 1) Ways of creating an effective partnership between teachers, parents and students with a proper balance of rights, duties and responsibilities;
- 2) Autonomy of universities and teachers. Determining the appropriate balance between expected increased autonomy and accountability for results; and
- 3) Fair distribution of funding in the field of education.

3.2 Consultations on Relevant Analytical Work Conducted by the World Bank

Before the implementation of the Project, the World Bank conducted a comprehensive study and analysis of the country's educational sector. As a result of this study, the World Bank issued a report "Research on the field of education in Ukraine", which identified several key challenges in the field, points for growth, especially in terms of the quality of education, increasing the efficiency and transparency of the system. The World Bank team, together with the Ministry of Education and Science, conducted two rounds of consultations (in February and then in May 2019) with stakeholders who shape educational policy (research and teaching staff, NGOs, representatives of higher education institutions and others) regarding the previous versions of the Report. The discussion between the interested parties concerned two areas:

- a) Restoration of public trust in education
- b) Maintaining the pace of reforms in the field of education.

As a result of the discussion, the issue of the cost difference between budgetary and private funding for various educational programs at universities, funding mechanisms for stimulating the unification of higher education institutions and optimizing the network of educational institutions in Ukraine was also raised.

The World Bank team visited and discussed the initial results of the Report with individual HEIs located in Lviv, Zaporizhzhia, and Kharkiv regions.

3.3 Consultations on the Proposed Project Design/Components

As a result of the analysis and dialogue between the MoES and the Bank, the design of the Project was determined to meet the most urgent needs. The MoES will receive additional resources for the development of new standards in the field of higher education as a response to the challenges associated with a decrease in the number of students and will direct resources to those HEIs that are effective in view of the requirements of the labor market and provide quality educational services. The MoES determined that communication with stakeholders and their involvement in the implementation of the Project is a key factor for the successful implementation of all components of the Project.

With regards to gender awareness and inclusion, the project will support both the development of a national university student survey to assess this in qualitative and quantitative terms and as an input and feedback mechanism on the overall university environment and on gender awareness and inclusiveness. This feedback would help to inform university policies and plans related to student enrollment, academic counseling, teaching and other relevant areas.

On October 8, 2019 and February 27, 2020, the World Bank team and the Ministry of Education and Science conducted introductory stakeholder workshops with representatives of the academia, universities, regional authorities and other donors involved in the sector to seek their input and feedback on proposed project components.

Given the limited scale and technical nature of the additional activity, and considering that public consultations had already been conducted in 2021 during Project preparation, no separate round of public consultations was deemed necessary at the time of restructuring.

Relevant stakeholders continue to be informed and engaged through the mechanisms established under the Stakeholder Engagement Plan.

4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

In accordance with ESF guidelines, the list of stakeholders is categorized as follows:

Affected Parties due to the Project

People, social groups and organizations that are directly or indirectly affected by the implementation of the Project: this group includes students of higher education institutions, parents of students, management of higher education institutions, as well as teachers of higher education institutions, who will be beneficiaries of investments, or will be affected by changes in the higher education funding formula and changes related to investments in improving the educational environment. The implementation of refurbishment, rehabilitation, reconstruction works and installation of equipment under Parts 2 and 3 of the Project may affect additional groups of stakeholders. These include contractors and subcontractors engaged in civil works and equipment installation, temporary and construction workers, suppliers of equipment, as well as local communities, neighboring residents, and businesses located in proximity to higher education institutions where works are conducted.

Other Parties

People, social groups and organizations that may have the opportunity to influence and make decisions regarding the implementation of the Project and/or may be interested in the implementation of the Project. This group of stakeholders includes government departments such as the Ministry of Education and Science of Ukraine, the Ministry of Finance of Ukraine, other central executive bodies, international donors, who are also involved in the reform of higher education; national expert centers, NGOs, and trade unions. Other interested parties may include local authorities responsible for urban planning, construction permits, utilities, environmental protection, and public safety, as well as inspection bodies overseeing labor safety, occupational health, and environmental compliance related to refurbishment and reconstruction activities.

Vulnerable and Disadvantaged Groups

Disadvantaged/vulnerable individuals and groups are those who may do not have a voice to express their concerns or understand the impacts of a project, are sometimes excluded from stakeholder engagement. In the context of Ukraine, the following vulnerable groups can be identified: a) displaced persons as a result of Russian invasion in Ukraine; b) families with children with special learning needs; c) poor households with more than two children; d) marginalized ethnic communities, such as Roma; e) orphans and social orphans that live in an institutionalized environment and who may miss on the benefits and services provided by the project.

It is expected that realization of the new Component 5 will also benefit vulnerable groups of students to pay for housing in dormitories, food, and other living expenses during their studies. At the same time, it will partly relieve economic burden on the students as many scholarship recipients rely on parental support during their studies, but the ongoing crisis puts a heavy strain on households' finances and limits parents' ability to provide for their children. Additionally, a certain group of social stipends recipients have lost their parents, and scholarship is often the only income they can rely on.

There are no exclusively vulnerable and disadvantaged groups as such that were excluded or that do not have access to quality education, although there is a deep divide between rural and urban population. In rural areas, most people engaged in agriculture and rural industries for their livelihoods are considered poor. Children in rural locations are disadvantaged due to lack of adequate facilities, poor road connectivity to reach good educational facilities, and lack of proper transport services etc.

The main groups of stakeholders identified so far are listed in the table below. The list can be updated and modified during Project development or implementation. Once the exact geographical area for specific project interventions is determined, the project staff dealing with the communication/stakeholder engagement will keep a registry of various specific stakeholders related to the categories outlined below:

1. HEIs students
2. Parents of HEIs students
3. Vulnerable groups, such as internally displaced students; households with disabled children; poor households with many children, students-orphans and social orphans; students that had to relocate abroad due to security threats
4. Ministry of Education and Science
5. National Agency for Higher Education Quality Assurance
6. State Enterprise 'Scientific-Methodological Center of Higher and Professional Pre-Higher Education'
7. National Qualifications Agency
8. Higher education institutions and their management boards
9. Teaching staff of HEIs
10. Ministry of Finance
11. Local think tanks, policy institutes and NGOs
12. Employers
13. Multilateral and bi-lateral donors involved in the education sector reform
14. Contractors and subcontractors
15. Neighboring communities
16. Local Business

Stakeholder Interest in and Influence over the Project

The table summarizes an information about potential role, level of interest and influence for each of the above-mentioned group of stakeholders.

Stakeholder	Potential Role	Interest	Influence
MOES	It is an institution that ensures the implementation of the Project	High	High
MoF	Provides funding for Project	High	High
HEI	Impacted by the financing formula, beneficiary of investments	High	Medium
NAHEQA	Provide the conditions and methodology for assessing the quality of education and educational services	Medium	Medium
State Enterprise 'Scientific-Methodological Center of Higher and Professional PreHigher Education'	Support for the institutionalization of higher and professional pre-higher education reforms	Medium	Medium
National Qualifications Agency	Responsible for implementation of public policy in the field of qualifications	Medium	Medium
Teaching staff of HEIs	Main beneficiaries of training programs and investments in labs and equipment, affected by financing formula	High	High
Think Tanks	Provide analytic data and policy advice	Medium	Low
International donors	Provide investments in education area	High	Medium
Students	They benefit from investments and improve the quality of educational services. Provision of scholarships	High	Low
Parents	Interested in improvement of education for their children	High	Low
Vulnerable and disadvantaged group based	Since the geographical areas geographical areas where project interventions will be implemented are not clear, social screening will be conducted based on ESMF to identify vulnerable and disadvantaged groups in respective project areas	Medium	Low
Employers	Benefit from improved knowledge and skills of HEIs graduates	High	Medium
Contractors	Responsible for implementation of civil works, supply and installation of equipment; compliance with technical, environmental and social requirements; ensuring OHS standards and timelines	High	High
Neighboring communities	May be affected by project activities at or near HEI premises; provide feedback on potential environmental and social impacts (noise, traffic, waste management, safety); participate in consultations and use the GRM if needed	Medium	Low
Local businesses	May be indirectly affected by project-related activities (temporary access restrictions, noise, service demand); potential service providers or suppliers during project implementation; provide feedback through consultations	Medium	Low

5. STAKEHOLDER ENGAGEMENT PROGRAM

Involvement of interested parties is an inclusive two-way process that must be carried out throughout the entire cycle of the Project's implementation to ensure an opportunity to express their opinion regarding the progress of the Project's implementation, which will be taken into account. The Table shows an approximate set of measures to involve stakeholders that may take place during the Project preparation phase. The Ministry of Education and Science, together with the World Bank team, will continue to work on identifying and prioritizing the involvement of stakeholders during the preparatory phase.

Due to the security situation in the country, any further stakeholder consultation meetings to present and discuss the ESMF, RPF, LMP, and this plan and other project-related documents will be held remotely/virtually. Taking into account the security situation in Ukraine related to the invasion of the Russian Federation, the decision on the format of stakeholder engagement (face-to-face or virtual) will be made separately in each case.

5.1 Stakeholder Engagement Action Plan

Project Part	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Timetable/location/ dates	Responsibilities
All	Stakeholder engagement plan	All	Agreement on/Disclosure of the SEP	Emails, letters to stakeholders with appropriate background information and SEP, placement on the official website of the ministry with indication of channels for feedback	Before the entry into force of the Credit Agreement and in case of changes	Appropriate Ministry of Education and Science staff/PIU/communication officer
All	Project and subproject related GRM system	All	Agreement on/Disclosure of the GRM system	Emails, letters to stakeholders with appropriate background information, placement on the official website of the	During the implementation of the Project	Appropriate Ministry of Education and Science staff/PIU/communication responsible person

				ministry with indication of channels for feedback		
Part 1: Sector-Wide Improvements to Governance, Financing, Quality and Transparency	Expected changes in university governance and funding	University management, rectors, deans, MoF, Council of Rectors of Ukrainian Institutions of Higher Education, student associations	Discuss timing and expectation of the changes in the funding formula to provide the same starting point for all universities; Discuss the selection of HEIs and expected outcomes Clarify that the eligibility criteria for investments based on results and compelling vision for the future	Emails, letters used to provide background information for thought and discussion; dedicated webpage (to be determined) videoconferencing or virtual workshops as needed	During the implementation of the Project	Appropriate Ministry of Education and Science department/PIU director/person responsible for communication
Part 2: Alliances and Partnerships for Improved Efficiency and Quality	ToR for Technical Audit, implementation results of the Technical Audit	Management Of HEIs, MoES	Discuss the objective and content of the activity	Emails, letters used to provide background information for thought and discussion; dedicated webpage (to determined) videoconferencing or virtual workshops as needed	During the implementation of the Project	Appropriate Ministry of Education and Science department/PIU director plus person(s) responsible for communications and stakeholder engagement

<p>Part 2: Alliances and Partnerships for Improved Efficiency and Quality, Part 3: Capacity Building and Education Environment Enhancement</p>	<p>Planned refurbishment, rehabilitation, reconstruction works, installation of equipment, and feasibility studies</p>	<p>HEI management, teaching staff, students, contractors, workers, local communities, neighboring residents, local authorities</p>	<p>Scope and timeline of works; potential environmental and social impacts (noise, dust, access restrictions); occupational and community health and safety measures; grievance redress mechanisms</p>	<p>Disclosure of information via HEI and MoES websites, virtual or in-person consultations where feasible, written notifications, meetings with HEI representatives and contractors</p>	<p>Prior to commencement of works and throughout implementation</p>	<p>MoES, PIU, HEI management, contractors</p>
<p>Part 2: Alliances and Partnerships for Improved Efficiency and Quality, Part 3: Capacity Building and Education Environment Enhancement</p>	<p>Consultations related to ESMP Checklist and other Environmental and Social (ES) documents</p>	<p>Management of HEIs, MoES, PIU</p>	<p>Discuss the objectives, scope, and content of the ESMP Checklist and other relevant ES documents (including ESMF, LMP, SEP); clarify environmental and social requirements, roles and responsibilities, mitigation measures, monitoring arrangements, and reporting obligations</p>	<p>Emails and official letters to provide background information for review and discussion; dedicated webpage (to be determined); videoconferencing meetings or virtual workshops, as needed</p>	<p>During the implementation of the Project</p>	<p>Appropriate Ministry of Education and Science department / PIU Director, with the involvement of persons responsible for environmental and social management, communications, and stakeholder engagement</p>
<p>Part 3: Capacity Building and Education Environment Enhancement</p>	<p>Description of establishment of criteria for HEIs which will be rehabilitated and equipped and broader support, including HEI capacity building</p>	<p>University rectors, deans, professors, student associations</p>	<p>Discuss the criteria of HEI selection, time of the launch, aims of the component</p>	<p>Emails, letters used to provide background information for thought and discussion; dedicated webpage (to be determined) videoconferencing or virtual workshop(s) as needed</p>	<p>During the implementation of the Project</p>	<p>Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement</p>

Improving transparency and stakeholder engagement (under Component 1)	Introduction Of student feedback mechanisms such as National Student Survey the Enhancement Of Unified Electronic Graduate Tracking System	Students, Student Associations, University management, deans, Council of Rectors of Ukrainian Institutions of Higher Education, professors and lecturers	Discuss the objectives of the tools to be introduced; timing; relevance to improvements of the HEI educational process; relevance to governance; and linkages to the labor market	Emails, letters used to provide background information for thought and discussion; dedicated webpage (to be determined) video conferencing or virtual workshop (s) as needed	During the implementation of the Project	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for Communications and stakeholder engagement
Part 4: Project Management, Monitoring & Evaluation Project monitoring Social Scholarships for Higher	Project and sub-projects (appeal mechanism)	Involved auditors, State Audit Service	Clarify roles and responsibilities on project management arrangements	Face-to-face / virtual meetings, official letters, monitoring	During the implementation of the Project	Ministry of Education and Science, World Bank, involved Auditors, representatives of the State Audit Service
Part 5: Support for Academic and Social Scholarships for Students of Higher Education Institutions	GRM established at the level of the	All stakeholders	GRM	Publications on official websites, national media, educational	During the implementation of the Project	MoF, Ministry of Education and Science, HEIs

6. GRIEVANCE REDRESS MECHANISM

6.1 Objective of the GRM Mechanism

Addressing grievances raised by the individual effect of the implementation of World Bank-funded projects is an important component of managing project risks, including cases of gender-based or sexual violence. A GRM can serve as an effective tool for early identification, assessment and resolution of grievances. The GRM serves as an important feedback mechanism that can improve project impact and mitigate undesirable ones. The GRM mechanism will be available to project stakeholders including project-related employees and other parties affected by project-funded activities.

The GRM will also address grievances related to refurbishment, rehabilitation, and reconstruction works, installation of equipment, and feasibility studies financed under the Project. This includes complaints related to environmental impacts, occupational health and safety, community health and safety, access restrictions, disturbance caused by construction activities, and behavior of contractors and workers.

Complaints channel. The following complaint channels will be established at the level of the MoES, through which individuals or legal entities affected by the Project can submit complaints regarding measures financed as part of the implementation of the Project:

By the email address: mon@mon.gov.ua or uiherp@mon.gov.ua

Internet: website of the Ministry of Education and Science of Ukraine

In writing: 10 Beresteyskyi Ave., Kyiv, Ukraine, 01135

The procedure for consideration of appeals, complaints and recommendations of citizens is determined by the Law "On Appeals of Citizens" and its amendments. In accordance with the mentioned Law and Article 40 of the Constitution, there are the following channels through which interested parties can submit complaints regarding activities financed by the project:

By e-mail: informzapyt@mon.gov.ua

In writing to the MoES: 01135, Kyiv, 10 Beresteyskyi Ave.

By e-mail through the website of the Office of the Educational Ombudsman: <https://zvernennya.eo.gov.ua>

Government contact center: <https://ukc.gov.ua/>

In-person: at the specified addresses or at the addresses specified by the delegated bodies

Stakeholders may also submit grievances through the university administration or the dean's office.

Anonymous complaints: can be submitted without personal data.

The Project Coordinator at the MoES immediately forwards the complaint to the employee of the MoES responsible for handling the complaint. The Project Coordinator is responsible for determining who to send the complaint to, whether the complaint requires investigation (or not),

and meeting the deadlines for responding to it. The coordinator must ensure that there is no conflict of interest.

The applicant will be notified of the results of the inspection by letter or e-mail. The answer is based on the materials of the investigation and contain references to national legislation.

The Project Coordinator shall prepare a monthly/quarterly report that includes any suggestions and questions to the Project team and will review the status of complaints to track which are still pending and suggest any corrective actions required

(The report should contain quantitative data on the volume of complaints received; types of complaints and responses. problems that have not been resolved; corrective measures taken, etc.).

Complaints can be submitted anonymously. An anonymously submitted complaint will be considered in the same way as a complaint from an identified individual or legal entity, but without providing an answer to the complainant. The MoES guarantees the confidentiality of the complainant's personal data.

After the selection of sub-projects, the mechanism for submission and consideration of complaints will also be established at the level of HEIs. HEIs will inform local stakeholders about the available channels for submitting complaints at the subproject level during public consultations and by posting relevant information on the official website of HEIs.

Receiving a complaint. The MoES official who receives the complaint completes a complaint registration form (see, for example, SEP), or the complainant can complete the form himself and send it to one of the above addresses. A consultant on environmental and social issues, who is involved in the PIU team, must register a complaint in the Complaints Register. Then the consultant forwards the complaint to the Project Manager, head of the group of consultants. Within five working days, the Project Manager-Head of the Consultant Group will determine which person/department is responsible for handling the complaint, whether it is subject to review or not, and the time frame for its review. The project manager-head of the group of consultants must ensure that there is no conflict of interest during the clarification of the circumstances of the complaint and in the process of its consideration. The duration of consideration of the complaint depends on the issue raised in it. However, all complainants must receive a response about the outcome of their complaint within thirty days.

Consideration. The person/department responsible for handling the complaint will collect and consider all facts related to the content of the complaint. The process may include meetings/virtual consultations with the person who filed the complaint (if they wish to meet) and those who can facilitate a resolution. The complaint is considered within a period of no more than one month from the date of its receipt. If it is not possible to resolve the issues raised in the complaint within a month, the term of its consideration may be extended, but not more than 15 days, which must be notified to the complainant no later than the next day, indicating the additional term of consideration and the reasons.

Once the review is complete, the proposed response will be presented to the Social and Environmental Consultant and the PIU Consultant Group Coordinator the project manager. The consultant must enter the complaint and a description of the measures taken to solve it in the

Register of Complaints.

Answer to the complainant. The applicant will be notified of the outcome of the review by letter, e-mail, or any other possible method similar to how the complaint was received. The answer should be based on the review materials and, if necessary, contain references to national legislation or World Bank standards. If necessary, the environmental and social consultant of the PIU may additionally contact the complainant to make sure whether the complainant is satisfied with the answer provided to him.

Complaints related to sexual exploitation and abuse or sexual harassment. While large-scale construction works are not envisaged, the Project may involve refurbishment, rehabilitation, reconstruction works, and engagement of contractors and temporary workers. These activities may entail risks related to labor influx and interactions with students and local communities. Therefore, complaints related to sexual exploitation and abuse or sexual harassment (SEA/SH) will be addressed through the Project GRM in line with a survivor-centered approach, ensuring confidentiality, safety, and respect for the survivor's wishes. Dedicated personnel within the PIU will be responsible for handling SEA/SH-related grievances and will receive appropriate training.

GRM for employees

ESS 2 requires the establishment of a grievance mechanism for all project workers including direct and contracted workers (and, where relevant, their organizations) to raise workplace concerns. Such workers will be informed about the grievance mechanism upon hiring and about the measures taken to protect them from retaliation for its use. Measures will be taken to ensure easy access to the grievance mechanism for all such project workers; therefore, a separate mechanism will be established for handling their grievances, as outlined in Note 17 to ESS2.

The MoES, with the technical and administrative support of the PIU, will ensure an effective grievance mechanism for workers. The mechanism will be maintained throughout the entire Project implementation period. As the MoES is the legally mandated institution and the contracting authority, it retains full responsibility for receiving, registering, assessing, and monitoring grievances. PIU staff provide support in the day-to-day operation of the mechanism; however, as service providers engaged under civil law contracts, they cannot assume institutional or legal responsibility for the functioning of the GRM.

Information about the existence of the grievance mechanism is easily accessible to all project workers (both direct and contracted) via electronic communication and internal communication channels. Additionally, the grievance mechanism will be described during onboarding and initiation meetings for direct workers.

All contractors are required to have a grievance mechanism for their workers (Contracted Workers) and this will be specified in their contractual agreements.

The grievance mechanism operates based on the following principles:

Grievances will be handled confidentially, assessed impartially, and resolved transparently.

- Submission and processing of grievances will be free of charge for complainants.
- The MoES with support of the PIU will ensure that all project-affected parties have equal opportunities to submit their grievances in an accessible manner. Project participants may use

various communication methods (telephone, email, postal address, etc.). The GRM is available to all project workers.

- The MoES with support of the PIU will allow for anonymous submissions.
- Project Workers may submit grievances at any time during project implementation and during their official engagement period.
- All grievances, whether simple or complex, will be reviewed and resolved as quickly as possible.
- Actions taken in response to a grievance will be timely, decisive, and constructive.

If the complainant is dissatisfied with the outcome of the amicable settlement mechanism, they may appeal according to the procedure set out below. Workers may also resort to court proceedings at any stage of the grievance resolution process.

6.2 Monitoring and Reporting on GRM Implementation

Policies, procedures and regular updates on the GRM system will be made available on the Ministry of Education and Science website. The MOES/PIU will regularly track and monitor the status of complaints to ensure that all grievances are resolved within the established time-frame. The MOES/PIU will also provide regular reports to the World Bank team, that would contain the following information:

Status of establishment of the GRM (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;

Time taken to resolve complaints;

Any issues faced with the procedures of settlement;

Factors that may be affecting the use of the GRM/beneficiary feedback system;

Any corrective measures suggested/adopted.

ANNEX A – GRIEVANCE/INQUIRY FORM

GRIEVANCE/INQUIRY RECORD (Form A)				
<i>Instructions: This form is to be completed by staff receiving the inquiry or grievance and kept in the Project’s file. Attach any supporting documentation/letters as relevant.</i>				
Date Grievance Received:			Name of Staff Completing Form:	
Grievance Received (check ✓):				
<input type="checkbox"/> National <input type="checkbox"/> Oblast <input type="checkbox"/> Rayon <input type="checkbox"/> City/Village <input type="checkbox"/> Amalgamated hromada				
Mode of Filing Inquiry or Grievance (check ✓):				
<input type="checkbox"/> In person <input type="checkbox"/> Telephone <input type="checkbox"/> E-mail <input type="checkbox"/> Phone Text Message <input type="checkbox"/> Website				
<input type="checkbox"/> Grievance/Suggestion box <input type="checkbox"/> Community meeting <input type="checkbox"/> Public consultation <input type="checkbox"/> Other _____				
Name of Person Raising Grievance: <i>(information is optional and always treated as confidential)</i>				
Gender: <input type="checkbox"/> Male <input type="checkbox"/> Female				
Address or contact information for Person Raising Grievance: <i>(information is optional and confidential)</i>				
Location where grievance/problem occurred [write in]				
National:	Oblast:	Rayon:	Village:	Amalgamated hromada
Brief Description of Grievance or Inquiry: <i>(Provide as much detail and facts as possible)</i>				

	Category 1	Social Safeguards
	Category 2	Environmental Safeguards
	Category 3	Grievances regarding violations of policies, guidelines and procedures

	Category 4	Grievances regarding contract violations
	Category 5	Grievances regarding the misuse of funds/lack of transparency, or other financial management concerns
	Category 6	Grievances regarding abuse of power/intervention by project or government officials
	Category 7	Grievances regarding MOES staff performance
	Category 8	Reports of force majeure
	Category 9	Grievance about project interventions
	Category 10	Grievances related to refurbishment, rehabilitation, reconstruction works, or installation of equipment (noise, dust, waste, access limitations)
	Category 11	Occupational health and safety concerns related to Project activities
	Category 12	Community health and safety concerns associated with Project-funded works
	Category 13	Other

Who should handle and follow up on the grievance:
Progress in resolving the grievance (e.g., answered, being resolved, settled):