JANUARY 2026

RESILIENCE OF THE INFORMATION ENVIRONMENT IN TIMES OF CRISIS: RECOMMENDATIONS FOR KEY PLAYERS

MERIT FORUM 2025

IMS

MERIT Forum 2025 participants

Andrii Bystrov

Maksym Dvorovyi

Maksym Onopriienko

Anastasiya Ravva

Liudmyla Fedorchuk

Mariya Frey

Olga Iurkova

Yaroslav Yurchyshyn

The MERIT Forum is a component in **IMS's (International Media Support) Eastern Partnership programme REACH: Media partnerships for accountability and trust**, which is funded by the Danish Ministry of Foreign Affairs. REACH aims to contribute to a more democratic, inclusive, and resilient information environment. Through the MERIT Forum IMS will look to facilitate capacity sharing and professional exchange on media laws, policies and practices with EU legislation, in line with international standards and with a strong focus on a Human Rights-Based Approach (HRBA) and Diversity, Equity, and Inclusion (DEI).

You can find some information about Merit Forum 2025 activities here:

[Merit Forum 2025 | IMS](#)

[MERIT Forum exchange on media resilience | IMS](#)

[MERIT Forum 2025: Exchange in times of turbulence | IMS](#)

For suggestions and comments on the Recommendations, please write to Roman Kifliuk at rki@mediasupport.org

Who are we?

The MERIT Forum 2025 Project united experts from media, academia, civil society, government, and state institutions with the support of International Media Support (IMS) within the framework of the Eastern Partnership programme REACH: Media partnerships for accountability and trust, funded by the Ministry of Foreign Affairs of Denmark.

What did we do?

We collected and processed practical experience of institutions that work directly in the media environment and have a decisive influence on it, in the form of a guidebook "Resilience of the Information Environment in Times of Crisis: Recommendations for Key Players".

Why did we do this?

This guidebook is not just about Ukraine. It is about how to defend democratic societies during information wars that have been going on for decades and always lead to victims in real life. The guidebook will help not only to withstand a crisis but also to recover for further development.

Time is the most valuable resource that Ukraine did not have. Other countries do have it.

How is the guidebook structured?

We highlight the principal players who influenced the resilience of the information environment in Ukraine before, during, and after the full-scale invasion. We describe the signals of different phases for timely recognition and response, as well as the main tasks for key players.

Who will be interested in reading the guidebook?

We consider this guidebook a "must-read" for key groups that develop, adopt, and implement decisions in the context of safe and quality information delivery: European officials and regulators, professional media community, civil society and non-governmental organisations, academia, security and defence organisations, foundations, and partners.

Chapter 1. Indicators of Conflict Phases

The development of armed conflicts is accompanied by patterned changes in the information environment, which can be divided into three phases: before, during, and after the active phase of aggression. Identifying and understanding these signs early is critically important for the media, government authorities, civil society, and international partners. This chapter presents the main features of these phases and the changes that occurred, based on Ukrainian experience.

1.1. Pre-crisis phase: what happens within the information environment BEFORE the full-scale invasion

Before the start of an overt aggression, the information environment undergoes systemic changes aimed at preparing the society to accept or passively perceive future actions of the aggressor.

Main defining features of this phase
- Increase in the volume of disinformation. Significantly more fake messages appear in the media and social networks than usual. This is accompanied by the repetition of old disinformation messages in a form updated and adapted to the context.
- Testing new narratives. The aggressor launches "trial" information campaigns to assess the population's reaction – for example, circulating themes about "external governance" of the country, "conflict fatigue", or the "economic expediency of cooperation".

- Experimental targeted attacks. Provocative materials aimed at specific regions or social groups are injected into the information environment to reveal their vulnerabilities and protest moods.
- Discreditation campaigns. The aggressor conducts targeted work to undermine trust in key state institutions, the army, independent media, and the country's international partners.
- Strengthening the "soft power" abroad. The aggressor's cultural, educational, sports, and musical projects are activated via a network of cultural centres, business entities, and diplomatic missions. These activities create a positive image of the aggressor and form loyal communities, which will be used for information support of the aggression.

1.2. Active phase: what happens within the information environment DURING the full-scale invasion

With the beginning of direct combat operations, the information environment becomes one of the main arenas of war. The aggressor's goal is to establish control over the flow of information, deprive society of alternative sources, and impose its own interpretation of events.

Main defining features of this phase
- Physical elimination of media personnel. Cases of murder, abduction, imprisonment, and torture of journalists and bloggers are recorded, especially in areas of active combat and in occupied territories. Attacks on activists, citizen journalists, and politicians are organised in the country's interior.
- Destruction of media infrastructure. Targeted strikes occur on TV and radio towers, studios, newsrooms, server and technical hubs in order to disrupt broadcasting and access to news. The aggressor steals equipment and conducts cyberattacks on online platforms and cloud infrastructure.
- Information blockade in occupied territories. Disconnecting Ukrainian TV channels and radio, blocking Ukrainian internet resources, replacing them with the aggressor's media outlets, and saturating the local information environment with propaganda and fakes.
- Aggressive dissemination of propaganda. Use of controlled media, social networks, and AI-generated content to broadcast narratives beneficial to the aggressor, creating an "alternative reality" for the residents of occupied territories and the international audience.

1.3. Post-conflict phase: what happens with the information environment AFTER the full-scale invasion

After the completion of the high-intensity cycle of combat operations, the information environment transitions into a state of struggle in order to interpret the past and to shape the future. This is a time when the risks of disinformation remain high, even if the weapons fall silent.

Main defining features of this phase:
- Flourishing of revanchist narratives. Messages about the "necessity of reconciliation", "shared history", or "economic benefit" as an advantage of restoring relations with the aggressor, prevail.
- Orchestrated pluralism of opinions. The public discourse is filled with narratives where, alongside verified information, revanchist and disinformation statements are purposefully promoted under the guise of "balance" and "freedom of speech".
- Rewriting history. Campaigns begin, during which the events of the war are revised and distorted, aggressor's war crimes are downplayed or denied through media, educational programmes, and cultural projects.

Chapter 2. Key Players and Primary Tasks

In this guidebook, we consider the following to be key actors involved in developing, adopting, and implementing decisions to ensure safe, high-quality information: professional media community, civil society and non-

governmental organisations, academia, and regulatory bodies responsible for the media sector and the dissemination of information.

2.1. Professional media community

This material is based on the personal experience and management decisions made by Anastasiya Ravva (Espreso) and Mariya Frey (Suspilne), as well as surveys of colleagues from the media industry (LB.UA, Nakypilo, Hromadske Radio, Rayon.in.ua, Detector Media, 5 Channel, Women in Media, 1+1, Starlight Media, Eastern Point, Hromadske) as well as interviews with Maryna Synhaivska, Liza Kuzmenko, Viktoriya Yermolaieva, Oksana Davydenko, Ruslana Brianska, Iryna Herasymova, Maksym Sukhenko, Halyna Petrenko, Olena Leptuha, Nataliya Pakhaychuk, Anna Ovcharenko.

Timeframe	Tasks
Before	• **Create a cross-sectoral working group for crisis planning.** Involve senior managers of operational services, editorial and production teams, security units, and HR/employee support. This group should be responsible for anticipating scenarios and coordinating actions during a crisis. Examples: **Espreso** involved editorial leadership, technical teams and the administrative team during planning. **Suspilne** engaged both leaders from different departments and staff members with first-hand experience of working in conflict conditions since 2014 when developing scenarios. **A key challenge noted by colleagues** is the decisive role of team leaders in initiating this process, recognising its importance, and taking personal responsibility. **Viktoriya Yermolaieva:** "The leadership must be mindful of, and accountable for, what will happen to the team in a crisis. We should remember that responses to this level of stress are unpredictable, and the leaders of organisations must be ready to step in and do hands-on work when others are unable to". • **Develop future scenarios: model critical situations.** Examples: **Suspilne** developed three scenarios: expansion of combat operations in the east, an attack from Crimea, and an attempted seizure of Kyiv. **Espreso** worked with two scenarios: "Kyiv remains operational" / "Kyiv ceases to operate". **A key challenge noted by colleagues** was that the absence of scenarios meant there was no plan of action and teams were left disoriented, relying on exhausting situational leadership. **Olena Leptuha:** "A realistic crisis plan must exist. We have a first-hand example. At the end of January 2022 we had one, and implemented it by 70%. This did not stop the media group – on the contrary, we were able to launch the FM radio station "Nakypilo". • **Rehearse specific measures: check shelters, prepare evacuation routes. Appoint responsible staff members in case crisis response is needed.** Each scenario should specify: what we do, who makes decisions, and who is responsible for people. It is important to take stress responses into account: not all managers are able to work under extreme pressure. Examples: **Suspilne** checked the condition of its shelters and held standard safety drills.

A key challenge noted by colleagues was no designated staff members for preparedness, the absence of safe premises, and no security practices for teams.

Oksana Davydenko:
"I did not believe that something like this could happen – nor did thousands of others. We did not know what occupation was, and when we found ourselves in it, our psyche processed it like a game: people gradually disappeared and we did not know whether we would see them again. We were completely unprepared for this".

- **Provide first-aid and response training for office-based teams.**

Examples: Field teams of many Ukrainian media outlets have been attending such training since 2014. At the initiative of leaders, **Suspilne** began delivering training to teams starting in the summer of 2021. In 2020-2021, **Espreso** arranged for all staff, including administrative employees, to attend first-aid courses.

A key challenge noted by colleagues was that partners did not understand the importance of supporting this issue and, as a result, there was no funding available (teams covered the costs themselves).

- **Prepare back-up content production and broadcasting hubs.**

Examples: Suspilne: Lviv, Uzhhorod (potentially Warsaw). A few days before the full-scale invasion, a team travelled to the regional office in Lviv to assess what was needed to relocate broadcasting; on February 25th, 2022 broadcasting was relocated. During the spring of 2022, an additional broadcasting hub was launched in Uzhhorod. **Espreso:** Lviv and Warsaw (considered but not implemented). The Lviv office had been ready before 2022. Broadcasting was relocated to Lviv on February 25th, 2022.

A key challenge noted by colleagues was that at a critical moment not all crisis teams were ready to travel into the unknown with no understanding of how to set up work at new locations.

- **Ensure basic team safety:** body armour, helmets, first-aid kits, and clear rules for working in unsafe areas.

A key challenge highlighted by everyone was dangerous working conditions, especially in frontline-adjacent regions, and weak preparedness for supporting colleagues who found themselves instantaneously under occupation.

Ruslana Brianska:
"I really needed to be at the forefront of events, so when we moved my daughter out to a safe distance, we returned to work in Bucha. I could not imagine myself anywhere else at that time, even though I did not know how I would work in the new conditions".

- **Build partnerships with colleagues from other media outlets.** Getting to know and collaborating with regional newsrooms before a crisis makes cooperation during it much easier.

Examples: there are a number of events and initiatives in Ukraine that bring together high-quality and responsible media.

- **Update ethical standards.** Establish the rules for handling content in crisis and wartime conditions clearly: a ban on obscene language, dehumanising language, and publishing images of the dead and other traumatic content when there is no public necessity and appropriate context.

Examples: Suspilne has two self-regulatory bodies: an editorial council (reactive) and an editorial board (proactive). Before the full-scale invasion, the editorial council developed and approved recommendations on accurate coverage of Russia's armed aggression since 2014.

Liza Kuzmenko:
"In early March 2022, the Commission on Journalism Ethics (CJE) received a complaint about unacceptable language in the media, which was being circulated as a quotation from a well-known phrase used by the military personnel on Zmiinyi Island. I then drafted a response that the world we live in is not perfect, and thus we have to make very difficult decisions that may differ from the decisions we would make during peacetime. In reality, at that moment in time we supported journalists' reaction to everything that was happening around us".

- **Prepare alternative channels for information delivery.**

Add and develop new broadcasting platforms.

Examples: Espreso: rapid development of a YouTube channel, an agreement to access radio frequencies. **Suspilne:** a concept for SMS news distribution during prolonged blackouts.

A key challenge noted by colleagues was the lack of mechanisms to deliver content to audiences in frontline areas.

- **Develop clear and transparent rules for interaction between media groups for joint information delivery.** Agree on principles for crisis coordination in advance: exchange content and resources, rules for shared use of equipment/studios/offices as well as boundaries of responsibility to avoid chaos during emergency decision-making.

Examples: Ukraine's media community features strong horizontal ties that helped teams make decisions quickly based on previous cooperation.

A key challenge noted by colleagues was the lack of systematic cooperation for smaller media outlets.

- **Prepare stocks and reserves for uninterrupted operations.** Ensure back-up electric power and communications systems (generators, Starlink/back-up communications channels), basic stock of water/food, and sleeping arrangements for teams that may be relocated or forced to work long hours on site.

Examples: Espreso updated back-up power capabilities in advance and could keep the office running during blackouts, it had fuel and water reserves at its disposal. **Suspilne** had additional spaces in offices allocated for sleep, which were used by colleagues from frontline-adjacent regions.

	A key challenge noted by colleagues was maintaining real reserves for work continuity during prolonged outages and isolation, rather than "plans that look good on paper". • **Invest in international experience and study visits to countries that have experienced wars and crises.** Send managers, editors and journalists on work trips or study tours to countries with experience in crisis management, institutional resilience and media work under pressure (safety, ethics, countering disinformation, financial sustainability). This accelerates learning and minimises costly errors. **Example: Suspilne** sustains long-term cooperation with colleagues in Japan, who have a back-up broadcasting system in case of natural disasters. **A key challenge noted by colleagues** was the inability to move from "continuous patching and fixing" to long-term stability due to absence of alternative experience and standards that help shift quickly from reactive to systematic approach. **Halyna Petrenko:** "Challenges are increasing, so it still feels as though we are doing "band-aid fixes" rather than ensuring real stability".
During	• **Quickly relocate newsrooms (with particular attention to family members who are unable to care for themselves independently) and reconfigure production processes.** Media organisations must be ready to transfer newsrooms immediately to back-up hubs and to set up joint or temporary newsrooms. **Examples: Espreso:** on February 24th, 2022 Kyiv studio stopped broadcasting; the next day Lviv studio began operating, and the Kyiv team was relocated over the following days. **Suspilne:** on February 24th broadcasting continued throughout the day from Kyiv, on February 25th broadcasting began from Lviv. **A key challenge noted by colleagues** was relocating people and newsrooms quickly and safely without interrupting broadcasting or disrupting production processes. **Iryna Herasymova:** "At the beginning of the full-scale invasion, the entire 5 Channel team was effectively living in the office. We worked in shifts to provide round-the-clock news broadcasting". • **Introduce shared use of resources among media outlets.** Share equipment, offices, generators, vehicles and staff capacity, and create shared "pools" of field materials. **Examples:** During blackouts, **Espreso** opened its office to smaller media outlets or freelancers, providing them with access to electricity and internet. **Suspilne** coordinated resource use between regional newsrooms and brought specialists from other media into crisis teams. **A key challenge noted by colleagues** was organising rapid mutual support between media outlets without losing control, security or editorial autonomy in conditions of resource scarcity. • **Continuously monitor and strengthen the safety of field teams, and the procedures for working with staff who remain in occupied territories.** Security measures must be updated as threats evolve: armoured vehicles, modern personal protective equipment, additional training, and clear rules for operating in dangerous areas.

Examples: Suspilne regularly reviews field-team security protocols and engages partners in order to provide additional safety measures such as drone identification and neutralisation as well as armoured vehicles.

A key challenge noted by colleagues were profound changes in technology and warfare methods (drone warfare).

Maryna Synhaivska:
"The hardest part of being a manager is having your staff under occupation. Journalists are used to working in crisis conditions – they mobilise and "run on adrenaline". But remaining uncertain and uninformed about what is happening when your colleagues have come under occupation, when, at first, they are sending you what they can literally see from their window and then you lose the connection with them – that was frightening".

- **Ensure an operating mode for the complete loss of premises or severe infrastructure damage.** The newsroom should have an established action procedure in case offices are destroyed or seized.

Examples: After the liberation of **Kherson, Suspilne's** regional branch premises required a specialised inspection and clearance before work could resume; equipment stolen by the Russian Federation had to be fully replaced. Following an attack of the Russian Federation on **Suspilne's office in Dnipro**, the team had to quickly find new premises and rebuild the newsroom's operation from scratch. Damage to **Suspilne's office in Zaporizhzhia** forced a review of the team's working arrangements and an update to its technical support standards. A four-day blackout in Odesa made it possible to rehearse an updated work protocol for the regional team in such conditions. After significant damage to its office as a result of an attack by the Russian Federation, **5 Channel** switched to remote working for five days, maintaining uninterrupted broadcasting.

A key challenge noted by colleagues was the inability to predict the next target for destruction.

- **Regularly review management decisions and policies under wartime conditions.** Frequent editorial meetings make it possible to align approaches to content, language and visuals quickly, and to avoid chaotic or emotionally driven decisions.

Examples: Suspilne has two self-regulatory bodies: an editorial council (reactive) and an editorial board (proactive). The editorial board's role was to respond swiftly to non-standard requests from editors and to allocate responsibility for editorial decisions.

A key challenge noted by colleagues was the teams' emotional and physical exhaustion, which could lead to mistakes.

- **Take systematic care of teams' psychological wellbeing.** Pay attention to symptoms that may indicate emotional fatigue or physical exhaustion.

Examples: Suspilne organised monitoring of nutrition and sleep routines (including "mandatory meals"), temporarily hired a psychologist, and found partners to support retreats. **Espreso:** individual and group sessions with psychologists, retreats, and flexible schedules.

A key challenge noted by colleagues was a shortage of "standby" staff members and an increase in gender-based threats.

Olena Leptuha:

"Despite the difficult security situation in Kharkiv, we kept the team and continue to develop the team's professional skills. Feedback sessions, a flexible working schedule and mental support programmes have become what unites "Nakypilo" overall.

- **Respond to the human capital crisis.** Army drafting, migration abroad, injuries and burnout require unconventional solutions. Review the terms for working with field teams: insurance, self-assessment checklists, increased pay.

Examples: Suspilne: introduced staff self-assessment checklists and is reviewing the volume of content portfolios for core assets. **Espreso:** introduced retraining and internal career progression.

A key challenge noted by colleagues was people leaving the profession due to increased workload, and the need to retrain women for roles traditionally seen as male.

Liza Kuzmenko:

"In our project work, there is a rule of a fixed amount of funds allocated for activities to prevent professional burnout. Doing our work involves re-traumatisation, and recovery is necessary to continue functioning normally. We must recognise that during difficult projects people burn out quickly, and we have to insist that donors support measures to help teams recover".

- **Introduce staff rotation.** Long-running crises require rotational working arrangements and transferring remote tasks to safer regions.

Examples: Suspilne: the option of remote work within Ukraine for those who can do it, rotational reinforcement for frontline teams, and a roster-based approach to work in Kherson. **Espreso:** remote working for part of the team.

A key challenge noted by colleagues was retaining a stable, motivated and effective team without losing content quality and local presence.

- **Defend freedom of expression through joint efforts.** During war, the risk of restrictions on press freedom increases under the pretext of security. Collective media action helps to restrain these processes.

Examples: Ukrainian journalists join together to protect their rights and access needed for high-quality coverage of the course of the war.

A key challenge noted by colleagues is balancing security and freedom.

Maryna Synhaivska:

"When in January 2024 we all gathered for a conversation with international organisations, we all had concrete evidence indicating attempts at restrictions by state authorities. After that, the authorities understood that the media are heard and taken seriously – and the situation began to change".

	• **Maintain contact with staff members abroad.** Consider options for remote cooperation and involving them in international projects. **Example: Espreso** provided people who had evacuated abroad with new roles and responsibilities. **A key challenge noted by colleagues** was keeping a united team and shared standards in conditions of geographic dispersion and differing experiences of the war. **Halyna Petrenko:** "At Detector Media, we allowed team members to work from anywhere in Ukraine and the world". • **Expand international cooperation.** Supporting foreign correspondents, content exchange and translation into other languages strengthen international presence and support. **Examples: Espreso and Suspilne** cooperate actively with international media outlets and journalists. **A key challenge noted by colleagues** was that international visibility is an additional burden for small teams. • **Update cyber security protocols.** Insufficient cyber security is named by all media outlets as one of the systemic problems requiring constant attention. **Example: Suspilne** developed cyber security policies and guidance, and is developing its cloud infrastructure. **A key challenge noted by colleagues:** insufficient funding.
Future plans	• **Plan a phased return of teams to work in de-occupied territories.** Returns should take place only to areas under full state control, with separate safety and support protocols for regions that were under prolonged occupation. Such areas require specific plans for newsroom reintegration. **Example: Suspilne** developed the "De-occupation of Crimea" plan as a framework for work with audiences, staffing and content after the territory is liberated. • **Support the recovery of affected media outlets.** This includes both the physical restoration of infrastructure and support for teams that have lost premises, equipment or funding. Partnership programmes, recovery grants and resource sharing among media outlets are essential. **Example: Suspilne** is considering options for partial employment of journalists who work for multiple outlets. • **Introduce fast-track training and adaptation programmes for new professionals.** After crises and war, some media workers leave the profession due to traumatic experiences. Training and retraining programmes are needed, as well as adaptation programmes for people with experience of war, occupation or captivity who are returning to civilian life. **Example: Suspilne** developed their own full multimedia journalism course and made it publicly available for wide audiences.

	• **Regularly review and update ethical standards.** The post-crisis period requires a rethinking of editorial approaches that consider new experience, traumatic content, work with the memory of the war, and responsibility to audiences. • **Review business models for sustainable media development.** Plan financial resilience by combining multiple income streams.

2.2. Academia

This material is based on personal experiences of Liudmyla Fedorchuk, Candidate of Sciences (PhD equivalent), Associate Professor and Andrii Bystrov, a doctoral researcher at the Department of Online Media of the Educational and Scientific Institute of Journalism of Taras Shevchenko National University of Kyiv, as well as on the analysis of management decisions taken at the Institute. It also draws on an analysis of colleagues' experience representing Zaporizhzhia National University, Sumy State University and the Mohyla School of Journalism, and on interviews with Ihor Darmostuk, a lecturer at the Department of Online Media of the Institute of Journalism of Taras Shevchenko National University of Kyiv and Diana Dutsyk, Executive Director of the NGO "Ukrainian Institute of Media and Communication".

Timeline	Tasks

Before	• **Establish a crisis working group within the education institution.** Involve the administration of the higher education institution, the IT department, heads of departments, and the representatives of student government. The group should be responsible for coordinating the transition to remote learning and ensuring data preservation.
	
	Diana Dutsyk:
	"In the event of a full-scale war, the system of university education will face the following key challenges, as it did in Ukraine. In particular, these include challenges of:
	   – **a humanitarian nature:** large-scale displacement of lecturers and students from active combat areas to safer regions or other countries; the university must not only provide whatever support is possible for these people, but also establish appropriate communication systems in order not to lose contact with them, and not to lose its employees or students altogether in the future;
	   – **a financial nature:** during wartime the state's capacity to support education decreases, and students' ability to pay for their studies also declines; this affects lecturers' pay and all educational processes;
	   – **an organisational nature:** in particular, it is necessary to ensure that there is a plan to deliver a fully-fledged educational process in extreme conditions without compromising quality;
	   – **a psychological nature:** motivation to work and study under stressful conditions;
	   – **the destruction of infrastructure:** a significant number of higher education institutions in Ukraine have suffered varying degrees of damage over the years of war. Thus, there must be a relocation plan".
	
	• **Develop "higher education institutions' viability" scenarios.** Develop crisis response plans, strategic communications plans, and crisis management actions.
	
	Model situations: "Higher education institution's campus building accessible/Higher education institution's campus building seized or destroyed", "Connectivity available/Complete blackout".
	
	A key challenge noted by colleagues was bureaucratic inertia in higher education and the need for leaders who are willing to take on the responsibility for the safety of students and lecturers.

- **Modernise the curriculum:**
  - introduce the course "Digital intelligence and video verification" (OSINT);
  - introduce the course "War journalism and safety in combat zones", which should study Ukraine's experience (evacuation of higher education institutions, working under missile attacks, reporting from the battle lines);
  - introduce the course "Anatomy of enemy propaganda".

Example: "NotaEnota", StopFake

  - introduce a course on interviewing the victims of violence, former captives and traumatised children; working with sensitive content (trauma-informed journalism);
  - introduce a course on investigative journalism, including analysis of weapons procurement, tenders and databases;
  - introduce the course "Documenting war crimes".

Example: The Reckoning Project

  - introduce a degree pathway for war correspondents and press officers (studying the structure of one's own armed forces and the potential adversary), types of weaponry, accreditation rules, interaction with the military, basics of military censorship, filming at strike sites, planning trips to the frontline.

- **Deliver training for lecturers and students:**
  - training in risk assessment and first aid (HEFAT/TCCC). Example: 2402 Foundation;
  - training in journalists' psychological resilience. Example: 2402 Foundation;
  - training in digital and cyber security (secure messengers, stop using Telegram, using a VPN);
  - guest lectures featuring war correspondents with first-hand experience of working in war conditions in Ukraine;
  - implementing simulation exercises.

Ihor Darmostuk:
"Back-up communications channels and mobile stations are not a luxury, they are a part of an essential protocol. Higher education institutions must have encrypted messengers for coordination and offline resources for learning so that no missile can stop the intellectual development of the nation".

- **Prepare for teaching and learning during full-scale combat operations:**
  - prepare shelters and bomb shelters (water supplies, ventilation);
  - prepare back-up power for the educational process;
  - prepare back-up servers for information storage;
  - prepare alternative means of accessing the network;
  - equip universities with body armour, helmets, first-aid kits, and service vehicles with installed electronic warfare systems.

- **Develop partnerships with media and security organisations** that have extensive practical experience in war reporting: The Kyiv Independent, Suspilne, Espreso, Ukrainska Pravda, Hromadske.

During	• **Ensure continuity of education in extreme conditions** – delivering classes in shelters during air-raid alerts **Diana Dutsyk:** "It is important to review teaching methods taking into account all crisis factors (such as blackouts), as well as the needs and pace of the audience. This means that all classes should be designed not only for in-person or online delivery, but also with possible asynchronous study in mind. Equally important are lecturers' psychological qualities: in addition to the necessary knowledge and skills, they must be empathetic, flexible, and able to adapt quickly to any changes and to the audience's needs. This requires specialised preparation for lecturers; thus universities must either provide it themselves or create opportunities for lecturers to undertake training (for example, reducing workload while attending training, etc.)". – providing analytical input to inform government and media decision-making – developing updated educational programmes for accelerated workforce development **Ihor Darmostuk:** ""High-pressure" practice: learning should be aligned as closely as possible with the real needs of a time of crisis. In effect, Ukrainian higher education institutions have turned their students into war correspondents, drone operators for documentation, OSINT researchers, and public-safety communicators". **A key challenge noted by colleagues** was that the second semester (February-June) of 2022 was delivered online, yet graduates were still able to defend their theses and obtain their qualification documents. • **Document war crimes.** **Example:** The Reckoning Project • **Psychological support.** – introducing feedback sessions and mental health support programmes **Diana Dutsyk:** "Reduced motivation among students and lecturers is one of the main challenges during a prolonged war. This significantly affects learning outcomes. For example, most journalism faculty lecturers surveyed in 2025 by our organisation (Ukrainian Media and Communication Institute) noted a substantial decline in students' resilience to stress, "mood swings", and war-related apathy. This is accompanied by the lack of discipline and a purely formal attitude to completing assignments". – flexible deadline schedules for student volunteers or those in combat zones **Ihor Darmostuk:** "During the war, lecturers often became volunteers, psychologists, coordinators, and mentors. Their ability to sustain the educational process within superhuman conditions is a compelling model to follow: teaching professional ethics and service to society by their own example". • **Academic engagement:** – involving academic staff in disinformation analysis – studying information needs in frontline-adjacent and de-occupied territories – preparing reports for international partners

	– assessing the impact of war on the information environment **Diana Dutsyk:** "In Ukraine, as a result of certain historical circumstances, the universities have not traditionally been the main drivers of research and development in the field of media and information security; this role has often been played by analytical centres and non-governmental organisations supported by international partners. However, in recent years, scientists with strong research backgrounds have emerged – people who studied or undertook fellowships at Western universities. Therefore, cooperation between universities and analytical centres is highly important for research into media consumption, FIMI, media literacy, etc., which are greatly needed to strengthen the information security of a country at war. This approach will make it possible to build full-fledged research schools. But of course, this situation differs from country to country". – disseminating best practices of restoring a high-quality information environment – training specialists in solutions journalism • **Cooperate with media practitioners.** – organising guest lectures with war correspondents • **Scientists leaving the country and the army drafting of leading lecturers**
Future plans	• **Reintegration and restoration of the educational environment.** – returning to in-person learning, taking security zones into account – hybrid learning models for students who are forced to study remotely **Key challenge noted by colleagues** is organising the learning process during blackouts and air-raid alerts. Taras Shevchenko National University of Kyiv has been teaching in person since September 2023. Zaporizhzhia National University and Sumy State University must operate online to this day. **Ihor Darmostuk:** "Back-up communication channels: higher education institutions should have ready-to-use protocols to sustain teaching and lecturer-student communication even in the absence of stable internet or electricity (for example, using offline resources, mobile stations, generators, data exchange via encrypted messaging apps)". – establishing special adaptation programmes for students and lecturers returning from the front line – introducing inclusion programmes • **Institutionalising wartime experience** – revising academic standards at the state level to reflect new realities – updating textbooks and teaching guides by adding up-to-date case studies **Ihor Darmostuk:** holding academic conferences and publishing in English (for example, in the "Obraz" journal) so that the world could understand how the concept of a "crisis" is being transformed in the context of a modern war.

2.3. Non-governmental organisations

This material is based on the personal experience of Olga Iurkova and management decisions taken by the StopFake team, as well as a survey of colleagues from the NGO "Centre for Democracy and the Rule of Law", "Detector Media",

the Institute of Mass Information, "Internews-Ukraine", Ukrainian Media and Communication Institute (UMCI), Vox Ukraine, DII-Ukraine, "Make Sense", Media Development Foundation, "Lviv Media Forum", the Institute for Regional Media and Information (IRMI), and interviews with Oksana Romaniuk, Ihor Rozkladai, Diana Dutsyk, Liubov Rakovytsia, Svitlana Slipchenko, Yevhen Zaslavskyi, Anhelina Soldatenko, Otar Dovzhenko, and Nataliia Hanzha.

Timeline	Tasks
Before	• **Build an ecosystem of information resilience.** Fact-checking and OSINT organisations, cybersecurity organisations, media-supporting NGOs, partnerships, etc. **Examples:** After the beginning of the Russian-Ukrainian war in 2014, a number of grassroots initiatives in fact-checking, cybersecurity and OSINT emerged: **StopFake, InformNapalm, the Ukrainian Cyber Alliance**, etc. Countering disinformation was also taken up by organisations such as **"Detector Media", IMI, CEDEM, Internews-Ukraine, and UMCI**. This work, coupled with donor support, made it possible to develop a broad civil society sector in this field in Ukraine, with top-level expertise and the specialisation of individual organisations. They conducted research, awareness-raising and advocacy campaigns as well as training for different audiences. Guidance on critical thinking, news verification, etc. was developed. This helped to form a cohort of information-resilient citizens even before the invasion. **StopFake and VoxCheck** have established cooperation with Meta as independent fact-checkers in 2020. **Key challenge noted by colleagues** is insufficient attention to building the psychological resilience of audiences. It is difficult for a person to analyse information critically when they are afraid for their life and safety. • **Introduce systematic information and media literacy education for the country's population.** Goal: media and information literacy as a cross-cutting component of the education process at all levels, from nursery to higher education. Joint efforts with the state, including expert support. If the state does not do this, civil society can be the driver of the process. **Example:** school lessons on information and media literacy were developed within the project "Learn to Discern: Infomedia Literacy in Education", implemented by IREX in partnership with the Ministry of Education and Science of Ukraine and with the involvement of many non-governmental organisation and individual experts. They were introduced in more than 1500 secondary schools before the invasion. • **Create a system for monitoring and research into information influence.** Conduct regular research and monitoring to capture key trends, measure levels of media literacy, and identify the most vulnerable groups of the society. **Example:** key open-source intelligence products included the annual USAID-Internews media consumption surveys and Detector Media's Media Literacy Index. After the closure of the USAID in 2025, the research was carried out by Internews-Ukraine while preserving the methodology and ensuring comparability of the indicators. • **Develop organisational capacity.**

Introduce a functional division of management on CSO level, with clear roles across operational, programme and financial streams. Develop internal policies, procedures, risk-management systems, and accountability structures. Invest in organisational development: strategic planning, regulated processes, and leadership training. This makes it possible to not only survive in a crisis, but also to scale up activities, including participating in large grant programmes.

Example: over the past 20 years, donors have promoted the development of NGOs' institutional capacity, contributing to the establishment of sustainable management practices. As a result, a support market emerged, with clear rules and areas of responsibility, including in the media environment. After the invasion, it was precisely such organisations that were able to mobilise quickly. For example, IMI and MDF offered sub-granting schemes to support local media. Other NGOs also adapted while expanding their operations.

Yevhen Zaslavskyi:
"MDF had a diversified management system. It is a team of 15 people that includes an executive, operations, programme and finance directors. If individual staff members dropped out, this made it possible to cover for them. It was feasible for us to open a re-granting department and provide grants to local media".

Key challenges noted by colleagues. Financial: low salaries led to burnout and staff outflow. Institutional: the number of organisational development support programmes decreased at a critical moment, weakening the sector in the long term.

Anhelina Soldatenko:
"It is important to promote the development and professionalisation of NGOs more actively. Unfortunately, during the war there have been fewer such programmes in our organisation".

- **Ensure financial resilience and human capital.**

Pay particular attention to supporting the team – it is important to retain motivated and psychologically resilient staff, as people are the critical resource in a crisis period. Build a financial buffer that allows the organisation to manage for some time without grant funding. Work through operating scenarios in case of disruptions to the banking system. Support for these components is the foundation while project activities, partnerships and initiatives are the superstructure that can change.

Example: some organisations paid staff salaries several months in advance to minimise the risks associated with banking collapse or inflation.

Key challenge noted by colleagues is that access to banks becomes a risk in case of their occupation or communication outages.

Liubov Rakovytsia:
"We did not use the financial buffer, but it provided a sense of security".

- **Risk planning related to a potential crisis for NGOs.**

Develop comprehensive action plans for different types of threats – from technical disruptions to full occupation. These plans should include contingency plans, security protocols, teamwork maintaining algorithms, access to data, and external communications. Use the experience of previous crises, draw on the Ukrainian expert community, and regularly run simulations and stress tests. Take into account

scenarios with low probability but high potential impact – for example, occupation of non-frontline regions or loss of internet for several days.

Key challenge noted by colleagues was that plans were mostly short-term and did not foresee the realities of a prolonged war or unpredictable changes on the ground.

Oksana Romaniuk:
"We thought through the maximum number of risks. We worked through plans A, B, C, etc., starting with full occupation. In particular, disruptions to electricity, heating, water. In the fourth year of the invasion, these are exactly the challenges we are facing, even though they were not present at the beginning".

- **Develop options for relocating the organisation and the team.**

Develop two evacuation scenarios: short-term (first few weeks) and long-term (in the event of a prolonged war). Identify safe locations in advance – where there are partners, infrastructure or support. Where possible, ensure basic living and working conditions (accommodation, internet, communications, office operations).

Examples: many organisations had developed relocation plans in advance. Some rented flats in the west of Ukraine to accommodate the team. Teams that had experience of relocating from Ukraine's eastern regions in 2014 acted faster and more effectively. In particular, DII-Ukraine evacuated staff from Mariupol on February 22nd, 2022.

Key challenges noted by colleagues – decisions often have to be made in real time, with no clear algorithm. Smaller organisations lack the funds to support the relocation process.

- **Ensure alternative communication channels and access to data in crisis conditions.**

Set up technical infrastructure that makes it possible to stay in contact with the team even if mobile or internet connectivity is lost. Use several parallel communication channels, cloud storage, and offline backups. Assign responsible persons for communications' maintenance, create clear instructions and contact lists. Pay particular attention to communication with employees in regions under threat of occupation or blockade.

Examples: DII-Ukraine developed a communications system for staff members in higher-risk areas in advance. Other NGOs made hard-copy backups of critical documents and designed internal instructions in case of a complete loss of online access.

Ihor Rozkladai:
"We made backups of all saved information in case we could not get into the office. On the very first day we were hacked – everything on the website was wiped out. We were able to restore the website only because we had backups".

- **Conduct a security audit and develop security protocols.**

Assess all risks to the organisation's physical and digital security, the team and the offices. Based on the audit, develop protocols for: cyber protection (two-factor authentication, access management), physical security (premises assessment, evacuation plans), team structure (communication groups,

		division of responsibilities). Provide training in first aid, digital hygiene, and emergency response. Avoid tying critical processes to a single person.
		Oksana Romaniuk: "We hold safety training for journalists and thus tested all the approaches we recommended to organisations, ourselves. We conducted a security audit of our communications and technical equipment, assessed the office for resilience – whether a spy could get in. We worked through routes out of Kyiv, back-up communication channels. We split the team into groups of five people who keep in touch with each other".
During		• **Reassess operational priorities in the context of the full-scale war.**
		Quickly assess the relevance of existing projects and recalibrate activities to fit the new conditions – focusing on areas that directly affect the information-related, physical and emotional resilience of the society. Do not spend resources on activities outside the organisation's area of expertise. Use the organisation's strengths that are most effective in a time of crisis.
		Examples: StopFake and VoxCheck focused on prompt fact-checking of information about the course of the war that could affect people's lives and wellbeing. IMI suspended its regular projects and, for six months, operated like a logistics company to support journalists: evacuations, medical treatment, and procuring body armour. LMF focused on international communications and strengthening quality media outlets. The National Union of Journalists of Ukraine (NUJU) began providing support to relocated newsrooms.
		Oksana Romaniuk: "We immediately shifted into a working mindset. On the second day we started calling donors – we told them we were reformatting our work. All project funds, including our salaries, were directed to support journalists. Then we reported on it".
		Key challenge noted by colleagues was that reorientation requires not only flexibility, but also high psychological resilience of leaders and the ability to make strategic decisions amid chaos, uncertainty and pressure. An additional risk was moving beyond one's own expertise, which sometimes led to inefficient use of resources and loss of focus.
		• **Change to a remote or hybrid work mode.**
		Ensure that teams can work to full capacity in a remote or blended format. Come up with technical and organisational solutions in order to operate under unstable connectivity and energy supply. Such solutions may include purchasing charging stations, renting co-working spaces in safer regions, creating cloud-based working environments, and having tools for internal communication and support.
		Examples: organisations like StopFake had introduced remote or hybrid working formats earlier and thus were better prepared to operate during the full-scale war. More specifically, they could quickly allocate resources, ensure continuity of work, and support team mobility in case of relocation.
		• **Ensure psychological and infrastructural support for teams.**
		Provide basic infrastructure necessary for work (co-working spaces, charging stations, equipment), maintain continuous contact among team members, and create space for informal exchange, mutual support and stress reduction.

Examples: NGOs invested in technical resources – purchasing charging stations and laptops, and renting co-working spaces in relatively safe regions. MDF engaged psychologists to support employees. "Women in Media" modified an existing psychological support programme to the conditions of the full-scale war by expanding it and continuing work on emotional self-support for women journalists in crisis conditions.

Oksana Romaniuk:
"What helped was that we had developed a communications system. We communicated very quickly in a chat – not only about work, but also sharing emotions and news. For the first two days we held a group call every three hours. It was very supportive".

Key challenge noted by colleagues was the lack of funding for systematic psychological support for NGO staff. This area requires greater attention from donors, given high levels of burnout in the sector.

- **Establish internal resilience and strategic management.**

During a prolonged crisis, strategic management becomes a critical factor for survival. It is necessary to build resilient management structures, invest in team development, update policies and processes, and automate routine tasks. This enables NGOs to remain effective, scale up, maintain focus and respond to new challenges.

Example: MDF organised project management and fundraising courses, and provided individual support to staff members. "Make Sense" introduced training on digital, physical and psychological safety, updated policies, and standardised documents. IRMI expanded its network of partners, modified management, and developed new programmes and methodologies.

Key challenge noted by colleagues – a shortage of resources for institutional development, along with team reductions and burnout, complicates the implementation of strategic changes and a return to pre-crisis operational capacity.

Liubov Rakovytsia:
"Besides a roadmap of what we do today or tomorrow, it is important to have a strategic vision – what are we doing this for. This matters both for the team and for the donor organisations. For us, one such guiding objective became creating a network of relocated media outlets that continue operating even if a part of the newsroom remains under occupation. We don't know whether these efforts will come to fruition, but we believe it is necessary".

Nataliia Hanzha:
"Introducing the role of Digital Director within the team has helped us to structure all processes and automate routine tasks. This reduced the volume of manual, repetitive work by around 70%".

Anhelina Soldatenko:
"Since 2022, our programmes have helped dozens of local newsrooms from frontline-adjacent territories to strengthen their work with audiences. Additionally, we evolved ourselves: we changed our management and communications, developed new programmes and methodologies, and adopted modern technologies".

- **Embed adaptability and flexibility.**

Regularly reassess the external environment, plan operations flexibly, and be ready to change focus, working formats and funding sources quickly. This includes diversifying income, launching new products, discontinuing outdated directions, reviewing staffing, and expedited planning.

Example: "Make Sense" diversified its activities by launching commercial courses, consultancy products and new content formats as well as adapted projects to wartime realities and changes within the sector.

Key challenges noted by colleagues were a sharp reduction in international funding due to the termination of the USAID programmes, and staff shortages.

Nataliia Hanzha:
"At the end of 2025 we reflected a lot, and metaphorically the year can be described as a kayaking trip down a turbulent river: you seem to be moving forward, but each water rapid changes your trajectory. Simultaneously, we felt the lack of resources, the loss of a part of the team, and overall exhaustion in the sector. Although we had long had back-up plans – B, C, D, E – and were actively working on income diversification, it was the cancellation of USAID that became a blow that could not have been foreseen".

- **Consolidation with other NGOs and initiatives.**

It is important not to act in isolation, but to combine resources, expertise and audiences. Local self-reliance, horizontal links between large and small initiatives, joint content production, and coordination at regional and national levels increase the sector's resilience and the effectiveness of its impact. If such a tradition doesn't exist, it is worth developing protocols and agreements on cooperation formats.

Examples: with donor support NGO Smart Angel engaged a number of NGOs in a comprehensive awareness-raising campaign aimed at broad audiences. More specifically, the programmes "Antizombi" and "Grazhdanskaya oborona" were created for ICTV – emotionally driven Russian-language content tailored for viewers who typically watched Russian TV series. This made it possible to engage audiences through familiar formats and increase trust in Ukrainian sources. Fact-checking and other organisations coordinated swiftly via the Centre for Strategic Communications and Information security and the NDI Disinformation Hub. Coordination regarding the statements countering disinformation at the international level took place within the "Mediarukh" initiative.

Key challenge noted by colleagues – the lack of coordination, system-wide approaches and mechanisms for expanding the most successful practices prevented information-resilience programmes from reaching all vulnerable audiences.

- **Consolidation with the state and key stakeholders.**

In times of crisis, NGOs can and should remain independent critics of state policy, while also acting as partners in addressing shared challenges. This primarily concerns information security, strategic communications, risk analysis and support for societal resilience, as well as assistance in regulatory drafting. It is especially important to establish cooperation with security agencies and military institutions, because without such cooperation, strategic communications and protection of the information environment remain vulnerable. Such cooperation involves data exchange, joint action, coordination, and analytical support to enable evidence-based state decisions.

Examples: StopFake, CEDEM and other organisations shared information on Russia's genocidal rhetoric with the Centre for Strategic Communications and Information Security. Joint chats operate for quick ad hoc coordination among NGOs, media outlets and state agencies. NGOs also flagged to the state and donor organisation harmful social-media campaigns, anonymous accounts, shortcomings in platform content-moderation mechanisms, initiated research, or proposed topics for analysis. A notable example is Kharkiv Media Hub, within which regional authorities and security institutions cooperate with NGOs to support and assist journalists.

Key challenge noted by colleagues is that cooperation with the state remains unsystematic. There is a significant shortage of mechanisms for sustained coordination, especially amid new threats such as the dissemination of propaganda via AI-generated accounts, which international platforms are unable to address. This requires both government capacity and mobilisation of civil society expertise.

Ihor Rozkladai:
"Even if, as an NGO, you are in a certain opposition to the authorities and security services, it must be understood that during war we have a common objective – sustaining the state. We reported harmful activity and helped restore accounts. This is an element of our cybersecurity".

- **Continue and further develop monitoring, fact-checking and analytics.**

Even with state centres such as the Center for Countering Disinformation, the role of civil society remains critical. NGOs provide transparency, public visibility and trust in analytics, respond faster, and have flexibility in topics and methods. Their work complements state efforts and is an integral part of information resilience.

Examples: StopFake and VoxCheck continued daily fact-checking and narrative analysis, Detector Media and IMI continued media monitoring activity. Their data are regularly used by journalists, international organisations, governments and citizens for better understanding of the developments in the information environment. NGOs also initiate targeted research into specific aspects of the information environment and impacts.

Key challenge noted by colleagues is the need for consistent funding for independent monitoring initiatives.

Diana Dutsyk:
"The state Center for Countering Disinformation does its job, but much of its work is internal and not routinely published. Civil society works in the open".

- **Continue public outreach on media literacy.**

Work with audiences must remain uninterrupted, especially under conditions of high vulnerability to information attacks. NGOs play a key role in developing critical thinking, information-verification skills and understanding media processes. While state support is decreasing, it is important to preserve and develop such initiatives with donor support and partnerships.

Example: most of the surveyed organisations continue implementing educational programmes, training and media literacy campaigns in various regions of Ukraine, including for vulnerable groups and youth audiences.

	Key challenge noted by colleagues was a decline in state and donor prioritisation of this area and the risk of losing the established initiatives. Strategic donor support is required to ensure long-term impact.
Future plans	• **Continue monitoring and fact-checking as the basis for decision-making.** Systematic tracking of the information environment and fact-checking are key tools for the timely detection of disinformation, trend analysis, and informed decision-making. It provides the foundation for strategic planning, adapting communication approaches, and designing interventions that reflect current situation. Excessive focus on a "post-war period" should be avoided; instead, planning should be guided by the realities of a prolonged conflict. **Diana Dutsyk:** "When we talk about a post-war period, we create false expectations. We need to make plans for a year or two, on the assumption that the war will continue". • **Record and reflect on the experience.** It is important not only to act, but also to reflect on events, collect testimonies, and document processes. Such a chronicle will form the basis for analysis, learning, and policy-making. Reflection helps preserve meaning, draw conclusions, and adapt more effectively. **Liubov Rakovytsia:** "Each year we try to make sense of our experience during Donbas Media Forum. Keeping this chronicle is very important so that, when everything ends, we can reflect and identify lessons learned". • **Study and apply international experience of post-war adaptation.** Even now, it is already worth examining examples from other countries that have experienced war and translating them into the Ukrainian context. It is especially important to work on mental health, trauma recovery, social reconciliation, and preventing renewed conflict. This also implies legislative changes – in particular, developing an appropriate regulatory framework, such as legislation on collaborationism. • **Develop innovative approaches that enable a shift to preventive work on information influences.** Civil society in Ukraine already works effectively in a reactive mode: exposing fakes, developing media literacy, and conducting monitoring. The next step in this direction should be a transition to a proactive model: identifying threats at early stages, producing anticipatory analytical outputs, and developing new formats for engaging audiences that increase resilience to manipulation. This requires innovative thinking, interdisciplinary approaches, and strategic vision. • **Continue outreach efforts and the development of media literacy.** Outreach initiatives should not only respond to threats, but also build society's long-term capacity to think critically, analyse information, and understand how media outlets operate. This requires strategic thinking, consistent work with different audiences, and the ability to adapt both format and language to new challenges. **Key challenge noted by colleagues** is that Ukrainian NGOs demonstrate high effectiveness in crisis conditions, but require greater support and institutional capacity for long-term, stable operations.

Diana Dutsyk:
"While the war continues, it is important not to lose the society. We cannot afford gaps within the information environment. All this must happen continuously; otherwise, even more propaganda and destructive political forces will enter this space".

Ihor Rozkladai:
"Part of the sector must reconsider its role: whether it should transform, change focus, become more active in the regions, or enter government".

- **Institutionalising civic and citizen engagement.**

Volunteering and other forms of civic and citizen engagement that expanded during the war should be supported and transformed, and should play an important role in the country's post-war recovery.

Anhelina Soldatenko:
"Together with the media, NGOs can do a great deal to counter disinformation, mend social fractures, and strengthen social cohesion".

- **Supporting journalists and activists returning from the frontline.**

Create conditions for reintegration, and offer such forms of work engagement that take into account the frontline experience while helping to avoid re-traumatisation.

- **Moderating the demand for justice.**

In the post-war period, the demand for justice will inevitably increase – both in regards to accountability and the expectations of social change. NGOs play a key role in shaping an honest, open discussion and in preventing radicalisation and polarisation. It is important to prepare communication strategies to address this demand constructively in advance.

- **Developing security protocols in case the situation escalates in the context of future elections.**

Future elections may be accompanied by growing populism, radicalisation, and threats to the civic sector. NGOs should prepare action scenarios for crisis situations in advance – both in cybersecurity and in the physical protection of teams. This includes standard protocols: risk assessment, data protection, vetting of new employees, updating evacuation plans, security training, and establishing contacts with law enforcement authorities.

Ihor Rozkladai:
"If a "witch-hunt" begins, you will need an action plan – from the worst-case to the best-case scenario. Cybersecurity will also be under attack. Security skills must be refreshed and applied thoroughly".

2.4. Regulation

This material is based on the personal experience and management decisions made by Yaroslav Yurchyshyn, Member of Parliament and Chair of the Verkhovna Rada Committee on Freedom of Speech, and Maksym Onopriienko, a member of the National Council of Ukraine on Television and Radio Broadcasting; on an analysis of the decisions taken by the Government, ministries and other state institutions as well as the survey of colleagues: Hanna

Krasnostup, Director of the Department of Strategic Communications and Promotion of Ukrainian Culture at the Ministry of Culture of Ukraine, Oleksandr Burmahin, a member of the National Council of Ukraine on Television and Radio Broadcasting, and Oleksandr Obodovych, Head of the Media Affairs Unit at the State Committee for Television and Radio Broadcasting of Ukraine.

Timeline	Tasks
Before	• **Assess the main channels and narratives that could be used by the representatives of the aggressor state.** Executive authorities should carry out analytical work to identify media and other actors that will disseminate narratives constituting an abuse of freedom of expression, or those that fail to take appropriate measures to limit such dissemination. Additionally, narratives that may be used to reduce the population's cognitive resilience should be systematised as a separate category. **Examples:** In 2017, Russian social networks were identified as actors that were taking insufficient measures to curb hate speech and unlawful calls, and thus were banned by a Decree of the President of Ukraine. Since 2021, several institutions have been established to counter disinformation and develop strategic communications. On March 11th, 2021, the Center for Countering Disinformation was created within the National Security and Defense Council of Ukraine, and on March 31st that year the Centre for Strategic Communications and Information Security was established within the Ministry of Culture and Information Policy. This immediately generated a degree of competition and a need to coordinate the centres' work, which was addressed at later stages. Since 2014, provisions have gradually been adopted to restrict propaganda of the communist regime, glorification of the aggressor state, etc. **Key challenge** is the coordination between government and non-government actors in countering disinformation and implementing strategic communications. • **Develop legal provisions that would enable an appropriate response to key narratives and restrict the activity of the main channels used to disseminate such narratives.** Agencies empowered to initiate legislation, should adopt legislative provisions that grant regulators and other public authorities the ability to counter hostile channels of information dissemination and hostile narratives. At the same time, this legislative framework must take account of international human rights protection standards, in particular the European Convention on Human Rights (ECHR) and the International Covenant on Civil and Political Rights (ICCPR), including their provisions on the abuse of freedom of expression – specifically Article 17 of the ECHR and Article 20 of the ICCPR, which restricts hate speech and the propaganda of war. **Examples:** In 2016, Ukraine introduced restrictions on the retransmission of television channels whose content contravenes the requirements of the European Convention on Transfrontier Television, enabling the National Council of Ukraine on Television and Radio Broadcasting to consistently restrict the activity of more than 80 Russian TV channels. Another example is the restriction on the use Ribbon of Saint George, which was introduced in 2017 – this enabled the removal of one of the symbols of the Russian regime from public spaces. **Key challenge** is maintaining a balance between countering disinformation and propaganda and protecting freedom of expression.

- **Create an algorithm for introducing additional restrictions after the onset of a crisis and for gradually lifting them once it ends.**

In order to ensure compliance with international standards, additional regulation should be properly calibrated to various stages of a crisis, depending on their level of danger. Any legislative mechanisms that are introduced, must provide for the procedure to bring such provisions into force as well as terminate them. These mechanisms may require either a decision of the legislature or a decision of the regulator.

Examples: After the start of the full-scale invasion, the new Law of Ukraine "On Media" provided that Section IX (dedicated to restrictions relating to the aggressor state) would remain in force until the aggressor-state status is lifted and during a transitional period thereafter. This made it possible to restrict – promptly and, crucially, lawfully – the aggressor state's ability to use media resources for propaganda during martial law. At the same time, unclear timeframes for lifting emergency measures generate distrust and create a risk that restrictions could be used for political purposes in the future.

Key challenge is setting clear statutory time limits on restrictions in order to reduce distrust about possible abuse in the future.

- **Introduce mechanisms for appropriate support of media outlets – both financial and infrastructural – to ensure they can continue operating during a crisis.**

Government authorities should be prepared for infrastructure collapse following the emergence of a crisis situation. To help media fulfil their function of informing the public about socially significant events, authorities should prepare a range of financial and infrastructure solutions that reduce pressure on media as businesses if a crisis situation arises.

Examples: During the pandemic, the National Council of Ukraine on Television and Radio Broadcasting created a content-exchange database intended to help regional broadcasters fill airtime when they have minimal resources to produce their own content. This project continued during the full-scale invasion. Digital security belt: in 2021, the roll-out of digital terrestrial television was completed in frontline-adjacent areas of Donetsk and Luhansk regions and near Crimea, enabling broadcasting on 11 local multiplexes. A symbol of this effort was the 150-metre tower in Komyshuvakha, which strengthened the Ukrainian signal in the disengagement zone. Financial support for broadcasters: on the initiative of the National Council, the government reduced the licence fee by 70% for providers of programme services in border areas and in territories with a special broadcasting format, encouraging broadcasters to operate where market conditions were too challenging. Temporary broadcasting permits: the regulator actively issued permits for broadcasters in frontline-adjacent and border regions, ensuring the presence of the Ukrainian signal even in difficult conditions.

Key challenge is the lack of funds due to the prioritisation of security expenditures, leading to reliance on non-state sources of funding. Need for cooperation among the authorities, business entities and international partners to support the media sector.

- **Conduct training for journalists, editors and media professionals on providing public information.**

Authorities at all levels should openly discuss and declare standards for covering crisis and traumatic situations in cooperation with editorial offices and newsrooms.

	Examples: Recommendations for journalists: even before the invasion, the National Council worked with media professionals, steering them towards responsible public information and preparedness for crisis situations. This later led to the development of recommendations on psychological support for journalists and guidance on working with traumatic content. With the support of OSCE projects in Ukraine, a handbook on information hygiene and cybersecurity for media was produced cooperatively by the National Council, the Verkhovna Rada Committee on Freedom of Speech, and the Security Service of Ukraine. Online trainings "Don't Panic. Inform Responsibly": a series of trainings for journalists from all regions was organised, offering knowledge on how not to amplify panic and how not to succumb to it during emergencies. **Key challenge** is the need to create a platform for rapid analysis of existing and potential challenges and for developing support programmes. Cooperation with international partners to allocate funding in order to pilot such programmes and then transfer them to state or non-state partners. **Hanna Krasnostup:** "Media literacy is the foundation of society's resilience to information threats. More funding should also be allocated to implement information policy, including foreign-language broadcasting". • **Develop protective infrastructure and build reserves.** This includes both strategic signal delivery and transmission facilities (Concern of Broadcasting, Radiocommunications and Television) and each individual office of a state institution. **Examples:** Modernising the alert system: the National Council implemented outreach activities among radio broadcasters on installing special technical equipment to transmit air-raid alerts via broadcast programming. This became an important element of the future centralised public warning system. Creating shelters and back-up offices: the regulator readied shelters, evacuation routes, fire safety measures and first aid provision. This also included updating action algorithms, establishing a crisis team, setting up a remote office to ensure continuity of operations, arrangements for preserving/destroying documents and servers, and ensuring power supply and communications. **Key challenge** was the lack of funds and, as a result, low prioritisation of protective infrastructure development by the state. **Oleksandr Burmahin:** "Establish security protocols with action algorithms for different scenarios (what a particular state agency does, what they must do jointly, what, who, when and how depending on circumstances). Practising these protocols in real life, not treating them as box-ticking paperwork. A particular focus should be on resilience and viability, on protecting broadcasting infrastructure (radio, TV), on ensuring internet availability, including satellite capabilities".
During	• **Decide swiftly about introducing additional restrictions on freedom of expression when crisis situations arise.** Immediately after the onset of a crisis, the relevant government authorities should decide to activate the pre-developed algorithms and to bring into operation the provisions aimed at strengthening the state's information security. **Examples:** Despite the ad hoc nature of the relevant powers, on the first day of the full-scale invasion the National Council of Ukraine on Television and Radio Broadcasting held a meeting and decided to allow licensees to derogate from their licence conditions, in order to protect them from breaches and subsequent regulatory response measures. …In addition, during the first few days the National Centre

for Operational and Technical Management of Electronic Communication Networks decided to block Russian autonomous systems (AS), which made it possible to restrict the Russian segment of the internet among Ukrainian providers.

Key challenge is providing legal safeguards for such ad hoc decisions and explaining their necessity to international partners.

- **Respond to new narratives and related dissemination challenges, including through legislation.**

During a crisis – especially one caused by full-scale aggression – there is a significant risk that the other party to the conflict will change tactics and narratives. Throughout the crisis, continuous monitoring of the information environment and analytical work are needed to identify tactics used to disseminate unlawful content, and the regulatory framework should be updated in a timely manner to respond appropriately.

Examples: During Russia's full-scale invasion, Verkhovna Rada of Ukraine adopted a number of new laws constraining the dissemination of propaganda by Russia's totalitarian regime and propaganda promoting Russia's imperial policy. The use of the Telegram app was also restricted within government institutions. With the adoption of the Law "On Media", a decision was made to establish a List of On-Demand Audiovisual Services of the aggressor state, which is full of services that distribute pro-Russian content.

Key challenge – the aggressor state's continuous adaptation to restrictions, and the authorities' reluctance to clamp down on communication channels, such as social networks subject to Russian influence.

- **Analyse the lawfulness of imposed restrictions and decisions.**

During the first weeks of a crisis, a risk may arise that chaotic additional rules will be introduced, creating double liability for the same act, as well as rules that become irrelevant or create risks of excessive restrictions due to overzealous enforcement. To mitigate this, the legislature and the regulator should continuously assess how well legal rules correspond to the crisis situation and adjust them accordingly.

Examples: Order of the Commander-in-Chief No. 73, which introduced colour-coded zones for journalists' work, was widely criticised because it prevented media access to some areas where there were no active combat operations. Following pressure from the journalistic community, the provisions of the order were amended. In the fourth year of the full-scale invasion, issues also arose related to the proportionality of limiting content such as films featuring actors from the so-called "black list", when bans affected both well-known Hollywood films ("The Terminal", "Tenet", etc.) and classics of Ukrainian cinema ("A Prayer for Hetman Mazepa").

Key challenge is the authorities' tendency to implement measures without consulting the professional community, which can lead to contentious decisions or measures of limited effectiveness.

- **Activate the developed mechanisms to protect the rights of media outlets and journalists.**

Russia has identified media outlets and media employees as one of its priority targets for pressure and attacks. According to the Institute of Mass Information, since the start of the full-scale invasion Russia

has committed 870 crimes against media (as of December 2025). 124 journalists have been killed by Russian armed forces, and at least 26 civilian journalists are in captivity. Against this backdrop, journalists' working conditions in Ukraine have deteriorated: access to information has become more difficult, and damaging practices such as "lists of journalists" are re-emerging (the Mindich back-office case), among other issues. There is a need to prioritise prevention and investigation of cases involving crimes against journalists and intimidation of the media.

Examples: Hearings on high-profile cases against journalists are periodically held under the auspices of the Verkhovna Rada Committee on Freedom of Speech, and a working group has been established to develop legal mechanisms to counter SLAPP lawsuits. A group within the Office of the Prosecutor General previously worked actively on cases involving offences against media professionals and civil society activists, but now requires renewed momentum. A Temporary Investigative Commission has been established in the Verkhovna Rada to investigate crimes committed against journalists by Russian occupying forces.

Key challenge is the absence of effective mechanisms within international humanitarian law to protect civilians in general and media representatives in particular. A perception exists by some officials in Ukraine of journalists (especially investigative ones) as competitors and adversaries to be challenged.

- **Intensify efforts to ensure accountability for actors committing offences linked to abuse of freedom of expression.**

Appropriate accountability must be ensured – both nationally and internationally – for actors who disseminate, or fail to counter the dissemination of, content that constitutes an abuse of freedom of expression. National law-enforcement authorities must act to achieve this goal, while other state institutions should pursue diplomatic efforts to apply sanctions or mechanisms of international criminal law.

Examples: The EU and EPRA: as early as on February 25th, 2022, the National Council appealed to the European counterparts to take Russian channels off air. This became a catalyst for sanctions in the Baltic states, Poland, Romania, Great Britain, and ultimately for the EU ban on Russia Today and Sputnik. The regulator consistently raised this issue during international forums (EPRA, ERGA, the Council of Europe, OSCE, UNESCO), insisting on banning Kremlin broadcasters.

Satellite challenge: Russia repeatedly interfered with the satellite signals of Ukrainian TV channels via Eutelsat and Astra transponders. More than ten attacks were recorded, in which Ukrainian signals were replaced with propaganda broadcasting. The National Council appealed to Arcom (France), SES Astra (Luxembourg), and international organisations (ITU, UNESCO, the European Commission) to stop the aggressor's unlawful actions. Some channels had to be moved to other satellites. List of appreciation: the National Council compiled a list of "Ukraine's media friends" – regulators, channels, providers, and radio stations that blocked Russian propaganda and aired Ukrainian programming. Examples include the availability of Ukrainian channels in more than 20 countries and the launch of Ukrainian-language programming in Poland, Lithuania, Canada and Japan.

Key challenge is ensuring continuous monitoring of new approaches used by the aggressor state within the information environment and the limited readiness of Western democratic countries to impose restrictions in response.

Oleksandr Obodovych:
"Do not delay making difficult and bold decisions here and now because of political/economic concerns, adhere to the principle "one for all and all for one", otherwise it may be too late".

- **Provide more support for media operations.**

At both national and regional levels, greater efforts should be directed towards supporting media operations. For example, what actually wasn't done – financial support was not provided. The National Council repeatedly put forward an initiative, offered the relevant calculations, and submitted to the Cabinet of Ministers a proposal to compensate audiovisual broadcasters' costs of signal delivery by the Concern of Broadcasting, Radiocommunications and Television from the reserve budget fund or partner assistance. Unfortunately, this proposal is still pending.

Examples:
– Coordination of regional broadcasters: the National Council kept media informed of wartime requirements, provided guidance on verified sources, and helped restore broadcasting where it had been lost due to shelling.
– Support for Ukrainian media professionals abroad: within the "Media Heart of Ukraine" project, the regulator shared stories of journalists and broadcasters who were forced to leave but continued working in European newsrooms. This highlighted their resilience and adaptation to new realities.
– Special projects: "Media Heart of Ukraine" – stories of losses and survival of TV and radio organisations from frontline-adjacent and occupied territories (Bucha, Mariupol, Kharkiv, Chernihiv); "Media Flag of Ukraine" – information on support for Ukraine worldwide: which countries switched off Russian propaganda, where Ukrainian broadcasting began, and how foreign media developed programmes for Ukrainians abroad.
– Continued delivery of core functions: despite martial law, the National Council continued implementing its essential functions. The regulator reviewed broadcasters' applications to extend licence validity, reissue licences and register amendments. Company inspections were not conducted due to wartime conditions, but broadcasts were continuously monitored; in cases when violations were identified, the regulator sent notices for swift remediation.
– Simplified procedure for special territories: during wartime, the National Council can issue temporary broadcasting permits for up to one year without a tender and free of charge. It is also permitted to temporarily increase the power of FM transmitters in border and frontline-adjacent areas to "override" Russian signals and minimise their impact. This became a key tool for quick restoration of broadcasting in newly liberated or at-risk regions.
– Support for border-area broadcasters: maintaining broadcasting in frontline-adjacent and border regions is economically challenging – companies don't have the resources to cover transmission costs. Thanks to cooperation with the Partnership Fund for a Resilient Ukraine (funded by the governments of eight countries: Great Britain, Estonia, Canada, the Netherlands, the United States, Finland, Switzerland and Sweden), it was possible to compensate transmission costs for five radio stations on 16 frequencies. Total support amounted to almost 4 million UAH. This helped preserve the Ukrainian signal in areas where Russian propaganda seeks to push out national broadcasting.

Key challenge is the insufficient funding and inadequate prioritisation of investment when supporting media operations, distrust of state funding mechanisms, and weak coordination of this process among international donors.

	Oleksandr Obodovych: "Ensure sustained, clear and transparent rules and mechanisms for state programmes supporting Ukrainian media outlets during wartime, including recognition of the importance of state budget funding for such programmes". • **Active countering of Russian propaganda.** We are convinced that Russian media act as accomplices to terrorism and should be held accountable in the same way as war criminals. **Examples:** – Monitoring and evidence: since February 2022, the National Council has maintained round-the-clock recordings of Russian federal channels. Drawing on these recordings, an evidence base is being created for Ukrainian law-enforcement authorities, international organisations and court proceedings. – Analytical reports were developed, including: "The Destruction of the Kakhovka Hydroelectric Power Plant within the War Propaganda of the Russian Federation" (2023) – an analysis of Russian media coverage demonstrating the systematic nature of disinformation; "What Responsibility Do Russian Media Bear for the Deportation of Ukrainian Children?" (2023), which found that Russian media justify the war crime of deportation by framing the deportations as "rescue from Nazism", etc. – Cooperation with the Center for Countering Disinformation (CCD) of the National Security and Defense Council. In November 2022, a Memorandum was signed. The National Council regularly provides monitoring data to CCD. Joint articles are published as a "Digest of Hate Speech by Russian Propagandists". These articles are also used for appeals to European regulators demanding the ban on Russian channels and individual propagandists. – The list of persons posing a threat to national security: dozens of Russian artists and media personalities who supported the war have been added. Their content is prohibited in Ukrainian broadcasting, and the National Council intensified monitoring and cooperation with the Security Service of Ukraine and the Ministry of Culture. Work is ongoing to include them on sanctions lists both in Ukraine and abroad. **Key challenge** is the quality of the legal justification for such steps and ensuring their targeted nature, while preventing their use as tools against political opponents within Ukraine.
Future plans	• **Restore a fully functioning, pluralistic media environment.** While, in a crisis situation, restrictions on the operation of certain media outlets within the country may be permissible (introduced primarily, for example, to ration limited resources or to implement a unified information policy), those outlets' operations should be reinstated as soon as possible once the crisis ends. **Key challenge** is ensuring a robust legal rationale for such actions and clear time limits for restrictive and prohibitive steps, so as to sustain trust in them both domestically and internationally. • **Lift introduced restrictions gradually, in line with a pre-defined algorithm.** Most additional restrictions on freedom of expression will be lifted once the special legal regime (a state of emergency or martial law) ends. However, after an acute phase of crisis it may remain reasonable for some restrictions to continue in order to prevent an immediate surge of unlawful

narratives returning to the information environment. The competent authorities should therefore lift such restrictions in a phased manner, taking post-crisis risks into account.

Key challenge is aligning the phasing and the overall process for lifting restrictions with the media community and international partners, to ensure the process is predictable and transparent.

- **Conduct a post-crisis review of the regulatory framework, with a view of updating it.**

After the crisis ends, the effectiveness of the introduced restrictions should be assessed and any gaps to be addressed must be identified, while properly balancing national security interests with an adequate level of human-rights compliance. The option of reforming regulatory bodies to strengthen their crisis-response capacity should also be considered.

Key challenge is securing sufficient funding for the regulator both to carry out high-quality analysis and to implement the proposed improvements.

- **Restore local information ecosystems.**

Local information ecosystems have faced significantly greater pressure and losses than the national media environment. It is therefore crucial to develop and implement mechanisms for targeted support in order to rebuild regional media, including in formerly occupied areas, frontline-adjacent and disadvantaged regions.

Key challenge is limited resources, and therefore the need to include media in the list of infrastructure priorities for recovery either through international funding or through incentives for businesses to invest in the media sector.

Chapter 3. Conclusions

Ukraine's experience confirms that information resilience during war is not a technical or purely professional matter. **It is shaped at the intersection of professional decision-making, ethical leadership, institutional preparedness, and cross-sector solidarity.** Below are key conclusions relevant to media ecosystems preparing for prolonged crises.

1. Crisis preparedness determines the scale of losses during the crisis
The main strategic deficit in a full-scale war is time. Ukraine's experience demonstrates that, without prior scenario planning, critical decisions must be taken at the same time as evacuations, shelling, and infrastructure destruction. Crisis preparedness is not a reaction to a threat but a form of responsible governance. Investments in readiness translate directly into lives saved, audience trust sustained, and institutional continuity.

2. Human resilience is the foundation of media resilience
Technologies, platforms and legal frameworks lose their effectiveness when people are exhausted. A prolonged war exposes the limits of heroism and shows that systems built on constant overexertion inevitably break down. Media can remain resilient only when physical and psychological safety, rotation, recovery, and trauma acknowledgement are built into management as core elements rather than treated as optional practices.

3. Trust in leadership is an operational necessity
In wartime, leadership cannot be abstract or remote. Teams do not expect perfect decisions, but clear direction, presence, and personal accountability. Ethical, visible and honest leadership is a critical resource. Without trust, no protocols or strategies can withstand sustained pressure.

4. Information infrastructure is part of the battlefield
The Ukrainian case has confirmed that media infrastructure is a legitimate target for an aggressor. Physical destruction of studios, towers and servers, and the persecution of journalists, are elements of war rather than collateral effects. Information resilience is achievable only through decentralisation and built-in redundancy, and through a readiness to lose physical assets without losing the capacity to keep the society informed.

5. Solidarity among stakeholders safeguards the information environment
One of Ukraine's key advantages has been horizontal cooperation among media organisations, including those that would normally compete or find themselves in relationships of oversight and criticism. In prolonged crises, competition without solidarity undermines the resilience of the entire ecosystem. Agreed cooperation frameworks are as important as editorial independence.

6. Freedom of expression requires active protection, even within a security logic
War inevitably creates tension between security needs and democratic freedoms. Ukraine's experience illustrates that "temporary" restrictions can easily become permanent without checks and collective accountability. Freedom of expression does not automatically survive in wartime; it must be protected through joint efforts by the media, civil society, and international partners.

7. Recovery begins long before the war ends
Resilience is not limited to survival. It includes the capacity to document crimes, work with memory and trauma, rebuild professional communities, and reimagine models of financial sustainability while the war is still in its active phase. Media that do not consider the post-war period during wartime risk losing public trust at the moment recovery begins.