



The World Bank

GPSA UKRAINE: EMPOWERING CIVIL SOCIETY AND JOURNALISTS IN OVERSIGHT AND PROMOTION OF EFFECTIVE ANTI-CORRUPTION ENVIRONMENT PROJECT

Project Information Document/ Identification/Concept Stage (PID)

Concept Stage | Date Prepared/Updated: 03-Feb-2020 | Report No: PIDC203633



BASIC INFORMATION

A. Basic Project Data

Project ID	Parent Project ID (if any)	Environmental and Social Risk Classification	Project Name
P172392		Moderate	GPSA UKRAINE: EMPOWERING CIVIL SOCIETY AND JOURNALISTS IN OVERSIGHT AND PROMOTION OF EFFECTIVE ANTI-CORRUPTION ENVIRONMENT PROJECT
Region	Country	Date PID Prepared	Estimated Date of Approval
EUROPE AND CENTRAL ASIA	Ukraine	03-Feb-2020	
Financing Instrument	Borrower(s)	Implementing Agency	
Investment Project Financing	Anti-Corruption Action Center (AntAC)	Anti-Corruption Action Center (AntAC)	

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PROJECT FINANCING DATA (US\$, Millions)

SUMMARY

Total Project Cost	0.45
Total Financing	0.45
Financing Gap	0.00

DETAILS

Non-World Bank Group Financing

Trust Funds	0.45
Global Partnership for Social Accountability	0.45



B. Introduction and Context

Country Context

Ukraine is a country in Eastern Europe and the second-largest country in Europe. It has a population of 44.5 million (2018). It has a semi-presidential republican system.

Ukraine has experienced acute political, security, and economic challenges during the past five years. Since the “Maidan” uprising in February 2014, the country has witnessed several momentous events, including the outbreak of conflict in eastern Ukraine and the annexation of Crimea. From 2014 until early 2019, the Government undertook key reforms, including: carrying out significant fiscal consolidation, moving to a flexible exchange rate, reforming energy tariffs and social assistance, enhancing the transparency of public procurement, simplifying business regulations, stabilizing and restructuring the banking sector, moving forward on health and pension reforms, and establishing anti-corruption agencies. At the same time, people became disillusioned by the lack of meaningful progress in some of the very areas that brought them out into the streets in 2014. Lack of trust in public institutions was the most fundamental. Corruption remained endemic—from the financial sector to health care—and powerful oligarchs still dominated and “captured” the economy. Current President Volodymyr Zelenskyy was elected on April 21, 2019, in a runoff election with former President Petro Poroshenko, winning 73 percent of the vote. Immediately after his inauguration, Zelenskyy dissolved the parliament and called for snap elections. On July 21, President Zelenskyy’s Servant of the People Party won the parliamentary elections, yielding 60 percent of the seats in the Rada, and formed a government. The resulting Government, which took office in August 2019, has committed to an ambitious and wide-ranging reform agenda.[1]

Higher consumption helped reduce poverty. Real wages continued to grow in 2019 due to economic growth and continued outward labor migration. As a result, poverty (consumption per capita below 5.5 USD/day in 2011 PPP) declined to 3.5 percent in 2018 from 4.9 percent in 2017 and 6.4 percent in 2016. This follows a doubling of the poverty incidence from 3.5 in 2014 to 7.8 percent in 2015 due to the sharp recession and high inflation in This recent decline in poverty was driven by a rebound in the real sector including real wage growth, though poverty levels remain high compared to historical trends. Due to the contraction of the economy, Ukraine has performed poorly in terms of shared prosperity over the period. The consumption of the bottom 40 percent contracted (0.8 percent), and this decrease was greater than that of the total population by 0.2 percent. Those in the bottom 40 percent have worse labor market outcomes than the rest of the population, are less equipped to find a job, more likely to have constraints such as childcare when looking for jobs, and more likely to live in rural areas, where employment opportunities are more limited. Median income also contracted during the period 2011-2016 by 0.6 percent annually. Inequality as captured by the household survey remains declined up to 2014, when the Gini index reached 24, but then increased back to 25 in 2015 and 2016. Ukraine today is at a crossroads: the economy stabilized in 2016, but economic prospects remain weak, macroeconomic vulnerabilities are significant, and poverty has increased. To advance development prospects and deliver tangible benefits for the population, it will be critical to address long-standing structural bottlenecks on multiple fronts.[2]

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[1] The World Bank in Ukraine: Overview. <https://www.worldbank.org/en/country/ukraine/overview>

[2] Poverty & Equity Brief: Ukraine - Europe & Central Asia, October 2019

Sectoral and Institutional Context

The Systematic Country Diagnostic (SCD) identifies widespread corruption and state capture as fundamental constraints impeding progress in addressing three key challenges in achieving sustainable recovery and shared prosperity: macroeconomic instability, weak private sector productivity, and ineffective service delivery. Ukraine ranks near the bottom on most corruption indicators: for example, it is in the bottom 15th percentile on the World Governance Indicator on Control of Corruption, far below the average for lower-middle-income countries (37th percentile) or for the Europe and Central Asia (ECA) region (64th percentile). In these circumstances, powerful vested interests seriously impede progress in addressing macroeconomic, productivity, and service delivery challenges. Widespread tax evasion and related-party lending undermine macroeconomic stability, a highly concentrated and anti-competitive production structure inhibits productivity growth and job creation, and weakness in the management of public resources and administrative corruption impede efficient and effective public service delivery despite high levels of expenditure (CPF FY17-21).

Ukraine has struggled with state capture since its independence in 1991. Privatized state assets were concentrated in the hands of a few in the early transition years. In addition, commodities were often purchased by insiders at state-regulated prices and sold at full market prices. Underpriced leases of large tracts of agricultural land, budget subsidies, and low-interest bank loans were made available to connected individuals. As a result, several oligarchs emerged who dominate large sectors of the Ukrainian economy, extracting rents, and directly influencing public institutions, including through direct representation in political parties and Parliament. The number of corporate-affiliated members of the Government and Parliament increased from fewer than 30 percent in the 1990s to over 70 percent since 2010. The links between oligarchs and politicians and state officials stand in the way of reforms that could level the playing field and eliminate rents. Vested interests have supported political parties, financed election campaigns, and influenced the decisions of officials in SOEs, courts, and presidential administrations (CPF FY17-21).

State capture has contributed to Ukraine's poor economic performance despite the country's abundance of natural resources, qualified human capital, and a strategic location in the center of Europe. State capture leads to both the direct costs of lost revenues and wasted public expenditures, and the indirect costs of lower productivity and economic growth. Direct losses to the state have exceeded 10 percent of GDP. However, civil society was strengthened considerably as a of the Euromaidan events and is now beginning to challenge this situation (CPF FY17-21).

Ukraine's governance challenges are among the most important impediments to improving growth prospects and unlocking the potential of the private sector. While addressing these challenges require



fundamental institutional change that will take time and yield broad-based improvements only in the long term, progress in specific areas can have important impacts in strengthening transparency and accountability in the short and medium term. Therefore, it is important to continue to push for specific incremental steps in areas where reforms have been initiated, such as effective implementation of anticorruption laws and of the new public financial management reform strategy, as well as the competition policy framework. In other areas that are at an ongoing phase with the recent election in 2019 of the new President and Rada (Parliament), such as justice and public administration reform, it is important to rollout the process. Such improvements in core structures can help strengthen transparency and accountability across the public sector and thereby have a cross-cutting impact on the three other focus areas underscored by the SCD: (1) creating markets and making them work, (2) fiscal and financial sustainability, and (3) efficient, effective and inclusive service delivery. In addition, building on the energy of Ukrainian civil society since Euromaidan has enhanced citizen engagement and can help strengthen accountability while core structures are being built (CPF FY17-21).

The demand to tackle large-scale corruption in Ukraine triggered Euromaidan protests across the country and created high expectations in Ukrainian society and the international community for reforms from the new government. However, it was naïve to expect that old law enforcement agencies would be a leading force in the post-Maidan anti-corruption movement. For this reason, at the beginning of 2014 Ukrainian civil society began to demand radical reforms of law enforcement agencies responsible for curbing corruption. As a result, new anti-corruption agencies were created - the National Anti-Corruption Bureau of Ukraine (NABU), the Specialized Anti-Corruption Prosecutor's Office (SAPO), the National Agency on Corruption Prevention (NACP) and the Assets Recovery and Management Office (ARMO). Since their creation, several CSOs such as the Anti-Corruption Action Center (AntAC) have increased efforts to monitor these agencies' functioning, for instance, NABU's recruitment of its head and its first investigations as well as SAPO's prosecution and bringing to courts.

Based on the first results of NABU's work and analysis of court rulings, it became apparent that ordinary courts and judges were sabotaging prosecution and trial in the most important corruption cases (judges abstained from hearing NABU cases, delayed hearings in those cases for more than a year, in some cases - more than two years etc.). Since existing judges were appointed and difficult to remove, the need for a separate specialized anti-corruption court was the only viable solution in this situation. The newly-created High Anti-Corruption Court (HACC) began its work in September 2019. AntAC has been monitoring closely its hearings, evaluating its effectiveness, impartiality, integrity of judges, while continuing to monitor the performance of other anti-corruption bodies.

The pivotal role played by civil society organizations (CSOs) and citizens demanding change has heightened civic activism and fundamentally altered the way Ukrainians engage in the governance of their country. Euromaidan and subsequent events illustrated the real and potential role of a maturing and better-organized civil society on key reform issues. This evolution is reflected in the growth of parliamentary representation of former members of CSOs, the passing of critical anti-corruption laws, increased activity by investigative



journalists across the country and by citizen monitoring groups working on specific reforms, including health and campaigns/elections (CPF FY17-21).

Despite this progress, challenges remain within civil society and between civil society and the Government. Civil society is composed of a myriad of CSOs—formal and informal, active and inactive. Many lack capacities in such areas as planning, management, and communications skills. In addition, fora for dialogue over sector reforms are still developing, and coordination with the Government is far from effective. CSOs play a key role in changing the mindset of citizens from being passive beneficiaries to being active users of services. However, opportunities for engaging directly with public officials and Rada MPs are limited and efforts to expand these exchanges require continued attention (CPF FY17-21).

The demand to tackle large-scale corruption in Ukraine triggered Euromaidan protests across the country and created high expectations in Ukrainian society and the international community for reforms from the new government. However, it was naïve to expect that the old law enforcement agencies, rotten with corruption, would be a leading force in the post-Maidan anti-corruption movement. For this reason, at the beginning of 2014, led by AntAC experts, Ukrainian civil society began to demand radical reforms of law enforcement agencies responsible for curbing corruption. As a result, new law enforcement anti-corruption agencies were created - the National Anti-Corruption Bureau of Ukraine (NABU), the Specialized Anti-Corruption Prosecutor’s Office (SAPO), as well as other anti-corruption institutions: The National Agency on Corruption Prevention (NACP) and the Assets Recovery and Management Office (ARMO). Since their creation AntAC performed close civil oversight over NABU’s recruitment and its first investigations as well as SAPO’s prosecution and bringing to courts.

Relationship to CPF

The project is fully consistent with the announced priorities of the Government. The Government of Ukraine’s *Medium-Term Action Plan Until 2020 and the Priority Action Plan*, adopted in April 2017, sets a goal of “increasing standards of living and quality of life via sustainable economic development”, and represents the basis for medium-term budget planning, the Government’s annual detailed actions plans. It sets out five strategic priorities, among them: Supremacy of law and combating corruption - to be achieved by supporting effectiveness of anticorruption and cooperation institutes, ensuring equal access to justice and providing efficient protection of ownership rights.

The project is aligned with the Country Partnership Framework (CPF) for Ukraine (FY17-21), and specifically with its Cross-cutting Focus Area: Better Governance, Anticorruption, and Citizen Engagement. The CPF addresses Ukraine’s governance challenges as a cross-cutting issue through a two-pronged strategy. The first prong of the strategy involves providing targeted support for building core institutions and systems that strengthen transparency and accountability across the public sector. This prong concentrates on strengthening select institutions’ capacities where the World Bank has a comparative advantage, including (i)



strengthening public financial management to improve transparency and reduce rent seeking opportunities; and (ii) supporting anticorruption and citizen engagement efforts to improve accountability.

The second prong of the CPF strategy involves advancing reforms in certain focus areas to disempower vested interests. This involves proactively integrating political economy considerations into the design of institutional reforms across the various focus areas. The rise of powerful vested interests has undermined the accountability of the government to citizens. To address this challenge, the WB continues to support implementation and monitoring of the Corruption Prevention Law and related initiatives. Furthermore, enhancing citizen engagement is key to increasing trust, achieving accountability of public officials, and improving performance of service providers. While civil society has played a central role in pushing for change in Ukraine since Euromaidan, it is important to harness its energy and enthusiasm to engage more systematically and effectively on institutional improvements, key reforms, and service delivery.

This project is aligned with WB operations related to anti-corruption efforts in the country. The development objective of the ongoing anticorruption Advisory Services and Analytics (ASA) project in Ukraine is to strengthen the capacity of anti-corruption institutions, civil society and the media to use asset declarations in the prevention and combating of corruption in Ukraine. One of the activities under this ongoing ASA involves improving coordination and collaboration between local and national CSOs and Ukraine’s anticorruption institutions, with NABU and its regional offices. The proposed project will build from and advance the work that has begun under this ASA by improving the capacity of local CSOs and enhancing collaborative accountability between CSOs and anticorruption institutions. In addition, the Bank’s FY19 Policy-Based Guarantee for Ukraine included specific policy actions focused on the creation of the HACC. The proposed project will support the operation of the HACC by providing for improved monitoring and analysis of the HACC’s cases and the integrity of its new judges.

C. Project Development Objective(s)

Proposed Development Objective(s)

The Project Development Objective (PDO) is to improve the implementation of anti-corruption legislation in Ukraine by strengthening the country’s anti-corruption coalition’s capacities to enhance and enforce said legislation through collaborative social accountability processes at the national and sub-national levels.

Key Results

Key results indicators for this project will be:

- Anti-corruption issues and problems identified and followed-up through project-supported collaborative social accountability mechanisms in target municipalities and at the national level, including project-generated recommendations on improvements to anti-corruption legal and policy framework (both legislation and implementation) taken up by target government institutions at the local or national levels



- Capacity of regional journalists and activists enhanced in order to strengthen civil society’s role in the sphere of anti-corruption

D. Preliminary Description

Activities/Components

The project will rely on a collaborative social accountability approach aimed at strengthening the capacities for multi-stakeholder collective action and cooperation in Ukraine’s anti-corruption reform. Lessons learned from both the GPSA and AntAC’s experience were considered in developing the project’s design. The project strategy will consist in deploying resources for supporting integrated and coordinated actions by both civil society groups and state institutions leading the AC agenda. Project activities will engage all three branches of government in project implementation and promote collaborative dialogues to address challenges and solving problems with regards to anti-corruption legislation and its implementation. Likewise, activities will engage both state and civil society stakeholders -including journalists and local civil society and community-based organizations- in capacity building and peer learning at the regional level.

Firstly, a coalition-building approach will be applied to monitoring the performance of anti-corruption bodies (NABU, SAPO, HACC, NACP). The project will produce independent analyses, including the use of international benchmarks and indicators to assess institutional performance, and to compare it against national and international legal frameworks and monitoring mechanisms. Analytical products and institutional status reports will be shared with relevant public sector institutions, particularly with AC bodies and other agencies that might contribute to strengthening these bodies’ standing and role. These products will also be translated into user-friendly formats to be disseminated through various media channels to improve the general public’s understanding of complicated legal processes.

The project will also provide training and mentoring to journalists, CSOs and other relevant stakeholders in monitoring anti-corruption reforms. Capacity enhancement will focus on raising their capacity for public budget analysis, identifying conflicts of interest, researching public registries, thereby preparing them to participate meaningfully in public hearings and other types of events at both the national and local levels. Constructive dialogue with representatives of the authorities to enhance anti-corruption efforts will be sought throughout project implementation through close collaboration with Members of the Parliament, executive branch representatives, including the President’s office, to foster responsiveness and accountability regarding anti-corruption reform.

Led by AntAC -with support from USAID/ENGAGE project “Facilitating the Anti-Corruption Agenda for the New Parliament”, the anti-corruption agenda of the new President and Verkhovna Radant produced thanks to collaborative dialogues between civil society, state institutions, private sector and technical experts. This process included regional discussions of the agenda with local CSOs, experts and journalists as well as with citizens to ensure their voices were considered in proposing national anti-corruption reforms. As a result of

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this process, a set of priorities was identified, which will be implemented within this project activities following a collaborative social accountability approach.

At the local level, project activities will also follow a collaborative social accountability approach by investing in capacity-building of civil society and public sector stakeholders for participatory monitoring of public spending and service delivery. Collaborative social accountability processes will focus on challenges affecting poor and vulnerable groups in target regions. Moreover, project partner Nashi Groshi will mentor local investigative journalists to research and report on corruption cases and for their uptake by public oversight institutions. Activities will aim at strengthening and sustaining a network of regional anti-corruption journalists.

The initial project design draws from the proposal submitted by AntAC to the GPSA fourth global competitive call for proposals, which was evaluated by an independent roster of experts and selected by the GPSA Steering Committee in July 2019. Adaptive development emphasizes the importance of clearly identifying and understanding the nature of the problem being addressed as well as its political economy factors, and taking small, incremental steps and adjustments towards a long-term goal. The project's design makes the presumption that not every facet of the project can be planned, and no implementing partners can accurately forecast at the beginning what will happen.

The GPSA promotes this approach across its project portfolio as it seeks to operationalize adaptive principles, with the measure of success often being the extent to which projects have helped implementers solve problems that they have discerned themselves, using collaborative social accountability mechanisms. By carrying out interventions through a collective identification of clear locally relevant problems, collaborative social accountability mechanisms developed under GPSA grants seek relevance, legitimacy and practicality.

In addition, the project's design has also been enhanced by taking into consideration the GPSA's theory of change, tailored in this case to Ukrainian anti-corruption context. By engaging multiple stakeholders to cooperate in order to better leverage the existing anti-corruption system (programs, policies, chains and decision-making arenas), the project attempts to contribute to addressing problems of lack of collaborative governance and the capacities needed for this. The project combines (i) flexible funding for civil society-led coalitions to work with government to solve problems that local actors have prioritized with (ii) sustained non-financial support to meaningful engagements, including implementation support, capacity building, facilitation, and brokering. The aim is to contribute to improved efforts to combat corruption using collaborative social accountability mechanisms that also tackle obstacles to improving relevant service delivery.

Project Components:

Component 1. Capacity building for collaborative social accountability. The objective of the component are threefold: (1) to strengthen and expand the network of investigative journalists and members of CSOs dedicated to monitoring and reporting on cases of corruption; (2) to improve the monitoring and investigative capacities of local journalists and members of local CSOs to identify cases of potential misuse of



public resources and corruption, to report them following journalism quality standards and to collaborate with experts and local authorities as needed; and (3) to support capacities for collaborative social accountability through regular information exchanges, joint training and actions aimed at promoting cooperation and coordination across stakeholders supporting anti-corruption reforms at the sub-national and national levels, across relevant sectors, including state institutions, civil society, media and private sector.

The main activities will consist of, inter alia:

1. Sustaining and enhancing the network of investigative journalists and activists by producing learning and operational resources, and delivering target capacity-building activities, including, but not limited to:
 - a. support the dissemination of local investigations at the national level and providing mentorship and assistance to the journalists and activists from the network;
 - b. preparing the list of the most common corruption schemes in the regions, which can be used later by any interested journalist, activist or representative of local councils, including creating video lessons for journalists and on information search and verification
2. Creating micro centers of investigative journalism in regions with weak investigative journalism capacities, provide training and mentoring to journalists for researching and reporting on corruption cases.
3. Facilitating networking and other spaces for collaboration across stakeholders from various sectors implementing or supporting anti-corruption reforms at the central (capital city) level and in target regions or municipalities by (i) identifying information, capacity-building, technical assistance and other types of capacity development needs for addressing implementation challenges; (ii) providing resources (financial and human) to address such needs; and (iii) linking national and sub-national level actions to strengthen anti-corruption preventative and investigative strategies

Component 2. Implementing collaborative social accountability mechanisms for improved anti-corruption reforms. This component aims at supporting civil society’s collaborative engagement with pro-reform institutions and leaders, including preventive and investigative bodies at the national and sub-national levels.

The main activities will consist of, inter alia:

1. Conducting independent analyses, observations, preparing technical recommendations and presenting them before relevant state institutions to ensure transparency and accountability, as well as adherence to quality standards with regards to anti-corruption reforms and their implementation, including, but not limited to:
 - a. Adoption of an effective legal and institutional framework for the verification of asset declarations and the relaunch of the NACP and monitoring its implementation
 - b. Leadership recruitment for the Special Anti-corruption Prosecutor’s Office (SAPO)

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- c. Investigation, prosecution and trials of high-profile corruption cases with special emphasis on trial stages by the High Anti-corruption Court. During this activity AntAC will cooperate closely with state authorities engaged in the criminal process and provide them with the necessary expertise and communications support for the fair trial of cases.
- d. Using data from HACC monitoring to submit proposals to HACC for solving challenges and barriers in their work, as well as addressing proposals received from state bodies and journalists (e.g. proposal received on the creation of trial hearings' video archives.)
- e. Monitoring draft laws and by-laws developed by AC institutions and presented in parliament, as well as detecting any provisions that may endanger the effectiveness or independence of AC institutions
- f. Monitoring compliance with the institutional framework for the selection of judges, including the relaunch of the High Qualification Commission of Judges of Ukraine

2. Support the establishment of new or strengthening of existing institutionalized mechanisms for continued collaborative engagement between civil society and state institutions:

- Analyze existing mechanisms for transparent and effective civil society-state engagement on anti-corruption reform and make recommendations to improve them; and
- Make use of the available (or new) mechanisms, such as the Anticorruption Commission and the Commission on Legal Reform's working groups, which will be used by the project team for effective collaboration with the state on anti-corruption and judicial reform, including by presenting proposals on behalf of other CSOs and journalists.

Component 3: Improving knowledge and learning on social accountability in the Ukrainian anti-corruption sector and project management:

The objective of this component is to establish an internal adaptive knowledge and learning process to regularly adjust project implementation based on experience and contextual circumstances, and to generate knowledge and learning for targeted external dissemination amongst key stakeholders that may take up lessons from the project to apply, sustain or scale collaborative social accountability and/or inform substantive decisions.

The main component activities will consist of, inter alia:

1. Setting up the project's monitoring, evaluation and learning (MEL) system, including, but not limited to, contracting an independent evaluator (individual or firm) at the onset of the project. The independent evaluator will conduct the project's evaluation (including baseline, midterm and final evaluation), inform quality bi-annual technical reports as well as provide support to the project team to develop capacities to adaptively manage the project.
2. Conducting regular internal project MEL sessions focused on adjusting the project's social accountability strategy and operations, including, but not limited to, the civil society partnership, and "reality check" discussions.
3. Developing and implementing a plan for disseminating the project's Knowledge and Learning products to key target audiences, with a focus on the uptake of relevant aspects and elements of the



collaborative social accountability process and mechanism (implemented by the project) that may be sustained or scaled up and/or inform substantive decisions.

4. Contributing to the GPSA’s mandate to broker and promote knowledge and learning about collaborative social accountability, the local adaptation of the GPSA’s theory of change and feeding back lessons that may inform practitioners and the GPSA Global Partnership.
5. Preparing and disseminating learning products, tailored at local activists and journalists on finding conflicts of interest in local authorities and addressing them
6. Project Management: support to carry out day to day Project implementation and monitoring, through the provision of consultant services (including audit), Operating Costs, and Training

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Environmental and Social Standards Relevance

E. Relevant Standards

ESS Standards		Relevance
ESS 1	Assessment and Management of Environmental and Social Risks and Impacts	Relevant
ESS 10	Stakeholder Engagement and Information Disclosure	Relevant
ESS 2	Labor and Working Conditions	Relevant
ESS 3	Resource Efficiency and Pollution Prevention and Management	Not Currently Relevant
ESS 4	Community Health and Safety	Not Currently Relevant
ESS 5	Land Acquisition, Restrictions on Land Use and Involuntary Resettlement	Not Currently Relevant
ESS 6	Biodiversity Conservation and Sustainable Management of Living Natural Resources	Not Currently Relevant
ESS 7	Indigenous Peoples/Sub-Saharan African Historically Underserved Traditional Local Communities	Not Currently Relevant
ESS 8	Cultural Heritage	Not Currently Relevant
ESS 9	Financial Intermediaries	Not Currently Relevant

Legal Operational Policies

Safeguard Policies	Triggered	Explanation (Optional)
Projects on International Waterways OP 7.50	No	
Projects in Disputed Areas OP 7.60	No	



Summary of Screening of Environmental and Social Risks and Impacts

The project has political sensitivity in the society. This may result in complication in project implementation due to the resistance on the ground. Comprehensive SEP should be developed to assure that all project activities are communicated to the public openly and in advance. Project LMP will cover project beneficiaries to ensure protection of civil liberties and rights of project beneficiaries.

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