

Ministry of Education and Science of Ukraine

**Ukraine Improving Higher Education for Results  
Project**

**Stakeholder Engagement Plan (SEP)**

January 2021

DRAFT - Subject to Changes

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## ABBREVIATIONS AND ACRONYMS

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

*Draft*

# 1. INTRODUCTION

## 1.1 Sector Background

Ukraine's higher education sector is undergoing ambitious and challenging reforms in several sub-sectors that can unleash and maximize the human potential of the Ukrainian society and translate it into higher economic growth and welfare. Important new laws have been passed in recent years that set the framework for modernization in several sub-sectors, including the Law on Higher Education in 2014, the Law on Research and Scientific Activity in 2015, and the Law on Education in 2017. At the same time, the COVID-19 pandemic has significantly affected teaching and learning in Ukrainian universities, and the switch to online and distance modalities has revealed significant challenges.

- **Higher Education Reform**

The 2014 Law on Higher Education supported important reforms which aimed to align the Ukrainian higher education with the Bologna process. It supported the implementation of the three-cycle structure of Higher Education – Junior Bachelor (short cycle), Bachelor – Master – PhD and plus 4th or postdoctoral cycle – Doctor of Science. It encouraged the academic, organizational and financial autonomy of Ukrainian universities (by allowing international grants for research and education to be placed in private bank accounts and not only on the State Treasury). In September 2017, the Ukrainian Parliament passed amendments which increased student participation in university governance, tied financial aid to cost of living increases, improved financial transparency at HEIs, imposed term limits for university presidents and deans, and further promoted academic autonomy. They also restructured public university funding in a way that incentivizes universities to compete for the best students. Further reforms are now underway.

- **The World Bank Support to the Education Reform in Ukraine**

The World Bank has been an important counterpart in advancing the education reforms in Ukraine. The Country Partnership Strategy, under *Focus Area 3: Efficiency and Inclusiveness of Social Service Delivery*, highlights the critical importance of the education sector for both the improvement in the delivery of public services and making markets work. For some time, the assistance focused primarily on providing technical assistance and analytical work to strengthen the capacity for data and evidence-based policy making. The World Bank's recent Education Flagship Report has 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.

## 1.2 Project Information

Based on the analysis from the Education Flagship Report, the World Bank is currently engaged with the Ministry of Education and Science of Ukraine in developing an investment operation to help advance the ongoing reform of the higher education.

- **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**

**Component 1: Sector-Wide Improvements to Governance, Financing, Quality and Transparency.** The objective of this component is to support the Government with implementation and monitoring of sector-wide reforms affecting higher education governance and financing, quality, and transparency, as well as support strategic communications related to both the project and the larger higher education reform. This component contains two mutually reinforcing sub-components: 1.1 which supports strategic sector-wide investments to strengthen system management, planning and monitoring, and 1.2 which reimburses against specific results through performance-based conditions (PBCs).

*Sub-component 1.1 – Strategic sector-wide investments to support autonomy, transparency, and monitoring*

This sub-component would support strategic investments in information systems (including Higher Education Management Information System (HEMIS)), surveys evaluations, standardized tools for learning assessments, and comprehensive communications campaigns and outreach efforts for the ongoing higher education reform. In particular, these strategic investments are needed to support the introduction of autonomy reforms and performance-based incentives for HEIs, and to improve transparency of funding and information flows within the sector. This sub-component will also finance the design, establishment and implementation of a National Student Survey (NSS) and support introduction of digitally enhanced standardized learning assessments for higher education.

*Sub-component 1.2: Strategic results to strengthen performance-based incentives in higher education*

To incentivize policy changes and implementation of key activities, this sub-component will finance critical performance-based conditions (PBCs) related to introduction and implementation of performance-based incentives at the system-level and at institutional levels in the higher education sub-sector. Under the PBCs mentioned below, the project will co-finance results that will lay the foundations for performance-based incentives to improve efficiency, conditions for quality, and transparency in higher education while building on the strategic activities financed under sub-component 1.1. This sub-component will reimburse the Government for results achieved in support of the following specified disbursement-linked indicators (PBCs):

- *PBC 1: Performance-based funding formula for HEIs.* The proposed Project will support the implementation of the Government’s financing and governance reforms in the higher education sector, specifically implementation of a performance-based funding formula for public HEIs that incorporates a stability funding component and a performance-based component.

- *PBC 2: Financial autonomy for HEIs.* The proposed Project will support the Government’s vision for financial autonomy for HEIs by financing actions that enable such autonomy. Two PBCs would be supported under this PBC:
  - PBC 2.1: Financial autonomy for HEIs: package of laws. This will include necessary revisions to the Law on Higher Education and/or related laws to address issues of budgetary institutions and related aspects of financial autonomy for HEIs.
  - PBC 2.2: Financial autonomy: adopting bylaws. This will include development and adoption of bylaws for financial autonomy in HEIs in accordance with existing legislation.
- *PBC 3: Performance-based rector contracts with KPIs signed (scalable).* Within the frame of financial autonomy of higher education, the system of performance-based relationships between the MOES and HEIs shall be introduced. These are to be established in the form of performance agreements (contracts), whose KPIs are negotiated jointly between the MOES and the rector of the HEI.

### ***Component 2: Alliances and Partnerships for Improved Efficiency and Quality***

The objective of this component is to support the Government improve fiscal efficiency in the higher education sector and to support merged HEIs to improve conditions for quality teaching and learning as part of institutional merger processes. This component is also divided into two sub-components:

#### *Sub-component 2.1: Strategic investments to ensure successful university mergers*

Under this sub-component, the Project would finance packages of investments including goods and minor civil works. These would be specified in detail in the POM, but they would be selected by MOES to promote successful implementation of governance and financial autonomy reforms, as well as quality of higher education<sup>1</sup>. In particular, “merger support packages” could include the following: laboratories for teaching, research, and/or learning, equipment for laboratories, learning support facilities, and other learning spaces, modern digital infrastructure and IT to support distance learning, and minor refurbishment/rehabilitation. New construction would not be supported.

#### *Sub-component 2.2 - Strategic results to support consolidation in higher education*

To incentivize policy changes and implementation of key activities, this sub-component will finance a critical disbursement-linked result related to institutional mergers and consolidation of the network of higher education institutions in Ukraine. This component will follow a result-based approach and will co-finance a result under the PBC mentioned below:

- *PBC 4: Number of mergers of public HEIs under MOES (scalable).* This PBC recognizes the significant challenges associated with incentivizing institutional mergers and consolidating the number of state HEIs, despite the widespread recognition that the status quo in Ukraine in terms of the number of HEIs relative to the declining student-age population is unsustainable. This PBC would be achieved on a scalable basis, measured as the number of mergers of state HEIs under MOES.

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<sup>1</sup> HEIs benefiting from the ongoing Higher Education Project financed by the European Investment Bank (EIB) and the Nordic Environment Finance Corporation (NEFCO) would not be subject to mergers.

### ***Component 3 – Capacity Building and Education Environment Enhancement***

The objective of this component is to build capacity and improve the educational environments, academic managers research capacity in HEIs, including with a focus on supporting HEIs to maintain learning continuity and operational resilience via remote and distance modalities. In the short-term, this will support HEIs to adapt to the new operating reality imposed by COVID-19. In the medium-term, this will ultimately improve the overall relevance, quality and external economic efficiency of the HEIs and their graduates in support of innovation and economic development. To build capacity of academic managers in HEIs, this component would also support targeted training for managerial staff in several key areas, including, inter alia, development of change management plans, academic innovation, labor market linkages, strategic planning and change management, entrepreneurship and business engagement, human resource management, and financial management/taxation. This component would also support the establishment of an Operational Sustainability Team within the MOES, staffed by a small number of specialized consultants to facilitate the process of introducing financial, staffing, human resources, and other types of autonomy at the institutional level. This would help to enhance sustainability for long-term implementation of the project.

Additionally under this component, , the project would 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 types of IT investments to improve quality of distance learning modalities. Investments would also include modern basic teaching laboratories and advanced scientific research laboratories, equipment, and minor refurbishment and rehabilitation.

### **Component 4: Project Management, Monitoring & Evaluation**

The objective of this component is to support the effective management and implementation of the proposed project. The component would finance a comprehensive communications campaign and outreach effort for the ongoing higher education reform. Additionally, the component would finance the day-to-day management and monitoring of the proposed project through the establishment and maintenance of a Project Implementation Unit (PIU) or similar, as defined in the Project Operational Manual (POM) at the Ministry of Education and Science (MOES). It would finance salaries for PIU staff/consultants, including fiduciary, environmental and social risk management staff and incremental consultants, training activities, targeted technical assistance, and operating costs, including outreach related to the project and the project-specific Grievance Redress Mechanism (GRM).

## **1.3 Purpose and Objectives of the Stakeholder Engagement Plan**

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. 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.



The main objective of the SEP is the following:

- To understand the stakeholder engagement requirements of the Ukrainian legislation
- To identify key stakeholders that are affected, and/or able to influence the Project and its activities
- To develop a stakeholder's engagement process that that gives stakeholders the opportunity to participate and influence project design and implementation
- To define the information disclosure provisions under the project
- To establish a formal Grievance Redress Mechanism under the project
- To define roles and responsibilities for the implementation of the SEP
- To define the monitoring arrangements to ensure that the SEP remains an effective and up-to-date tool for stakeholder engagement

## 2. REGULATORY CONTEXT

### 2.1 Ukraine 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'<sup>147</sup> defines (Article 3, paragraph 4) and regulates (Articles 16-19) 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**

Stakeholder engagement is not a novel concept. The World Bank staff has always engaged a multitude of stakeholders to ensure effective project preparation, project implementation and project monitoring. The World Bank increasingly recognized the development impact that can be achieved by empowering citizens to participate in the development process and integrating citizen voice in development programs as key enablers to achieving results.

To ensure a more coherent and strategic approach to understanding the environmental and social concerns of groups affected by WB-funded projects, the Board of Executive Directors approved the Environmental and Social Framework (ESF), which went into effect in 2018. The ESF protects people and the environment from potential adverse impacts that could arise from Bank-financed projects and promotes sustainable development. Within the ESF, ten Environmental and Social Standards (ESSs) set out responsibilities for Borrowers. The Standards are designed to help Borrowers manage project risks and impacts as well as improve environmental and social performance, consistent with good international practice and national and international obligations.

While the previous World Bank safeguards instruments provided avenues for some public consultations, under the new ESF, it has become a stand-alone requirement providing broader opportunities to all types of stakeholders and interested parties to get involved in the planning, implementation and monitoring of the Bank investments.

The Environmental and Social Standard on Stakeholder Engagement and Information Disclosure (ESS 10) defines the requirements for stakeholder engagement which are the following:

- Establish a systematic approach to stakeholder engagement that helps Borrowers identify stakeholders and maintain a constructive relationship with them
- Assess stakeholder interest and support for the project and enable stakeholders' views to be considered in project design
- Promote and provide means for effective and inclusive engagement with project-affected parties throughout the project life-cycle
- Ensure that appropriate project information is disclosed to stakeholders in a timely, understandable, accessible and appropriate manner

### **3. SUMMARY OF PREVIOUS STAKEHOLDER ENGAGEMENT ACTIVITIES**

#### **3.1 Consultations on the Education Reform Prior to this SEP**

The introduction of education reforms was preceded by extensive consultations with interested and affected parties. The process included focus groups with teachers, students, parents, university administrators and regional authorities where they had the opportunity to voice their views on the gaps in the existing system and suggest improvements going forward. Having circulated the first draft for consultations and received extensive feedback, the Ministry of Education and Science created additional working groups to further refine and incorporate common sets of issues of concern that emerged after the first round of consultations: 1) how to develop effective partnerships between teachers, parents and students with the appropriate balance of rights, obligations and responsibilities; 2) the university and teacher autonomy and the striking the right balance between expected extensive autonomy and accountability for results; and 3) the equitable distribution of education funding.

The policy development process and the following draft Education Law raised concerns over the right of minorities to learn in their own language. The Ukrainian educational authorities sought the opinion of the Venice Commission and the Council of Europe on the linguistic provisions of the law in line with the Framework Convention for the Protection of National Minorities and the European Charter for Regional or Minority Languages. These two instruments require that decisions that affect national minorities should be taken in consultation with their representatives which is the appropriate way to develop an inclusive education system and society.

#### **3.2 Consultations on Relevant Analytical Work Conducted by the World Bank**

Prior to the project the World Bank carried out a comprehensive research and analysis on the education sector in the country. The World Bank's recent Education Flagship Report has identified several key challenges in the sector where the Government's reform program could be strengthened, particularly around quality, efficiency, and transparency. This analysis aimed to assess the performance of Ukraine's education system in terms of quality and equity of outcomes and identify 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 flows.

The World Bank team jointly with the Ministry of Education and Science conducted two rounds of consultations (in February and then May 2019) with policy development stakeholders (academia, NGOs, university representatives, and others) on the preliminary findings and the final version of Education Sector Review that focused on the equity, effectiveness and efficiency concerns in the education sector. The topics of debates covered broadly two subject areas: a) rebuilding public trust in education and b) keeping the momentum of the reform. Based on the feedback provided during the first round of consultations, several key issues were raised including cost differentials between budget-funded and privately-funded seats across programs in universities; and financing mechanisms to incentivize HEI mergers and network consolidation.

Very importantly, the World Bank team visited and discussed initial findings with selected universities in Lviv, Zaporizhia and Kharkiv oblasts.

### 3.3 Consultations on the Proposed Project Design/Components

Based on the Bank's analytical work and discussions with Ukrainian educational authorities, the proposed project components were identified to address the most pressing current needs where the Ukrainian Ministry of Education and Science would benefit from additional resources and support for evidence-based policy making in higher education to respond to the challenge of declining student numbers and the need to direct resources to those higher education institutions that are both relevant to the labor market requirements and deliver quality education. The Ministry of Education and Science identified strong communication and stakeholder engagement as a critical factor to get the buy-in required for the successful implementation of the project components.

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 counselling, 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.

## 4. STAKEHOLDER IDENTIFICATION AND ANALYSIS

There are several groups of people and social groups who are interested in the Project. In accordance with the World Bank ESF guidelines, the list of stakeholders is categorized as follows:

- **Affected Parties**

People, social groups and organization who will be directly or indirectly affected by the project: This group includes students of higher educational institutions, parents of the students, universities' management boards, university lecturers, and university professors who will benefit from the proposed investments or be affected by the changes in the funding formulae for higher education and associated investments in better learning environments and overall university environments.

- **Other Parties**

People, social groups and organizations who may have a possibility to influence and make decisions on implementation of the project and/or may have an interest in the Project. This group includes governmental entities such as: the Ministry of Education and Science, Ministry of Finance, and other central agencies; multilateral and bilateral donors that are also involved in the educational sector reform in higher education; national think tanks and NGOs; and trade unions.

- **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) internally displaced families with children as a result of the conflict in Eastern 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.

The project is not targeting the vulnerable groups specifically because it focuses more on the systemic transformation of the higher education system. However, it is expected that the introduction of the new educational methodologies and improved learning environments will also benefit the above-mentioned vulnerable groups. At this point in the project design, it is not clear what the exact geographical areas of intervention are going to be. Once these are defined, the MOES/PIU will (i) identify vulnerable and disadvantaged groups in geographical areas of intervention; (ii) engage with them following the approach laid out in this SEP; and (iii) create an enabling environment at university level to ensure that they benefit from all project activities and investments.

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.

Even though the education system in Eastern part of Ukraine has been disturbed due to the conflict and some of the institutions closed, the students in the Government controlled areas are provided with opportunities to get enrolled in education institutions and able to get formal education without much hindrance over the past few years. 17 universities and 11 research institutions have successfully moved out of the conflict zones and operate in other regions of the country.

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 are 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. University students
2. Parents of university students
3. Vulnerable groups, such as internally displaced students and children; households with disabled children; poor households with many children, orphans and social orphans
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 universities
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

- **Summary of Stakeholder Interest in and Influence over the Project**

The table below summarizes the potential role, interests and influence for each of the above-mentioned stakeholders.

<b>Stakeholder</b>	<b>Potential Role of Stakeholder</b>	<b>Interest</b>	<b>Influence</b>
MOES	It is the main driver and implementor of the reform	High	High
MoF	Provides funding for higher education sector	High	High
HEI	Impacted by the financing formula, beneficiary of investments	High	Medium
NAHEQA	Provide the quality assessment framework and methodology	Medium	Medium
State Enterprise 'Scientific-Methodological Center of Higher and Professional Pre-Higher 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 universities	Main beneficiaries of training programs and investments in labs and equipment, affected by financing formula	High	High
Think Tanks	Provide alternative data and policy advice	Medium	Low
Multilateral and bilateral donors	Provide investments in similar areas and need to coordinate to avoid overlap and maximize impact	High	Medium
University students	Benefit from improved education which may affect their life-long earning potential	High	Low
Parents	Interested in ensuring an improved education for their children	High	Low
Vulnerable and disadvantaged group based	Since the 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 university graduates	High	Medium

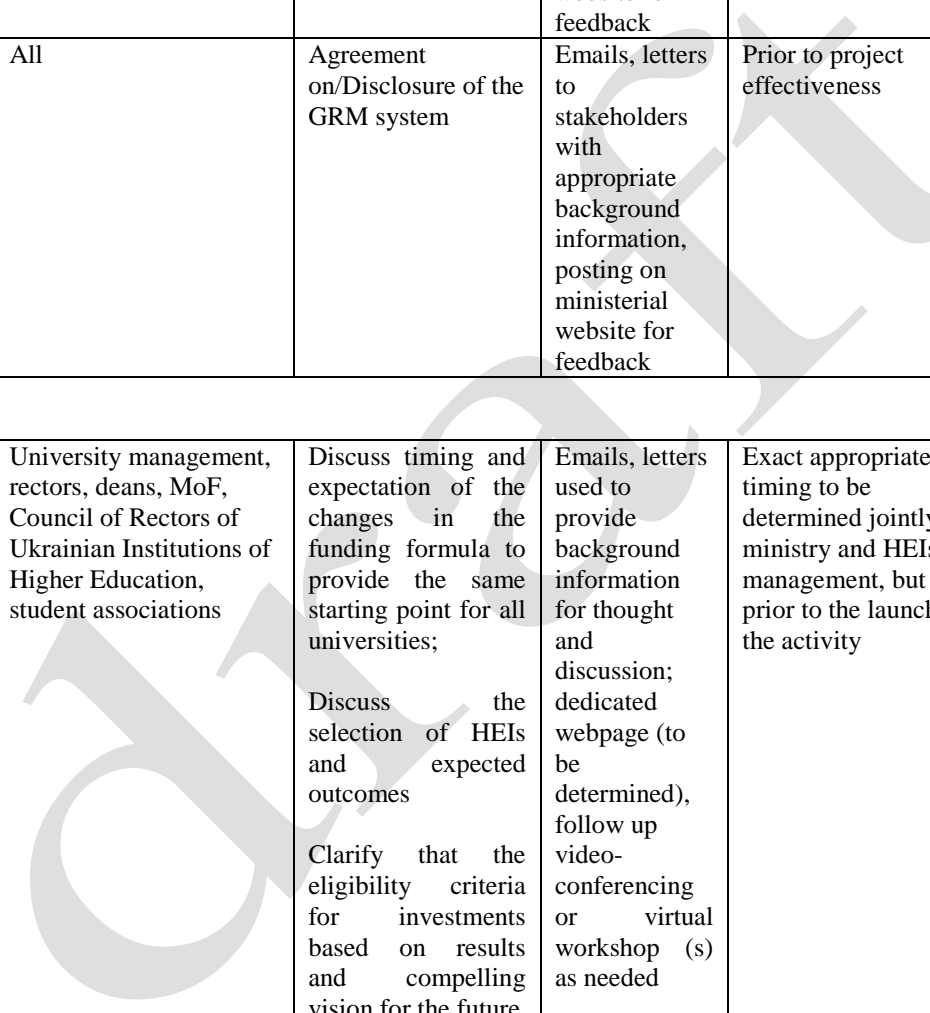
## 5. STAKEHOLDER ENGAGEMENT PROGRAM

Stakeholder engagement is an inclusive two-way iterative process that should be conducted throughout the project life cycle to ensure that the views, concerns and opinions of the project-affected groups are considered. The table presents a comprehensive, but very tentative set of engagement activities that may take place during the project preparation stage through to implementation. The Ministry of Education and Science, jointly with the World Bank team should work further to identify and prioritize the strategic stakeholder engagements to be carried out, particularly during the preparation phase.

Due to worldwide COVID-19 pandemic any follow up public consultation meetings with stakeholders to present and discuss the ESMF and RPF, LMP, ESCP and other project related documents will be conducted remotely / virtually. Given the evolving situation around COVID-19 in Ukraine and around the world, face-to-face consultations, workshops for stakeholder engagement are not advisable. Alternative means of consultations should be explored by implementing entity, following the latest public health guidelines of Ukraine, WHO and World Bank stakeholder’s engagement guidelines closely in order to adjust the format of consultations taking to account some restrictions. In particular, these restrictions will affect Bank requirements for public consultation and stakeholder engagement in projects, both under implementation and preparation. WHO has issued technical guidance in dealing with COVID-19, including: (i) Risk Communication and Community Engagement (RCCE) Action Plan Guidance Preparedness and Response; (ii) Risk Communication and Community engagement (RCCE) readiness and response; (iii) COVID-19 risk communication package for healthcare facilities; (iv) Getting your workplace ready for COVID-19; and (v) a guide to preventing and addressing social stigma associated with COVID-19. These alternative types of stakeholder’s engagement could be but not limited to e-mail, videoconferences, social media, local and national media, radio, and other means. All these documents are available on the WHO website through the following link: <https://www.who.int/emergencies/diseases/novel-coronavirus-2019/technical-guidance>.

### 5.1 Stakeholder Engagement Action Plan (Preparation Phase and/or Prior to the Launch of Individual Activities)

Project component	Topic of Consultation	Target Stakeholders	Issues Raised /Expected Decisions	Methods Used	Time-table/location/dates	Responsibilities
All	Stakeholder engagement and communication and outreach plan	All	Agreement on/Disclosure of the SEP	Emails, letters to stakeholders with appropriate background information	Prior to project effectiveness	Appropriate Ministry of Education and Science staff/PIU/communication officer

				and SEP, posting on ministerial website for feedback		
All	Project-related GRM system	All	Agreement on/Disclosure of the GRM system	Emails, letters to stakeholders with appropriate background information, posting on ministerial website for feedback	Prior to project effectiveness	Appropriate Ministry of Education and Science staff/PIU/communication officer
						
<b>Component 1: Sector-Wide Improvements to Governance, Financing, Quality and Transparency</b>	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), follow up video-conferencing or virtual workshop (s) as needed	Exact appropriate timing to be determined jointly by ministry and HEIs management, but prior to the launch of the activity	Appropriate Ministry of Education and Science department/PIU director plus person(s) responsible for communications and stakeholder engagement
<b>Component 2: Alliances and Partnerships</b>	Description of establishment of criteria for	University rectors, deans, professors, student associations	Discuss the objective and content of the	Emails, letters used to provide	Exact appropriate timing to be determined jointly by	Appropriate Ministry of Education and Science department/PIU director



<b>for Improved Efficiency and Quality</b>	merged HEIs which will be rehabilitated and equipped		activity; eligibility criteria (universities identified in the POM); time of the launch; proposal application process	background information for thought and discussion; dedicated webpage (to be determined) video-conferencing or virtual workshop (s) as needed	ministry and universities, but after initiation of merger	plus person(s) responsible for communications and stakeholder engagement
<b>Component 3 – Capacity Building and Education Environment Enhancement</b>	Description of establishment of criteria for HEIs which will be rehabilitated and equipped and broader support, including HEI capacity building	University rectors, deans, professors, student associations	Discuss the criteria of HEI selection, time of the launch, aims of the component	Emails, letters used to provide background information for thought and discussion; dedicated webpage (to be determined) video-conferencing or virtual workshop(s) as needed	Exact appropriate timing to be determined jointly by ministry and HEIs management, but prior to the launch of the activity	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement
<b>Improving transparency and stakeholder engagement (under Component 1)</b>	Introduction of student feedback mechanisms such as the National Student Survey  Enhancement of Unified	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	Emails, letters used to provide background information for thought and discussion; dedicated	Exact appropriate timing to be determined jointly by ministry and universities, but prior to the launch of the activity	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement

	Electronic Graduate Tracking System		linkages to the labor market	webpage (to be determined) video-conferencing or virtual workshop (s) as needed		
PBCS	PBCs related to implementation of performance-based funding, financial autonomy for HEIs, KPI-based contracts for rectors, and mergers of HEIs	Prime Minister's Office, Ministry of Finance, Parliamentary Budget and Finance Committee, Parliamentary Education Committee, and other project-affected parties	Seek agreement and commitment and political support for the PBCs from the MoF, Prime Minister's Office and Parliament Budget and Finance Committee	Face-to-face / virtual meetings, official letters	Project preparation phase	Ministry of Education and Science, World Bank
<b>Component 4: Project Management, Monitoring &amp; Evaluation</b>						
Project monitoring	Implementation, monitoring, reporting and evaluation arrangements	MoF, Office of the Prime Minister, Parliamentary Committees for Education; Budget and Finance; and other project-affected parties	Clarify roles and responsibilities on project management arrangements	Face-to-face / virtual meetings, official letters	Project preparation phase	Ministry of Education and Science, World Bank

## 5.2 Stakeholder Engagement Action Plan (Implementation Phase after the Launch of Project Activities)

The Ministry of Education and Science and the project team recognize the value of keeping the project stakeholders informed about project progress and implementation challenges throughout the project cycle. The table below presents a proposed stakeholder engagement/reporting plan

during implementation on all aspects of project implementation, including compliance with both the national and World Bank environmental and social requirements. Like the table above, this is just a draft table to be refined after further discussions.

<b>Project component</b>	<b>Topic of Consultation</b>	<b>Target Stakeholders</b>	<b>Topics to discuss /Expected Decisions</b>	<b>Methods Used</b>	<b>Frequency</b>	<b>Responsibilities</b>
All	Stakeholder engagement and communication and outreach plan implementation	All	Present implementation reports, seek feedback from stakeholders on potential improvements	Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-conferences, surveys	Semi-annually	Appropriate Ministry of Education and Science staff/PIU/communication officer
All	Reporting on project-related GRM system implementation	All	Present implementation reports, seek feedback from stakeholders on the functioning of the GRM system	Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-conferences, surveys	Semi-annually	Appropriate Ministry of Education and Science staff/PIU/communication officer
All	Reporting on screening for vulnerable and disadvantaged groups	All	Present results of the screening, seek feedback from those identified groups	Screening checklist to identify any vulnerable or disadvantaged groups (Annex X in ESMF)	Once, the geographic locations are known and then semi-annually	Appropriate Ministry of Education and Science staff/PIU/communication officer
<b>Component 1: Sector-Wide Improvements to Governance, Financing,</b>	Expected changes in university governance and funding	University management, rectors, deans, MoF, Council of Rectors of Ukrainian Institutions of Higher Education, student associations	Present implementation reports, seek feedback from stakeholders on challenges and potential improvements/adjustments	Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-	Semi-annually	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement

<b>Quality and Transparency</b>				conferences, surveys		
<b>Component 2: Alliances and Partnerships for Improved Efficiency and Quality</b>	Description of establishment of criteria for merged HEIs which will be rehabilitated and equipped	University rectors, deans, professors, student associations	Present implementation reports, seek feedback from stakeholders on challenges and potential improvements/adjustments	Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-conferences, surveys	Semi-annually	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement
<b>Component 3 – Capacity Building and Education Environment Enhancement</b>	Description of establishment of criteria for HEIs which will be rehabilitated and equipped and broader support, including HEI capacity building	University rectors, deans, professors, student associations	Discuss the criteria of HEI selection, time of the launch, aims of the component	Emails, letters used to provide background information for thought and discussion; dedicated webpage (to be determined) video-conferencing or virtual workshop(s) as needed	Exact appropriate timing to be determined jointly by ministry and regional authorities, but prior to the launch of the activity	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement
<b>Improving transparency and stakeholder engagement (under Component 1)</b>	Introduction of student feedback mechanisms, such as the National Student Survey  Enhancement of Unified Electronic Graduate Tracking	Students, student Associations, university management, deans, Council of Rectors of Ukrainian Institutions of Higher Education, professors	Present implementation reports, seek feedback from stakeholders on challenges and potential improvements/adjustments	Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-conferences, surveys	Semi-annually	Appropriate Ministry of Education and Science technical department/PIU director plus person(s) responsible for communications and stakeholder engagement)

	System					
<b>PBCs</b>	PBCs related to implementation of performance-based funding, financial autonomy for HEIs, KPI-based contracts for rectors, and mergers of HEIs	Prime Minister's Office, Ministry of Finance, Parliamentary Budget and Finance Committee, Parliamentary Education Committee, and other project-affected parties	Present implementation reports, seek feedback from stakeholders on challenges and potential improvements/adjustments	Face-to-face meetings, official letters	Semi-annually	Ministry of Education and Science and Science, World Bank
<b>Component 4: Project Management, Monitoring &amp; Evaluation</b>						
Project monitoring	Implementation, monitoring, reporting and evaluation arrangements	MoF, Office of the Prime Minister, Parliamentary Committees for Education; Budget and Finance; and other project-affected parties	Present implementation reports, seek feedback from stakeholders on challenges and potential improvements/adjustments	Face-to-face / virtual meetings, official letters, Emails, letters, reports disclosed on ministerial website; implementation progress workshop/video-conferences, surveys	Semi-annually	Ministry of Education and Science, World Bank

### 5.3 Timeline for Provision of Comments and Feedback

The Ministry of Education and Science and the World Bank team will make every effort to provide appropriate background and relevant technical information to stakeholders whose feedback is sought on various project issues with enough advance notice (5-10 business days) so that the stakeholders have enough time to prepare to provide meaningful feedback. The MOES/PIU team will gather written and oral comments, review them and commit to report back to stakeholders on how those comments were incorporated, and if not, provide the rationale for reasons for why there were not within 10 to 30 working days from the stakeholder engagement event.

## 5.4 Proposed Information Disclosure Approach

The table below provides a preliminary summary of the suggested information to be disclosed based on the project design and topics that might be of interest to stakeholders. The table should be finalized following discussions between the World Bank and Ministry of Education and Science project teams.

Project component	List/ Type of information to be disclosed	Methods of disclosure proposed	Timing/Frequency	Target stakeholders	Responsible stakeholders
All	Proposed Project Design; PAD (check the WB requirements for PAD disclosure)	Ministry of Education and Science website; distribution via email to local authorities, universities' websites or information boards	Before project effectiveness	All	Ministry of Education and Science/WB team
All	ESMF documentation that is required for disclosure by the WB, including Stakeholder Engagement Plan and GRM description	Ministry of Education and Science website; distribution via email to local authorities, universities' websites or information boards	Before project effectiveness	All	Ministry of Education and Science/WB team
<b>Component 1: Sector-Wide Improvements to Governance, Financing, Quality and Transparency</b>	Changes in the funding formula	Post on ministerial website; emails/letters with the information or linkages to information; virtual workshops with university administrators	Annually	University management boards, deans, lecturers, student associations	Ministry of Education and Science, PIU, university management

<b>Project component</b>	<b>List/ Type of information to be disclosed</b>	<b>Methods of disclosure proposed</b>	<b>Timing/Frequency</b>	<b>Target stakeholders</b>	<b>Responsible stakeholders</b>
<b>Component 2: Alliances and Partnerships for Improved Efficiency and Quality</b>	Publish the selection criteria for participation and the list of merged universities to benefit from investments	Post on ministerial/university websites; emails/letters with the information or linkages to information; virtual workshops with university administrators	Before the selection of merged HEIs  After selection process completed	University management boards, deans, lecturers, student associations	Ministry of Education and Science, PIU, university management
<b>Component 3 – Capacity Building and Education Environment Enhancement</b>	Criteria of HEIs selection and the aims of this component  Publish list of the selected HEIs  Results of the improved facilities in HEIs	Ministerial and university websites; emails/letters with the information or linkages to information; virtual workshops with university administrators	Before and after the start of HEI selection  After component completion	University management boards, deans, lecturers, student associations  External stakeholders	Ministry of Education and Science, PIU, university management
<b>Improving transparency and stakeholder engagement (under Component 1)</b>	National Student Survey results published  Results of the improved Unified Electronic Graduate Tracking System published		After the completion of the survey  After the completion of the enhanced tracking system	University management boards, deans, lecturers, student associations	Ministry of Education and Science, PIU, university management
<b>PBCs</b>	PBCs related to implementation of performance-based funding, financial autonomy for HEIs, KPI-based contracts for rectors, and mergers of HEIs	Post on ministerial website; emails/letters with the information or linkages to information; virtual workshops with university administrators	After relevant laws and/or regulations are officially adopted	University management boards, deans, lecturers, student associations, local authorities	Ministry of Education and Science, PIU

<b>Project component</b>	<b>List/ Type of information to be disclosed</b>	<b>Methods of disclosure proposed</b>	<b>Timing/Frequency</b>	<b>Target stakeholders</b>	<b>Responsible stakeholders</b>
<b>Component 4: Project Management, Monitoring &amp; Evaluation</b>					
Program Management, Coordination and Monitoring and Evaluation	Project Progress Reports  ESMF, SEP and GRM Monitoring Reports	Post on ministerial website; emails/letters with the information or linkages to information; virtual workshops with university administrators	Semi-annually	All	Ministry of Education and Science, PIU



## 5.5 Roles and Responsibilities and Estimated Budget

The overall responsibility for the implementation of the stakeholder engagement and communication process lies with the Ministry of Education and Science with guidance and support from the World Bank, particularly during the project preparation phase. The Ministry will employ a Project Implementation Unit or similar, as defined in the Project Operational Manual, responsible for project management and coordination of all project activities. Within this unit, the Environmental and Social Specialists as well as the Communications Officer will ensure project compliance with the World Bank ESF Standard on Stakeholder Engagement and Disclosure under the overall guidance of the Project Director.

## 6. GRIEVANCE REDRESS MECHANISM

### 6.1 Objective of the GRM Mechanism

Addressing grievances raised by individual affected by World Bank-funded projects is an important component of managing project risks including SEA/SH risks. A GRM can serve as an effective tool for early identification, assessment and resolution of grievances and therefore for strengthening accountability to beneficiaries. The GRM serves as an important feedback mechanism that can improve project impact and mitigate the undesirable ones. The GRM mechanism will be available to project stakeholders including employees and other affected parties to submit questions, comments, suggestions and/or complaints and provide any form of feedback on all project-funded activities.

#### Grievance Investigation and Resolution Process

- *Channel to Make Complaints*

The Ministry of Education and Science intends to establish the following channels through which citizens/beneficiaries/Project Affected Persons (PAPs) can make complaints/suggestions/compliments regarding project-funded activities:

- a. By Email: [mon@mon.gov.ua](mailto:mon@mon.gov.ua) or alternative email
- b. Internet: Ministry of Education and Science's website
- c. In writing: indicate address /post box where the letters should be sent
- d. Dedicated phone number: toll-free number (to be formulated in writing)
- e. By fax: indicate fax

The grievance could be submitted anonymously. The anonymous grievance should be received and investigated at the same manner that grievance from identified person or organization. The Ministry guarantee the confidential of complainant's personal data.

- *Receipt and Referral*

The person receiving the complaint will complete a grievance form (see Annex 1), or the complainant can fill the form himself/herself and submit it to one of the addresses above. The dedicated ESF/GRM Officer within the Project Implementation Unit (or its equivalent) will register the grievance in the Registry of Grievances and inform the complainant of the timeframe he/she is expected to receive a response. Then the ESF/GRM staff will refer the case to the Project Director.

Within five business days, the Project Director will determine which person/department should be responsible to investigate the complaint, whether the complaint requires an investigation or not and the timeframe to resolve it. The Project Director should ensure that there is no conflict of interest involved for the investigating officer. The length of the investigation process depends on the complexity of the case. However, all complainants should receive feedback on the status of their grievance within ten business days.

- *Investigation*

The person/department responsible for investigating the complaint will collect and review all the facts related to the grievance. The process may include meetings / virtual consultations with the person who filed the grievance (if willing to meet) and those who can facilitate the resolution. The deadline for investigating the complaint may be extended to 30 working days by the corresponding Project Director, and the complainant is to be informed about this fact within 10 working days, whether:

- additional consultations are needed to provide response to the complaint;
- the complaint refers to a complex volume of information and it is necessary to study additional materials for the response.

After the investigation is finalized, the proposed response will be presented to the GRM/ESF Officer and Project Director. The GRM/ESF Officer will record the proposed action in the Registry of Grievances in the section that describes the suggested action (see Annex 1).

- *Response to the Complainant*

The complainant will be informed about the results of verification via letter, email or by post, as received. The response shall be based on the materials of the investigation and, if appropriate, shall contain references to the national legislation. The ESF/GRM officer will seek feedback whether the proposed actions are deemed satisfactory and will record the response in the corresponding section of the grievance form.

- *SEA/SH related grievances*

As the major civil works are not envisaged by the Project, there is no necessity to create separate GM for addressing of SEA/SH related grievances. In case, if such grievances will be received by the Ministry of Education, they will be investigated and addressed in the framework of general GRM procedure. The personal data of complainant will be protected by the implementer and will not be noticed in reports. The focal point for grievance redressing will be specially designated in PIU. This person will attend SEA/SH grievance redress trainings for increasing capacity in PIU related with comprehensive addressing of SEA/SH issues.

- *Right to Appeal*

If the complainant is not satisfied with the response, one more attempt will be made to clarify the rationale for the proposed action by the GRM/ESF staff, Project Director and the investigating person/department and other relevant personnel may be involved in the appeals process. A final decision will be taken following the appeal meeting. If the response remains unsatisfactory to the complainant, he/she/they may resort to raising their grievances outside the project GRM system.

## 6.2 Awareness Building

The information about the Grievance Redress Mechanism will be available at the Ministry of Education and Science website and will be included in the communications conducted with the project stakeholders, beneficiaries, project affected persons through the communications methods and tools that are part of this stakeholder engagement plan and communications plan under the project, including emails, website, workshops, and face-to-face meetings.

The Ministry of Education and Science will notify university management, as well as local authorities (as applicable) of the GRM system and procedures. Specifically, the information will contain the objective of the GRM, the procedure to make a complaint (where, when and how), the investigation process, the timeframe(s) for responding to the complainant, as well as the principle of confidentiality and the right to make anonymous complaints.

## 6.3 Roles and Responsibilities for GRM

The responsibilities for the management of the GRM system include the following and may be updated from time to time in consultation with the ministerial management team and the World Bank task teams. These functions can either be performed by assigned staff, e.g. ESF/GRM Officer or be outsourced to an outside contractor in case the MOES/PIU capacity to handle the workload is exceeded.

- Overall management of the GRM system
- Developing and maintaining awareness-building
- Collection of complaints
- Recording complaints
- Notification to the complainant on the receipt and timeline to review a complaint
- Sorting/categorization of complaints
- Thorough review of the issues, including the causal link between project activities and alleged damage/harm/nuisance
- Decision-making based on such examination
- Processing appeals or continuous communication with complainants with the purpose to resolve issues amicably
- Publishing responses to complaints, unless otherwise is requested by complainants due to privacy or other concerns (see above 4.2)  
Organization and implementation of information materials and awareness campaigns
- Reporting and feedback on GRM results

## 6.4 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 and publish semi-annual reports available to the World Bank team, and all stakeholders 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/staffing or use;
- Factors that may be affecting the use of the GRM/beneficiary feedback system;
- Any corrective measures suggested/adopted.

## 7. REFERENCES

Draft Ukraine Improving Higher Education for Results Project – Project Appraisal Document (PAD)

Ukraine Handbook on Transparency and Citizen Participation, Council of Europe, December 2017

The World Bank Environmental and Social Management Framework, The World Bank, 2017

ESS10 Guidance Notes, The World Bank, 2017

Ukraine Country Partnership Framework for the period FY17-21

Review of the Education Sector in Ukraine: Moving towards Effectiveness, Equity and Efficiency, World Bank, 2019

A guide to WHO's guidance on COVID-19

## 8. ANNEX A – GRIEVANCE/INQUIRY RECORD

<b>GRIEVANCE/INQUIRY RECORD (Form A)</b>				
<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 checked="" type="checkbox"/> ): <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 checked="" type="checkbox"/> ):  <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	Other		
Who should handle and follow up on the grievance:				
Progress in resolving the grievance (e.g. answered, being resolved, settled):				