



# Audit of reforms

## Assessment report on changes in regions after visa liberalization

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## Foreword

Ukraine has received the visa-free regime with the European Union in June 2017, having opened up additional opportunities for people-to-people contacts. However, the potential of visa liberalization for reforms in the fields of public order, justice and security was equally important. Outdated policies have got a chance for modernization with the launch of the Visa Liberalization Action Plan (VLAP) which Ukraine has received from the EU in November 2010.

For almost seven years, the Ukrainian authorities tried to fulfill the tasks foreseen by VLAP. During the same period the public monitoring was performed to fix progress or deviation from the criteria defined by the European Union. The monitoring was accompanied by advocacy of unpopular political decisions and active public informing on the state of affairs with the reforms шьздуьутефешшт. The results of independent monitoring and expertise were used by profile government bodies involved in the process of carrying out the tasks, as well as by EU experts who needed an unbiased assessments of the quality of the reform process.

At the end of 2015, when the European Commission released the latest report, which recognized the fulfillment of all the commitments of VLAP, civic society faced a challenge to find new tools to support and control the sustainability of the changes. One of the reasons for doubts was the example of Moldova which was the first among the Eastern Partnership countries to successfully complete its VLAP, but demonstrated rollback of some reforms after the end of the visa liberalization process. Therefore, the decision of the European Union to introduce post-liberalization monitoring for the countries that completed the VLAP was not a surprise. Moreover, public activists and independent experts involved in the process of visa liberalization have supported the idea of continuing the monitoring, in particular, in the field of combating corruption, as one of the biggest problems in Ukrainian realities.

At least for seven years the European Commission will monitor the development of the initiated reforms, and in case of a rollback EU institutions will have the right to suspend visa-free travels for Ukrainians. Apart from anticorruption focus, the EU will also focus on policies that have demonstrated some success or laid a solid foundation for qualitative change, such as **security of documents, border management, migration management and asylum policies, anti-discrimination and gender policies.**

The conclusions and assessments of reforms' implementation progress will mostly be based on official reports of the Government of Ukraine and the EU Delegation in Ukraine. However, both sides of the process will need unbiased assessments and independent sectoral expertise.

That is why NGO "Europe without Barriers" believes that involving citizens in controlling the process of implementing the changes will help to create a solid foundation for transparency and accountability in the implementation of the tasks. It is also important to shift the focus from the "center" to regions where decentralization processes are creating a new system of coordination and management.

Basing previous experience of monitoring and advocating reforms in the framework of visa liberalization, "Europe without Barriers" has developed a new research methodology. It

allows to monitor the quality of the implemented changes after visa-free regime has entered into force, as well as the readiness of local authorities to continue the reforms on the ground and the readiness of central government officials to carry out communication of the necessary changes to keep moving forward.

The proposed report is the result of the work by a group of experts from 6 regions of Ukraine under the coordination of the NGO "Europe without barriers". The publication contains a public assessment of new areas of state policy that have been launched in the framework of visa liberalization and have found their continuation in the Association Agreement, in particular regarding the issuance of new identification documents (biometric passports and ID cards), implementation of the integrated border management approach (border crossing conditions, in particular fight against corruption), migration management and asylum policies (implementation of the Law of Ukraine "On Foreign Labor Migration" and ensuring the rights of refugees) and countering discrimination (implementing the National Strategy for Human Rights).

The research is the first "civic audit of reforms" on regional level, and is supposed to be useful for the civil servants involved in the implementation of the Association Agreement, as well as all interested partners in the European Union.

**Iryna Sushko**  
**Executive director**  
**Europe without Barriers**

# Main tendencies of implementing reforms in 6 regions of Ukraine

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## Methodology of the research

“Audit of reforms” is the first complex assessment of **implementing on the local level in Ukraine the tasks which were set by the EU during visa liberalization dialogue**. The research provides answers to questions, which an NGO “*Europe without Barriers*” has faced upon Ukraine’s visa-free regime with the EU came into force:

- *What is the state of affairs in implementing reforms in the fields of **right for free movement, migration and border management, and countering discrimination** after Ukraine has been granted visa-free regime with the EU? Didn’t the reforms rollback?*
- *How is the legislation implemented in these fields on the local level?*
- *What should be done by local authorities in order to reach the full implementation of the reforms in the mentioned spheres?*
- *How to create a demand to continue the reforms in the absence of visa-free incentive?*

“Europe without Barriers” brought together a network of NGOs and think tanks from 6 regions of Ukraine to conduct the audit: *Vinnitsia Regional Information Centre “Kreativ”*, “*Centre of Strategic Partnership*” in Transcarpathian region, “*Centre of Municipal and Regional Development – Resource Centre*” in Ivano-Frankivsk region, “*Centre “Women’s Perspectives”*” in Lviv region, NGO “*Promoting Intercultural Cooperation*” in Odesa region, and “*Kherson Regional Centre “Successful Woman”*” in Kherson region.

The field stage of “Audit of reforms” was conducted in *July-August 2017*, using the Methodology developed by the NGO “Europe without Barriers”. **The sections and indicators of Methodology are structured in compliance with tasks of EU-Ukraine Visa Liberalization Action Plan<sup>1</sup>**, Decree of the President of Ukraine “On the National Plan on implementing Visa Liberalization Action Plan”<sup>2</sup>, and the EU-Ukraine Association Agenda to prepare and facilitate the implementation of the Association Agreement<sup>3</sup>. Each block of Methodology consists of a bunch of indicators with a scale of points ranged from 0 to 2. Assessment was conducted by civic organizations on the basis of answers of local authorities and self-government bodies to official requests, monitoring results, consultations with stakeholders and media monitoring. Each block was assigned with an appropriate level of implementation of reform according to the sum of the set points:

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<sup>1</sup> [http://zakon5.rada.gov.ua/laws/show/984\\_001](http://zakon5.rada.gov.ua/laws/show/984_001)

<sup>2</sup> <http://zakon0.rada.gov.ua/laws/show/494/2011>

<sup>3</sup> [http://zakon5.rada.gov.ua/laws/show/994\\_990](http://zakon5.rada.gov.ua/laws/show/994_990)

- **Level 1.** Weak. If region gets less than 39% of maximum score
- **Level 2.** Average. If region gets between 40% and 69% of maximum score
- **Level 3.** High. If region gets 70% -100% points

In the section **“Document Security” 13 indicators** of performing the Law of Ukraine “On the unified state demographic registry and documents confirming the citizenship of Ukraine, certifying a person or his/her special status”<sup>4</sup>, Resolution of the Cabinet of Ministers of Ukraine No 152, dated May 7, 2014 on the procedure of issuing foreign passports<sup>5</sup>, and Resolution of the Cabinet of Ministers of Ukraine No 302, dated March 25, 2015 on the procedure of issuing passport of citizen of Ukraine<sup>6</sup> (ID card) were researched. The researched **indicators included:** availability of facilities for issuing foreign passports and ID cards in State Migration Service offices, Centers for providing administrative services, centers “Passport service”, accessibility of services for people with disabilities and internally displaced persons, equipping government agencies and institutions with ID-card readers etc.

In the section **“Border Management” 7 indicators** of implementation of Integrated border management concept<sup>7</sup>, adopted under Visa Liberalization Action Plan, and implementation of EU-Ukraine Association Agenda were researched by the representatives of the involved NGOs, **including the following issues:** equipping of border checkpoints with biometric passport readers, connection to Interpol databases, conducting joint checks and joint border patrolling with border guards of neighboring countries, information exchange between neighboring countries and risk analysis.

In the section **“Management of Migration”** the implementation of the Law of Ukraine “On Foreign Labor Migration”<sup>8</sup>, the Cabinet of Ministers of Ukraine Order “On Approval of the Action Plan on integration of refugees and persons in need of complementary protection into the Ukrainian society for the period until 2020”<sup>9</sup> and the Order of the Ministry of Internal Affairs of Ukraine “On approval of methodology of risk analysis for combating illegal migration”<sup>10</sup> on the local level was researched. **The following indicators were researched:** carrying out activities of the local authorities in order to disseminate information on the conditions of leaving Ukraine and employment abroad, the risks of getting into situations related to trafficking in human beings, prevention of illegal external labor migration; carrying out measures on the reintegration of migrant workers who returned to Ukraine; implementation of measures to detect irregular migrants; carrying out measures on the reintegration of persons recognized as refugees into the Ukrainian society.

In the section **“Countering Discrimination”** the actions of the local authorities on implementation of the Action Plan to Implement the National Human Rights Strategy of Ukraine by 2020 were researched. In total, **12 indicators were researched, including:**

<sup>4</sup> <http://zakon3.rada.gov.ua/laws/show/5492-17>

<sup>5</sup> <http://zakon0.rada.gov.ua/laws/show/152-2014-%D0%BF>

<sup>6</sup> <http://zakon3.rada.gov.ua/laws/show/302-2015-%D0%BF>

<sup>7</sup> <http://zakon5.rada.gov.ua/laws/show/1149-2015-%D1%80>

<sup>8</sup> <http://zakon3.rada.gov.ua/laws/show/761-19>

<sup>9</sup> <http://zakon2.rada.gov.ua/laws/show/605-2012-%D1%80>

<sup>10</sup> <http://zakon3.rada.gov.ua/laws/show/z0587-15>

measures to raise awareness among citizens in the area of countering discrimination, disseminating gender knowledge and overcoming gender stereotypes, combating gender-based violence, trafficking in human beings and slavery; ensuring unobstructed access of citizens to remedies against discrimination; examination and implementation of reconstruction of public and communal institutions of health and education on accessibility for people with disabilities; the establishment of centers for provision of assistance to victims of gender-based violence; organization of work of the leadership schools and preparation schools for the deputies of local councils for women; establishment of information and consultation centers for migrants. In addition, it was researched whether the cases of discrimination on the basis of age, gender or sexual orientation during employment and in the workplace have been reduced upon introduction of the amendment on the prohibition of discrimination in employment on the basis of sexual orientation and gender identity, according to Article 2 of the Labor Code<sup>11</sup>. Another indicator that has been taken into account is whether safe public activities aimed at counteracting LGBT discrimination, in particular, if equality march can be conducted in the specific region.

*Restriction of the research* was caused due to incomplete information provided by local authorities. Representatives of some District State Administrations have only partially responded to public questions, avoiding the requests to which they had no positive answers. It is also worth noting the lack of awareness of the local authorities on the implementation of the Law of Ukraine “On Foreign Labor Migration”, the Action Plan to Implement the National Human Rights Strategy and the need to equip state institutions and government agencies with ID-card readers.

Over **500 requests were sent** out by the network of NGOs in the frames of the audit preparation process, and **more than 1000 official responses** from Regional State Administrations, District State Administrations, local executive committees of regional centers, State Migration Service, State Border Service, National Police and NGOs were processed. The complex approach used in research allows creating point recommendations for authorities in each region depending on the state of implementation of the researched reforms.

### **Document Security**

The effectiveness of the implementation of the “Document Security” reforms in all six spheres of research in accordance to the developed Methodology is carried out at **average level**. *The benefits of implementing the reform are equipping all departments of State Migration Service and “Passport service” in the researched regions with equipment for processing biometric passports and ID-cards and launching an electronic queue service.*

One of the disadvantages of the implementation of the reform is *the lack of services for the processing biometric passports and ID-cards in most of the Centers for the provision of administrative services (CPAS) in the researched regions, which causes excessive queues to the SMS units*. In Vinnytsia, Ivano-Frankivsk, Lviv and Odesa regions, only the CPASes in the regional centers has provided the services. And none of CPASes in Transcarpathian and

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<sup>11</sup> [https://humanrights.org.ua/material/pracevlashtuvannja\\_lgbt\\_jak\\_zahistiti\\_svoji\\_prava\\_na\\_roboti](https://humanrights.org.ua/material/pracevlashtuvannja_lgbt_jak_zahistiti_svoji_prava_na_roboti)

Kherson regions has issued foreign passport and ID-cards. It is worth noting that some local authorities announced plans to purchase equipment for processing biometric passports and ID-cards, including 7 districts in Vinnytsia regions, 3 districts in Transcarpathian region and the majority of districts in Ivano-Frankivsk region.

*Another disadvantage of implementing of the reform is the lack of ID-card readers in most of the local authorities and government institutions.* As a result, citizens with new passports in the form of an ID-card are forced to use unprotected from counterfeits papers for receiving administrative services and health and education services. Among all institutions, reader devices are available in the State Migration Service units, but in the CPASes and other state institutions, the situation is less positive. In Ivano-Frankivsk region, it was possible to read the ID cards only in two CPASes, in the Department of Humanitarian Policy of Lviv City Council in Lviv region, the Office of the National Police in Odesa region, subdivisions of Odesa City Council and units of the State Border Guard Service, CPASes in Kherson region, Department of Registration of Persons and Department of State Registration of Kakhovka. **And readers were absent in all local authorities and state institutions in Vinnytsia and Transcarpathian regions.** At the same time, representatives of local authorities often did not know about the functionality of ID-cards and needed additional clarifications from the NGO representatives before responding the official request.

Despite the low level of awareness, some local authorities had plans to purchase readers: two cities and one DSA of Transcarpathian region, three DSAs of Vinnytsia region, three cities and two districts in Lviv region and three districts in Odesa region.

*Another weak side of the implementation of the reform “Security of Documents”, which revealed during the research, was the **additional requirements for citizens who have the status of internally displaced persons.*** In particular, in July 2017, employees of the SMS in Vinnytsia advised some internally displaced persons to go to Mariupol or Kramatorsk for the purpose of issuing foreign passports; the incident was resolved after it was highlighted in the media. In Kherson region, where residents of the Crimea are actively appealing to the departments of the DMS for foreign passports, there were no cases when internally displaced persons faced obstacles in obtaining foreign passports. *However, human rights defenders confirm that cases of extortion of additional documents from internally displaced persons occur. But migrants do not appeal to specialized departments with complaints.*

Thus, issuance of foreign passports and passports of a citizen of Ukraine in the form of a card was provided through a network of subdivisions of the State Migration Service and centers “Passport service” in six researched regions of Ukraine, At the moment equipping of the CPASes and local authorities with devices for processing and reading biometric data are still in pending status.

### **Border Management**

The effectiveness of the implementation of the “Border Management” reform in all six researched areas according to the developed Methodology is carried out at high level. *All border crossing points with Moldova, Romania, Poland, Slovakia and Hungary in Lviv, Transcarpathian, Odesa and Vinnytsia regions are equipped with biometric data readers and connected to Interpol databases.*



The joint patrols of the state border with the border guards of neighboring countries, the exchange of information on the situation on the state border, the forecasts of its development, and the main results of operational activities, and measures for cooperation with the Agency FRONTEX are systematically conducted.

A joint Ukrainian-Polish consulting center “*Krakivets*” in Lviv region operates at the crossing point for the motorway connection of Mostyska border detachment. Joint control of persons, vehicles and goods passing through the state border is carried out on a permanent basis in three points of passage in Lviv region: Ugryniv, Grushiv and Smilnitsa. In 2018 it is planned to open a new crossing point for the Nizhankovichi-Malchovets motorway, where the joint control will be carried out.

It should be noted that according to the observations of the Center “Women’s Perspectives” there is *a number of problems related to personnel work* in the activities of the State Border Guard Service. The employees of the at the checkpoints work overtime, they are not provided with normal working and rest conditions, which leads to a high turnover of the State Border Guard Service staff.

### **Migration Management and Asylum Policy**

The effectiveness of the implementation of “Migration Management and Asylum Policy” reform in all six researched regions according to the developed Methodology is carried out at *average level*. Among the positive aspects, it should be noted that the work of district and region employment centers, which carry out workshops for the unemployed in order to prevent illegal labor migration and trafficking in human beings.

However, the measures to combat illegal labor migration, which are being implemented by the RSA and DSA in the researched areas, **are mostly non-systematic and have only informative character**. Often, these are lectures and lessons for schoolchildren and students, personal consultations, distribution of information leaflets, publication of informative articles in local media and official web sites.

For example, in some districts and cities of Kherson region, small funds were allocated for the production of printed materials and social advertising: *in Vysokopilskyi district - 1.5 thousand UAH, in Novovorontsovsky district - 5 thousand UAH, in Gola Prystan - 2.5 thousand UAH, in Kakhovka - 3 thousand UAH*. On Wednesday, July 30 on the occasion of the World Day Against Human Trafficking, the Department of Social and Youth Policy of the DSA in Vinnytsia region conducted an informational campaign against trafficking in human beings in all districts of the region. In particular, *10 billboards* were produced and placed. The Department, together with the Vinnytsia regional human rights organization “*Source of Hope*”, conducted an informational rally “*Know, understand, act! Counteract trafficking in human beings!*” along the route: Vinnytsia – Lipovets – Illintsi – Nemyriv – Vinnytsia and *37 thousand UAH* were used for this event from the regional budget.



*Civic organizations play a key role in combating trafficking in human beings and preventing illegal migration on the local level and carry out trainings for local officials, as well as meaningful information measures for the population.*

*The weak side of the implementation of the tasks envisaged by the Law of Ukraine “On Foreign Labor Migration” is the lack of measures for the reintegration of labor migrants in the researched regions.* Most institutions indicated that reintegration measures were not carried out in the absence of appeals or in the absence of persons who returned after labor migration to Ukraine. None of the institutions mentioned the body responsible for conducting such activities. It should be noted that the Plan of measures for ensuring reintegration into the society of labor migrants and their families was approved by the Cabinet of Ministers of Ukraine only in April 2017<sup>12</sup>.

Detection of unregulated migrants on the territory of the researched areas is carried out by the units of the State Migration Service, the State Border Service in cooperation with the departments of the National Police and the Prosecutor's Office. Responsible authorities reported on the systematic holding in 2017 of targeted preventive measures under the conditional name “Migrant” and the joint border operation “Cordon-2017”.

*The issues of integration into the Ukrainian society of persons recognized as refugees were researched in Lviv and Odesa regions only.* Mostly, local authorities have skipped the issue in official responses. In particular, the Department of the SMS in Lviv region did not provide any information regarding persons, who were granted refugee status in the region. *The Charity Fund “Right to Protection”* works with refugees in the region. According to representatives of the Charity Fund, people often had to file a lawsuit on refusals to grant refugee status or the status of a person in need of additional protection in 2016. In Odesa region it was reported about the *Program of Employment of population in Odesa region for the period until 2017*, which, among other things, provides measures aimed at facilitating the employment of refugees and asylum seekers. During the first half of 2017, *two temporary outing events were held at the Temporary Refugee Point*, including a vacancy fair dedicated to the World Refugee Day.

Therefore, we can conclude that measures for the integration into Ukrainian society of persons recognized as refugees are conducted by international and Ukrainian charitable organizations, and state institutions such as employment centers, are involved in these measures on rare occasions.

### **Countering Discrimination**

According to the Methodology, the effectiveness of implementation of the “Countering Discrimination” reforms in Vinnytsia, Odesa and Transcarpathian regions is carried out at *average level*, while in Ivano-Frankivsk, Lviv and Kherson – *below average*. The reasons of the mediocre performance are the lack of awareness of local authorities with the objectives of the Action Plan to Implement the National Human Rights Strategy of Ukraine by 2020.

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<sup>12</sup> <http://zakon2.rada.gov.ua/laws/show/257-2017-%D1%80>

*An Integrated Regional Family Support Program, the prevention of domestic violence, equal rights and opportunities for women and men and the prevention of trafficking in human beings for the period till 2021 is being implemented in **Vinnitsia region**. During the first half of 2017, 35.4 thousand UAH were used to implement measures to prevent violence in families. In the Department of Social and Youth Policy of the Vinnitsia Regional State Administration, an Expert Council on Countering Gender Discrimination has been established. It considers the applications for advertising containing signs of discrimination. It is worth noting that information and awareness campaigns on counteraction to trafficking in human beings in Vinnitsia region are held, as well as measures to identify and provision of help to victims. The financial aid of 48 756 thousand UAH was paid to victims of trafficking in human beings from the regional budget.*

*In **Transcarpathian region**, DSA in Beregovo and Mukachevo adopted a regional program of family, demographic, gender policy, prevention of domestic violence and counteraction to trafficking in human beings, and allocated funds from the local budget for its implementation (in total 202 thousand UAH). The relevant program has been approved, but its funding is not implemented in the other DSAs of the region.*

*In 2017, **Ivano-Frankivsk and Lviv regions** do not provide funds for organizing and conducting awareness raising campaigns aimed at raising awareness among citizens in the area of prevention and counteraction of discrimination, the spread of gender knowledge and the elimination of gender stereotypes. No responses were received on this issue in Odesa region.*

*The Regional Program for Social Protection of the Elderly, Disabled and Family Support, Promoting Gender Equality and Combating Trafficking in human beings for 2015-2019 was adopted in **Kherson region**. According to the order of the chairman of Kherson Regional State Administration, the district state administrations are obligated and it is recommended to city committees of the region to make changes to relevant local plans and programs, providing financing of measures. In Vysokopillya, Kakhovka, Nizhni Sigorozy, Oleshky and Novovorontsov district state administrations, corresponding programs have been adopted, educational events are held in educational institutions, employment centers and libraries.*

*Certain categories of citizens, defined in the Law of Ukraine “On Free Legal Aid”<sup>13</sup>, have access to local centers and free secondary legal aid offices operating in each of the researched areas. They need to prove their involvement in the privileged categories of citizens in order to receive assistance, so there is no unhindered access to legal protection against discrimination. According to an expert of the Center “Women’s Perspectives”, local authorities in **Lviv region** do not have mechanisms of protection against gender discrimination, civil servants are responsible for this issue, and they often cannot identify the situation related to discrimination and cannot provide assistance to such a person.*

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<sup>13</sup> <http://zakon2.rada.gov.ua/laws/show/3460-17>

In accordance with the National Human Rights Strategy, people with disabilities should have access to health and education facilities. In most districts of the researched areas, health and education establishments are screened for their architectural accessibility. *Despite the fact that some institutions of health care and educational institutions are not accessible to people with disabilities, local authorities did not notify the plans for reconstruction of premises in accordance with the State Construction Standards of Ukraine and schedules of the corresponding reconstruction.* **Transcarpathian region** is an exception, where the *Plan of measures for creation of an unimpeded environment of persons with disabilities for 2017-2021* is being implemented, which provides a number of measures and appropriate terms for providing access to buildings and infrastructure. In addition, **Ivano-Frankivsk** implemented the micro project “*Available Ivano-Frankivsk*” within the framework of the “Smart Cities” concept of EU/UNDP “**Community Based Approach to Local Development Project Phase-III**”.

*In most regions, establishment of centers for victims of gender violence is not planned, although this is provided in the Action Plan to Implement the National Human Rights Strategy.* **Kherson region** is an exception, because there is a plan to establish a *Crisis Center for victims of domestic violence* on the basis of the vacated premises of the health care institution. The center and city centers of social services are actively involved in the establishment process of the center and support of 17 non-governmental organizations coalition. The opening of the Crisis Center is hindered by the deputies of the profile committee of the Kherson City Council, who do not make a decision to pass this project to the vote of the session of the city council.

It is envisaged to establish a *hotel-building for the supported integrated stay and accommodation of the most vulnerable categories of people, including victims of domestic violence* and the organization of legal and psychological support for them. It will be based on the Uniform Center for the provision of rehabilitation and social services **in Kolomyia, Ivano-Frankivsk region.**

*The overwhelming majority in the researched areas does not provide the organization of leadership schools for women and schools for the preparation of candidates for local council members.* An exception is *Rozhnyativ Regional State Administration of Ivano-Frankivsk region*, which plans to organize a school of leadership for women and a school for the preparation of candidates for local council members during 2018-2020 for the local budget, which are provided in the *district comprehensive program of social protection of the population*. The development of a program for supporting women’s business and the launch of a women’s business club with female non-governmental organizations is envisaged **in Kolomyia, Ivano-Frankivsk region.**

Among the weak sides of the implementation of the Action Plan for the implementation of the National Strategy on Human Rights, it should also be noted that there are no plans for the creation of information and consultation centers for migrants in all areas.

*In general, civic organizations do not record a significant reduction in cases of discrimination based on age, gender or sexual orientation during employment and at the workplace. And in Ivano-Frankivsk and Odesa regions, **the growth of such cases is recorded instead**. Expert of the NGO “Progressive Women” (Vinnytsia) believes that the number of cases of discrimination remained at the same level, but their character changed, as discrimination became more hidden and indirect.*

*Public events in support of the LGBT community were held in Kherson and Odesa regions. The police provided security measures to the participants of the action and safe leaving of the action. In Vinnytsia and Ivano-Frankivsk regions, public measures aimed at combating discrimination, in particular, marches of equality are not carried out due to the inability to ensure the safety of participants in these activities.*

Consequently, due to the low level of awareness of local authorities regarding the objectives of the Action Plan to Implement the National Human Rights Strategy, anti-discrimination measures are mostly informative. Some regions allocate funds from local budgets to appropriate measures, but according to civil society organizations they are not enough to significantly reduce cases of discrimination. All-Ukrainian and regional public organizations play a key role in promoting anti-discrimination ideas, implementing their activities with the support of Ukrainian and international donor organizations.

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