Ukraine: Promoting Integrity and Compliance among humanitarian aid organisations

Programme for Integrity and Compliance in Humanitarian Assistance I

Budget: 200,000 Euro (Czech MFA)

Duration: November 2024 – December 2025

Key objective: To reinforce integrity and compliance standards among local humanitarian organisations across Ukraine's regions

Key project activities

Since late 2024 PTF Europe – together with our Ukrainian partner CVU Odesa – has been rolling out the first phase of an intended three-year project to survey, train, mentor and network local humanitarian organisations in Ukraine in integrity and compliance.

This project, funded by Czech Development Cooperation with a budget of €200,000 per phase, builds upon the approaches and experience of our earlier Odesa-centred pilot projects in 2022 and 2023. It stands out for its training explicitly focused on integrity and compliance, making this approach truly distinctive within the sector.

Firstly, CVU Odesa conducted **structured interviewing of humanitarian organisations** from Odesa, Mykolaiv, Kherson and Chernihiv to assess current training needs. Interview results shaped the consecutive training. The training sessions were rolled out between May and July 2025 on the following topics:

- Integrity and compliance in fundraising and project management
- Integrity and compliance in communications and marketing in social networks
- Systemic approach towards anticorruption
- Financial management

Some **training sessions** had to be conducted in basement shelters amid missile and drone attacks on both cities. All were fully subscribed: trainers were impressed by the trainees' greater seriousness and competence in comparison with the first years of the war. More than 70 local humanitarian organisations participated in the eight 2-day training courses (4 courses for wider Odesa region and 4 courses for the Chernihiv region).

Several organisations reported initiating or accelerating reforms in documentation, ethics policies, and internal controls as a direct result of the training. Networking among organisations brought together in the training spurred joint initiatives or informal alliances, with some already formalising partnerships.

The training courses are to be followed through with **tailored mentoring** to further embed integrity and compliance standards within the participating organisations, based on organisation-specific capacity assessments. The best performers will receive grant support tied to elaborated work plans for further internal development. We look forward to expanding the project's reach to the Kharkiv and Dnipropetrovsk regions if the Czech funding is renewed beyond 2025.

Background

Local volunteer organisations are the backbone of humanitarian aid in Ukraine, however, they are chronically under-resourced. In the first year of the war thousands of such groups distributed mass emergency relief, most often using their own resources or ad hoc donations. Fewer in sheer number now, but with new start-ups continuing, local humanitarian groups have become more specialised, adapting to today's complex, long-term challenges. They are flexible, know how to reach into vulnerable, hard to access and front-line persons. This is unmatched by international or state actors.

Our project aims to help grow a swathe of local humanitarian organisations with strong integrity and compliance systems across Ukraine's regions. That way they are qualified to become fully-fledged partners with all relevant actors, including international grant-givers. Despite some advances secured by a campaign for 'localisation' of humanitarian aid in Ukraine, local humanitarian organisations have largely failed to access international humanitarian funding. They cannot meet donors' high compliance and due diligence thresholds and are faced with exclusionary vicious circles. Our project qualifies local humanitarian organisations to better meet integrity and compliance standards.

Our Implementing Partner

The Committee of Voters of Ukraine (CVU) Odesa implemented the project. The organization has since the late 1990s engaged in election training and monitoring, gradually expanding into broader democratization support. Over the past 15 years, it has created national NGO networks on its own account, independent of the national CVU organization. CVU Odesa coordinates the national monitoring projects "For the Transparency of Local Budgets" and "Performance Review of Local Council Deputies".

PARTNERSHIP FOR TRANSPARENCY EUROPE

Pilot Project: Promoting integrity among humanitarian aid organisations

Budget: 90,500 Euro, funded by PTF Europe (25,000 €) and Czech MFA (65,500 €)

Implementing partners: PTF Europe, BIRN, CVU Odesa

Duration: March – August 2023

Key objective: Training humanitarian volunteer organisations in integrity and compliance, case study on the feasibility of civil society

Between March and August 2023, PTF Europe – together with CVU Odesa (our Ukrainian partner) and the Balkan Investigative Journalism Network (BIRN) – implemented our second project in Ukraine. The project had two components: (1) to train humanitarian volunteer organisations in integrity and compliance standards and (2) to conduct a study on the feasibility of civil society monitoring of reconstruction at the municipal level.

The Russian invasion of Ukraine in February 2022 led to a great influx of humanitarian aid into the country as well as the emergence of many volunteer groups. However, many of these were unable to receive international funding due to complex integrity and compliance requirements. In response to this issue, CVU Odesa, BIRN, and PTF Europe assisted small- and medium-sized humanitarian volunteer organizations in improving their **basic integrity and compliance standards**. They conducted three **training courses**:

- Integrity and compliance in fundraising and proposal writing
- Effective communication in compliance with donors' integrity and compliance standards
- Integrity and compliance in the own organisation

53 persons from 19 humanitarian volunteer organisations took part. Following the training, CVU Odesa provided mentoring in fundraising/proposal writing and effective communications to local CSOs.

PTF Europe, CVU Odesa, and BIRN conducted a "**Study on the feasibility of CSO monitoring of reconstruction at the municipal level"**. The study provided an overview of the legal and institutional framework in which reconstruction takes place and analysed the opportunities and limitations for civil society to engage in reconstruction monitoring at municipal level. The key conclusion: Civil society should contribute to transparency, inclusivity and accountability in reconstruction by:

- monitoring individual reconstruction projects,
- innovating, improving and standardising municipalities' processes for transparency and inclusivity,
- taking over responsibilities in reconstruction (e.g. organising the consultation process).

Our Implementing Partner

Одеська обласна організація КОМІТЕТ ВИБОРЦІВ УКРАЇНИ

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PARTNERSHIP FOR TRANSPARENCY EUROPE

Assessing integrity and compliance among humanitarian aid organisations

Budget: 39,000 Euro (financed by PTF Europe and PTF US)

Implementing partners: PTF Europe, BIRN, CVU Odesa

Duration: September – December 2023

Key objective: humanitarian aid in Odesa – an assessment and a test for further action

This three-month pilot project, launched in the fall of 2022, sought to identify integrity and compliance issues among humanitarian aid organisations in Odesa, Ukraine. It was implemented by PTF Europe in partnership with the Committee of Voters of Ukraine (CVU) Odesa. The project focused on mapping compliance and integrity risks among 20 humanitarian aid actors, conducting in-depth interviewing.

Since the start of the war, around 80 volunteer groups had been active in Odesa, playing an instrumental role in delivering aid to people in need. However, these groups were often ineligible for funding from international donors due to complex and rigid compliance requirements, coupled with lengthy due diligence processes.

The study identified numerous corruption risks but found few proven cases. Nearly half of humanitarian aid in Odesa was coordinated by the Regional Military Administration, while the rest was distributed by volunteer organisations supported by a wide variety of donors. Only few bigger development organisations required compliance standards, while most smaller ones did not. Although some volunteer organisations reported following minimal donor requirements, none had systemic anti-corruption approaches in place.

The study also highlighted the limited localisation of international donor efforts. International organisations largely operated through their own structures and rarely collaborated with local initiatives. Many small volunteer groups, despite being highly effective during the first year of the war, struggled to sustain themselves due to lack of donor access, fundraising capacity, and long-term partnerships. Less than one percent of international humanitarian contributions had reached Ukrainian NGOs directly by late 2022, while parallel aid structures dominated by international actors risked disempowering local responders.

Corruption risks were identified at all levels: from grand corruption and clientelism in government, to inconsistent donor requirements, to embezzlement and fraud within humanitarian organisations themselves. Although wartime restrictions limited transparency tools, the project underlined the urgent need for approaches that strengthen local organisations, enable access to international funding, and ensure integrity in humanitarian assistance and reconstruction across Ukraine.

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