



# WORKING DESPITE THE WAR:

The Reality of CSOs in Frontline Territories



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# LIST OF ABBREVIATIONS

FPV drone	First Person View (FPV) drone
RCC	Relief Coordination Center
USAID	United States Agency for International Development
IDP	internally displaced person
NGO	non-governmental organization
EU	European Union
MSM	mass media
NCEA	National Classification of Economic Activities
LoC	line of contact
ITA	international technical assistance
CSO	civil society organization
LSG	local self-government body
EW	electronic warfare
LLC	limited liability company
TOT	temporarily occupied territories
UCIPR	Ukrainian Center for Independent Political Research
ASSC	administrative services support center
CEB	central executive body

# ABSTRACT

This document presents findings from a study of the challenges faced by civil society organizations operating in frontline territories of Ukraine, specifically in Kharkiv, Sumy, Chernihiv, Donetsk, Luhansk, Zaporizhzhia, Dnipropetrovsk, Mykolaiv, and Kherson oblasts.

The research was conducted through surveys and focus group discussions with representatives of CSOs operating in the specified oblasts.

Based on respondents' answers, the main security, logistical, organizational, communication, financial, and legal constraints affecting CSOs' capacity to operate in conditions of full-scale war have been identified.

Particular attention was paid to the impact of the security situation on logistics and access to communities, the use of transport in CSO operations, office functioning, team mobility, staffing, and strategic planning. The specificities of CSO interactions with authorities, donors, beneficiaries, and other civil society organizations were analyzed, as were difficulties related to financing, reporting, banking services, registration procedures, and the importation of humanitarian aid.

The relevance of the study is driven by the need for a deeper understanding of the operating conditions of the civil society sector in frontline regions, where a combination of security risks, resource constraints, and communication barriers directly affects the effectiveness of aid delivery to the population and the resilience of civil society in the region. Given that frontline oblasts cover a significant portion of Ukraine's territory, ignoring the specific operating conditions of CSOs in these regions is shortsighted and even dangerous.

The findings will be useful to representatives of civil society organizations, state and local government bodies, international donors and partner organizations, as well as experts in the field of civil society development. They enable the systematization of key challenges, their consideration during the drafting of specific policies and support programs, and an improvement in the effectiveness of responses to the needs of CSOs operating in frontline regions.

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This report was prepared within the framework of the Institutional Development Program of the «Phoenix: Power of Communities» project, implemented by the East Europe Foundation with the support of the European Union. The content of the materials is the sole responsibility of UCIPR and does not necessarily reflect the position of the East Europe Foundation and the EU.

# RESEARCH METHODOLOGY

The object of the study is the activity of civil society organizations in the frontline territories of Ukraine.

The study examines the challenges and constraints encountered in CSO activities across the security, logistics, organization, communication, finance, and legal spheres.

The study aims to identify the key challenges faced by civil society organizations operating in the frontline territories of Ukraine. The research is qualitative and based on an analysis of CSO representatives' experiences. The primary data collection method consisted of online surveys using a standardized electronic questionnaire and focus group discussions held with representatives of organizations operating in frontline regions.

The respondents' fields of activity are diverse: over a quarter are engaged in humanitarian activities; in most cases, this is combined with other areas of their work. A significant proportion of organizations are involved in work with IDPs, from providing humanitarian aid to protecting their rights and encouraging their participation in community decision-making. Other areas of respondent activities include human rights, anti-corruption and integrity, advocacy, civil society development, community development and recovery, educational and cultural activities, environmental activism, and youth policy.

The sample included CSOs of varying scales of activity that continue to operate under the conditions of full-scale war. Participants were selected based on the criteria of geographic coverage of activity and the availability of practical experience working in frontline communities.

The online survey, conducted between 7 January and 18 January 2026, involved 36 civil society organizations. The survey was conducted via an online mailing to representatives of civil society organizations whose contact information is contained in the UCIPR database. The database was compiled from CSO representatives who had previously participated in the organization's events, surveys, and research. The geographic coverage spans 8 frontline oblasts – Dnipropetrovsk, Donetsk, Zaporizhzhia, Mykolaiv, Sumy, Kharkiv, Kherson, and Chernihiv – with the highest number of respondents operating in Mykolaiv Oblast (10 CSOs) and the fewest in Dnipropetrovsk Oblast (3 CSOs).

Focus group discussions were held from 10 February to 25 February 2026 and involved 12 participants. They represented CSOs operating in Kherson, Zaporizhzhia, Mykolaiv, Sumy, Chernihiv, Dnipropetrovsk, Donetsk, and Kharkiv oblasts.

For data collection, a standardized electronic questionnaire with multiple-choice and open-ended questions, along with a structured guide covering thematic blocks – security, logistics, organizational capacity, financing, communication, and legal aspects of operations – was used. The analysis of the collected data was conducted using thematic analysis with elements of qualitative content analysis.

At the same time, the study's findings have several limitations and primarily reflect the experiences of the surveyed organizations, highlighting typical problems and challenges.

# Identified Challenges for CSOs

## SECURITY AND LOGISTICS

According to the survey results, most of the problems encountered by respondents fall into the security and logistics categories. The proximity of hostilities is the primary factor destabilizing and complicating organizations' work. Among the problems most frequently mentioned:

- constant artillery and missile strikes threaten the work of the team and force them to switch to remote work or even to suspend the activities;
- team relocation due to the community being occupied;
- prolonged power outages;
- loss and damage to property due to shelling and/or occupation;
- lack of proper conditions for accommodation and access to communications;
- frequent absence of mobile communications and internet access;
- prolonged curfews;
- numerous checkpoints and inability to reach certain community areas due to mined territories or damaged road surfaces.

Respondents describe their work as taking place amid the active use of drones and constant shelling. The security situation is characterized as unstable and rapidly changing, forcing CSOs to regularly revise their operational formats and approaches to support delivery.

### Logistics and access to communities where CSOs operate

Logistics challenges are directly linked to the security situation. The conditions for delivering humanitarian aid to communities have changed significantly – access to many communities has been lost or made impossible due to the deterioration of the security situation. One respondent reported that due to the active use of drones, the distance the team can travel to work in communities has been reduced from 15 to 5 kilometers from the frontline contact area. Before departure, all routes are thoroughly checked and analyzed, and the trip itself is coordinated with the local government and police.

Respondents note that when delivering humanitarian aid to the population in frontline communities, they collaborate with:

- businesses (for example, free delivery of humanitarian aid by Nova Poshta through promotional codes);
- LSG representatives (in some frontline communities, only village starostas can deliver and distribute humanitarian aid);
- partners (other civil society organizations and charitable foundations, international partners);
- local residents (cases were reported where all vehicles not belonging to local residents become targets for enemy FPV drones, so access to certain communities is possible only for local residents);
- volunteers (due to the absence of their own vehicles and the inability to reach frontline communities).

Access to certain settlements is restricted and depends on the current security situation, which can change daily. Trips near the LoC are coordinated with the organization's internal security service (if the organization has one) and the security services of partners. Respondents also reported cases of targeted shelling of humanitarian vehicles, their destruction, and the death of drivers.



*«Regarding freedom of movement, we also previously had the opportunity to travel with aid, including humanitarian aid. We also work with youth, so we used to be able to bring rural youth to our center... But now we cannot bring them from there because FPV drones have been hunting vehicles recently. So we cannot get there. And the restriction on movement in frontline villages is also felt,»*

shared a representative of an organization that relocated to the city of Dnipro.

Some respondents highlight local security peculiarities. In Kherson, for instance, they note that the level of risk depends even on the weather: during rain or fog, movement is relatively safer, while in sunny weather the drone threat intensifies.

Many respondents emphasized that the main threat comes specifically from Russian FPV drones, for which local activists and volunteers are direct attack targets. Many organizations have faced drone attacks on their staff and vehicles. Local public transport also suffers.

## The Importance of Transport for Logistics

Work in communities is often directly linked to the availability of one's own transport – public transport routes do not cover all frontline communities, taxis refuse to travel to such communities, or the cost is beyond the reach of CSO staff. In such cases, CSO representatives resolve the access problem on their own (e.g., by using personal transport or arranging cooperation with volunteers).

At the same time, own transport is available to a small number of organizations, primarily network CSOs operating throughout Ukraine. Respondents have repeatedly emphasized the critical need for their organization to have its own vehicle.

Transport is needed not only by organizations engaged in humanitarian aid, but also by CSOs working in advocacy and public oversight, which require in-person meetings in communities and consultations with the population.

The main reason organizations cite for not having their own vehicle is insufficient funding. Most CSOs providing humanitarian aid were unaware of the legislative possibility of receiving a vehicle as humanitarian aid, but emphasized the importance and necessity of such an initiative.

Respondents also express varying positions regarding the verification process for obtaining transport (in accordance with the requirements of the Law of Ukraine "On Humanitarian Aid"): some plan to undergo such a procedure, some became interested in it during the discussion, while others indicate that they may not meet the established criteria.

Meanwhile, a small proportion of organizations have their own transport, including armored vehicles. However, respondents note that even the available armored transport provides only partial protection (against shrapnel only), while fully protected vehicles are too expensive and inaccessible for most organizations.

Additionally, the need to use passive protection measures, in particular drone detectors, and to restrict the use of active protection measures is raised. The use of additional protection measures, such as

EW equipment, does not receive a unanimous response from respondents. At the same time, some respondents support their use by CSO representatives but note that this is prohibited for the civil society sector.

Among other challenges, respondents mentioned access-related issues, such as damaged road surfaces and mined territories, prolonged curfews, and numerous checkpoint inspections.

## Office Premises and Their Security

Respondents note that they have office premises or other spaces for conducting activities (warehouses for humanitarian aid, hubs for IDPs), but their conditions vary considerably. Most organizations work in rented offices, sometimes in offices in several cities simultaneously.

Renting the necessary premises is possible in most cases through cooperation with local authorities or local businesses. For example, an organization relocated from TOT shared its experience of cooperating with local authorities, who allocated office space for them. Cases of local businesses providing support in arranging workspaces were also mentioned.

At the same time, covering the costs of renting office premises and their repair through donor funds is complicated. Organizations face the challenge that in frontline communities, it is difficult to find premises that meet the project's and donors' requirements, and the budget allocated for rent does not cover additional costs associated with damage from shelling.

Some surveyed organizations lost their offices or were forced to give them up due to shelling. In cases where premises were damaged (broken windows, doors), organizations either searched for new premises or continued working in partially restored ones.

Some organizations, after relocation, formally retain an office in the frontline region but do not actually use it.



*“We have an office, but it is located in the city of Kharkiv, which we are currently not using as members of our organization. We were relocated and all left for safer places back in 2022. Our colleagues are in Lviv, Vinnytsia, Poltava, Kirovohrad, Kyiv, and Sumy oblasts,”*

noted a representative of a relocated organization from Kharkiv.

The security level of offices is assessed differently, from those equipped with protective measures to those considered conditionally safe or failing to meet basic requirements. Sometimes teams are unable to find premises that meet their security and accessibility requirements.

Respondents note that shelter availability depends on the specific premises. Most organizations have shelters – arranged either on their own or with the support of partners. At the same time, basement rooms in buildings are predominantly used as shelters rather than as specially equipped bomb shelters.

Organizations that do not have shelters in their offices use nearby shelters, which may not provide sufficient security. It is also noted that, due to prolonged air raid alerts, it is impossible to maintain a constant presence in shelters, so teams operate in a mixed mode and respond to threats.

According to respondents, offices are equipped with the necessary technology for power outages: generators, power banks, Starlink, and other equipment that enable continued operations. However, respondents say the number of such means is insufficient for full-scale operations.

It is worth noting that some organizations operate under limited conditions and lack a full set of necessary

means. They note that the lack of electricity critically affects their work. At the same time, even with such equipment, work is complicated during prolonged power outages or when mobile communications are unavailable. In some cases, organizations are unable to promptly purchase the necessary equipment due to budget constraints or complex approval procedures. For example, representatives of one CSO shared that, due to bureaucratic procedures for tendering and selecting an appropriate contractor, they were unable to purchase a generator in time during prolonged power and heating outages this winter.

In general, the number of office premises, their provision with technology for power outages, and the availability of shelters directly depend on the size of the organization – the larger the organization in terms of scope of activity and number of employees, the better equipped it is.

## **Organizational Security Policies**

Respondents report that most organizations have undergone, or systematically undergo, training, including first aid, mine safety, and security management.

At the same time, organizations that have not completed relevant courses recognize their necessity, as their activities involve working directly in frontline communities. It is also noted that some teams try to minimize risks by limiting trips to dangerous areas.

Most surveyed organizations have developed security policies and procedures, including restrictions on travel, movement rules, and internal protocols. Others indicate that such policies are absent or in the process of development, which is explained by the difficulty of predicting risks and the constantly changing security situation.

Respondents note that formalized evacuation plans are not available in all organizations. Some organizations have only informal arrangements or prior discussions. At the same time, surveyed CSO representatives report that some of them do not plan to evacuate and will remain in communities despite the security situation. The development of a separate relocation strategy is rare and rather an exception than the rule among CSOs.

## ORGANIZATIONAL ASPECTS

The staffing problem in frontline territories is gradually becoming systemic. Human resources are becoming one of the scarcest commodities, and organizations themselves describe the situation as one in which “human hunger” is only intensifying. Among the main reasons cited are the departure of team members to safer regions of Ukraine or abroad, the conscription of staff, the inability to attract military-age specialists without a reservation mechanism, a shortage of qualified personnel, insufficient funding for staff remuneration, and staff and volunteer burnout.

Often, security challenges become catalysts for such problems. These include evacuating or relocating teams, staff and volunteer shortages, conscription of workers, emotional burnout, disruption of internal processes, coordination difficulties, and the inability to plan long-term.

Respondents report that constant shelling, the advance of the front line, drone attacks, and the general deterioration of the security situation have caused a significant outflow of personnel. A significant portion of teams have left either abroad or to rear regions. For some CSOs, whose activities are not sufficiently specific to allow a full transition to an online format, this meant they could not continue working in their previous mode or maintain activities at all under such conditions. An additional factor was the conscription of male team members, which, in certain cases, further complicated operations or rendered them impossible.

The lack of adequate security measures has also affected teams’ psychological state. Respondents spoke of high levels of stress, constant anxiety, and burnout among both employees and volunteers. This, in turn, affects not only teams’ ability to maintain current work but also their ability to attract new people. Organizations emphasize that, under such conditions, it is increasingly difficult to find experienced, qualified specialists willing to work in frontline or dangerous communities. Even when the need for specialists is evident, it is often impossible to fill these roles due to insufficient funding, which prevents offering remuneration commensurate with market or risk levels.

All this directly affects organizations’ ability to plan their activities. Under conditions of constant danger, financial instability, and staff shortages, long-term planning often becomes almost impossible. Organizations are forced to work in a mode of constant adaptation, responding to situations here and now, and making predominantly short-term decisions.

All respondents noted problems with human capital. Although some teams have maintained operational effectiveness, their numbers have significantly decreased since the beginning of the full-scale invasion, and the staff is replenished primarily by volunteers, who are engaged informally and for specific needs.

People are defined as the greatest and most valuable resource, and the absence of a team is often the main problem.

### **Team Relocation, Remote Work**

The departure of personnel has significantly affected organizations’ ability to continue their work. The number of organizations that continued operations online after relocation is relatively small compared to those that were forced to cease operations. According to respondents, team members who go abroad lose the context of frontline regions.

The majority of CSO representatives surveyed in frontline regions stated they do not plan to relocate their entire team. The primary activities of those organizations related to humanitarian aid provision involve direct work in communities and require physical presence, so they combine online and offline work formats, with part of the team remaining for fieldwork.

There is a practice whereby expert and management staff work remotely, but relocation, even in such cases, has affected the number of employees, with some leaving the team.

There are instances where an organization operates in several regions, with offices in different cities or in a safe city, while projects are focused on frontline territories.

Among other reasons for the reduction in staff, re-qualification of the team from a humanitarian profile is cited, as well as the distance of the area of activity from the front line – the closer to the FCA, the fewer people continue working in the organization.

According to respondents, the security situation forces employees to leave dangerous regions, often with their entire families, especially when it concerns families with young children.

## Conscription of Staff, Reservation

There is a significant predominance of women in team composition. Because of the circumstances, teams often consist exclusively of women; men are critically lacking in certain types of work (unloading cargo, repairs, driving).

The majority of CSOs have no way to reserve positions for military-age individuals, so there are almost no men on staff – the exception being ITA projects, where the organization can reserve 50% of project workers. At the same time, this creates another problem – it is difficult to find the remaining 50% of workers who agree to work without reservation.

Another option is engaging military-age men as volunteers, in particular those already working at critical infrastructure enterprises, in utility institutions, or who have a legal deferral from conscription. In other cases, military-age personnel are either already conscripted, or organizations cannot effectively hire new workers in this category.

Cases were reported in which one contractor was conscripted, and the CSO had difficulty finding a replacement contractor that met the donor program requirements.

Respondents emphasize the importance of giving CSOs the ability to reserve at least some military-age workers for whom there is a critical need – drivers, workers, and loaders. According to respondents, the ability to reserve military-age individuals would greatly facilitate, and in some cases enable, CSOs' work.



*«And on the reservation issue (note: reservation of military-age employees), I also support it. The same drivers and workers who fix our plumbing, connect the heating, and do cosmetic repairs – this issue is also relevant for us,»*

noted a representative of an organization from Zaporizhzhia.

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## Staff Qualifications

A frequent problem is the lack of qualified personnel. CSOs face the absence of professional experts on the ground. One respondent, for example, has been looking for a social worker for 8 months, even though the salary level is fairly high.

In other cases, CSOs lack the funding to attract qualified personnel, or short-term projects do not allow them to engage a specialist permanently.

Respondents also emphasize that donor requirements for specialists providing services in their projects are too high – very few candidates on the ground meet them.

## Volunteer Engagement

Volunteer engagement is systematic and ongoing among the surveyed CSOs. It is worth noting that the conditions and scale of volunteer cooperation vary.

Some organizations work exclusively as volunteers, without formalizing employment relations. Such cases are numerous, especially among CSOs engaged in humanitarian activities since the start of the full-scale invasion. The practice of engaging male volunteers (mostly for certain types of work related to the transportation and unloading of cargo) who are already assigned to utility institutions, while the organization's main staff consists of women, is common.

In CSOs operating in several regions, there is a mixed system of volunteers, hired employees, and rapid response groups.

According to respondents representing advocacy CSOs, they do not practice volunteer cooperation; instead, organizations have interns.

In most cases, there is no formalization of relations with volunteers. This is because a contract is not necessary: volunteers agree to work even without a formal agreement, and they are engaged as needed. At the same time, another experience: CSOs with a specific regulation on volunteering prepare an onboarding program and a questionnaire for potential volunteers. Subsequently, a contract is concluded with the volunteer.

Volunteer insurance is extremely rare. This primarily concerns large network organizations and organizations that recruit volunteers through their platforms. Respondents emphasized the importance of having such insurance, as it is an additional element of protection and motivation. They also shared their experience that the inability to reserve volunteers creates additional difficulties.



*“This is an important part (note: volunteer insurance). It demonstrates care for volunteers, because people work 24/7 and are unprotected; it is insurance. I saw it with my own people: they perceived it as care. But the very process when people received insurance was very important to them from a moral point of view: they are cared for,”*

shared a representative of an organization from Dnipropetrovsk Oblast.

The need for legislative regulation of a volunteer's status was also discussed, including issues such as compensation for injuries or deaths during evacuations, the transportation of humanitarian cargo, and other matters.

Separately, organizations mentioned participating in joint platforms and partnerships to obtain resources, such as the Volunteering Forum, as well as engaging in advocacy activities in the fields of security and volunteering.

Respondents' answers reveal that the number of volunteers has decreased. The outflow of volunteers is primarily associated with burnout and emotional exhaustion.

## Psycho-emotional Support of the Team

Fatigue, constant stress, burnout, and emotional exhaustion in the fifth year of the full-scale invasion have reached critical proportions among CSOs working in frontline territories.

Respondents agree on the necessity of adequate psychological support, as constant psycho-emotional loads affect the effectiveness of team operations. One focus group participant shared that their team had

severely “burned out” and was effectively “going with the flow”. They continue their activities, holding on to the motto “no one else but us” in the context of working in frontline communities.

According to respondents, some teams that started working relatively recently are running on enthusiasm.

There is no uniform approach among those surveyed regarding the team’s psycho-emotional support. Some organizations include a psychologist on staff; others practice retreats or a system of one-on-one meetings with management to exchange ideas.

A formalized approach to providing psychological assistance is not uncommon when a psychologist comes to the community only once, and “more so for the sake of appearances”. Respondents consider such initiatives ineffective. Skeptical views about working with a psychologist in general were also expressed. According to some CSO representatives, working with a psychologist for a few hours may be helpful in peacetime, while people under 24/7 shelling need to feel safe at least temporarily. In that case, a team retreat for several days in the rear regions would work better.

Retreats are practiced among CSO teams working in frontline regions. They have actively applied for retreat grants and have experience conducting retreats in 2022 and 2023. It is worth noting that respondents repeatedly mentioned the gradual reduction in psychological support for representatives of civil society organizations.

However, not all organizations can obtain psycho-emotional support for their teams. Some respondents have not encountered projects that would cover such costs; others have faced the challenge of finding a facilitator who could professionally lead a retreat for a CSO team working in a frontline region.

## **Provision of Equipment to the Team**

Equipment provision among CSOs is uneven. There are organizations whose offices and teams are fully equipped with everything necessary – computers, printers. However, another situation also exists. Among respondents, there is experience of purchasing all equipment with their own funds, and in newly established organizations surveyed, the required working equipment is often completely absent.

The lack of necessary equipment is a significant challenge for CSO operations, as is the need to master large language models (such as GPT and Gemini).

According to respondents’ experience, donors are very reluctant to cover the costs of computers and other equipment necessary for work.

## **Strategic Planning of Activities**

Respondents’ planning approaches are non-uniform, though the majority demonstrate a low level of strategic planning for organizational activities.

Some organizations mention the existence of strategic documents and plans of varying duration. These include strategic sessions and the definition of generalized three-year plans, operational plans, and a combination of short-term and long-term planning. Some organizations have developed internal documents, including job descriptions, internal policies, and specialized strategies, such as resource mobilization strategies or protection strategies. In some cases, organizations are updating or developing strategic documents.

At the same time, most respondents indicate the absence of long-term planning. The most common practice is planning for 1 year, while longer-term planning is considered difficult or unachievable. Some organizations directly indicate the absence of strategies or describe planning as chaotic. A focus on responding to current needs and requests without a clear long-term vision is also noted.



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*«I don't know who manages to plan amid constant uncertainty,»*

shared a representative of an organization from Mykolaiv.

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The influence of external factors on the planning process is emphasized. Respondents note the difficulty of planning under uncertainty and a complex security situation, as well as the dependence on funding availability. Answers also mention experience with annual budgeting and the inability to continue it. In addition, the growing need to develop internal documents and policies that affect the planning process is noted.

Overall, responses reveal a formalized approach to planning (where the existence of planning is a donor requirement and the writing of various policies is driven not by the internal need of a particular organization, but by the condition for obtaining donor funding) and situational response, as well as the existence of organizations that are only planning to implement strategic planning or are in the process of developing it. Some participants emphasize that the level of bureaucratization of internal processes has increased many times compared to 2022.

## COMMUNICATION AND INTERACTION

Communication problems, power outages, and logistics issues also create difficulties in working with beneficiaries. Constant drone attacks and the advance of the front line make it impossible to deliver humanitarian aid or carry out evacuations from certain regions.

Additional factors include social tension caused by the war, and as a result, residents' distrust of LSG bodies, as well as fatigue from constant stress and fear, the isolation of frontline communities from the national discourse, the closed nature of local authorities, and the absence of assistance and dialogue on their part, creating additional challenges for CSOs in frontline territories.

At the same time, donors' prejudice and misunderstanding of the specifics of working in frontline regions only amplify these difficulties.

### Interaction with Authorities

According to the surveyed CSOs, communication with local self-government bodies largely depends on local authorities' interest in cooperation. Respondents repeatedly noted that the openness of the community head or village elder influences the effectiveness of cooperation in a specific community.



*“First and foremost, the activities of any organization depend on the level of communication with local self-government bodies. Unfortunately, we encounter such a situation. We are not talking about every community, every rayon, every settlement. But everything depends on who is the head of the given community and who is the starosta of the given settlement,”*

noted a representative of an organization from Dnipropetrovsk Oblast.

Among the reasons for difficulties in cooperation with local self-government bodies, respondents cite:

- lack of interest and passivity of LSG bodies in interaction with the public;
- excessive workload of LSG bodies with other functions;
- unwillingness to cooperate due to excessive bureaucratization of the process (concluding cooperation agreements, memoranda, and other formalization of relations);
- failure to perceive the civil society sector by local authorities as a full-fledged partner and, accordingly, ignoring potential cooperation.



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*“It seems to me that the local officials are not interested in CSO bodies existing. It feels like we are getting in their way, and if we turn to them for help, they not only fail to harm us but also fail to help. Some projects that require mandatory cooperation between a civil society organization and local authorities pass us by solely because local self-government bodies are not interested in this cooperation and do not understand that much can be done for the community through the civil society sector. So, for us, cooperation with authorities is a pain point,”*

shared a representative of an organization from Chernihiv Oblast.

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The passive position of local authorities and the low level of trust in LSG bodies prompt civil society organizations to seek other options for working in communities. Focus group participants shared that in such cases, they either found others interested in changing something in their community or preferred to work independently in their communities, avoiding interaction with local authorities.

It is worth noting that among those surveyed, there was also a positive experience of cooperation with local self-government representatives. For example, an organization relocated from Melitopol (Zaporizhzhia Oblast) received premises for its activities from the Zaporizhzhia City Council, enabling it to continue operating in a relatively safe location. CSOs also cooperate with local authorities in the humanitarian sphere (delivery of humanitarian aid by village starostas to settlements that CSO humanitarian transport cannot reach due to the security situation, coordination of evacuation routes, cooperation on the resettlement of evacuated people, and the provision of premises for temporary accommodation).

There are cases of concluding memoranda with local self-government bodies and military administrations. According to respondents, formalizing cooperation through a memorandum is very important for local self-government officials and military administration employees.

CSOs also cooperate with central executive bodies. Focus group participants repeatedly reported positive interactions with certain ministries, executive authorities, state services, the police, and the prosecution. For example, they mentioned cooperation with the Ministry of Social Policy to implement certain digital innovations to assist internally displaced persons; communication with the Ministry of Community and Territory Development regarding utility compensation; and ongoing, fruitful cooperation with the Ukrainian Parliament Commissioner for Human Rights. Some CSOs plan to deepen cooperation with CEBs by concluding memoranda.



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*“We cooperate with authorities. In particular, we are currently considering the possibility of signing a memorandum with the State Emergency Service in the direction of coordinating all these elements related to evacuation, route consolidation, logistics, and everything else,”*

said a representative of an organization from Kharkiv.

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At the same time, a problem in cooperation with authorities at the central and local levels is the lengthy bureaucratic procedures, which, according to respondents, slow down decision-making and the implementation of new, effective solutions for people.

## Interaction with Donors

Interaction with donors is not always easy for CSOs in frontline territories. In their communication with the donor community, some surveyed civil society organization representatives encountered misunderstandings and prejudice due to their work in frontline territories. Respondents reported a reduction in the presence of the donor community in their communities, and, in some cases, direct discrimination and funding refusals due to the organization's location.



*«But I have colleagues also from our association, in particular in the Semenivska community. There, about a year or so ago, a large number of donors limited their presence there, and when you submit something, they say: 'No, no, we cannot work with such a community because of constant shelling, we are not prepared to, for example, give money there.'*

*So there are such stories. I have heard more than once from a colleague that he says: 'I write and write projects, but the answer is one – they honestly say, why should we allocate funds if it will be hit and everything will be destroyed,'»*

shared a representative of an organization from Chernihiv Oblast.

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The place of registration in frontline territories often became a constraint in working with international partners. An organization relocated from the temporarily occupied city of Melitopol shared its experience of donors' reluctance to cooperate with the CSO, as for donors, the entire Zaporizhzhia Oblast is considered occupied, and, according to the respondent, "they do not want to understand that Zaporizhzhia and Melitopol are conditionally different now".

It is worth noting that such experience is not universal. Some focus group participants mentioned that their organizations have been receiving donor support for quite a long time: both before and after the start of the full-scale invasion, and no difficulties in cooperation have arisen.



*“We are also a frontline territory, but until recently, we did not have any particular restrictions, even when we submitted an application and told them that we work with youth from border villages,”*

said a representative of an organization from Chernihiv Oblast.

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Among other problems, participants mentioned donors' misunderstanding of the specifics of working in frontline territories and, accordingly, their failure to address several key issues. Due to a lack of communication with CSOs on the ground and a misunderstanding of the population's real needs, donors cannot promptly receive information on which specific types of humanitarian aid goods should be supplied as a priority. This reduces the effectiveness of humanitarian aid distribution. Respondents

often receive a large quantity of goods that are already in surplus, while goods that are quickly consumed (in particular hygiene products) are in short supply.

## Work with Beneficiaries

The primary challenge in working with beneficiaries is the informational dimension. Russian disinformation, the loss of population trust, fatigue from constant stress and fear, the influence of social media, and the large number of diverse information channels often complicate work with the local population.

Respondents shared their experience conducting media literacy training for the population and providing individual notifications to frontline community residents.



*«Difficulties in informing beneficiaries really exist, and regardless of how you do it, until you get down to individual information provision. All organizations, at both the local and their own level, distribute one or another information – who, when, how, what kind of assistance will be provided, what the conditions are, who can receive it,»*

said a representative of an organization from Dnipropetrovsk Oblast.

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An additional challenge is mobile communication disruptions and the inability to directly contact the community without the support of local self-government bodies. At the same time, surveyed CSOs repeatedly emphasized that personal information sharing works best when done in collaboration with communities.



*“The main problem is precisely that a person does not know what will happen to them next. And what should they do? Therefore, word of mouth and personally telling everyone about what we can do, how we can do it, what our partners can do – this works best,”*

said a representative of an organization from Zaporizhzhia.

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## Cooperation with Other CSOs

Respondents mostly left positive comments about communication within the sector. Surveyed CSOs actively interact with each other in various formats – networking, participation in forums, concluding memoranda, joint volunteer projects, training, workshops on working with veterans and other population groups, and collaborations to obtain joint funding.

Cooperation between newly established or small-scale CSOs and large network organizations is not uncommon. For example, respondents mentioned the BRIDGE platform of the charitable organization “Relief Coordination Center” (RCC), of which they are members, and their cooperation with RCC on humanitarian projects, in particular, the opportunity to insure their volunteers through this cooperation.

CSOs often collaborate in implementing humanitarian projects, including logistics support, the provision of humanitarian kits from partners, and the coordination of evacuations and the resettlement of evacuees.



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*“As for partnerships with civil society organizations, we do have them, and sometimes they might be unsuccessful, but in the majority, they are successful. We agree with civil society organizations on the strengths that are needed and what we need to implement in the community. And therefore, we use the knowledge of another civil society organization in one direction,”*

shared a representative of an organization from Sumy Oblast.

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At the same time, there are communication difficulties between CSOs. For the most part, this concerned unfair competition between organizations, violations of ethical norms in interaction, and the emergence of an entire network of pseudo-civil society organizations that create artificial competition and, accordingly, block the effective work of other CSOs.



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*“I wanted to add about the negative experience of cooperation with local agents and utility institutions. At the time we created them, but now we have very unfair competitors on their side who breed networks of quasi-civil society organizations, and, de facto, we have a blocking factor in working with the same communities. It could be said that this is competition, but a very strange one,”*

added a representative of an organization from Mykolaiv.

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## Communication Channels

The main ways CSOs communicate with audiences are personal interaction, social media, and traditional media.

Media work is mostly assessed as not easy and fraught with difficulties. For example, respondents shared their experiences when local media published content without permission and removed their logos. Another problem mentioned was the complete absence of local media.

Among the positive aspects, they highlighted that, despite the difficulties, cooperation remains, and, in some cases, thanks to international donors, there are even independent regional media.



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*“I also tried to communicate through the media somehow, but they live their own life. We don’t have such great needs to turn to them, but when we did turn to them, communication somehow happened,”*

said a representative of an organization from Zaporizhzhia.

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Important communication channels with beneficiaries and the general public are social media and messengers, such as Telegram, Viber, and WhatsApp.



*“Our communication channels, paradoxically, are local websites, websites of local councils, Viber, Telegram, social groups that we have built with activists, and working projects. So a very large portion has become Telegram, Viber, WhatsApp – these are channels that we need to learn to work with better,”*

shared a representative of an organization from Mykolaiv.

Some organizations have specifically developed communication strategies, communication departments, or communication specialists who manage the organization’s brand, communicate its activities, and create specialized digital products.

The widespread use of artificial intelligence among CSOs is also worth mentioning. Artificial intelligence receives both positive reviews and cautionary notes (particularly regarding the creation of deepfakes that are difficult to distinguish from real facts).

At the same time, access to foreign platforms remains a problem. For example, Zoom restricted access to its portal for one CSO, considering the entire territory of Zaporizhzhia Oblast to be occupied. This forces organizations to spend additional resources on confirming the fact of their location on Ukrainian-controlled territory.

## FINANCING

Critical security conditions, complex communication, and staffing shortages are not the only factors complicating CSOs' work. The vast majority of respondents noted that financing is the sector's weak point in frontline regions.

Among the most common challenges:

- shortage or instability of financing;
- limited access to financing for new and local organizations;
- dependence on donors and delays in the receipt of grant funds;
- absence of funds for staff remuneration;
- difficulties with financial and accounting reporting;
- limited access to material resources.

In addition, the surveyed CSOs noted that they face problems of lack of diversification of funding sources, insufficient financing of administrative costs (for example, maintaining a full-time accountant and office), a shortage of quality personnel, which in turn limits the ability to develop new projects and attract funding, as well as the consequences of USAID programme closures, due to which certain projects financed within their frameworks could not be completed.

### Specific Challenges

Along with the typical civil society funding issues, such as dependence on donor grants or exclusively project-based fundraising, respondents also mentioned problems specific to the geography of CSO activities in frontline territories.

Organizations frequently mentioned the need for additional funds for energy equipment. Generators and charging stations often break down due to constant use or damage, and replacing them is problematic. Also, in connection with the security situation, the need for additional team protection was mentioned. For example, donors do not allocate funds for drone detection or countermeasures, considering them military equipment, and do not support financing armored transport. A similar situation applies to funds for office repairs that may be damaged by shelling.



*«Due to drone attacks, security risks during the evacuation phase increased; none of the donors or partners supports the allocation of funds for drone countermeasure or detection means (they consider it military equipment, although it is for the lives of our employees), and the need for specifically armored transport is also ignored,»*

shared a representative of an organization from Kharkiv.

The insufficiency of funds for personnel maintenance is compounded by the living conditions of CSO employees in frontline territories – they are often residents of frontline or temporarily occupied territories who are IDPs with the need to pay for housing rent, support other family members, etc. Some respondents cite examples of discrimination based on their work in frontline regions – blocking of foreign currency transfers by international banks, limited access to local resources, and partner financial opportunities due to the status of a frontline territory.

## Inflexibility in Cooperation with Donors

In addition, focus group respondents often emphasized the inflexibility of donor financing. In particular, participants noted that donors require clearly defined plans and closed quantitative indicators, whereas CSO activities, especially in humanitarian response, are dynamic and difficult to predict.

This creates situations where organizations cannot determine in advance, for example, evacuation volumes or other indicators, and also face difficulties in making changes to already approved projects. Additionally, this problem is exacerbated by delays between application submission and funding receipt, which often result in the relevance of planned activities being lost.



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*“We face the fact that it is difficult, for example, to explain to donors how we carry out evacuations. For example, they ask for an evacuation schedule. So, I want to say that it is very difficult to explain that such an evacuation schedule cannot exist,”*

shared a representative of an organization from Kherson Oblast.

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Another challenge related to the specificities of cooperation with donors is the orientation towards predetermined funding priorities and donors’ limited ability to respond promptly to new needs. Respondents note that donor organizations work within the framework of approved strategic plans, and even when new requests from communities or local self-government bodies arise, they require significant time for consideration.

This relates to the need to undergo approval and verification procedures, which was also noted as a problem. As a result, CSOs are forced to spend significant resources on advocating for new needs, which slows down response to crisis challenges.

Some organizations reported difficulties with reporting, an insufficient number of financial specialists and accountants in their environments, and inconsistencies between Ukrainian legislation and donor regulations in the financial sphere.

## LEGAL ASPECTS

Difficulties also arise in the legal sphere: registration or re-registration of the organization; change of legal address; access to state registers; opening and maintenance of bank accounts; concluding contracts; compliance with legislative requirements regarding deadlines for submitting reports under martial law; submission of legal and donor reports; inability to use state services due to the inability to create a Diia. Signature.

Specific difficulties arise with legislation – the inability to remove from the organization’s balance sheet transport that was engaged through international partners at the start of the full-scale invasion and transferred to communities and other CSOs; frequent changes to tax and accounting legislation requiring constant monitoring and adaptation; inconsistency of donor reporting requirements with legal requirements, leading to potential risks of losing non-profit status and additional tax burden.

### Registration Actions

The surveyed CSO representatives had experience with registration actions, such as re-registration of a CSO and registration of amendments to the Statute. In most cases, registration actions did not cause difficulties; the majority managed to make changes immediately or, after correcting minor remarks, make them fairly quickly.



*“We had no problems with re-registration. It is a general system – simply submitting the appropriate application for a change of legal address. Given the fact that we have a legal department, we had no difficulties,”*

noted a representative of an organization from Kharkiv Oblast.

However, such experience is not the same for all CSOs in frontline territories. Some respondents complained about the length of such procedures (several months to register a change of director), the lack of alternative options (the inability to make changes online), and excessive formalization of the process.



*«I would like to note the existence of a certain discrimination against civil society and charitable organizations compared to commercial enterprises. In particular, there is no way to register changes through the Diia app, as LLCs can. It would be appropriate for such an opportunity to be open to civil society organizations as well, for submitting changes to NCEAs or locations. Currently, paper documents must be submitted through the ASSC or a notary, while commercial structures can do this online,»*

noted a representative of an organization from Kharkiv.

No widespread problems with access to state registers among CSOs in frontline territories have been recorded.

## Submission of Reports and Financial Monitoring

Regarding tax services, most respondents did not encounter difficulties. The surveyed CSOs shared their experiences of verbal and written communication with the tax authority, without tax audits being conducted. Communication with the tax authority is simpler for teams that have a full-time accountant.

Official tax audits, financial monitoring measures, and court restrictions have not become systemic among the surveyed CSO representatives, although individual cases of their application are recorded in practice.

Respondents also separately highlighted reporting deadlines. Opinions were expressed regarding the burden of monthly reporting, excessive bureaucratization of the process, the complexity and insufficient clarity of reporting requirements, and the absence of exceptions for frontline CSOs to meet reporting deadlines (under constant electricity and communication outages, submitting documents and required reports is difficult).

## Banking Services

Banking services received mixed reactions from the surveyed CSOs. Respondents shared both positive experiences of bank loyalty and cases of outright discrimination by these institutions.

When opening and maintaining bank accounts, some organizations had to submit additional confirming documents that the registration territory is under Ukrainian government control. Some CSOs were forced to change their place of registration due to problems with banking services for CSOs from frontline territories.

According to respondents, such a banking policy erases the identity of organizations and weakens the civil society sector in these regions. Respondents repeatedly mentioned the banks' biased attitude towards CSOs registered in frontline territories, and the only solution to this problem often amounted to changing the CSO's registration location.

In other cases, neutral feedback on banking services was noted, with no obstacles to work or questions about reporting, aside from minor clarifications. A positive example of interaction with PrivatBank, which served communities in the frontline and already occupied territories until the last moment, was also cited.

## Importing Humanitarian Aid

A significant portion of the surveyed CSOs in frontline territories is engaged in humanitarian activities. Among the problems they encountered is, in particular, a misunderstanding of the rules governing the processing of humanitarian cargo without customs clearance. According to respondents, the system is tailored for vehicle-based transportation, and there is no mechanism for sending humanitarian aid by post.



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*“We faced a situation where British partners wanted to send equipment by post, but we could not find a way to process it as humanitarian aid without customs duties. Social protection also could not explain how to proceed,”*

said a representative of an organization from Sumy Oblast

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Among other things, excessive bureaucratization of the reporting process, constant legislative updates, an overly complex reporting system that does not account for the specifics of distributing humanitarian aid in particularly dangerous regions, and the conditions of the start of the full-scale invasion are highlighted. The problem of declaring vehicles recognized as humanitarian aid is separately highlighted.



*“The more humanitarian aid we bring to Ukraine since the start of the full-scale invasion, the more the government tries to over-regulate these rules to create more bureaucratic processes, inspections, controls, and reporting. Therefore, in my opinion, we need to work in the opposite direction – reduce all this reporting, reduce all these bureaucratic processes,”*

noted a representative of an organization from Kharkiv.

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## Legal Assistance

Not all surveyed CSOs have access to legal assistance. Teams with large staff have legal departments, while others receive legal assistance from partners, for example, CF “Caritas Zaporizhzhia”, “Right to Protection”, “Posmishka UA”, or state bodies. Respondents also report providing legal assistance to other CSOs.

# CONCLUSIONS

The study aimed to identify the main challenges faced by CSOs operating in frontline territories.

The findings indicate that working conditions in frontline territories directly affect the ability to conduct activities, under the complex influence of security, logistical, staffing, financial, and legal constraints.

The most critical challenges are an unstable security situation, limited access to communities due to increased shelling, an acute shortage of human resources, inflexibility, and a shortage of financing, particularly the failure to account for additional costs of team security measures and the discriminatory nature of banking policies. The difficulties in interaction with authorities and excessive bureaucratization of procedures also have a significant impact on organizational activities.

The identified challenges are systemic and interconnected. Security and logistical conditions present the greatest challenge to CSO operations and are also often the cause of a range of other problems – organizational, communication with key stakeholders, etc.

Some of the financial problems in organizations in frontline territories are analogous to the challenges of the civil society sector as a whole. At the same time, working near the frontline contact area creates specific needs, particularly for enhanced personal security, and necessitates additional financing.

In addition to the problems mentioned above, frontline CSOs also face the donor community's misunderstanding of the specific conditions of their activities and the need to adjust the legal framework for their operations.

It is separately worth noting that the surveyed organizations demonstrated a high level of adaptability. The unstable security situation forces them to seek ways to continue their work despite numerous risks, and organizations approach the resolution of a range of issues in unconventional ways, drawing on their teams and partners. Organizations mentioned approaches such as flexibility in planning, networking, and interaction with various actors, as well as hybrid working formats. However, this adaptability comes at a great cost and often remains at the very limit of the organization's resource capabilities.

In the absence of adequate support and adaptation, there is a risk of a decline in organizations' capacity to continue their activities in the region and ensure continuity of assistance to the population, which may negatively affect community resilience in frontline regions.

The identified findings necessitate the development of comprehensive solutions to support CSO activities and reduce barriers to their work.

# RECOMMENDATIONS

## For CSOs operating in frontline territories

### *Security and Logistics*

- Ensure that staff systematically undergo training in first aid, mine safety, civil protection, and security management in conditions of armed conflict. Training should cover both new and existing employees and volunteers, with regular knowledge updates (at least once a year).
- Develop or review and update internal security policies and evacuation protocols, considering the current security situation. Documents should include clear threat response procedures (shelling, drone attacks), evacuation routes, notification contact chains, and criteria for suspending activities.
- Use the mechanism for obtaining a vehicle as humanitarian aid, provided for by current Ukrainian legislation. CSOs operating in humanitarian response in Ukraine should monitor the adoption of secondary regulatory legal acts establishing the procedure for verifying organizations and undergo the relevant verification promptly to obtain the right to import vehicles without paying customs duties.

### *Organizational Aspects*

- Formalize cooperation with volunteers by concluding volunteer activity agreements in accordance with the Law of Ukraine “On Volunteer Activities”. The existence of an agreement is a necessary condition for receiving funds in the event of a volunteer’s death or injury while performing the organization’s tasks, as well as for their insurance. It is recommended to develop a standardized onboarding process for new volunteers that includes a security briefing and familiarization with internal procedures.
- Develop and regularly update the organization’s risk matrix. The matrix should cover security, operational, staffing, and financial risks, contain an assessment of their likelihood and potential impact, and identify responsible people and preventive measures. This tool is the basis for making informed management decisions under conditions of uncertainty.

### *Legal Aspects*

- Enhance legal awareness in the areas of tax legislation, reporting of non-profit organizations, and documentary processing of humanitarian aid operations. It is recommended to engage legal advisors or partner organizations that provide legal support to conduct regular information sessions on key legislative changes, particularly regarding financial monitoring and donor reporting requirements, and to seek free legal assistance from civil society organizations and authorities.

## For the donor community

### *Security and Logistics*

- Include in the list of permissible project budget items the costs of ensuring staff security: personal protective equipment, drone detectors, armored transport, or reinforcement of existing vehicles. Such costs should be considered standard operating costs for organizations working in high-risk zones, not as military equipment.

- Review and adapt their own internal protocols, eligibility criteria, and reporting requirements, taking into account the specifics of working in frontline communities. In particular, introduce flexible mechanisms to adjust approved budgets and work plans, shorten the time between application submission and receipt of financing, and abandon the practice of denying financing solely based on an organization's geographical location or the territories where project activities are planned (frontline communities).
- Provide, within project budget frameworks, the possibility of re-purchasing energy equipment (generators, battery stations, uninterruptible power supplies) and costs for restoring office premises damaged as a result of shelling. Such costs are foreseeable under conditions of active hostilities and should be considered a possible component of the operational budget for frontline organizations.

### **Organizational**

- Provide a separate budget line for the psycho-emotional support of CSO teams working in high-stress zones, in particular, the financing of off-site retreats and group recovery activities in safe regions. Such support is an investment in organizational sustainability: burnout prevention reduces staff turnover and improves operational efficiency in the long term.
- Review the qualification requirements for specialists engaged in the implementation of projects in frontline territories, taking into account the acute staffing deficit in the region. It is appropriate to introduce a differentiated approach: ease formal education and experience requirements for positions where knowledge of the local context is key, and provide for the conduct or financing of on-the-job training to improve the qualifications of existing personnel.
- Include computer and office equipment in the list of permissible project budget items. For small and newly established CSOs in frontline territories, the lack of basic technical equipment is a critical barrier to effective work, reporting, and communication with partners. Refusing to finance equipment does not reduce the need for it but merely shifts the costs to the organization or makes its participation in projects impossible.

### **Communication**

- Introduce regular structured consultations with CSOs working in frontline territories for a better understanding of the specifics of their activities and current needs. It is recommended to hold regular meetings (online or via field visits), the results of which should be adjustments to financing priorities and the adaptation of donor requirements to actual working conditions.

### **Financial**

- Adhere to the principle of equal access to financing for CSOs regardless of their geographical location or the territories where project activities are planned (frontline communities). The organization's registration in frontline or war-affected territories cannot be grounds for refusal of financing. Instead, it is recommended to introduce special, flexible conditions for organizations operating in high-risk zones, including simplified reporting requirements and the possibility of advance financing.

### **Legal**

- Support the conduct of educational events and the development of practical informational materials on legal awareness for CSOs, in particular on issues of reporting, banking services, and humanitarian aid legislation. Legal support for organizations is a preventive measure that reduces the risk of losing non-profit status and improves the quality of donor reporting.

## For authorities and local self-government

### *Security and Logistics*

- Ensure that frontline communities have adequate civil protection facilities in accordance with established standards. The arrangement of shelters in buildings where CSO offices and hubs are located should be prioritized, given their role as points for humanitarian aid to the population. Local self-government bodies should inform CSOs about plans for creating new shelters in their communities.
- As a matter of priority, develop and adopt secondary regulatory legal acts in fulfillment of the Law of Ukraine “On Humanitarian Aid” regarding the procedure for verifying humanitarian organizations. The regulatory acts should contain clear, transparent, and accessible verification criteria, application review deadlines, and appeal mechanisms for decisions, so that CSOs can take advantage of the opportunities provided by law in the context of active humanitarian activities.

### *Organizational*

- Legislatively regulate the issue of reserving military-age employees of CSOs conducting activities in frontline territories, by analogy with the reservation mechanisms provided for enterprises of critical infrastructure and utility institutions. First and foremost, the reservation should cover categories of personnel indispensable to humanitarian operations: drivers, logisticians, and technical workers. The absence of such a mechanism significantly limits CSOs’ operational capacity and, in some cases, makes their work impossible.

### *Communication*

- Establish systematic two-way communication between authorities and CSOs in frontline territories, including through electronic public consultation platforms (“VzaiemoDiia”, e-DEM etc.) and regular coordination meetings at the community level. Local self-government bodies should regard CSOs as full-fledged partners in addressing humanitarian and social challenges, not merely as executors of individual functions.

### *Financial*

- Develop and implement additional mechanisms of state and private financial support for CSOs in frontline territories, in particular: holding targeted project competitions for organizations from frontline regions at the level of central executive bodies and regional military administrations; introducing legislative amendments to stimulate CSO financing from alternative sources, corporate social responsibility, philanthropy, and charitable contributions from individuals.

### *Legal*

- Expand the functionality of the Unified State Web Portal of Electronic Services “[Diia](#)” for civil society and charitable organizations, granting them the ability to submit applications for changes of location, leadership, and types of activities in online format, by analogy with the capabilities already available for business entities operating for profit. This is particularly relevant for CSOs in frontline territories, where physical access to the ASSC or a notary may be complicated by the security situation.

- Initiate an inter-agency dialogue involving the National Bank of Ukraine, relevant executive authorities, banking sector representatives, and CSOs with the aim of developing systemic solutions to overcome the discriminatory attitude of banks towards organizations registered in frontline territories. Following the dialogue, develop relevant explanations or regulatory recommendations for banking institutions that would make it impossible to refuse services solely on the basis of the organization's place of registration. Changing the place of registration of a CSO as the only available solution to the problem is an unacceptable outcome that blurs the identity and presence of the civil society sector in frontline regions.

