

Ukrainian Parliament Commissioner for Human Rights

Annual Report of the Ukrainian Parliament Commissioner for Human Rights on Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2025

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INTRODUCTION

We often talk about human rights from a legal perspective. But in the context of 12 years of Russian armed aggression, human rights are about very human and simple things. About whether there is anyone to listen to you when it feels as though the whole world has turned a blind eye.

The year 2025 taught me to look at statistics differently: behind every figure lies a human being. Behind every appeal lies someone's hope. And every day I felt how the war affects the rights of every single person – not in an abstract way, but very concretely: in the eyes of mothers, in the tremor of voices, in the silence of people who have waited too long for an answer.

Therefore, in 2025, my work and that of the Commissioner's Secretariat team focused on the areas where the pain was greatest. **We worked across nine areas simultaneously** – and each of them had a personal dimension. Children's rights. The rights of military personnel, veterans, prisoners of war and conscripts. The rights of civilians unlawfully detained by Russia. The rights of people who have lost their homes, loved ones and security. The rights of pensioners and people with disabilities. The rights of national minorities (communities) and religious organisations. The right to information. The right to a fair trial. At the same time, we acted as a national preventive mechanism – going where cameras usually do not venture: into places of confinement. We also worked on European integration, because Ukraine's path to the EU is impossible without an honest look at how we protect human dignity.

All this work was carried out by a team of 544 people – 33 of my representatives in various sectors and regions, 386 civil servants, 76 experts, and 49 non-governmental staff. These are people who work in Kyiv and across Ukraine's regions, often without fanfare, but with great inner strength. And I will say frankly: although the workload grew every month, we persevered. Because we understood what it is all for.

Here are the numbers. These aren't just statistics; they're stories. In 2025, I received 152,592 appeals. Behind every appeal is someone's hope. 2,791 appeals were collective – that's 87,614 people who joined forces because otherwise they wouldn't have been heard. 149,801 were individual appeals. Compared to 2024 – an increase of 24%. Compared to 2023, this is an increase of 59%. Compared to 2022, the number of appeals has increased by 260%. This does not necessarily mean that there are more violations. It means that people have started speaking out. They have started to trust. They have started to realise that they have rights. We received 68,542 verbal and 84,050 written appeals, of which 9,229 did not concern a violation of rights. **The 'hotline' received 63,025 calls.** These are calls that often begin with the words: 'I need help'.

The three main categories of applicants to the Commissioner's Secretariat are: family members of prisoners of war or servicemen missing in action; representatives acting on behalf of a family member; and internally displaced persons.

Looking at it from another angle, in 2025 we were contacted by 97,041 women and 50,295 men; in 5,256 cases, it was not possible to determine the applicant's gender. The highest number of appeals came from Kyiv city, Dnipropetrovsk, Kyiv, Kharkiv, Odesa and Lviv regions. In total, the Secretariat received 11,853 appeals through its regional network, of which 5,507 were submitted in person by applicants during visits to our offices across the country to seek advice or submit an appeal. We received 1,237 appeals from abroad, from 65 countries worldwide.

For me, it is important not only to look at the figures, but also to hear each person's story personally. That is why I regularly hold personal consultation sessions with members of the public. In 2025, the public reception office in Kyiv received 3,384 people.

Overall, the most objective criteria for assessing the effectiveness of our institution are that in 2025, around **1.5 million** human rights were restored or potentially restored.

Other key figures from the year's work.

A total of 4,785 monitoring visits were carried out. The largest number of inspections concerned:

- compliance with the rights of citizens affected by Russia's armed aggression against Ukraine – 2,082, of which 1,066 were inspections of shelters and bomb shelters;
- children's rights – 936;
- information rights – 481, including 98 in the field of personal data protection;
- visits to places of detention were carried out as part of the functions of the national preventive mechanism – 626.

In addition, in my capacity as the Ukrainian Parliament Commissioner for Human Rights, I initiated 6,161 proceedings; prepared 151 submissions; drew up 35 reports on administrative offences; reviewed 3,240 items relating to draft laws and subordinate legislation; and provided 24,363 recommendations to state authorities.

To put this into perspective: every day, the Commissioner's Secretariat reviewed around 12 legislative proposals, conducted around 18 monitoring visits and received around 580 appeals. And that is just looking at a few indicators!

I would also like to add that we devoted considerable effort to legal awareness-raising. We organised 2,730 events, reaching 1 million people from various regions of Ukraine. Among our largest events was the **International Human Rights Conference "Lessons from Ukraine for the World: New Challenges in the Field of Human**

Rights“ ”. We held this conference to mark Human Rights Day on 10 December. A date that holds special significance in Ukraine: it was established by Presidential Decree specifically on the initiative of the Commissioner’s Secretariat. In 2025, the conference took place for the fourth time. 3,157 people joined it both in person and online – ordinary Ukrainians, human rights defenders, journalists, international friends and partners. At one point, this conversation was heard throughout Ukraine – in every region – and at the same time beyond its borders: in Austria, Poland, Luxembourg, Norway, Armenia, Bulgaria, Georgia, Portugal, the United Kingdom of Great Britain and Northern Ireland, Canada and the Czech Republic.

The press conference “The Brave Change the World”, held to mark the third anniversary of my tenure as Commissioner. The event was attended by 40 representatives of Ukrainian and foreign media, some of whom had even travelled from border communities, such as those in the Sumy region. A particular, deeply moving highlight was the exhibition dedicated to the stories of Ukrainian family reunions.

Forums presenting the Commissioner’s Annual Report for 2024, which took place across all regions of Ukraine – and became genuine meeting points between the state and society. Local authorities, human rights defenders, activists, experts and public figures – those who work with real human stories on a daily basis – came together in a single dialogue. At these events, the discussion was not abstract but substantive: it focused on specific practices for supporting children, veterans and internally displaced persons, on solutions that are already working in communities, and those that are lacking. This was not merely a report on the work carried out in 2024, but a dynamic platform for exchanging experiences, ideas and responses to the complex challenges facing the country today.

The presentations of the Commissioner's Special Reports are further important events that reveal the true situation in various areas. I presented Special Reports on compliance with citizens' rights to clean and accessible water under the legal regime of martial law; on ensuring education for children from temporarily occupied territories; on the situation in the temporarily occupied territories; and on preventing torture and other cruel, inhuman or degrading treatment or punishment in Ukraine in 2024.

Furthermore, **I am in constant communication with the media:** in 2025, I held 19 press conferences. Our team responded to 223 media enquiries.

We also ran awareness campaigns. Here are some specific examples: **together with the Cyber Police, we launched an awareness campaign to combat fraud relating to prisoners of war and those missing in action.** We produced a dedicated guide entitled “What forms can fraud take and how can it be countered?”. It explains clearly and simply how to recognise fraudulent schemes, how to verify information and where to turn if suspicions arise. **Reach: 700,000 people across the country.**

We ran an awareness campaign on the protection of personal data and the right to safe access to information. We published 54 articles – each of which helped people understand why personal data is valuable and how to protect it. **360,000 people** across the country learnt more about this topic.

As part of the annual “16 Days of Activism Against Gender-Based Violence” campaign, we ran an awareness campaign: it focused on support and on every person’s right to live without fear. A dedicated leaflet on this topic, created at the end of last year, was widely distributed to the public. Reach: **80,000 people**. Combating violence begins with awareness. And change begins when we stop remaining silent.

We ran an awareness campaign on how Russia is attempting to recruit Ukrainian children to commit crimes. We explained complex issues in simple terms: what recruitment looks like, why it works, and how to stop this influence in time. Following the campaign, I approached the Ministry of Education and Science with a proposal to introduce legal awareness initiatives on this topic in educational institutions.

We organised the **“You Have the Right”** information campaign – it was launched on social media so that people could learn about their rights in simple terms: 10 explanatory videos. Reach – **200,000 people**. All of this amounts to a clear choice to stand by people every day. And when we talk about this choice, we must first and foremost think of those who are most vulnerable in times of war – children.

I would also like to share with you a portal of information leaflets. There you can find up-to-date leaflets and information on human rights in Ukraine.



I’ll ask a very simple question: how does a child feel when the world suddenly ceases to be a safe place?

This question is not merely rhetorical, but the very foundation upon which the entire **protection of children’s rights** is built. In 2025, **I received 3,426 appeals regarding violations of children’s rights**. Each of these appeals represents 3,426 individual stories. We carried out 826 visits and 110 remote monitoring sessions, issued 8,139 recommendations, opened 673 cases, reviewed 231 legislative acts, and prepared 57 response documents. As a result, the rights of 14,927 children were restored.

Our work focused **on fundamental rights**: the right to life, family, education, healthcare, protection from violence and dignified treatment. Often this means not general solutions, but targeted intervention. One such case was the return of a three-year-old boy from Cairo, who had ended up abroad without his mother. For the system, this is a ‘case’. For the staff of our Secretariat, it is a child who should not have been left alone in the world. And so we went to fetch him – 3,600 kilometres. 50 hours on the road. And the boy was reunited with his family in Ukraine.

Separately – the issue that hurts the most. **Deported and forcibly displaced children**. Children from whom childhood, family and friends are taken away – by force, coercion and cruelty. As of 31 December 2025, under the initiative of the President of Ukraine, “Bring Kids Back UA”, we have returned 1,943 children from the temporarily occupied territories and Russia, of whom 667 were returned in 2025 (the Commissioner’s Secretariat returned 410 children, of whom 194 were returned in 2025). Overall, the return of children is a complex and long-term effort involving the state, civil society organisations and international partners, including the State of Qatar and the First Lady of the United States. I will never forget 31 October 2025, when we welcomed children from the Novopetrivska Special School in the Mykolaiv region. During the occupation of Snihurivka, they were deported to Russia and later ended up in Georgia. The children went through trials far beyond their years, but we managed to give them back their childhood.

I always say: simply returning them is not enough. We need to help them move on with their lives. That is precisely why we have set up **Child Rights Protection Centers in Kyiv, Kharkiv, Lutsk, Rivne, and Dnipro**. They operate on the principles of the Barnahus model: children give evidence in the presence of psychologists, in a safe environment where they are not intimidated but listened to. Here, not only educational, social and other rights are restored, but also trust in adults and the state.

And one more thing I truly believe in: a child must know their rights even before they are violated. This is precisely how the initiative for **School and Student Ombudsmen** came about. This involves 1,581 schoolchildren across 16 regions of Ukraine and 45 students in five regions who do not remain silent when faced with bullying, discrimination or injustice. They are already learning to take responsibility for justice.

I am convinced that protecting children’s rights is not a humanitarian choice. It is a strategic decision. Because every child we protect today is an adult who, tomorrow, will not allow this country to be broken. And this is how the future is shaped – not someday, but right now.

And at the same time, our future continues when we protect the rights of those who protect us. From 2022 until today, **bringing our people home** has been one of my personal responsibilities. In 2025, this work did not stop for a single day. In total, since the start of the full-scale invasion, as part of the work of the Coordination Headquarters for the Treatment of Prisoners of War, as of 31 December 2025, we have managed to

return **7,391 of our citizens, including 425 civilians**. In 2025 alone, 11 exchanges took place and 3,435 people were returned: 3,180 military personnel and 255 civilians who had been unlawfully held captive. Behind every figure is a person who survived. And a family who waited.

During every exchange, staff from the Commissioner's Secretariat are among the first to meet those returning. We assess their condition, listen to their testimonies, and gather evidence of what happened in captivity. It is a harsh truth, but it must be documented. Because justice begins with the recording of a crime. The year 2025 brought hope in the middle of the year – through the **Istanbul agreements**. Three rounds of negotiations took place, in which the Commissioner's Secretariat was also involved. In fact, Russia has only fulfilled the agreements of the first round under the '1,000 for 1,000' format. By the end of the year, the process had once again stalled. And this proves once again that, for Russia, people are not a value, but merely a tool of pressure.

Despite this, as Commissioner, I continue to maintain **regular communication on humanitarian issues with the Russian Human Rights Commissioner**. This concerns missing persons, access for international organisations to prisoners of war, and ensuring the basic rights of Ukrainians in captivity. To date, we have managed to deliver 5,000 parcels and 5,000 letters to prisoners of war. To some, these are just numbers. To a prisoner, they are a sign that they are remembered and awaited.

Furthermore, at every meeting with the Russian Human Rights Commissioner, I raise the issue of the conditions in which our citizens are held in Russian captivity. Torture there is not an exception, but the norm.

According to information provided in the Report of the UN Human Rights Monitoring Mission in Ukraine on the human rights situation in Ukraine for the period from 1 June 2025 to 30 November 2025, 185 out of 187 interviewed, released Ukrainian prisoners of war gave testimony of torture and ill-treatment in captivity. That is more than 98 per cent. This truth cannot be ignored.

Another painful reality of 2025 is the **rise in the number of extrajudicial executions of Ukrainian prisoners of war**. **The Office of the Prosecutor General, in response to a request from the Secretariat of the Commissioner, reported that** as of the end of the year, 105 criminal investigations were underway in Ukraine into the killing of 337 of our servicemen in captivity. I responded to every such case and forwarded all available information to the UN and the ICRC. Because these crimes must be documented. And those responsible will be held to account.

A separate aspect of this work concerns **the families of prisoners of war and those missing in action**. These are people living between hope and uncertainty. Throughout 2025, we held **610 meetings with them in Kyiv and across Ukraine's regions, attended by 41,350 people**. Importantly: under our joint initiative, all my representatives participate in the regional working groups of the Coordination Headquarters for the

Treatment of Prisoners of War, and in eight regions they lead these groups: Dnipropetrovsk, Zhytomyr, Poltava (including for residents of Sumy region), Ternopil, Zakarpattia, Khmelnytskyi, Cherkasy and Chernivtsi.

Among our priorities is the extremely important work of securing the return of civilians unlawfully detained by Russia. Civilians are taken from their homes – without trial, without explanation, without the right to make a phone call. According to data from the National Information Bureau’s register, there are 15,443 Ukrainian civilians known to have gone missing or been unlawfully detained by Russia. **The aggressor state has reported only 867 civilians held captive through the ICRC (according to the register mentioned above).** In 2025, we managed to repatriate 255 civilians. Among them were journalists, volunteers, medics, political prisoners and ordinary citizens. Some had spent years in captivity – they had been detained as far back as 2014. Their only ‘crime’ was simply that they were Ukrainian. In total, since the start of the full-scale invasion, as of 31 December 2025, we have repatriated 425 civilians, and together with prisoners of war, 7,391 people. But I would never call this a success. Yes, it is a significant achievement. But thousands more are still awaiting release.

On my initiative, a **separate Working Group on Civilian Issues was established within the Coordination Headquarters for the Treatment of Prisoners of War, headed by my Representative (Deputy) in the Security and Defence Sector.** The Working Group has taken charge of overseeing the implementation of the law on the social and legal protection of unlawfully abducted civilians. A “Roadmap of Rights” has also been introduced – a simple, clear tool for people released from captivity and their families. Because a person in distress should be offered a clear path, not a maze of procedures.

At the same time, we worked on the evacuation of civilians from temporarily occupied territories and from the Russian Federation. I would like to emphasise: this is a separate initiative of the Commissioner’s Secretariat, independent of other repatriation mechanisms. In 2025, we managed to evacuate 363 adult Ukrainian civilians. These are complex routes and an immense responsibility. But every such evacuation represents another life saved.

In total for 2025, in this area **we received 44,783 appeals, carried out 59 monitoring visits (regarding the observance of veterans’ rights; the rights of prisoners of war held by Ukraine; to the TCR and SS and rehabilitation centres for Ukraine’s defenders), issued 41 recommendations, opened 139 cases, and reviewed 455 drafts of normative and legal acts. As a result, we were able to restore the rights of 4,579 people.**

In terms of categories, the largest number of appeals came from family members of prisoners of war and servicemen missing in action – 26,735; representatives of applicants, including lawyers – 4,847; and servicemen and law enforcement officers – 1,680. And every appeal demanded not a formal response, but accountability.

Veterans' policy was also a key focus: 2,077 appeals were received from veterans and their families. 32% of these concerned delays in the allocation and payment of one-off financial assistance for fallen servicemen. Systemic violations of veterans' rights were also identified: unlawful restrictions on pensions, delays in establishing disability status, failure to comply with housing provision regulations, and the lack of a unified approach to honouring the memory of the fallen. A separate but important focus of this work is monitoring the observance of veterans' rights in the regions, which has led to specific recommendations on creating an infrastructure that allows veterans not merely to survive, but to live.

At the same time, I am constantly faced with a systemic problem: Ukraine's specific law on the status of veterans was adopted as far back as 1993. **Over the course of more than thirty years, it has become significantly outdated** – a considerable part of the guarantees it provides have effectively remained merely declarative, whilst the legal regulation of the veterans' sector has become fragmented, contradictory and difficult to apply in practice.

Even after the start of the armed aggression against Ukraine in 2014, and following the establishment of the Ministry of Veterans Affairs of Ukraine in 2018, **a comprehensive and systematic overhaul of state veterans' policy has still not taken place.**

As a result, today those whom the state should be protecting – first and foremost veterans and their families – are once again suffering from the shortcomings of this system.

A separate important issue: in 2025, there is a tendency for TCR and SS staff to carry out forced detentions and document checks in a manner that violates citizens' rights. People are forcibly taken to territorial recruitment and social support centres without the staff having the authority to do so. Often, these staff members cover their faces with balaclavas and do not use body cameras. In 2025, **I received 6,127 appeals concerning indications of rights violations during mobilisation.** These concerned unlawful detentions, as well as superficial medical examinations and issues with deferrals. Every appeal was responded to – through inquiries, investigations and actions within the scope of my authority. As a result, a number of systemic, personnel, legal and organisational problems were identified, and appropriate recommendations were made to address them.

Towards the end of the year, another trend emerged: unlawful actions by citizens against staff of the TCR and SS. I therefore emphasise: mobilisation cannot take place outside the law. Violations of rights are unacceptable on any side. The law must be the sole measure of accountability.

Residents of the temporarily occupied territories, internally displaced persons, and refugees – the war is taking its toll on millions.

As of 29 December 2025, 4,619,000 Ukrainians remained internally displaced (according to data from the National Social Service of Ukraine in response to a letter from the Secretariat of the Commissioner), whilst a further **8,488,000 were abroad, according to data from the Ministry of Foreign Affairs of Ukraine**. Lost homes, ruined lives, documents that burned along with the houses, and the constant question: what next?

In the temporarily occupied territories, Russia is systematically destroying the very idea of human rights. Private homes are arbitrarily declared ownerless (abandoned) and seized. Children are being militarised through education. People are being forced to obtain Russian passports under threat of deportation. The information space is being purged and replaced with propaganda. This is not chaos. It is a clear, planned policy of forced integration – with a gross violation of all fundamental rights.

Throughout 2025, I received 6,631 appeals from IDPs, 394 from residents of the temporarily occupied territories, and 137 from victims of armed aggression. We worked to ensure they had access to pensions, social benefits, education and the restoration of documents. These are not high-profile decisions, but they are precisely what prevent people from breaking down. We carried out 2,082 monitoring visits, issued 6,991 recommendations, opened 1,827 cases, and reviewed 106 normative and legal acts. As a result, we were able to restore the rights of 41,684 people.

A separate note on monitoring visits. We systematically **monitored the living conditions of IDPs**. Over the year, we carried out 819 visits and issued 2,377 recommendations. Some of these have already been implemented, others are in the process of being implemented. And this means very concrete things: warmth, accessibility, and humane conditions.

We launched inspections of shelters and bomb shelters. Because the right to life does not end with the sounding of an alarm. In 2025, we inspected 1,066 civil defence facilities, 80 of which were found to be non-functional. We issued 3,996 recommendations: first-aid kits, water, accessibility, and signage. A shelter must be a place of refuge, not yet another risk. **And alongside this lies the duty to ensure that social and economic rights are guaranteed for the most vulnerable.**

Healthcare, education, employment, social benefits, the right to an environment safe for life and health, the preservation of Ukrainian identity and other rights – these are fundamental matters without which the role of the state loses its meaning. Equally important is the protection of consumer rights and property rights under the legal regime of martial law. We received 4,940 appeals on such issues. We carried out 109 monitoring visits. We issued 584 recommendations and 1,310 comments on legislative acts. We opened 695 cases. We submitted 7 petitions. We restored the rights of 23,304 people.

We conducted a study on citizens' rights to clean and affordable water. We uncovered the true state of water supply: 76% of citizens reported water supply disruptions during martial law, only 53% have access to water during power cuts, and 69% do not drink tap water without further purification. In a number of communities, water and sewage tariffs are three times higher than the average in major cities, whilst the quality of services often remains unsatisfactory. All these findings are set out in my

Special Report on the State of Compliance with Citizens' Rights to Clean and Accessible Water under the Legal Regime of Martial Law.

I would also like to raise a very important issue – social protection for citizens. After all, this issue is not about figures in the budget. It is about whether people can live with dignity. Unfortunately, I am observing an alarming picture: human rights in the social sphere are being systematically violated. Pensions, state benefits, allowances, housing subsidies – everything that should be a source of support for people in difficult times is increasingly becoming a source of stress and despair.

On the same topic – the protection of the rights of those affected by the Chornobyl disaster. Citizens are approaching our institution regarding pension supplements for non-working pensioners living in areas affected by radioactive contamination. As a result of the introduction, by the Law of Ukraine “On the State Budget of Ukraine for 2025”, of new conditions for eligibility for the aforementioned supplement – which are not provided for in the Law of Ukraine “On the Status and Social Protection of Citizens Affected by the Chornobyl Disaster” – more than 32,000 people have lost their entitlement to the supplement compared to the end of 2024. Arrears on these payments, as ordered by the courts, are constantly accumulating due to conflicts in the legislation. Two years ago, I submitted a constitutional petition to the Constitutional Court of Ukraine regarding the unconstitutionality of such legislative provisions concerning these supplements, but the problem remains unresolved.

Another problem in this area, which has left people without benefits for months, is the transfer of responsibilities for awarding social benefits to the Pension Fund. On paper, it is a reform. In reality, there are over 17,000 unprocessed applications. Only after the intervention of the Commissioner’s Secretariat did the funds reach some of the recipients – six months late.

Overall, there are a number of categories of citizens in Ukraine for whom every day is a challenge: low-income families, pensioners, people with disabilities – those who need assistance the most. Targeted support for citizens would be useful here, where instead of payments ‘to everyone’ – support is provided to those living on a minimum income or who find themselves in difficult life circumstances. This rule now also applies to benefits: status alone no longer guarantees assistance; income level becomes the decisive factor.

Thus, the ‘winter support’ programme was introduced – 1,000 hryvnias. For millions of Ukrainians, this became yet another test of the state’s capacity. According to the Ministry of Economy, 9.3 million people received this assistance. But there are also those who lost their entitlement due to technical glitches, outdated data, or errors in the registers. A person might not have physically left Ukraine – but the system ‘decided’ otherwise. And even when the border service refuted this data, it was almost impossible to reinstate eligibility due to the expiry of application deadlines. Only an appeal to the

Prime Minister of Ukraine allowed one of the applicants to receive assistance – and that was on the second attempt, a year later.

In 2025, the state continued to seek mechanisms for rapid support for citizens, yet speed alone is not synonymous with fairness. The government's 'winter support' programme, a one-off payment of 1,000 hryvnias introduced by a Cabinet of Ministers resolution in November 2025, became an example of a one-size-fits-all approach: the same amount for everyone, regardless of how vulnerable a person actually is. Such a tool may yield political and communicative results, but it cannot replace a comprehensive social policy. A just state is not one of symbolic, uniform gestures for all. It is a state that possesses both the will and the precision to direct greater resources where the need is greatest. The scale of this inequality is clearly evident in the case of pensioners. Millions of people in Ukraine live on very low pension payments that barely cover basic needs. Under such conditions, the same amount for everyone does not eliminate inequality, but merely masks it. For some, this is a significant portion of their monthly budget; for others, it is a barely noticeable bonus. That is precisely why it would be far fairer to direct a greater volume of aid to those who truly need it most.

In general, social policy in wartime should be based not on convenience for the system, but on fairness for the individual. This means a few simple things: more resources for those who are most vulnerable; fewer universal symbolic payments; clearer, more understandable and humane rules; no decisions that appear equal on the surface but in reality only deepen inequality.

Housing subsidies have become yet another example of how flawed data exchange can cost a person their last resort. Over 18,000 decisions to terminate subsidies were made on the grounds of 'staying abroad'. However, such claims were not confirmed during checks following specific appeals to me. In one case, a subsidy was terminated because the recipient had crossed the border in 2020, and the fact that he had returned to Ukraine was not taken into account. It was reinstated. But the man did not live to see the payment – he died.

In addition, citizens' rights to timely and appropriate medical care, to free medicines and medical devices, to health assessments, and to access to treatment were being violated. This has hit particularly hard those who have no time to spare – people with rare (orphan) diseases.

Following my recommendations, it was only in January 2026 that the MoH adopted a regulatory act aimed at improving access to diagnosis and treatment for patients with rare (orphan) diseases.

And now – another topic that is whispered about in wartime but is extremely important: the right to biological parenthood. According to the NHSU, in 2025, infertility treatment using assisted reproductive technologies became more accessible. 44 contracts were signed – twice as many as the previous year. The number of patients increased 3.5-

fold – over 6,600 people used this opportunity. But access remains uneven: in 10 regions, such services are completely unavailable. These are just a few examples that show: social and economic policy is not about high-profile programmes and one-off payments. It is about systemic responsibility. Further details regarding the protection of social, economic, cultural and environmental rights will be outlined in Chapter 5 of the Annual Report.

An international armed conflict is not just abstract language from diplomatic documents. It is something people suffer from every day due to Russian aggression. It is explosions whilst you are peacefully sleeping in your bed. These are schools that children will never enter again. These are hospitals that are being bombed when people are being operated on inside. And this is a systematic, deliberate violation of international humanitarian law.

2025 has been a year of constant threats for Ukraine: it has offered just four days of peace without drone and missile strikes. According to information from Ukraine's official fundraising platform UNITED 24, during¹ this time 19,033 air raid sirens sounded, and Russian troops carried out massive strikes on civilian infrastructure, firing 2,400 missiles of various types and deploying 100,000 drones.

According to information published by the UN Human Rights Monitoring Mission in Ukraine, 2025 has become² **the deadliest** year for the civilian population since the start of the full-scale war. 2,514 people were killed and 12,142 were injured – 31% more than in 2024. The strikes on Kyiv, Ternopil, Kryvyi Rih and Sumy were not mistakes. They were deliberate acts of terror against peaceful cities. This demonstrates that nothing is sacred to Russia – strikes were carried out even when people were simply on their way to church...

In total, since 24 February 2022, **Russia has killed 15,172 civilians**³, with around **41,378** civilians wounded. Furthermore, **686**⁴ children have been killed, and **2,380**⁵ children have been wounded. These figures are from territory controlled by the Ukrainian government; it is impossible to verify how many people the Russians have killed in the temporarily occupied territories.

In 2025, I was in Kharkiv and spoke to a mother who had lost her 11-year-old son due to Russian shelling: she had created an exhibition called “Angels of Kharkiv Region”. It is a photo exhibition in memory of the children who died. For me personally, it was a

¹<https://www.facebook.com/u24.gov.ua/posts/pfbid02eUY1FAjEj4qtTBJb7tSHVraBdMQG5QfgJyWghFJ7tm3hVrNRwePPfj4Zcddf8qEI?rdid=64rb2bQkXCqLCaTD>

² <https://ukraine.ohchr.org/en/2025-deadliest-year-for-civilians-in-Ukraine-since-2022-UN-human-rights-monitors-find>

³https://ukraine.ohchr.org/sites/default/files/2026-02/2026-02-16%20HRMMU_Four%20Years%20On_fact%20sheet%20UKR_2.pdf

⁴ <https://childrenofwar.gov.ua/>

⁵ <https://childrenofwar.gov.ua/>

sign: war takes lives, but it cannot erase love and memory. That is why we must speak out about this loudly.

Along with lives, material possessions are also being destroyed: over 250,000 homes – places where people built families, raised children and created memories – have been destroyed or damaged.

It is not just homes that are suffering: as of the end of 2025, 4,456 educational establishments – places where children gained knowledge and dreamed of the future – had been damaged, 408 of them completely destroyed. 2,551 healthcare facilities – hospitals, clinics, pharmacies – have been damaged or destroyed.

And our cultural sites have not escaped destruction either; according to the Ministry of Culture of Ukraine: **1,640 monuments** of cultural heritage and **2,446 sites** of cultural infrastructure have been damaged or destroyed. Russia is also destroying religious sites; as of February this year, according to the project “Religion on Fire”⁶: 742 sites have been damaged or completely destroyed. These are not just buildings – they are our histories, our traditions, our memories.

The aggressor’s attacks do not merely make life difficult – they deprive people of their rights. They take away light and warmth when Russia shells energy infrastructure. What is this, if not terror and genocide?

But even under these conditions, Ukraine continues to protect its citizens – not only at home, but also abroad.

In 2025, we continued to expand our international network of Representatives and Advisers abroad, who carry out their work on a voluntary basis. As of December 2025, there are 6 Representatives and 19 Advisers operating in 24 countries around the world. This network serves millions of Ukrainians who are under temporary protection or hold other migration statuses. We received 1,237 appeals from Ukrainian citizens in 65 countries worldwide. We carried out 13 international monitoring visits and issued 23 recommendations. As Commissioner, I personally held 126 meetings with international partners and undertook 22 visits abroad.

This is daily, behind-the-scenes work: individual handling of appeals, interaction with governments, ombudsmen and human rights institutions. One such case is the defence of the rights of the Ukrainian **Serhiy Kuznetsov**, who was arrested in Italy on charges relating to the ‘Nord Stream’ case. We secured his fundamental rights – to medical care, contact with his family, decent conditions of detention and legal protection in Italy. We are continuing this work following his extradition to Germany, because citizenship is not a formality but a state responsibility.

The Working Group on the Human Dimension, co-chaired by Ukraine, Canada and Norway, has become a separate platform for coordinating international efforts in the field of human rights protection. Since the working group’s establishment, 11 meetings have been held, four of which took place in 2025. The meetings addressed the return of

⁶ https://risu.ua/oprilyudneno-novu-statistiku-poshkodzhenih-religijnih-sporud-za-chas-vijni_n162529

deported and forcibly displaced Ukrainian children, prisoners of war and civilians held within the Russian Federation or in the temporarily occupied territories of Ukraine. This is a complex and lengthy process, yet it is of fundamental importance as it helps to consolidate international efforts and ensures the international community's continued attention to these critically important humanitarian issues.

Another strategic achievement of 2025 was the expansion of the International Coalition for the Return of Ukrainian Children. By the end of the year, the Coalition comprised 46 members, including 43 states and 3 international organisations, as well as 4 states with observer status. During 2025, the Principality of Andorra, the Principality of Monaco, the Council of Europe, the EU and the OSCE PA joined the Coalition. The issue of the deportation and forcible displacement of Ukrainian children has already transcended the confines of a purely national matter and taken on a global dimension, becoming a challenge for the international community that requires consolidated, decisive and coordinated action.

In addition, in 2025, active work was carried out within the framework of international cooperation with national human rights institutions and ombudsman institutions. The institution's active stance within the international human rights community is confirmed by my election to leadership positions in relevant international bodies: in March 2025, I became a member of the Board of the European Network of National Human Rights Institutions (ENNHRI) and an alternate member of the Bureau of the Global Alliance of National Human Rights Institutions (GANHRI), and in June 2025 – a member of the European Regional Board of Directors of the International Ombudsman Institute (IOI). Such participation contributes to the integration of the Ukrainian national human rights institution into the global and European human rights protection system, and to strengthening international solidarity with Ukraine in the face of armed aggression by the Russian Federation.

The institution's activities **in the context of Ukraine's European integration** deserve special attention, particularly with regard to ensuring that human rights standards are taken into account and that Ukraine fulfils its international obligations within the negotiation process. Human rights are not a formal criterion for EU accession, but the very foundation of the negotiation process. In 2025, the Commissioner's Secretariat processed 167 requests (letters) from other state authorities within the framework of the European integration process. In the context of Ukraine's accession to the EU, as the Commissioner, I ensure independent monitoring of respect for human rights, the principles of the rule of law and democratic standards, which are key criteria for the country's progress towards EU membership. My Representative (Deputy) for International Cooperation and European Integration is a member of the Ukrainian delegation participating in negotiations with the European Union on the conclusion of the Agreement on Ukraine's accession to the EU. By engaging in the negotiation process, preparing and implementing reform roadmaps, negotiation processes, as well as providing legal positions and human rights recommendations on legislative initiatives and strategic documents, our institution contributes to the implementation of European Union

standards, the alignment of national legislation with the EU acquis, and Ukraine's fulfilment of its European integration commitments, acting as a guarantor of human rights in this process.

At the same time, we have strengthened our regional network across Ukraine. Today, this comprises **24 regional offices and 26 reception centres.** My Representatives work **in all regions of Ukraine** (the Representative for the Donetsk and Luhansk regions is based in Dnipro, and the Representative for the Autonomous Republic of Crimea and the city of Sevastopol is based in Kyiv). In 2025, **5 new Human Rights Protection Centers and 4 Child Rights Protection Centers were opened: in Kharkiv – the Child Rights Protection Center** (with the support of UNICEF, the Governments of the French Republic and the Kingdom of Norway); **in Lutsk – the Child Rights Protection Center** (with the support of UNICEF and the Government of the Kingdom of Norway); **in Rivne – a Child Rights Protection Center** (with the support of the Government of the Republic of Korea and the Korea International Cooperation Agency (KOICA)); **in Dnipro – a Child Rights Protection Center** (with the support of the Government of the Republic of Korea and KOICA); **in Zhytomyr – a Human Rights Protection Center** (with the support of the Government of the Republic of Estonia); **in Uzhhorod – Human Rights Protection Center** (with the support of UNHCR and the partner non-governmental organisation NEEMIA), **in Chernihiv – Human Rights Protection Center** (with the support of the Government of the Republic of Latvia); **in Khmelnytskyi – the Human Rights Protection Center** (with the support of UNHCR), **in Ternopil – the Human Rights Protection Center** (with the support of UNHCR and local authorities).

This means one thing: people can come for help not 'sometime', but right here and now. At the same time, we have faced a terrible reality in this work: **our office in Sumy was destroyed as a result of Russian rocket fire on 13 April 2025.** On that day, the enemy struck a peaceful city during Palm Sunday. We did not give up and eventually re-established it in another building, because we know: for people in the region, this is not just an 'office', but a source of hope. And even in war, even after the destruction, we must be where we are needed. I personally visited this destroyed Representative Office and also travelled to the regions: in 2025, I made 12 such visits. These included visits to many regional offices, discussions with local authorities, and organising meetings with the families of prisoners of war and those missing in action under special circumstances.

Rights for all: regardless of views and background. Everyone in Ukraine must be guaranteed human rights – regardless of **where they come from, their faith or nationality.** Despite this, we received **1,756 appeals regarding violations of equal rights and freedoms, the rights of national minorities (communities), political views and religious beliefs.** We also carried out **174 monitoring visits**, issued **684 recommendations**, reviewed **190 draft normative and legal acts**, and opened **199 proceedings.** We succeeded in restoring the rights of **157 people.**

Indeed, thanks to our initiative, we resolved the issue of issuing foreign passports to children, regardless of which parent submits the application.

We helped expand the scope of mobile documentation services for residents of remote and war-affected areas, and also facilitated the adoption of a national standard for social services regarding the adaptation of housing for people with disabilities. Each of these changes is like a small bridge connecting people with their right to a dignified life.

I paid particular attention to **protecting the rights of national minorities (communities) and the indigenous peoples of Ukraine**. I saw how important it is for Roma communities, which are often overlooked, to have the opportunity to obtain documents, to be heard and to be represented. We implemented a pilot project on documentation, conducted a large-scale social survey, and developed methodological recommendations for monitoring the observance of the rights of national minorities (communities) within the framework of Ukraine's European integration commitments. At the same time, we worked to ensure that **people's rights** remain unshakeable, so that there is no place for discrimination, crimes motivated by intolerance, or hate speech.

This is not about theoretical words on paper, but about people who live by their faith every day, attend places of worship and pray for peace and justice. And this is precisely where the team at the Commissioner's Secretariat also defends human rights. Our staff joined the work of the Commission tasked with verifying the historical and scientific value of the remains of the Holy Monks of the Caves in the Near and Far Caves of the Kyiv-Pechersk Lavra National Reserve. This is precisely the area where Russian propaganda has attempted to spread its narratives. We carried out **22 visits** to the Lavra, taking part in the inspection of **63 sites in the Near Caves** and **34 sites in the Far Caves**. This ensured transparency and the legitimacy of our actions.

Separately, regarding the **St. Nicholas Catholic Cathedral**: a site that has been awaiting return to the religious community of the Parish of St Nicholas Cathedral in Kyiv for almost 20 years. The reason for the violation is simple, yet complex at the same time – the MinCult failure to comply with the court ruling on the transfer of the church to the parish's use. And even despite the instruction from the President of Ukraine and the memorandum signed by the religious community with the Ministry of Culture of Ukraine, the church remained a 'concert venue' for years, rather than a fully-fledged place of worship. The Commissioner's Secretariat took the matter under its wing: it sent enquiries, investigated the circumstances, and carried out a monitoring visit to the church. It was found and documented that the church was in a state of disrepair. Thanks to all our efforts, justice prevailed: on 6 January 2026, St. Nicholas Cathedral was finally handed over to the religious parish.

Another major challenge for the future is **the elections in Ukraine**. The Constitution of Ukraine guarantees the people the right to exercise power through free elections, and every citizen the right to vote and to stand for election. And although

elections are impossible during martial law due to the restrictions in place, preparations for the elections following its lifting must begin now.

Democratic elections are impossible without two basic conditions: security and a real opportunity for everyone to exercise their electoral rights: internally displaced persons, our citizens who have received temporary protection abroad, residents of frontline and temporarily occupied territories, and military personnel. That is why, by Order No. 1993 of the Speaker of the Verkhovna Rada of Ukraine dated 22 December 2025, a **Working Group on the Preparation of Legislative Proposals Concerning the Organisation of Elections During a Special Period and Post-War Elections** was established.

Staff of the Secretariat and I personally are also involved in its work. Sub-groups have been set up within the working group to draft amendments to existing legislation so that the first post-war elections take place fairly, safely and with maximum citizen participation. After all, democracy is not just words in laws; it is the reality people experience when their voices are heard and their rights are truly protected.

Progress has also been made in the area of personal data protection and information rights. To many, this topic may sound abstract. But for me, behind every figure stands a person, their privacy, their peace of mind, and their sense of security. **We received 15,217 appeals on these matters. We issued 1,934 recommendations to state and local government bodies regarding the observance of information rights, and 716 recommendations regarding the practical application of personal data protection legislation.** We initiated **2,517 proceedings**, and reviewed **331 draft normative and legal acts**. Separately, we carried out 98 inspections in the field of personal data protection and issued 75 orders to remedy violations. In addition, 32 reports on administrative offences under Articles 188-40 and 212-3 of the CoAO of Ukraine were drawn up and referred to local courts for consideration. As a result of this work, we have restored 2,928 human rights. Based on materials sent by the Commissioner's Secretariat to pre-trial investigation bodies regarding violations related to the unlawful processing of personal data, **entries were made in the Unified Register of Pre-trial Investigations concerning 35 cases.** Each of these decisions is a step towards ensuring that people can trust the state, that their data will not be manipulated or turned into a weapon against them. But our work is not limited to the issue of accountability. We carried out **383 on-site inspections/monitoring visits regarding compliance with the right to petition and access to information.** Because the right to freely gather information, the right to ask questions, and the right to receive answers are the foundation of democracy. This is what makes the state vibrant and ensures that citizens are heard and valued.

To ensure these rights become a reality, rather than mere lines in the law, we have held **862 awareness-raising events.** Training sessions for representatives of the Central Election Commission, the NPU, the Pension Fund and local government are not merely training; they are sowing the seeds of understanding and responsibility. We have also

launched a hybrid course, “Training Programme for Data Protection Officers (DPOs) in Ukrainian State Institutions”, and an educational series, “Training Course for Data Protection Officers”, on the Diia Platform. Education in Ukrainian and English, so that those who process data realise: every byte of information represents a person’s trust, their right to privacy and peace of mind.

These figures are proof that our state can protect its people, can stand by everyone who relies on the law.

The right to a fair trial and procedural rights must not remain empty words in the law. The judicial system must function in such a way as to ensure real and effective protection of human rights and freedoms, rather than creating obstacles to their realisation.

We have processed 7,164 public appeals on this issue – each of which reflects a specific life situation and the applicants’ expectations regarding the proper protection of their rights.

The Commissioner’s Secretariat carried out **433 monitoring visits**, issued 6 recommendations and reviewed **598 normative and legal acts**, and initiated **109 proceedings**. We succeeded in restoring the rights of 1,065 individuals.

I participated in 7 court hearings in civil and administrative proceedings as a representative of other persons and as a third party. I submitted 11 petitions, as well as one constitutional petition, which is particularly significant given that, as the Commissioner, I am one of the few entities with the right to appeal to the Constitutional Court of Ukraine. The exercise of this power is an effective tool for the protection of human rights. Following the results of the investigations I initiated, law enforcement agencies launched 79 criminal proceedings. And these are not just figures – they represent the rights of citizens who are receiving real protection and redress.

We focused particular attention on ensuring that **the procedural rights of participants in judicial proceedings** – civil, administrative and criminal – do not remain mere words on paper. We have worked to restore the rights of **minors, victims and persons deprived of their liberty due to the war**, as well as to eliminate **systemic violations in the courts, law enforcement agencies and penal institutions**. Because a fair trial is not merely a judge’s decision. It is a person’s fate, their safety, their dignity.

We also worked on **improving legislation**, because new regulations are tools that give people a chance. On our initiative, a law was passed to provide prisoners and convicts with **free legal aid**, and the mechanism for processing old-age pensions for persons in custody was regulated.

In this work, not only national but also international victories have been landmark achievements. In particular, the decision of the European Court of Human Rights of **9 July 2025 in the case of ‘Ukraine and the Netherlands v. Russia’**, which upheld almost

all of Ukraine's complaints against the Russian Federation. This is a signal to the world that **human rights violations have consequences**. And the ECtHR referred to the work of the Commissioner's Secretariat. For me, this means: our work has the power to change reality.

Human rights must not remain empty words, especially in places where people are deprived of their liberty. The Commissioner's Secretariat visited places where people are often overlooked: police stations, psychiatric institutions, care homes for the elderly, penitentiary institutions and many others. In 2025, 626 NPM visits were carried out and 5,960 recommendations were issued. Behind each visit lie not just walls and numbers, but real-life stories. Separately, we reviewed 19 normative and legal acts, submitted 62 submissions, and initiated the entry of 10 reports into the URPTI regarding criminal offences involving human rights violations in places of detention.

We also tested new approaches: we implemented pilot projects involving the autonomous work of community monitors within regional groups, systematically monitored human rights compliance at the Kyiv Remand Centre, worked to ensure rights were upheld in privately-owned institutions, and advocated with the Ministry of Health of Ukraine for the implementation of the **"Safewards" programme, so that** people in psychiatric institutions would be safer and more at ease, and so that medical care in prisons would meet standards and be accessible to the entire population.

Another complex but essential aspect of this work is monitoring the conditions of detention for Russian prisoners of war in Ukraine. Monitoring visits are conducted to verify respect for prisoners' rights, their living conditions, access to medical care, adequate nutrition, sanitary conditions, and the ability to communicate with relatives and representatives of international organisations. The aim is one: to demonstrate that Ukraine adheres to the provisions of the Geneva Convention on the Treatment of Prisoners of War.

All of this is not merely work, not just inspections and reports. It is a daily reminder that behind the walls of every facility there are people with fears, hopes and dignity that no one has the right to violate. And it is precisely this awareness of our responsibility that makes every day of our work meaningful.

For me, 2025 is a year of responsibility. A year when we did not merely react to the crisis, but laid the **foundations of a system** that must function effectively in peacetime. For the true strength of a state lies in its ability to protect its people when the world around them is falling apart.

In 2025, the state system, unfortunately, continues to operate on the principle of a fire brigade: wherever a fire breaks out, everyone rushes there to put it out. Reaction instead of strategy. But human rights are not a fire that can be extinguished with a one-off decision. It is a framework within which the state must act not reactively, but consistently and predictably. What is needed is a holistic vision, a clear division of responsibilities, and a state policy on human rights protection that is formulated not piecemeal but comprehensively.

This is not the responsibility of a single ministry responding to a narrow segment of the problem. It is the responsibility of the Government as a single entity. It is the focus of Parliament, which must provide the legislative framework. This requires the mandatory involvement of the Commissioner's Secretariat as an independent institutional safeguard. And it requires the constant engagement of civil society – as the voice of those who are most often unheard.

When there is no shared vision, inequality arises. And we are already seeing its manifestations. Take internally displaced persons, for example. Some IDPs can exercise their right to the 'eRecovery' or 'eSupport' programmes. Others cannot. Those who became displaced between 2014 and 2022 often find themselves excluded from support mechanisms. The same applies to those whose homes are not formally destroyed but have effectively remained in temporarily occupied territories – inaccessible, effectively lost for living purposes – so there must be a new category of assessment and, accordingly, compensation. And this is precisely where it becomes clear: without a systematic policy, the state unwittingly creates different levels of rights for its citizens. And human rights cannot be 'partial' or 'selective'. They are either protected for everyone – or vulnerable for everyone.

And to conclude, I want to say what none of these figures, reports, decisions and international frameworks would be possible without. This is happening thanks to the people who, every day, carry this state – literally on their shoulders.

Thank you to **Ukraine's defenders** – those standing on the front line, in the cold, under fire, with no room for error. It is thanks to you that millions of people can wake up at home. It is thanks to you that we have the opportunity to speak of human rights – for without the right to life, no other rights exist.

Thank you to **the energy workers** – the people who restore the lights every day. In the literal sense. You are restoring not only the power grid – you are restoring a sense of normality and hope. Thank you **to the medics, rescue workers, critical infrastructure staff, volunteers, social workers and educators**. To those working in shelters, in de-occupied territories, and near the front line. Every day, you prove that **humanity is stronger than terror**.

Thank you to **our international partners**, who have not turned away, who support Ukraine not with words but with deeds – through sanctions, aid, solidarity, and helping to bring our people home. In a world where fatigue has become a new threat, your support is crucial.

I am also grateful to **civil society**: human rights defenders and activists who stand guard over human rights every day, and who join our Expert Councils, meetings and round tables. These are the people who show that a state's true strength is revealed when it listens to and works together with its people.

I would like to express my gratitude to the honourable **Members of the Ukrainian Parliament** – for their principled stance, for their willingness to listen to complex issues and seek solutions that strengthen the protection of human rights even in the most difficult times.

And separately – I thank every citizen of Ukraine. Those who speak out, who do not remain silent, who do not accept violations, who demand justice. It is your activism that makes the Secretariat of the Commissioner vibrant and essential.

This war is about destruction. But our response is about protection. So when the question arises: **which will prevail – the force of arms or the force of human dignity?** I will answer with confidence: the path to victory lies in our unity, our daily perseverance, and **in the decision to defend human rights not after the war, but during it.** This is how a country is built that looks to the future without fear.

*Dmytro Lubinets,
Ukrainian Parliament Commissioner for Human Rights*

1. THE RIGHTS OF VICTIMS OF THE RUSSIAN FEDERATION'S ARMED AGGRESSION AGAINST UKRAINE

Number of appeals	7,298
Number of cases	1,827
Number of rights restored (individual and collective)	41,684
Number of draft normative and legal acts reviewed	106
Number of monitoring activities (on-site and off-site)	2,082
Number of recommendations issued following monitoring visits	6,991

Throughout 2025, Ukrainians faced human rights violations as a result of the Russian Federation's ongoing armed aggression against Ukraine. A significant number of IDPs, residents of the TOT, those who have left the country, as well as other affected groups, remain dependent on the effectiveness of inter-agency coordination and the continuity of state policy. At the same time, numerous institutional transformations took place throughout the year, including the transfer of powers between central executive bodies and changes in the remit of ministries, which effectively continues a trend that began as early as 2024 and negatively impacts the stability of state programme implementation and citizens' access to guaranteed services. In particular, the abolition of the MinReintegration and the subsequent transfer of relevant powers first to the MTD, and subsequently, the part concerning IDPs, to the MSPFU, took place without a proper transition period, a clear delineation of functions, or the preservation of specialised expertise, which heightened the risks of losing the focus of state policy on those affected by the war.

In 2025, an additional factor contributing to institutional instability was the creation and subsequent dissolution of the MNE – the central executive body responsible for formulating and implementing policies on national unity and support for citizens who had been forced to leave their homes, particularly those who had fled abroad as a result of the war. Its short period of operation and the lack of proper institutional continuity during its dissolution led to a fragmentation of powers and negatively affected the consistency of state policy in the sphere of national unity and support for those affected.

Such processes create a situation in which active regulatory and organisational activity is formally declared, yet in practice a significant proportion of decisions amount to a redistribution of functions without adequate strengthening of the authorities' capacity, resource provision or a clear definition of responsibilities.

As of the end of 2025, Ukraine lacks comprehensive strategic documents that would define a coordinated state policy on the protection of the rights of affected populations, in particular internally displaced persons, persons forced to flee abroad due to armed aggression, and residents of temporarily occupied territories, as well as on ensuring conditions for return and reintegration. The absence of such framework documents makes systematic planning, the evaluation of the effectiveness of state measures, and proper parliamentary and public oversight impossible.

1.1. Rights of Victims of the Russian Federation's Armed Aggression

(a) Assessment of the national system for the protection of affected populations

The national system for the protection of persons affected by the RF's armed aggression against Ukraine remains fragmented and fails to provide an adequate level of support for the rights of victims or to establish a comprehensive, systematic and victim-centred approach. The absence of a coordinated state policy in this area negatively affects victims' access to support, compensation and reparations. Throughout 2025, no single strategic document was adopted to define state policy on support for the affected population.

The category of residents of the temporarily occupied territories remains particularly vulnerable and effectively outside the state protection system; they systematically suffer human rights violations but are not covered by effective mechanisms for documenting harm and accessing assistance.

The draft Concept for Improving the National System of Legal Remedies and Support for Persons Affected by Armed Aggression against Ukraine, which was submitted to the Cabinet of Ministers of Ukraine for consideration as the basis for developing a government Strategy for Supporting Affected Persons, did not receive support from the relevant central executive authority at the time and was effectively halted at government level. As a result, the formulation of state policy was shifted to the drafting of a Presidential Decree, which, as of the time of writing this report, had also not been adopted.

The legislative framework established in previous periods indicates the **existence of two parallel strands of state policy regarding victims**: on the one hand, the development of mechanisms for financial compensation and the recording of material losses; on the other, isolated measures in the area of identifying and supporting individuals who have suffered non-material harm. This approach does not comply with the principles of comprehensiveness and a human-centred approach, as provided for by international human rights standards; it is not accompanied by the creation of an integrated support system and contains a number of shortcomings and gaps, which are set out below.

In the previous period, Parliament adopted important legislative acts aimed at documenting harm caused to personal non-pecuniary rights, as well as at introducing specific forms of urgent interim reparations, in particular the Law of Ukraine "On the Recording of Information Regarding Damage Caused to the Personal Non-Property Rights of Individuals as a Result of the Armed Aggression of the Russian Federation against Ukraine" (hereinafter – Law No. 4071-IX). However, in 2025, no comprehensive support system for affected persons was established, apart from the adoption by the Government of certain normative and legal acts aimed at creating an information recording system (Resolution of the Cabinet of Ministers of Ukraine No. 450 of 15 April 2025 "Certain Issues Concerning the Functioning of the Information Recording System on Damage Caused to the Personal Non-Property Rights of Individuals as a Result of the Armed Aggression of the Russian Federation against Ukraine"). The draft law on systemic measures to support persons affected by the armed aggression against Ukraine has not been submitted to the Verkhovna Rada of Ukraine (Parliament) for consideration,

which makes it impossible to realise the rights guaranteed by law for a significant portion of the affected population.

A separate **systemic challenge remains the updating of the National Human Rights Strategy**. Given the scale and consequences of the Russian Federation's full-scale armed aggression, previous amendments to the Strategy have become obsolete, and the provisions of the section "Overcoming the negative consequences of the armed conflict" require substantial revision and expansion. In 2025, during a regular meeting of the expert council with the Representative (Deputy) of the Commissioner for the Rights of Citizens, who are Victims of the Armed Aggression against Ukraine, the need was emphasised to include in the updated Strategy provisions on reparations, access to compensation mechanisms, as well as the conduct of information and awareness-raising activities regarding international mechanisms for compensation for harm, etc. The Commissioner's Secretariat submitted proposals for the draft amendments and participated in thematic meetings at the Ministry of Justice of Ukraine on this issue. Throughout 2025, the updated National Human Rights Strategy was never approved, which has a negative impact, in particular, on strategic planning in the field of protecting the rights of victims of armed aggression.

The focus of the state authorities responsible for this area is shifting predominantly towards the work of the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine, which is effectively seen as a key instrument for future compensation, whilst the development of national mechanisms to support victims remains insufficient.

This imbalance exacerbates the vulnerability of those who need assistance today.

(b) Establishment and operation of the System for recording information on harm caused to personal non-property rights

In 2025, the Government failed to ensure proper implementation of the direct requirements of legislation in this area, and the issue of establishing a comprehensive system for recording and supporting victims was not included by the MSPFU in the Programme of Activities of the Cabinet of Ministers of Ukraine for 2025–2026, which may indicate a continued lack of a systematic approach to protecting the non-property rights of the affected population. The recommendations of the Ukrainian Parliament Commissioner for Human Rights, provided in the Annual Report for the previous year, have been partially implemented in this regard. Thus, the Transitional Provisions of Law No. 4071-IX stipulated the obligation of the Cabinet of Ministers of Ukraine to develop and submit to the Verkhovna Rada of Ukraine, within one month of its publication (by 18 January 2025), a draft law on measures to support persons whose personal non-property rights have been infringed. Furthermore, the powers of the Cabinet of Ministers of Ukraine included the definition of categories of affected persons, which is of key importance for the establishment of a fair, unified and sustainable mechanism for state support. As of the end of 2025, these legislative requirements, and consequently the recommendation provided in the previous period, have not been fulfilled: the draft law on systemic support measures has not been submitted, and the categories of affected persons have not been defined at the regulatory level.

At the same time, in accordance with Law No. 4071-IX, the KМУ adopted Resolution No. 450 of 15 April 2025 “Certain Issues Concerning the Functioning of the System for Recording Information on Harm Caused to the Personal Non-Property Rights of Individuals as a Result of the Armed Aggression of the Russian Federation against Ukraine”, which establishes the legal and organisational foundations for the creation and functioning of the Information Recording System. In accordance with the resolution, its implementation is to be carried out in stages: the first stage during 2025, the second from 1 January 2026. Consequently, the recommendation provided by the Commissioner’s Secretariat was implemented. However, such implementation, including in connection with the termination of certain international financial programmes, did not take place.

Consequently, as of 2025, the system for recording information on harm caused to personal non-property rights does not function as a tool for the comprehensive protection of victims’ rights and is not integrated with mechanisms for the provision of assistance, social services and reparations.

Failure to comply with the direct requirements of the legislation and the Commissioner’s recommendations indicates a lack of proper institutional accountability for the formulation of policies to support victims. Without defining categories of victims, without adopting a law on systematic support measures and without creating a single integrated information infrastructure, the state is effectively limited to recording violations without ensuring the effective restoration of the rights and dignity of persons who have suffered as a result of the RF's armed aggression against Ukraine.

(c) The rights of persons affected by hostilities, explosive devices and military weapons resulting in disability

Establishing a causal link between disability and health damage sustained as a result of hostilities or explosive devices remains one of the key challenges for those affected. In accordance with Resolution No. 306 of the KМУ dated 25 April 2018, “Certain Issues Concerning the Establishment of a Link Between Disability and Wounds or Other Health Impairments” (hereinafter – Order No. 306), the procedure for establishing such a link is carried out through forensic medical examination and consistent confirmation of the circumstances in which the injury was sustained.

The amendments to Order No. 306 introduced on 2 July 2025, which had long been advocated by the Commissioner’s Secretariat, ensured that a link between disability and injuries could be established only for persons who sustained health impairments in de-occupied territories. As a result, civilians who were evacuated or displaced from the TOT, where they sustained their injuries, have no real opportunity to officially confirm the fact of their disability, even if they possess medical documents or reports from medical institutions issued in the TOT.

For instance, a woman who was wounded in March 2022 in Mariupol – an area recognised as temporarily occupied territory – contacted the Commissioner. In this regard, an interdepartmental commission established under the Minvet refused to recognise such a connection, despite the fact that she was evacuated to territory controlled by Ukraine following her serious injury.

To resolve the existing issue, the Commissioner sent a request to the Minvet regarding the introduction of relevant amendments to Order No. 306.

As such cases were not isolated, the applicant's case attracted significant attention, and given that hostilities in Mariupol had effectively continued until May 2022, the authorities of Donetsk region initiated amendments to the List of Territories to recognise Mariupol as temporarily occupied from May 2022.

These changes enabled affected Mariupol residents to secure the right to have their disability recognised on the basis of health impairments caused by explosive devices. However, this did not resolve the problem as a whole.

The Commissioner believes that equality of rights and access to state support, regardless of the territory in which the injury occurred, must be guaranteed by the Constitution of Ukraine. That is why, during the reporting period, the Commissioner's Secretariat systematically emphasised – in particular through official appeals to the Government and the Minvet – the need to extend the territorial scope of Order No. 306 to cover injuries sustained in temporarily occupied territories, as well as to introduce a mechanism for recognising alternative evidence. Consequently, following the Commissioner's advocacy efforts and the consideration of the proposals submitted, amendments were made to Order No. 306 on 24 December 2025, removing the territorial restriction on the location where injuries or other health impairments leading to disability were sustained, for the purpose of establishing such a link.

In practice, victims face numerous procedural and organisational obstacles, in particular the difficulty of obtaining an extract from the URPTI due to restrictions on access for persons who are not applicants or do not have the procedural status of a victim, as well as the lengthy timeframes for obtaining forensic medical examination reports necessary to confirm injuries. These circumstances significantly complicate or even render impossible the realisation of the right to establish a causal link and receive state support for persons with war-related disabilities, which necessitates changes. The central executive authority responsible for implementing the relevant mechanism should also be reviewed.

(d) Property rights of victims

The right to property, guaranteed by Article 41 of the Constitution of Ukraine, remains one of the most vulnerable rights in the context of the RF's armed aggression against Ukraine. Introduced by the Law of Ukraine "On Compensation for Damage and Destruction of Certain Categories of Immovable Property as a Result of Hostilities, Terrorist Acts, Sabotage, Caused by Armed Aggression of the Russian Federation against Ukraine, and the State Register of Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, Sabotage, Caused by Armed Aggression of the Russian

Federation against Ukraine” and subordinate legislation, the mechanism for compensation for damaged and destroyed housing has enabled tens of thousands of people to receive assistance. However, the Commissioner’s recommendations, set out in previous annual reports to the MTD and the MinDigital regarding the introduction of a property registration mechanism in the temporarily occupied territories, the expansion of opportunities to submit information via the Diia Portal since 2014, and the provision of registration of movable and non-residential property in the RDDP, remain unfulfilled.

Thus, current legislation limits the scope of the compensation mechanism to property damaged or destroyed after 24 February 2022, and does not apply to property that was located in the TOT on that date (KMU Resolution No. 1176 of 22 September 2025 “On the Approval of the Procedure for Providing Assistance to Resolve Housing Issues for Certain Categories of Internally Displaced Persons Who Resided in the Temporarily Occupied Territories, and amending the Procedure for Maintaining the State Register of Damaged or Destroyed Property as a Result of Hostilities, Terrorist Acts and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine”). Despite the fact that, according to the MTD, as of 10 December 2025, 153,477 families had received compensation totalling 56 billion 997 million hryvnias, owners of housing located in the TOT cannot access the compensation mechanism on general terms. This indicates the absence of a comprehensive state policy to address the housing issue for individuals whose homes remain in the TOT or were damaged or destroyed there. Consequently, a significant proportion of such individuals have no access to compensation mechanisms or alternative housing support instruments. This situation creates inequality in access to state compensation mechanisms depending on the location of the property and may be regarded as a sign of discrimination on territorial grounds, as individuals whose homes are located in the TOT find themselves in a worse position compared to others affected by armed aggression.

The housing voucher scheme introduced in 2025 for certain categories of IDPs from the TOT has a limited scope of beneficiaries (combatants and persons with war-related disabilities) and does not resolve the issue of access to compensation for the majority of affected persons who have moved from the TOT. As a result of the lack of systematic solutions regarding compensation or the provision of housing for persons whose homes have been damaged or destroyed, or whose right to use them is restricted, there is a risk that some people may decide to return to the temporarily occupied territories due to the availability of housing there and the lack of prospects for support to rebuild their lives in the territory of Ukraine controlled by the Government.

The Commissioner regularly receives appeals from citizens regarding compensation for housing located in the TOT. During 2025, 117 such appeals were received (45 – Kharkiv region, 32 – Donetsk region, 23 – Zaporizhzhia region, 11 – Kherson region, 6 – Luhansk region). In their appeals, people state that they have completely lost access to their homes and are excluded from any state compensation mechanisms. Such appeals highlight a significant legal gap, whereby citizens affected by armed aggression are effectively deprived of any prospect of exercising their right to compensation, creating prolonged social tension and a sense of discrimination on the basis of territory. Law No. 2923-IX provided for the introduction of mechanisms for the remote survey of destroyed property in combat zones and in the TOT. However, it was not until July 2025 that the

procedure for remote surveys in combat zones was partially regulated (KMU Resolution No. 815 of 7 July 2025 “Certain Issues Concerning the Conduct of Remote Surveys of Destroyed Real Estate Objects of Specific Categories Located in Areas of Potential Combat Operations for Which No Date for the Cessation of Combat Operations Has Been Determined, Areas of Active Combat Operations, and Areas of Active Combat Operations Where State Electronic Information Resources Are Operational, for Which No Date for the Completion of Combat Operations Has Been Determined”), while objects in TOTs remain outside the scope of the procedure. The absence of such a mechanism makes it impossible for owners to access compensation and effectively deprives them of their right to compensation for damages.

The remote inspection mechanism introduced by Resolution No. 815 was perceived by citizens as a critically important tool for documenting the destruction of housing prior to a possible occupation or complete loss of access to the territories. The sharp increase in the number of applications has led to an excessive workload for local government commissions, the accumulation of a significant number of reports with an undefined status, and heightened social tension.

During parliamentary oversight, systemic issues were identified in the application of Resolution No. 815, particularly regarding the proper assessment of the condition of the property being surveyed and the complexity of interpreting identical provisions of the resolution concerning the sufficiency of evidence of destruction. A separate problem remains the excessive bureaucratisation of interaction between authorities, where data clarification is carried out through numerous additional requests, which significantly delays procedures.

A striking example is the case of a woman from a frontline town in the Donetsk region, who submitted an application for an assessment in May 2025, provided additional documents in paper form and commissioned a technical report at her own expense, however, due to the backlog, the case has been under consideration for seven months, leaving the applicant in a state of prolonged legal uncertainty.

Although the criteria for destruction set out in Law No. 2923-IX are decisive for the purposes of granting compensation, in practice, commissions are forced to rely on existing subordinate regulatory instruments for assessment, in particular the provisions of the Methodology for Conducting Surveys and Documenting Their Results, approved by Order No. 144 of the Ministry for Development of Communities and Territories of Ukraine dated 6 August 2022. The aforementioned Methodology regulates exclusively technical surveys conducted in the physical presence of specialists and is not adapted to the conditions of remote surveys, which do not explicitly provide for the application of classification criteria for damage or the determination of the percentage of destruction. In the absence of a specific regulatory framework for the remote format, commissions effectively find themselves in a situation of legal uncertainty and lack adequate methodological guidance for decision-making. This necessitates the regulatory regulation of the remote inspection mechanism, in particular by adapting the current Methodology

No. 144 to the remote format, or by developing a separate methodology for determining the destruction of immovable property exclusively for remote inspection.

A citizen has appealed to the Ukrainian Parliament Commissioner for Human Rights regarding the protracted processing of her application for compensation for the destruction of a property located in a block of flats in a frontline town in the Donetsk region.

Following an examination of the technical report submitted, the Commission established that the damage and destruction documented therein relate exclusively to the third entrance of the apartment block and the roof as a whole, and that the recommendations for demolition do not apply to the first and second entrances, which, although damaged, retain their load-bearing and enclosing structures.

In this regard, the Commission concluded that the apartment block as a whole is damaged, not destroyed, with the exception of the flats in the third entrance, and suspended consideration of the application pending the results of a comprehensive technical survey of the entire building.

At the same time, the building in this condition effectively loses its economic value and is subject to further deterioration, particularly due to weather conditions.

In the context of armed aggression, there are virtually no safe areas, which necessitates the ability to respond promptly to the consequences of destruction. In this regard, commissions for the assessment of damaged and destroyed property must be established within each local government body as a fundamental component of the system for recording damage and ensuring citizens' right to compensation.

Furthermore, Law No. 2923-IX and Order No. 600 provide for the possibility of heirs applying for compensation for destroyed housing, provided they hold a certificate of inheritance. At the same time, current legislation does not provide for a mechanism for the realisation of a housing certificate in cases where the right to compensation is inherited, as a housing certificate is not an object of property rights but merely certifies the right to receive compensation.

A woman appealed to the Commissioner, reporting that the house in which she had lived with her husband had been destroyed as a result of the armed aggression against Ukraine. As her husband was the owner of the house, he submitted documents to claim compensation for the destroyed property. Following the review, her husband was granted a housing certificate, and the couple were awaiting the allocation of funds to purchase a new home. However, her husband passed away due to a serious illness, and a few days later, the funds were allocated to the certificate.

At present, the woman is unable to use the housing certificate, as the mechanism for inheriting the certificate, as provided for by law, is not implemented in practice.

Access to compensation remains severely restricted for individuals whose ownership rights to housing acquired prior to 2013 have not been entered in the State Register of Real Rights to Immovable Property. The loss or inaccessibility of BTI archives, and the

destruction of documents, force those affected to bring costly and protracted legal proceedings. Court fees in such cases can amount to up to five times the minimum subsistence level, placing a disproportionate financial burden on individuals who have already suffered property losses as a result of the war. Draft Law No. 11440 (Draft Law on Amendments to the Law of Ukraine “On State Registration of Real Rights to Immovable Property and Encumbrances Thereon” regarding the establishment of a mechanism for state registration of ownership rights to immovable property in the absence of access to the records of technical inventory bureaus) is currently under consideration by the Verkhovna Rada of Ukraine; aimed at introducing a mechanism for state registration of ownership rights in the absence of access to BTI materials; however, as of December 2025, it had not been adopted and had not been considered since December 2024, which indicates a lack of adequate response to a systemic problem.

The procedure for compensation for damaged common property in multi-apartment buildings, unfinished construction projects, and housing belonging to members of housing and construction cooperatives without formalised ownership rights remains unregulated; furthermore, there are no solutions for tenants of the state housing stock who did not manage to privatise their housing. Furthermore, the mechanism for compensation for repairs carried out at one’s own expense has not been implemented in practice, despite the existence of a legal basis.

Furthermore, although Law No. 2923-IX defines the RDDP as a system for recording both immovable and movable property, subordinate legislation does not actually provide for the recording of damaged or destroyed movable property, and the functionality of the Diia Portal only allows notifications to be submitted regarding residential properties. There is also no option to enter data on non-residential property. This discrepancy between the law, subordinate legislation and technical implementation limits the scope of the rights claimed by victims, places owners of movable and non-residential property in an unequal position, and creates risks that it may not be possible to seek further compensation, particularly under the international compensation mechanism.

(e) The Register of Damage Caused by the Aggression of the Russian Federation against Ukraine: Access, Submission of Claims and Challenges

The Register of Damages Caused by the Aggression of the Russian Federation against Ukraine, established in May 2023 under the auspices of the Council of Europe, provides a documentary record of claims for compensation for damages, losses and harm submitted by natural and legal persons, as well as by the State of Ukraine. According to the Council’s report on the Register of Damages for Ukraine for the fourth quarter of 2025, as of December 2025, 84,385 claims had been submitted to the Register, of which 30,461 had been registered. The Register covers both pecuniary and non-pecuniary damages across 43 categories. Individuals could submit claims in 14 categories of damage.

On 16 December 2025, the Convention Establishing an International Claims Commission for Ukraine was adopted. Once ratified by at least 25 states, the Convention will enter into force, marking the start of the formation of an International Claims Commission for Ukraine, which will be authorised to decide on claims and determine the amount of compensation.

However, an analysis of current practice indicates that obstacles remain in the form of the complexity of the application process and insufficient public awareness of the eligible categories of damage. Particularly vulnerable groups – people with disabilities, the elderly and those in difficult life circumstances – require additional practical support when submitting applications. The previous report recommended that central executive bodies and local authorities ensure cooperation with the Register and systematically inform citizens, regardless of their location, about the possibility of submitting claims. In 2025, these measures are in the process of being implemented, in particular through active awareness-raising work by the Register and the Commissioner’s Secretariat, which includes disseminating information via websites, social media, ASC and other channels of engagement with citizens. Throughout 2025, the Commissioner’s Secretariat, in conjunction with the Register, carried out awareness-raising and explanatory activities for citizens affected by the war: both in Ukraine and abroad, information and instructions on the procedure for submitting claims, etc., were regularly disseminated.

At the same time, there is currently no central executive body at the national level with responsibility for liaising with the Register of Damages for Ukraine. Certain aspects of this work are in fact carried out by various bodies: the MinJust ensures Ukraine’s participation in the establishment of the international compensation mechanism, whilst the MinDigital provides the technical capability to submit applications to the Register via the Diia Portal. However, the regulations of these bodies do not define their powers and responsibilities regarding interaction with the Register of Damages. This situation complicates inter-agency coordination, the systematic provision of information to citizens, and the organisation of applications to the Register.

(f) Guarantees of access to civil protection facilities and risks identified in connection with amendments to the MIA of Ukraine Order No. 579

During the reporting period, the Commissioner exercised parliamentary oversight over the observance of the human right to safety, the protection of life and access to civil protection facilities in light of the amendments made to the MIA of Ukraine Order No. 546 of 12 August 2025 “On Amendments to the Order of the Ministry of Internal Affairs of Ukraine No. 579 of 9 July 2018”. These amendments were adopted without consultation with the Commissioner, which made it impossible to carry out a prior assessment of their compliance with human rights standards.

In particular, the current version of the Requirements provides for the possibility of business entities maintaining protective structures on the basis of contracts with balance sheet holders, which, in the Commissioner’s view, creates risks of legal uncertainty and potential blurring of responsibility for the proper technical condition of shelters. Despite the MIA’s position that liability in any case rests with the owners and balance sheet holders in accordance with the Civil Protection Code of Ukraine, such a model may complicate the process of holding parties accountable in the event of shelters being unfit for use and give rise to disputes between local authorities, balance sheet holders and contractors.

Additional risks are associated with the provision stating that the equipping of the simplest shelters with utility networks and equipment is carried out ‘at the discretion of the balance sheet holder’. This approach effectively leaves the issue of minimum safety

standards to the discretion of the owners and may lead to significant differences in the level of protection for the population across different communities. Although the MIA of Ukraine justifies this by the need to preserve the stock of shelters and the impossibility of retrofitting all facilities, we emphasise that the absence of clearly defined mandatory minimum requirements creates risks to the realisation of the right to life and safety.

Thus, during 2025, staff of the Commissioner's Secretariat monitored 1,066 civil protection facilities, 80 of which were found to be non-operational. Following the monitoring visits, 3,996 recommendations were issued, of which 1,485 (37%) have been implemented.

Region	Inspections carried out	Recommendations issued	Recommendations implemented	% of implementation
Vinnitsia	35	192	164	85
Volyn	44	99	19	19
Dnipropetrovsk	48	144	14	9
Donetsk	5	15	1	7
Zhytomyr	33	140	5	3,6
Zakarpattia	59	543	169	31
Zaporizhzhia	43	199	24	12
Ivano-Frankivsk	50	212	93	44
Kyiv city	125	373	99	27
Kyiv	61	250	36	14
Kirovohrad	44	107	4	4
Lviv	48	137	0	0
Mykolaiv	43	65	27	42
Odesa	60	245	71	29
Poltava	41	98	66	67
Rivne	50	256	140	55
Sumy	44	70	27	39
Ternopil	30	92	59	64
Kharkiv	35	107	41	38
Kherson	13	74	44	59
Khmelnyskyi	56	207	120	58
Cherkasy	46	127	101	80
Chernivtsi	35	194	143	74
Chernihiv	18	52	24	46
Total	1,188	3,996	1,485	40.6

Most of the recommendations made by the monitoring teams concerned basic needs, in particular:

- provision of first-aid kits;
- provision of barrier-free access (ramps, handrails, etc.);
- provision of water supplies (at a rate of at least 2 litres per person per day);
- installation of signs and markers (routes to shelters);
- provision of seating (benches, chairs).

There were also instances where shelters required major repairs and significant alterations, as staying in them is not only uncomfortable but sometimes even dangerous.

During monitoring visits and analysis of open data, discrepancies were identified in the information regarding civil defence shelters in the Ivano-Frankivsk region. In particular, in three cases, the shelters listed in official records did not actually exist, whilst in the Burshtyn community, there were actually 37 facilities instead of the three listed.

Following this, the Ivano-Frankivsk RMA updated the information on shelters on its official website.

During a monitoring visit to shelters in Kyiv city, it was found that one of the shelters is located in the basement of a museum, which is in fact used as a shelter only for museum visitors whilst the museum is open. At the same time, the map of shelters indicates that access to it is provided round the clock, which does not meet the requirements for unimpeded public access to shelters.

In view of the above, the Commissioner's Secretariat recommended that the issue of the appropriateness of including the said premises in the civil protection facilities fund be considered.

The shelter in question continues to be listed on the map of shelters in the city of Kyiv, which may mislead the public as to its usability during an air raid alert.

1.2. Safeguarding the Rights of IDPs

(a) Overview of the situation and key trends

In 2025, state policy on IDPs was undergoing institutional transformation, which significantly affected the pace of developing and implementing key decisions in this area. In December 2024, the MinReintegration was renamed the MNE, and responsibilities regarding IDPs, as well as the TOT, were transferred to the MTD. Just one year later, on 10 December 2025, by a Government decision (KMU Resolution No. 1636 of 10 December 2025 "Certain Issues Concerning the Ministry of Social Policy, Family and Unity") the MSPFU was designated as the central executive body responsible for formulating and coordinating state policy on internally displaced persons. This transfer of powers will require strengthening the institutional capacity of the responsible body and effective inter-agency coordination, taking into account the need to preserve institutional memory and previously developed solutions.

The issue of updating the State Policy Strategy on Internal Displacement and the operational plan for its implementation remains relevant, given the expiry of the current Strategy. This was specifically highlighted within the framework of the expert council under the Representative (Deputy) of the Commissioner for the Rights of Citizens who are Victims of the Armed Aggression against Ukraine. The process of developing a new draft, which was initiated in September 2025 by the MTD, was continued by the MSPFU without an official announcement of the working group's activities. The draft prepared by the experts had not been officially presented by the end of 2025, despite the obligation to do so by 31 December in accordance with the Government's Action Plan. Consequently, the recommendation identified in the previous period was not implemented in this regard.

An important element in shaping an effective policy on IDPs is the updating of relevant legislation. Draft Law No. 12301 provides for a new version of the Law of Ukraine "On Ensuring the Rights and Freedoms of Internally Displaced Persons". This draft law was recommended for adoption in the previous reporting period but was not considered in the second reading.

(b) Specific aspects of population evacuation

The procedure for carrying out mandatory evacuation of the population from areas where hostilities are taking place or are likely to occur is governed by Resolution No. 841 of the Cabinet of Ministers of Ukraine. A continuing challenge is ensuring adequate accommodation for evacuees, particularly those with reduced mobility, people with disabilities and elderly people who require inpatient care and supported living. In 2025, civil society organisations continued to perform a significant proportion of the functions relating to the evacuation and subsequent accommodation of such persons, using their own and donor resources. The capacity of non-governmental organisations to find, set up and maintain temporary accommodation is gradually being exhausted, whilst regional military administrations report a lack or critical shortage of suitable places. Current state strategic documents, in particular the Strategy for Reforming Psychoneurological Care Homes, Other Care Facilities, and De-institutionalisation of Care of Persons with Disabilities, the Elderly by 2034, do not set out solutions for the needs of mass evacuation of people requiring inpatient care under martial law.

At the same time, the insufficient level of public awareness regarding available support mechanisms during and after evacuation significantly affects people's willingness to agree to relocation and to comply with mandatory evacuation orders. In practice, a significant proportion of refusals to evacuate are not due to a rejection of the necessity of relocation itself, but to a lack of clear, reliable and timely information regarding conditions of subsequent accommodation, access to social, medical, educational and legal services, as well as guarantees regarding the preservation (receipt) of benefits and property rights. This problem is particularly acute among families with children, the elderly, people with disabilities and other groups with limited mobility, for whom uncertainty regarding living conditions after evacuation becomes a key deterrent.

In view of this, the state must ensure the provision of a sufficient number of temporary accommodation places with residential care for evacuees requiring constant assistance,

and step up public awareness of the support mechanisms available during and after evacuation.

(c) Registration of IDPs

According to the results of the Commissioner's monitoring in 2025, a decrease was recorded in the number of people registered as internally displaced, against the backdrop of a further deterioration in the security situation in frontline regions and the continuation of mass population evacuations. This trend does not correlate with actual migration processes and may indicate systemic problems in the mechanisms for registering IDPs.

The practice of social protection authorities indicates a formalistic approach to assessing proof of residence, which fails to take into account the specific features of the educational process, in particular distance or blended learning, as well as objective limitations on the ability to provide documentary evidence of residence in the temporarily occupied territories. Consequently, this situation leads to a breach of the principle of equality in access to registration as an IDP and to social guarantees, and highlights the need to review regulatory frameworks to account for the specific nature of youth displacement.

According to the MSPFU, a significant proportion of deregistrations occur at the initiative of the individuals themselves via the Diia Portal mobile app; specifically, between 1 March 2024 and 1 January 2026, 534,000 people deregistered without giving a reason.

The lack of reliable and detailed statistics on the reasons for deregistration significantly limits the state's ability to forecast needs, plan social expenditure, provide humanitarian aid, and develop integration and return policies.

In the previous annual report, the Commissioner recommended that the Ministry of Social Policy, Family and Unity of Ukraine and the Ministry of Digital Transformation of Ukraine draft and submit to the Cabinet of Ministers of Ukraine a proposal for amendments to the KMU Resolution of 1 October 2014 No. 509 "On the Registration of Internally Displaced Persons" to ensure the option to select reasons for deregistration via the Diia Portal mobile app. Although the relevant provisions are formally provided for in the Procedure as amended on 4 April 2025 (KMU Resolution No. 376 of 4 April 2025 On Amendments to the Procedures Approved by KMU Resolutions No. 509 of 1 October 2014 No. 509 and 22 September 2016 No. 646), as of the end of 2025 the technical implementation of this provision remains absent, and the necessary regulatory and digital solutions have not been implemented. Furthermore, the information messages in the Diia app give users the false impression that an IDP certificate can only be renewed in the event of repeated displacement from combat zones or TOT, which does not comply with current legal regulations and creates risks of unjustified refusal to register a person as an IDP.

(d) Social payments to IDPs

Throughout 2025, the Ukrainian Parliament Commissioner for Human Rights received 1,180 appeals from IDPs regarding violations of their right to receive social payments in full and on time, including subsistence allowances, pension payments, and the additional allowances provided for residents of mountainous areas.

The appeals were related to the transfer, from 1 July 2025, of the administration of state social benefits from social protection authorities to the PFU. Despite the establishment of statutory deadlines for compiling payment schedules and making payments, widespread delays were recorded across Ukraine, caused by technical issues, the adaptation of information systems, and a lack of proper inter-agency coordination. Following the transfer of powers, social protection authorities lost the ability to amend data in the Unified Information System for the Social Sphere, having only read-only access, whilst the PFU's regional offices did not possess full information regarding previous decisions and errors in recipients' personal files.

In October 2025, a woman contacted the Commissioner to report that on 30 July 2025 she had approached the PFU in Lviv region to renew her details in order to continue receiving benefits. She provided all the necessary documents. She has been waiting for her benefits to be reinstated for four months now. She had not been provided with any written refusals.

Only after the Commissioner's intervention and the submission of a number of enquiries was the applicant's entitlement to benefits confirmed in December 2025 and the appropriate amount of benefits paid.

A significant challenge remains the inconsistent application of the provisions of the Procedure for the Provision of Living Allowances to IDPs, approved by KMU Resolution No. 332 adopted on March 20, 2022, titled "Some Issues of Payment of Accommodation Allowance to Internally Displaced Persons". Among the gaps is the provision of payments to persons who have reached the age of 60 but are not entitled to a pension or state social assistance, which leads to refusals to pay both such persons and members of their families.

In March 2025, a citizen appealed to the Commissioner regarding the protection of her right to receive subsistence assistance for IDPs (hereinafter – assistance), stating in particular that she had been refused payment of the assistance because her husband, who is a member of her family, has no income and does not receive a pension, and had not acquired the right to receive state social assistance in accordance with the Law of Ukraine "On State Social Assistance to Persons Not Entitled to a Pension and Persons with Disabilities" or the Law of Ukraine "On State Social Assistance to Persons with Disabilities from Childhood and Children with Disabilities" (except for persons with disabilities of Groups I and II).

Thus, in accordance with the requirements of paragraphs 13-1 and 13-4 of Procedure No. 332, the payment of assistance is extended for a second six-month period to pension recipients whose pension does not exceed four times the subsistence minimum for persons who have lost their ability to work, as of 1 January of the year in which the decision to grant assistance is made.

In other words, on the one hand, the state provides for state support to persons who have reached the age of 60 and are not entitled to pension payments. On the

other hand, it deprives such persons, in particular their family members, of the right to receive state support, given that they have no income whatsoever.

Given that the situation with the applicant's family clearly demonstrated a conflict in the practical application of the provisions of Procedure No. 332, a request was sent to the MSPFU seeking clarification on the application of the aforementioned provision of Procedure No. 332, or amendments to avoid ambiguous interpretation and to resolve the issue.

Following the provision of the relevant clarifications by the MSPFU to the PFU, the issue regarding the award of benefits to this citizen was resolved. However, it cannot be ruled out that the situation may recur following the transfer of functions relating to the granting of benefits to the PFU.

Furthermore, there are issues regarding the resumption of payments to individuals who have evacuated independently from areas where an evacuation order has been issued. Although the current Procedure provides for such persons' right to receive assistance provided they meet the established criteria, in practice the realisation of this right effectively depends on the inclusion of IDPs in the formalised lists of regional state (military) administrations. This leads to demands for additional proof of residence, delays in decision-making and the late resumption of payments for reasons beyond the recipients' control, as a result of which IDPs lose the opportunity to exercise their guaranteed right to receive assistance within the specified six-month period.

A systemic problem remains the lack of a mechanism for resuming payments from the date of their suspension in cases where IDPs have a justified reason for staying abroad beyond the established time limits. Currently, the legislation provides only for a reapplication for the allocation of assistance, which automatically deprives individuals of payments for the previous period even in the presence of confirmed objective reasons. This approach is disproportionate, fails to take into account the real-life circumstances of IDPs and is effectively punitive in nature. Combined with the lack of inter-agency information exchange between the PFU, military administrations and local authorities, this creates additional barriers to accessing social protection and increases the risk of similar violations recurring in the future.

The issue of calculating additional payments for residents of mountainous settlements, including IDPs, requires separate attention. The Law of Ukraine "On the Status of Mountainous Settlements in Ukraine" guarantees a 20 per cent increase in pensions, scholarships and other forms of state financial assistance. At the same time, in practice, numerous complaints are received regarding the refusal to grant these payments to IDPs. Two draft laws aimed at resolving this issue have been registered in the Verkhovna Rada of Ukraine (Parliament), but they differ significantly in their approaches: draft law No. 12300, which was recommended for adoption in the previous reporting period, is targeted in nature and provides for the recognition of an IDP certificate as sufficient proof of residence in a mountainous settlement, whereas draft law No. 13237 proposes a comprehensive reform of the social protection system for mountainous areas.

Another systemic problem is the lack of comprehensive and long-term solutions to support IDPs once the period for receiving subsistence assistance has ended. In fact, once the specified periods for benefit payments have expired, the state does not offer alternative and effective support mechanisms, particularly in the form of affordable accommodation services or sustainable housing programmes. Resolving the housing issue remains one of the key needs of IDPs after security, and the initial six-month period of receiving assistance, during which a person has the opportunity to partially stabilise their situation, is not accompanied by further tools for integration and self-sufficiency.

The Commissioner also notes that the recommendation from the previous reporting period regarding the revision of the mechanism for allocating housing assistance to IDPs, with the extension of its payment until the lifting of martial law, remains unimplemented. The lack of systemic changes in approaches to social support for IDPs, as well as insufficient coordination of actions between executive authorities, creates risks of violating the principles of equality, legal certainty and accessibility of social guarantees for the most vulnerable groups of the population.

Furthermore, during the previous period, two recommendations were made concerning the payment of pensions to IDPs. These recommendations were partially implemented. Following a lengthy process, on 11 February 2025, the Government approved Resolution No. 299 “On Certain Features of the Payment of Pensions (Monthly Lifetime Financial Assistance) and Insurance Benefits under Insurance against Accidents at Work and Occupational Diseases Resulting in Loss of Working Capacity” (which came into force on 20 March 2025), thereby abolishing the requirement for IDPs to receive pensions exclusively through JSC Oschadbank, and removing the obligation to obtain a certificate of IDP registration for persons who have left the temporarily occupied territories and reside in territory controlled by Ukraine. Furthermore, it has been stipulated that the payment of pensions to persons residing in the temporarily occupied territories (regardless of the date of occupation) is subject to the completion of physical identification by 31 December of each calendar year, which may be carried out in person at the territorial offices of the PFU, remotely via the PFU web portal using ‘Diia. Signature’ or via video link. The adoption of this resolution marked an important step towards ensuring a fairer and more consistent approach to the realisation of pension rights for those affected by armed aggression.

(e) Housing provision for IDPs

Given the decline in the number of aid recipients and the lack of systematic measures to provide housing, the MSPFU launched a pilot project at the end of January 2025 to provide subsidies towards the cost of renting residential premises and to compensate landlords for tax liabilities (Resolution of the KMU No. 1225 of 25 October 2024 “On the Implementation of a Pilot Project to Provide Subsidies to Cover the Cost or Part of the Cost of Renting Residential Premises (or Part of Residential Premises) and to Compensate for Part of the Personal Income Tax or the Single Tax and Military Levy”). The project is designed to run for two years and aims to support IDP households that spend more than 20 per cent of their total income on rent; however, this is not the sole criterion for eligibility. The status of the programme’s implementation in 2025 revealed significant limitations in the practical accessibility of the mechanism and its minimal

impact on the overall need for housing support for IDPs. According to the MSPFU, since the launch of the project, 249 applications have been registered, 114 payments have been made (to 151 IDPs), with an average amount of 5,048.2 hryvnias.

Nevertheless, the experimental nature of the project and the restriction of support to no more than two six-month periods do not resolve the issue of sustainable housing provision. Upon completion of their participation in the programme, IDP families may once again find themselves without any form of state support. In this regard, there remains an urgent need to develop a long-term housing policy for IDPs, in particular through the parallel implementation of credit and investment programmes in partnership between the state and international financial organisations and donors, the development of a social housing fund, and the introduction of sustainable public-private partnership mechanisms in the field of housing construction and renovation, etc.

There remains no centralised register of temporary accommodation facilities that would reflect their actual condition, occupancy levels and readiness, particularly those established using international donor funds. The lack of systematic monitoring and control leads to the inefficient use of resources, a shortage of places for people with reduced mobility and people with disabilities, as well as the misuse of premises. In particular, during monitoring visits in Zakarpattia region, it was established that at least two facilities located in the village of Dubrynychy were renovated and equipped with the support of international and charitable organisations, notably the Ukrainian Red Cross Society, yet for a long time they have not been functioning as temporary accommodation for IDPs and are not included in the region's official list of PTR.

A key problem remains the lack of a stable and predictable mechanism for compensating costs for housing and communal services in PTR. Resolution of the Cabinet of Ministers of Ukraine No. 616 of 27 May 2025 "Certain Issues Concerning the Provision of State Support for the Accommodation of Internally Displaced Persons" establishes the procedure for providing state compensation for housing and utility costs to legal entities, individual entrepreneurs and other institutions providing free accommodation to IDPs. At the same time, in practice, compensation is provided based on social consumption standards that do not correspond to actual volumes in IDP accommodation centres and do not cover the full cost of housing and communal services. According to 2025 data, no more than 40% of IDP accommodation centres actually make use of the compensation mechanism, which reduces the incentive for facility operators to open new centres or continue operating existing ones. Practical cases, particularly in Zakarpattia region, demonstrate the critical inadequacy of the mechanism: from May to December, the community spent 690,000 UAH on housing and communal services for IDPs, yet received only 174,700 UAH in compensation. Furthermore, technical issues with the Pension Fund of Ukraine's software have been identified, making it impossible to submit compensation claims correctly in communities with more than one PTR.

1.3. Safeguarding the Rights of Residents of Temporarily Occupied Territories

(a) Overview of the situation and key trends

The prolonged temporary occupation of part of Ukraine's territory has a systemic and cumulative impact on the ability of Ukrainian citizens living in these areas to exercise their rights. This concerns not only objective restrictions on access to public services, justice, social protection and education, but also the gradual weakening of ties between citizens in the occupied territories and those in the territory controlled by Ukraine, as well as with the Ukrainian state itself. According to the analysis set out in the Commissioner's Special Report on the situation in the territories of Ukraine temporarily occupied by the Russian Federation, human rights violations in the TOT are not sporadic but systematic in nature and are used by the aggressor state as a tool to seize and maintain control over the population and territories. Particular attention must be paid to the consequences of the more than eleven-year occupation of the Autonomous Republic of Crimea and the city of Sevastopol, as well as certain districts of the Donetsk and Luhansk regions. The tragedy in Mariupol is a stark illustration of the scale of these violations: according to available estimates, at least 22,000 civilians were killed in the city, of whom 12,500 have already been verified under the Mariupol Justice initiative.

The Law of Ukraine "On Ensuring the Rights and Freedoms of Citizens and the Legal Regime in the Temporarily Occupied Territory of Ukraine" sets out the basic principles of state policy regarding the TOT. In 2025, the MTD began updating it through the work of a task force comprising representatives of the Commissioner's Secretariat. An analysis of state strategic documents, legislative initiatives and law enforcement practice indicates a lack of a coherent and consistent vision for state policy regarding residents of the TOT.

The unpredictability and reactive nature of individual legislative decisions, as well as the absence of a clearly formulated vision for the future of these territories and their residents, create risks of further weakening citizens' ties with the state. In a situation where the aggressor state is pursuing a deliberate policy of forced integration, the imposition of citizenship and the suppression of Ukrainian identity, the very preservation of such ties must be regarded as one of the key elements of national resilience and the protection of human rights. The Special Report emphasises that for the RF, the occupation was never viewed as a temporary measure, and the policy of 'transforming' Ukrainian citizens into a loyal and silent population is part of their long-term state strategy.

Certain legislative initiatives and political debates increasingly focus on residents of the TOT, primarily through the prism of security risks associated with the fact of residing in the TOT or with the forced acquisition of citizenship of the aggressor state.

Certain provisions of national legislation require further analysis and amendment, particularly regarding criminal liability for collaboration, in order to prevent the disproportionate restriction of the rights of persons who were under duress.

In this regard, there is an urgent need for the Cabinet of Ministers of Ukraine to develop a comprehensive framework for state policy regarding the temporarily occupied territories and their inhabitants, which would balance the state's security interests with the priority of protecting human rights, set out clearly defined objectives for maintaining ties with citizens under occupation, coordinated the actions of central executive bodies, and took into account the long-term consequences of prolonged occupation for reintegration processes.

(b) Nationalisation of property and compulsory passportisation in the TOT

People living in the TOT are under constant pressure from the aggressor state's coercive policies, which effectively deprive them of any real freedom of choice and force them to choose between obtaining a Russian passport, leaving the TOT, or facing the risk of persecution, deportation and restricted access to basic services if they reside without documents issued by the occupying authorities. Such practices constitute a gross violation of international humanitarian law and are aimed at legitimising the illegal occupation by artificially altering the demographic composition of the population and forcibly imposing citizenship.

The Commissioner has repeatedly emphasised that forced passportisation is a tool used to give the crimes of the occupying authorities a 'humane' appearance for an international audience and is used as a mechanism for further coercion, in particular to involve Ukrainian citizens in illegal mobilisation. The supposed 'voluntary' nature of this process is a fiction, as refusal to obtain a Russian passport entails a threat to life, liberty and access to livelihoods. The completion of 'simplified passportisation procedures' in certain areas of the TOT in 2025 and the transition to complex and humiliating procedures for confirming 'right of residence' creates additional risks of deportation and legal uncertainty, particularly for those who have categorically refused to acquire citizenship of the aggressor state.

In parallel with forced passportisation, the occupying authorities have launched a systematic and targeted policy of unlawfully depriving Ukrainian citizens of their property rights. On the basis of so-called 'laws' on the recognition of 'ownerless property' in the temporarily occupied territories of the Luhansk, Donetsk, Zaporizhzhia and Kherson regions, residential property is being registered, unilaterally declared 'abandoned', and subsequently transferred to the 'municipal ownership' of the occupying administrations. To prevent so-called 'nationalisation', owners are effectively forced to register their property rights in Russian state registers, which is impossible without obtaining a Russian passport. Thus, property rights are being used as a tool of further coercion to compel passportisation and legitimise the occupation regime.

This practice was further enshrined in law after the State Duma of the Russian Federation, on 9 December 2025, adopted in its second and third readings draft law No. 1052810-8 "On Amendments to Certain Federal Constitutional Laws", which provides for the further 'regulation' of property relations in the temporarily occupied territories of Ukraine. In effect, this draft law institutionalises the practices of unlawful seizure of property and creates additional mechanisms of pressure on the civilian population, which contravenes the norms of international humanitarian law.

Such actions constitute a direct violation of the Convention for the Protection of Human Rights and Fundamental Freedoms and the Constitution of Ukraine, whilst attempts by citizens to return to the TOT to 'protect' their property pose an immediate threat to their lives, liberty and security and may lead to further forms of persecution by the occupying administration.

Indeed, in 2025 alone, the Commissioner received 106 appeals regarding the illegal seizure of property in the temporarily occupied territories (51 from Zaporizhzhia region, 22 from Kherson region, 23 from Donetsk region, and 10 from Luhansk region).

The Commissioner received an appeal from a citizen who had left the TOT of Donetsk region. According to neighbours who remained in the TOT, Russian military personnel moved into the woman's home without her permission and without any legal grounds, effectively depriving her of the ability to possess and dispose of her own property.

In response, the Commissioner's Secretariat sent a letter to the Office of the Prosecutor General, the Security Service of Ukraine and the Ministry of Internal Affairs of Ukraine; following consideration of this letter, the Main Directorate of the National Police in Donetsk region added the letter to the case file of the criminal proceedings under Part 438 of the Criminal Code of Ukraine.

The Commissioner emphasises that Ukraine does not recognise any documents imposed by the occupying authorities, and calls on the international community to consistently condemn the practice of forcibly imposing citizenship and the unlawful deprivation of property as elements of the RF's systematic policy aimed at consolidating the results of the occupation and displacing the Ukrainian presence from the temporarily occupied territories.

(c) Registration of civil status acts occurring in TOT

In 2025, the sole mechanism for registering civil status acts (births, deaths) occurring in TOT remains the judicial procedure in accordance with Article 317 of the Civil Procedure Code of Ukraine. Despite the Government's claims that the procedure is simplified, its application in practice demonstrates excessive delays in case processing (ranging from two to six months), instances of unlawful demands to pay court fees, the need for professional legal assistance and additional financial costs; this is further complicated by the overburdening of the courts.

The draft law on amendments to certain legislative acts of Ukraine regarding the specifics of state registration of civil status acts that took place in the territory of Ukraine temporarily occupied by the Russian Federation and outside Ukraine, which provided for an administrative procedure for the recognition of civil status acts in the temporarily occupied territories and was recommended for adoption in the previous report, was withdrawn in July 2025 due to a change of Government.

At the same time, there is a trend towards a decrease in the number of court decisions serving as the basis for the state registration of civil status acts, which is linked to the limited access of residents of the TOT to the territory controlled by the Government of Ukraine and the difficulty of physically accessing the courts. Even a judicial mechanism that is formally accessible loses its effectiveness in practice.

Year	Number of registered births	Number of registered deaths
2016	9,818	10,380
2017	11,125	14,998

2018	11,255	20,344
2019	11,359	24,127
2020	5,391	13,458
2021	5,948	19,494
2022	3,213	4,323
2023	4,824	6,406
2024	1,424	5,237
2025	860	4,879

During a meeting of the expert council convened by the Representative (Deputy) of the Commissioner for the Rights of Citizens who are Victims of the Armed Aggression against Ukraine, held on 25 September 2025, representatives of the MinJust reported that, as part of the preparation of a new draft law, consideration is being given to establishing a list of documents that may serve as grounds for the state registration of civil status records. The proposed approach involves taking into account any documents that actually confirm the event, regardless of the issuing authority, provided that a special administrative procedure and clear regulatory framework are introduced for state registration bodies. At the same time, the need to introduce effective safeguards against abuse has been emphasised, in particular mechanisms for checking the authenticity of documents, verifying identity using state registers, and the possibility of collegial review of certain categories of cases. Current legislation already provides for criminal liability for the forgery and use of forged documents, which may serve as an additional deterrent.

During the reporting period, the MinJust did not submit the text of the relevant draft for approval.

Moreover, civil status documents are not the only documents issued in the temporarily occupied territories that have a significant impact on the ability to exercise human rights, both in the short term and after de-occupation. This concerns, in particular, medical documents, property title deeds, court decisions and other records, the absence or complete disregard of which significantly restricts citizens' access to education, social protection, inheritance, compensation for damages and other fundamental rights (Analytical Note "What approaches might be taken regarding documents issued under occupation?"). In this context, the state needs to review its approach of completely refusing to recognise any documents issued under occupation and to introduce mechanisms for using information from certain types of such documents, with appropriate safeguards.

(d) Access to education and social support for young people from the TOT

Ensuring that children and young people from the TOT have access to education and social support remains one of the key tools for maintaining their connection with the Ukrainian state and a priority factor in encouraging them to leave the occupied territories.

In the context of the aggressor state's systematic policy aimed at forced integration and the suppression of Ukrainian identity, the state must develop a comprehensive education policy covering all levels of education and stages of adaptation following displacement. This was emphasised in the Commissioner's Special Report on Access to Education for Children and Youth from the Temporarily Occupied Territories (TOT), presented in February 2025, which provided 29 recommendations to state authorities aimed at removing systemic barriers to access to education for children and young people from the TOT and related social guarantees. As the analysis of the implementation of these recommendations shows, as of December 2025, only 52% of the recommendations had been implemented, 41% were in the process of being implemented, whilst 7% of the recommendations addressed to the Cabinet of Ministers of Ukraine remained unimplemented, indicating an inadequate response by the responsible state authorities to the identified systemic problems. This state of implementation of the recommendations, in particular, points to the absence of an effective state policy in the sphere of ensuring access to education for children and young people from the TOT, the formulation and implementation of which falls within the remit of the MON.

An analysis of the current regulatory framework and the practices of central executive bodies reveals the absence of a comprehensive strategic document that would systematically define the state's approaches to ensuring access to education and social support for children and young people from the TOT, including issues such as resuming education, the learning process, social guarantees, psychological support and further integration, etc.

As evidenced by monitoring results and appeals to the Commissioner, the number of applicants from the TOT to educational institutions continues to decline, despite the existence of simplified admission procedures via the 'Crimea-Ukraine' and 'Donbas-Ukraine' educational centres. According to official data from the MON, the trend in enrolment of graduates from the TOT of Donetsk and Luhansk regions, the Autonomous Republic of Crimea and the city of Sevastopol, as well as Kharkiv, Zaporizhzhia, Kherson and Sumy regions in 2016-2025 was as follows: in 2016 – 1,008 people, in 2017 – 1,550 people, in 2018 – 1,776 people, in 2019 – 1,865 people, in 2020 – 2,026 people, in 2021 – 2,083 people, in 2022 – 7,018 people, in 2023 – 6,516 people, in 2024 – 11,325 people, in 2025 – 9,418 people. These statistics also include people from settlements on the contact line and in areas of active hostilities. The main barriers remain a lack of awareness among applicants, difficulties in processing documents, and the absence of systematic adaptation programmes and financial support. At the same time, educational centres require institutional reform and transformation into a single coordination mechanism, with the implementation of targeted information campaigns (Analytical report based on the results of a sociological study on the integration of students from the temporarily occupied territories of Ukraine into higher education institutions, prepared by the research agency Info Sapiens on behalf of the Almenda Centre for Civic Education (Almenda CCE) at the request of the Ukrainian Parliament Commissioner for Human Rights).

A positive step was the approval on 15 July 2025 by the Cabinet of Ministers of Ukraine of the Procedure for the recognition of learning outcomes obtained in the temporarily occupied territory of Ukraine at the levels of vocational (vocational-technical), pre-higher and higher education in accordance with the requirements of Law

of Ukraine No. 3482-IX. This was recommended in the previous reporting period. The practical implementation of this mechanism requires further monitoring, particularly regarding the readiness of educational institutions to apply recognition procedures and ensure genuine access for young people to further education and employment. The lack of effective implementation of such a mechanism creates risks of social isolation and a loss of professional potential for the state. Furthermore, the Procedure for the recognition at the level of full general secondary education of learning outcomes achieved in the TOT has not yet been adopted.

The implementation of social guarantees for children and young people who have returned from deportation or left the TOT requires particular attention. In 2025, the practical implementation of the mechanism for providing one-off relocation assistance began in accordance with Resolution No. 1295 of the KMU of 1 October 2025 “Certain issues regarding the protection of the rights of children who have been deported or forcibly displaced, or were at risk of deportation and/or forcible displacement as a result of the Russian Federation’s armed aggression against Ukraine, and persons from among them”, yet the absence of a systematic information campaign and clear inter-agency coordination limits potential recipients’ awareness of the available guarantees. Furthermore, the age criteria and procedural aspects of access to assistance were limited to 18 years of age. Changes (raising the age limit to 23 years) in this regard were introduced in October 2025, i.e. after the application campaign had concluded.

As of the end of 2025, the implementation of Resolution No. 1295 of the Cabinet of Ministers of Ukraine is being carried out within the framework of the mechanisms defined by Resolution No. 551 of the KMU of 14 May 2024 “On the Approval of the Procedure for the Identification, Return, Provision of Support and Reintegration of Children, who have been deported or forcibly displaced, or were at risk of deportation and/or forcible displacement as a result of the Russian Federation’s armed aggression against Ukraine, or persons from among children”, with the involvement of civil society organisations and charitable organisations in the drafting and implementation of individual plans for the return and reintegration of children and persons from among them.

The State Service of Ukraine for Children’s Affairs has paid a one-off relocation allowance to 8 children aged between 18 and 23, whilst 156 legal representatives have received such assistance for 220 children. At the same time, 31 applications from children were under consideration, indicating a significant imbalance in the implementation of this guarantee.

However, current regulations do not provide a clear and accessible mechanism for applying for and receiving such assistance for persons aged 18 to 23 who have returned from the TOT or after deportation.

Furthermore, a mandatory condition for the allocation of relocation assistance is the existence of an individual plan of measures for the return and reintegration of the child or young person. In practice, this requirement significantly restricts access to this guarantee, as a significant proportion of persons aged 18 to 23 decide independently to leave the TOT or return to territory controlled by Ukraine without going through a formalised return procedure, within which a corresponding individual plan is drawn up.

As a result, such individuals, whilst effectively finding themselves in a situation involving deportation, forced displacement or residence in the TOT, are unable to avail themselves of the social guarantee provided by the state.

Despite the existence of individual regulatory decisions and policy initiatives, state policy on ensuring access to education and social support for children and young people from the TOT remains unsystematic and not integrated into a single strategic framework.

The lack of a coordinated approach at Government level limits the effectiveness of the mechanisms already in place, complicates inter-agency coordination and fails to ensure continuous support for children and young people at all stages – from leaving the occupied territories to education and subsequent integration into Ukrainian society.

(e) The inability of IDP students to receive both a living allowance and subsidised accommodation in dormitories

The situation regarding the provision of adequate state support for IDP students, including those from the TOT, remains problematic. In most cases, such students continue their studies at educational institutions whilst living in student dormitories due to a lack of permanent housing and limited financial means. In the absence of academic or social scholarships, the only stable source of income for this category of students is the living allowance provided in accordance with Resolution No. 332 of the Cabinet of Ministers of Ukraine dated 20 March 2022. However, the current legal framework, namely Resolution No. 975 of the Cabinet of Ministers of Ukraine of 23 November 2016 “On the Provision of State Targeted Support to Certain Categories of Citizens for the Acquisition of Vocational, Pre-Higher and Higher Education”, stipulates that subsidised or free accommodation in student dormitories for IDPs is only possible provided that they do not receive such assistance.

The state effectively forces IDP students to choose between two mutually exclusive forms of support – financial assistance or subsidised accommodation in a dormitory. This approach fails to take into account the real-life circumstances of young people affected by armed aggression, contradicts the principles of fairness and equal access to state guarantees, and makes comprehensive support for this vulnerable group impossible. The consequence of this is an increase in the social vulnerability of IDP students, heightened risks of social exclusion, difficulties in accessing education, and the creation of additional barriers to integration into a new environment.

An analysis of the responses from central executive bodies indicates a lack of a coordinated inter-agency position and a shifting of responsibility between the bodies responsible for shaping social and educational policy. In view of the above, the Commissioner considers it necessary to initiate a review of the current regulatory framework to ensure that students who are internally displaced persons can simultaneously exercise their right to preferential (free) accommodation in dormitories and receive living allowances, as part of comprehensive and targeted state support for young people affected by the war.

(f) Issues regarding the registration/declaration of residence for citizens in the TOT

An analysis of the appeals revealed a systemic problem with the exercise of the right to register or declare their place of residence by Ukrainian citizens who were registered in the TOT prior to 2022.

Following the entry into force of the Law of Ukraine “On the Provision of Public (Electronic Public) Services for the Declaration and Registration of Residence in Ukraine” and the introduction of a new model for registering residence via local authority registers, these registers became the sole official source of address verification. At the same time, in the TOT, where at the time of the reform’s implementation state and local government bodies were not exercising their powers, territorial communities and the relevant registers had not been established, and the transfer of files from the SMS had not taken place.

As a result, citizens holding valid Ukrainian passports with details in the Unified State Demographic Register regarding their place of residence in the TOT are effectively unable to confirm their address, submit a declaration of residence via the ASC or the Diia Portal, or obtain an extract from the territorial community register. This leads to restricted access to education, social benefits, administrative services, inheritance procedures and other rights.

Typical cases include refusals to confirm residence in the TOT for the purpose of preferential admission to educational institutions, as well as the inability to register the place of residence of newborn children at the address of parents registered in the TOT. Similar problems are confirmed by appeals from regional military administrations, in particular that of Luhansk, which has sent an official appeal to the Commissioner.

In view of the above, it is necessary to introduce a temporary procedure for confirming residence for citizens registered in the TOT, where registers of territorial communities have not been established or are not functioning, with the possibility of using information from the Unified State Demographic Register and/or an internally displaced person’s certificate as valid proof of address. To resolve this issue, the Commissioner has written to the Prime Minister of Ukraine regarding the need to draft amendments to the legislation, involving the MinDigital, the SMS, the MIA and the MinJust, to address the legal loophole that disproportionately restricts the rights of Ukrainian citizens affected by the prolonged occupation.

RECOMMENDATIONS:

To the Verkhovna Rada of Ukraine (Parliament):

to expedite consideration of the draft Law of Ukraine, Register No. 13136 of 26 May 2025, “On Amendments to the Law of Ukraine “On Compensation for Damage to and Destruction of Certain Categories of Immovable Property as a Result of Hostilities, Terrorist Acts and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine, and the State Register of Damaged and Destroyed Property as a Result of Hostilities, Terrorist Acts and Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine, and Certain Other Laws of Ukraine Regarding the Improvement of the Mechanism for the Provision of Compensation and the Accounting of Real Estate”;

to expedite the consideration and adoption in the second reading of the draft Law of Ukraine “On Amendments to the Law of Ukraine “On Ensuring the Rights and Freedoms of Internally Displaced Persons and other laws of Ukraine” (reg. No. 12301);

to expedite the consideration and adoption in the second reading of the draft Law on amendments to the Law of Ukraine “On State Registration of Real Rights to Immovable Property and Encumbrances Thereon” regarding the provision of a mechanism for state registration of ownership rights to immovable property in the absence of access to the records of technical inventory bureaux (reg. No. 11440).

To the Cabinet of Ministers of Ukraine:

to draft and submit to the Verkhovna Rada of Ukraine a draft law on support for persons whose personal non-property rights have been infringed as a result of the armed aggression of the Russian Federation against Ukraine;

to draft and submit to the Verkhovna Rada of Ukraine a draft law amending the Law of Ukraine “On the Provision of Public (Electronic Public) Services for the Declaration and Registration of Residence in Ukraine”, which would provide for the introduction of a temporary procedure for confirming the registration or declaration of residence of Ukrainian citizens registered in temporarily occupied territories where registers of territorial communities have not been established or are not functioning;

to designate the ministry responsible for formulating and implementing state policy regarding interaction with the Register of Damages Caused by the Aggression of the Russian Federation against Ukraine, and for coordinating the work of central and local executive authorities on this matter;

to approve an action plan for organising cooperation between central and local executive authorities, as well as local self-government bodies, with the Register of Damages Caused by the Aggression of the Russian Federation against Ukraine, and for informing citizens about the possibility of submitting applications to the Register, which shall provide for the identification of responsible officials, specific measures and deadlines for their implementation.

To the Ministry of Social Policy, Family and Unity of Ukraine:

to develop and submit for consideration by the Cabinet of Ministers of Ukraine a draft order on the approval of the State Policy Strategy on Internal Displacement for 2026 and the subsequent period;

ensure the introduction and operation of a system for recording information on harm caused to personal non-property rights;

to develop and submit for consideration by the Cabinet of Ministers of Ukraine a draft resolution on amending Cabinet of Ministers Resolution No. 306 of 25 April 2018 “Certain Issues Concerning the Establishment of a Link Between Disability and Wounds or Other Health Impairments”, with a view to transferring powers regarding the establishment of a link between disability and injuries or other health impairments from the Minvet to the MSPFU, as well as simplifying the procedure for establishing such a link;

to ensure the systematic updating of information (at least once every two months) on the list of medical and transport facilities, reflecting their status, occupancy and distribution of beds, for subsequent use in planning evacuations and attracting donor assistance;

develop and submit to the Cabinet of Ministers of Ukraine a draft resolution amending Resolution No. 616 of the Cabinet of Ministers of Ukraine dated 27 May 2025 “Certain Issues Concerning the Provision of State Support for the Accommodation of Internally Displaced Persons” with a view to reimbursing the cost of housing and communal services consumed by determining the average actual cost of housing and communal services consumed in temporary accommodation facilities per person, revising social standards for the consumption of housing and communal services, etc.;

to develop and submit for consideration by the Cabinet of Ministers of Ukraine a draft resolution providing for the possibility for students who are IDPs to simultaneously exercise their right to preferential (free) accommodation in student halls of residence and receive living allowances, as part of a comprehensive, targeted and non-discriminatory system of state support for young people affected by the R’s armed aggression against Ukraine, as well as to ensure inter-ministerial coordination of approaches in the field of social and educational policy;

to develop and submit to the KМУ for consideration a draft resolution on amending the Resolution of the Cabinet of Ministers of Ukraine of 14 May 2024 No. 551, providing for the simplification of the mechanism for receiving resettlement assistance, as well as the removal of the requirement for the mandatory existence of an individual plan of measures for return and reintegration for persons aged 18 to 23 as a condition for the granting of one-off resettlement assistance;

to ensure the implementation of an information campaign regarding the mechanism for obtaining one-off resettlement assistance by persons aged 18 to 23 who plan to return from the TOT or after deportation, by preparing and disseminating explanations and step-by-step application procedures.

To the Ministry of Justice of Ukraine:

to develop and submit for consideration by the Cabinet of Ministers of Ukraine an updated National Human Rights Strategy, taking into account the consequences of the RF’s full-scale armed aggression against Ukraine;

to develop and submit for consideration by the Cabinet of Ministers of Ukraine a regulatory act revising the approach to the complete non-recognition of documents issued in the TOT, with a view to introducing legal mechanisms for the limited and controlled use of information from certain types of such documents (in particular regarding births, deaths, marriages, education, employment and property ownership) with the application of clearly defined safeguards and verification procedures.

To the Ministry for Development of Communities and Territories of Ukraine:

to draft and submit to the Cabinet of Ministers of Ukraine a draft resolution on the introduction of a mechanism for recording immovable property over which control or access has been lost in the TOT, providing for the possibility of submitting information on such property and the damage or destruction caused to it via the Diia Portal;

to develop and submit for consideration by the Cabinet of Ministers of Ukraine a draft resolution on ensuring the possibility of submitting, via the Diia Portal, reports on movable property and non-residential real estate damaged or destroyed as a result of armed aggression;

to draft and submit for consideration by the Cabinet of Ministers of Ukraine a resolution amending Resolution No. 815 of the Cabinet of Ministers of Ukraine dated 7 July 2025, providing for:

1) a review of the criteria for recognising a property as destroyed based on the results of a remote survey;

2) a mechanism for making decisions regarding multi-apartment buildings as a single property on the basis of the first application submitted;

3) an exhaustive list of grounds for refusing to conduct a remote survey and ensure the mandatory provision of reasoned written decisions;

4) a procedure for appealing against decisions, actions or inaction of the commissions;

5) defining the criteria for the economic impracticability of restoring a property in order to decide whether to classify it as destroyed;

to draft and submit for consideration by the Cabinet of Ministers of Ukraine a normative legal act that will address legislative gaps regarding compensation for damaged common property in multi-apartment buildings, housing belonging to members of housing and construction cooperatives without formalised ownership rights, as well as regarding unfinished construction projects, and compensation for repairs carried out at the owner's own expense, despite the existence of legal grounds;

ensure the practical implementation of the compensation mechanism for repairs to damaged housing carried out independently and review the maximum limits of such compensation, taking into account the actual costs incurred by the affected persons;

to develop and submit to the Cabinet of Ministers of Ukraine a draft regulatory act on the introduction of systematic mechanisms for compensating or providing housing to persons whose homes have been damaged or destroyed as a result of armed aggression or whose right of use is restricted, with the aim of creating conditions for such persons to settle in the territory of Ukraine under Government control and preventing their forced return to the temporarily occupied territories.

To the Ministry of Digital Transformation of Ukraine:

to ensure the technical capability to submit, via the Diia Portal, information regarding immovable property damaged or destroyed as a result of the armed aggression against Ukraine since 19 February 2014;

introduce a mechanism for submitting applications to the Register of Damages Caused by the Aggression of the Russian Federation against Ukraine via administrative service centres, in particular for persons who do not have access to the Diia Portal or electronic means of identification;

ensure that the functionality of the Diia Portal, in particular the Diia mobile app, is expanded to allow users to select reasons for deregistration via the Diia Portal's mobile app.

To the Ministry of Internal Affairs of Ukraine:

to amend Order No. 579 of the Ministry of Internal Affairs of Ukraine dated 9 July 2018, with the aim of:

- bring its provisions into line with Resolution of the Cabinet of Ministers of Ukraine No. 138 of 10 March 2017, clearly establishing the responsibility of balance sheet holders for the maintenance and ensuring the proper technical condition of civil protection facilities;

- expanding the list of mandatory requirements for the equipping of civil protection facilities, in particular regarding the provision of drinking water supplies, sanitary facilities, first-aid kits, as well as barrier-free access for people with reduced mobility;

To the Ministry of Education and Science of Ukraine:

to develop and submit to the Cabinet of Ministers of Ukraine a draft order on the approval of the Concept for Access to Education for Children and Young People from the TOT.

2. COMPLIANCE WITH IHL DURING THE RUSSIAN-UKRAINIAN WAR. TREATMENT OF PRISONERS OF WAR, UNLAWFULLY DETAINED CIVILIANS AND DEPORTEES

Throughout 2025, the aggressor state continued to commit large-scale war crimes, as documented by reputable international organisations and Ukrainian law enforcement agencies.

The Secretariat of the Commissioner deals on a daily basis with the consequences of the Russian Federation's deliberate failure to comply with the norms of international humanitarian law and international human rights law.

Ukraine's experience highlights certain gaps in international humanitarian law, stemming from the specific nature of the Russian-Ukrainian war. The following issues require urgent attention: the protection of war victims, the civilian population of occupied territories, and civilians unlawfully deprived of their liberty during the armed conflict; the means and methods of waging modern warfare, including the use of technology (such as drones); and mechanisms to ensure compliance with the rules, including accountability for violations.

During the practical exercise of the powers of the Ukrainian Parliament Commissioner for Human Rights in the context of facilitating the release of prisoners of war and the return of deported Ukrainians, the imperfections and gaps in IHL have once again confirmed the weakness of the international legal mechanism for upholding human rights.

Without an effective system for implementing legal safeguards, the potential of international instruments to prevent disproportionate harm and ensure the protection of war victims in modern armed conflicts proves ineffective, yet often becomes a tool for manipulation by the aggressor. The disregard of security safeguards by members of the UN Security Council reduces them to the level of mere declarations.

The lack of binding resolutions by international organisations regarding the Russian Federation's responsibility for violations of international humanitarian law, Russia's disregard for IHL norms, and its failure to comply with any provisions of the Geneva Conventions have been on the agenda of the civilised world for the fourth year of this aggressive war. Examples of the Russian Federation's ongoing gross violations of IHL include the treatment of Ukrainian prisoners of war, unlawfully detained civilians and deported persons.

One of the many consequences of Russian lawlessness has been the deprivation of liberty and disappearance of **15,443** Ukrainian civilians.

Due to the absence in the Geneva Convention relative to the Protection of Civilian Persons in Time of War of 12 August 1949 (hereinafter – GC IV) of a legal mechanism for recognising the status, release and repatriation of civilians unlawfully detained by the aggressor, it is impossible to adequately ensure the protection of this category of persons.

To address this regulatory gap, the Commissioner proposes initiating the creation of a special protocol to GC IV on persons unlawfully deprived of their liberty, which, in particular, standardise the definition of “civilian arbitrarily deprived of personal liberty”, provide for procedures to verify the legal status of such persons held by a party to the armed conflict, as well as procedures for monitoring their conditions of detention, release and repatriation.

In this context, the Commissioner's work consistently emphasises the need to adopt modern approaches to the interpretation and application of the provisions of the Geneva Conventions in national practice, a point he has repeatedly highlighted during meetings with representatives of the ICRC.

It is significant that in 2025, the ICRC published an updated commentary on GC IV concerning the protection of civilians and children during war. This is the first comprehensive update to the commentary on this Convention in many decades, summarising over 75 years of state practice, judicial practice and the development of international humanitarian law.

The updated commentary is an authoritative tool for interpreting the norms of international humanitarian law and an important practical guide for state authorities, military lawyers and human rights institutions regarding the application of the provisions of the Geneva Conventions in contemporary armed conflicts.

Another systematic violation by the Russian Federation of the rights of persons protected under IHL is the denial of Ukrainian prisoners of war's right to a fair and proper judicial investigation.

In contravention of the immunity of combatants, enshrined in Article 43 of the Additional Protocol to the Geneva Conventions of 12 August 1949, relating to the protection of victims of international armed conflicts of 8 June 1977 (hereinafter – Protocol I) to the Geneva Conventions, the judicial authorities of the Russian Federation, acting on the political will of the leadership of the aggressor state, are convicting defenders of Ukraine under criminal articles as members of a terrorist organisation.

A direct prohibition on convicting military personnel for their participation in hostilities would contribute to the protection of combatants who have fallen into enemy hands.

These are just a few examples of the Russian Federation's deliberate disregard for the norms of international humanitarian law.

Against this backdrop, the issue of the proper implementation of the mandate by the International Committee of the Red Cross requires separate attention.

Ukraine has repeatedly highlighted the ICRC's insufficient involvement in protecting the rights of Ukrainian citizens, particularly regarding access to places of detention in the Russian Federation and in the TOT of Ukraine where our compatriots are held, as well as the establishment and operation of humanitarian corridors for their return.

During meetings with the families of Ukrainian prisoners of war, ICRC representatives, whilst emphasising the organisation's neutrality, state that "both sides" should grant access to ICRC representatives, ignoring the fact that it is the Russian side that engages in the practice of obstructing visits by its staff to places of detention where Ukrainian citizens are held.

Amending the norms of international humanitarian law, particularly to allow the ICRC to deviate from the principle of neutrality where large-scale and systematic violations of international humanitarian law are identified and documented during an armed conflict, would significantly strengthen respect for human dignity within the global legal order.

Launched in 2025 by the International Committee of the Red Cross with the support of a number of states, the Global Initiative to Galvanize Political Commitment to

International Humanitarian Law (IHL) aims to minimise, through the political will of states, the impact of growing disregard for IHL norms on the protection of persons in armed conflict. The Initiative should provide the necessary impetus for the modernisation of IHL, particularly regarding accountability for violations of its norms.

On the Commissioner's initiative, the Inter-Agency Commission on the Application and Implementation of International Humanitarian Law in Ukraine resumed its activities in October 2025. The Commissioner's Secretariat proposed stepping up the activities of this coordination mechanism with a view to strengthening inter-agency cooperation in the field of compliance with and implementation of the norms of international humanitarian law in the context of armed aggression against Ukraine.

As a result of this work, the Commission, established in accordance with Resolution No. 329 of the Cabinet of Ministers of Ukraine dated 26 April 2017, was reactivated. The Commission functions as an advisory body to the Government and is tasked with coordinating the activities of state authorities regarding the fulfilment of Ukraine's international legal obligations in the field of international humanitarian law, in particular those arising from the Geneva Conventions and other international treaties.

The relaunch of the Commission's work marked an important step towards systematising inter-agency cooperation, developing coordinated approaches to the application of international humanitarian law, and strengthening state policy on documenting and responding to violations of international humanitarian law.

Within the framework of the Commission's activities, a number of thematic working groups have been established to examine specific aspects of the application of international humanitarian law and to develop practical recommendations for state authorities. The working group on the protection of children's rights in situations of armed conflict is headed by a Representative (Deputy) of the Commissioner for the Rights of the Child. This approach facilitates the integration of a human rights dimension into the Commission's activities and strengthens inter-institutional cooperation in the field of child rights protection, particularly regarding the prevention of violations of children's rights in the context of armed conflict, the documentation of such violations, and the development of mechanisms for an effective response.

Ukraine has the moral and political right to initiate amendments to the IHL and to promote the ideas behind such changes, and, given that our citizens continue to suffer daily in Russian captivity and in the temporarily occupied territories, action must be swift and purposeful.

2.1 Treatment of Ukrainian Prisoners of War

Throughout 2025, the Commissioner received **3,925** appeals raising issues concerning the protection of the rights of Ukrainian servicemen whilst in Russian captivity, and of their family members.

Family members of captive servicemen lodged appeals regarding the conditions of detention of their relatives and their mistreatment, requesting assistance in ensuring that the aggressor state complies with the norms of international humanitarian law concerning

detainees, including the provision of medical care to wounded and sick prisoners of war, etc.

The Commissioner's activities in the field of protecting the rights of prisoners of war focus on ongoing cooperation with international organisations, primarily the ICRC, UN bodies, and ombudsman institutions of other states, as well as advocacy for the Russian Federation's compliance with the norms of international humanitarian law. Using international platforms to exert political and legal pressure on the aggressor state, the Commissioner systematically informs international partners about instances of torture, unlawful criminal prosecution and the blocking of humanitarian access to places where Ukrainian citizens deprived of their liberty are being held.

A separate area of focus is humanitarian communication, aimed at facilitating the repatriation of prisoners of war, the return of the seriously ill and wounded, and access to information regarding the fate of detainees.

In particular, agreements are in place with the Russian Ombudsman regarding bilateral visits to prisoners at their places of detention. The Commissioner systematically insists on the need for representatives of the Russian side to visit penal institutions within the territory of the Russian Federation and the TOT of Ukraine in the event that facts of improper treatment of Ukrainian prisoners are established, and also provides information on systematic violations of the rights of Ukrainian prisoners of war and civilian detainees. Some of this information is obtained by the Commissioner's Secretariat during operations to repatriate our defenders, where released individuals are interviewed about their treatment whilst in captivity.

Over the course of the year, the Commissioner sent 30 letters to the High Commissioner for Human Rights in the Russian Federation regarding visits to verify that the conditions of detention of prisoners of war comply with the requirements of international humanitarian law, and that adequate medical care is provided in institutions in the Altai, Perm and Krasnoyarsk Krai, and the Voronezh, Volgograd, Orenburg, Rostov and Smolensk regions, as well as the Republic of Mordovia of the Russian Federation, etc.

The Russian side has monitored 14 places of detention for Ukrainian servicemen (penal colonies and RC) with the aim of improving their conditions of detention, ensuring the prohibition of torture, and providing adequate medical care and appropriate nutrition. This information is corroborated by the results of a survey of servicemen released from captivity.

As part of humanitarian projects, the Commissioner, with the participation of the ICRC, ensures that prisoners of war on both sides have the right to communicate with the outside world, and assists prisoners of war in receiving letters and parcels. In 2025, through the communication channel with the Russian Ombudsman, the Commissioner forwarded 5,000 letters and 5,000 parcels to Ukrainian servicemen held in Russian captivity.

a) Violations of prisoners of war's right to life

Throughout 2025, reports emerged of further instances of the arbitrary execution of Ukrainian military personnel taken prisoner on the battlefield or while in captivity.

According to available information (response from the OGP to the Commissioner's request No. 18/4/3-121979VYH-25 dated 24 December 2025), as of 10 December 2025, Ukrainian law enforcement agencies were conducting pre-trial investigations into **105** criminal proceedings concerning the killing by Russian servicemen of **337** Ukrainian prisoners of war, including at least 50 people who died as a result of a terrorist attack at the penal colony in the village of Olenivka in the TOT of Donetsk region.

On the morning of 22 May 2025, the occupying forces launched an assault on the positions of the Defence Forces near the village of Udachne in the Pokrovsk district, where four Ukrainian servicemen were carrying out combat duties. During the attack, representatives of the aggressor state took two defenders prisoner, after which they shot them while they were unarmed in a wooded area. The fate of the other defenders is currently unknown.

Under the procedural guidance of the Donetsk Regional Prosecutor's Office, a pre-trial investigation has been launched in criminal proceedings regarding the commission of a war crime (Part 2 of Article 438 of the CC of Ukraine). (Publication by the Office of the Prosecutor General on its Telegram channel dated 23 May 2025).

In August 2025, near the village of Myrolyubivka in the Pokrovsk district of the Donetsk region, the occupying forces captured a Ukrainian serviceman, S. He was taken to the basement of a seized building, where seven other defenders of Ukraine were being held. During interrogations, Russian soldiers tortured the prisoners – inflicting severe bodily harm and cutting off parts of their bodies. Soldier S. had his throat slit. Afterwards, the prisoners' bodies were thrown into a pit and covered with rubbish, as they were believed to be dead. However, S. survived and, despite his injuries, managed to reach Ukrainian positions within five days.

A pre-trial investigation has been launched into the commission of a war crime under Part 2 of Article 438 of the CC of Ukraine (War Crimes). (Website of the Office of the Prosecutor General, publication dated 29 August 2025).

On 27 December 2025, during an assault on positions in the village of Shakhove, Pokrovsk district, Donetsk region, representatives of the aggressor state took two Ukrainian AFU servicemen captive; they had been carrying out a combat mission at one of the positions.

The occupiers, threatening them with firearms, forced the prisoners to undress, after which they shot both unarmed defenders.

Under the procedural guidance of the Donetsk Regional Prosecutor's Office, a pre-trial investigation has been launched in criminal proceedings concerning the commission of a war crime (Part 2 of Article 438 of the CC of Ukraine). (Website of the Office of the Prosecutor General, publication dated 29 December 2025).

During the OSCE's implementation of the "Moscow Mechanism" to document Russia's crimes against Ukrainian prisoners of war, the Mission "documented a large

number of arbitrary killings and executions for which the Russian Federation is accused”. In the OSCE ODIHR Report “Report on Possible Violations and Abuses of International Humanitarian and Human Rights Law, War Crimes and Crimes Against Humanity, Related to the Treatment of Ukrainian POWs by the Russian Federation”, the organisation’s experts note that public statements by Russian officials that “there will be no mercy” further encourage perpetrators to carry out extrajudicial executions and contribute to impunity.

Known executions and killings of Ukrainian prisoners of war by representatives of the Russian Federation’s military formations constitute gross violations of international humanitarian law (Article 3 of Geneva Convention III, Article 4(2)(a) of Protocol I), defined as grave breaches of the Geneva Conventions (Article 130 of Geneva Convention III) and as war crimes (Article 8(2)(a) of the Rome Statute of the International Criminal Court).

For every established case of the killing of Ukrainian servicemen held in captivity, the Commissioner informs the ICRC and UN bodies (in particular the Office of the UN High Commissioner for Human Rights). Furthermore, materials regarding executions are officially forwarded to the Human Rights Commissioner in the Russian Federation.

b) Violations of the rights of combatants

According to information received by the Commissioner, the competent authorities of the Russian Federation are systematically violating the norms of international humanitarian law by denying combatant and/or prisoner-of-war status; prosecution for the mere fact of participating in hostilities; and the application of the aggressor state’s domestic criminal legislation in place of the norms of international humanitarian law.

This position is reinforced by statements from the senior military and political leadership of the Russian Federation regarding the terrorist nature of the actions of Ukrainian military units, which dehumanises servicemen of the Armed Forces of Ukraine and encourages and justifies the use of violence against Ukrainian prisoners of war.

Such actions contravene the provisions set out in Articles 4, 13, 82-84 and 99 of the Geneva Convention relative to the Treatment of Prisoners of War of 12 August 1949 (hereinafter – GC III) and Articles 43-44 of Protocol I, which clearly define the status of a combatant and the right of persons forming part of the armed forces of a party to an armed conflict to take direct part in hostilities.

The criminalisation of the lawful participation of military personnel in combat operations undermines the fundamental principles of the regime for the protection of prisoners of war and constitutes a serious violation of international humanitarian law.

As of December 2025, there are **2,112** known prisoners of war and civilians (letter from the KoordShtab dated 19 December 2025 No. 222/KSh/34160) who are subject to criminal prosecution, of whom **1,467** have been sentenced.

The Russian Federation has handed down a ‘sentence’ of 22 years’ imprisonment, to be served in a strict-regime penal colony, to Serhii M., a serviceman of the 36th Separate Marine Brigade of the AFU. The occupation authorities’ investigation and court ‘established’ that: “In February-April 2022, whilst stationed

at combat positions in the Donetsk People's Republic, acting in accordance with a criminal plan devised by Ukraine's senior political and military leadership, M. repeatedly gave orders to military personnel under his command to carry out targeted shelling of residential buildings in nearby settlements. The defendant organised and commanded mortar fire teams. As a result of repeated shelling, a civilian was wounded. Residential buildings and farm buildings were also damaged." During the preliminary investigation, M. partially admitted guilt in the acts he is charged with. However, his position was not taken into account.

In October 2025, a 'sentence' was handed down in the RF to three Ukrainian servicemen of the 36th Separate Marine Brigade of the AFU, Maksym N. and Maksym Ch., in the form of 21 years' imprisonment, and Vladyslav V. – to 23 years' imprisonment, to be served in a strict-regime penal colony.

The occupation investigation and court "established": "In March 2022, the aforementioned AFU servicemen, stationed at combat positions on the territory of the Azovstal Iron and Steel Works in Mariupol, acting in accordance with a criminal plan devised by Ukraine's senior political and military leadership, repeatedly carried out targeted shelling of residential buildings and infrastructure in the city and the settlement of Stryi Krym. The suspects organised and commanded combat crews operating BM-21 "Hrad" multiple launch rocket systems. As a result of repeated shelling, residential and farm buildings were damaged. No civilians were injured, as they were able to take shelter in a safe place."

According to the report by experts of the OSCE's "Moscow Mechanism" dated 22 September 2025, the military and political leadership of the Russian Federation has created conditions for the systematic criminal prosecution of prisoners of war solely on the grounds of their participation in hostilities.

The Commissioner has repeatedly written to the Russian Ombudsman calling for assistance in ending the practice of charging combatants with criminal offences for their lawful participation in military operations. To date, no response to these letters has been received.

The issue of the unlawful criminal prosecution of prisoners and ensuring that the Russian side complies with the rules governing the treatment of prisoners of war is regularly raised during the Commissioner's meetings with international organisations and, above all, with the leadership of the ICRC. In one of his most recent letters, sent to ICRC President Mirjana Spoljaric Egger, the Commissioner called for the activation of the mechanisms for the protection of prisoners of war provided for under the ICRC's mandate and for assistance in ending the practice of criminal prosecution of combatants for their participation in hostilities.

c) Violations of the right to humane treatment of prisoners of war

Unlike Ukraine, the RF has not established special camps for the detention of prisoners of war, and captured combatants are held in facilities within the RF's prison

system, in the same way as ordinary prisoners. There are currently over 180 known places of detention in the temporarily occupied territory of Ukraine and on Russian territory. The Russian Federation's deliberate disregard for virtually all norms of international humanitarian law once again confirms the urgent need for the democratic world to review international law in the interests of human security.

Servicemen released from captivity report systematic torture being used in places of detention to force prisoners to incriminate themselves and admit guilt for crimes they did not commit. They also report round-the-clock physical violence and psychological abuse, harassment by service dogs, a lack of proper medical care, and in some cases, a deliberate refusal to provide medical assistance to prisoners of war.

The Commissioner has received appeals from family members of Ukrainian defenders who are prisoners of war or have been released from captivity, indicating a trend towards an increase in the frequency and severity of violence inflicted on Ukrainian servicemen held captive in certain institutions of the RF prison system.

High levels of physical and psychological violence have been recorded in facilities in the town of Biysk, Altai Krai; the town of Borisoglibsk, Voronezh region; Vyazma, Smolensk region; Kamyshin, Volgograd region; the cities of Perm and Kizel, Perm Krai; the village of Sosnovka, Zubovo-Polyansky district, Republic of Mordovia; and Taganrog, Rostov region, of the Russian Federation.

Former prisoners recount torture during interrogations (including the cutting off of body parts and the removal of skin bearing tattoos), systematic beatings, sexual violence, attacks by dogs, the use of electric shockers on prisoners, being forced to remain (for up to 16 hours) in unnatural positions, and other abuses.

At the same time, the conditions of detention for those deprived of their liberty do not even meet the standards required by Russian legislation. This concerns the inadequacy of cell capacity relative to the number of detainees, breaches of temperature regulations, and food that does not meet human biological needs, among other issues.

Unsatisfactory conditions of detention lead to the spread of infectious diseases among prisoners, the exacerbation of chronic illnesses, complications following injuries, tooth loss, weight loss (in many cases, a loss of up to 30-40 kg is recorded), and so on.

According to data released by the UN Human Rights Monitoring Mission in Ukraine in February 2025, almost all (95%) of the 454 released Ukrainian prisoners of war who were interviewed reported having been subjected to torture or ill-treatment whilst in Russian captivity. Torture was widespread during interrogations and at all stages of captivity. More than half of those surveyed had suffered sexual violence.

Appalling conditions of detention and inhumane treatment lead to the onset or exacerbation of chronic illnesses and mental disorders, which, taken together, can lead to death even after release from captivity.

Soldier Sh. was taken prisoner in March 2022 and was returned in April 2023. In June 2025, he died of cardiac arrest, which is believed to be linked to the effects of his captivity and torture.

S., a serviceman of the Ukrainian Navy, was taken prisoner in May 2022 in Mariupol, after leaving the Azovstal Iron and Steel Works. He was held in the temporarily occupied territory of Donetsk region and in places of detention within the RF. He was released from captivity in March 2025 and died in November 2025.

Serviceman D. was taken prisoner in July 2023. After being held captive in places of detention in the temporarily occupied territory of Donetsk region, he was released from captivity following the “1000 for 1000” prisoner exchange agreement; however, as a result of torture and inhuman treatment whilst in captivity, he died in June 2025.

Serviceman Z. was taken prisoner in April 2022 whilst carrying out a combat mission in the Donetsk region. He was held in detention facilities in the temporarily occupied territory of the Donetsk region and on the territory of the RF. A month after his return from captivity, in June 2025, he died as a result of torture.

In August 2025, the bodies of five Ukrainian servicemen who had died in captivity were returned to Ukraine among those repatriated. They had been prioritised for return as seriously wounded and seriously ill prisoners, in accordance with the agreements reached during the second round of negotiations in Istanbul. However, due to the Russian side’s delaying tactics, they did not survive to see their release.

Violations of the conditions governing the treatment and detention of prisoners of war are taking place against a backdrop of the Russian side’s disregard for the mandate of the International Committee of the Red Cross as a humanitarian organisation, as agreed by the parties to the conflict.

The Russian side selectively informs Ukraine, via the Central Tracing Agency (CTA) Bureau of the International Committee of the Red Cross, of the capture of Ukrainian servicemen; it periodically (censored) facilitates correspondence between prisoners of war and their families and the receipt of humanitarian consignments.

The Russian Federation strictly regulates or restricts access for ICRC representatives to direct communication with prisoners of war, as well as the provision of information to Ukraine regarding the health of prisoners of war and instances of their criminal prosecution. The right of prisoners of war to communicate with the outside world is systematically violated. These actions and the inaction of the administrations of places of detention are widespread throughout the territory of the RF and constitute a deliberate violation of Articles 3, 9, 72, 73, 123, 125 and 126 of Protocol III.

2.2. Violations of the Rights of the Civilian Population in the TOT of Ukraine

The occupation of Ukrainian territory has been accompanied by numerous violations of fundamental human rights and the norms of international humanitarian law affecting the civilian population, committed by the political and military leadership of the RF, the occupation administrations, and representatives of the bodies and formations under their control.

Arbitrary detentions, enforced disappearances of civilians and other serious violations of the aggressor state's international obligations, which have persisted since the illegal annexation of the AR of Crimea in 2014, and subsequently extended to the territory of Luhansk, Donetsk and other temporarily occupied regions of Ukraine, constitute a deliberate and consistent policy of the RF in the occupied territory.

Throughout 2025, the practice of depriving Ukrainian civilians of their liberty and detaining them in the occupied territories without formally bringing any charges, without providing the opportunity to challenge the legality of the detention, without contact with the outside world and without guarantees of a fair trial or review of the case in court, etc., remained unchanged. Such detentions, followed by administrative or criminal prosecution, are predominantly carried out on suspicion of loyalty to Ukraine or cooperation with the Ukrainian Defence Forces, and are intended to intimidate and extend control over the population of the temporarily occupied territory.

Most often, administrative proceedings are brought on charges of actions aimed at “discrediting the Russian army”, following public posts or comments on social media and messaging apps. The discovery of an image of the Ukrainian national emblem or flag on a mobile phone during a search can serve as grounds for arrest.

During the period of the full-scale invasion, at least 1,510 administrative proceedings initiated by the occupation courts of Crimea under Article 20.3.3 of the Code of Administrative Offences of the Russian Federation have been documented (Review of the situation regarding respect for human rights and international humanitarian law in occupied Crimea for 2025, CHRG, January 2026). Including in 2025 – at least 517 administrative proceedings, with decisions on fines or administrative arrest having been issued in 464 of them.

Arbitrary detentions are accompanied by violations of the conditions of detention and the treatment of detainees, as well as violations of the rights of vulnerable groups, such as persons with disabilities or health impairments, and persons entitled to protection under international law.

Throughout 2025, the Commissioner sent 57 letters to the Russian Ombudsman regarding violations of the right of civilians protected under IHL to medical care and treatment (Article 38 of GC IV), demanding visits to prisoners and the provision of adequate conditions of detention and treatment.

In October 2025, the Krasnoyarsk Krai Court overturned a lower court's decision to release Oleksandr S. from serving his sentence in a penal colony on health grounds – he had completely lost his sight – and ordered that the person, who has a Group 1 disability, be returned to prison. On 1 December, the prisoner was transferred from occupied Crimea to a prison in Minusynsk, Krasnoyarsk Krai.

Lenur Kh., aged 57, sentenced to 18 years' imprisonment, was released from serving his sentence in August 2025 due to a cancerous condition (liver cancer). However, in November 2025, he was remanded in custody again following a decision by the Arkhangelsk Regional Court of the RF.

Both decisions were taken by the courts despite the fact that the prisoners' illnesses are classified as serious conditions that preclude the detention of suspects or those accused of committing crimes. Given the lack of adequate conditions for the care and treatment of patients in detention facilities, such decisions put their lives at risk.

The rules of international humanitarian law (Common Article 3 of the Geneva Conventions relative to the protection of victims of war, Article 75 of the Additional Protocol to the Geneva Conventions of 12 August 1949, relating to the protection of victims of international armed conflicts (Protocol I), of 8 June 1977) oblige the parties to an armed conflict to treat humanely persons in the power of a party to the conflict and prohibit, in particular, violence against life and person, including murder, cruel treatment and torture, the taking of hostages, outrages upon human dignity, sentencing and the imposition of punishment without due process, and more.

However, during 2025, the Commissioner received 882 appeals concerning violations of the rights of the civilian population under occupation.

As of December 2025, there is information that the Russian Federation has deprived 1,782 Ukrainian civilians of their liberty, with the detention of 867 of them in the RF and TOT confirmed by the ICRC. At the same time, the actual number of captives may be significantly higher, as the fate of thousands of civilians who went missing during the occupation of Ukrainian territory remains unknown.

Most frequently, the appeals raised issues regarding the observance of the rights of civilians who were arbitrarily detained and unlawfully deprived of their personal liberty in the occupied territory or in the RF, in connection with their professional activities, involvement in the resistance and the Ukrainian Defence Forces, active civic engagement, loyalty to Ukraine, or refusal to cooperate with the occupying authorities. Arbitrary detentions of Crimean Tatars on ethnic grounds have not ceased.

In August 2025, a Ukrainian citizen – a Crimean Tatar named S., who was in the TOT of the AR of Crimea – was detained by representatives of the aggressor state whilst attempting to leave the occupied territory.

Following his detention, citizen S. was charged with “treason” on the grounds of making a money transfer to a Ukrainian bank card. The accused faces a prison sentence of up to 20 years.

Information regarding Citizen S.’s state of health is coming exclusively from unofficial sources. There is no information regarding the conditions of his detention or the provision of medical care.

No information regarding the detainees is being provided to the Ukrainian authorities, their families or human rights activists.

A member of the AFU appealed to the Commissioner, reporting that his mother, who had been living in the temporarily occupied territory of Zaporizhzhia region, had been detained in June 2025 by representatives of the Russian Federation. The applicant believes her arrest is linked to the fact that he is serving in the AFU.

To date, the whereabouts of the applicant’s mother remain unknown, and there has been no contact with her.

Limited access to places of detention in the RF, or in most cases a complete lack thereof, poses a significant risk to the lives and health of Ukrainian citizens. The UN OHCHR notes (Report on “The Treatment of Civilians Deprived of Their Liberty in the Context of the Armed Attack by the Russian Federation against Ukraine”, 1 September 2023 – 10 September 2025, UN OHCHR, 23 September 2025) that a number of detainees are held in facilities on Russian territory or within a vast network of makeshift cells in the occupied territory, to which international monitors did not have guaranteed access at the time of the investigation. The map of such locations includes dozens of sites. This directly hinders independent verification of reports of torture, sexual violence and deaths in custody.

Over the course of the year, reports of ill-treatment of persons deprived of their liberty as a result of the armed aggression against Ukraine were received concerning 18 facilities in the temporarily occupied territory and 41 facilities on the territory of the RF (SBU Letter No. 34.4-25329 dated 23 December 2025).

Ukrainian law enforcement agencies have documented evidence of systematic violations of the fundamental rights of persons deprived of their liberty, including the use of torture: beatings, electric shocks, sexual violence, threats of rape, mock executions or prolonged detention in conditions of complete isolation. They have also documented inadequate conditions of detention: insufficient and poor-quality rations, perfunctory medical care and unsatisfactory sanitary and hygienic conditions. Furthermore, detainees are denied access to adequate legal assistance and contact with their families.

The Commissioner's Secretariat received an appeal from Ukrainian citizen H. requesting assistance in securing the release of his daughter, who had been detained by representatives of the aggressor state and was being held in the temporarily occupied territory.

Attached to the appeal was a letter from his daughter from prison, in which she reported on the significant number of Ukrainian women of various ages, deprived of their liberty for resisting the occupiers and for their pro-Ukrainian stance, whom she had met whilst in remand centres, prisons, penal colonies and unsuitable detention facilities.

The letter also highlighted the intolerable conditions faced by women deprived of their liberty: they are humiliated, subjected to torture (for example, by electric shock, water, and the use of hammers, pliers and medical instruments), sexual and other forms of violence, and deprived of sleep, food, water and so on.

These facts have also been documented by international organisations. Reports by UN and OSCE monitoring missions state that practices of ill-treatment are widespread and systematic.

In particular, the Office of the UN High Commissioner for Human Rights has stated in its reports that the Russian authorities subject Ukrainian civilian detainees to systematic torture and inhuman treatment, including sexual violence.

According to the OSCE ODIHR report, new evidence has confirmed previously documented crimes: Russian forces are deliberately detaining certain categories of civilians without legal grounds, depriving them of any procedural rights and contact with the outside world, and subsequently fabricate charges against them and hand down sentences based on fabricated evidence (Seventh Interim Report on reported violations of international humanitarian law and international human rights law in Ukraine, OSCE ODIHR, 15 July 2025).

Ukrainian citizens unlawfully convicted on political grounds within the territory of the RF and the temporarily occupied territory of Ukraine, and persons who found themselves under occupation whilst serving sentences in Ukrainian prisons, following the formal completion of their sentences, they are held in special facilities (so-called centres for the temporary detention of foreign nationals, IDC) “until their forced expulsion from the Russian Federation” (Article 27.19 of the Code of Administrative Offences of the Russian Federation). Ukrainian citizens detained for “violating the migration legislation of the Russian Federation” are also sent to these centres.

The duration of stay in an IDC must not exceed ninety days. However, in the absence of a practical possibility to carry out the administrative expulsion of a foreign national, the period of detention may be extended repeatedly for a further ninety days (Article 27.19.1 of the Code of Administrative Offences of the Russian Federation). In practice, decisions to extend detention are taken by judges automatically, without an individual assessment of the circumstances of the case.

A Ukrainian citizen A. – who had been imprisoned in the RF for political reasons – was held for approximately six months at the IDC in the Krasnodar Krai after serving a 10-year prison sentence, where he was subjected to pressure aimed at forcing him to acquire Russian citizenship.

Ukrainian citizen A., released in February 2025 after eight years of unlawful detention in the Russian Federation, was immediately transferred to the IDC in the Rostov region and subsequently taken to an unknown destination. New criminal proceedings have now been initiated against the citizen and his unlawful detention continues.

At the same time, the mechanism of transit deportation via a third country adopted by the Russian Federation poses risks to the lives and health of the deportees and creates the conditions for humanitarian tensions and the discrediting of Ukraine.

In June 2025, the RF significantly stepped up the deportation of Ukrainian citizens via the Verkhniy Lars (RF) – Dariali (Georgia) border crossing. The chosen route led to a tense humanitarian situation on the Georgian side of the border. A significant number of deportees, who lacked valid documents and were detained for identification purposes, were held for a prolonged period without their basic needs being adequately met.

The Commissioner coordinated a systematic response to violations of the rights of Ukrainian citizens in conjunction with the Ministry of Foreign Affairs of Ukraine, the Ministry of Internal Affairs of Ukraine, the State Migration Service of Ukraine and international humanitarian organisations.

As a result of this work, on 21 August 2025, 65 citizens were returned to Ukraine, including 10 women and 8 people with serious illnesses.

During his communications with the Russian Ombudsman, the Commissioner repeatedly insisted on arranging for the deported Ukrainian citizens to be transported via the territory of the Republic of Belarus directly to Ukraine, as this was the most predictable and safest route of return. Thanks to sustained pressure from the Commissioner on the Russian side throughout 2025, 80 Ukrainian citizens who had been held at the IDC were returned to Ukraine on two occasions.

In 2025, the forcible displacement and eviction of Ukrainian civilians from the temporarily occupied territory of Ukraine took on the characteristics of a large-scale policy, accompanied by forced passportisation and legalised mechanisms of displacement. According to the Prosecutor's Office of the Autonomous Republic of Crimea, on the occupied peninsula alone, the occupation courts issued over 13,500 eviction orders against civilians, predominantly due to the lack of a Russian passport or 'violations of migration rules'. In total, since 2014, around 200,000 people have been forced to leave Crimea on such grounds, indicating a deliberate change in the demographic composition.

Following the signing in March 2025 by the President of the Russian Federation of a decree obliging residents of the occupied parts of Zaporizhzhia, Kherson, Donetsk and Luhansk regions to obtain a Russian passport or leave these territories (Decree of the President of the Russian Federation No. 159 of 20 March 2025 “On the Specifics of the Legal Status of Certain Categories of Foreign Citizens and Stateless Persons in the Russian Federation, and on Amending and Repealing Certain Decrees of the President of the Russian Federation”), human rights defenders recorded an increase in mass detentions, administrative proceedings and the transfer of foreign citizens to “migration centres”. Those detained were forced either to accept Russian citizenship or to leave the occupied territory.

Similar coercive measures have been introduced since January 2026 in respect of children under the age of 14, who are obliged to obtain a Russian passport, primarily a foreign passport, without which it is impossible to cross the state border of the Russian Federation and leave the TOT of Ukraine.

This indicates a systematic policy of forced eviction and assimilation of the population, aimed at destroying the Ukrainian social and cultural space in the occupied territories, which violates the provisions of Articles 49 and 50 of GC IV.

2.3. Release of Persons Deprived of Their Liberty as a Result of Armed Aggression against Ukraine

As an official who is a member of the Council of the KoordShtab, the Commissioner ensures that the principles of transparency and fairness are upheld in the return of prisoners of war and civilians.

The Representative (Deputy) of the Commissioner for Human Rights in the System of Bodies in the Security and Defence Sector is a member of the Council and oversees the activities of the Working Group on Civilian Issues (hereinafter – the Working Group).

One of the outcomes of the Working Group’s activities is the Action Plan for the Protection of the Rights and Freedoms of Civilians Deprived of Their Personal Liberty as a Result of Armed Aggression against Ukraine for 2025-2027, which, in particular, sets out strategic approaches to the release of civilians. This document has now been submitted to the Cabinet of Ministers of Ukraine.

Throughout 2025, state bodies within the Coordination Headquarters for the Treatment of Prisoners of War developed the principles for the return of Ukrainians to their homeland, which are used during the negotiation process.

In 2025, 11 operations were carried out, during which **3,435** people were released and returned to Ukraine, including **3,180** military personnel and **255** civilians unlawfully held captive.

Factors complicating the conduct of operations to release and return to Ukraine citizens deprived of their personal liberty by the aggressor state include: the Russian Federation’s manipulation of exchange procedures, including by creating uncertainty regarding the number of detained civilians, holding them as combatants, unlawful criminal prosecution of civilians, and other factors (Letter from the Coordination

Headquarters on the Treatment of Prisoners of War, No. 222/KSH/34160 dated 19 December 2025).

With the aim of keeping the issue of the return of prisoners of war and civilians from Russian captivity on the international community's agenda, the Commissioner raised this issue throughout 2025 at meetings of the UN Human Rights Council, during special events at the UN General Assembly, and at sessions of the OSCE and the Council of Europe.

Thanks to this active international stance, cooperation has been established with international institutions and non-governmental human rights networks regarding the search for and release of individuals.

The Commissioner supported the joint project launched in January 2025 by international human rights groups, People First, aimed at drawing attention to the plight of civilian hostages and prisoners of war and demanding their priority release.

Throughout 2025, with the direct participation and support of the Commissioner, work continued within international platforms and coalitions to secure the release of civilians deprived of their personal liberty.

To implement the decisions developed by the International Platform for the Release of Civilians Unlawfully Detained by the Russian Federation, a Working Group on the Human Dimension was established, comprising authorised representatives of the participating states and co-chaired by the Ambassadors of Canada and Norway. The Working Group's activities have resulted, in particular, in the compilation of lists of unlawfully detained civilians, the drafting of proposals for negotiations, the identification of levers of influence on the Russian Federation, etc.

2.4. Relocation (Evacuation) of Civilians from the TOT and the Territory of the Russian Federation

As a result of the Russian Federation's armed aggression and the temporary occupation of part of Ukraine's territory, a significant number of families have been separated by the war, including cases where parents have been separated from their children or relatives have lost contact with one another.

The tightening of the Russian Federation's migration policy, a significant deterioration in security conditions and the intensification of repressive practices against the civilian population have led to a more than tenfold increase in the number of appeals from citizens to the Commissioner requesting assistance in returning to Ukraine (40 appeals were received in 2024; 421 in 2025).

In 2025, thanks to the systematic work of the Commissioner's Secretariat, the return (evacuation) to territory controlled by Ukraine of **363** civilians who were in the temporarily occupied territory under the de facto control of the Russian Federation was facilitated (58 in 2024).

The Commissioner's Secretariat received an appeal from a resident of Zaporizhzhia requesting assistance in relocating his parents from the TOT of Zaporizhzhia region to the territory controlled by the Government of Ukraine.

Following the occupation in March 2022, their home was searched on multiple occasions. Armed Russian soldiers demanded money, applied psychological pressure, and, in particular, fired shots in the vicinity of a three-year-old child. Gold jewellery, mobile phones and laptops were stolen.

The father was held in a cellar for three days on suspicion of links to the AFU, as his son is a serviceman. The man was tortured and subjected to a mock execution. The couple's Ukrainian passports were confiscated (copies remained) and they were forced to obtain Russian ones. The occupying authorities prevented them from leaving the TOT to third countries independently.

Through the joint efforts of the Commissioner's Secretariat and civil society organisations, a series of measures were successfully implemented to organise a safe departure, enabling the parents to be reunited with their son.

Coordinated efforts by the Commissioner's Secretariat, state authorities, international organisations and civil society organisations are a key factor in ensuring the safe departure of Ukrainian citizens from the temporarily occupied territory and their reunification with their families. Cooperation and mutual support between these structures minimise risks during evacuation, ensure comprehensive assistance immediately upon arrival, and facilitate the further reintegration of people following their displacement.

The Commissioner received an appeal from citizen M. requesting assistance in facilitating the departure from the TOT of her husband, daughter and six family members, including three children, one of whom was a newborn grandson. The family was living in extremely difficult and dangerous conditions. As a result of living under occupation, some family members had developed hearing and speech impairments. Due to the family's principled refusal to accept documents from the occupying authorities, its members were deprived of the opportunity to receive necessary medical and specialist care. This posed a direct threat to their lives, health and the development of the children.

With the assistance of the Commissioner and in cooperation with civil society organisations, safe logistics were organised for the family's departure, and assistance was provided in processing the documents required for their return to Ukraine. The family was safely relocated to territory controlled by the Government of Ukraine.

Upon their return, in cooperation with partner organisations, the family was provided with further support, transport and comprehensive assistance, including medical, psychological and legal support, with a particular focus on protecting the rights and best interests of the children.

Coordination with international humanitarian mechanisms remained a key component of the organisation of evacuations, in line with the provisions of Article 26 of GC IV, which stipulates the obligation of parties to an armed conflict to assist in the search for and reunification of family members separated by war.

In this context, the Commissioner continued to work throughout the year via channels of communication with the Human Rights Commissioner in the Russian Federation and with the International Committee of the Red Cross. As part of family reunification efforts, 23 Ukrainians were evacuated from the TOT in 2025.

A pregnant woman born in 2003, who was expecting her second child, appealed to the Commissioner, asking for assistance in leaving the TOT. She explained that since the start of the full-scale invasion, she and her family (namely, her daughter, husband and mother-in-law) had intended to leave the occupied territory, but due to the lack of necessary documents and the fact that her first daughter (born in 2022) only had a Russian birth certificate, it was impossible to do so on their own.

With the Commissioner's assistance, Ukrainian documents were issued for the child, after which a safe route for departure was arranged. Due to the critically short time remaining before the birth, a decision was made to organise the departure of the applicant and her daughter without waiting for her husband's documents to be processed. The day after arriving in territory controlled by Ukraine, the applicant gave birth to her second child.

At that time, her husband and mother-in-law remained in the TOT. On the day of his pregnant wife and daughter's departure, the husband was wounded in a drone attack and only received medical assistance and underwent surgery in hospital the following day.

Given the circumstances, the Commissioner's Secretariat worked to organise medical transport/evacuation for these individuals with the assistance of the International Committee of the Red Cross.

The Commissioner is working highly effectively with the International Charitable Foundation "Caritas Ukraine" on the implementation of the project "Support for refugees in territories controlled by the Government of Ukraine", aimed at supporting individuals and families who are planning to leave or have left the temporarily occupied territory of Ukraine and are returning to territory controlled by the Government of Ukraine via the Mokrany (Republic of Belarus) – Domanove (Ukraine) border crossing point.

Comprehensive humanitarian support under the project includes assistance with paperwork, provision of financial support, legal and psychological assistance, organisation of transport, as well as temporary accommodation.

This approach ensures that citizens' basic needs are met immediately upon crossing the border and creates the conditions for their subsequent reintegration. During the project's implementation period, from February to December 2025, such assistance was provided to at least 1,800 Ukrainian citizens who returned from the temporarily occupied territory in 2025.

Given the importance of the humanitarian corridor between the Republic of Belarus and Ukraine and the need to meet citizens' basic needs, and taking into account the initiative of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, the Ministry for Development of Communities and Territories of Ukraine, in cooperation

with the Volyn Regional Military Administration and the Kovel District State Administration, a humanitarian and logistics centre has been set up at the ‘Domanove’ border crossing point for the short-term stay of evacuees after they have crossed the border.

2.5. State Support for Persons Deprived of Their Liberty as a Result of Armed Aggression against Ukraine

Throughout 2025, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights received **136** appeals from civilians deprived of their personal liberty as a result of the armed aggression against Ukraine, as well as from members of their families, regarding access to social, economic, legal, medical and psychological assistance and subsequent reintegration, as provided for by the Law of Ukraine “On the Social and Legal Protection of Persons in Respect of Whom the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine Has Been Established, and Members of Their Families”.

Most frequently, the appeals concerned the establishment of the fact of deprivation of liberty, the receipt of annual financial assistance, access to medical and rehabilitation services, and the implementation of social guarantees.

Quite often, citizens made enquiries regarding the activities of the Commission on the Establishment of the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine (hereinafter – the Commission) (operating under the Ministry for Development of Communities and Territories of Ukraine in accordance with the Regulations on the Commission for Establishing the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine, approved by Resolution of the Cabinet of Ministers of Ukraine No. 1281 of 15 November 2022).

An analysis of the appeals and the position of human rights organisations indicate insufficient digitisation of procedures for recognising the deprivation of personal liberty, as well as the Commission’s limited access to state registers and information systems, which complicates the verification of information and leads to delays in decision-making.

Applicants also complained of difficulties in exercising their right to access case files and obtain clear information on the grounds for decisions made, which complicates the appeal process in cases where the fact of deprivation of personal liberty is not established.

Ensuring equality in social support for family members of civilians deprived of their personal liberty as a result of armed aggression against Ukraine, and for the families of servicemen who have been killed, are missing or are held captive, remains a systemic problem. Despite being in a similarly vulnerable situation, the families of civilians deprived of their personal liberty by the aggressor state are not covered by similar state support mechanisms.

With the intensification of the process of returning civilians, it has become apparent that there is a lack of legal regulation regarding the provision of state support to civilians released from Russian captivity until they acquire official status, the formalisation of which can take up to two months or more.

This complicates the resolution of a wide range of problems faced by citizens upon their return to Ukraine, including finding accommodation, renewing documents, obtaining means of subsistence, organising medical treatment, and educating children, among other things.

Mr and Mrs M., having been released from captivity, had no relatives in Ukraine who could provide them with adequate support. By the time it was established that they had been deprived of their personal liberty as a result of the armed aggression against Ukraine, these individuals, with the assistance of the Commissioner's Secretariat and the civil society and charitable organisations involved, had been provided with assistance in securing accommodation and social support. Following the completion of their treatment, the family was accommodated at the 'Hansen Town' complex.

The Commissioner's Secretariat has developed a procedure for the provision of services and assistance to this category of persons (approved for implementation by a decision of the Council of the KoordShtab dated 1 October 2025), which sets out the sequence of actions to be taken by state bodies in relation to the return of such persons, as well as the list and procedure for meeting their immediate needs.

On the initiative of the Commissioner and with the support of the Ministry for Development of Communities and Territories of Ukraine, the Government of Ukraine adopted Resolution of the Cabinet of Ministers of Ukraine No. 1775 of 24 December 2025 "On the Approval of the Procedure for Carrying Out Priority Measures to Support Civilians Affected by Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine, and on Amendments to Certain Resolutions of the Cabinet of Ministers of Ukraine"

In accordance with Law of Ukraine No. 2010-IX, a mechanism has been established aimed at providing urgent assistance to persons for whom the fact of deprivation of personal liberty has not been established in accordance with the procedure laid down by law. In particular, this applies to civilians released as part of prisoner exchanges or other procedures involving parties to the armed conflict or third parties, as well as persons who have returned to territory controlled by Ukraine independently.

The document provides for a range of priority support measures, including a one-off financial assistance payment of 50,000 UAH and the provision of medical, psychological, rehabilitation and legal assistance, as well as temporary accommodation.

To address gaps in the provision of support for citizens' needs, at the initiative of the Commissioner, the Government adopted Resolution No. 940 of the Cabinet of Ministers of Ukraine dated 6 August 2025 "On Amendments to the Procedure for Conducting Rehabilitation (Post-Detention, Reintegration) Measures, Adaptation Measures, and Support (Accompaniment) for Persons Whose Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine Has Been Established, Following Their Release". The amendments are aimed at improving support for civilians released from Russian captivity, in particular by assisting with the renewal of documents, the provision of medical care and other social services.

A Ukrainian citizen B. – who had been unlawfully detained by the aggressor state in the temporarily occupied territory and held under its authority – appealed to the Secretariat of the Commissioner. In October 2025, he was released and returned to territory controlled by Ukraine as part of a prisoner exchange.

Following the Commission’s initial examination of the materials, the fact of deprivation of personal liberty as a result of armed aggression against Ukraine was not established, and the case was referred for re-examination to ensure a comprehensive and objective clarification of the circumstances of the person’s unlawful detention.

During the period leading up to the conclusion of the Commission’s re-examination of the application, civil society organisations, in cooperation with the Commissioner’s Secretariat, assisted in ensuring the citizen’s basic needs were met.

Some of the appeals to the Commissioner were prompted by the fact that, upon arrival in their new communities, released civilians are forced to re-register with social service providers and prove their entitlements.

This situation stems from a lack of staff (case managers) with sufficient competence to work with persons deprived of their liberty, as well as the lack of a systematic exchange of information between social service providers when this category of persons is relocated, in particular from a healthcare facility to their place of residence (stay).

Despite the existence of legally defined obligations regarding the continuity of social support, their practical implementation remains uneven and depends to a large extent on the capacity of the specific community (paragraphs 50 and 55 of the Procedure for the implementation of rehabilitation (post-institutional, reintegration) measures, measures for the adaptation, support (accompaniment) of persons in respect of whom the fact of deprivation of personal liberty as a result of armed aggression against Ukraine has been established following their release, approved by Resolution of the Cabinet of Ministers of Ukraine No. 296 of 15 March 2024.

The results of communication with released persons and their families indicate a need to strengthen institutional oversight of the implementation of these provisions and to ensure a continuous exchange of information between social service providers.

2.6. Return of Children

As part of the implementation of the President of Ukraine’s approved Action Plan “Bring Kids Back UA”, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights is carrying out measures to return to territory controlled by Ukraine children who were deported to the Russian Federation or forcibly displaced within the temporarily occupied territories.

Since the start of the full-scale invasion, **19,546** children have been deported from Ukraine to the RF or forcibly displaced within the temporarily occupied territories. Of

these, as of 31 December 2025, **1,943** children have been returned to territory controlled by Ukraine.

During 2025, the Commissioner received **190** appeals requesting assistance in returning **314** children, who had been deported to the RF or forcibly displaced within the temporarily occupied territories, to territory controlled by Ukraine.

During this period, the Commissioner's Secretariat returned **194** children, including: with the assistance of the intermediary country Qatar – **29** children; through the mediation of US First Lady Melania Trump – **14** children.

The mother of a 13-year-old boy, A., appealed to the Secretariat of the Commissioner, asking for assistance in reuniting her with her son, who was being held in a care home in the RF.

The family lived in Mariupol. Following the start of the full-scale invasion, they were forced to move to the RF, where the child was constantly subjected to violence from his peers, prompting the family to move to Finland.

In January 2025, following persistent invitations from a Russian citizen whom her son had met via social media, the boy illegally crossed the border outside a checkpoint and was detained on Russian territory.

In the absence of a legal representative, the boy was detained, his phone was confiscated, and FSB officers interrogated him for 12 hours before eventually transferring him to a orphanage.

The mother appealed to the Finnish authorities, voluntary organisations, and the Office of the Presidential Commissioner for Children's Rights in the Russian Federation. The Ukrainian Consul in Finland insisted on submitting a request to the Commissioner for assistance in securing the boy's return, which was done at the end of August 2025.

Representatives of the Commissioner's Secretariat, with the assistance of a mediator, submitted the family's case to the Russian Federation for consideration. Constant contact was maintained with the child's mother; the procedure and strategy were explained, and assistance was provided in preparing the documents required for the mission. With the assistance of the Secretariat, in October 2025 the boy returned to territory controlled by Ukraine.

2.7. On the Realisation of the Rights of Persons Missing under Special Circumstances and the Rights of Their Family Members

Issues relating to the exercise of the rights of persons missing under special circumstances and their family members are the most frequently raised in appeals to the Commissioner. Their number is growing every year, given the ongoing armed aggression against Ukraine and the existing problems within the system of state bodies responsible for matters concerning this category of persons.

The search for missing persons is significantly hampered by limited and unreliable communication with the opposing side, whose representatives withhold information, deny access to the sites of events and manipulate data. This makes it impossible to gather

evidence properly, complicates the process of establishing the fate of individuals, and hinders the effective investigation of enforced disappearances in the temporarily occupied territory.

In 2025, the Commissioner received **26,280** appeals from family members of servicemen who went missing whilst defending their homeland and from civilians with whom contact had been lost in the occupied territory (in 2024 – 18,225 appeals).

The system for tracing persons missing under special circumstances in Ukraine is based on legislative and organisational mechanisms governing the determination of the status of such persons and the procedure for their registration. Regulatory and legal framework in this area is provided by the Law of Ukraine “On the Legal Status of Persons Missing under Special Circumstances”, provisions of criminal, civil and procedural law, subordinate legislation on the maintenance of state records and the search for missing persons, as well as Ukraine’s international obligations (in particular under the [International Convention for the Protection of All Persons from Enforced Disappearance](#)).

The main record-keeping tool is the Unified Register of Persons Missing under Special Circumstances, maintained by the MIA of Ukraine. Information regarding the search for a person missing under special circumstances is entered into the Unified Register on the basis of a search application submitted to the National Police of Ukraine.

According to the MIA of Ukraine, as of December 2025, over 80,000 people have been entered into the Unified Register of Persons Missing under Special Circumstances – military and civilian personnel, citizens of Ukraine, citizens of other countries and stateless persons who were lawfully present on the territory of Ukraine.

The search for persons missing under special circumstances is coordinated by the Commissioner for Persons Missing in Special Circumstances, whose activities are supported by the Secretariat – an independent structural unit within the MIA of Ukraine.

Certain humanitarian organisations, such as the Ukrainian Red Cross Society, carry out independent search operations and assist families in their search efforts. International partners are involved in many aspects of the work, particularly in search and identification.

The established system is constantly being improved and is designed not only to determine the fate of missing persons but also to guarantee the protection of the social, property and procedural rights and legitimate interests of their families.

In July 2025, amendments were adopted to the Criminal Procedure Code of Ukraine (Law of Ukraine No. 4555-IX of 22 July 2025 “On Amendments to the Criminal Procedure Code of Ukraine Regarding the Specifics of Pre-trial Investigation of Criminal Offences Related to the Disappearance of Persons Under Special Circumstances During Martial Law”), recommendations regarding which were contained in the Annual Report of the Ukrainian Parliament Commissioner for Human Rights on Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2024.

The provisions of the law adopted have made it possible, in certain categories of proceedings, to determine the venue for the pre-trial investigation at the place of residence of the applicants and victims who are family members of missing persons, and have simplified the exercise of their procedural rights.

The Commissioner is working to supplement existing mechanisms for ensuring the rights of missing persons and their family members.

Following appeals from citizens to the Commissioner, the Commissioner's Secretariat sent 121 letters to the Kyiv Scientific Research Institute of Forensic Expertise requesting expert examinations to identify individuals from photographs or video footage, through which (partially identified) 50 servicemen who are presumed to be held captive by the Russian Federation and were considered missing under special circumstances.

Thanks to the establishment of a systematic exchange of information regarding servicemen missing in action via the communication channel with the Human Rights Commissioner in the Russian Federation, in 2025 the Commissioner received confirmation of the captivity of **160** of our defenders who were considered missing in action. The information was provided to the Coordination Headquarters for the Treatment of Prisoners of War for recording and consideration during negotiations with representatives of the aggressor country on the exchange of prisoners of war.

To ensure effective international cooperation aimed at locating and identifying missing persons, in May 2025 the Commissioner's Secretariat signed a memorandum with the International Commission on Missing Persons. Experts from the organisation, as part of the Expert Council attached to the Representative of the Commissioner, are involved in the analysis and development of normative and legal acts concerning the protection of the rights of family members of persons missing under special circumstances.

a) On the identification of the bodies of fallen defenders

During the Commissioner's meetings with the public, relatives of missing persons raise issues that are common to the state bodies and institutions involved in this matter.

What concerns the families most is the prolonged uncertainty regarding the fate of their loved ones and the lack of clear, consistent and accessible information on the progress of the search. This state of waiting, which can last for years, is exacerbated by fragmented communication with investigators, representatives of military unit command and state authorities, and the complexity of procedures for obtaining social guarantees and formalising rights; the need to submit identical information about loved ones to different bodies is often perceived as a lack of inter-agency coordination and leads to the re-traumatisation of citizens.

Given the ongoing dialogue with families and the explanatory work carried out by both the Commissioner and other state bodies and institutions, a significant number of issues are resolved through inter-agency cooperation.

However, the issue of the duration of the identification process arises most frequently and becomes a pressing concern each time the bodies of fallen defenders are repatriated.

An analysis of the organisation of search processes and the activities of specialised state institutions carrying out forensic expert work has identified a number of factors contributing to prolonged identification: 1) the condition of the repatriated bodies (remains) of the deceased, due to the effects of weapons, the circumstances of discovery and storage; 2) the insufficient capacity of forensic institutions due to the significant

number of unidentified bodies, a shortage of resources, logistical complexities, etc.; 3) the duration of forensic molecular genetic analysis and its prioritisation over other scientifically sound identification methods that do not require significant time and material resources; 4) the absence or insufficient quantity of biometric data collected from individuals involved in operations in the combat zone (DNA samples, fingerprints, dental records).

Regulatory acts governing the procedure for inter-agency cooperation on matters relating to unidentified bodies require updating to reflect current conditions, as does the creation of an integrated information system linking state registers, the absence of which makes it impossible to conduct an effective search based on identifying features (e.g. tattoos, scars, physical characteristics, etc.).

It should be noted that the shortage of forensic experts is largely due to low pay, a heavy workload – which has increased disproportionately during martial law – and a high level of liability (both disciplinary and criminal) for the results of their work. At the same time, experts carry out their work under conditions of heightened public scrutiny and pressure from the families of missing and deceased servicemen

According to information received from state bodies, the vacancy rate for expert positions ranges from 10% in state specialised institutions subordinate to the MIA of Ukraine to 25% in institutions within the Ukrainian forensic medical examination system (under the MoH).

At the same time, the salary level of forensic experts in state specialised institutions remains comparable to that of jobs requiring lower qualifications, intensity and responsibility. The current situation is contributing to the outflow of qualified personnel – forensic experts – particularly to private laboratories.

Part Two of Article 18 (On the social protection of forensic experts) of the Law of Ukraine “On Forensic Examination” contains a provision establishing the level of basic salaries for employees of state specialised institutions who hold the qualification of forensic expert at no less than 10 times the subsistence minimum (SM for able-bodied persons in 2025 – 3,028 UAH). However, since 2017, the application of this provision has been suspended annually by laws on the State Budget of Ukraine. In the State Budget for 2026, the application of the provision has also been suspended.

b) On payments to family members of missing and captured servicemen

Despite the list of persons entitled to receive financial support for a serviceman who has been taken prisoner or is missing in action under special circumstances, as defined by Article 9 of Law No. 2011-XII, and the list of documents to be submitted by the applicant to receive such payment, as well as the procedure for its allocation, as set out in Resolution No. 884 of the Cabinet of Ministers of Ukraine dated 30 November 2016 No. 884, which sets out the list of documents to be submitted by the applicant to receive the payment, as well as the procedure for its allocation, in a number of cases the command of military units deliberately delays the established deadlines for deciding on the payment of financial support, in particular by requiring applicants to provide documents not stipulated by law for this purpose.

In a number of cases, payments already allocated to family members of a missing (captured) serviceman are not made for several months, citing a lack of funding for these purposes.

A citizen L. – whose son is being held captive – appealed to the Commissioner, complaining that, despite repeated requests and the submission of supporting documents via the TCR and SS, the military unit has failed to calculate and pay the applicant the financial allowance due to her son, in accordance with the requirements of Article 9 of Law No. 2011-XII. Due to the inaction of the military unit's command, the woman was effectively left without means of subsistence, as her son was her sole breadwinner.

A letter was sent to the MoD, as the body specifically responsible for implementing measures aimed at realising the social and legal guarantees of military personnel and their families, explaining the provisions of the legislation that had been breached as a result of the unit command's actions, and demanding that payments be made to the mother of the serviceman who is in captivity.

Following the consideration of the appeal, the military unit calculated and paid the applicant the financial allowance due to her son for the entire period of his captivity.

2. 8. Treatment of Prisoners of War of the Aggressor State

Five camps for the detention of prisoners of war have been established within the system of institutions of the State Penitentiary Service of Ukraine; the conditions of detention in these camps comply with the standards of GC III.

With a view to monitoring conditions of detention, treatment and respect for the rights guaranteed by the Geneva Conventions, staff of the Secretariat of the Ukrainian Parliament Commissioner for Human Rights carried out **11** monitoring visits to facilities holding prisoners of war from the Russian Federation in 2025. The results of these visits revealed no violations of the rights of the Russian Federation's prisoners of war. No complaints, including regarding cruel treatment or torture, were received from detainees.

Russian prisoners of war have round-the-clock access to sanitary facilities and the means to maintain hygiene. The diet is adequate in terms of quantity, quality and variety. Prisoners of war are provided with clothing, underwear and footwear appropriate to the climatic conditions. Medical care is provided at an adequate level in accordance with the needs of the detainees. The prisoners' right to communicate with the outside world, including correspondence, is fully realised. Prisoners of war are engaged in paid, safe work and have the opportunity to use their earnings to purchase goods in shops within the camps.

Unlike the Russian Federation, Ukraine ensures adequate access for international human rights and humanitarian organisations to detainees.

Following the monitoring visits, recommendations were provided to the competent authorities regarding bringing certain aspects of the detention of prisoners of war into line with the requirements of national and international legislation, in particular regarding the

issuance of identity documents to prisoners of war, the improvement of the regulatory framework governing the organisation and provision of medical care to prisoners of war, and other matters.

RECOMMENDATIONS:

To the Verkhovna Rada of Ukraine (Parliament):

to support Draft Law No. 14095 of 1 October 2025 “On Amendments to the Criminal Procedure Code of Ukraine and Other Laws of Ukraine Regarding the Optimisation of Procedures for the Search for Missing Persons and the Identification of Unidentified Bodies (Remains) During Martial Law”.

To the Cabinet of Ministers of Ukraine:

to ensure a prompt response to cases of administrative expulsion from the territory of the Russian Federation of Ukrainian citizens who do not possess identity documents, to approve an inter-agency protocol for the return of Ukrainian citizens via the territory of third states bordering the Russian Federation, setting out clear procedures for identification, temporary documentation, consular and humanitarian support, as well as coordination with international partners;

to draft and adopt a normative legal act regulating the mechanism for the return of civilians to territory controlled by the Government of Ukraine from the temporarily occupied territory of Ukraine and the territory of the RF, with a clear division of functions among central executive bodies;

to draft and submit to the Verkhovna Rada of Ukraine amendments to the Law of Ukraine “On the Social and Legal Protection of Persons Whose Deprivation of Personal Liberty Has Been Established as a Result of Armed Aggression against Ukraine, and their Family Members” to introduce social guarantees for family members of civilians deprived of their personal liberty as a result of armed aggression against Ukraine, equivalent in scope to the guarantees established for family members of military personnel who have been killed or taken prisoner;

to develop procedures for cooperation between the Ministry of Social Policy, Family and Unity of Ukraine and the Ministry of Health of Ukraine regarding the exchange of information on the needs of civilians in respect of whom the fact of deprivation of personal liberty as a result of armed aggression against Ukraine has been established, and their family members, during their displacement and reintegration into communities;

amend the Regulations on the Commission for Establishing the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine, approved by Resolution of the KMU No. 1281 of 15 November 2022, and relevant legislation, to provide for:

- expanding the Commission's access to state registers and information and communication systems;

- ensuring the digital transformation of the processes for submitting, examining and tracking applications, and establishing clear deadlines for the examination of applications;

- ensuring the right of applicants who apply to the Commission regarding the establishment of the fact of deprivation of personal liberty as a result of armed aggression against Ukraine to familiarise themselves with the case materials (except for information with restricted access), to receive reasoned decisions and comprehensive information on the procedure and methods for appealing them;

with a view to ensuring the proper realisation of the rights of persons involved in repelling and deterring armed aggression by the Russian Federation and/or other states against Ukraine, to draft and, in accordance with established procedure, submit for registration a draft regulatory act on the procedure for the collection, storage and use of dental information for the aforementioned category of persons;

to align the regulatory framework governing the procedure for inter-agency cooperation regarding the handling of unidentified bodies (remains) of deceased (fallen) persons received during repatriation operations with current challenges;

to amend the order of the Ministry of Internal Affairs of Ukraine, the Ministry of Health of Ukraine, the Office of the Prosecutor General "On the Approval of the Procedure for Interaction between the Bodies and Units of the National Police of Ukraine, Healthcare Institutions and the Prosecutorial Authorities of Ukraine in Establishing the Fact of a Person's Death during Martial Law on the Territory of Ukraine" dated 9 March 2022 No. 177/450/46;

with a view to preserving the staffing levels and ensuring the proper functioning of Ukraine's specialised state institutions, to consider the issue of reinstating the second part of Article 18 of the Law of Ukraine "On Forensic Examination".

To the Ministry of Defence of Ukraine:

to ensure the allocation of the necessary funds to military units for the timely financing of designated payments to family members of military personnel taken prisoner or held hostage, as well as those interned in neutral states or missing in action. Ensure effective monitoring of compliance by the command of military units with the requirements of the Procedure for the payment of financial support to the families of

military personnel taken prisoner or held hostage, as well as those interned in neutral states or missing in action, approved by Resolution of the Cabinet of Ministers of Ukraine No. 884 of 30 November 2016.

To the Ministry for Development of Communities and Territories of Ukraine:

to ensure systematic information support and counselling for civilians deprived of their personal liberty as a result of armed aggression against Ukraine, and their family members, including through the preparation of standardised information materials and explanations.

To the Ministry of Health of Ukraine:

to establish a working group with the aim of introducing an integrated data management system (hereinafter - IDMS) for the entry, storage, processing and use of data based on the results of examinations of unidentified bodies (remains) of persons, who died (killed) as a result of armed aggression against Ukraine, and to draft amendments to regulatory and legal acts to ensure the functioning of the relevant module.

3. ENSURING HUMAN RIGHTS WITHIN THE SECURITY AND DEFENCE SECTOR

Number of appeals	44,783
Number of proceedings	139
Number of rights restored (individual and collective)	4,579
Number of draft normative and legal acts reviewed	455
Number of monitoring visits (on-site and off-site)	59

The focus of the institution's staff within the security and defence sector was on safeguarding the rights of conscripts, military personnel, law enforcement officers, prisoners of war, persons unlawfully detained by the aggressor state, those missing in action under special circumstances, deceased military personnel, as well as family members of these categories of citizens.

Of the total number of issues raised in appeals relating to the security and defence sector, **26,280** concerned the realisation of the rights of persons missing under special circumstances and their family members; **3,925** concerned the rights of servicemen held captive and their family members; **11,488** appeals concerned the observance of the rights and freedoms of Ukrainian citizens during mobilisation measures and their subsequent participation in repelling and deterring armed aggression against Ukraine, including the rights to medical care, discharge from military service, payment of due financial allowances, etc.

3.1. Ensuring the Rights of Conscripts and Those Liable for Military Service

The state of compliance with constitutional human rights during mobilisation measures is an important, topical and extremely sensitive issue for society.

In accordance with Articles 17 and 65 of the Constitution of Ukraine, the protection of Ukraine's sovereignty and territorial integrity is one of the state's most important functions and a duty of Ukrainian citizens.

In the context of repelling and deterring armed aggression against Ukraine, it is the state's duty to ensure citizens' rights during conscription as part of mobilisation and the subsequent fulfilment of the constitutional duty to defend the homeland.

The number of appeals from citizens regarding alleged violations of fundamental rights during mobilisation measures under martial law has been rising since the start of the full-scale armed aggression by the Russian Federation against Ukraine: in 2022, the institution received only 18 appeals; in 2023 – 514; in 2024 – 3,312; in 2025 – **6,127** appeals were registered.

Not all violations described by applicants in the appeals submitted to the Commissioner were confirmed during subsequent verification; however, this trend is indicative of a systemic crisis.

Contrary to the position of the Ukrainian Parliament Commissioner for Human Rights and the comments he submitted on the draft law “On Amendments to Certain Legislative Acts of Ukraine Concerning Specific Issues of Military Service, Mobilisation and Military Registration” (Reg. No. 10449 of 30 January 2024), the amendments to the Law were adopted. This resulted from the enshrinement in law of the right of military personnel of the TCR and SS to carry out conscription into military service during the mobilisation of citizens, regardless of the latter’s place of registration for military service, and, in violation of Article 17 of the Constitution of Ukraine, the granting of the right to military personnel to check citizens’ documents.

Notwithstanding the existing powers of military authorities when conscripting Ukrainian citizens into military service during mobilisation (as defined, in particular, by the Laws of Ukraine “On Military Duty and Military Service”, “On Mobilisation Preparation and Mobilisation”, Resolution of the Cabinet of Ministers of Ukraine No. 560 of 16 May 2024 “Issues of Conscription of Citizens into Military Service during Mobilisation, for a Special Period”), as well as the military authorities’ communication of the procedure (algorithm) for the actions of the TCR and SS when conscripting citizens into military service, the number and content of appeals received by the Commissioner indicate that the requirements of the aforementioned regulatory acts are not being met:

- unlawful detention of citizens, forced delivery to the premises of the TCR and SS, and the withdrawal of National Police officers from the procedure;

- the forced and unlawful detention of people, the denial of access to lawyers, the mobilisation of citizens without lawful grounds, including through the formal process of the military medical commission.

The Commissioner has approved a draft law that will increase the liability, including criminal liability, of officials of the TCR and SS, as well as members of the VLC, for improper performance of their official duties and violations of mobilisation legislation.

The Verkhovna Rada of Ukraine has adopted as a basis the draft Law of Ukraine “On Amendments to the Criminal Code of Ukraine Regarding the Introduction of Criminal Liability for Violations of Legislation on Defence, Mobilisation Preparation and Mobilisation Committed by Heads of Territorial Recruitment and Social Support Centers, and Chairs and Members of Military Medical Commissions”.

The issue of human rights compliance in the context of mobilisation in Ukraine has attracted the attention of authoritative international human rights organisations and institutional mechanisms.

The UN Independent International Commission of Inquiry on Ukraine, in its report for March 2026, documents systematic violations accompanying the conscription of citizens in Ukraine, including: the detention of men without proper legal justification, the denial of the opportunity to contact a lawyer or inform relatives of their whereabouts, the unlawful seizure and damage of personal belongings, etc. In some cases, representatives of territorial recruitment centres denied that individuals were being held in official premises.

The state must act within the law even in times of war, maintaining a balance between the need to strengthen the country’s defence capabilities and respect for the

inalienable rights of citizens, whilst ensuring equality before the law, as guaranteed by Article 24 of the Constitution of Ukraine.

a) Respect for citizens' rights during mobilisation procedures and deployment to places of military service

The most common complaints concern unlawful restrictions on freedom of movement during the detention and transfer of conscripts to TCR and SS, superficial medical examinations conducted by military medical commissions, violations during the consideration of applications for deferment from conscription, and the unlawful detention of individuals in TCR and SS until their dispatch to military units. In effect, the TCR and SS are turning into places of detention.

In certain, particularly high-profile cases, such violations have led to actions constituting disciplinary or criminal offences.

After receiving information via the media regarding the death of conscript I., the Commissioner dispatched a monitoring team to the TCR and SS in Shevchenkivskyi District of Kharkiv.

The group established that citizen I. had committed suicide by jumping out of a window after spending three days at the Territorial Recruitment Centre.

Despite the absence of any signs of violent actions by TCR and SS staff towards the deceased, the causes of this tragic incident were the failure to comply with the requirements set out in regulatory acts regarding the procedure for conscripting citizens into military service during mobilisation, the restriction of freedom without appropriate legal grounds, and the unjustifiably prolonged detention of the said Ukrainian citizen on the premises of the territorial centre.

Details of the incident have been entered into the Unified Register of Pre-trial Investigations, and investigative measures are being carried out.

Following the monitoring, recommendations have been provided to the Ministry of Defence, the General Staff of the AFU, and the heads of the relevant TCR and SS to eliminate the grounds and conditions for the aforementioned violations, and clarifications have been provided regarding strict compliance with legal requirements and service discipline when conscripting citizens during mobilisation.

Some of the violations highlighted in the appeals submitted to the Commissioner relate to the procedures for carrying out public notification campaigns and the actions of military personnel from the TCR and SS, who transport citizens to the Territorial Recruitment Centres without the involvement of police officers.

The Commissioner received information regarding actions taken against citizen N., which appeared to involve his forcible detention and subsequent compulsory transfer by a recruitment team to the Volodymyr RTCR and SS of Volyn

region, as well as his conscription, despite the fact that he is unfit for military service (on medical grounds) and had been removed from the military register.

An investigation into the violations of the aforementioned citizen's rights was conducted by the Lutsk Regional Department of the MLE, during which it was established that the head of the said territorial centre had organised a referral to the VLC and carried out the conscription of citizen N, who had been removed from military registration, thereby exceeding his official powers.

Following the investigation into the head of the Volodymyr RTCR and SS, a report on an administrative offence was drawn up.

The inaction of officers from the National Police – whose remit is to protect human rights and freedoms and to ensure public safety and order – also led to violations of citizens' rights during mobilisation; whose remit during mobilisation includes ensuring the implementation and procedural documentation of administrative detention measures and the delivery to the TCR and SS of persons who refuse to accept summonses or have breached military registration rules. In reality, however, the procedure followed by the notification teams – comprising representatives of the TCR and SS and National Police officers – is such that it does not allow a citizen, upon being stopped, to fully and reasonably explain their position: typically, National Police officers identify themselves and check documents, and then hand the citizen over to TCR and SS staff, who, without any grounds for doing so, take the person to the territorial recruitment centre, sometimes despite the existence of documents regarding deferment from conscription and the fact that registration details have been entered into the 'Reserve+' application, etc.

Citizen P., a father of five, appealed to the Commissioner, requesting assistance in securing justice regarding the abuse of power by staff members of the Sarny RTCR and SS.

In May 2025, citizen P. was stopped on the street by a group of individuals in camouflage clothing and balaclavas, who identified themselves as employees of the TCR. A person in police uniform was present with them. Whilst the police officer stood by, the men in camouflage forcibly dragged the complainant into a minibus and took him to the location of the medical examination, and subsequently to the premises of the Sarny RTCR and SS. In the process, citizen P. sustained bodily injuries, his mobile phone was seized and, despite his injuries, he was not provided with medical assistance. Given the existence of documents confirming his deferment from conscription into military service, P. left the premises of the RTCR and SS the following morning and, after seeking treatment at a hospital, was admitted.

The Sarny RPD MDNP in Rivne region is conducting a pre-trial investigation in criminal proceedings under Part 1 of Article 122 of the CC of Ukraine regarding the infliction of bodily harm on the victim.

Following an investigation initiated by the Commissioner, the actions of the military personnel of the RTCR and SS notification group were found to contain elements of a criminal offence under Part 5 of Article 426-1 of the CC of Ukraine, and the head of the RTCR and SS and his deputy were held disciplinarily liable.

It is precisely the lack of appropriate technical equipment for data retrieval within the notification teams that leads to the constant violation of citizens' rights by military personnel and National Police officers during their forced transfer to the premises of the TCR and SS for 'information verification'. In some cases, the rights of citizens who practise as independent professional lawyers and provide legal assistance to those liable for military service are also violated. Furthermore, obstructing lawyers' access to clients at the TCR and SS not only violates citizens' right to legal assistance but also creates conditions for further abuses.

Citizen K., who had provided legal assistance as a lawyer to citizen S., appealed to the Commissioner. During the posting of bail and the release of citizen S. from the State Institution 'Dnipro Penitentiary Institution No. 4', employees of the Central-Chechelivskyi RTCR and SS of the city of Dnipro committed acts constituting a criminal offence, in particular assault.

Following the Commissioner's appeal, the Investigative Department of the MDNP in Dnipropetrovsk region entered details of the criminal offence into the Unified Register of Pre-trial Investigations on the grounds of a crime under Article 389 of the CC of Ukraine concerning the intentional infliction of bodily harm on a defence lawyer in connection with activities related to the provision of legal assistance. Supervision of the pre-trial investigation of the criminal proceedings was also ensured by the Dnipropetrovsk Specialised Prosecutor's Office for the Eastern region.

Following monitoring visits carried out by staff of the Commissioner's Secretariat to the TCR and SS in the Kharkiv and Kyiv regions during the second half of 2025, several issues were identified in the operation of the territorial centres, which are adversely affecting the quality of mobilisation measures. These include, in particular:

1. Staffing inadequacies – individuals with no experience of working with the civilian population are being appointed to posts in the TCR and SS, and military personnel from combat zones are being recruited without undergoing psychological adaptation.

During a review of media reports, information was received regarding the unfounded and unjustified abuse of official powers and the use of firearms by officers of one of the TCR and SS in the Volyn region during the physical apprehension of a resident of the region – citizen H. – who has been removed from military registration as a person with a disability.

Following the Commissioner's immediate response to the incident and a proactive report from units of the Military Law Enforcement Service, it was confirmed that actions constituting a criminal offence had been committed against citizen H. This included the failure of TCR and SS officers to provide assistance to the victim after he had sustained a gunshot wound.

The investigation into the circumstances of the incident, classified under Part 5 of Article 426-1 of the CC of Ukraine as an abuse of power or official authority by a military official (under martial law), is ongoing as part of criminal proceedings.

2. The incomplete provision of video recording equipment to alert teams and the lack of devices for scanning the digital codes on military registration documents, leading to unfounded demands to “proceed to the TCR” to verify data that is already in the system.

During monitoring visits to regional centres, it was found that the notification teams of the TCR and SS were inadequately and incompletely equipped with technical devices capable of photo and video recording, as well as devices capable of scanning military registration documents in electronic form. This creates unnecessary tension in communication with conscripts, leads to the unlawful disclosure of information (personal data of conscripts) and the violation of the rights of conscripts during the verification of military registration documents, and also fails to ensure the protection of military personnel in the notification groups in the event of an appeal or an official investigation into their actions.

3. The conditions of detention for citizens in regional reception centres do not meet the standards laid down by law.

In accordance with Articles 3 and 8 of the Constitution of Ukraine, the human being, their life and health are the highest social value; and pursuant to Article 29 of the Constitution of Ukraine, no one may be arrested or detained except by a reasoned court decision and only on the grounds and in the manner prescribed by law.

In accordance with the provisions of Ukraine’s criminal procedural legislation and the Code of Ukraine on Administrative Offences, officials of the TCR and SS are not among the entities authorised to carry out the detention of persons and their subsequent custody. Territorial Centres also do not have the status of temporary detention facilities or penal institutions. Any restriction of liberty on the premises of the TCR and SS without a court order contravenes Article 5 of the European Convention on Human Rights.

The observance of citizens’ rights whilst on the premises of the TCR and SS is adversely affected by the ban on the use of mobile communication devices and the failure of the territorial centres to inform family members and relatives about the conscription of citizens into military service.

The unlawful restriction of citizens’ freedom of movement by TCR and SS staff, the abuse of authority during detention, the unlawful seizure of personal belongings and mobile communication devices, the infliction of bodily harm, the conscription of citizens despite the existence of deferrals (reserve status) and other violations of rights negatively impact the state’s image and discredit the mobilisation processes in Ukraine.

The Commissioner has received information regarding the unfounded and unjustified abuse of authority by the Zakarpattia TCR and SS in relation to citizen K., who, during conscription and at the start of his military service, sustained beatings and physical injuries (multiple fractures of the skull and facial bones). The citizen was also conscripted despite having a valid deferment; following the injuries sustained, he underwent inpatient treatment and was declared temporarily unfit for military service.

Following a proactive response to the incident, which contained signs of a criminal offence, the Commissioner immediately notified the Military Law Enforcement Service, which, during its investigation, fully confirmed the aforementioned circumstances.

To date, the incidents involving the abuse of official authority by military personnel of the Uzhhorod RTCR and SS and the military unit in which soldier K. was serving are the subject of two criminal investigations under Part 5 of Article 426-1 of the CC of Ukraine (Exceeding authority or official powers by a military official) and Part 3 of Article 406 of the CC of Ukraine (Violation of statutory rules governing relations between military personnel).

Overall, in 2025, based on materials submitted by the Commissioner's Secretariat, pre-trial investigation authorities entered details into the Unified Register of Pre-trial Investigations and are conducting procedural actions in relation to **34** cases of human rights violations during the conscription process in the context of mobilisation.

Another issue requiring an immediate response from the Commissioner was the failure of local authorities and the management of regional TCR and SS to comply with the requirements of Resolution No. 560 of the Cabinet of Ministers of Ukraine dated 16 May 2024, "Issues of Conscription of Citizens into Military Service during Mobilisation, for a Special Period". According to this resolution, assembly points with adequate living and sanitary conditions must be established for the formation of units of mobilised citizens. However, the actual situation differs significantly from the regulatory requirements.

Assembly points are established by joint decisions of the executive bodies of village, settlement and city councils and district (city) TCRs and SSs for the assembly of military units and their dispatch to military units, in accordance with paragraphs 92 and 93 of the Procedure for the conscription of citizens into military service during mobilisation for a special period (approved by Resolution of the Cabinet of Ministers of Ukraine No. 560 of 16 May 2024).

The powers of local executive authorities and local self-government bodies include the material and financial support of mobilisation measures, in particular the allocation of buildings, structures, land plots, transport and other material and technical resources, as well as ensuring the operation of assembly points for conscripts and the dispatch of conscripted citizens to their places of military service.

However, the establishment of assembly points is carried out predominantly using the limited resources of the relevant territorial recruitment centres, without adequate material and financial support from the authorised bodies and without the creation of appropriate operating conditions (fitting out premises for the accommodation of conscripts, the formation of military units, medical facilities and catering areas).

During monitoring visits carried out by staff of the Commissioner's Secretariat to TCRs and SSs in Kyiv city and Kyiv region, violations of the rights of conscripts and citizens called up for military service were identified whilst they were staying at military assembly points in district territorial centres. In particular, at the Bila Tserkva RTCR and SS, it was noted that individuals were being held in premises unsuitable for prolonged stays: without adequate sleeping facilities, organised meals, or compliance with sanitary and hygiene standards. This constitutes a direct violation of Article 5 of the European Convention on Human Rights concerning the right to liberty and security of person.

Following the monitoring results, recommendations were provided to the management of the territorial centres regarding the refurbishment of assembly points and the improvement of conditions for citizens at the TCR and SS prior to their dispatch to military service locations, and a deadline was set for rectifying the shortcomings.

However, the situation began to change significantly only after public outcry in the media.

The Commissioner sent letters to the command of the Ground Forces of the AFU and the Kyiv RMA demanding that those responsible be held to account for undermining legal norms.

In addition, response letters were sent to the Ministry of Defence of Ukraine and regional military administrations regarding the organisation and proper provision of assembly points, as well as demanding that citizens' rights be respected whilst they are at territorial recruitment and social support centres.

Furthermore, in 2025, taking into account the Commissioner's recommendations aimed at protecting the rights of conscripts and mobilised personnel, the Government adopted Resolution No. 1779 on the provision of food to conscripted citizens in accordance with the dietary standards for personnel of the AFU.

b) Violation of the Rights of Citizens with Grounds for Deferment from Military Service during Mobilization

Throughout 2025, the Commissioner received complaints regarding violations of the rights of citizens who are not subject to conscription, as well as those who exercised their right to a deferment from military service on the grounds defined by Article 23 of the Law of Ukraine "On Mobilization Training and Mobilization".

Citizen D., the father of a child with a disability, appealed to the Commissioner requesting a response to the inaction of the TRSSC and the MoD of Ukraine during the consideration of his application for a deferment from mobilization. The applicant submitted his application and the documents required to extend a previously granted deferment to the Rivne District TRSSC in June 2025; however, he received no official response. After the 15-day period for considering the deferment application expired, citizen D. filed two written complaints regarding the TRSSC's actions through the

Government Contact Centre but received no response to these appeals. Given the uncertainty regarding the deferment, the applicant was granted a deferment by the enterprise where he has worked since 2024. Nevertheless, despite timely updating his military registration data, the existence of the corporate deferment, and the submitted documents for the deferment extension, citizen D. was declared a person searched by the TRSSC. Following an inquiry sent by the Commissioner to the Command of the Land Forces of the AFU, the citizen's rights were restored: the "military registration violator" status was revoked, the TRSSC search was terminated, and citizen D.'s application was approved, granting him the right to a deferment from military service during mobilization.

Specifically, cases were recorded where citizens were conscripted despite having a properly formalized right to a deferment (including citizens with a deferment for the mobilization period), and violations were noted during the processing of applications regarding the granting of mobilization deferment.

Citizen H., who held a right to deferment in accordance with an Order of the Ministry of Economy as an employee of JSC "Ukrzaliznytsia" (classified as a critical infrastructure facility of Ukraine), appealed to the Commissioner regarding the violation of his rights and his conscription by the Stryi District TRSSC. In deciding to conscript the mentioned individual, who held a valid right to deferment (under a procedure approved by the military administration body - the General Staff of the AFU), officials of the Stryi District TRSSC exceeded their statutory powers and committed a violation of the rights of the person liable for military service, which led to a judicial appeal of their actions. Only following an proactive appeal by the Commissioner to the Command of the Land Forces of the AFU were the citizen's rights restored: the enforcement of the court decision was ensured, the inaction of the officials was recognized as unlawful, and the order for the conscription and assignment of citizen H. to military service was canceled.

The issue of violating the rights of citizens who have grounds for a deferment remains unresolved to this day. In cases of unlawful mobilization, there are no legal grounds for discharge from military service due to the inconsistency of certain provisions of the Laws of Ukraine, which requires an urgent solution.

Furthermore, a court's establishment of the fact of unlawful actions during conscription does not lead to any consequences regarding the restoration of the plaintiff's rights, while the official of the state authority is exempted from liability for violating procedural norms in the field of mobilization; thus, guarantees of judicial protection of rights and freedoms take on a declarative character.

The Cassation Administrative Court of the Supreme Court considered a case filed by a serviceman who was conscripted during mobilization without a proper medical examination. The courts of first and appellate instance recognized the conscription

actions as unlawful and ordered the military unit to discharge the plaintiff from military service.

However, the Cassation Administrative Court of the Supreme Court overturned this decision regarding the method of protection, formulating a fundamental conclusion: the conscription procedure during mobilization is irreversible, and recognizing it as unlawful does not entail the automatic discharge of the person from military service (Resolution of the Supreme Court of February 5, 2025, in Case No. 160/2592/23).

The Court justified this by stating that discharge from service is regulated by separate legal relationships and an exhaustive list of grounds provided by law, which were not examined by the courts.

At the same time, the Cassation Administrative Court of the Supreme Court did not offer any effective alternative method of protecting the violated right, which makes the decision dangerous in the context of human rights protection, contradicts the principle of the rule of law and the foundations of effective judicial protection, and poses a serious threat to public trust in the justice system.

c) Violation of Citizens' Rights in the Maintenance of Military Records of Conscripts, Persons Liable for Military Service, and Reservists

The conducted analysis indicates that common causes of violations of citizens' rights are the incorrect entry of information into the military registration system.

Throughout the year, **70** appeals were received from citizens regarding the imperfect organization of electronic information interaction between the Unified State Register of Conscripts, Persons Liable for Military Service, and Reservists (hereinafter referred to as the Register) and other state registers, as well as the entry of inaccurate information about persons liable for military service into the Register.

Citizen B. appealed to the Commissioner regarding the violation of his rights during military registration by the Zhytomyr District TRSSC through groundless reinstatement on the military register and the entry of corresponding data into the Unified State Register of Conscripts, Persons Liable for Military Service, and Reservists.

The applicant reported that in April 2005, he underwent a military medical commission (MMC), which found him unfit for military service and removed him from the military register, as confirmed by copies of medical and military registration documents. The applicant's appeals to the Zhytomyr District and Regional TRSSCs regarding the entry of up-to-date information on his military registration status were left unaddressed.

Thanks to the Commissioner's intervention, the applicant's petition to enter information into the Register database regarding his removal from the military register as a person found unfit for service by the MMC was resolved, and the applicant's rights were restored.

Additionally, the issue of unlawful entry of information into the Register concerns persons liable for military service and reservists who are in the reserve of the SSU and intelligence agencies, whose military registration is established by said bodies and maintained separately.

In particular, such information was entered into the Register without prior verification of the records of the SSU and intelligence agencies in accordance with Paragraph 17-1 of the Resolution of the Government of Ukraine No. 932 of August 16, 2024.

Consequently, repeated enrolment in military registration and the entry of information into the Register regarding persons liable for military service and reservists in the reserve of the SSU and intelligence agencies violates the military registration procedure established by the aforementioned regulatory acts.

Furthermore, a common violation of citizens' rights by military administration bodies and the National Police during mobilization measures is the unlawful inclusion of citizens in the so-called "evaders database". The unlawful entry of data regarding violations of military registration rules into the Unified State Register (Law of Ukraine "On the Unified State Register of Conscripts, Persons Liable for Military Service, and Reservists", hereinafter referred to as the "Oberih" register, Law No. 1951-VIII) was consistently used as a ground for the detention and unlawful holding of persons for the purpose of their mobilization.

According to Paragraph 20-1 of Part 1 of Article 7 of Law No. 1951-VIII, personal data includes information on holding a person liable for military service administratively responsible for committing administrative offenses provided for by Articles 210 and 210-1 of the CoAO of Ukraine, namely: the date, number, and brief summary of the protocol and/or resolution on the administrative offense.

Therefore, information about violations of military registration rules should be entered into the "Oberih" register only after a person has been held administratively liable.

Performing such actions without issuing a resolution to hold the person administratively liable constitutes a violation of the citizen's rights.

d) Violation of Citizens' Rights During the Conduct of Military Medical Commissions

The Commissioner received **1,721 appeals** regarding health care, medical support, and the performance of military medical examinations by Military Medical Commissions (MMCs), which determine the fitness of persons liable for military service based on their health status.

The appeals concern issues related to incomplete and non-comprehensive reviews of medical documents by MMCs, the failure to refer individuals for additional examinations, disagreements with MMC conclusions and the right to appeal them, and violations of reasonable timeframes for the approval of commission findings by higher-level MMCs.

Determining the degree of fitness for military service falls within the exclusive competence of MMCs. At the same time, establishing the presence or absence of a specific diagnosis and deciding on fitness or unfitness for service – particularly with the removal from the military register - are discretionary powers of the MMCs. However, it is precisely in this area that abuses occur across all levels of MMCs, primarily within MMCs at district (city) TRSSCs. Citizens are often brought there, and commission chairs issue an official conclusion of fitness within an extremely short timeframe.

Citizens' appeals indicate that during MMC examinations, doctors frequently ignore medical documents provided by citizens that indicate existing illnesses. Examinations by medical personnel may be superficial, lasting only a few minutes, and often conducted without the involvement of specialists from all required fields (surgeon, physician, neurologist, ophthalmologist, otolaryngologist, gynaecologist (for women), and other specialists, if necessary, by medical considerations).

In practice, chairpersons of MMCs frequently violate the Regulation on Military Medical Examination in the Armed Forces of Ukraine, approved by Order of the Minister of Defence of Ukraine No. 402 of August 14, 2008, registered with the Ministry of Justice of Ukraine under No. 1109/15800 on November 17, 2008. This, in turn, leads to violations of the citizens' right to appeal the decisions made.

After undergoing an MMC at the Metalurhiino-Dovhyntsiivskyi Joint Districts TRSSC, Citizen B. disagreed with the commission's conclusion, which contradicted a diagnosis established at the end of 2024 after an examination in a civilian hospital.

Citizen B. appealed the MMC's conclusion while being transported to the military units where he had been assigned. Notably, the commands of the military units where citizen B. arrived refused to enrol him in their staff after reviewing his diagnosis, which was confirmed by civilian hospital records. Meanwhile, the Dnipro Regional TRSSC, where the actions of the MMC and the inaction of the Joint Districts TRSSC were appealed, failed to respond to the applicant within the prescribed timeframe.

Following the Commissioner's inquiry to the Command of the Land Forces of the AFU, citizen B.'s right to appeal the MMC decision was restored, and a decision was made to conduct a control examination of the applicant at the MMC of the Regional TRSSC.

Appeals also concerned the entry of biased data into the military registration system regarding fitness for service.

In 2022, citizen M. was removed from the register, but in 2025, he was reinstated by the Khadzhybei District TRSSC and recorded as a military registration violator.

The citizen underwent a repeated MMC, which confirmed his unfitness for service. The documents were sent to the 18th Regional MMC.

Due to a violation of the processing deadline by said Regional MMC, citizen M. appealed to the Commissioner.

After urgent action by the Commissioner, citizen M.'s certificate of illness was confirmed, and steps necessary to remove him from the register were taken.

Similar complaints were submitted by citizen T. and citizen Kh., whose rights were violated by the Kamianets-Podilskyi and Chernivtsi District TRSSCs, respectively. Both were removed from the register due to unfitness, with Citizen Kh. being a person with a Category II disability due to war. Instead, TRSSC officials demanded they submit applications for deferment as if they were still liable for service. Following the Commissioner's intervention, their registration data was updated by the responsible military administrative bodies.

3.2. Alternative Service During Martial Law

Violations of rights are reported in **1,669 appeals** from individuals who, despite their religious convictions, were sent to military units, contrary to Article 35 of the Constitution of Ukraine, which provides grounds for replacing military duty with alternative (non-military) service.

This constitutional provision was not restricted during the state of martial law. Similar legal norms, stipulating the state's right to compel citizens to serve is not absolute and is limited by the right to conscientious objection, particularly on religious grounds, are established in international treaties recognized as obligatory by the Parliament of Ukraine (e.g., Article 9 of the ECHR, Article 18 of the International Covenant on Civil and Political Rights).

However, the current version of the Law of Ukraine "On Alternative (Non-Military) Service" (hereinafter referred to as the Law No. 1975-XII) does not provide for the assignment of citizens to alternative service under mobilization during a special period instead of the military service. Currently, the regulation of the right to the assignment of citizens to alternative service under mobilization during a special period is an indicator of compliance with EU standards on fundamental rights included in the Rule of Law Roadmap for the EU Membership.

To remove obstacles to the right for the replacement of military duty with alternative (non-military) service under mobilization during a special period stipulated by Article 35 of the Constitution of Ukraine, the Commissioner sent proposals to the Chairpersons of Parliamentary Committees and the Prime Minister during 2023–2025. Relevant recommendations are also contained in the Annual Report of the Commissioner on the State of Observance and Protection of Rights and Freedoms of Individual and Citizen in Ukraine in 2024.

Today, the lack of a resolution on this issue may be interpreted as a violation of the European Convention on Human Rights. The situation requires a legislative solution through amendments to Law No. 1975-XII or Article 23 of Law No. 3543-XII. In 2025, the state ensured the right to alternative service for clergy through existing deferment mechanisms. The State Service of Ukraine for Ethnopolitics and Freedom of Conscience (hereinafter referred to as the DESS) issued several orders regarding granting deferments to the clergy, defining religious organizations as critical to the economy and life of the population.

In order to eliminate obstacles to the implementation of the right of citizens for the replacement of military duty with alternative (non-military) service guaranteed by Article 35 of the Constitution of Ukraine during conscription into military service in course of mobilization for a special period, the Commissioner, in accordance with the established procedure, during 2023-2025, sent proposals on the need to make relevant amendments to the Law of Ukraine No. 1975-XII to the Chairpersons of the Committees of the Parliament of Ukraine and the Prime Minister of Ukraine. The relevant recommendations have also been included in the Annual Report of the

Commissioner on the State of Observance and Protection of Rights and Freedoms of Individual and Citizen in Ukraine in 2024.

The lack of a decision on this issue today can be interpreted as a violation of the European Convention on Human Rights. The situation requires a legislative solution by amending the current or adopting a new version of the Law of Ukraine No. 1975-XII or amending Article 23 of the Law of Ukraine No. 3543-XII on exemption from military service during mobilization of citizens whose religious beliefs on the day of the mobilization announcement did not allow for military service, and who belonged to religious organizations operating in accordance with the legislation of Ukraine, the doctrine of which prohibits the use of weapons.

Throughout 2025, employees of the Commissioner's Secretariat actively participated in the work of the interdepartmental working group chaired by the Head of the DESS, where issues of ensuring the constitutional right to alternative service for clergy were raised. Despite the lack of amendments to the Law of Ukraine No. 1975-XII, in 2025 the state ensured the right to alternative service for clergy through the existing mechanisms of deferment and exemption from conscription provided for persons performing religious service.

The DESS developed a number of regulatory acts for the purpose for granting deferments to the clergy:

Order of the DESS "On Certain Issues of Granting Deferments to the Clergy Subject to Military Service for the Period of Mobilization and Time of War" No. H-21/11 of February 5, 2025, which approved the Criteria for determining a religious organization as critically important for the functioning of the economy and ensuring the vital activity of the population in a special period and the List of positions of clergy subject to military service, which are subject to deferment for the period of mobilization and wartime;

Order of the DESS No. H-177/11 of November 10, 2025 (Order of the DESS "On Approval of the Procedure for Submitting Documents for Granting Deferments to the Clergy for the Period of Mobilization and Time of War" No. H-177/11 of November 10, 2025, which approved the Procedure for submitting documents for granting deferments to the clergy for the period of mobilization and time of war);

Order of the DESS "On Approval of the List of Legal Entities - Religious Organizations that are Critically Important for the Functioning of the Economy and Ensuring the Life of the Population in a Special Period" No. N-82/11 of June 6, 2025, which approved the list of legal entities - religious organizations that are critically important for the functioning of the economy and ensuring the life of the population in a special period.

3.3. Exercise of Rights of Military Personnel and Law Enforcement Officers

The consequences of improper mobilization organization directly affect the combat readiness and psychological state of active military personnel.

The lack of effective mechanisms for transitioning between units, the lack of response of the command to personnel appeals, failure to comply with the terms of deferment of conscription after the end of the contract and other violations undermine

citizens' trust in the state and form a persistent practice of violating the rights of military personnel.

Under such conditions, service and psychological exhaustion, lack of rotations and vacations, and worsening family circumstances are recorded as the main factors of absence without leave, in particular by volunteer servicemen and motivated soldiers. Thus, the phenomenon of absence without leave (hereinafter referred to as AWOL) is a symptom of systemic violations of the rights of servicemen.

Legislative inconsistency between the grounds for deferment of conscription and the grounds for discharge from military service deprives unlawfully drafted citizens of the opportunity to restore their rights out of court, and the protection of a serviceman's rights in court is complicated by the conditions of military service.

In view of this, one of the strategic areas of the Commissioner's activity remains the issue of ensuring the rights of citizens of Ukraine who serve in the MoD of Ukraine, the AFU, the State Special Transport Service, the MIA of Ukraine, the NGU, the NPU, the SBGS, the SMS, the State Emergency Service of Ukraine, the SSU, the Department of the State Protection of Ukraine, the State Service of Ukraine for Special Communications and Information Protection, intelligence agencies of Ukraine, as well as members of their families.

During the reporting period, the Commissioner received 5,361 applications from military servicemen, law enforcement and intelligence officers, and their family members regarding financial support, rotation of units from the area of combat operations, medical support, evacuation of wounded servicemen, completion of the MMCs, as well as discharge from military service etc.

a) Violation of the Right to Adequate Financial Support

Throughout the year, the Commissioner received **855** appeals regarding possible violations of the rights of military personnel and their family members to receive financial support.

Regarding the payment of financial support (up to UAH 100,000), determined by the Resolution of the Government of Ukraine No. 168 of February 28, 2022 “On the Issues of Certain Payments to Military Personnel, Rank-and-File and Command Personnel, Police Officers and Their Families during Martial Law”, military personnel members who are undergoing inpatient treatment in healthcare institutions or during their leave for treatment after a serious injury apply.

In May 2025, the Commissioner received a complaint from serviceman L., which shows that the applicant received in June 2024 a serious injury related to the defence of the Motherland, in connection with which he had been undergoing treatment for a prolonged period of time. However, since January 2025, the payment of the officer's monthly allowance was stopped, and he did not receive the monthly additional reward of UAH 100,000 at all during the entire period of treatment. Despite the serviceman's appeal to the MoD of Ukraine with complaints, the issue of payment of funds was not resolved, which became the basis for his appeal to the Commissioner.

Taking into account the fact that the above-mentioned actions of the command contradict the requirements of the Resolution of the Government of Ukraine No. 168

of February 28, 2022, the Commissioner sent an inquiry to the MoD of Ukraine with a request to restore the officer's right to receive financial support in the amount specified by law.

Following the results of the consideration of the inquiry, based on the medical documents received, the applicant was included in the order of the commander of the military unit regarding the payment of financial support and additional remuneration to servicemen for the entire period of his treatment.

Item 12 of Section XXXIV of the Procedure for Payment of Cash Benefits to Military Personnel of the Armed Forces of Ukraine, approved by Order of the MoD No. 260 of June 26, 2018, states that the legal ground for issuing an order to pay additional compensation in the amount of up to UAH 100,000 in connection with a wound (concussion, trauma, mutilation) related to the defence of the Motherland is a certificate of the circumstances of the injury (injury, contusion, mutilation) - Appendix 5 to the Regulations on Military Medical Examination in the AFU. In addition, the basis for payment during leave is the conclusion of the MMC on the severity of the wound.

Of particular note are the complaints of servicemen who received serious injuries (concussions, trauma or mutilation) and, according to the conclusions of military medical commissions, require an extension of the terms of stay in healthcare institutions, on sick leave or on leave for treatment after injury, the duration of which exceeds 12 months.

According to Paragraph 1 of Part 11 of Article 10-1 of the Law of Ukraine "On Social and Legal Protection of Military Personnel and Members of Their Families", the total time of continuous stay of military personnel in healthcare institutions and on leave for treatment due to illness or on leave for treatment after injury (concussion, injury or mutilation) with preservation of monetary and material support shall not exceed 12 consecutive months.

After the expiration of the established period of continuous stay for treatment in healthcare institutions and on leave for treatment due to illness or on leave for treatment after injury (concussion, injury or mutilation), military personnel are basically left without means of subsistence.

Appeals to the MoD regarding the need for regulatory solution of the specified issue did not find an adequate response. In response, the Ministry notified the military administration bodies and military units of the requirement to comply with the deadlines specified by law and to promptly submit wounded (sick) servicemen who have completed a 12-month period of continuous treatment for discharge from military service due to health reasons.

That is, instead of showing care for servicemen who lost their health while defending the state, the body in question proposes to transfer the specified category of persons with their problems to local authorities and social security bodies, depriving citizens of proper departmental medical support.

b) Violation of the Right of Servicemen to Medical Care

According to Article 11 of the Law of Ukraine No. 2011-XII, military personnel, conscripts and reservists who are called up for study (or control) and special training are entitled to free medical care in military medical health care institutions.

However, there are complaints from military personnel and their family members about the refusal or non-compliance by commanders / chiefs with the established procedure for sending military personnel for a medical examination by the MMCs (if there are recommendations from health care institutions to that effect), ignoring the conclusions and recommendations of a doctor on the need for inpatient treatment, the rehabilitation of military personnel or the conclusions of the MMCs on granting military personnel leave for treatment by the military command.

In November 2025, citizen B. addressed the Commissioner with a complaint in the interests of her son. It was established from the appeal that the applicant's son filed a complaint against the decision of the military medical commission at the Mukachevo District TRSSC regarding his fitness for military service, and the issue of the need to send the applicant's son for a repeated MMC was raised. At the same time, military officials refused to send the serviceman to undergo an MMC, which became the basis for the appeal to the Commissioner.

At the request of the Commissioner, on December 1, 2025, the command of the military unit to which the applicant's son arrived for service sent this serviceman to undergo a repeated MMC in order to determine his fitness for military service.

Back in 2024, changes had been implemented in the normative regulation of the procedure for providing medical care, aimed at eliminating the causes of a number of complaints with which servicemen appealed to the Commissioner (Order of the MoD of Ukraine No. 262 of April 27, 2024 "On Approval of Amendments to the Regulations on Military Medical Examination in the Armed Forces of Ukraine"). This put an end to the negative practice, when, upon the completion of treatment, a serviceman went to a military unit (often to a combat zone) to receive a referral to undergo a medical examination, with which they subsequently had to visit a medical institution for a medical examination. However, the appeals received by the Commissioner during 2025 indicate that this practice still exists in municipal medical institutions where non-staff MMCs have not been established.

There are also cases when the consideration of a decision of a non-staff MMC on the unfitness of a person for military service due to health conditions, which by law must be issued within 5 days, can last up to several months, and complaints against the MMC decision, the terms of consideration of which are not specified (taking into account the judicial practice, the requirements of the Law of Ukraine "On Citizens' Appeals" are de facto applied) are under consideration by a regular military medical commission for an even longer period of time. At the same time, in case of violations, regular MMCs, mostly do not adopt a new resolution in accordance with the granted powers, but provide recommendations to the unit command to send the applicant for a second MMC. This means that the terms for the restoration of the rights of servicemen illegally called up for military service as a result of a biased MMC decision are delayed for an indefinite period.

This is due to both subjective factors (inaction of the command and members of the MMC), and the workload of full-time MMCs, which have to process a significant number of documents submitted to such commissions for review and approval.

c) Violation of the Rights of Servicemen in Appointment to Positions

345 appeals were received by the Commissioner with a request for assistance in the transfer of servicemen between military units of the types and branches of the AFU in accordance with the provisions of the MMCs' conclusions on the expediency of using servicemen in certain positions, taking into account their health status. In particular, this concerns transfers to military support units, TRSSCs, higher military educational institutions, training centres, institutions (establishments), medical units, logistics, communications, operational support, and security units.

In May 2025, officer N. appealed to the Commissioner with a complaint about the delay by the unit command in implementing the order of the General Staff of the AFU of January 2025 on the transfer of officer N. to another military unit due to health conditions in accordance with the decision of the MMC.

The Commissioner sent a letter to the General Staff of the AFU as a military administration body, charged, in particular, with implementing measures aimed at implementing social and legal guarantees for servicemen, in which it was emphasized that the appeal concerns not only a violation of the rights of a serviceman, but also the failure of the unit command to fulfil a written order received by it from a senior commander, and the requirements of Article 36 of the Statute of the Internal Service of the AFU, according to which the commander (chief) is responsible for the order given, as well as for failure to take measures to fulfil it, were recalled.

A similar letter was sent to the Main Directorate of the Military Law Enforcement Service of the AFU.

As a result of the response measures taken, the transfer order was implemented in June 2025.

The analysis of the complaints received indicates that, despite the measures taken by the Command of the AFU, in particular after the intervention of the Commissioner, to prevent the use of military specialists, particularly medical workers, without taking into account their military rank and field of expertise, the above-mentioned violations remained acute throughout 2025. In a number of cases, this is a consequence of the conscription of citizens into military service during mobilization for a special period by units of the TRSSCs outside the place of residence of those liable for military service on military registration.

Serviceman P. appealed to the Commissioner with a complaint that, despite his military rank of lieutenant colonel (which is confirmed by copies of documents attached to the complaint), he was mobilized and appointed to the position subject to staffing by servicemen belonging to private and sergeant ranks.

The Commissioner sent a letter to the General Staff of the AFU as a military management body, charged, in particular, with implementing measures aimed at implementing social and legal guarantees for servicemen and their family members, with a request to ensure compliance with the serviceman's right to military service in accordance with the complainant's military rank and military service experience. As a result of considering the request, the serviceman was transferred to a position in the same unit that is subject to staffing by officers.

In June 2025, Senior Lieutenant of the Medical Service B. appealed to the Commissioner. According to the applicant, by decision of the command, the number of the positions of the medical unit was reduced and part of the personnel of the medical company was transferred to combat units not corresponding the field of expertise. The officer expressed a desire to serve in another unit according to his existing specialty. Contrary to the relevant order of the General Staff of the AFU, the command of the unit resisted the transfer of the serviceman, which became the reason for the appeal to the Commissioner.

In order to verify the information specified in the appeal and take measures within the scope of competence, the Commissioner sent a letter to the General Staff of the AFU. According to information provided by the Joint Forces Command of the AFU, the order of the General Staff of the AFU on the transfer of the serviceman has been executed.

The socially important topic of the rational duration of personnel stay in areas of combat operations and the frequency of unit rotations still lacks normative regulation.

Excessively long periods of continuous stay of personnel (6 months or more) on the front line in the strongpoints of the first echelon, without the possibility of rotations, as well as prolonged performance of combat and service tasks in areas of combat operations, increase the negative consequences of combat and physical fatigue, cause emotional, psychological and behavioural disorders of servicemen, acute depressive reactions and depressive states, reducing motivation for military service.

The situation is exacerbated by improper organization of medical and other types of support for units performing combat missions, difficulties in organizing and carrying out the evacuation of the wounded.

This causes problems of both a personal nature (consumption of alcohol and energy drinks, increased irritability and inadequate behaviour, etc.), and leads to the AWOL even by servicemen with many years of combat experience.

According to the conclusions of the experts specified in the Advisor for officers and sergeants "Formation of Psychological Readiness of Military Personnel to Perform

Tasks of an Anti-Terrorist Operation", the participation of personnel in combat operations for more than 30-40 days significantly reduces the combat capability of units.

The results of a study conducted prior to the commencement of a full-scale invasion show that the normal period of stay of personnel and units in areas of combat operations shall be 3-4 months (but not more than 6 months), of which no more than 2-3 months shall be in conditions of direct confrontation with the enemy.

In this aspect, a factor that is gaining urgency in society is discrimination against certain categories of military personnel in terms of violation of their right to be released from military service. Mobilized citizens who are continuously on the front line for a long time, unlike contract servicemen, do not understand the terms of their military service.

d) Violation of the Rights of Servicemen to the Discharge from Military Service

Throughout the year, the Commissioner received **731 appeals** in which servicemen reported the lack of response from the command of military units to reports on discharge from military service due to health reasons (due to the recognition of a serviceman by the MMC as unfit for military service or the assignment of a disability category), as well as due to family circumstances, in accordance with Part 12 of Article 26 of the Law of Ukraine "On Military Duty and Military Service". In particular, this is due to the lengthy consideration of submitted reports, unlawful requirements to attach documents not provided for by law to the report, demands for unspecified document samples, etc.

In June 2025, the Commissioner was contacted by citizen K., who was declared unfit for military service by the decision of the hospital MMC of the psychoneurological profile of March 26, 2025, approved by the Central MMC on March 31, 2025. According to the applicant, in May 2025, the documents for the discharge from military service were sent to the commander of the military unit for implementation.

Despite the fact that the conclusion of the MMC regarding the serviceman was final (approved by the Central MMC of the AFU), the decision on his discharge from military service was not made within the time limits specified by law, which was the ground for the appeal to the Commissioner.

After the Commissioner's appeal to the General Staff of the AFU and the General Directorate of the Military Law Enforcement Service in the AFU, in which attention was drawn to the content of the Regulation on Military Medical Examination in the Armed Forces of Ukraine, approved by the Order of the MoD of Ukraine No. 402 of August 14, 2008, according to which the resolutions of the MMC regarding military personnel who are recognized as unfit for military service must be implemented immediately. After being recognized as unfit for military service by the MMC, serviceman K. was immediately discharged from military service.

In connection with numerous appeals from citizens regarding the differences in the forms of conclusions on the need of a person for constant external care in the MoH and the MoD, the Prime Minister of Ukraine, at the initiative of the Commissioner, instructed the MoH to provide relevant clarifications.

The MoH sent a letter to the MoD with clarifications on the forms of documents confirming the need of a person for constant external care. Later, by resolution of the Deputy Minister of Defence of Ukraine, the clarifications were sent to the structural units of the MoH, the General Staff of the AFU and other military command bodies. However, throughout the year there were complaints against the command of military units that refused to release from military service for family reasons, not recognizing the certificate issued by the healthcare institution in form No. 080-4/o (defined by the Order of the MoH No. 407 of March 9, 2021 "On Approval of the Forms of Primary Accounting Documentation and Instructions for their Completion for Use in Healthcare Institutions"), which confirms the person's need for external care. Only following the intervention of the Commissioner and the involvement of the General Staff of the AFU and the Military Law Enforcement Service in the AFU was the right of the applicants to be released from service realized.

On June 26, 2025, the Commissioner was addressed by citizen V., whose mother is a person with a disability of Category II, and according to the Medical Advisory Commission certificate (Φ-080-4/o) requires external care. In this regard, the serviceman submitted a report on dismissal from military service for family reasons, which was refused by the unit command, citing the fact that, in the opinion of the military unit commander, the specified Medical Advisory Commission certificate does not confirm the fact of the serviceman's mother's need for constant external care.

After the Commissioner's appeal to the General Staff of the AFU and the General Directorate of the Military Law Enforcement Service in the AFU, in which attention was drawn to the content of the MOH's clarification on the forms of documents confirming the need for constant external care, and the resolution of the Deputy Minister of Defence on this matter, V. was dismissed from military service for family reasons in August 2025.

The Commissioner has repeatedly raised the issue of transparency of the procedure for discharge from military service with the Ministry of Defence. The Order of the MoD "On Approval of Amendments to the Instruction on Organizing the Implementation of the Regulations on the Completion of Military Service by Citizens of Ukraine in the Armed Forces of Ukraine" of July 23, 2024 No. 495 amended Appendix No. 19 of the Instruction on Organizing the Implementation of the Regulations on the Completion of Military Service by Citizens of Ukraine in the Armed Forces of Ukraine, approved by the Order of the Minister of Defence of Ukraine of April 10, 2009 No. 170, and defined a clear list of documents required for making a decision on discharge from military service due to family circumstances.

At the same time, the analysis of the received appeals shows that, despite the changes made, there are still cases when the unit command requires military personnel to provide documents not established by the said Instruction to confirm the right to discharge.

3.1. Respect for the Rights of Veterans, Family Members of Fallen (Deceased) War Veterans, and Defenders of Ukraine

The basic regulatory legal act, which contains norms related to the determination of the respective statuses and contains a list of benefits and social guarantees for war veterans, members of their families, families of fallen (deceased) war veterans, Defenders of Ukraine, is currently the Law of Ukraine "On the Status of War Veterans, Guarantees of Their Social Protection", adopted back in 1993. A significant number of changes have been made to the text of this Law of Ukraine over the past 30 years, which actually increased the scope of persons equated to war veterans.

Some of the benefits and social guarantees defined by this Law have become purely decorative over time—for example, the entitlement to priority installation of a landline telephone.

Following the start of the War for Independence in 2014, the situation did not change cardinally. Even the establishment of the Ministry of Veterans Affairs of Ukraine in 2018 did not lead to significant updates to the specialized Law, which already required substantial modernization at that time.

The beginning of the full-scale invasion in 2022 further highlighted the need for a fundamental review of veteran policy principles - a point the Commissioner has repeatedly emphasized to the Government of Ukraine.

In early 2025, following the active involvement of the Commissioner's Secretariat in the relevant working group of the Parliamentary Committee on Social Policy and Protection of Veterans' Rights, Parliament adopted amendments to the Law of Ukraine "On the Principles of Domestic and Foreign Policy", establishing veteran policy as one of the priority areas of the state's domestic policy.

Additionally, in 2025, the Government approved the Veteran Policy Strategy for the period until 2030 and ratified an operational action plan for its implementation in 2024–2027.

One of the key points of this operational plan is the modernization of the current regulatory framework governing veteran policy in the state.

The draft "Code of Ukraine on the Protection of Statehood, Independence, and the Status of Defenders of the State", which aims to define a holistic state system for supporting war veterans and their families, was submitted to the Parliament by the Ministry of Veterans Affairs only at the end of 2025. Based on the review of the document, the Commissioner provided substantial comments and reservations regarding the text of the bill.

Currently, a working group has been established under the Parliamentary Committee on Social Policy and Protection of Veterans' Rights to refine an alternative draft of the Code, with the active participation of the Commissioner's Secretariat.

The fragmentation of legal regulation across various laws, bylaws, and departmental orders complicates both the exercise of rights by war veterans and their

families and the fulfilment of duties by state and local government authorities in this sphere.

While the Ministry of Veterans Affairs has declared the implementation of strategic veteran policy directions at the state level, activities at the local level remain largely focused on providing one-time financial aid, organizing burials, and ensuring a minimum of social services. Local authorities effectively overlook long-term reintegration programs, as well as housing and transport initiatives. Consequently, in numerous communities, the support mechanisms for war veterans, their families, and the families of fallen (deceased) Defenders are implemented selectively or remain declarative due to chronic underfunding, a lack of trained personnel, and the absence of unified service standards.

Educational programs for veterans at the local level are either underdeveloped or suffer from low awareness, despite being designated a state priority. Veteran spaces and support for veteran associations also remain insufficient in most regions, even though they are identified as vital integration tools in national policy.

Furthermore, various ministries have established institutions that provide support but simultaneously duplicate functions. This often disorients the veteran community when seeking appropriate assistance.

In particular, to support the readaptation and reintegration of veterans and demobilized persons, Ministry of Veterans Affairs introduced within territorial communities the profession of "Expert in Supporting War Veterans and Demobilized Persons". The relevant professional standard was approved by the Order of the Ministry of Veterans Affairs No. 835 of October 10, 2025.

According to the Procedure approved by the Government Resolution No. 881 of August 2, 2024, these experts carry out activities by providing comprehensive assistance in various areas, including assistance in organizational resolution of issues, provision of legal, social, psychological assistance, public (electronic public), social, medical, rehabilitation, educational and other services, assistance in drawing up documents on housing, employment issues, in particular obtaining grant support for the development of entrepreneurial initiatives, assistance in participation in sports competitions, in implementing physical culture and sports rehabilitation measures. At the same time, in accordance with the Procedure, support measures are provided primarily to persons with disabilities as a result of the war.

At the same time, as the results of the analysis of appeals to the Commissioner and monitoring of compliance with constitutional rights and freedoms in the implementation of veterans' policy in the regions showed, support experts often lack the proper level of professional training, complain about insufficient support from the Ministry of Veterans in the field of acquiring relevant knowledge to fulfil their professional duties and the lack of a clear job description, as well as the inability to effectively interact with officials of bodies involved in the implementation of veterans' policy "on the spot".

At the time of the submission of the Ministry of Veterans, only two joint orders had been approved, which regulate the procedures for interaction of support specialists with officials of other ministries and departments (the relevant provisions of the Government Resolution No. 881 of August 2, 2024 provide for the approval of eleven such orders, in particular with the MIA, MoD, MoH, Pension Fund of Ukraine, etc.)

According to Paragraph 15 of the Procedure for Ensuring the Activities of Specialists in Supporting War Veterans and Demobilized Persons (Government Resolution No. 881 of August 2, 2024), a support expert shall interact with authorized bodies to ensure the implementation of support measures in accordance with an algorithm for interaction with authorized bodies. Such algorithms are determined by joint orders of the Ministry of Veterans and the Ministry of Social Policy, the Ministry of Defence, the Ministry of Education and Science, the Ministry of Youth and Sports, the MoH, the MIA, the Administration of the State Service of Ukraine for Special Communications and Information Protection, the SSU, the Foreign Intelligence Service, and the State Security Administration, which began to be developed by the Ministry of Veterans since September 2025.

However, these processes are developing rather slowly, since some of the draft joint orders sent by the Ministry of Veterans Affairs for approval to the Commissioner required significant revision and observations were made to those texts.

In 2025, only the relevant joint order of the Ministry of Veterans Affairs and the Ministry of Social Policy, Family and Unity of Ukraine No. 847/527-H of October 20, 2025 was approved. The approval of such joint orders will allow to properly regulate the interaction of support specialists with officials of bodies involved in the implementation of veteran policy.

Currently, the issue of accelerating the preparation of the aforementioned joint orders by the Ministry of Veterans Affairs is under the control of the Commissioner.

In fact, the implementation of a holistic system of support for the veteran community, which is one of the main tasks of the Ministry of Veterans Affairs of Ukraine, foresees that the latter must ensure coordination of the actions of central and local executive bodies, local self-government, public organizations and international donors. Only a systematic approach to identifying the needs of representatives of the veteran community will allow developing mechanisms for effective support in the form of long-term state programs and ending the current practice of providing fragmented assistance in the format of short-term experimental projects.

However, currently, the Ministry of Veterans Affairs, despite the defined role of the main body in the relevant field, limits itself in most cases to informational and advisory activities, and the implementation of state policy is basically reduced to the implementation of individual programs and projects that do not fully provide appropriate systemic support for representatives of the veteran community. This situation leads to violations of the rights of the relevant categories of citizens of Ukraine, primarily the families of fallen (deceased) war veterans, Defenders of Ukraine.

Accordingly, during 2025, the number of appeals to the Commissioner from war veterans and their family members increased. In 2024, 1,033 appeals were received regarding violations of rights in the veterans' sphere, and in 2025, the Commissioner received **2,077 appeals** of this kind.

a) Violation of Rights of Family Members of Fallen (Deceased) War Veterans and Deceased Defenders of Ukraine

In 2025, the Commissioner received **665 appeals** from families of deceased defenders of Ukraine with complaints about violations of the deadlines for the

appointment and payment of a one-time financial assistance (hereinafter referred to as the OFA) for a deceased serviceman.

In accordance with Paragraph 1.10. of the Order of the MoD No. 45 of January 21, 2023 "On Approval of the Procedure and Conditions for the Appointment and Payment of a One-Time Financial Assistance in the Event of the Death of Servicemen of the Armed Forces of Ukraine During the Period of Martial Law": the assigned OFA amount (UAH 15 million) in the MoD of Ukraine is paid in stages:

at the first stage - 1/5 of the assigned amount of the OFA (UAH 3 million);

the remaining balance (4/5, or UAH 12 million) is paid in monthly instalments over the following 80 months. This is equivalent to UAH 150,000 per month, intended to provide sustained financial support to the families.

To receive the OFA, family members must apply to a regional or city TRSSC and submit the required documentation. The final decision is made by the relevant Commission of the MoD. However, the involvement of multiple administrative layers—from units collecting documents to commissions making final decisions—often results in procedural bottlenecks, as evidenced by the complaints received by the Commissioner.

Families of fallen (deceased) Defenders frequently report delays of up to six months by military units in providing the necessary document packages. Furthermore, TRSSC officials do not always adequately inform the families of fallen (deceased) Defenders about their rights or the specific procedures for the appointment and payment of the OFA.

In January 2025, citizen P. appealed to the Commissioner for assistance in the appointment of the OFA, in accordance with the Resolution of the Government of Ukraine No. 168 of February 28, 2022, for her son, who died while defending the Motherland.

The applicant complained that for six months the military unit where her son served had been delaying the provision of the necessary documents to the TRSSC, to which citizen P. had applied back in June 2024.

As a result of the Commissioner's response measures, the military unit sent the necessary documents to the TRSSC, and in July 2025, the MoD Commission responsible for consideration of issues related to the appointment and payment of one-time financial assistance and compensation amounts made a decision to appoint citizen P. a military pension for her deceased son in the amount of UAH 15 million.

During working meetings with officials of the MoD and the General Staff of the AFU, employees of the Secretariat of the Commissioner repeatedly emphasized the need to ensure control over the timely provision of packages of documents to the TRSSCs by military units.

Another aspect of the violation of the rights of the families of deceased servicemen in 2025 was the problem of citizens receiving OFA due to the expiration of the deadlines for enjoying such a right. Here, family members of deceased servicemen who were considered missing for a long time, and whose bodies were later identified based on the results of forensic molecular genetic examination of samples of biological material (DNA

examination) are meant. Citizens complained about the inability to exercise the right to receive OFA due to the existing procedure for calculating the deadline (three years) for exercising such a right.

Responding to the appeal of this category of citizens, the Commissioner appealed to the MoD of Ukraine with the initiative to change the approach to determining the date of the onset of the right to payment of OFA to members of the above-mentioned families of military personnel.

At the request of the MoD, the Government approved the Resolution No. 631 of May 30, 2025 "On Amendments to the Resolutions of the Government of Ukraine No. 975 of December 25, 2013 and No. 168 of February 28, 2022", according to which the three-year period for exercising the right to the appointment of OFA is calculated from the date of drawing up the death certificate, which is indicated in the death certificate of the serviceman, and not from the date of death, as was determined in the previous version of the aforementioned regulatory legal acts of the Government of Ukraine.

The Commissioner received appeals from family members of missing servicemen who were recognized as deceased in court and whose bodies were not repatriated. The questions in the appeals concerned the need to provide a document confirming the connection between the death of a serviceman and the defence of the Motherland (Item 3 of the Procedure for Issuing Certificates to Family Members of Servicemen Who Died or Went Missing While Performing Military Service, approved by the Resolution of the Government of Ukraine No. 379 of May 28, 1993).

For many families, such a requirement is incomprehensible and creates additional psychological stress, since obtaining a document requires an examination of the body, which is missing. At the same time, employees of the TRSSCS do not provide family members with appropriate explanations.

In addition, the requirement in the described case to provide the military medical commission with documents confirming the connection between the death of a serviceman and the defence of the Motherland creates an additional burden on the MMCs.

Given the relevance and importance of the issue of respecting the rights of the above-mentioned category of persons, a letter was sent to the MoD to consider the issue of amending the Procedure for Issuing Certificates to Family Members of Servicemen Who Died or Went Missing While Performing Military Service, regarding the exclusion from the list of required documents of the resolution of an MMC in the event that a missing serviceman is recognized by a court order as deceased and whose body has not been repatriated.

Based on the results of the response of the Commissioner of the Ministry of Defence, a corresponding draft resolution of the Government of Ukraine "On Amendments to Item 3 of the Procedure for Issuing Certificates to Family Members of Servicemen Who Died or Went Missing While Performing Military Service" was prepared. The executive bodies are currently approving the draft Government Resolution.

2025 also showed another side of the issues faced by family members of military personnel - war veterans who died from wounds or as a result of trauma (i.e. did not die during hostilities). Complaints concerned officials of local government bodies due to their refusal to honour the memory of such military personnel and to indicate information about them in places of remembrance (Alleys of Glory, memorials) organized in settlements. It

is argued that the military personnel did not die during hostilities (non-combat loss), despite the deceased having the status of a war veteran.

According to the Regulation on the Ministry of Veterans Affairs, approved by the Resolution of the Government of Ukraine No. 1175 of December 27, 2018 "Certain Issues of the Ministry of Veterans Affairs" (as amended), the body, in accordance with the tasks assigned to it, shall, in particular, coordinate the implementation of relevant measures by executive authorities and, in cases provided for by law, local self-government bodies on issues within its competence.

In course of the events of the Commissioner's Secretariat, aimed at discussing problematic issues of the veteran community, the issue of standardizing and unifying approaches to honouring the memory of the fallen Defenders of Ukraine in the regions was repeatedly raised with the Ministry of Veterans Affairs. As a result, the Ministry of Veterans Affairs prepared a corresponding draft and the Government approved the Concept of Honouring the Memory of the Fallen Defenders of Ukraine and Forming a Culture of Respect and Support for War Veterans by 2028. According to the operational plan of measures for the implementation of the Concept, the task of ensuring legal and organizational regulation of issues related to commemorating the fallen Defenders of Ukraine and supporting war veterans, in particular through improving the regulatory framework, shall be assigned to the Ministry of Veterans Affairs.

b) Violation of the Rights of Veterans - Participants of Hostilities

During the monitoring of legislation regarding the social protection of war veterans, a conflict was identified between the provisions of Law of Ukraine No. 3551-XII and Law of Ukraine No. 1105-XIV "On General Mandatory State Social Insurance" (hereinafter referred to as the Law of Ukraine No. 1105-XIV). This conflict concerns the payment of temporary disability benefits (sick leave) to employed participants of hostilities and persons with disabilities as a result of war.

The provisions of the Law of Ukraine No. 3551-XII provide for the payment of temporary disability benefits to employed participants in hostilities and persons with disabilities as a result of the war in the amount of 100 percent of the average salary, regardless of the length of service.

Law of Ukraine No. 1105-XIV, however, states that temporary disability benefits are not provided in the amount of 100 percent of the average salary (income) to war veterans under certain conditions (in particular, if the insurance coverage period is less than six months).

That is, insured persons who have long been unemployed, or are just starting to work (and have not acquired six months of insurance coverage period in the twelve-month period before the insured event occurs), are entitled to temporary disability benefits in limited amounts.

Citizen H., who is a person with a disability as a result of the war, appealed to the Commissioner regarding the employer's refusal to pay temporary disability benefits to a person with a disability as a result of the war in the amount of 100 percent of the average salary, as provided for in Paragraph 15 of Article 13 of the Law of Ukraine "On the Status of War Veterans, Guarantees of Their Social Protection".

Currently, Article 12 of the Law of Ukraine "On General Mandatory State Social Insurance" establishes restrictions on the payment of temporary disability benefits to war veterans who have not acquired six months of insurance coverage period before the insured event occurred.

Upon H.'s appeal, the Commissioner's proceedings were initiated. As part of the response, relevant requests were sent to the Ministry of Veterans Affairs of Ukraine and the Ministry of Social Policy, Family and Unity of Ukraine.

*Also, the V.M. Koretskyi Institute of State and Law of the National Academy of Sciences of Ukraine provided a conclusion, which stated that the restrictions on the amount of temporary disability benefits do not apply to war veterans, and the norms of the Law of Ukraine No. 3551-XII (as of the *lex specialis*) shall be subject to application. That is, temporary disability benefits should be paid in the amount of 100 percent of the average salary, regardless of the length of work.*

Work to restore the rights of a citizen within the framework of the proceeding continues.

At the initiative of the Commissioner, the Government has developed a draft Law of Ukraine "On Amendments to the Law of Ukraine "On General Mandatory State Social Insurance" to Strengthen Social Protection of Certain Categories of Insured Persons". The draft law provides for granting persons who have the status of a participant in hostilities and/or the status of a person with a disability as a result of the war the right to receive benefits for temporary disability, pregnancy and childbirth in the amount of 100 percent of the average wage (income) without any restrictions. The relevant coordination procedures regarding the said draft law are currently underway.

c) Violation of the Rights of Veterans with Disabilities as a Result of War

The issue of the quality of the work of expert teams for the assessment of daily functioning of a person regarding the examination of war veterans and the exclusion of violations of their rights when establishing disability was in the field of view of the Commissioner in 2025.

Veterans - participants of hostilities, who received a referral for examination by expert teams for the assessment of daily functioning of a person, complained about the delay in the procedure for establishing disability, which makes it impossible to issue relevant benefits and compensations. The facts of the delay in the assessment procedure conduct and the lack of effective tools for promptly appealing the decisions of expert teams lead to violations of the rights of the mentioned category of citizens in the field of health care.

In addition, the long wait for decisions of expert teams in cases regarding the establishment of disability negatively affects the psycho-emotional state of war veterans, complicates the process of rehabilitation and social adaptation, and in some cases can lead to a deterioration in health.

Citizen H., who was seriously injured during hostilities, appealed to the Commissioner regarding the lengthy consideration of the issue of establishing his disability category.

Analysis of the received complaint confirmed that the unjustified delay in the procedure for establishing a disability category by the Centre for Assessment of the Functional State of a Person of the Public Institution “Ukrainian State Research Institute of Medical and Social Problems of Disability of the Ministry of Health of Ukraine” (hereinafter referred to as the Centre) made it impossible for the applicant to exercise his rights to obtain a certificate of a person with a disability as a result of the war, to be granted a disability pension and to enjoy social benefits and guarantees provided for by law.

The Commissioner’s Secretariat sent relevant requests to the management of the Centre.

Thanks to the measures taken by the Commissioner, the Centre provided an appropriate conclusion of the expert team regarding the establishment of a disability category for citizen H., which allowed to obtain an appropriate certificate, pension and to enjoy the benefits and social guarantees specified by law.

Since April 12, 2023, based on the Decision of the Constitutional Court of Ukraine No. 7-p (II)/2022 of October 12, 2022 in case No. 3-102/2021, pensions awarded to war veterans who defended the sovereignty, territorial integrity and inviolability of Ukraine during the Russian war against Ukraine that began in February 2014, which are awarded from the above date, are not limited to the maximum amount (ten subsistence minimums established for persons who have lost the ability to work).

Article 46 of the Law of Ukraine "On the State Budget of Ukraine for 2025" and Paragraph 1 of the Resolution of the Government of Ukraine No. 1 of January 3, 2025 "On Determining the Procedure for Paying Pensions to Certain Categories of Persons in 2025 During the Period of Martial Law" established that in 2025 during the period of martial law, pensions assigned (transferred), in particular, in accordance with the Law of Ukraine “On the Provision of Pension to Persons Discharged from Military Service and Certain Other Persons”, the amount of which exceeds ten subsistence minimums established for persons who have lost the ability to work, shall be paid with the application of coefficients to the amount of excess in the amounts and procedure determined by the Government of Ukraine.

Item 2 of the Resolution of the Government of Ukraine No. 1 of January 3, 2025 stipulates that, during the period of martial law in 2025, reducing coefficients to pensions shall not be applied to war veterans who defended Ukraine starting from February 2014.

However, in 2025, the Commissioner received 27 appeals from war veterans who have the status of participants in hostilities, and whose pensions were assigned after April 12, 2023, with complaints about the application by the territorial bodies of the Pension Fund of Ukraine to their pensions of reducing coefficients stipulated by the Resolution of the Government of Ukraine No. 1 of January 3, 2025, which is a violation of the requirements of current legislation.

In December 2025, a citizen P. who had participated in hostilities appealed to the Commissioner regarding the application of reducing coefficients by the territorial body of the Pension Fund to his pension in accordance with the Resolution of the Government of Ukraine No. 1 of January 3, 2025.

Within the Commissioner's response actions, a relevant request was sent to the Pension Fund of Ukraine, following the results of which, with account to the information received by the Pension Fund within the information interaction with the Ministry of Veterans Affairs, in December 2025, the pension payment to citizen P. was restored in full and the unpaid part of the pension unjustifiably withheld by the territorial body of the Pension Fund was ensured.

Among other pressing issues that war veterans, primarily persons with disabilities as a result of the war, face today is the housing issue. According to Point 18 of Article 13 of the Law of Ukraine No. 3551-XII, persons with disabilities as a result of the war who need improved housing conditions shall enjoy benefits in the form of priority housing provision for two years from the date of registration.

Citizen A., who has the status of a person with a disability as a result of war (war veteran), applied to the Commissioner for assistance in exercising the right to housing. The war veteran had been on the housing register for over 20 years, including on the priority waiting list. As of the date of the appeal, the citizen's housing needs remained unmet.

In response to an appeal to the Main Directorate of the National Guard of Ukraine, citizen A. received a response that the issue of providing him with housing would be considered if the military unit received residential space according to the list.

In a letter to the Commander of the Main Directorate of the National Guard of Ukraine, the Commissioner requested to verify the legal grounds for ensuring the needs of citizen A. and to take appropriate measures to provide the applicant with housing or pay him monetary compensation for the housing he was entitled to receive.

As a result of the measures taken, A., a person with a disability as a result of the war, was provided with a one-room apartment for permanent residence, and his name was subsequently removed from the housing register.

RECOMMENDATIONS:

To the Cabinet of Ministers of Ukraine:

to ensure the development and submission to the Verkhovna Rada of Ukraine in accordance with the established procedure of a draft amendment to Article 10-1 of the

Law of Ukraine "On Social and Legal Protection of Servicemen and Members of Their Families", providing for the possibility of maintaining monetary and material support for servicemen who, by decision of an MMC, are in healthcare institutions and on leave for treatment due to illness or on leave for treatment after injury (concussion, trauma or mutilation) for more than 12 consecutive months;

to ensure the development and submission to the Parliament of Ukraine in accordance with the established procedure of a draft amendment to Article 26 of the Law of Ukraine "On Military Duty and Military Service" regarding the grounds for dismissal from military service in case of unlawful mobilization;

to develop a draft amendment to the Law of Ukraine "On Alternative (Non-Military) Service", providing for the possibility of involving a certain category of citizens during martial law to perform tasks related to the construction of fortifications, evacuation and care for the wounded, replacement of rear positions in military units, work at defence enterprises, etc.;

to implement the operational plan of measures for the implementation of the Veteran Policy Strategy for the Period until 2030, to ensure the development of the current regulatory and legal framework that regulates the implementation of veteran policy in the state, with the aim of its modernization and improvement;

to ensure the development and submission to the Parliament of Ukraine, in accordance with the established procedure, of the draft Law of Ukraine "On Amendments to the Law of Ukraine "On General Mandatory State Social Insurance" Regarding Strengthening Social Protection of Certain Categories of Insured Persons".

To the Ministry of Defence of Ukraine:

to ensure that the collection points are brought into full compliance with the requirements of the Resolution of the Government of Ukraine No. 560 and stop the practice of illegal restrictions on the freedom of citizens on the grounds of the TRSSCs;

to develop and implement an administrative act on the issues of streamlining military registration and entering up-to-date information into the Unified State Register of Conscripts, Military Conscripts and Reservists regarding military conscripts and reservists remaining in the reserve of the SSU and intelligence agencies;

to ensure that the TRSSCs are staffed with employees who have proper training for communicating with civilians, to organize their psychological testing and training on a regular basis;

to provide the TRSSCs with technical devices that have photo and video recording functions and devices with the function of scanning information from military registration documents in electronic form in order to avoid violations of citizens' rights and their unjustified delivery to the TRSSCs;

to develop an administrative act on the prohibition of the use of face masking devices by alert groups composed of employees of the TRSSCs, removal of identification marks from military uniforms and other actions aimed at violating the rights of citizens;

to ensure the implementation of quarterly inspections of compliance by the MMCs with the specified deadlines when approving decisions of non-staff MMCs and

complaints about such decisions; if necessary, consider the issue of increasing the number and expansion of MMC staff;

to work out the issue of amending the Order of the MoD No. 45 of January 21, 2023 "On Approval of the Procedure and Conditions for the Appointment and Payment of a One-Time Financial Assistance in the Event of the Death of Servicemen of the Armed Forces of Ukraine During the Period of Martial Law" regarding the establishment of the appropriate period during which the command of the military unit must provide the necessary documents at the request of the TRSSCs;

to determine the maximum periods of stay of servicemen in combat areas and ensure the rotation of units;

together with the General Staff of the AFU, the Command of the AFU, within the scope of competence, to ensure compliance by commanders of military units and military command bodies with the requirements of departmental regulations regulating the issue of dismissal of servicemen from military service due to family circumstances and health conditions.

To the General Staff of the Armed Forces of Ukraine:

to ensure, together with the Command of the AFU, within the scope of competence, compliance by commanders of military units and military command bodies with the recommendations of the MMCs and healthcare institutions regarding sending subordinate servicemen for a medical examination by the MMCs, in order to determine the degree of their fitness for military service.

To the Main Directorate of the Military Law Enforcement Service of the Armed Forces of Ukraine:

to ensure control over the command's compliance with the requirements of orders and instructions of the military command, which regulate the issue of releasing servicemen from military service. In case of non-compliance with the latter - to take measures within the scope of competence to bring the commanders guilty of failure to comply with these requirements to legal liability.

To the Ministry of Veterans Affairs of Ukraine:

to approve joint orders of the Ministry of Veterans Affairs and the MoD of Ukraine, the Ministry of Education and Science of Ukraine, the Ministry of Youth and Sports of Ukraine, the MoH, the MIA, the Administration of the State Special Communications and Information Protection Service of Ukraine, the SSU, the Foreign Intelligence Service of Ukraine and other agencies involved in the implementation of veterans' policy, which regulate certain procedures for the interaction of specialists in the support of veterans and demobilized persons with the relevant support services and officials of the specified bodies and agencies;

to develop and approve methodological recommendations on the standardization and application of a unified approach to honouring the memory of the fallen Defenders of Ukraine;

to comprehensively work out the issue of determining ways to resolve the problem of non-compliance with the norms of the legislation of Ukraine regarding extraordinary housing provision within two years from the date of registration of persons with disabilities as a result of the war, in particular within the framework of working out the draft Veterans Code.

To the Ministry of Health of Ukraine:

to conduct a comprehensive audit of compliance by the Centre for Assessment of the Functional State of a Person of the Public Institution "Ukrainian State Research Institute of Medical and Social Problems of Disability" with the deadlines for considering documents on establishing disability and appealing decisions of expert teams, with a special emphasis on the cases of active military personnel and persons discharged from military service who have the status of a participant in hostilities;

to develop and proscribe the deadlines for considering documents in cases on establishing disability, in particular for participants in hostilities and persons discharged from military service;

to develop and implement a priority procedure for assessing daily functioning for participants in hostilities, as well as a mechanism for constant monitoring of the deadlines for considering cases by expert teams with the provision of personal responsibility of officials for unreasonable delays;

to provide effective mechanisms for informing applicants about the progress and deadlines for considering their cases, as well as the possibility of prompt administrative appeal against the inaction of the Centre for Assessment of the Functional State of a Person of the Public Institution "Ukrainian State Research Institute of Medical and Social Problems of Disability".

To the Ministry of Social Policy, Family and Unity of Ukraine:

to develop and implement, together with the PFU, a mechanism for proper control over preventing unjustified reductions by territorial bodies of the PFU of the amount of pensions awarded to war veterans, starting from April 12, 2023.

4. RIGHTS OF THE CHILD

Number of appeals	3 426
Number of proceedings	673
Number of renewed rights upon appeals (individual and collective)	14 927
Number of developed draft regulatory legal acts	231
Number of monitoring (on-site and off-site)	936
Number of response acts of the Commissioner (submissions)	57

4.1. Rights of the Child under the Legal Regime of Martial Law

The aggression against Ukraine, which has been ongoing since 2014, has caused a significant impact on the entire population of Ukraine. However, children, due to their age and the need for care from adults or the state, are in a particularly vulnerable state. This places additional obligations and responsibilities on Ukraine, as well as on the Russian Federation (hereinafter referred to as Russia / the aggressor state), to ensure the rights of the child, guarantee their safety, preserve families (non-separation), protect against recruitment and use in armed conflicts, and preserve the Ukrainian identity of children. In addition to the fundamental rights of the child, international humanitarian law provides special protection for children in armed conflict - exceptional respect and protection from any kind of indecent assault. The parties to the conflict must provide the protection and assistance that children require for any reason.

Special rules also concern the evacuation of children (in particular, the allocation of a single basis for the movement of children within and/or beyond the territory occupied by the aggressor state to a foreign state, which are urgent reasons related to the health or treatment of children), care for them with account to religion, cultural traditions, language and nationality, identification of children and registration of their family ties, as well as the provision of guarantees for family reunification and repatriation to the country of origin.

It is worth noting separately that since the fall of 2025, the aggressor state has increased the intensity and frequency of shelling of energy infrastructure facilities in Ukraine, which has significantly affected the life of communities and the operation of critical and social infrastructure facilities - heat and water supply enterprises, preschool and secondary education institutions, hospitals, urban electric transport enterprises, etc.

This has a disproportionate negative impact on children's health, both physical and mental. In particular, the 43rd report of the UN Human Rights Monitoring Mission in Ukraine noted that Russian attacks caused regional emergency power outages and long-term planned outages throughout the country (reaching 10-18 hours daily), and in some areas the heating and water supply systems were disrupted. In certain areas, emergency outages lasted for more than 36 hours following after the attacks. Compared to previous periods, attacks during the reporting period were also more often directed at natural gas infrastructure, which led to disruption of the population's access to domestic gas for cooking or heating (Report of the UN Monitoring Mission on Human Rights in Ukraine on the situation of human rights in Ukraine from June 1, 2025 to November 30, 2025).

In November 2025, Russia carried out five large-scale coordinated attacks on energy infrastructure in various regions of Ukraine. The continuation of such attacks led to prolonged daily power outages across the country. This disrupted access to electricity, heating and water supply to residential buildings as temperatures dropped.

4.1.1. Return of Children from Deportation, Forcible Displacement and Temporarily Occupied Territories of Ukraine

As of the end of 2025, nearly 19.25 percent of the territory of Ukraine remains occupied by the aggressor state. From there, thousands of children were deported, forcibly displaced, while nearly 1.6 million, as of the beginning of 2022, remained in the temporarily occupied territories (hereinafter referred to as the TOTs) at the risk of deportation/forcible displacement, under the influence of militarization and indoctrination, which are part of the Russian Federation's systemic policy of erasing the identity of Ukrainian children. At the same time, public statements by representatives of the Russian Federation authorities in 2022 indicated that more than 744 thousand Ukrainian children were taken from the TOTs to the territory of the Russian Federation. Therefore, a separate priority task for Ukraine and partners remains the return and reintegration of all Ukrainian children.

It is worth noting separately that on October 17, 2025, the ICRC published an updated commentary to the Geneva Convention (IV) relative to the Protection of Civilian Persons in Time of War, which is particularly relevant in the context of the qualification of the actions of the aggressor state described above. Article 49 of the Geneva Convention (IV) relative to the Protection of Civilian Persons in Time of War prohibits deportation and forcible transfer of civilians, as well as changes in the demographic composition of the population in occupied territory. The new ICRC Commentary to this article explicitly states that evacuation may be considered deportation if the State that carried it out does not take active measures to return the evacuees. The Commentary also provides for a number of mandatory actions, namely: organizing the return of civilians in dignified conditions, ensuring the safety of such return, as well as assessing the needs of the evacuees, taking into account their state of health, age and gender. Following this interpretation, all cases of removal of Ukrainian children to the territory of the Russian

Federation have the characteristics of deportation, in particular due to the lack of effective measures by the Russian Federation for their return.

The official commentary also explains the obligations of States parties to an international armed conflict regarding civilians during the occupation regime. In this context, the requirements of Article 50 IV of the Geneva Convention (IV) relative to the Protection of Civilian Persons in Time of War regarding the protection of children are of paramount importance in the form of obligations of the occupying power: to facilitate the proper working of all institutions devoted to the care and education of children; to facilitate the identification of children and the registration of their parentage without the right to change their personal status and without enlisting the children in formations or organizations subordinate to the occupying power; to make arrangements, should the local institutions be inadequate for the purpose, for the maintenance and education, if possible by persons of their own nationality, language and religion, of children who are orphaned or separated from their parents as a result of the war.

Summarizing the above, it can be stated that any movements of children, including humanitarian ones, such as the so-called "evacuation", can be considered forced and be qualified as war crimes under certain conditions. This position is reflected in the conclusions of the report of the UN Independent International Commission of Inquiry, which was presented within the 61st session of the UN Human Rights Council. The Commission concluded that the Russian Federation is forcibly transferring Ukrainian children to the TOTs and/or unlawfully deporting them from the temporarily occupied territories of Ukraine to Russia under the guise of "evacuation". At the same time, such transfers are not temporary in nature and are carried out without the consent of the parents, which does not meet the requirements of the Geneva Convention (IV) relative to the Protection of Civilian Persons in Time of War. The report also emphasizes that Russia continues to deviate from its obligations under international humanitarian law to take all possible measures to reunite families who have been separated in connection with the armed conflict, which is defined as an unjustified delay in the repatriation of civilians and should be qualified as a war crime.

Representatives of Russia systematically deny and do not provide access to the civilian population living in the TOTs of Ukraine to representatives of international governmental and non-governmental organizations, as well as the representatives of civil society. This deprives not only the possibility of monitoring compliance with human rights in the TOTs of Ukraine, but also access to the civilian population to provide assistance to those at risk.

In view of the above, it is impossible to accurately record the number of violations of children's rights in the Autonomous Republic of Crimea and the city of Sevastopol, the TOTs of Donetsk, Zaporizhzhia, Luhansk, Kherson regions, and other territories not controlled by the government of Ukraine, and to conduct objective monitoring of compliance with their rights.

However, in order to identify possible facts of violation of children's rights in the TOTs of Ukraine, the Secretariat of the Commissioner conducted open source monitoring in 2025. In the event of possible facts of violation of children's rights, based on the results of such monitoring, appropriate letters are sent to law enforcement agencies. Thus, in 2025, 76 letters were sent to the SSU and the Office of the Prosecutor-General of Ukraine to verify the facts identified and, if confirmed, to respond as appropriate.

In addition to the above international crimes (forcible transfer of children to the TOTs of Ukraine; deportation of children to the territory of Russia), the illegal implementation of Russian education standards in the occupied territories continues. The occupying state's practice of militarization and political indoctrination of Ukrainian children transferred to the TOTs of Ukraine and the territory of the Russian Federation is also systemic, as is the Russian Federation's disregard for the child's right to preserve their identity, enshrined in Article 8 of the 1989 Convention on the Rights of the Child.

a) Political Indoctrination

Russia continues to indoctrinate children in the TOTs of Ukraine, which consists in the formation of systemic policies to destroy the Ukrainian cultural and national identity of children, as well as imposing Russian citizenship on them through disinformation and coercion. In particular, this is happening through the ban on the use of the Ukrainian language in the educational process, the removal of the subjects like Ukrainian Language, Ukrainian Literature and History of Ukraine from the curricula and replacing them with Russian analogues that contain false facts about aggression against Ukraine, glorify the participants of the so-called special military operation, etc.

An important aspect of the recognition of the systemic Russian policy of destroying the Ukrainian identity of children was the decision of the European Court of Human Rights of July 9, 2025 in the case of *Ukraine and the Netherlands v. Russia*. The decision highlighted the issue of political indoctrination of children in the TOTs of Donetsk and Luhansk regions since 2014 and in other territories occupied by Russia since 2022. The court found that the imposition of the Russian language of instruction, the re-accreditation of educational institutions, the training of teachers for the transition to Russian educational standards, and other measures that had been applied in the TOTs of Donetsk and Luhansk regions since 2014 had been extended to other occupied territories. Such measures were filled with official Russian rhetoric that denied the existence of Ukraine as an independent state in order to legitimize the invasion of Ukraine. In the context of the new curriculum and the narrative line imposed by Russia, pupils received knowledge about the history of their country exclusively from the perspective of the interpretation of the occupation authorities, which contradicted the previously formed worldview and values. Therefore, the Court concluded that the above constitutes a violation of Article 2 of the Additional Protocol to the European Convention on Human Rights.

In 2025, the Ministry of Education of the Russian Federation approved 17 mandatory subjects for schools in the occupied territories. Among other subjects, only

History of Russia, General History and History of the Region will now be taught – without any Ukrainian content, and the subjects like Native Language, Native Literature or Second Foreign Language are allowed only upon parental request, but on the TOTs of Ukraine this carries a significant risk of persecution.

For its part, the aggressor state is resorting to pressure on families whose children continue their studies in Ukrainian schools. According to media reports, the occupation head of the city of Kakhovka announced his intentions to put pressure on parents whose children do not attend Russian schools. According to the official, in the occupied Kakhovka district, more than 200 children do not attend classes, some of them continue to study online in Ukrainian schools, for which parents should be held accountable: first they shall be subjected to fines, and then possible deprivation of parental rights may follow.

Representatives of the occupation administrations are resorting to systemic pressure and intimidation of children and parents. Thus, according to media reports, in the city of Henichesk, the local "commission for juvenile affairs" has been turned into an instrument of intimidation and coercion, where teenagers from alleged "difficult" families are forced to work in actual labour camps under the slogan of "patriotic education". In particular, during one of the commission meetings, the invaders openly declared the "need to involve teenagers in volunteering", but in reality, this foresees forced labour: cleaning the streets, participating in propaganda events, filming for Russian media, and in case of refusal, family members are threatened with the opening of criminal proceedings against them. Young men aged 16-17 are particularly under pressure, where representatives of the occupation administration blackmail them with "registration" and accelerated preparation for military service. This indicates that minors are deprived of protection from participation in armed conflicts.

The Russian Federation's systemic policy of imposing Russian citizenship continues to be implemented in the TOTs of Ukraine. Refusal to obtain Russian-style documents carries the risks of deprivation of access to basic services, separation of children from their families, and deportation. Such pressure on Ukrainian families in the TOTs is implemented at the local level under centralized leadership. Thus, in March 2025, the President of the Russian Federation adopted a decree indicating that Ukrainians who "lack legal grounds for stay" in the territory of the Russian Federation must leave by September 10, 2025 or undergo the "legalization" procedure. At the local level, an example of the implementation of the policy of forcing Russian citizenship can be the actions of the so-called "authorities" in the TOTs of Kherson region, when the occupation administration resorts to pressure on families who refuse to obtain Russian citizenship. Without a passport of a Russian citizen, residents of Askaniia Nova cannot receive medical care, and there are also difficulties in crossing checkpoints. Families with children are threatened with deprivation of parental rights and removal of children from families for refusing to apply for a Russian passport.

b) Militarization

The militarization of the educational process has become systemic in the educational sphere, effectively transforming educational institutions into instruments of ideological influence and political indoctrination of children in order to form in Ukrainian youth in the TOTs of Ukraine a readiness for absolute support for the Russian authorities, a lack of critical thinking in assessing the actions of the Russian authorities, and absolute trust regarding the narratives proclaimed by the authorities.

In September 2025, the Humanitarian Research Lab at the Yale School of Public Health (HRL) published its fourth report on the removal, re-education, and militarization of Ukrainian children by Russia. The researchers found that, since Russia's full-scale invasion of Ukraine in February 2022, Ukrainian children have been relocated to at least 210 locations in Russia and in the TOTs of Ukraine. This is the largest published number of facilities for the residence of Ukrainian children, although the actual figure is likely even higher.

Children are transferred to eight main types of institutions: cadet schools, military bases, medical institutions, religious institutions, secondary schools and universities, hotels

In 61.9 percent of institutions (130 out of 210), re-education measures were observed, including cultural, patriotic, and military propaganda. These programs are aimed at imposing pro-Russian narrative ideas that influence the children's worldview, which is a violation of their right to education, cultural identity, and freedom of belief. Children also underwent military training, which included combat exercises, ceremonial parades, work with drones, and military-historical education, which contradicts the norms of international humanitarian law.

Military-patriotic groups, mandatory military and combat training classes are organized in schools. The occupation authorities pursue a policy of involving Ukrainian children in military and "patriotic" youth groups, such as "Orlyata Rossiyi" ("Eaglets of Russia"), "Yunarmiya", "Dvizheniye Pervykh" ("Movement of the First"), "Voin" ("Warrior"), "Akhmat Peoples' Friendship Academy", "Zarnitsa 2.0", "Kadetskiy Korpus" ("Cadet Corps"), etc.

For example, in the Zaporizhzhia region, in the cities of Melitopol, Berdiansk, Troiany and Novopetrivka, a high level of militarization of children has been recorded - in particular, 13 cadet classes operate in these territories.⁷

The occupation "administration" of the Luhansk region has involved approximately 64 thousand children in the so-called volunteer corps of the Russian

⁷ <https://www.ukrinform.ua/rubric-regions/4007064-na-tot-zaporizza-die-13-kadetskih-klasiv-rosfgvardii-ta-fsb-dla-militarizacii-ditej.html>

Federation.⁸ Young men and women are involved, in particular, in the Russian youth patriotic organizations "Dvizheniye Pervykh" ("Movement of the First") and "Yunarmiya".

Similar cases are also occurring in the TOTs of the Kherson region. According to media reports, in one of the schools in the city of Henichesk, representatives of the occupation administrations have established three cadet classes of the Investigative Committee. In addition, it is reported that about 95 percent of primary school students in Kherson region have joined the children's movement "Orlyata Rossiya" ("Eaglets of Russia").

The military-patriotic movement "Yunarmiya" is expanding its activities⁹ and recruiting new members in the TOTs of the Kherson region, where the oldest students are seventeen years old, and the youngest are only eight. To attract children to this organization, representatives of the occupation authorities use social and financial incentives. For example, members of this organization receive benefits: separate meals, medals, awards and better grades, even if they do not have an adequate knowledge of the lesson material. Other students who refuse to join the movement do not receive the "benefits" and have to limit themselves to modest meals and suffer from prejudiced attitudes from teachers.

According to media reports, from September 1, 2025, new standards of educational load for students in Grades 1-4 have been introduced in the TOTs, which provide for additional hours for "military-patriotic education". In addition, in educational institutions in the TOTs of Ukraine in 2025, the occupation authorities launched a new series of propaganda "lessons of courage", during which militants praise the war and try to justify their presence on Ukrainian soil.

One example of the militarization of young Ukrainians is the story of a 15-year-old boy from the Kherson region,¹⁰ who has recently been winning medals at Ukrainian competitions, and is currently undergoing military training in a Russian camp on Shumshu Island, Sakhalin Region.

In addition, Ukrainian children from the TOTs are illegally transferred to the so-called re-education camps, which are located not only in the TOTs of Ukraine, in Russia and Belarus, but also in North Korea. According to the NGO "Regional Center for Human Rights", 165 re-education camps, where Ukrainian children are militarized and Russified, have been documented.

⁸ <https://realgazeta.com.ua/pryblyzno-64-tysiachi-ditey-zaluchyly-do-prorosiyskykh-molodizhno-viyskovykh-struktur-na-luhanshchyni-ova/>

⁹ <https://intent.press/news/war/2025/armiia-u-pivtora-miliona-ditei-z-okupovanoi-khersonshchini-peretvorili-na-soldativ/>

¹⁰ <https://www.facebook.com/sprotyv.official/videos/783545057659063/?rdid=jCRtA4m2aKw6lj0L>

One of the institutions from the aforementioned network is the Songdowon Camp, located in the territory of the DPRK¹¹. While remaining there, children, including minors from the TOTs of Ukraine, are subjected to ideological influence and politicization, forced to broadcast Russian propaganda narratives and are involved in building a strategic partnership between the two aggressor states.

c) Illegal Deportation and Forcible Displacement of Ukrainian Children

Russia widely uses schemes of illegal deportation and forcible displacement of children, disguised as so-called health and recreation. Physical displacement of children is not the ultimate goal of the occupying power. The main goal of the aggressor state is to scale up the chain of changes aimed at cultural assimilation and destruction of the identity of Ukrainian children.

For example, nearly 100 teenagers from the TOT of Zaporizhzhia region were taken to Volgograd to the camp of the military organization "Warrior" ("Voin") as part of the propaganda project "Time of Young Heroes"¹².

According to media reports, under the guise of "vacation", the ruling United Russia party is taking children from the temporarily occupied Kherson region to Novorossiysk. Here thousands of children who are isolated from their families and exposed to "Russian world" propaganda are meant.

During the summer holidays, the occupiers took Ukrainian children to camps for militarization and Russification,¹³ in particular, about 2,000 children were in the "Mandarin" and "I-Camp" summer camps in the occupied Crimea.

According to media reports, in the sanctioned Artek Camp, the occupiers plan to "rehabilitate" Ukrainian children for a year, but behind this concern lies the systematic destruction of Ukrainian identity, the imposition of foreign "values" and the militarization of adolescents.

The primary task for Ukraine remains the return of every Ukrainian child from deportation, forcible displacement and the TOTs of Ukraine. The support of international partners is of paramount importance for this. An important step in the issue of return is the adoption on December 3, 2025 by the UN General Assembly of Resolution A/ES-11/L.16/Rev.1, which contains a demand for Russia to immediately and unconditionally return all Ukrainian children who have been forcibly displaced or deported since the beginning of the war. The Assembly insists that the Russian Federation immediately cease any further practice of forced relocation, deportation, separation from families and other legal representatives, change of personal status, including through citizenship,

¹¹ <https://suspilne.media/1205500-pidmitati-pamatnik-vozdnam-rosia-vidpravila-hlopcika-z-makiivki-v-litnij-tabir-pivnicnoi-korei/>

¹² <https://donpatriot.news/gaulyajter-balyczkyj-vyhvalyayetsya-shho-blyzko-sta-pidlitkiv-z-okupovanoyi-terytoriyi-poyihaly-gotuvatysya-do-vijny-u-rosiyu>

¹³ <https://understandingwar.org/research/russia-ukraine/russian-occupation-update-july-7-2025/>

adoption or placement in foster families, as well as ideological indoctrination of Ukrainian children.

As of December 31, 2025, 1,943 children were returned within the framework of the initiative of the President of Ukraine "Bring Kids Back UA".

Family: uncle – legal guardian, a girl aged 10.

This is the story of a girl from Kharkiv region who lived with her father and grandfather during the occupation. She was just a child who needed school, a home, and peace - instead her childhood passed under the sounds of war.

One day, while taking a walk with her father, they came under fire. In a matter of seconds, she sustained a severe shrapnel wound. Following the attack, they were hospitalized in Russia. This was not a choice; the occupation robs people not only of their freedom but also of the right to choose, even in the most desperate moments.

Later, the girl was transported to the Mechta ("Dream") children's sanatorium in the Moscow region. The child woke up in another country, among strangers, without a home, without her belongings, without the feeling that there was someone nearby who would definitely protect her. In May 2025, the girl lost her father. This is a tragedy a child should never experience. She wanted to return home, to Ukraine, under the care of her uncle and grandfather, because they were her closest people. It was her only way back to a life where she was not alone.

But even here she had to fight. The Russian guardianship authorities began to manipulate her return and at first refused to ensure her departure. As if her pain and her loss were of no importance. As if they could simply stall for time and keep her where she should not be.

With the assistance of the Commissioner's Secretariat and other state bodies as well as the public, in December 2025 the girl will finally return to the territory controlled by Ukraine. Now she lives with her uncle, and his family has become her home.

The girl is now safe, but what she has experienced does not disappear immediately. Such stories leave a mark on a child's heart forever.

Another story of return, which displays the trials and endurance that families have to undergo before reunification.

Family: stepfather, mother, a boy aged 15.

This is a story about years of torture in prisons and complete isolation from the world, about life under occupation, where fear becomes a habit, and every day is a test of endurance. Mother, son and stepfather lived between hope and despair,

relying on each other only, since that is what kept them from breaking.

The stepfather managed to adapt and live quietly, but remained loyal to Ukraine. Despite his disability and severe injuries, he secretly passed information to the Ukrainian side, risking everything so that his son could grow up in a free country. In 2019, he was exposed and imprisoned.

While the stepfather was in captivity, the mother and son lived under constant pressure and fear. The young man went to a Russian school, where he was forced to listen to foreign narratives and the imposition of ideology, although at home he knew the truth. Being the family of a man held in a Russian prison for "espionage" in favor of Ukraine meant living every day cautiously, silently, with anxious feeling about each following day.

Six years of captivity became years of complete uncertainty. The stepfather clung to the memories of his son, to the voice of his beloved in his memory, and to the thought of a home that awaits.

In 2025, he managed to return home. Thereafter, he asked for help to evacuate his family from the occupation, and in the fall of that year, mother, son, and stepfather finally hugged each other.

Today, they are together in a safe place and are learning to live without fear, get used to silence, and restore trust in a life that has suffered through years of pain and hope.

The story of the return of a young man who, despite torture, intimidation and threats of execution, did not lose hope and the desire to return to his native Ukraine.

A young man aged 20.

He comes from Dniprorudne, Zaporizhzhia region. Before the war, he lived with his parents, went to school, had a normal life, where the biggest problems were supposed to be tests, plans for the future, and the first adult dreams. But after the start of the full-scale invasion, his city was under occupation, and everything that was "normal" disappeared almost instantly.

He witnessed how a foreign power came and brought with it violence and complete impunity. And despite his fear, he did not remain silent. Together with a group of his peers, he peacefully protested against the occupiers: he took down the flags of the Russian Federation and posted leaflets with simple words, which at that time were an act of incredible courage: "Dniprorudne is Ukraine".

In May 2022, he was detained. The guy was accused of "preparing a terrorist

attack" and brutal interrogations began. He was beaten. He was tortured with electric shocks. He was threatened with execution. And the scariest thing is that in such basements, a person very quickly understands: there is no law, no rules, and no limit beyond which they will not step.

For months, the young man was kept in conditions where one is not even allowed to feel like a human being. Without normal conditions. Without medical care. Without documents. He was constantly broken, pressured, forced to confess to things that had never happened, just to close the "case" and suppress any resistance.

Thereafter, the boy found himself in a reality where freedom became unattainable. Under the control of the occupation authorities, he studied at a college already according to Russian standards, was subjected to daily ideological pressure, went to the flag-raising ceremony, listened to the Russian anthem, and had to stand there, pretending that everything was fine with him. His Ukrainian documents were taken away, and any attempt to leave or seek help was blocked.

It is very difficult to explain such things to people who did not live in the conditions of war: when one's documents are taken away, this is not just about some papers being taken away. Your right to be yourself is taken away. The right to move. To choose. To have a future.

In 2024, the young man changed his place of residence to avoid persecution. He literally lived as if he could be taken away at any moment. And only with the support of non-governmental organizations and the Secretariat of the Commissioner was the young man able to return to the territory controlled by Ukraine in 2025.

Now he is safe. But what the young man experienced does not end the moment he crossed the border with the occupied territory. It remains inside: in the body, in memory, in the reaction to harsh sounds, in the distrust of people, in the silence after the word "torture".

Here is another story of a reunited family.

Family: grandmother, father – the Defender of Ukraine and a girl aged 13

Three years of child's suffering, three years of horror of Russian captivity of the child's father.

The mother of the Defender contacted the Secretariat of the Commissioner. In one moment, she experienced the psychological burden of loss of two close people: her son, who had been in captivity of the aggressor country since 2022, and her granddaughter, whom she had raised since birth, but at the beginning of the full-

scale invasion, the mother took the child to the Russian Federation, and then returned with her to the TOTs of Ukraine.

The Secretariat of the Commissioner carried out difficult and long-term work to return the girl to the territory controlled by Ukraine, who had seen nothing since 2022 except for hardships, poverty, and constant violence from her mother. During her stay with her mother, the child often remained hungry, was forced to live at train stations, and ended up in social institutions, which undermined her health. But thanks to our Institution, assistance was provided in registering guardianship for the grandmother, and with the mediation of the State of Qatar, the grandmother and the girl were able to be reunited.

However, the family definitively experienced the feeling of happiness and trust in the work of organizations involved in the return of our citizens when the Defender's mother received the phone call with the news that her son was in the territory controlled by Ukraine. Finally, after three restless years of waiting, the mother and daughter heard the voice of their dearest person.

Each return is individual and requires the combined efforts of the state, civil society and international partners. The Russian Federation refuses to provide any official statistics, blocks monitoring and does not respond to requests from international organizations, and does not allow UN representatives and other independent structures to visit places where children are being held, does not transfer information to the Central Tracing Agency within the framework of the Geneva Conventions and does not cooperate within the framework of humanitarian dialogue.

There are particularly difficult cases when the return of children does not take place for years, despite the presence of all the reasons.

A child from an institutional establishment aged 14

The Commissioner was contacted by a legal representative of 101 residents of the Municipal Institution of the Kherson Regional Council "Oleshky Children's Boarding House" regarding the forcible displacement and subsequent deportation of the children of the institution. In particular, the occupying authorities took the children in two stages: in October-November 2022 - to the TOTs of Ukraine, namely the Clinical Psychiatric Hospital No. 5 in the village of Strohanivka (Simferopol district). Thereafter, some of the children were transported to the Krasnodar Krai (Russian Federation), where they were placed in the Labinsk and Kropotkin orphanages, as well as the Bilohirsk orphanage in Bilohirsk.

With the assistance of the First Lady of the United States of America Melania Trump, in the fall of 2025, the Secretariat of the Commissioner returned 1 child from

the Municipal Institution of the Kherson Regional Council "Oleshky Children's Boarding House". In total, 7 children taken from the Municipal Institution of the Kherson Regional Council "Oleshky Children's Boarding House" were returned (1 of them was returned having reached full age already).

Another issue is the organization of the process of returning to Ukraine from the TOTs and the territory of the Russian Federation. In 2025, the route for the return of citizens from the TOTs of Ukraine provided for the use of a single checkpoint "Mokransky-Domanove" of the Volyn region bordering Belarus, which operates as a transit centre for persons returning from the TOTs of Ukraine.

The deterioration of the human rights situation at the TOTs of Ukraine, in particular the increase in the scale of violations related to the policy of cultural assimilation and the destruction of the identity of Ukrainian citizens, as well as the strengthening of the system of support for citizens after their return to the territory controlled by the Government of Ukraine, are among the factors influencing the increase in the number of Ukrainian citizens leaving the temporarily occupied territories. In particular, in 2025, 10,539 people crossed the state border of Ukraine at this checkpoint, of which 910 were under 18 years old and 445 were between 18 and 23 years old.

Since the specified checkpoint remains the only "humanitarian corridor" for return, the Commissioner initiated and carried out monitoring of the arrangement and activities of the specified checkpoint. Following the visit, special attention was paid to the development of a support system for returned families with children based on coordinated interaction between entities involved in the search, return, provision of accompaniment and reintegration of children who were deported or forcibly displaced as a result of the armed aggression of the Russian Federation.

According to the results of the first visit to the "Mokransky-Domanove" checkpoint, which was carried out with the participation of representatives of the public and state authorities involved in the return and reintegration process, notable was the absence of:

- properly equipped places of rest, including children's areas, for returnees;*
- access to drinking water, a place to rest or a place to feed minor children during a long-term stay at the temporary checkpoint;*
- access to medical care*
- as well as other violations.*

According to the results of the repeated monitoring visit carried out in December 2025, the arrangement of a transit centre for the temporary stay of returnees, including for families with children, was recorded. Among the positive changes: a children's room has been created, a mother-and-child room has been equipped with specially created sanitary and household conditions to meet the basic needs of families with children, and first medical aid provision has been secured. Rest rooms with sleeping places have been organized for the rest of citizens who have returned from the TOTs of Ukraine. In the case of temporary accommodation in the city of Kovel, returnees are offered hot meals.

Upon return to the territory controlled by the government of Ukraine, each child is provided with support and assistance. The Interagency Team for the Support and Reintegration of Children Who Have Been Deported, Forcibly Displaced or Returned from the TOTs of Ukraine continues to operate on the basis of the Secretariat of the Commissioner at the Child Rights Protection Center in the city of Kyiv (hereinafter referred to as the Center) in accordance with the procedure approved by the Resolution of the Government of Ukraine No. 551 of May 14, 2024 (hereinafter referred to as Resolution No. 551).

Thus, in 2025, in the Center, meetings with **794 children** were held. This significantly exceeds the number of meetings compared to 2024, when **141 children** met with the Interagency Team to resolve issues of support and reintegration, as well as provide testimony about international crimes of the Russian Federation against Ukrainian children. This indicates not only the success of implementing the goals of Resolution No. 551, but also the leading role of the Center as an example of implementing the principles of child-friendly justice.

Employees of the Secretariat of the Commissioner interact with the Office of the Prosecutor-General of Ukraine and the SSU, since one of the key functions is to document and record violations of the rights of children who have suffered as a result of military actions and occupation.

The psychological state of children returning to the territory controlled by Ukraine is extremely vulnerable and depressed. Therefore, after their return, psychologists are the first to communicate with children.

The Center works using the standards of the Barnahus model, so conditions are created for children who have suffered violence or witnessed a crime to avoid direct contact with law enforcement officers. Instead, a psychologist conducts the conversation, adapts the investigators' questions, determines the child's willingness to speak and the child's overall psycho-emotional state. All of this helps minimize the risks of retraumatization and facilitates the process of sharing experiences.

The Interagency Support Team includes employees of the Commissioner's Secretariat, the Coordination Center for Family Upbringing and Child Care Development, the State Migration Service of Ukraine, the State Service for Children, representatives of law enforcement agencies and other state bodies and public organizations concerned.

The Interagency Support Team carries out activities to assist in the renewal/execution of documents, conducting a medical examination, providing temporary housing, socio-psychological rehabilitation of the child and their family members, as well as ensuring the child's right to education and family upbringing.

Since the opening of the Center, as of the end of 2025, representatives of the Commissioner's Secretariat have participated in 78 meetings of the Interagency Support Team, the results of which have provided assistance in:

- conducting medical examinations of 552 children and 2 parents;
- arranging education for 251 children;
- providing temporary housing for 309 children and their parents;
- arranging family and alternative forms of upbringing for 108 children;
- providing basic humanitarian needs for 886 children;
- restoring/providing identification documents for 651 children;
- registering the status of children and appointing a legal guardian for 100 children;
- providing social support and psychological assistance to 949 children.

However, in course of the implementation of measures to return children to the territory controlled by Ukraine and subsequent support, there were numerous cases of non-compliance by the Services for Children, employees of local executive authorities, and local self-government bodies with the requirements for granting a child the status of an orphan and a child deprived of parental care, placing such children on primary registration and establishing guardianship or care over them under a simplified procedure in accordance with Paragraphs 79 to 79-3 of the Procedure for Conducting Activities Related to the Protection of the Rights of the Child by Guardianship and Care Bodies, approved by the Resolution of the Government of Ukraine No. 866 of September 24, 2008.

In addition, young people (up to 23 years old) returning from deportation, forcible displacement, and the TOTs in Ukraine face a number of challenges. Particularly acute is the issue of personal identification. In a number of cases, Ukrainian-style documents (passport, birth certificate) have been lost, were not obtained in time, or are damaged. In such instances, the personal identification process can be lengthy and may restrict access to services. On the other hand, diplomas and certificates issued in the TOTs of Ukraine or in the territory of the Russian Federation have no legal force in the territory of Ukraine. Therefore, young people undergo a procedure for the recognition of learning outcomes in order to be able to obtain a Ukrainian-style diploma for further employment or education,

as well as to continue their studies in Ukrainian educational institutions and subsequently receive a Ukrainian-style diploma.

Among the positive steps taken by the state toward supporting returned children, the introduction of a special payment should be noted. Specifically, the Government of Ukraine has introduced a new form of social assistance for children (under 18 years old) and youth (under 23 years old) who have returned from deportation, forcible displacement, and the TOTs of Ukraine – the so-called "settling-in" payments (support grants) in the amount of UAH 50,000. These funds are provided to support the adaptation of the child or youth following their return to the territory controlled by Ukraine.

Similar support programs are also being introduced at the regional level. An example of this is the introduction by the Kherson Regional Military Administration of one-time financial assistance for children who were registered in the Kherson region and returned to Ukraine from the Russian Federation, the Republic of Belarus, or from the TOTs of the region after the full-scale invasion. Under this mechanism, more than 400 children from the Kherson region have already received financial assistance totalling UAH 12,330,000.

The implementation of such programs helps strengthen the mechanism for the reintegration of children and youth into Ukraine after their return. The necessity of introducing special support programs was emphasized in the Special Report of the Commissioner on the access to education for children and youth in the TOTs of Ukraine.

With the aim of strengthening the system of parliamentary oversight in the field of child rights protection and the capacity of the Commissioner's Secretariat at the local level, Child Rights Protection Centers were opened in 2025 in the cities of Rivne, Dnipro, Lutsk, and Kharkiv. The presence of regional Centers allows the Commissioner to work directly "on the spot", taking into account the needs of children and their families. Each Center includes a safe, neutral, and child-friendly space to reduce anxiety and prevent (re)traumatization of persons who have survived violence or witnessed it.

Additionally, communication spaces are established in the Centers to facilitate the implementation of scientific, educational, youth, and children's projects, as well as public initiatives. Thanks to the equipment of the appropriate communication space, it will be possible to expand cooperation with representatives of the state and civil society, including stakeholders such as educational institutions, non-governmental organizations, and charitable foundations, active youth, and children. The public reception area is used for organizing personal meetings with applicants by the Commissioner's Representative in the respective region and officials of the Secretariat of the Commissioner.

4.1.2. Right to Obtain the Status of a Child Affected by War and Armed Conflicts

During 2024-2025, the Commissioner received applications regarding the unlawful denial or delay in granting the status of a child affected by war and armed conflicts.

The status of a child affected by war and armed conflicts is a significant step toward protecting child rights in Ukraine. It should be noted that, at present, there is a lack of necessary benefits and services associated with this status at the state level; therefore, adequate support and assistance for processing the traumatic experiences that serve as the basis for granting the status are not provided. At the same time, this status lays the foundation for social support and rehabilitation of children once relevant government programs are developed. Non-governmental programs and programs introduced by local self-government bodies already include this status as a basis for receiving assistance.

Consequently, lengthy processing times for applications and denials of status hindered the realization of the affected child's right to obtain such status and deprived them of the opportunity to benefit from support programs and incentives in communities where relevant programs had been implemented. Furthermore, since the introduction of the status application procedure, the volume of requests has exceeded the processing capacity of the guardianship and trusteeship authorities in communities where families with children who relocated due to hostilities reside.

The chart below illustrates the statistics of applications received by the Services for Children in 2025 compared to the previous year regarding the acquisition of the status of a child affected by war and armed conflicts, denials of such status, and the primary reasons for refusal:



Based on the processing of citizens' appeals last year, **2,216 denials** of status were issued across Ukraine. The highest number of denials was recorded in the city of Kyiv – **604** (5.2 percent of applications submitted), followed by Kyiv region – **269** (0.6 percent),

Donetsk region – **204** (0.6 percent), Dnipropetrovsk region – **162** (1 percent), and Lviv region – **123** (2.5 percent).

The primary reasons for the denial of status were:

2. Lack of documentary evidence of the circumstances defined by Article 30-1 of the Law of Ukraine "On Childhood Protection" (hereinafter referred to as the Law No. 2402-III) and the Procedure for Granting the Status of a Child Affected by War and Armed Conflicts, approved by the Resolution of the Government of Ukraine No. 268 of April 5, 2017 (hereinafter referred to as the Procedure No. 268);
3. Failure to submit or submission of an incomplete package of documents as prescribed by the Procedure;
4. Non-compliance of the submitted documents with established requirements (including format and content);
5. Lack of a causal link between the stated circumstances and military actions or armed conflict.

Within the scope of reviewing appeals and open proceedings, the Commissioner identified a discrepancy between the provisions of Article 30-1 of Law No. 2402-III and Item 5 of Procedure No. 268. Specifically, Article 30-1 stipulates that the status is granted by the guardianship and trusteeship authority at the child's place of registration as an internally displaced person (IDP). Meanwhile, paragraph 5 of Procedure No. 268 provides for a broader range of categories eligible for the status and an expanded list of entities authorized to grant such status. Following the proceedings regarding the violation of the rights of children who were denied the relevant status, a submission was sent to the Ministry of Social Policy demanding measures to eliminate the identified violations and to initiate amendments to the current legislation.

In response, the Ministry of Social Policy, Family, and Unity of Ukraine introduced amendments to Law No. 2402-III and Procedure No. 268, which allowed for an expansion of the grounds for obtaining the status of a child affected by war and armed conflicts and simplified the acquisition process.

4.1.3. Right of the Child to Life and Safety (Evacuation)

In 2025, the Russian Federation intensified shelling of the territory of Ukraine, targeting critical infrastructure, civilian residences, healthcare and education facilities, and other targets which may not be attacked. Therefore, the issue of ensuring the safety of children, in particular in areas of active hostilities and those close to them, has become particularly acute.

For the mandatory forced evacuation of families with children from the zone of possible or current hostilities, the provisions of the Resolution of the Government of Ukraine No. 841 of October 30, 2013 (as amended) are used, which determines the Procedure for conducting evacuation in the event of a threat of occurrence or occurrence of emergency situations. In particular, in order to protect children who are in the combat zone and nearby territories, under the conditions of martial law, a regional military

administration may make decisions on the mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives from a separate settlement in the area where combat operations are underway or may begin. These decisions are made in agreement with the military command bodies in the relevant territory and the Coordination Headquarters for Evacuation Measures and Effective Response to Mass Displacement of the Population.

It is worth noting that the mandatory forced evacuation of children, as a rule, is carried out while accompanied by one of the parents, a person replacing them, or another legal representative, and refusal, in accordance with the legislation, is not permitted. At the same time, the current legislation of Ukraine introduces changes regarding the possibility of evacuating children without the consent of a legal representative in order to preserve the life and health of the child in conditions of armed conflict since in 2025, the situation in the regions bordering the territory of the Russian Federation remained tense, unpredictable and dynamic due to the long front line and the number of territories where active hostilities are underway.

Due to the refusal for evacuation, the return of children with their parents back to dangerous territories after evacuation, as well as other unresolved issues of evacuation measures in 2025, there were cases of violations of the rights of the child.

In order to monitor the process of mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives, in February 2025, employees of the Secretariat of the Commissioner made working visits to the cities of Shostka, Sumy, Kharkiv, Iziium, Kramatorsk, Sloviansk, Zaporizhzhia and Mykolaiv.

As part of the working trip, meetings were held in each of the mentioned cities with the participation of Representatives of the Commissioner in the regions, local self-government and executive bodies, law enforcement agencies, as well as with the participation of representatives of the public regarding the mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives. Problematic issues of such evacuation were discussed. Following the results of the working trip, the Commissioner sent a corresponding letter with observations and proposals to the Government of Ukraine.

It is worth noting that some observations and proposals regarding the mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives were taken into account during the preparation of the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine Regarding the Regulation of Evacuation, Accommodation and Life Support of Evacuated Population, Ensuring the Protection of Children in Settlements Located in the Territories of Current and Possible Military (Combat) Operations". In addition, issues regarding the implementation of a state quality standard for personal protective equipment for children (body armour and helmets) used during evacuation measures, as well as the provision of personal protective equipment for children under 4 years of age, remain unresolved.

Donetsk Region

A situation has developed in the territory of Donetsk region that does not allow ensuring the safety of the civilian population; accordingly decisions were made to carry out mandatory forced evacuation of children with their parents, other legal representatives or persons replacing them in settlements belonging to 12 territorial communities of the region. According to the results of the meeting of the Coordination Headquarters for Evacuation Measures, as of the end of December 2025, mandatory evacuation of parents with children was announced in 19 settlements of the Donetsk region¹⁴.

As of the end of 2025, **6,073 children** had been evacuated, and another **716 children** needed evacuation. In total, according to operational information, **12,412 children** are in the Ukrainian-controlled territory of Donetsk region.

The return of **35 families** with **42 children** to the settlements belonging to certain territorial communities of the Donetsk region, where a mandatory forced evacuation of children with their parents, other legal representatives or persons replacing them had been announced, was also recorded.

In August 2025, a citizen who is currently abroad addressed the Commissioner with a request to help evacuate her family from the Donetsk region. The applicant's sister with two children refused to evacuate, putting not only herself but also her children in mortal danger. The applicant's parents, elderly people with disabilities, also did not want to evacuate.

In order to establish the facts set forth in the appeal, a letter was sent to the Donetsk Regional State Administration and it was discovered that the children had been evacuated to Kharkiv region, yet their grandfather and grandmother categorically refused to leave the dangerous territory, despite the explanatory measures taken by the police.

According to the results of monitoring of open sources of information, even more tragic consequences of irresponsible decisions of adults were revealed - in particular, the return of children to the combat zone and the abandonment of children in dangerous areas. For example, in October 2025, it was discovered that parents, having evacuated, left their six-year-old daughter with her grandmother in a settlement where a mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives was announced. During the shelling, the child was seriously injured and was admitted to the hospital. As it turned out, the family repeatedly returned to the dangerous area on their own after the evacuation, and the mother basically left the child, relying on the grandmother's promises to "leave later". Following this fact, at the end of

¹⁴<https://www.kmu.gov.ua/news/ukhvaleno-rishennia-pro-oholoshennia-oboviazkovo-evakuatsii-ditei-z-19-naselenykh-punktiv-donechchyny-rezultaty-zasidannia-koordinatsiinoho-shtabu>

December last year, the child's mother was reported on suspicion of malicious failure to fulfil the legally established duties regarding the care of the child, which led to serious consequences (Article 166 of the Criminal Code of Ukraine).

Another resonant case which appeared in the media involves a 13-year-old girl who remained in one of the cities in the Donetsk region under active hostilities. Left without adult assistance and facing the challenges of war alone - her house destroyed and parents missing - the child hid in a basement until volunteers reached her location on foot under constant threat of drone attacks and evacuated her from the dangerous territory.

It is particularly noteworthy that officially, the girl was listed as evacuated, and information regarding her actual return to the community remained outside the control of relevant services for a long period. It has since been established that the child is safe and has been temporarily placed with a family of acquaintances.

Kharkiv Region

In October 2025, due to the deterioration of the security situation, the Kharkiv Regional Military Administration announced the mandatory forced evacuation of children with their parents, other legal representatives or persons replacing them. The evacuation of the population took place from 40 settlements of the Kupiansk district, primarily the Velykyy Burluk, Shevchenkove settlement, and Vilkhuvatka village territorial communities. In addition, the community zone covered the settlements of the Kupiansk district. **610 children** were subject to evacuation, **604 children** were evacuated, and **6 children** remained to be evacuated. Information work is being carried out with the parents of children subject to evacuation.

Despite the fact that the legislation prohibits refusal of forcible evacuation of children with their parents, other legal representatives or persons replacing them, there are cases when legal representatives of children hide them, thereby evading evacuation. A telling example is the discovery of dozens of children in the city of Kupiansk, Kharkiv region, during the Kupiansk operation by the Defence Forces of Ukraine on December 11-12, 2025. Due to the refusal of parents from the forcible evacuation of children with their parents, persons replacing them or other legal representatives, the children remained in areas of active hostilities, and were also used as a "human shield" by the military of the aggressor state during the invasion of the city of Kupiansk.

According to the head of the Kupiansk District Military Administration,¹⁵ as of mid-December 2025, **42 children** remain in danger in settlements where such evacuation has been announced.

¹⁵ <https://suspilne.media/kharkiv/1190460-obovazkova-evakuacia-ditej-v-primusovij-sposib-z-kupansini-zaversena-ponad-40-nepovnolitnih-lisilisa-vdoma/>

Sumy Region

In Sumy region, mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives was announced in settlements of 11 territorial communities of the region, where **804 children** were subject to evacuation, including **12 children** who have the status of orphans and children deprived of parental care.

As of the end of 2025, all children have been evacuated, including those who have the status of orphans and children deprived of parental care, left on their own together with their legal representatives.

It is worth noting that in December last year, servicemen of the Armed Forces of the Russian Federation illegally detained about 50 civilians - residents of the village of Hrabovske, Sumy region, held them without access to means of communication and proper conditions, and on December 20, 2025, forcibly took them to the territory of the Russian Federation. According to available information, there were no children among the civilian population. Such actions of the occupiers are a gross violation of international humanitarian law, in particular; war crimes with a material element in the form of illegal deprivation of liberty and illegal deportation of the civilian population are likely to have been committed.

Chernihiv Region

As of the end of 2025, **1,484 children** reside in settlements located within 20 km of the border with the Russian Federation. The distribution is as follows:

Up to 5 km: **6 children**;

From 5 km to 10 km: **189 children**;

From 10 km to 20 km: **1,289 children**.

However, no decision has been made regarding the mandatory forced evacuation of children accompanied by their parents, persons replacing them, or other legal representatives from the border settlements of Chernihiv region.

Dnipropetrovsk Region

Due to the deterioration of the security situation in communities bordering Donetsk and Zaporizhzhia regions, as of the end of December 2025, a mandatory forced evacuation of children with their parents, persons replacing them, or other legal representatives from 63 settlements of the Synelnykove district on the territories of the Mezhova, Malomykhailivka, Velykomykhailivka, Novopavlivka, Slovianka, Pokrovske communities of the region was announced. As of December 31, 2025, **4,817 children** were evacuated from the specified communities in this way, another **697 children** had been evacuated with their families before the evacuation was announced.

Zaporizhzhia Region

Throughout 2025, local self-government bodies of Zaporizhzhia region made decisions regarding the mandatory forced evacuation of children accompanied by their parents, persons replacing them, or other legal representatives from 22 settlements across 8 communities in 3 districts of the region.

As a result of these measures, **293 children** were forcibly evacuated during the year.

Mykolaiv Region

In Mykolaiv region, the Regional Military Administration, in cooperation with the Operational Command South, local executive bodies, and local self-government bodies, maintains constant monitoring of the security situation in the Ochakiv and Kutsurub territorial communities, where **1,727 children** currently reside. However, no decisions have been made regarding the mandatory forced evacuation of children with parents, persons replacing them or other legal representatives in this region.

Kherson Region

A similar situation is observed in Kherson region, where the Regional Military Administration continuously monitors the presence of children in settlements within de-occupied territories for further response. Nevertheless, mandatory forced evacuation of children with parents, persons replacing them or other legal representatives has not been carried out.

It is worth noting that recorded cases of refusal to evacuate, lack of consent from legal representatives, concealment of children, and families returning to settlements where mandatory forced evacuation of children with parents, persons replacing them or other legal representatives is carried out after evacuation highlight gaps in the current legal regulation of this issue.

To address these challenges, the Parliament of Ukraine adopted the Law of Ukraine "On Amending Certain Legislative Acts of Ukraine Regarding the Regulation of Evacuation, Accommodation, and Life Support of the Evacuated Population, and Ensuring the Protection of Children in Settlements Located in Territories of Current and Possible Military (Combat) Operations".

The amendments to the legislation are designed to resolve unresolved issues of mandatory forced evacuation of children in and near areas of active hostilities. The Law defines the powers of state authorities, the responsibility of parents or their legal representatives for evading or concealing the forced evacuation of children and improves the mechanism for carrying out measures to evacuate the population under the legal regime of martial law.

At the same time, in order to implement the changes introduced by the aforementioned Law, it is necessary to prepare subordinate legal acts that will clearly define the status of children to whom the provisions of the legislation on mandatory

forced evacuation without the consent of parents or legal representatives have been applied, and will govern the issues of persons responsible for such a child at each stage of evacuation. Equally important is the issue of establishing support from the state to be provided to children after evacuation, the procedure for returning such children to their parents or legal representatives if they were evacuated from areas of current or possible hostilities. In order to monitor compliance with the rights of the child under martial law, it is also advisable to keep records of children forcibly evacuated without the consent of their legal representatives, as this would help to obtain timely information, provide support and monitor changes in the process of evacuation from communities and illegal return to communities close to areas of current hostilities.

4.1.4. Right of the Child to Upbringing in a Family Environment

The right of a child to upbringing in a family is protected by Article 51 of the Constitution of Ukraine, Article 11 of the Law of Ukraine "On Childhood Protection", enshrined in Articles 150, 151, 153 of the Family Code of Ukraine, as well as international acts, in particular Articles 7 and 9 of the 1989 Convention on the Rights of the Child.

The Law of Ukraine "On Mobilization Training and Mobilization" provides for an exhaustive list of grounds for receiving a deferment from conscription for military service during mobilization. At the same time, there are cases when parents did not exercise their right to receive a deferment from military service during mobilization in a timely manner, thereby jeopardizing the right of their children to be raised in a family.

The reasons for the occurrence of the described situations may be diverse: insufficient communication with those liable for military service, fear of being mobilized when submitting documents, lack of a complete package of documents for obtaining a deferment from mobilization (e.g. lack of a court decision on the deprivation of one of the parents of parental rights, since the case is pending), etc.

In 2025, the Secretariat of the Commissioner received **6 appeals**, including from children, regarding the violation of the right to grow up in a family environment. The appeals indicated that employees of district TRSSCs mobilized parents who were raising children on their own, in particular, when the second parent died or was deprived of parental rights.

In order to verify the facts set forth in the appeals and take measures, the Ukrainian Parliament Commissioner for Human Rights decided to initiate proceedings on the above-mentioned appeals.

As part of the proceedings, relevant requests were sent to the competent authorities to take appropriate response measures to restore the right of children to family upbringing. As a result of the measures taken, the right of **5 children** to family upbringing was restored.

4.1.5. Involvement of Ukrainian Children into Participation in Armed Conflict

In conditions of martial law, the aggressor state resorts to a wide variety of methods of waging war, in particular using hybrid means. Since the commencement of the full-scale invasion of the Russian Federation into the territory of Ukraine, the enemy has made repeated attempts to use Ukrainian children during the armed conflict to achieve its own goals.

The development of digital technologies allows the Russian Federation to use children to achieve military goals by involving them in the performance of a number of so-called "tasks" against Ukraine. In particular, children who are in the territory of Ukraine or abroad are exposed to information influence through social networks, messengers, online games or other communication channels. Children receive messages, are invited to private chats, are offered to perform the so-called "tasks" - spreading disinformation, collecting and providing information, performing certain actions such as bombing, arson, etc. Such methods are aimed not only at specific actions, but also at influencing the worldview of children, destabilizing the situation in the region or country, other military goals or facilitating their achievement.

Gradually, the child is immersed in an environment where a sense of complicity can turn into a tool of manipulation. This can be defined as a manifestation of objectification: when the child is viewed not as a person, but as a means to achieve military goals. At the same time, the child will not always be a direct participant in hostilities, which may indicate a lack of grounds for qualifying the relevant actions as recruitment or other offenses related to the use of children in hostilities and armed conflicts. Thus, a tendency is being formed to instrumentalize a child or use them as a means of waging war (weaponisation), which is not properly regulated either in international or national legislation. Specifically, in terms of urgent tasks, concepts like remote recruitment and the use of children as a means of waging war are not regulated by the norms of international law, and the peculiarities of bringing to justice for offenses, including criminal ones, committed by children under the leadership of the Russian Federation, are not proscribed. The relevance and priority of solving this issue is confirmed by life practice. After all, in 2025, a number of events took place with the involvement of children, the organization of which was aimed at weakening the state through explosions, arsons, causing bodily harm, and destroying objects of defensive importance.

For instance, in February 2025, a series of arson attacks concerning cars belonging to the AFU servicemen took place in Odesa region. According to the National Police of Ukraine¹⁶, in the Kyivskyi district of the city of Odesa, a 14-year-old boy set fire to a serviceman's car, and a 15-year-old boy burned a service SUV of the AFU. The minors carried out the instructions of the Russian special services, but did not receive any money for it. In the Rozdilnyanskyi district of the city of Odesa, three teenagers were caught

¹⁶ <https://npu.gov.ua/news/na-odeshchyni-natspolitsiia-ta-sbu-zatrymaly-shistokh-nepovnolitnikh-iaki-na-zamovlennia-rf-palyly-avto-zsu>

setting fire to a car of a serviceman of the SBGS, and in the Khadzhibeyskyi district, a 16-year-old girl was caught setting fire to two military cars in the regional centre.

In August 2025, a 16-year-old boy in Zhytomyr region received a sentence of 4 years in prison on charges of preparing sabotage. From the curators, he received instructions on making a homemade explosive device and installing it near the Zhytomyr Regional Military Administration building.¹⁷

In July 2025, the case of a 15-year-old teenager who blew up a police station building in Kharkiv was considered¹⁸. In December 2024, the teenager planted explosives and detonated them. The explosion damaged the police building, and the blast wave affected the regional perinatal centre and cars parked nearby.

In total, according to the Office of the Prosecutor-General, in 2025, 63 criminal proceedings were registered in the URPTI on the facts of minors committing criminal offenses against the foundations of national security of Ukraine, in which 71 minors were reported on suspicion.

According to the Ministry of Justice of Ukraine, as of the end of 2025, the number of minors held in custody and accused of committing criminal offenses against the foundations of national security of Ukraine is 43.

Three minors, as of the end of 2025, are serving sentences in the correctional facility for committing the above-mentioned criminal offenses.

At the same time, it is worth highlighting that in a number of cases, when representatives of the aggressor country try to involve them in committing illegal actions, children report the fact of involvement to law enforcement agencies. According to the National Police of Ukraine, in 2025, 153 reports of attempts to involve children in sabotage and other actions directed against the foundations of national security of Ukraine were recorded. Such attempts were not completed, since in these situations the children understood the enemy's intention and the illegality of the proposed actions, refusing to carry them out. Therefore, the actions taken to prevent the commission of criminal offenses can be considered productive and children and their parents should continue to be informed about the relevant trend, using the positive examples described. Children should understand both the illegality of the actions and who to contact in case of an attempt to involve them in illegal actions.

This also means that carrying out information and educational work to prevent the involvement of children in armed conflicts remains a priority activity of all entities concerned. Part 2 of Article 30 of the Law of Ukraine "On Childhood Protection" stipulates that the state shall take all possible measures to prevent the recruitment and use of children in hostilities and armed conflicts, identify recruited children and release

¹⁷ <https://www.bbc.com/ukrainian/articles/c75vnl0p9y6o>

¹⁸ <https://2day.kh.ua/ua/kharkow/u-kharkovi-15-richnoho-pidlitka-sudytymut-za-terakt>

them from military service. In addition, the law stipulates that the Ministry of Social Policy, Family and Unity of Ukraine shall carry out extensive information and educational work on the protection of children from participation in hostilities and armed conflicts. The involvement of the media, tutors, non-governmental organizations and other representatives of civil society is important for preventing attempts by representatives of the aggressor country to involve children in sabotage and overcoming the stigmatization of contacting law enforcement agencies about an attempt to involve them in such illegal actions.

4.2. Situation with Regard to the Observance of the Rights of the Child in Facilities of the Institutional Care and Upbringing System

The reform of the system of institutional care and upbringing of children, which began with the adoption of the relevant National Strategy adopted for 2017–2026, initiated the "deinstitutionalization reform". The goal of the reform, which began in 2017, was the transition to family forms of upbringing and the creation of alternative services at the community level - changing the system of institutional care and upbringing of children to a system that provides care and upbringing of a child in a family environment or an environment close to the family one.

The Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024–2028 was subsequently approved by the Order of the Government of Ukraine of November 26, 2024 No. 1201-p, with the simultaneous cancellation of the previous Strategy, which was to be implemented during 2017–2026. The new document defined the right of every child to grow up in a family environment as a key task of state policy, which is of great importance for the preservation and development of the human capital of Ukraine and provides for the reform of the system of care and support for children.

As of the end of 2025, according to the information provided by the NSSU, there are **670 institutions** of various types, forms of ownership and subordination operating in Ukraine, in which **23,524 children** are placed for a round-the-clock stay, in particular:

- **466 educational institutions (19,410 children, of whom 2,028 are orphans, children deprived of parental care);**
- **140 social protection institutions (2,627 children, of whom 1,238 are orphans, children deprived of parental care);**
- **29 healthcare institutions (675 children, of which 429 are orphans, children deprived of parental care);**
- **35 private institutions (812 children, of which 148 are orphans, children deprived of parental care).**

During 2025, the Secretariat of the Commissioner, together with the involved experts and public monitors, carried out 936 visits (of which 110 were non-visiting monitoring) to institutions, establishments and organizations, in particular, CSs and SSCs, educational institutions, including specialized schools and educational and rehabilitation centers, healthcare institutions, as well as pre-trial detention centers and penitentiary institutions, etc. in 23 regions of Ukraine and the city of Kyiv.

It is important to note that, despite the state's policy of prioritizing the development of family forms of upbringing, the implementation of the respective policy cannot serve as a basis or justification for the mistreatment of children who remain in institutional care and upbringing institutions (in particular, regarding the failure to provide decent living conditions for children)

However, the transitional period of reform does not allow for the deterioration of the material and living conditions of children, a decrease in the quality or volume of care, as well as the failure to provide competent, professional and continuous care, access to social, medical, legal, educational and other services guaranteed by legislation and international standards in the field of the rights of the child.

In this context, monitoring compliance with the rights of children who are placed in institutional care and upbringing institutions for round-the-clock stay is one of the key components of the Commissioner's mandate and is aimed at preventing violations of children's rights, regardless of the stage or format of the reform implementation. During the monitoring of institutions for institutional care and upbringing of children, employees of the Secretariat of the Commissioner recorded violations of the rights of the child, in particular to life and safety, to protection from all forms of violence, to decent living conditions, to care and upbringing in a family environment, and to health care. A detailed description of violations of the rights of the child is provided below.

4.2.1. Violation of the Right to Protection from all Forms of Violence

Within the framework of parliamentary control, the Secretariat of the Commissioner continues to record facts not only of improper care for children who have the status of an orphan and a child deprived of parental care, as well as children in difficult life circumstances, but also of violence against them directly in institutions.

The results of monitoring indicate the presence of a systemic problem of violence and cruel treatment of children who are in institutions for institutional care and upbringing, as well as other institutions where children are placed for a round-the-clock stay. During 2025, the Secretariat of the Commissioner identified the circumstances of 205 gross cases of violation of the child's right to protection from violence and cruel treatment. In particular, the following were identified:

- sexual, physical, and psychological violence against children in institutions by management and employees of institutions; besides, during the monitoring, cases of

violence between pupils were identified, which were concealed by the management and staff of the institutions;

- placement of children in psychiatric institutions, medical isolation rooms as punishment (or threat of placement) - hundreds of cases were identified when children in institutions were punished by being sent to a psychiatric hospital and forced to use psychotropic drugs;

- economic violence (depriving children of meals, access to humanitarian aid, preventing access to education, other benefits, including as punishment).

The identified violations are of different nature, but a common feature is their long-term concealment, formal response or complete lack of proper response from the management of the institutions and responsible entities.

During a monitoring visit to one of the institutions in Chernivtsi region, circumstances of improper response by the administration of the institution to reports of sexual violence against a child were identified.

In particular, as a result of receiving a complaint about the possible molestation of a female pupil of the institution, the institution's administration conducted an internal investigation, which did not establish signs of sexual violence or harassment. The grounds for refuting the circumstances set forth in the complaint, according to the materials of the internal investigation, were the written explanations of the alleged molester, in which the latter denied committing unlawful acts.

Monitoring visits to the CS and the local police department also confirmed that the responsible entities failed to assess the level of safety of the alleged victim and take other urgent measures. The alleged perpetrator continued to perform his duties and interact with children, which made it possible to repeat the violence and exert pressure on children in order to conceal data.

Despite the presence in the materials of the disciplinary proceedings of screenshots of the correspondence between the institution's employee and the underage pupil (the use of sexualized media content during communication in the messenger), the institution's management had failed to assess them properly.

In order to respond to the above circumstances, the Commissioner has appealed to the Office of the Prosecutor-General to conduct a full and comprehensive investigation of the above-mentioned circumstances. Criminal proceedings are ongoing.

In most cases, it has been established that the circumstances of the use of cruel treatment and violence against children are not only concealed by the staff of the

institutions, but are carried out on the initiative or with the consent of the heads of the institutions. The Secretariat of the Commissioner has recorded cases in which the heads of institutions of the institutional care and upbringing system abused the powers of the legal representation of children having the status of orphans and children deprived of parental care, placed in such institutions for full state maintenance, justifying the commission of violence against children whose rights they should protect.

During a monitoring visit to the "Centre for Medical Rehabilitation and Palliative Care for Children" Branch of the Municipal Non-Profit Enterprise "Mykolaiv Regional Children's Clinical Hospital" of the Mykolaiv Regional Council, circumstances of tying and fixing young children were revealed. In particular, N., a seven-year-old child, was fixed in a stroller using fabric elements that were attached from above, passed along the body and between the legs. M., a seven-month-old child, had their hands bandaged, unable to bend/unbend the elbows. M., a three-year-old child, was found tied with a fabric belt to a high chair for feeding.

As the monitoring group found out, the fixation of children was carried out in order to simplify their care and did not contain a regulatory justification in the medical documentation.

In order to respond to the detected violation, representatives of the Secretariat of the Commissioner immediately called the investigative and operational group of the National Police of Ukraine and filed a statement of a crime, and criminal proceedings are ongoing.

The extremely vulnerable state in which children are in institutional care and upbringing institutions is particularly aggravated by the lack of response of responsible entities, in particular the National Police of Ukraine, to reports of violence against children. There have been numerous cases of law enforcement officers ignoring reports of violence against children. Failure to enter relevant information into the URPTI has led to failure to conduct appropriate investigative actions using the principles of child-friendly justice (appointing a lawyer to the victim child, involving a psychologist, etc.)

The Commissioner received a complaint from a 15-year-old boy regarding the possible torture of another child in a psychiatric facility in Zhytomyr. According to the boy, the minor girl was tied to a bed while hospital staff inflicted bodily harm on her. The boy noted that he had already filed a report of the crime with the National Police of Ukraine, but had been refused action since he is a minor.

In order to immediately respond to the child's report, the Commissioner's Secretariat conducted a monitoring visit to the facility, recorded the facts of the child's rights violation, and filed a report of the crime. In addition, the Commissioner appealed to the Office of the Prosecutor-General and the National Police of Ukraine

to monitor the pre-trial investigation and assess the actions of law enforcement officers who ignored the child's complaint.

Based on the results of the official investigation, disciplinary measures were taken against the guilty police officers. Criminal proceedings are ongoing.

Instead, the inadequate response, the circumstances of concealment by subjects of cases of violence against children, necessitate the improvement of response mechanisms and interagency cooperation.

Thus, the introduction of procedures for preventing violence by the Standard Program for the Prevention of Violence and Cruelty to Children, approved by the Resolution of the Government of Ukraine No. 658 of June 4, 2025, and the Procedure for Responding to Cases of Violence and Cruelty to Children, approved by the Resolution of the Government of Ukraine No. 1513 of November 19, 2025, contributes to bringing the legislation of Ukraine into line with international standards.

At the same time, the results of monitoring visits indicate a systematic practice of violations of children's rights in the activities of subjects, as well as shortcomings in the implementation of the mechanisms for detecting and preventing violence against children in the activities of subjects, provided for by the Standard Program and Procedure for Response to Mechanisms for Detecting and Preventing Violence Against Children in the Activities of Legal Entities.

This necessitates the need to bring these documents into line with other regulatory legal acts, in particular, agreeing on uniform deadlines for responding to reports of violence, and clearly delineating the responsibilities and accountability of the entities involved.

4.2.2. Violation of the Rights of the Child in Institutions of the Care and Upbringing System of Ukraine

a) Violation of the Right to Life and Safety

The obligation to assess the safety of children and individuals staying in round-the-clock institutions is assigned to the regional and Kyiv city military administrations in cooperation with the relevant district military administrations, executive bodies of village, town, city councils (military administrations of settlements) at the place of permanent location of the institutions. Such an assessment should include an analysis of information from other responsible entities, take into account the distance to economic entities important for the national economy and defence of the state, as well as the distance from the institution to the administrative border between the TOTs and other territories of Ukraine where there are no hostilities, the contact line, the state border of Ukraine with

the Russian Federation and the Republic of Belarus. An important aspect of assessing the safety of children staying is verifying the availability and condition of civil defence structures, dual-purpose structures suitable for sheltering children and individuals.

However, the Secretariat of the Commissioner continues to record cases in which responsible regional military administrations ignore the results of the assessment of the safety of children and individuals in institutions and do not take measures to transfer children when such transfer should be carried out on a mandatory basis.

During the monitoring visit to the Kremenchuk Regional Specialized Children's Home, it was established that the existing civil defence protective structures are not capable of fully providing shelter for all children and employees, and are also in poor condition. It was also established that there are potential risks of man-made or military emergencies.

As a result of responding to the Commissioner's submission, the Poltava Regional Military Administration reported the start of repair work in the shelter, but did not take measures to temporarily relocate children.

In order to respond appropriately, the Commissioner sent an appeal to the Prime Minister of Ukraine to coordinate the activities of executive authorities and terminate the detention of the children of the Children's Home in conditions of constant direct threat to life and health. Based on the results of the measures taken, the Poltava Regional Military Administration took measures to temporarily relocate (evacuate) children.

b) Violation of the Right to Protection and Care, Growing Up in a Family Environment

One of the manifestations of the violation of the child's right to protection and care, which is systemic in nature, is improper maintenance of documentation regarding the child. A typical violation of document maintenance is the absence in the child's personal file of documents stipulated by the Procedure for Maintaining the Personal File of an Orphan Child, a Child Deprived of Parental Care, and the form of an individual plan for social protection of a child in difficult life circumstances, an orphan child and a child deprived of parental care, as well as documents confirming the need for the child to be placed in an institution.

It should also be noted that there have been repeated cases where individual plans for social protection of a child in difficult life circumstances, a child left without parental care, an orphan child, a child deprived of parental care are overdue, require revision and adjustment, or are absent altogether.

The lack of up-to-date health reports and individual rehabilitation programs (for children with disabilities) puts the child's safe and full development at risk, as their needs are not taken into account. Inadequate recording of the child's departure, the lack of up-to-date data on the person to whom the child was transferred, makes it impossible to further monitor and control compliance with the rights of such a child and prevent violations against them.

Improper document management leads to a number of other problems and abuses that lead to further violations of the child's rights. In particular, the failure of responsible social welfare institutions to take measures to place children in family forms of upbringing leads to non-compliance with the terms of the child's stay in institutions of the institutional care and upbringing system.

Improper document management leads to a number of other problems and abuses that lead to further violations of the child's rights. In particular, the failure of responsible SCs to take measures to place children in family forms of upbringing leads to non-compliance with the terms of the child's stay in institutions of care and upbringing system.

Monitoring groups of the Commissioner's Secretariat systematically record the practices of placing children who have the status of orphans and children deprived of parental care in educational institutions with the appointment of the head of the institution as the legal representative of the children. The problem of placing children with the appropriate status in educational institutions instead of placing them in family forms of upbringing needs to be solved by developing and increasing the capacity of family forms of upbringing.

A separate manifestation of the violation of the child's right to grow up in a family environment is the prolonged stay of children who have biological parents or legal representatives without returning on weekends or holidays. In particular, violations of the procedure for children's stay in boarding schools, failure to inform the SCs about improper fulfilment of their duties by parents or legal representatives of children, have been established.

During the monitoring visit to the Municipal Institution of the Lviv Regional Council "“Mriia” (“Dream”) Educational and Rehabilitation Centre", it was established that the registration of pupils' return to their families on weekends, as well as their visits to the institution by parents, legal representatives, relatives, and acquaintances in the current academic year, is not carried out properly. In particular, the registration log was missing from the institution. According to the explanations of the Centre's administration, the log was being filled from the beginning of the academic year, but disappeared for unknown reasons. The lack of proper registration makes it impossible to monitor the safety of children and

compliance with their right to family upbringing. Under the specified circumstances, the Commissioner sent response acts to the founder of the institution.

c) Violation of the Right to Decent Living Conditions

During monitoring visits to institutions where children are accommodated for a round-the-clock stay, monitoring groups of the Commissioner's Secretariat systematically identify violations of children's rights. In particular, facts of non-compliance with the norms of the minimum area per child are established, which leads to a failure to provide personal space and privacy.

Not all children are provided with furniture and equipment, individual clothing. Creating conditions in institutions under which children share clothing (even underwear) is a common practice.

It is critical that not all institutions of care and upbringing (in particular, centers for social support of children and families, centers for social and psychological rehabilitation of children) have minimum standards for providing children with clothing and equipment approved in accordance with the procedure established by law, which leads to different practices of providing children with necessary belongings and creates prerequisites for abuse.

However, the minimum standards available for individual institutions are objectively outdated, do not meet the needs of children and do not take into account the age, hygiene and individual needs of the child, in particular regarding the frequency of changing bed linen, wear and tear of things and the needs in a safe and comfortable environment, which does not ensure the child's right to decent living conditions.

The boarding house of the Pishchanyi Brid Specialized School of the Kirovohrad Regional Council has violations in equipment. Simultaneous living in rooms of up to ten children was recorded, there was no place to store personal belongings, places for study and rest. Individual rooms of pupils are transitory, which does not ensure the privacy of children. In addition, the passage to the sanitary and hygienic room (which is common for pupils of different genders) runs directly through one of the living rooms. This problem leads not only to a failure to provide basic needs of students and a violation of their rights to decent living conditions, but also creates additional safety risks for children of different genders.

In order to respond to the specified violation, the Commissioner contacted the founder of the institution.

During the parliamentary control measures, a musty smell of bed linen was detected in the bedrooms of the communal institution "Antonivka Art Lyceum" of the Mykolaiv Regional Council. The mattresses and pillows, at the time of the monitoring visit, were in unsatisfactory sanitary condition – worn, stained and with traces of mold.

After sending the Commissioner's response acts to the relevant regional military administration, the institution eliminated the specified violation and provided replacement mattresses and pillows for the children.

It is important to note that the current standards for providing for children with the status of orphans and children deprived of parental care who remain (study) in educational institutions of all types on full state support provide for one child of school age, inter alia, the following: 1 pillow for a period of 8 years, 1 blanket for a period of 6 years, 1 coat for a period of 3 years, 7 pairs of underpants for a period of 1 year . The standards for providing for children of orphanages and boarding schools who need social support are as follows: 1 blanket for a period of 6 years, 1 pillow for a period of 10 years, 4 pairs of underpants and 5 pairs of socks for a period of 1 year.

The Commissioners sent a letter to the Minister of Education and Science of Ukraine regarding the analysis of the compliance of the specified standards with the legislative provision of Article 52 of the Constitution of Ukraine and their revision.

d) Violation of the Right to Education and Upbringing of the Child

One of the main types of violations of the rights of the child in institutions of care and upbringing system is an insufficiently organized educational process, as well as the detected circumstances of enrolling children who do not have special educational needs in specialized educational institutions.

According to the results of monitoring visits to children's homes, medical rehabilitation and palliative care centres for children, it was established that children enrolled in institutions of institutional care and upbringing of the health care system do not have appropriate conditions for access to preschool education. Cases of non-involvement of children in the educational process have been identified.

During the monitoring visit, it was established that the nine-year-old Kh. was placed in the Children's Home at the age of two. Despite the fact that the conclusion of the inclusive resource centre provided for the provision of correctional and pedagogical services and psychological support to the child, the administration of the institution reported that the child did not receive any educational services at the Children's Home (in particular, classes with a practical psychologist), since, according to the staff, he has a cardiological disease (heart defect). As a result of the Commissioner's response and the submission to the Khmelnytskyi Regional Military

Administration, the child's right to education and development was restored.

In the vast majority of such institutions, there is no properly organized preschool education for children. There is no information about planned classes, educational plans, reports and documents confirming the organization of the educational process in institutions.

In some institutions, educational programs are used in violation of the requirements for their adaptation to modern standards of preschool education. There is a lack of differentiation in planning activities that does not take into account age differences, individual needs and abilities of each child.

In some institutions, it was recorded that relevant specialists provide assistance to other children whose parents apply to institutions without placing their child, and only it is only in the breaks between such activities that assistance is provided to children with the status of an orphan and children deprived of parental care. In certain institutions, such positions are held by part-time employees, which leads to improper performance of their duties due to the lack of the time necessary to carry out relevant professional activities.

During a monitoring visit to the Center for Medical Rehabilitation and Palliative Care for Children in Kirovohrad Region, it was established that children who have the status of orphans and children deprived of parental care, as well as those placed in an institution on full state support, do not receive correctional and rehabilitation services at all. At the same time, the relevant services were provided exclusively to children who come to the Center accompanied by their parents.

As a result of the Commissioner's submission to the Kirovohrad Regional Military Administration, the children were provided with psychological, pedagogical and correctional and developmental services, and the administration of the institution was brought to disciplinary responsibility.

The monitoring group recorded cases when pupils of institutions had no textbooks and workbooks, as well as equipped places for conducting the educational process at all.

Regarding children with special educational needs in special education institutions, there is a systemic problem of lack of provision with books, educational materials and specialized equipment. Inadequate provision of children with the necessary resources makes it impossible to receive full-fledged educational services and negatively affects their further social adaptation.

During a monitoring visit to the Pishchanyi Brid Specialized School of the Kirovohrad Regional Council, it was found that the institution is not fully provided with textbooks: the available number of textbooks is not enough for all students, which is why children were forced to use outdated textbooks published in the years

1992, 1993 and 1997.

According to the results of the monitoring visit, the Ministry of Education and Science of Ukraine was given recommendations on taking measures to provide students and teachers with textbooks (excluding electronic ones) and manuals, taking into account the identified needs. At the request of the Commissioner, students of the educational institution were provided with appropriate textbooks.

The institutions also do not provide conditions for attending interest groups and sections. Due attention is not paid to organizing leisure activities that is age-appropriate and meets the interests of children.

e) Violation of the Right to Healthcare

During monitoring visits, violations of the children's right to healthcare were recorded. Medical care in institutional facilities is also mostly not provided properly, especially in cases of children who need additional and individualized care who are in the facilities.

Among the violations recorded are the provision of psychopharmacological drugs to children without monitoring changes in the behaviour and condition of the children, failure to follow the prescriptions of specialized doctors regarding treatment, failure to obtain proper consent from the children's legal representatives for such treatment, and the presence of expired medical drugs in the facilities.

In some cases, treatment review was carried out at the discretion of the medical staff of the facilities or by oral telephone agreement, without consulting the relevant doctor or monitoring children's health.

During a monitoring visit to a boarding school, members of the monitoring group received complaints from children about drowsiness after taking medication received at the lyceum medical centre. A review of the documentation revealed that junior medical staff had been dispensing psychopharmacological drugs to children for two months after the expiration of the prescriptions, although the children reported feeling unwell. According to the medical staff, they had been prescribing drugs by telephone agreement with the doctor. The lyceum administration had not taken any measures to have the children re-examined by a child psychiatrist, in particular to adjust the treatment based on their health status.

In response to the Commissioner's submission, a re-examination by a child psychiatrist was provided and the treatment was adjusted.

In most cases identified during monitoring, psychotropic drugs were stored in institutions without proper legal grounds, and medical care for children was provided by

institutions despite the lack of an appropriate license to conduct business activities in medical practice.

At the Municipal Institution of the Lviv Regional Council "Mriia" ("Dream") Educational and Rehabilitation Centre", the monitoring group identified circumstances in which children were given prescription drugs of the psychopharmacological group not only in the absence of a license to conduct business activities in medical practice, but also without the appropriate doctor's prescriptions and parental consent. The Centre's staff explained that the medication is dispensed at the oral request of the parents, and the duration of the dispensing of medications, their volume and dosage are determined at their own discretion. These circumstances do not ensure the proper implementation of a child's right to health care.

During a monitoring visit to the Centre for Medical Rehabilitation and Palliative Care for Children, a drug with the active ingredient diazepam, which is a tranquilizer, was found in public access. The storage and alleged use of tranquilizers during the organization of treatment of children was carried out without obtaining an appropriate license and violated the requirements of the Law of Ukraine "On Narcotics, Psychotropic Substances and Precursors" and the Procedure for Conducting Activities Related to the Circulation of Narcotics, Psychotropic Substances and Precursors, and Control over Their Circulation. The Commissioner sent a submission to the Office of the Prosecutor-General regarding the improper organization of treatment of children.

It was also discovered that the majority of specialized schools and educational and rehabilitation centers, other educational institutions with boarding houses provide medical services to children without obtaining a license to conduct medical practice, which is a violation of Article 7 of the Law of Ukraine "On Licensing of Types of Economic Activities". The absence of contracts with health care institutions for medical services was also revealed; the use of psychopharmacological drugs without proper control; the practice of initiating psychiatric examinations and hospitalization of children without sufficient legal grounds; the use of hospitalization of children in psychiatric hospitals as an instrument of punishment. It is extremely important to organize access to health care services for children placed in institutions of various forms of ownership for 24-hour stay within the framework of the NHSU.

In course of a monitoring visit to the Centre for Medical Rehabilitation and Palliative Care for Children in Kirovohrad Region, a gross violation of the rights of a 5-year-old child with HIV-positive status and disability was discovered. The minor

patient was given an expired drug that was used for antiretroviral therapy. This posed a direct threat to the child's life and health and could have serious consequences. After the violation was discovered, a letter was immediately sent to the Kirovohrad Regional Military Administration with a demand to resume the child's life-saving treatment. Thanks to the Commissioner's intervention, the therapy was resumed the next day, and the regimen for receiving antiretroviral therapy was adjusted.

In order to respond to the violation, the Commissioner appealed to the Office of the Prosecutor-General, and criminal proceedings are ongoing. Disciplinary sanctions were applied to the management of the institution and medical staff.

4.2.3 On the Violations of the Rights of Children Temporarily Displaced (Evacuated) Outside Ukraine

According to the NSSU, 4,811 children enrolled in institutional care facilities have been temporarily relocated (evacuated) for the period since February 24, 2022. As of December 31, 2025, **3,469 children** of this number were returned to Ukraine, **1,342 children** remain temporarily relocated (evacuated) outside Ukraine. The results of monitoring visits carried out in 2025 showed that violations of the rights of temporarily relocated (evacuated) children identified during previous monitoring visits have not been eliminated and remain systemic.

This includes, in particular, inadequate living and educational conditions for children, limited access to medical, rehabilitation, psychological and social services, separation of children from family groups, restrictions on the powers of accompanying persons and legal representatives, as well as individual violations of the requirements of national legislation and international standards.

During the visit to the Republic of Lithuania, circumstances of separation of the family group during temporary relocation (evacuation) were revealed. In particular, one child was evacuated to Vilnius, and two others - to Kaunas. Accordingly, the children did not have the opportunity to communicate and maintain contact. This situation made it difficult to maintain stable social contacts developed within the family group, and negatively affected the psychological state of the children.

Based on the results of the monitoring visit, the Commissioner addressed the Ministry of Social Policy with relevant letters of response.

In course of the monitoring visit to the Kingdom of Spain, it was established that temporarily displaced (evacuated) children were left unaccompanied, and the relevant children's services do not carry out appropriate activities regarding their placement in family forms of upbringing. Thus, 37 pupils of the Mykolaiv branch of the Paraskoviivka Specialized School No. 40 of the Donetsk Regional Council, who have the status of an orphan or of children deprived of parental care, have been in a boarding school for more than three years. This violates the child's right to upbringing in conditions close to family ones.

The Commissioner sent a report on the results of the monitoring visit to the Ministry of Social Policy, the State Children's Service, and the National Social Service. In addition, upon the Commissioner's appeal to the National Police of Ukraine, criminal proceedings were initiated under Article 367 of the Criminal Code of Ukraine.

In course of the monitoring visit to the Federal Republic of Germany, it was established that in the Educational And Rehabilitation Center No. 21 of the Obolonskyi district of Kyiv, a violation of the child's right to citizenship was detected, namely the inaction of authorized persons to obtain a passport of a citizen of Ukraine for a child who has reached the age of 14, as well as a passport of a citizen of Ukraine for traveling abroad, if required.

Based on the results of the monitoring visit, the Commissioner provided recommendations to the Ministry of Foreign Affairs, the State Migration Service of Ukraine and the "Dokument" State Enterprise to resolve the issue of ensuring that temporarily displaced (evacuated) children receive passports of a citizen of Ukraine.

In addition, during a monitoring visit to the Federal Republic of Germany, facts of sexual violence against children by other pupils were revealed, as well as the concealment of these facts by the staff and management of the institution.

This indicates inadequate interaction and coordination of actions by the Ministry of Social Policy, the SSUCR and the NSSU with the regional military administrations regarding the adoption of effective measures to protect the rights of children, in particular their return to family forms of upbringing in safe territories of Ukraine.

4.2.4. Problems of Pupils of Specialized Institutions Evacuated Abroad

In course of the parliamentary control, the Commissioner identified systemic difficulties in ensuring access to consular and notarial acts for pupils of specialized institutions evacuated abroad in connection with the full-scale armed aggression of the Russian Federation against Ukraine. These include, in particular, persons with

disabilities, orphans, children deprived of parental care, as well as adults who were in inpatient institutions of the social protection system.

The current legislation provides for privileges regarding the payment of consular fees for notarial acts abroad for certain vulnerable categories of persons. In particular, the Law of Ukraine No. 4170-IX of December 19, 2024 supplemented Article 38 of the Law of Ukraine "On Notaries" with a provision according to which the consular fee shall not be charged for certifying the correctness of the translation into Ukrainian of documents necessary for sending a person for an assessment of daily functioning. The aforementioned innovation partially resolved the issue of financial accessibility of notarial acts for evacuated pupils of specialized institutions.

At the same time, the practice of applying the legislation shows that the formal exemption from paying the consular fee does not eliminate other significant barriers to access to services. Such barriers include the complexity of procedures, the need to collect a significant number of documents, etc.

The MFA, in its responses to the Commissioner's appeals, noted that the issue of simplifying access to consular and social benefit procedures for vulnerable categories of citizens requires a comprehensive interagency settlement with the active use of digital tools. At the same time, the MFA noted that the formation of policy in the field of social protection falls within the competence of the MSP, which should initiate relevant legislative changes.

Despite some positive steps, as of the end of the reporting period, a comprehensive regulatory and institutional mechanism that would take into account the specific needs of evacuated pupils of specialized institutions had not been introduced. The lack of a coordinated approach between executive authorities leads to situations where individuals with the highest level of vulnerability remain restricted in exercising their right to access documents and social guarantees, which creates risks of legal and social isolation abroad.

4.3. Ensuring the Return of Orphans and Children Deprived of Parental Care from Abroad to Ukraine by Executive Authorities and Local Self-Government Bodies

According to the United Nations Children's Fund (UNICEF), as of the end of 2025, more than a third of Ukrainian children, namely 2,589,900, remain forcibly displaced as a result of the war, among them almost 1,798,900 reside abroad as refugees.¹⁹

¹⁹ <https://www.unicef.org/ukraine/press-releases/more-third-ukraines-children-remain-displaced-four-years-war-unicef>

A sensitive issue in the context of full-scale Russian armed aggression remains the return to Ukraine of children taken away from their parents, relatives or legal representatives by the authorities of the host country.

Mostly, the guardianship and trusteeship bodies at the place of origin of children in Ukraine are not aware of the fact that children are left without parental care in foreign countries. This complicates the process of returning a child to Ukraine and may lead to cases of leaving a child outside the control of the state.

The Resolution of the Government of Ukraine No. 569 of April 23, 2003 approved the Procedure for the Return to Ukraine of Children Deprived of Parental Care Who Are Citizens of Ukraine (hereinafter referred to as the Procedure No. 569). The specified procedure establishes an algorithm of actions for the return from abroad of orphans, children deprived of parental care, or those who are outside Ukraine for various reasons.

Item 10 of the Procedure No. 569 establishes that the return of a child to Ukraine is ensured at the expense of state budget expenditures provided to executive bodies for the relevant year.

At the same time, during the processing of appeals from citizens of Ukraine for assistance in the return of children from abroad, it was revealed that executive bodies do not provide funds from the state budget for the return of children to Ukraine for the relevant year.

The mechanism for calculating expenditures for the return of children to Ukraine and their accompanying persons has not been developed, which makes it impossible to properly form a budget request for the purpose of including the specified expenditures in the state budget. Accordingly, executive bodies cannot use this tool to implement measures related to the return of Ukrainian children from abroad.

The Podilskyi District State Administration in Kyiv asked the Commissioner to assist in the return of a three-year-old citizen of Ukraine from Egypt.

The boy was left without parental care in a foreign country and, by decision of the local prosecutor's office, was temporarily placed with the family of a Ukrainian citizen living there. The family was waiting for the child at home.

As a result of the coordinated work of the Commissioner, the employees of the Commissioner's Secretariat took measures to search for partners to ensure logistics; return the boy to his family; prepare the necessary documents; work out the route for the child's return to Ukraine; assist in registering custody of the child.

Despite the existing problems, under martial law, guardianship and care bodies continue to return children from other states in accordance with Procedure No. 569 using alternative sources of funding.

For example, in Zakarpattia region, a Regional Program for Ensuring the Rights of the Child to Grow Up in a Family Environment for 2026-2030 has been developed, which establishes that from 2026, funds are provided for the return to Ukraine of children deprived of parental care who are citizens of Ukraine in the amount of UAH 50,000 per month. Thus, in 2025, three children deprived of parental care from Zakarpattia region were returned to the territory of Ukraine.

The use of local programs as a tool for implementing measures provided for by the Procedure is also being used in Vinnytsia region. In 2025, the Shpykiv village council of Tulchyn district of that region received information about a child abandoned in a maternity hospital in Poland, who is under the temporary care of a Polish family. The SC of the above-mentioned community is taking measures to ensure the legal return of the child to the territory of the community, while none of the relatives who are in the territory of the community have expressed a wish to take the child to the family. In order to return the child, the village council made amendments to the Community for Children Program for 2024-2028 to finance activities in accordance with Procedure No. 569.

In Cherkasy region in 2025, return activities were carried out with the assistance of charitable organizations and the budget of communities. Thus, according to the Cherkasy Regional Military Administration, within the framework of Procedure No. 569, 4 children who are citizens of Ukraine, left without parental care and were on the territory of the Republic of Kazakhstan, were returned to the Zhashkiv territorial community and were placed in a family-type children's home.

In general, according to the data provided by the regional and Kyiv city military administrations, for the period from 2022 to 2025, 31 children were returned to the communities of Cherkasy, Kyiv, Rivne, Zakarpattia, Zaporizhzhia regions and the city of Kyiv within the framework of Procedure No. 569. At the same time, with a view to the importance of the issue of the return of each Ukrainian child to Ukraine, the lack of a developed mechanism for expenditures for the implementation of measures provided for by Procedure No. 569 complicates the return process and significantly limits the ability of guardianship and trusteeship bodies to carry out measures within the framework of the aforementioned Procedure.

4.4. Right of the Child to Education

4.4.1. Situation Regarding the Right of the Child to a Safe Educational Environment

(a) Operation of General Secondary and Preschool Education Institutions in Conditions of Armed Conflict

The right to education, guaranteed by Article 53 of the Constitution of Ukraine and Article 28 of the 1989 Convention on the Rights of the Child, is one of the fundamental rights of the child, which contributes to the full development of their mental and physical

abilities. During the full-scale armed aggression of the Russian Federation against Ukraine, ensuring the right to education and the continuity of the educational process by the state remains a pressing issue.

In 2019, Ukraine joined the Safe Schools Declaration (hereinafter referred to as the Declaration), becoming the hundredth country to sign this document. This document forms a number of obligations related to the prevention of and response to attacks, as well as the issue of the use of educational institutions for military purposes during armed conflict.

The Government of Ukraine, by Order No. 898-p of August 4, 2021, approved an Action Plan for the implementation of the Declaration on School Safety, which contains components with measures to implement an effective system for monitoring attacks on educational institutions, protecting educational institutions from attacks and restoring them in case of damage, ensuring continuity of education, and systematic approaches to protecting education in conditions of armed conflict.

With the beginning of the full-scale invasion of the Russian Federation, Ukraine demonstrated its commitment to individual provisions of the Declaration, in particular, the continuation of the educational process, the adaptation of the educational environment to the conditions of a full-scale war, as well as informing international partners about attacks on education in Ukraine during an international armed conflict.

Of special interest are the decisions on the organization of the educational process in the so-called "underground schools". For example, in the city of Kharkiv, "metro schools" have been organized on the basis of metro stations, where classrooms are equipped for training, to which secondary education institutions are assigned. Another example is the construction of educational institutions that are completely or partially underground.

However, the existing technical requirements for premises, as well as for the organization of the educational process, cannot be applied to studies in the so-called "underground educational institutions". Appropriate regulatory and legal regulation should be implemented to develop and apply unified approaches to the construction, arrangement and provision of educational services in such conditions.

While addressing the challenges of wartime, a number of commitments to ensure the safety of the educational environment remain unfulfilled or partially fulfilled. Data collection on attacks on educational institutions focuses on damage to infrastructure without covering attacks on participants in the educational process, suspension or absence of educational process, and long-term consequences.

As for the available statistics, the collected data indicate that Russia continues to carry out attacks on civilian infrastructure, destroying and damaging preschool, general secondary, pre-university and other types of institutions.

According to the regional military administrations, since the beginning of the full-scale Russian armed aggression against Ukraine as of December 31, 2025, 397 educational institutions have been destroyed and 4,010 have been damaged as a result of military actions.

This threatens the safety of children's lives and health during the educational process, which, as a result, disrupts its continuity. Systematic destruction and damage by the aggressor state to civilian infrastructure requires the implementation of a mechanism that allows for prompt reporting of damage to an educational institution in the context of armed conflict, as provided for in Measure 2 of the aforementioned Plan.

A larger number of damaged and destroyed educational institutions can be observed, primarily, in regions bordering areas of active hostilities and territories that were temporarily occupied by the Russian Federation - Dnipropetrovsk, Donetsk, Kharkiv, Kherson, Kyiv, Mykolaiv, Sumy, and Zaporizhzhia regions. This requires increased attention to the arrangement of safe learning spaces in the communities of the aforementioned regions.

The needs of education seekers who have survived attacks on schools, or those who are often in anxious conditions in shelters during notifications of air alert, remain unmet at the proper level. It is important to ensure safe routes to school and proper conditions for the educational process of children in accordance with their number and needs.

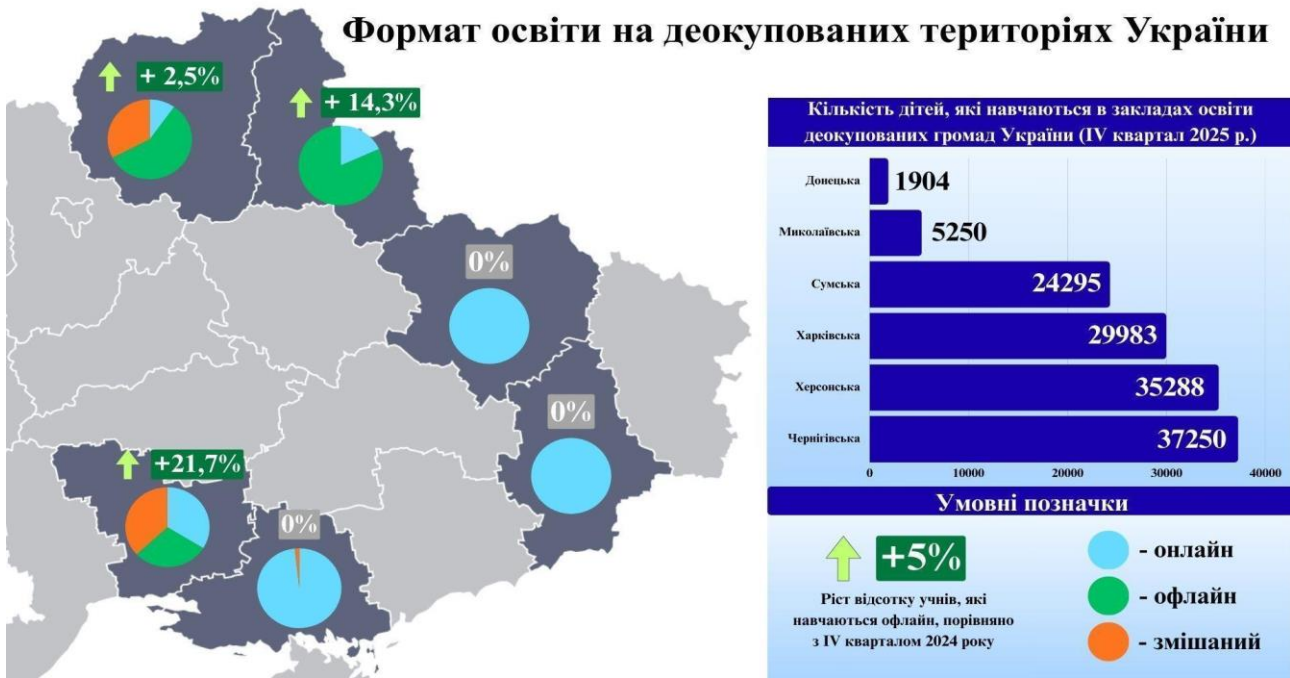
Pursuant to Item 11 of the Action Plan for the Implementation of the Declaration, by Order of the Minister of Education and Science of Ukraine No. 1080 of October 12, 2021, an Interdepartmental Working Group for the Implementation of the Declaration (hereinafter referred to as the Group) was established. Through the period of the Group's operation, only one founding meeting was held on December 3, 2021 to discuss the current state of education protection from attacks in the East of Ukraine. There is also no publicly available reporting information on specific measures taken by responsible entities to implement the goals of the Declaration.

The activation of the aforementioned Group is necessary to accelerate the implementation of the goals of the Declaration in accordance with the Action Plan and operational interdepartmental interaction on damage and destruction of educational institutions during the armed conflict, strengthening the security of the educational process, and responding to cases of harm to students during the armed conflict.

Under martial law, the territories of the de-occupied territorial communities have mostly introduced remote and mixed formats for providing educational services.

It is worth noting the positive dynamics of the ratio of the number of students in secondary education institutions studying in in-person, mixed or remote formats on the territories of the de-occupied communities of Ukraine. The diagram below shows the ratio of the format of education in secondary education institutions in the de-occupied communities of Ukraine:

Формат освіти на деокупованих територіях України



(b) Psychological Service and Socio-Pedagogical Patronage in the Education System

During visits to educational institutions in different regions of Ukraine, violations are systematically identified in the field of providing psychological support, socio-pedagogical support and violence prevention.

In a significant part of educational institutions, the activities of practical psychologists and social educators do not meet the requirements of current legislation and professional standards. During the monitoring, it was revealed that:

- prevention of bullying and violence is mostly limited to information stands or individual trainings without systematicity, monitoring of effectiveness and reporting;
- interdepartmental coordination between the psychological service, the institution's administration and pedagogical workers is not ensured, which makes it impossible to identify cases of violence, cruel treatment or discrimination on time;
- there are no work plans for a practical psychologist, individual plans for psychological support for children with special educational needs, results of psychodiagnostics and questionnaires;
- the documentation provided for by the Regulations on the Psychological Service in the Education System of Ukraine, approved by the Order of the Ministry of Education and Science of Ukraine No. 509 of May 22, 2018, is not maintained;

- work with children with special educational needs covers the needs of the child only partially, there is no individual approach, individual development programs are not developed or implemented;

- there are no individual workplaces for practical psychologists and social educators.

The lack of approved internal documents, in particular the Regulations on the Prevention and Counteraction of Violence, mechanisms for responding to cases of bullying and violence, as well as the lack of anonymous channels for reporting such cases, is also often recorded.

The results of monitoring visits to general secondary education institutions have revealed the inadequate functioning of psychological services within these establishments. An insufficient level of psychological support, the absence of preventive work, and a lack of proper documentation regarding the activities of psychological services lead to violations of a child's right to mental health. These deficiencies fail to meet the requirements for a safe educational environment and adequate protection against all forms of violence.

It should be noted that, according to the Typical Staffing Standards for General Secondary Education Institutions, rural schools with up to 99 students are allocated only 0.25 of a psychologist position, while a full position (1.0) is provided only when there are 300 students. In urban areas, similar standards provide for 0.5 of a position for up to 499 students, with a full position (1.0) granted only at the level of 700 students.

This ratio effectively creates a critical overload as student numbers increase, limiting the ability of practical psychologists to ensure systematic work on bullying prevention, individual child support, and the provision of psychological assistance. These findings necessitate a revision of the standards and a reduction in the approved required minimum number of students.

(c) Violation of the Right of the Child to Respect for the Child's Dignity and Protection from Abuse and Violence by Participants of the Educational Process

The focus of the Commissioner's Secretariat is the issue of protecting children from all forms of violence, including appropriate control over participants in the educational process. In particular, in 2025, the Commissioner received **191 appeals** regarding bullying cases. Compared to 2024, the number of such appeals to the Commissioner regarding bullying cases increased by 55 percent.

Following the Commissioner's response to cases of bullying of participants in the educational process, law enforcement agencies opened 12 criminal proceedings on the facts of intentional infliction of minor, moderate and serious bodily injuries, beatings and torture, improper performance of duties to protect the life and health of children, rape, and violation of privacy.

An important aspect of protecting participants in the educational process from violence and abuse, in particular bullying (harassment), is the introduction in the CoAO of Ukraine of administrative liability for cases of violence and abuse that are not subject to criminal liability, as well as unifying the definitions of the term "bullying (harassment)" in the CoAO of Ukraine, the Law of Ukraine "On Childhood Protection" and the Procedure for Responding to Cases of Bullying (Harassment), approved by the Order of the Ministry of Education and Science of Ukraine No. 1646 of December 28, 2019, which will ensure the elimination of discrepancies and a uniform legal approach to responding to such cases.

According to the National Police of Ukraine, in 2025, **285 protocols** on administrative offenses were drawn up under Article 1734 of the CoAO of Ukraine, in relation to **248 persons**. The courts considered **213 cases** of bullying. At the same time, it is worth noting that court cases on bullying are closed by the courts due to the expiration of the terms for imposing administrative penalties, since the period established by law during which a person (offender) can be brought to administrative responsibility expires. This leads to the avoidance of responsibility by offenders and creates prerequisites for violations.

It should be noted separately that as a result of the consideration by the Commissioner of citizens' appeals in the context of responsibility for bullying and violence against children, authorized entities drew up protocols on administrative offenses in relation to **22 persons** (including **2 children**). At the same time, the contested actions by the bodies of the National Police of Ukraine were qualified not only as bullying. In particular, protocols were drawn up on the facts of petty hooliganism, failure of parents or persons replacing them to fulfil their obligations to raise children. Disciplinary sanctions were also applied to **34 persons**, in particular reprimands were applied to **21 persons** (including **3 police officers**) and warnings were applied to **4 persons**, while **3 persons** were dismissed from their positions based on the results of the Commissioner's response.

A resident of Cherkasy region applied to the Commissioner. In her application, she requested protection for her child with special educational needs, who required an inclusive environment but had faced undignified treatment from a teacher at a general secondary education institution.

During the proceedings, it was revealed that the commission for investigating cases of bullying confirmed the facts of harassment.

The information obtained within the framework of the Commissioner's proceedings was forwarded to law enforcement agencies. Police officers filed an administrative offense report against the teacher in connection with the bullying of

the child and referred the materials to court. Based on the results of the case review, the court found the teacher guilty of committing an administrative offense.

It should also be noted that the head of the educational institution imposed a disciplinary penalty on the teacher in the form of a reprimand. Currently, the teacher has been dismissed from their position.

Regarding trends in the described violations of the rights of participants in the educational process, the Ministry of Education and Science has reported that the collection and summarization of the number of bullying cases in educational institutions is not carried out. At the same time, the increasing number of bullying incidents among children in educational institutions may indicate insufficient effectiveness of response measures taken by school administrations, authorized units of the National Police of Ukraine, relevant local educational authorities, and the Ministry of Education and Science as the central executive body.

The increase in the number of appeals to the Commissioner regarding bullying among participants in the educational process does not necessarily indicate a factual increase in such cases. However, the results of the analysis of these appeals provide grounds to assert systemic violations of the requirements of the Procedure for Responding to Cases of Bullying (Harassment), approved by Order of the Ministry of Education and Science No. 1646 of December 28, 2019. This necessitates the establishment of a body authorized to monitor compliance with those requirements by the responding entities.

It is advisable to continue systematic information work, enlightenment, training, and education to develop response skills among all entities obligated to react to bullying. Additionally, a specific task is to foster "zero tolerance" toward bullying among all participants in the educational process, as outlined in the National Strategy for the Protection of the Rights of the Child in the Justice Sector for the Period until 2028, approved by the Resolution of the Government of Ukraine No. 708-p of July 14, 2025.

The Commissioner received an appeal from the father of a five-year-old boy regarding the violation of child rights in a preschool education institution. Every day, when picking up their son from the kindergarten, the parents noticed new bruises and an increasing reluctance of the child to return to a place where care and safety should have prevailed.

In course of the Commissioner's proceedings, it was revealed that the educator not only held a biased attitude toward the boy but also incited other children to hit him. The bullying review commission recorded signs of bullying. A disciplinary

sanction in the form of a reprimand was applied to the employee. Subsequently, the educator was dismissed from their position.

Furthermore, violations regarding the operation of the commission were identified in the performance of the head of the educational institution, for which they were also issued a reprimand.

(d) Violation of the Right of the Child to Personal Data Protection in the Activities of Educational Institutions

The Secretariat of the Commissioner has, based on the results of 107 non-on-site monitoring visits, verified a systematic violation of the child's right to protection of personal data from unlawful processing by secondary education institutions. In particular, it was established that educational institutions, when organizing their activities, ensured the publication of internal documents (orders, instructions, memos, as well as public reports and announcements) that contained an excessive amount of sensitive information - children's surnames and first names, dates of birth, addresses of residence, information about children belonging to military families.

During non-on-site monitoring visits, it was revealed that 107 secondary education institutions publicly disclosed information that contained an excessive amount of personal data of students. Such a volume of published data is unjustified and does not meet the goals of their dissemination specified by law. In conditions of martial law, uncontrolled posting of such information creates additional risks for the safety of children and may lead to actual violation of their rights and interests.

Following the Commissioner's response, educational institutions eliminated the identified violations: excessive personal data was removed, and access to sensitive information was restricted. As a result, the rights of 4,070 children were restored, and personal data processing practices were brought into compliance with legislative requirements.

4.4.2. Violation of the Rights of a Child with Special Educational Needs to Education

Ensuring the right of a child with special educational needs to education is one of the key responsibilities of the state and the basis for the formation of an inclusive and equal educational environment.

According to the Ministry of Education and Science, there are currently **723 IRCs** operating. In 2024, **83,552 applications** were submitted to such centres and **82,500 conclusions** were issued. At the same time, in 2025, **86,760 applications** were submitted and **84,894 conclusions** were issued. The above indicates an increased need for a comprehensive psychological and pedagogical assessment of children's development. The increase in the number of applications in 2025, compared to 2024, indicates an actualization of the role of IRCs in the system of supporting children with special educational needs.

Considering that the Commissioner continues to receive applications regarding the violation of the right of a child with special educational needs to education, a request was sent to the Ministry of Education and Science in order to obtain generalized information on the number of children with special educational needs, as well as the number of experts working with such children.

The response shows that the number of children with special educational needs is 136,871 (**72,392 PEIs; 64,479 GSEIs**), while the number of specialists providing educational and psychological and pedagogical support to such children is 42,123 (**0 PEIs; 42,123 GSEIs**). At the same time, there is no information regarding the child assistants.

During monitoring visits to determine the status of compliance with the rights of children with special educational needs, it was found that not all educational institutions use the conclusions of comprehensive psychological and pedagogical assessments of children's development. The absence of conclusions may indicate a failure to take into account the characteristics and dynamics of children's development, the features of mastering the educational program (its individual educational components), the need for an individual curriculum, adaptation/modification of the content of educational subjects (integrated courses), the provision of psychological and pedagogical, correctional and developmental services (assistance) required by students with special educational needs.

A typical shortcoming in the activities of special education institutions is the absence of an individual development program for each student or its formal filling. In particular, individual student development programs, as a rule, do not contain complete information.

There is a problem of non-involvement and proper organization of the activities of experts who can provide individual support to children with special educational needs, in particular speech therapists, psychologists and correctional teachers. This indicates the lack of proper staffing for working with children with special educational needs in the education system.

In order to analyse the dynamics of the number of students in the field 016 "Special Education", as well as the number of graduates in this specialty, which directly affects the level of staffing of educational institutions and the system of providing support to

children with special educational needs, a corresponding analysis of indicators for 2024-2025 was carried out in accordance with the information provided by the Ministry of Education and Science.

Thus, the number of HEIs that train specialists in the field 016 "Special Education" is 44. Currently, **7,601 students** (Master's, Bachelor's) are studying in the field "Special Education", of which **2,773 students** are studying on the basis of state financing. At the same time, the number of HEI graduates in 2025 who received higher education in the field "Special Education" is **2,932**.

This indicates limited opportunities for staffing the system of special and inclusive education. Despite the significant number of HEIs that provide training in the field 016 "Special Education", the number of students and graduates does not fully meet the needs of educational institutions and the system of support for children with special educational needs. The data obtained highlight the need to strengthen state support for the training of such specialists and improve personnel policy in the field of education.

A resident of Zakarpattia region appealed to the Commissioner regarding the alleged violation of the right of a child with special educational needs to receive education in a lyceum due to the absence of a child assistant and a teacher's assistant.

During the consideration of the appeal, inquiries were sent to the founder of the educational institution. As a result, the child was provided with an assistant who provides social support; the educational institution now also has a teacher's assistant who helps in organizing the educational process, adapting educational materials, and monitors the child's development.

4.5. Right of the Child to Healthcare

The right of the child to health care, medical assistance and medical insurance is guaranteed by the Constitution of Ukraine, in particular Article 49, as well as Article 24 of the 1989 Convention on the Rights of the Child.

Access to medical services is one of the basic needs that must be ensured in communities affected by the armed aggression against Ukraine. According to the MoH, as of December 1, 2025, damage or destruction of **2,535 facilities**, which are included in **816 medical institutions**, was confirmed. In total, **327 facilities**, which are included in **125 health care institutions**, were completely destroyed as a result of shelling. The most affected were medical institutions in Donetsk, Kharkiv, Dnipropetrovsk, Kherson, Zaporizhzhia and Luhansk regions.

Furthermore, since the beginning of the full-scale invasion, 280 emergency medical vehicles have been destroyed, 170 have been damaged, and 80 have been captured by Russian troops.

Medical assistance is provided at 1,532 facilities, another 185 are partially operational, 232 facilities have been evacuated, and 572 facilities are not functioning. At the same time, despite daily threats, the restoration of medical facilities continues: 700 facilities have been rebuilt already, another 323 have been restored partially. At the same time, 59 facilities that were restored were damaged again.

4.5.1. Providing Children with Orphan Diseases with Necessary Medicines and Dietary Nutrition

Currently, the issue of providing children with rare (orphan) diseases with necessary medicines and dietary nutrition requires additional attention, given the increase in the number of children with rare orphan diseases in 2025 compared to 2024, which was reported by the MoH in response to inquiries.

Given the number of cases of children with rare orphan diseases and the complexity of their treatment, there is a need to increase funding from the state budget to cover the costs of medical institutions specializing in providing appropriate qualified medical care to such children.

The Commissioner receives applications from parents of children with rare (orphan) diseases regarding the violation of their right to proper and timely medical care due to the inability to receive expensive medicines that are vital for the treatment of the child, as well as dietary nutrition, free of charge. The use of other drugs with a similar active ingredient does not provide a therapeutic effect due to the specifics of the course of rare (orphan) diseases.

Since the problem of providing such children with appropriate medicines by the MoH has not been resolved, parents are forced to travel abroad and address specialized clinics for the treatment of their children.

In addition, since drugs that provide a therapeutic effect are not included in the National List of Medicines and the Register of Wholesale Prices for Medicines, this makes it impossible to purchase them from local budgets. It should be noted that drugs and food products included in the National List of Medicines must be purchased from the state and local budgets. However, the needs of children suffering from rare (orphan) diseases are not fully met.

The applicant addressed the Commissioner regarding the violation of the right of her child, who suffers from a rare orphan disease, to necessary medical care. In the appeal, the applicant reported that it was impossible to obtain a vital medical drug for the child's treatment in a health care facility.

The applicant reported that her child was denied the provision of necessary medications at the expense of budget funds within the framework of financing the territorial community, since the medical drug prescribed for the treatment of the disease is not included in the list of essential medicines approved by the Resolution of the Government of Ukraine No. 333 of March 25, 2009.

In course of the proceedings, the Commissioner found out that health care facilities may purchase medicines that are registered in Ukraine in accordance with the procedure established by law, but are not included in the specified List, if the necessary medical drug is included, in particular, in clinical protocols approved by the MoH. Since the clinical protocol for treating the applicant's child's illness was approved by order of the MoH, this made it possible to purchase the necessary medical medication for the child from local budgets.

According to the results of the Commissioner's response, the budget of one of the territorial communities of the Dnipropetrovsk region provided and allocated funds for medications to provide care for patients with orphan diseases in the amount of 11.47 million from the city budget for 2025, including the medication that the applicant's child needed.

The issue of providing dietary nutrition to children suffering from rare (orphan) diseases also remains relevant. During the proceedings on citizens' appeals, it was established that parents have to purchase special dietary nutrition for their children at their own expense.

The volume of special nutrition purchased at state expense is not enough to fully meet the needs of children.

To address the issue of protecting the right of children to health care and medical care, the Commissioner recommended that the MoH ensure the introduction of maintenance and generalization of quantitative indicators regarding children suffering from rare (orphan) diseases and their needs for special dietary nutrition and medicines.

4.5.2. Right of the Child to Receive Psychiatric Assistance

Despite the declared course of reforming the psychiatric care system, in particular its humanization and orientation towards respecting human rights and the rights of the child, the results of monitoring visits indicate the persistence of systemic violations in the activities of institutions providing psychiatric care.

The most common violations in the activities of such institutions are the unjustified and prolonged use of physical restraint (fixation), the actual isolation of children in wards, the deprivation of the opportunity to use a mobile phone (or other means of

communication) without proper medical indications, decisions of a psychiatrist, documentation and informing the child's legal representatives.

The Secretariat of the Commissioner received complaints from children about their placement in psychiatric institutions unfoundedly - as a means of punishment. Monitoring confirmed that the descriptions of the mental state of individuals, set out during the initial examination and in the diaries of medical observation, do not contain clinical symptoms and manifestations of mental disorders that could be grounds for providing inpatient psychiatric care.

For example, during a visit to the Lviv Regional Clinical Psychiatric Hospital, it was established that in 92 cases, hospitalization of wards of institutional care and upbringing facilities was carried out without complying with the requirements of the law, and psychiatric care should have been provided without placing children in a psychiatric hospital.

Similar violations were identified during a visit to the Ternopil Regional Psychoneurological Hospital. In particular, similar violations were identified in 97 cases of hospitalization of wards of institutional care and upbringing facilities. There have also been more than 30 recorded cases of children being placed in the specified institution without proper consent for hospitalization.

For each of the identified cases, a statement of criminal offenses was filed, official investigations were initiated, and response acts and recommendations were sent to the MoH and regional military administrations.

In order to respond to these violations, the Government decided to provide inpatient psychiatric care for children funded by the NHSU only in multidisciplinary children's hospitals - in order to reduce the risk of stigmatization of the child, and to provide a more comprehensive nature of the provision of services.

However, the results of subsequent monitoring visits to the newly established psychiatric departments indicate that the transfer of psychiatric care to multidisciplinary children's institutions in itself did not eliminate systemic violations.

The most common problems remain: lack of proper control over the legal and medical grounds for hospitalization of children; making decisions on hospitalization and the application of restrictive measures without the participation of a psychiatrist; formal or fictitious nature of obtaining voluntary consent; unjustified and prolonged use of physical restraint (fixation) without medical indications thereto, documentation and informing the child's legal representatives; shifting key decisions to middle and junior medical staff, thereby going against the requirements of the legislation and international standards in the field of children's rights.

Of particular concern is the pro forma control over the reasons for hospitalization of children in psychiatric wards, as well as the delegation of key decisions on the application of restrictive measures to middle or junior medical staff, which contradicts the requirements of current legislation and international standards. Hospitalization of children in psychiatric care institutions, in most of the identified cases, is carried out without the participation of a psychiatrist, while the legislation clearly stipulates that the decision on hospitalization in a psychiatric institution should be made exclusively by a psychiatrist.

The monitoring group found a child K., born in 2009, in a closed ward of the psychiatric department of the municipal non-profit enterprise "Regional Clinical Children's Hospital of the Kirovohrad Regional Council", with restrictions on freedom of movement and the confiscation of a personal mobile phone.

The child was hospitalized without the participation of a psychiatrist. The informed consent forms for psychiatric examination and hospitalization were drawn up improperly and were actually selected by a nurse, not a doctor. The medical documentation contained formal references to the child's aggressive behaviour, but the description of the mental state did not contain clinical symptoms that could be grounds for inpatient psychiatric care. The child was taken to the institution accompanied by a psychologist and patrol police officers after a conflict with the staff of the special school where the child in question was located. In fact, the child's hospitalization was a reaction to conflict behaviour, not the response to the state of mental health.

The head of the monitoring group informed the National Police and the children's service, recorded the child's lack of consent to receive psychiatric care, assessed her safety level, and transferred her from the psychiatric hospital to a social and psychological rehabilitation facility on the same day.

In view of the above, the use of physical restraints on children in healthcare facilities, especially when these measures are carried out without constant supervision by qualified medical personnel and without records in medical documentation (particularly, without the time of application, reasons and consequences of restraint being indicated), may be regarded as a manifestation of child abuse under Article 3 of the Convention for the Protection of Human Rights and Fundamental Freedoms.

The monitoring group established facts of ill-treatment of children by the institution's staff, in particular the use of physical restraint (fixation) without proper legal and medical grounds. In particular, the child was found tied to a high chair with a fabric belt, and later placed and fixed in a car seat. The specified means were used by the staff not for the temporary stay of children during feeding or transportation, but

directly for the long-term stay of children.

At the same time, the analysis of the children's medical documentation did not confirm the presence of grounds for the use of physical restraint, in particular the children's actions that could pose an immediate danger to themselves or others. In addition, no records were found of a preliminary examination of the children by a doctor, including a psychiatrist, the provision of medical care to them, or the use of alternative, less restrictive measures. There are no protocols for the use of physical restraint (fixation), which indicates a gross violation of the established procedure and poses risks to the life, health, and dignity of children.

During the monitoring visit, a gross violation of the rights of a minor patient who was brought to the children's psychiatric ward at night in a state of drug intoxication was revealed. Instead of a proper assessment of the condition and provision of medical care to the child, physical restraint (fixation) was applied, which actually lasted for almost the entire period of her stay in the institution. The decision on continuous fixation, as well as the facts of the use of physical force against the child (hitting, pushing, pressing a pillow to the face) posed an actual threat to her life and health.

Only following the monitoring group's intervention were the bodies of the National Police of Ukraine notified and a pre-trial investigation initiated. Based on the results of the investigation, information was entered into the URPTI under Part 1 of Article 127 of the Criminal Code of Ukraine (torture).

The European Committee for the Prevention of Torture (hereinafter referred to as the Committee) has repeatedly highlighted the need to prevent the use of restraints on minors. In particular, in its recommendations to the Government of the Republic of Estonia (CPT/Inf (2024) 27), the Committee notes that, in principle, adolescent patients should not be subjected to means of coercive restraint. The Committee also indicates that in extreme cases where physical intervention is necessary to prevent harm to oneself or others, the preferred intervention is manual restraint (i.e. holding the patient by staff until the said patient calms down). The Committee's conclusions of a similar nature were provided to the Government of the Republic of North Macedonia (CPT/Inf (2024) 17) on the need to discontinue the use of restraints on agitated minors in psychiatric institutions.

The Commissioner made a submission to the MoH with a request to amend the Order of the MoH No. 240 of March 24, 2016, in order to prohibit the use of physical restraint (fixation) on children, including minors.

4.6. Right of the Child to Social Protection

Throughout 2025, the Ukrainian Parliament for Human Rights received **171 appeals** regarding the violation of the right of children and families to adequate social protection (the Commissioner initiated proceedings on **84 appeals**, of which **24 families** were restored to the right to social protection by the state).

During 2025, among the important issues with which citizens addressed the Commissioner, was the one of significant delays and lack of decisions on the payment of state assistance to families with children, which led to a further violation of the right of the child to adequate social protection by the state.

This was due to the Government's decision to change the administration of social payments and state assistance, which were previously processed by social protection bodies in local communities. Thus, in accordance with the Resolutions of the Government of Ukraine No. 695 of June 11, 2025 "Certain Issues of Providing Certain Types of State Social Assistance by the Pension Fund of Ukraine", No. 766 of June 23, 2025 "On the Implementation of a Pilot Project on Centralizing the Payment of Certain State Benefits", No. 765 of June 25, 2025 "Certain Issues of Assignment and Payment of State Social Assistance, Social Stipends by the Bodies of the Pension Fund of Ukraine", from July 1, 2025 the Pension Fund of Ukraine started administering state social assistance provided at state expense²⁰.

The Ministry of Social Policy, when transferring administration, publicly announced its intention to carry out operations to calculate payments within the time limits prescribed by law. At the same time, with the PFU receiving broad powers in the field of providing state assistance and social payments, the Commissioner began receiving appeals regarding the suspension of payments and other violations of citizens' rights in the mentioned area.

The communication work regarding the change in the administration of state assistance payments and the change in social payments by the PFU and the Ministry of Social Policy was not carried out properly, which led to citizens' misunderstanding of the application form, the list of required documents, deadlines, and places of submission.

In particular, violations of the right of parents, guardians/custodians of children, and other legal representatives to receive state social assistance became relevant from July 1, 2025, when the PFU did not extend the payment of state assistance, which until June 30, 2025, was carried out by structural units for social protection of the population of district executive bodies, executive bodies of districts of the cities of Kyiv and Sevastopol, executive bodies of city, city districts (if established) councils.

²⁰ <https://www.msp.gov.ua/press-center/news/vsi-vyplaty-sotsialnykh-dopomoh-budut-zdiysneni-vchasno-v-stroky-vyznacheni-zakonodavstvom>

The Secretariat of the Commissioner sent requests regarding each of the appeals the PFU and its territorial divisions for conducting relevant inspections and taking response measures aimed at ensuring the right of families with children to proper social protection.

In view of the above, the Secretariat of the Commissioner sent a request to the Ministry of Social Policy with a request to ensure the continuation of the payment of state benefits that are not paid to recipients, to provide informational, advisory assistance and to ensure social support for recipients of state benefits, particularly regarding the processing of documents.

However, the request was not considered objectively: only copies of short responses from regional state administrations were provided while no necessary analytical work has been conducted no response measures aimed at resolving the problem were taken.

The Ministry of Social Policy has been informed that regional state administrations, together with the PFU, have been instructed to take measures to control the payment of state social benefits aimed at respecting the rights of the child. The issue remains under the control of the Commissioner, and measures are being taken within the framework of proceedings opened upon citizens' appeals.

In 2025, a resident of Odesa region appealed to the Commissioner regarding the violation of her right to receive various types of social assistance.

A family-type children's home, in which 10 children are raised, was relocated from Luhansk region due to the armed aggression of the Russian Federation. Due to the violation of the deadlines for considering the applicant's application for the assignment of state-guaranteed social benefits, her family was deprived of the right to proper social protection.

In order to restore the right of a family with children to state social benefits, the Commissioner sent a request to the NSSU to clarify the circumstances of the situation.

As a result, due to the Commissioner's response, the citizen was assigned and paid housing assistance for internally displaced persons and state social assistance for orphans and children deprived of parental care, and financial support for foster parents and adoptive parents in full.

Thanks to the measures taken, the right of families with children who are IDPs to proper social protection from the state has been restored.

Citizen K. appealed to the Commissioner regarding the violation of his

daughter's right to social protection by the state. According to the applicant, back in May 2025, his wife submitted an application for the assignment of state social assistance to persons with disabilities since childhood and children with disabilities. However, the applicant's wife did not receive the specified assistance, since the territorial bodies of the Pension Fund of Ukraine had not processed the application and documents submitted for the assignment of assistance for more than six months, and no relevant decision had been made.

As part of the proceedings, a request was sent to the Pension Fund of Ukraine with a request to verify the facts provided in the application and, based on the results, take response measures specified by law.

The Main Directorate of the Pension Fund of Ukraine in Kyiv, in response to the request, was informed that the applicant's wife had been assigned state assistance for a period of two years.

The Main Directorate was also informed that state aid funds for a period of seven months were transferred to the personal account of the applicant's wife in a banking institution.

Another problem was the loss of validity of the Resolution of the Government of Ukraine No. 214 of March 7, 2022 "Certain Issues of Providing State Social Assistance And Benefits for the Period of Martial Law", which provided for the accrual and payment of assistance for children under guardianship or care. The aforementioned Resolution provides that in case the the recipient of assistance has not identified himself by November 1, 2025, the accrual of such state social assistance will be carried out without its payment.

However, explanatory work was not carried out by the territorial divisions of the PFU or the PFU itself or the social protection units of the Ministry of Social Policy.

Therefore, the legal representatives of the children were not aware of the need to visit the PFU bodies to undergo personal identification before November 1, 2025.

RECOMMENDATIONS:

To the Cabinet of Ministers of Ukraine:

to ensure amendments/develop and adopt, if necessary, new subordinate regulatory legal acts in order to bring them into line with the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine Regarding the Regulation of Evacuation, Accommodation and Life Support of Evacuated Population, Ensuring the Protection of Children in Settlements Located in the Territories of Current and Possible

Military (Combat) Operations" in order to regulate issues of mandatory evacuation in a forced manner without the consent of children's legal representatives;

to introduce during 2026 a state quality standard for personal protective equipment for children (body armour, helmets) used during evacuation measures;

to take measures to resolve the issue of providing personal protective equipment for children under 4 years of age during the organization of measures for their further evacuation;

to develop a mechanism for informing military units participating in combat operations on the frontline, the National Police of Ukraine and guardianship and care bodies of children found in zones of active combat operations for the purpose of their further immediate evacuation;

to approve the draft Law of Ukraine "On Amendments to the Criminal Code of Ukraine, the Criminal Procedure Code of Ukraine and Other Legislative Acts on Child-Friendly Justice", which was developed to implement Measure 2 of section "Ensuring the Protection of Children's Rights and the Principles of Child-Friendly Justice" of Area 3.5 of the Rule of Law Roadmap, approved by the Resolution of the Government of Ukraine No. 475-p of May 14, 2025;

to ensure control over the use by the relevant administrators of the subvention for the implementation of the public investment project for the arrangement of safe conditions (arrangement of shelters) in institutions providing general secondary education, in particular military (naval, military-sports) lyceums, lyceums with enhanced military-physical training, and in preschool education institutions, approved by the Resolution of the Government of Ukraine No. 419 of April 28, 2023 (as amended by the Resolution of the Government of Ukraine No. 1793 of December 26, 2025);

to develop and approve a state target program for the restoration and security of educational infrastructure, which would provide for a phased return to in-person education, taking into account the security situation, the level of mine danger and the technical condition of educational institutions;

to develop and implement standards for the implementation of the educational process, as well as technical requirements for the premises of the so-called "underground" educational institutions;

to ensure the development of a mechanism for allocating funds to executive bodies to implement measures to return children who are citizens of Ukraine, in accordance with the Procedure for the Return to Ukraine of Children Deprived of Parental Care Who Are Citizens of Ukraine, approved by the Resolution of the Government of Ukraine No. 569 of April 23, 2003;

ensure the development and introduction of amendments to the Model Program for the Prevention of Violence and Cruelty to Children and the Procedure for

Responding to Cases of Violence and Cruelty to Children with other regulatory legal acts regulating the activities of entities in the field of child rights protection in order to agree on uniform terms for responding to reports of violence, and to clearly delineate the responsibilities and liabilities of entities;

to ensure the development and approval of minimum standards for providing individual clothing, items, materials and equipment to children placed in institutions of the institutional care and upbringing system, as well as other institutions for 24-hour stay, of various subordination and forms of ownership;

to develop and ensure amendments to the CoAO of Ukraine regarding the term of imposition of administrative penalties for offenses provided for in Article 173-4 of the CoAO of Ukraine regarding bullying (harassment) of a participant of the educational process, in terms of increasing it to one year from the date of the commission, as well as determining administrative liability for committing violence and cruel treatment of children (which does not fall under the designations of bullying (harassment));

to ensure coordination of activities and interaction of the Ministry of Social Policy, Family and Unity of Ukraine, the SSUCR and the NSSU with regional military administrations regarding observance of the rights of children temporarily displaced (evacuated) outside Ukraine, in particular, responding to identified violations (if they are detected), conducting monitoring visits (urgent monitoring visits), assessing the needs of children and their return to the territory of Ukraine and placement in family forms of upbringing.

To the Ministry of Justice of Ukraine:

to develop a draft act on amendments to the Criminal Code of Ukraine in the part of Section I of the Special Part regarding the criminalization of acts of involvement (use) of minors and underage persons to commit criminal offenses against the foundations of national security of Ukraine.

To the Ministry of Foreign Affairs of Ukraine:

to take measures to expand membership in the International Coalition for the Return of Ukrainian Children aimed at ensuring the return of deported and forcibly displaced children to the territory of Ukraine.

To the Ministry of Social Policy, Family and Unity of Ukraine:

to ensure that the Pension Fund of Ukraine continues to timely accrue and pay all types of state social assistance to recipients who have not received state social assistance or have received it with a violation of the terms of payment;

to ensure proper information and advisory support to recipients of state assistance regarding the conditions and procedure for granting state assistance and the grounds specified by law for terminating such payments;

to ensure social support for recipients of state assistance in the process of receiving documents necessary for processing the applications for state assistance.

To the Ministry of Social Policy, Family and Unity of Ukraine:

To develop and approve, together with the Ministry of Education and Science of Ukraine and the MIA of Ukraine, an interdepartmental cooperation program to conduct a broad information and awareness-raising campaign on the protection of children from participation in hostilities and armed conflicts.

To the Ministry of Health of Ukraine:

to establish a ban on the use of physical restraint (fixation) for children, in particular minors, by amending the Rules for the Use of Physical Restraint and (or) Isolation in the Provision of Psychiatric Care to Persons Suffering from Mental Disorders and the Forms of Primary Registration Documentation, approved by Order of the MoH No. 240 of March 24, 2016;

to approve clear and substantiated criteria for the provision of inpatient psychiatric care to children in order to stop the groundless placement of children for inpatient treatment, who may receive outpatient psychiatric care.

To the Ministry of Education and Science of Ukraine:

to ensure compliance with uniform standards of a safe educational environment for educational institutions operating in front-line and de-occupied communities, taking into account the availability of certified shelters, evacuation routes, as well as warning and communication systems;

to amend the Procedure for Responding to Cases of Bullying (Harassment), approved by the Order of the Minister of Education and Science of Ukraine No. 1646 of December 28, 2019, regarding the determination of the authorized body in the regions to verify compliance with the requirements by the response entities in the event of a case of bullying (harassment) in educational institutions;

to introduce the collection and generalization of information on the number of cases of bullying in educational institutions and publish the relevant data quarterly on the official website of the Ministry of Education and Science of Ukraine;

to develop and approve amendments to the Procedure for Providing Clothing and Bedding Items for Orphans and Children Deprived of Parental Care Residing or Studying in Educational Institutions of all Types on Full State Support, approved by the Order of the Ministry of Education and Science of Ukraine No. 763 of November 17, 2003;

to continue to regularly update information from regional military administrations and local self-government bodies on the facts of attacks on educational institutions in conditions of armed conflict through monitoring in accordance with the goals of the Safe Schools Declaration;

to intensify the work of the Interdepartmental Working Group on the Implementation of the Safe Schools Declaration;

to ensure amendments to the Staffing Standards for General Secondary Education Institutions, approved by the Order of the Ministry of Education and Science of Ukraine No. 1205 of December 6, 2010, regarding the conditions for introducing the positions of a practical psychologist and a social pedagogue by reducing the specified minimum number of students;

to develop and ensure amendments to the CoAO of Ukraine, the Law of Ukraine "On Childhood Protection" and the Procedure for Responding to Cases of Bullying (Harassment) (Order of the Ministry of Education and Science No. 1646 of December 28, 2019) in order to unify the definition of the term "bullying (harassment)".

To the Ministry of Development of Communities and Territories of Ukraine / regional military administrations:

to develop and implement regional programs to support children and youth who have returned to the territory controlled by Ukraine after deportation, forcible displacement or from the temporarily occupied territories;

to develop an algorithm for interaction between entities involved in working with children to ensure accounting/exchange of information about evacuated (displaced) families with children to safe territories, monitoring of such families, prompt response and, if necessary, take measures to provide social support for such families with children;

to ensure coordination of demining work in areas linked to educational institutions as a prerequisite for the resumption of full-time education in the de-occupied territories.

To the National Social Service of Ukraine:

to develop and implement an algorithm for joint actions with regional military state administrations, local self-government bodies as guardianship and care bodies regarding the processing and reconciliation of information about children left without parental care, taken from legal representatives abroad, about relatives and their place of stay/residence; and to inform the Commissioner about the results of the work carried out monthly by the 5th of the month following the reporting one.

To the State Service of Ukraine for Children's Rights:

to ensure the process of returning Ukrainian children from the temporarily occupied territories and the territory of the Russian Federation, to conduct explanatory work for guardianship and care bodies on the practical application of Items 79 to 79-3 of the Procedure for the Conduct of Activities by Guardianship and Care Bodies Related to the Protection of the Rights of the Child, approved by the Resolution of the Government of Ukraine No. 866 of September 24, 2008, in terms of granting children the status of an orphan and a child deprived of parental care, placing such children on primary registration and establishing guardianship/care over them under a simplified procedure by persons who are in family or kinship relations with an orphan or a child deprived of parental care.

To the regional military administrations, local self-government bodies:

to provide for 2026 expenditures for the implementation of Item 10 of the Procedure for the Return to Ukraine of Children Deprived of Parental Care Who Are Citizens of Ukraine, approved by the Resolution of the Government of Ukraine No. 569 of April 23, 2003 urgently;

to ensure that children are granted the status of orphans and children deprived of parental care, to ensure that such children have undergone primary registration and that guardianship/care is established over them under a simplified procedure, in accordance with the requirements of Items 79 to 79-3 of the Procedure for the Conduct of Activities by Guardianship and Care Bodies Related to the Protection of the Rights of the Child, approved by the Resolution of the Government of Ukraine No. 866 of September 24, 2008, by persons who are in family or kinship relations with an orphan or a child deprived of parental care, with the aim of returning them from the temporarily occupied territories and the territory of the Russian Federation;

to ensure constant informing of the population remaining in the territories where mandatory forced evacuation is being carried out, regarding the need to promptly notify the hotline in case of establishing the fact of abandonment of a child / return of a family with a child;

to inform the parents of children, in particular by means of notifications on phones, messengers, about the consequences, in case of their return together with their children to the territory where mandatory forced evacuation is being carried out;

to conduct explanatory work among families with children regarding the right to deferment from military service during mobilization in accordance with Article 23 of the Law of Ukraine "On Mobilization Training and Mobilization", as well as the right to be released from military service in accordance with Article 26 of the Law of Ukraine "On Military Duty and Military Service" in order to ensure the right of children to be raised in a family environment;

to ensure control over the activities of subordinate educational institutions to prevent the dissemination of excessive amounts of personal data of participants in the educational process.

5. SOCIAL, ECONOMIC, CULTURAL RIGHTS AND THE RIGHT TO A SAFE ENVIRONMENT

Number of appeals	4 940
Number of proceedings	695
Number of renewed rights (individual and collective)	23 304
Number of developed draft regulatory legal acts	1 310
Number of monitoring (on-site and off-site)	109
Number of response acts of the Commissioner (submissions)	7

5.1. Right to Social Protection

The results of the parliamentary control carried out by the Commissioner confirmed violations of rights of individual and citizen in the field of social protection. Those most often concerned the exercise of the right to pension provision, receipt of state social benefits, benefits and housing subsidies, and social services.

Some of the violations were due to changes in the regulatory regulation of pension provision and social protection of certain categories of persons through the Law of Ukraine "On the State Budget of Ukraine for 2025" No. 4059-IX of November 19, 2024 (hereinafter referred to as the Law No. 4059-IX), which does not comply with constitutional principles, as the CCU has repeatedly noted in its decisions in similar cases. However, the relevant observations of the Commissioner were not taken into account when adopting Law No. 4059-IX.

Violation of the right of citizens to receive state social benefits occurred in the context of the transfer of functions regarding their payment from social protection bodies to the PFU bodies. The latter were unable to ensure the continuity of already assigned payments or the timeliness of assigning new ones.

5.1.1. Right to Pension for Certain Categories of Pensioners

The Commissioner received applications from citizens receiving pensions in accordance with special laws, calculated on the basis of court decisions adopted in their favour. The applicants reported a violation of their right to pension provision due to the restriction of the payment of pensions, the amount of which exceeds ten subsistence minimums established for persons who have lost the ability to work (from January 1, 2025 - UAH 23,610), by the amount calculated by applying the specified coefficients to the amount of excess. Such a restriction was applied on the basis of Article 46 of Law 4059-IX and the Resolution of the Government of Ukraine No. 1 of January 3, 2025 "On

Determining the Procedure for Paying Pensions to Certain Categories of Persons in 2025 During Martial Law".

The restriction introduced in 2025 is explained by the Government of Ukraine, as the subject of the legislative initiative, by the impossibility of financially providing for such pensions and the need for proportional redistribution of funds in order to maintain the balance of interests of the society as a whole. The result of applying such a restriction was a decrease in the PFU expenditures in 2025 by UAH 2.9 billion.

According to the PFU, the restriction was applied to 101,455 pensioners (12.7 percent of the number of pensioners (800,857 people) receiving a pension assigned under special laws), which is less than 1 percent of the total number of pensioners in Ukraine (10.3 million people).

5.1.2. Right to State Support, Benefits and Housing Subsidies

(a) Right to State Social Support in the Context of the Transfer of Functions from Social Protection Bodies to the Bodies of the Pension Fund of Ukraine

In accordance with the Resolution of the Government of Ukraine No. 695 of June 11, 2025 "Certain Issues of Providing Certain Types of State Social Assistance by the Pension Fund of Ukraine" (hereinafter referred to as Resolution No. 695), from July 1, 2025, the powers to assign and pay a number of state social assistance were transferred from the structural units for social protection of the population of district state administrations, state administrations of the districts in the cities of Kyiv and Sevastopol, executive bodies of city councils, district in the cities (in case of formation) (hereinafter referred to as the body that transferred the powers) to the main directorates of the PFU in the regions and the city of Kyiv (hereinafter referred to as the PFU bodies).

The Commissioner's monitoring established a violation of the right of citizens to timely receive relevant benefits, since as of June 30, 2025, decisions on almost 17 thousand applications for the assignment of assistance were not made by the body that transferred the powers.

The Commissioner's recommendations on determining the terms within which the PFU bodies must ensure the adoption of decisions on applications received from the bodies that transferred powers were taken into account in the said resolution. Based on the results of consideration of the applications, it was established that the PFU bodies violated the terms when making decisions on the assignment or extension of the payment of state benefits specified in Resolution No. 695.

In December 2025, citizen O. from Lviv region applied to the Commissioner regarding the failure to receive state social assistance from the Main Directorate of the PFU in Lviv region for persons who are not entitled to a pension and persons with disabilities, which he received from the social protection agency until June 30, 2025.

As a result of the Commissioner's response, the appropriate assistance funds (from July to December 2025) were transferred to the applicant's bank account in December 2025.

(b) Right to Receive Burial Assistance for Persons Who Were Fully Dependent on the State

During the consideration of citizens' applications regarding receiving a funeral allowance, different approaches were identified in determining its size. According to the provisions of Article 52 of the Law of Ukraine "On General Mandatory State Pension Insurance" No. 1058-IV of July 9, 2003 (hereinafter referred to as the Law No. 1058-IV), in the event of the death of a pensioner, the persons who carried out their burial shall be paid a funeral allowance in the amount of two months' pension received by the pensioner at the time of death.

In the event of the death of a pensioner who was on full state support in an institution (facility), the benefit to the persons who performed his burial is paid only at the rate of 25 percent of the assigned pension, since it was this amount of pension the pensioner received at the time of death, as foreseen by Article 48 of Law No. 1058-IV and the Procedure for the Transfer of Funds by the Bodies of the Pension Fund of Ukraine to Institutions (Facilities) in Which Persons Are On Full State Support and Their Use, approved by the Resolution of the Government of Ukraine No. 269 of March 4, 2004.

According to the position of the Commissioner, the amount of the funeral benefit should be calculated from the full amount of the pension assigned to the pensioner, and not from the pension received at the date of death, since this payment is aimed at compensating for expenses related to the burial, which arise regardless of the fact that the deceased was on full state support.

The Commissioner's recommendations to the Ministry of Social Policy on resolving the described situation were taken into account in the adopted Resolution No. 695, which ensures the receipt of funeral benefits based on the full amount of the assigned pension or state social assistance.

(c) The Right to Receive a "Winter Support" One-Time State Cash Benefit

President of Ukraine Volodymyr Zelenskyi initiated a program of social support for citizens during the difficult winter period, one of the types of which is a "Winter Support" one-time state cash benefit (hereinafter referred to as the Benefit) in the amount of UAH 1,000. The assistance was provided in accordance with the Resolution of the Government of Ukraine No. 952 of August 20, 2024 "On the Implementation of Experimental Projects within the Framework of the All-Ukrainian Economic Platform "Made in Ukraine" to all Ukrainians residing in Ukraine (except for the TOTs). It was possible to submit an application for Benefit receipt during December 2024 - February 2025.

According to the Ministry of Economy, the project coordinator, 9.3 million citizens received Assistance through authorized banks and JSC "Ukrposhta" in the amount of nearly UAH 14.1 billion.

The Commissioner received appeals from citizens regarding the unjustified loss of the right to receive the Benefit. However, due to the expiration of the deadline for submitting an application for its payment, citizens' rights could not be renewed. The Commissioner's monitoring established the main reasons that complicated or made it

impossible to exercise the right to receive the Benefit: the absence or irrelevance of personal data in state registers required for forming an application through the Diia Portal; technical failures in the operation of information systems that affected the process of processing submitted applications; non-compliance of applicants with the criteria for participation in the project regarding stay in the territory of Ukraine as of December 1, 2024.

In May 2025, citizen S. from Kyiv applied to the Commissioner regarding the violation of her right to receive the Benefit.

The basis for the refusal was information about the applicant's crossing of the border, which is contained in the integrated interdepartmental information and telecommunications system for the control of persons, vehicles and cargo crossing the state border of Ukraine. The applicant was repeatedly notified of the rejection of the application for Assistance through the mobile application of the Diia Portal.

At the request of the Commissioner, the State Border Service did not confirm the information about the applicant's crossing of the border. Despite the recommendations of the Commissioner, the Ministry of Digital Transformation and the Ministry of Economy did not clarify the reasons for this situation. At the same time, the application of December 2025 for the payment of Assistance for the next winter period was once again rejected.

Only upon the Commissioner's appeal to the Prime Minister of Ukraine, Yuliia Svyrydenko, did the applicant receive Assistance, but only for an application submitted in December 2025.

(d) Right to Receive Benefits

The Commissioner received applications from citizens belonging to certain categories entitled to social benefits regarding the violation of their right to receive benefits for payment of housing and communal services as a result of the implementation of the provisions of Item 7 of the Transitional Provisions of Law No. 4059-IX and the amendments made for their implementation by the Resolution of the Government of Ukraine No. 1553 of December 31, 2024 "On Amendments to the Resolution of the Government of Ukraine No. 389 of June 4, 2015" to the Procedure for Providing Benefits to Certain Categories of Citizens Taking into Account the Average Monthly Total Family Income, approved by the Resolution of the Government of Ukraine No. 389 of June 4, 2015. In accordance with these changes, the provision of benefits is carried out provided that the average monthly total family income per person for the previous six months does not exceed the amount of income that gives the right to a tax social benefit (UAH 4,240 as of 2025), in accordance with the procedure determined by the Government of Ukraine.

The Ministry of Social Policy explains the introduced restrictions by the fact that, since 2015, part of the benefits have been provided taking into account income, that is, on the basis of targeting, and the new changes are aimed at unifying approaches and optimizing budget expenditures. However, the relevant legislative initiative was not supported by the Commissioner, since the basic laws do not provide for such restrictions for certain categories of citizens.

The Commissioner receives frequent appeals from citizens from among the privileged categories of the population regarding the *violation of their right to free transportation*.

The problem is primarily due to the fact that, since 2016, the financing of compensation payments for preferential transportation to transport enterprises from the State Budget of Ukraine has been canceled. Taking into account the decentralization reform, it is the territorial community where a person belonging to a preferential category resides that must take measures to implement the rights of citizens to preferential travel. However, the current norms of Article 91 of the Budget Code of Ukraine No. 2456-VI of July 8, 2010 allow local governments to provide funds for the specified purposes in local budget expenditures and exercise control over their use, but are not mandatory.

The issue of implementing the relevant right outside the territorial community where the beneficiary resides is generally unregulated at the legislative level.

Additional problems arose due to the introduction of an automated system for accounting for travel payments.

The Commissioner received appeals from residents of Zakarpattia region regarding the impossibility of exercising the right to free travel on the territory of the Uzhhorod City Territorial Community due to the introduction of an automated fare accounting system in public urban transport, since preferential transport cards are issued free of charge by the Uzhhorod City Council only to residents of the territorial community. Similar situations occurred in Lviv, Zhytomyr, Chernivtsi and other territorial communities.

According to the position of the Ministry of Social Policy, it is possible to exercise the right to free travel on the territory of another territorial community by:

- an application by a beneficiary to the municipal authority at the place of registration regarding the conclusion of agreements between the municipal authority and the carrier providing transportation on the territory of another territorial community, to compensate for the cost of travel for preferential categories of citizens;*
- the purchase of an electronic ticket and use of it on general grounds with subsequent reimbursement of travel expenses by the local self-government authority at the place of registration.*

The recommendations made by the Commissioner to the relevant local self-government authorities regarding the implementation of appropriate actions were not implemented.

In view of the above, an important step is the adoption by the Parliament on June 18, 2025 in the first reading as a basis of the draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine Regarding Travel Payment Benefits and Certain Other Benefits" (Registration No. 5651-2 of June 25, 2021).

(e) Right to Housing Subsidies

During the consideration of citizens' appeals to the Commissioner, numerous cases of violations by territorial bodies of the PFU of citizens' rights to receive housing

subsidies on the basis of unreliable data about their stay abroad obtained during verification were identified.

The monitoring established that the territorial bodies of the PFU massively suspended the payment of housing subsidies to citizens based on the recommendations of the Ministry of Finance, taking into account the data received from the State Border Service during the verification procedure on the stay of applicants or members of their households abroad for more than 60 days. At the same time, the data received indicated the dates of citizens crossing the border without setting the dates of return to Ukraine. In the period from May 2024 to July 2025, the territorial bodies of the PFU made more than 18 thousand decisions on the termination of subsidies already assigned with reference to Item 90 of the Regulation on the Procedure for Assigning Housing Subsidies, approved by the Resolution of the Government of Ukraine No. 848 of October 21, 1995 (as amended by the resolution of the Government of Ukraine No. 807 of August 14, 2019) - failure to notify about staying abroad.

The consideration of applications to the Commissioner from citizens who had their housing subsidy suspended on the basis of their stay abroad for more than 60 days during the period of martial law in Ukraine showed that none of these facts were confirmed, and therefore their right to housing subsidy was restored.

In February 2025, citizen M. from Lviv region applied to the Commissioner regarding the unlawful termination of her housing subsidy payment by the Main Directorate of the PFU in Lviv region in connection with the receipt of data on her stay abroad. The applicant claimed that, during the legal regime of martial law, she did not travel outside Ukraine.

It was found that the payment of the housing subsidy to the applicant was suspended only on the basis of information about her crossing the border on February 29, 2020. The Main Directorate of the PFU in Lviv region applied to the State Border Guard Service to provide information about the applicant's possible return to Ukraine, but it was not provided, allegedly due to the need to protect the applicant's personal data.

In accordance with the recommendations of the Commissioner, the territorial body of the PFU conducted an on-site reception at the applicant's place of residence, as a result of which the payment of the housing subsidy was resumed from the month of termination, namely from October 2024. Unfortunately, the applicant did not live to see the receipt of the outstanding funds.

In order to prevent violations of citizens' rights to receive state benefits and housing subsidies, it is necessary to improve the mechanism for information exchange on citizens' stay abroad from the State Border Guard Service, ensuring their completeness and reliability.

5.1.3. Right to Social Services

The Commissioner received citizens' appeals regarding the violation of their right to receive social services.

The Commissioner, with the participation of representatives of the Rokada Charitable Foundation, also conducted monitoring visits to 6 territorial communities in Kyiv, Volyn and Ivano-Frankivsk regions in order to exercise parliamentary control over the observance of human and citizen rights to receive social services under the legal regime of martial law in Ukraine.

Based on the results of monitoring visits and consideration of citizens' appeals, a number of problematic issues were identified that led to the violation of citizens' rights to receive Social Services related to:

1) *legal regulation:*

- the provision of social services is regulated by the Resolution of the Government of Ukraine No. 1417 of December 29, 2009 "Certain Issues of the Activities of Territorial Social Service (Provision of Social Services) Centers" (hereinafter referred to as Resolution No. 1417), which contradicts the Law of Ukraine "On Social Services" No. 2671-VIII of January 17, 2019 (hereinafter referred to as the Law No. 2671-VIII);

The Commissioner received applications from citizen. K. from Chernivtsi region and citizen B from Zakarpattia region, who reported that they had been denied the provision of social services at home by the local self-government bodies due to the fact that both applicants have adult able-bodied children. The refusal was justified by the application of the relevant provisions of Resolution No. 1417, which contradict Law No. 2671-VIII.

On the recommendations of the Commissioner, the NSSU carried out state control measures over the decisions of the local government in the cases of the applicants. As a result, the local self-government bodies made a decision to provide the applicants with home care social services.

- individuals who provide social services on a professional basis did not receive compensation for care in accordance with the Resolution of the Government of Ukraine No. 1040 of October 6, 2021 "Certain Issues of Assigning and Paying Compensation to Individuals Providing Social Care Services Without Carrying Out Business Activities on a Professional Basis", since they could not provide a conclusion on the health status of a person who, due to a violation of the functions of the body, cannot move and serve themselves independently and requires the provision of Social Care Services, since its form was not approved by the MoH. The Commissioner provided recommendations to the MoH and the Ministry of Social Policy on the need to approve the form of the relevant conclusion, which are taken into account in the Order of the MoH No. 1811 of November 27, 2025 "On Amendments to the Order of the MoH No. 407 of March 9, 2021";

2) *practical implementation of the provisions of the legislation on social services:* the identification of the actual needs of the community in social services and their provision in accordance with these needs, a multidisciplinary approach to the provision of social services, and the implementation of state standards for social services are not ensured;

3) *financial and organizational support:* the volume of social services provision depends on the financial capacity of the territorial communities, there is a significant

difference in the level of social services provision in rural and urban territorial communities, social services are provided by unregistered providers.

The lack of financial resources of local budgets has affected the receipt of compensation for social services providers for care on both a non-professional and professional basis. Within the framework of consideration of individual appeals, the applicants' rights were restored - the local self-government bodies made a decision to assign appropriate compensation;

4) *personnel support*: shortage of qualified personnel due to low wages with a high workload;

5) *technical reasons*: imperfection of the software complex "Integrated Information System "Social Community"" in the section where personal cases for compensation for the provision of social services on a professional basis are processed.

Based on the monitoring results, recommendations were sent to the authorized bodies to eliminate the identified violations.

5.2. Right to Healthcare

According to the results of parliamentary control conducted by the Commissioner in the sphere of healthcare, violations of citizens' rights to proper and timely medical care for persons suffering from rare (orphan) diseases; assessment of the person's daily functioning; assessment of the quality of medical care and medical services; free provision of medical products and medicines; access to medicines were detected.

5.2.1. Right of Persons Suffering from Rare (Orphan) Diseases

Based on the results of consideration of applications from adults, parents of children suffering from rare (orphan) diseases, living in Volyn, Lviv, Chernihiv regions, the following was established:

1. The terms of the procedure for centralized procurement of medicines have not been determined, as a result of which in 2025 the regions were provided with medicines purchased from the state budget in accordance with 2024 applications. The need for medicines was not reviewed during the year.

The Commissioner received an appeal from citizen Z., a resident of Volyn region, suffering from pulmonary arterial hypertension, regarding the provision of medicines.

Within the framework of the open proceedings, information was received from the Department of Health of the Volyn Regional State Administration (hereinafter referred to as the Department) and the State Enterprise "Medical Procurement of Ukraine" (hereinafter referred to as the SE "Medical Procurement"), from which it was inferred that as of April 2025, the drug "Sildenafil", purchased by the SE "Medical Procurement" for funds in 2024, was undergoing laboratory analysis, after which it was to be distributed and shipped to the final recipients.

It was established that the drug "Sildenafil" was last supplied to Volyn region under the budget program "Provision of medical measures of individual state programs

and complex measures of a program nature" at the end of 2023. The patient has been registered since June 2024 and, accordingly, was not included in the formation of the need for patients for 2024, but was included in the need for 2025.

Based on the results of the measures taken, the Commissioner, the Department organized the redistribution of the available remains of this medicinal product in the health care facilities of Kharkiv and Zaporizhzhia regions and provided the applicant with a corresponding expensive drug in the amount of 210 tablets free of charge.

Patients with rare (orphan) diseases are not provided with sufficient quantities of medicines and medical devices, since their actual need is much higher than the envisaged state funding. For example, the Department of Health of the Lviv Regional State Administration reported that in 2024 only 35.5 percent of the declared need was received from state funding. As of February 2025, there were no supplies of the medicinal product "Cutaquig" for the treatment of Kawasaki disease. At the same time, in accordance with the Law of Ukraine "On Amendments to the Law of Ukraine "On the State Budget of Ukraine for 2025"" No. 4571-IX of August 20, 2025, expenditures under the program "Provision of medical measures of individual state programs and complex measures of a program nature" were increased by a total amount of UAH 2,334,339.4 thousand. As a result, compared to the beginning of the budget period, expenditures for the purchase of medical devices and medicines for citizens suffering from rare orphan diseases increased by UAH 969,478.3 thousand, including the purchase of medicines for citizens suffering from primary (congenital) immunodeficiencies and Kawasaki disease, by UAH 57,797.8 thousand.

The Commissioner monitored the implementation of the Action Plan for the implementation of the Concept for the development of the system of providing medical care to patients suffering from rare (orphan) diseases for 2021–2026, approved by the Resolution of the Government of Ukraine No. 1235-p of October 11, 2021. The purpose of the said Concept is to reduce mortality from rare (orphan) diseases, as well as improve the quality of life of patients suffering from rare (orphan) diseases.

One of the key measures of the said Plan is the approval of the national classifier of rare (orphan) diseases, the implementation of which was planned for the first quarter of 2022.

Due to the loss of validity of the Economic Code of Ukraine, the Ministry of Economy currently has no legal grounds for approving, amending and cancelling national classifiers.

The Ministry of Economy is currently developing a draft resolution of the Government of Ukraine on the approval of a pilot project that provides for granting individual central government bodies the authority to approve, amend, and cancel national classifiers in their areas of competence.

At the same time, the Order of the MoH No. 60 of January 15, 2026 approved the Handbook of Rare (Orphan) Diseases, which introduces a systematic approach to accounting for rare diseases and generating reliable information about treatment needs, which is an important step for planning and developing comprehensive care for rare diseases, improving access to diagnostics and treatment, building patient routes, and

expanding access to modern therapy. Its technical implementation is planned by the MoH in the electronic healthcare system.

5.2.2. Rights to Biological Paternity (Maternity) under the Legal Regime of Martial Law

Within the framework of parliamentary control, the Commissioner conducted monitoring on issues of preserving the reproductive health of citizens of Ukraine.

The monitoring established that in 2025, the NHSU concluded 44 contracts with health care institutions under the package of medical services "Treatment of Infertility Using Assisted Reproductive Technologies (In Vitro Fertilization)", which is 23 contracts more than in 2024. Payment for the services specified in this package was made within the framework of the Medical Guarantees Program.

The largest number of contracts was concluded with private health care institutions - 38. As of December 2025, the total number of patients who were provided with medical services in the treatment of infertility in 2025 under this package is 6,608, which is 3.5 times more than in 2024, which indicates the awareness of citizens and, as a result, the growth in demand for the use of assisted reproductive technologies (hereinafter referred to as the ART).

Number of contracts concluded and services provided regarding assisted reproductive technologies (in vitro fertilization) under the Medical Guarantees Program

Year	Total number of contracts	Of them with private healthcare institutions	Number of patients
2024	21	17	1 994
2025	44	38	6 608

The health care institutions that have concluded contracts with the National Health Insurance Fund for this package of medical services are located in Vinnytsia (1 institution), Volyn (2 institutions), Dnipropetrovsk (2 institutions), Zhytomyr (1 institution), Zakarpattia (1 institution), Zaporizhzhia (1 institution), Ivano-Frankivsk (3 institutions), Lviv (8 institutions), Kyiv (1 health care facility), Odessa (2 health care facilities), Rivne (2 institutions), Ternopil (1 institution), Kharkiv (3 institutions), Chernivtsi region (1 institution), as well as in the city of Kyiv (15 institutions) - i.e. in 14 regions and in the city of Kyiv.

In 10 regions, namely in Cherkasy, Chernihiv, Donetsk, Kherson, Khmelnytskyi, Kirovohrad, Luhansk, Mykolaiv, Poltava, Sumy regions, such health care institutions are absent. Among health centres of state and municipal ownership, only multi-profile cluster and supra-cluster hospitals of regional subordination or specialized health centres subordinate to the MoH meet the conditions for concluding contracts for the specified package of services.

Furthermore, within the framework of parliamentary control, the Commissioner found out that one of the spouses cannot exercise the right to biological paternity (maternity), since the other spouse went missing under special circumstances. This situation requires legislative regulation.

In an appeal to the Commissioner, citizen K. reported that she cannot use the embryo, stored in the reproductive technology medical centre since 2023 and was artificially inseminated on the basis of a joint application with her husband, a military serviceman. The legislation stipulates that the use of an artificially inseminated embryo for the use of ART is possible only in cases of obtaining the joint written consent of the spouses. Her husband cannot provide such consent, since he has gone missing.

Within the framework of the proceedings, the Commissioner provided recommendations to the MoH - to amend the Order No. 787 of September 9, 2013 "On Approval of the Procedure for the Use of Assisted Reproductive Technologies in Ukraine" (hereinafter referred to as the Order No. 787) and to provide for the right to biological paternity (maternity) not only in the event of the death of a person or the court declaring a person deceased, but also in the event of the court declaring a person missing.

The MoH reported that the relevant amendments to Order No. 787 will be made after the adoption of the law that will regulate the use of ART. Currently, the Government has developed a draft Law on the Use of Assisted Reproductive Technologies (reg. No. 13683 of August 22, 2025), to which the Commissioner's position on support has been provided, subject to taking into account the comments regarding the need to resolve the identified problematic issue.

5.2.3. Right to Access Medicines

In order to implement the decision of the National Security and Defence Council of Ukraine of February 12, 2025 "On Additional Measures to Ensure the Availability of Medicines for Ukrainians", which was put into effect by the Decree of the President of Ukraine No. 82/2025, the Government adopted the Resolution No. 168 of February 14, 2025 "On Amendments to Certain Resolutions of the Government of Ukraine on Stabilizing Prices for Medicines" (hereinafter referred to as the Resolution No. 168).

Resolution No. 168 governs the issue of setting mark-ups for medicines, prohibiting any marketing services for their promotion, and resuming inspections by the State Service of Ukraine for Food Safety and Consumer Protection in terms of price control in pharmacy chains.

The analysis of the norms of Resolution No. 168 shows that its main goal is to stabilize prices for medicines, which will contribute to their accessibility for citizens.

As part of monitoring and consideration of appeals, the following issues were clarified:

1) *medicines prices.* The MoH informed the Commissioner that as of December 8, 2025, according to the results of the analysis of the National Price Catalogue, medicines of domestic production are significantly cheaper than those of foreign manufacturers and have higher sales figures in packages than similar drugs of foreign production;

2) *the state of operation of pharmacies, mobile pharmacies in front-line territories, in remote areas and small settlements under the ban on the provision of marketing services.* The MoH was informed that as of November 3, 2025, an increase in the number of places of business activity in the retail trade of medicines (hereinafter referred to as PBAs) was recorded compared to January 1, 2021, which is approximately 5.53 percent (24,062 PBAs as of November 3, 2025 and 22,801 PBAs as of January 1, 2021).

The Commissioner received 82 letters from Members of the Parliament of Ukraine, public organizations and business entities operating in the wholesale and retail trade of medicines and medical devices. The letters noted that pharmacies operating in front-line areas, remote areas and small settlements, as well as mobile pharmacies, may cease operations due to the introduction of state regulation of marketing services, which will negatively affect citizens' access to medicines and medical devices.

Within the framework of the Commissioner's proceedings, expert consultations were held with the participation of Members of the Parliament of Ukraine, representatives of central executive bodies and pharmaceutical market entities, and proposals were developed on the normative and legal regulation of the issue of providing marketing and other services related to the sale of medicines to the end consumer.

The Commissioner sent relevant recommendations to the Prime Minister of Ukraine and the MoH.

The Commissioner's recommendations were taken into account in the Government's Resolution No. 1759 of December 26, 2025 "Certain Issues of Providing Marketing and Other Services Related to the Sale of Medicines to the End Consumer, and the Application of Instruments for the Actual Reduction of Purchase Prices after the Transfer of Ownership of Goods".

3) *peculiarities of the sale of medicines.* In 2025, the Government of Ukraine made numerous changes to the Licensing Conditions for Conducting Economic Activities in the Production of Medicines, Wholesale and Retail Trade in Medicines, and Import of Medicines (Except for Active Pharmaceutical Ingredients), approved by the Resolution of the Government of Ukraine No. 929 of November 30, 2016.

One of the changes is the restriction for pharmacies located in the premises of medical and preventive institutions to sell only the three cheapest medicines among similar drugs (same composition, dosage, form) determined by the National Price Catalog (Resolution of the Government of Ukraine No. 1802 of December 26, 2025 "On Amendments to the Licensing Conditions for Conducting Economic Activities in the Production of Medicines, Wholesale and Retail Trade in Medicines, and Import of Medicines (Except for Active Pharmaceutical Ingredients)").

The Commissioner did not support the mentioned changes at the stage of working out the draft resolution of the Government of Ukraine, since such restrictions during the period of the martial law legal regime significantly affect the rights of citizens to access medicines.

5.3. Impact of the Reform of Medical and Social Assessment on Citizens' Rights in the Field of Healthcare and Social Protection

From January 1, 2025, the reform of the medical and social expertise began, which provides for the elimination of the MSECs and the introduction of a human-centred model of assessment of daily functioning of a person (hereinafter referred to as the ADFP), which is carried out by expert teams of practicing doctors.

The regulatory and legal basis for the implementation of the reform was the adoption of the Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding the Reform of Medical and Social Expertise and the Implementation of the Assessment of Daily Functioning of a Person" No. 4170-IX of December 12, 2024 and the Resolution of the Government of Ukraine No. 1338 of November 15, 2024 "Certain Issues of the Implementation of the Assessment of Daily Functioning of a Person" (hereinafter referred to as Resolution No. 1338).

The reform of the MSEC in the first year of the implementation of the ADFP significantly affected the rights of persons with disabilities in the areas of healthcare and social protection. The reason for this situation is the lack of a transitional period for the implementation of new legislative norms, which would contribute to their lawful implementation. Due to the imperfection of the legislation or its improper application, persons with disabilities and children with disabilities since childhood were unable to confirm their status in a timely manner, and as a result, to receive state social benefits or disability pensions.

5.3.1. The right for an Assessment of Daily Functioning of a Person

During 2025, the Commissioner received 464 reports from citizens regarding violations of the right to disability assessment and 258 reports regarding violations of the right to be examined by expert teams for the assessment of daily functioning of a person (hereinafter referred to as expert teams).

Within the framework of the Commissioner's parliamentary control over the observance of citizens' rights to healthcare in the context of the reform of the medical and social expertise system, 17 monitoring exercises were carried out and an analytical study was prepared entitled "Implementation of the Assessment of Daily Functioning of a Person (ADFP): First Experience of Doctors and Patients".²¹

Based on the results of monitoring, research, and consideration of citizens' appeals, a number of problematic issues related to:

1) *legal regulations*: no deadlines have been set for the Centre for the Assessment of the Functional State of a Person of the state institution "Ukrainian State Research Institute of Medical and Social Problems of Disability of the Ministry of Health of Ukraine" (hereinafter referred to as the Assessment Centre) during the review of the decision of the expert team; requires improvement of the procedure for conducting the assessment of daily functioning for persons who are abroad on legitimate grounds;

2) *practical implementation of the provisions of the new Procedure for Conducting the Assessment of Daily Functioning of a Person, approved by Resolution No. 1338*:

²¹ <https://drive.google.com/file/d/1aLrtQ7yry67b8Ifv3vlfxm4DTzAJgMxm/view>

expert teams violate the proscribed deadlines (30 calendar days) for making a decision on establishing or reviewing disability; the Assessment Centre: considers medical expert cases of citizens who appeal the decisions of expert teams and the decisions of the MSECs within 5–6 months; in 2025, after an inspection initiated on the basis of a resolution of the investigating prosecutor, a resolution of the investigating judge or a decision, a ruling of the court, cancelled 2,019 decisions of the MSEC on establishing disability from the initial date when the person was assigned the appropriate disability group;

3) *staffing and their qualifications*: the number of specialist doctors insufficient to work as part of specialized expert teams in health care facilities in different regions of Ukraine; improper registration by doctors providing primary medical care or treating doctors - specialists of medical documents that are sent for consideration by expert teams.

In order to resolve the identified problematic issues, the Commissioner provided relevant recommendations to the MoH, the Assessment Centre and health care institutions.

5.3.2. Rights of Persons with Disabilities to Receive Pensions and State Social Assistance

During the consideration of citizens' appeals addressed to the Commissioner, systemic violations of citizens' rights by the territorial bodies of the PFU to receive state social assistance for persons with disabilities since childhood, children with disabilities, and disability pensions were revealed.

On the state social assistance for persons with disabilities.

The facts of unfounded suspension of payment of assistance on the grounds of failure to undergo the ADFP, untimely adoption of decisions on the assignment of assistance based on the results of the ADFP in cases transferred from social protection bodies, improper calculation of the amount of assistance after changing the disability group were confirmed. According to the recommendations provided by the Commissioner to the PFU, the NSSU, and the Ministry of Social Policy, the violated rights of citizens who applied to the Commissioner were restored.

On the receipt of disability pension.

Facts of violation by territorial bodies of the PFU of the norms of Paragraph 14-6.1 of the Final Provisions of Law No. 1058-IV and Resolution No. 1338 were revealed, which provided the opportunity to continue the payment of disability pension without undergoing the ADFP during martial law, a state of emergency in Ukraine and determined the procedure for revising its amount in the event of a change in the disability group, which led to:

1. unjustified termination of pension payments from July 1, 2025:
 - persons for whom, in accordance with Resolution No. 1338, later deadlines for undergoing the ADFP were established. Following the reaction of the Commissioner, the payment of disability pensions in such cases was resumed;
 - persons from vulnerable categories (those with oncological diseases, intellectual disabilities or mental disorders, persons with disabilities since childhood) who are unable to undergo the ADFP. The problem is related to the lack of regulation of the issue of documents confirming the person's belonging to the category of those who cannot be

required to undergo the ADFP. The PFU sees a solution to the issue of continuing pension payments to such persons in the event of amending Resolution No. 1338;

2. unlawful withholding from pensioners of pension funds paid in excess for the past period in the case of:

- assignment of a lower disability group based on the results of the ADFP, while when the disability group changes, the pension amount should be revised from the month following the month of receipt of the notification of the establishment of disability to the territorial body of the PFU. Upon individual appeals, such withholdings, as illegal, were canceled on the recommendations of the Commissioner;

- cancellation of disability groups previously established for citizens by expert teams from the ADFP. The problem is that the legislation does not contain clear norms that would determine the legal grounds for such actions by territorial bodies of the PFU, in particular, as provided for in the situation with a change in disability group. At the same time, it does not fall under the provisions of Article 50 of Law No. 1058-IV, which determines the conditions for withholding overpayments for previously assigned pensions. The existing legislative conflict should be resolved by amending the legislation. The Commissioner made relevant recommendations to the Ministry of Social Policy, but they were not supported by the latter.

5.4. Right to a Safe Environment

Violations of the human right to a safe environment are increasingly becoming a ground for appeals to the Commissioner due to problems in the field of waste management, violations of sanitary legislation and in order to protect the right to quality drinking water. The tangible concern of citizens about the risks of compliance with their environmental rights focuses the parliamentary control on conducting monitoring on the mentioned issues.

5.4.1. Practical Implementation of Waste Management Legislation under Martial Law

The problem of regulatory regulation of the waste management sector was the subject of monitoring by the Commissioner in 2024 and 2025: despite the fact that the Law of Ukraine "On Waste Management" No. 2320-IX of June 20, 2022 (hereinafter referred to as Law No. 2320-IX) entered into force on July 9, 2023, the Government of Ukraine did not ensure the adoption of all regulatory legal acts necessary for the implementation of that Law by the time it entered into force.

The results of the monitoring conducted by the Commissioner at the end of 2025 displayed the ongoing problems in the field of waste management.

At the national level, the following have not been adopted:

- draft laws on packaging and packaging waste; on batteries, accumulators, battery and accumulator waste; on end-of-life vehicles, waste tires and oils; on electrical and electronic equipment and waste electrical and electronic equipment;

- subordinate regulatory legal acts on the issues of identifying and accounting for waste whose owner is not identified; on the landfill control and monitoring programs and

requirements for it; on the unification of the form of the inspection report as foreseen by Law No. 2320-IX.

Certain regulatory legal acts have been adopted, but their entry into force has been postponed due to the introduction of the legal regime of martial law in Ukraine.

The European Commission emphasized the need to create a legal framework and infrastructure that will fully comply with the provisions of Directive 2008/98/EC of the European Parliament and of the Council of November 19, 2008 on waste and repealing certain Directives and other legislative acts in its Report on Ukraine's progress under the European Union Enlargement Package 2025.

Currently, the problem also remains the lack of funding and the lack of economic incentives to change approaches to waste management, which slows down the implementation of the waste management hierarchy.

An important economic tool for the implementation of the waste management hierarchy is appropriate taxation. The Ministry of Economy announced the development of a draft Law "On Amendments to the Tax Code of Ukraine Regarding the Environmental Tax Charged for Waste Disposal and Placement of Extractive Waste" to bring it into line with Law No. 2320-IX.

Within the framework of the Commissioner's monitoring, proposals were received from the regional military administrations on improving legislation for proper financing of the waste management sector. The Lviv Regional Military Administration proposed to make amendments to the BC of Ukraine regarding the ratio of distribution of revenues to state, regional and local environmental protection funds. The Cherkasy Regional Military Administration reported that certain environmental protection measures provided for in the Action Plan for the Implementation of the National Waste Management Plan for 2025-2033, the implementation of which is provided for by regional state administrations, do not correspond to the list of activities that belong to environmental protection measures, so they cannot be financed from environmental protection funds.

No body has been established to implement state policy in the field of waste management pursuant to the provisions of Law No. 2320-IX. As the Ministry of Economy notes, the powers to implement state policy in the field of waste management are partially exercised by a structural unit of the Ministry of Environmental Protection and Natural Resources of Ukraine (hereinafter referred to as the Ministry of Environment) (Ministry of Economy), which complicates the performance of the functions stipulated by the Law.

On the regional and local level

Currently, work is underway in the regions to develop regional waste management plans (hereinafter referred to as RWMPs) in accordance with the National Waste Management Plan until 2033 and the Action Plan for its implementation, approved by the Resolution of the Government of Ukraine No. 1353-p of December 27, 2024. As of February 16, 2026, the Ministry of Economy approved 13 RWMP projects (Kherson, Rivne, Zakarpattia, Zhytomyr, Dnipropetrovsk, Zaporizhzhia, Lviv, Kirovohrad, Poltava, Chernihiv, Ivano-Frankivsk, Cherkasy regions and the city of Kyiv), although the deadline for implementation according to the Action Plan is set at December 27, 2025.

The Kyiv region RWMP has been returned for revision, the Odessa region RWMP is under consideration.

The Ministry of Economy was informed that the draft RWMPs submitted for approval during 2025 do not contain information on the terms of termination of operation of landfills that do not meet the requirements of Law No. 2320-IX. This is due to the fact that the relevant regulatory legal acts (Order of the Ministry of Environment No. 26 of February 10, 2025 "On Approval of the Rules for Technical Operation of Landfills, Termination of Operation, Reclamation and Care of Landfills after Termination of Their Operation", Order of the Ministry of Environment No. 455 of April 29, 2024 "On Approval of the Requirements for the Plan for Bringing the Waste Disposal Site into Compliance with the Requirements of the Legislation") will enter into force no earlier than the date of termination or cancellation of the legal regime of martial law in Ukraine.

Also, within the framework of the monitoring of the Commissioner, the regional military administrations reported on the need to improve Law No. 2320-IX in terms of a clearer delimitation of the powers of state authorities and local self-government bodies. In particular, this concerned the collection, transportation and/or processing of waste whose owner has not been identified.

In 2025, the Commissioner received an appeal from citizen B., a resident of the Velyki Mezhyrichi Territorial Community of Rivne region, regarding the violation of environmental rights as a result of the creation of numerous unauthorized landfills and the inaction of the Velyki Mezhyrichi Village Council (hereinafter referred to as the Council) in the issue of establishing an administrative authority for the household waste management service, as provided for by Law No. 2320-IX - within a period of no more than six months from the date of its entry into force.

Thanks to the response of the Commissioner, inspections were carried out by the State Environmental Inspectorate of the Polissia Circuit, and landfills were identified within and outside the settlement.

To resolve the specified issue, the Commissioner appealed to the Council, the Rivne District State Administration, and the Rivne Regional Military Administration. The authorities emphasized that currently there is no mechanism that governs the procedure for resolving issues related to the collection, transportation and/or processing of waste whose owner has not been identified.

The Council, upon the Commissioner's appeal, was notified of the liquidation of 5 landfills. Other landfills were not liquidated, since, in accordance with Article 26 of Law No. 2320-IX, the powers of the executive bodies of councils in the field of waste management include ensuring the liquidation of unauthorized landfills only within the boundaries of settlements.

The Rivne Regional Military Administration instructed district state administrations and bodies of local self-government to prepare requests for the allocation of funds from the regional environmental protection fund in 2026 for the purpose of liquidating unauthorized landfills. However, the Council notified that there is no enterprise on the territory of the community that could be designated by the customer to implement these requests.

Currently, the violated right has been partially restored, and the work on the appeals is ongoing.

5.4.2. Right to Access Information on the Results of Post-Project Monitoring

In the third quarter of 2025, the Commissioner conducted on-site monitoring of the implementation by business entities of the provisions of Article 13 of the Law of Ukraine "On Environmental Impact Assessment" No. 2059-VIII of May 23, 2017 (hereinafter referred to as Law No. 2059-VIII) in terms of conducting post-project monitoring (hereinafter referred to as the PPM).

The PPM is carried out in order to identify any discrepancies and deviations in the predicted levels of impact and effectiveness of measures to prevent and reduce environmental pollution. Based on the results of the PPM, if necessary, a business entity and the Ministry of Economy or a regional military administration, the Kyiv City Military Administration agree on the adoption of additional measures and actions to prevent, avoid, reduce (mitigate), eliminate, limit the impact of economic activity on the environment.

The Commissioner's monitoring has established that, following the introduction of martial law in the territory of Ukraine, a significant number of business entities partially suspended the implementation of the PPM due to the difficult security situation or officially informed about their intention to exercise the right to submit reports on the results of the PPM after the termination or cancellation of martial law in accordance with the Law of Ukraine "On Protection of the Interests of Subjects of Reporting and Submitting Other Documents during the Period of Martial Law or a State of War" No. 2115-IX of March 3, 2022. At the same time, it should be noted that this Law does not exempt business entities from implementing the PPM, but only provides for the right not to submit relevant reporting.

The most common typical violations in the implementation of the PPM by business entities are:

- failure to provide information on the results of the PPM, despite the reminder letters sent by the regional military administrations and the Kyiv City Military Administration;
- provision of PPM information partially, in violation of the established deadlines;
- failure to meet all requirements for the volumes, parameters, and periodicity of PPM studies provided for in the conclusions on environmental impact assessment.

As part of the Commissioner's monitoring, it was revealed that certain issues of PPM implementation require improvement:

- establishment of control over the PPM implementation by business entities, determination of the algorithm of actions of the authorized body that issued the conclusion on environmental impact assessment, in case of failure to submit (or submit in time, submit fully, etc.) information by business entities;
- establishment of mandatory unified standards and methods for conducting PPM;
- determining the possibility of submitting PPM information by a business entity directly to the Unified Register of Environmental Impact Assessment to ensure the public's right to access information on the state of the environment.

Based on the monitoring results, the Commissioner provided recommendations to the Ministry of Environment (currently the Ministry of Economy), which are being processed.

5.4.3. Right to Access Drinking Water

(a) Access to Sources of Drinking Water Supply

According to the Ministry of Development, provided in the National Report on the Quality of Drinking Water and the State of Drinking Water Supply and Sewerage in Ukraine for 2024, the coverage of cities with centralized water supply in 2024 was: for cities - 96.6 percent, for settlements - 87.6 percent, for villages – 24 percent. There is no centralized water supply in 12 cities: 6 cities in Donetsk region, 2 cities in Lviv region, 1 city in each of Zaporizhzhia, Ternopil, Kharkiv and Chernivtsi regions. There is also no centralized water supply in 71 settlements (in 15 regions) and 18,589 villages.

In settlements that do not have centralized water supply, drinking water is provided mainly from wells.

In March 2025, residents of the village of Vilshynky, Uzhhorod district, Zakarpattia region (15 families: 57 people, including 12 children) appealed to the Commissioner with a request to assist in restoring the right to access to a single source of drinking water supply and a road for public use.

For many years, citizens have been using a source of drinking water supply (damming), which is located in the "Pid Dil " tract on a land plot that was privatized. Repeated appeals to the owners of the land plots to ensure access to the capture and the road were ignored.

In response to the Commissioner, the Turie-Remetiv village council agreed with the owner of one of the land plots to withdraw its part in the amount of 0.45 hectares for citizens' access to the source of drinking water supply (damming) and the road, and consent was obtained from the owner of another land plot to change its configuration. As of January 21, 2025, land management work has been completed in full, technical documentation on land management regarding the establishment of land plot boundaries has been prepared, but has not been approved by the Council yet.

(b) Access to Quality Drinking Water

On April 25, 2025, the Commissioner presented a Special Report on the compliance with citizens' rights to clean and accessible water under the legal regime of martial law, which, in particular, highlighted the issue of nitrate pollution of water and analyzed the status of implementation of the Operational Plan for the Implementation of the Water Strategy of Ukraine for the Period Until 2050 in 2022-2024, approved by the Resolution of the Government of Ukraine No. 1134-p of December 9, 2022, which provided for the identification of zones vulnerable to (accumulation of) nitrates.

The problem of pollution of drinking water with nitrates is widespread. However, citizens are usually unaware of the consequences of drinking water with an increased content of nitrates.

According to the research conducted by the Centre for the Control and Prevention of Diseases in 2024,²² 3.1 percent of drinking water samples from rural water supplies did not meet the nitrate content standards. At the same time, the proportion of tested drinking water samples from non-centralized water supply sources that did not meet the nitrate content standards was 24.2 percent, and 29.8 percent from mining wells.

Epidemiological studies have shown a direct relationship between nitrate concentrations in drinking water and the incidence of atrophic gastritis and gastric cancer. Besides, drinking such water can lead to water-nitrate methemoglobinemia (oxygen starvation of tissues), which is especially dangerous for children under 3 years of age and pregnant women.

A resident of the village of Luka-Meleshkivska, Vinnytsia region, appealed to the Commissioner regarding the inadequate quality of drinking water in public wells. At the Commissioner's request, representatives of the Main Directorate of the State Service of Ukraine on Food Safety and Consumer Protection in Vinnytsia region, the Luka-Meleshkivska Village Council (hereinafter referred to as the Council) and the Municipal Enterprise "Lukakomunservis" conducted an on-site commission review of the appeal. According to the research protocols of the State Service "Vinnytsia Regional Centre for the Control and Prevention of Diseases of the Ministry of Health of Ukraine", water from public wells did not meet the requirements for physicochemical and microbiological indicators (nitrates, total hardness, total coliforms detected). In addition, it was established that the regulatory level of the specified indicators was exceeded in three samples of drinking water from two artesian wells and the village water supply system.

In response to the Commissioner, the Council organized the disinfection of two public wells and all nine wells maintained by the Municipal Enterprise "Lukakomunservis".

The drinking water test protocols provided by the Council after the disinfection confirmed that the indicators were within acceptable levels.

The right to access high-quality drinking water for residents of one of the streets of the village of Luka-Meleshkivska was restored.

5.5. Respect for the Rights of Persons Affected by the Chornobyl Nuclear Power Plant Accident

During 2025, the Commissioner received numerous appeals from persons affected by the Chornobyl disaster regarding the dosimetrist certification of settlements that were exposed to radioactive contamination, the provision of social guarantees for living in contaminated areas, adequate medical care, etc.

²² chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://mindev.gov.ua/storage/app/sites/1/uploaded-files/nacionalna-dopovid-pro-iakest-pitnoyi-vodi-ta-stan-za-2024-rik.pdf

On December 11, 2025, the UN General Assembly adopted a resolution "Strengthening of international cooperation and coordination of efforts to study, mitigate and minimize the consequences of the Chornobyl disaster".

Despite the fact that almost 40 years have passed since the Chornobyl disaster, the protection of the rights of victims does not lose its relevance.

5.5.1. Conducting dosimetry certification of settlements that were exposed to radioactive contamination as a result of the accident at the Chornobyl NPP

In 2025, 192 out of 927 settlements classified as zones of radioactive contamination as a result of the Chornobyl disaster were subject to dosimetry certification.

Representatives of local self-government bodies addressed the Commissioner with a proposal to conduct dosimetry certification in all 927 settlements.

The Commissioner supported the submitted proposal and submitted it for consideration by the Temporary Special Commission of the Parliament of Ukraine for the study of issues on strengthening social protection of citizens affected by the Chornobyl disaster and on the use of the territory that was subjected to radioactive contamination as a result of the Chornobyl disaster (hereinafter referred to as the TSC).

According to the State Agency of Ukraine for Exclusion Zone Management, in 2025, upon requests from local self-government bodies, 4 more settlements were additionally surveyed and dosimetry certification was actually conducted for 196 settlements in the regions of Kyiv, Zhytomyr, Rivne, Chernihiv and Sumy. As of January 2026, expert conclusions based on the results of dosimetry certification are at the stage of signature by the expert group of the National Academy of Sciences of Ukraine.

In 2026, dosimetry certification will be carried out in 731 more settlements, for which expenditures are provided in the State Budget for 2026 in the amount of UAH 157.8 million.

5.5.2. Right to Social Protection

- Preservation of Social Guarantees

The Commissioner received applications from citizens who have for a long time resided in the territories subjected to radiation contamination as a result of the Chornobyl disaster, regarding the preservation of benefits and compensations in the event of the exclusion of the territories where they live from the list of settlements that have been subjected to the corresponding radioactive contamination after conducting dosimetrist certification.

The Commissioner recommended that the Ministry of Social Policy work on the issue of preserving the relevant benefits and compensations.

According to the position of the Ministry of Social Policy, benefits and guarantees will be preserved for affected citizens belonging to categories 1 and 2 in the event of a change in the boundaries of radioactive contamination zones, but this does not apply to additional payments to non-working pensioners for residing in a radioactively contaminated territory, which is associated exclusively with the fact of living in a contaminated territory.

- **Receiving a Benefit for Residency in a Radioactive Contamination Zone**

The Commissioner received appeals from community representatives (Volyn, Rivne, Zhytomyr regions) as well as from individual citizens regarding the violation of the right of unemployed pensioners to receive additional benefits for residing in the radioactive contamination zone. They lost such a right from January 1, 2025 pursuant to the provisions of Article 45 of Law No. 4059-IX and the Resolution of the Government of Ukraine No. 1524 of December 27, 2024 adopted for their implementation "Certain Issues of Implementing Additional Payments to Unemployed Pensioners Who Permanently Reside in the Zone of Unconditional (Mandatory) Resettlement and in the Zone of Guaranteed Voluntary Resettlement in 2025".

The conditions for acquiring the right to the specified supplement, as well as its size, determined by these regulatory legal acts, are not provided for by the Law of Ukraine "On the Status and Social Protection of Citizens Affected by the Chornobyl Disaster" No. 796-XII of February 28, 1991 (hereinafter referred to as Law No. 796-XII).

Many citizens unjustifiably lost the right to an additional benefit to their pension due to the inability to confirm their residence in the radioactive contamination zone at the time of the Chornobyl accident or in the period before January 1, 1993 due to the absence of such information in the community registers.

During the consideration of individual applications from citizens, their right to receive the mentioned benefit was restored.

A resident of the city of Korosten, Zhytomyr region, citizen O., appealed to the Commissioner regarding the termination by the territorial body of the PFU of his pension supplement as of January 1, 2025 as an unemployed pensioner residing in the radioactive contamination zone.

The reason for the termination is the lack of information in the Unified State Demographic Register that would confirm the applicant's place of residence in the guaranteed voluntary resettlement zone.

In accordance with the Commissioner's recommendations, the Korosten City Council entered the relevant information into the register of territorial communities with its subsequent transfer to the departmental information system of the State Migration Service of Ukraine and the Unified State Demographic Register, after which the territorial body of the PFU resumed the payment of the pension supplement to the applicant from January 1, 2025.

To regulate the mechanisms for confirming residence in the territory of radioactive contamination, in March 2025, the Government of Ukraine adopted Resolutions No. 263 of March 7, 2025 "Certain Issues of Determining the Procedure for Entering Information about the Place of Residence of a Person in the Unconditional (Mandatory) Resettlement Zone or in the Guaranteed Voluntary Resettlement Zone for Receiving Relevant Additional Benefits" and No. 1277 of October 8, 2025 "On the Implementation of a Pilot Project on Entering Information about the Periods and Place of Residence of a Person with the Status of a Victim of the Chornobyl Disaster in the Unconditional (Mandatory)

Resettlement Zone or in the Guaranteed Voluntary Resettlement Zone as of April 26, 1986 or in the Period from April 26, 1986 to January 1, 1993".

The Commissioner's recommendations have been sent to the Ministry of Social Policy regarding the legislative regulation of the situation so that a person who temporarily changed his place of residence after 1993 for objective reasons (need for education, treatment, military service, etc.) does not lose the right to the specified additional benefit to the pension.

Such recommendations of the Commissioner to the Ministry of Social Policy have not been supported, as it has been argued that the additional benefit should be provided exclusively on the condition that such persons lived in the relevant zone as of April 26, 1986 or in the period from April 26, 1986 to January 1, 1993 and continue to live within the settlements that have the status of the relevant zone.

According to the PFU, as of December 1, 2024, 143,439 persons received the additional benefit to the pension, and following the application of the provisions of Law No. 4059-IX as of March 1, 2025 - 89,131 persons. Due to additional amendments to the legislation adopted in 2025, the number of recipients of the supplement has increased: as of July 1, 2025 - 104,495 persons, and as of December 1, 2025 - 111,003 persons. Thus, in total, 32,436 persons lost the right to receive the supplement compared to the end of 2024.

The Commissioner made recommendations to the Ministry of Social Policy on the legislative regulation of all existing problematic issues that lead to the violation of the rights of citizens affected by the Chornobyl disaster, in Law No. 796-XII.

The Ministry of Social Policy was informed about the development of relevant amendments to the legislation, in particular as part of the systematic update of pension provision for persons affected by the Chornobyl disaster, together with the reform of the general pension system.

The TSC is also developing relevant amendments to the legislation.

5.5.3. Right to Healthcare

(a) Access to Healthcare

In accordance with Article 17 of Law No. 796-XII, the Resolution No. 1218 of October 4, 1996 of the Government of Ukraine (as amended on October 25, 2002) (hereinafter referred to as Resolution No. 1218) approved the List of Specialized Medical Institutions Providing Treatment for Persons Affected by the Chornobyl Disaster.

According to Paragraph 2 of the aforementioned Resolution, specialized medical institutions included in the aforementioned List shall be responsible for providing the entire network of specialized medical institutions (including children's) with medicines (drugs, diagnostics, vaccines, serums) and medical equipment (devices, technical means, instruments, components and consumables) where persons affected by the Chornobyl disaster are treated.

The Commissioner was frequently addressed by representatives of public organizations of Chornobyl veterans, who stated that due to the reorganization of the health care system, persons affected by the consequences of the Chornobyl NPP accident, including persons with disabilities, are unable to receive specialized medical care.

The Commissioner received an appeal from the Chairman of the Board of the Public Union "Poltava Regional Association of Public Organizations of Disabled Chornobyl Veterans", in which it was reported that, since 2024, during the reorganization of the Municipal Enterprise "Lubny Regional Hospital for War Veterans of the Poltava Regional Council" into the KP "Kremenchuk Regional Clinical Hospital for War Veterans" (hereinafter referred to as the Kremenchuk Hospital), the specialized Chornobyl Department has been liquidated. To receive medical care in the Kremenchuk Hospital, citizens who suffered from the Chornobyl disaster have to wait in line for two to three months.

During the consideration of the appeal, it was found that the reorganization took place in accordance with the Decision of the Poltava Regional Council No. 830 of April 26, 2024. The renaming of the departments after the reorganization did not lead to a reduction in the volume or cessation of the provision of medical care to privileged categories, including persons affected by the Chornobyl disaster. Such persons are admitted for treatment by electronic referral if there are free places in a planned manner and in compliance with the principle of emergency. However, for the period from November 1, 2024 to July 31, 2025, 2,384 patients were treated in the Lubny branch of the Kremenchuk Hospital, of which only 113 persons (4.7 percent) are participants of the liquidation of the accident at the Chornobyl NPP.

At the TSC field meeting held on July 18, 2025, the Commissioner drew attention to the need to:

- 1) monitor the organization and conduct of annual medical examinations and treatment of all persons affected by the Chornobyl disaster;
- 2) organize an inspection of the state of provision of medical services in specialized healthcare institutions specified in the List, in accordance with Article 17 of Law No. 796-XII and update the List.

Following the meeting, the TSC recommended that the MoH review and, if necessary, suspend the decision to close and reorganize specialized healthcare institutions and their departments intended for the treatment of persons affected by the Chornobyl disaster by September 15, 2025, in order to ensure their proper functioning and accessibility in accordance with the requirements of Law No. 796-XII and Resolution No. 1218. As a result, the Resolution of the Government of Ukraine No. 1650 of December 12, 2025 "On Amendments to the Resolution of the Government of Ukraine No. 1218 of October 4, 1996" approved an updated list of specialized medical institutions providing treatment for persons affected by the Chornobyl disaster in the regions of Ukraine.

(b) Free Dental Prosthetics

In accordance with Paragraph 2 of Article 20 of Law No. 796-XII, persons affected by the Chornobyl disaster belonging to Category 1 have the right to free extraordinary dental prosthetics (with the exception of dental prosthetics made of precious metals and

metals equivalent in value to be determined by the central executive body that ensures the formation of state policy in the field of health care).

In the framework of considering citizens' appeals, it was found that there are no regulatory legal acts of the MoH regulating the implementation of the right of citizens affected by the Chornobyl disaster to free priority dental prosthetics.

The Commissioner received an appeal from citizen H., a resident of Rivne region, who reported that, as a person with a disability of Category III and as a liquidator of the Chornobyl NPP accident, he had until 2019 been receiving dental services, including dental prosthetics, at the Rivne Regional Hospital for War Veterans (after the renaming - the Municipal Enterprise "Rivne Regional Hospital for War Veterans" of the Rivne Regional Council).

However, according to the applicant, such services are currently not provided free of charge in the hospital "due to unprofitability". In response to the appeal to the MoH, citizen H. received information about the absence of a state program for dental prosthetics for citizens affected by the Chornobyl disaster, with recommendations to contact local government bodies.

Still, citizen H. was unable to receive free dental prosthetics at the district dental clinic due to the lack of funding from the district budget for this purpose, while the city clinic provides free dental prosthetics only to city residents.

The Commissioner provided proposals to the TSC on the normative regulation of the right to free dental prosthetics for persons affected by the Chornobyl disaster, by analogy with how it is regulated for persons who defend/defended the independence, sovereignty and territorial integrity of Ukraine.

At the initiative of the Commissioner, the TSC recommended that the Government of Ukraine amend the Resolution of the Government of Ukraine No. 156 of February 11, 2025 "Certain Issues of Using Funds Provided in the State Budget for the Provision of Certain Medical Services to Certain Categories of Persons Who Defend/Defended the Independence, Sovereignty and Territorial Integrity of Ukraine" (hereinafter referred to as Resolution No. 156), providing for the inclusion of citizens who suffered as a result of the Chornobyl disaster in the list of categories of persons subject to that Resolution, or to develop a separate regulatory legal act that would ensure the implementation of free priority dental prosthetics. As a result, on February 18, 2026, the Government of Ukraine amended Resolution No. 156.

(c) Free Provision of Medicines

According to Paragraph 1 of Article 20 of Law No. 796-XII, victims of the Chornobyl disaster of Category 1 have the right to free purchase of medicines according to doctors' prescriptions.

The issue of free treatment of persons affected by the Chornobyl disaster is governed by the Resolution of the Government of Ukraine No. 1303 of August 17, 1998 "On the Organization of Free Preferential Provision of Medicines According to Doctors' Prescriptions in the Case of Outpatient Treatment of Certain Groups of the Population and for Certain Categories of Diseases" (hereinafter referred to as Resolution No. 1303).

Financing of preferential provision of persons with medicines in accordance with Resolution No. 1303 is carried out from local budgets.

According to the results of parliamentary control, it was established that state financing of provision of medicines to persons affected by the Chornobyl disaster is carried out within the framework of the medical guarantees program on a general basis.

The Commissioner received an appeal from citizen S., a resident of Kyiv, a person with a disability of Category II, a participant of the liquidation of the Chornobyl accident of Category 1, regarding the violation of his right to be provided with a medicine free of charge.

Pursuant to Resolution No. 1303, the applicant has the right to be provided with medicines free of charge according to doctors' prescriptions in the case of outpatient treatment. At the same time, the effect of this resolution does not apply to medicines, the cost of which is reimbursed under reimbursement agreements concluded in accordance with the legislation. Therefore, citizen S. received a preferential prescription for insulin with a co-payment.

Within the framework of the Commissioner's proceedings, it was clarified from the MoH that patients with type 1 diabetes mellitus are provided with medicines under the Medicines Reimbursement Program ("Affordable Medicines") under the Medical Guarantees Program, which provides for both full and partial reimbursement of the cost of medicines.

Accordingly, persons affected by the Chornobyl disaster and suffer from diabetes, but who, according to their health status do not belong to the categories of persons who are fully reimbursed for the cost of insulin in accordance with the Resolution of the Government of Ukraine No. 854 of July 28, 2021 "Certain Issues of Reimbursement of Medicines and Medical Devices under the Program of State Guarantees of Medical Care for the Population", receive insulins according to doctors' prescriptions with a surcharge, which violates their right to free provision of medicines, guaranteed by Article 20 of Law No. 796-XII.

The problematic issue identified by the Commissioner requires normative and legal regulation.

5.6. Cultural Rights

The Russian Federation continues its systematic policy of destroying cultural heritage and cultural infrastructure on the territory of Ukraine, violating the rights of Ukrainians to access cultural services, cultural values, and cultural goods.

Such actions are a violation of international humanitarian law and are aimed at destroying the historical memory and national identity of the Ukrainian people.

5.6.1. Right to Access to Cultural Heritage

According to the Ministry of Culture, 1,640 cultural heritage sites and 2,446 cultural infrastructure sites have been damaged since the beginning of the full-scale invasion.

Among the damaged cultural heritage sites, 153 have the status of national significance, 1,333 – of local significance, and 154 – the status of the recently discovered ones. Damage was recorded in 18 regions. The most significant scale of destruction of monuments was recorded in the regions of Kharkiv - 344, Kherson - 297, Odesa - 182, Donetsk - 175, as well as in Kyiv region and the city of Kyiv - 163.

As a result of shelling and hostilities, 2,446 cultural infrastructure sites were damaged, of which 498 were completely destroyed. The greatest losses to cultural infrastructure were suffered in Donetsk, Kharkiv, Kherson, Kyiv, Sumy and Mykolaiv regions.

In 2025, as a result of Russian aggression in Ukraine, 307 cultural heritage monuments and 261 cultural infrastructure objects were destroyed and damaged, in particular 2 objects included in the UNESCO List of World Heritage in Danger (since 2023).

On June 10, 2025, as a result of a massive Russian attack, the plastered cornice of the central apse of the eastern facade of the St. Sophia Cathedral in the city of Kyiv - an 11th-century architectural monument included in the UNESCO World Heritage Site "Kyiv: Saint-Sophia Cathedral and Related Monastic Buildings, Kyiv-Pechersk Lavra" was damaged.

On July 24, 2025, as a result of another massive attack on the Ukrainian city of Odesa, 7 cultural heritage sites were damaged, some of which are located within the UNESCO World Heritage Site "Historic Centre of Odesa" and its buffer zone. Among the damaged sites, 4 have the status of architectural monuments of national significance: the Vorontsov Palace, which is an architectural monument of the early 19th century, as well as the Palace on 9 Prymorskyi Boulevard, the Rodokonaki House, the building of the Londonska Hotel.

Following the above-mentioned facts of damage to UNESCO World Heritage Sites, the Commissioner sent letters to UNESCO Director-General Audrey Azoulay calling for prompt and effective action to respond to these crimes at the international level.

Therefore, the issue of developing scientific and project documentation to determine the boundaries and modes of use of buffer zones of UNESCO World Heritage Sites, which is necessary to ensure the preservation of their authenticity, integrity and outstanding universal value, remains relevant. The above-mentioned recommendation was provided by the Commissioner in the Annual Report for 2024.

The Ministry of Culture reported that it had developed a draft resolution of the Government of Ukraine "On Qualification Requirements for Scientific and Project, Research Organizations that are Developers of Scientific and Project (Research)

Documentation in the field of Cultural Heritage Protection". At a meeting of the Government Committee on National Unity, Information Policy and Culture on April 16, 2025, it was decided to submit the draft act for consideration by the Government after finalizing its individual provisions.

5.6.2. Right to Access Cultural Property

On March 28, 2025, the Government of Ukraine, by Resolution No. 293-p, approved the Strategy for the Development of Culture in Ukraine for the Period until 2030 (hereinafter referred to as the Strategy) and approved an operational plan of measures for its implementation in 2025–2027.

The Strategy is aimed at restoring, preserving and developing the cultural potential of Ukraine under the legal regime of martial law and post-war reconstruction, as well as at integrating Ukrainian culture into the European and global cultural space.

The Commissioner provided relevant proposals to the draft Strategy at the stage of its development, in particular, regarding the need to develop and implement a general register of cultural values stolen from Ukraine during the armed aggression of the Russian Federation.

The above-mentioned issues were established by the Commissioner based on the results of non-on-site monitoring of compliance with the right of individual and citizen to access cultural values and cultural heritage under martial law.

From the analysis of the Ministry of Culture's response on the status of implementation of the Commissioner's recommendations, it was inferred that the Government of Ukraine adopted Resolution No. 1389 of October 29, 2025 "On the Implementation of a Pilot Project on the Introduction of the Register of the Museum Fund of Ukraine", which entered into force on October 31, 2025.

As of today, the priority is to fill the Register of the Museum Fund of Ukraine system with information about museum objects of the state part of the Museum Fund of Ukraine that have acquired the status of stolen, lost as a result of World War II, stolen as a result of the armed aggression of the Russian Federation, not detected during the last verification of the presence of objects with the museum's fund and accounting documentation. The list of stolen museum objects of the state part of the Museum Fund of Ukraine is currently being formed.

5.6.3. Right to Library Services under the Legal Regime of Martial Law

The Commissioner conducted 3 non-on-site monitoring of citizens' rights to library services under the legal regime of martial law.

The monitoring covered 6 national, 20 regional and 14 public libraries (a total of 40 monitoring objects).

The results of the monitoring of national libraries identified a number of problematic issues, in particular:

- inadequate state of preservation of documentary heritage objects;

- lack of a unified database for accounting of documentary cultural heritage objects and limited access to documentary heritage objects;
- unsatisfactory state of formation of library funds;
- low level of material and technical support;
- reduction in human resources and reduction of the network of library institutions.

Questions were raised in public and regional libraries regarding the availability of regional cultural development programs, official websites, funding status, creation of a barrier-free environment, and cooperation with the public sector. The results are shown in the table.

	Monitoring Issue	Public libraries (14 monitoring objects)	Regional libraries (20 monitoring objects)
	Regional cultural development programs approved	10 (71%)	17 (85%)
	Official website available	8 (57%)	20 (100%)
	Adequate funding	11 (79%)	14 (70%)
	Adaptation for free access of persons with disabilities and low-mobility groups to library services available	8 (57%)	14 (70%)
	Cooperation with public organizations and creative unions established	14 (100%)	20 (100%)

Analysis of information received from monitoring objects showed that visits to public libraries increased annually during 2022-2024, while visits to regional libraries, on the contrary, decreased.

Based on the monitoring results, the Commissioner provided recommendations to the Ministry of Culture.

In response, the Ministry of Culture reported that the recommendations have been processed and will be taken into account when forming state policy in the field of librarianship, as well as when preparing relevant regulatory legal acts, strategic documents and making organizational and managerial decisions.

5.7. Right to Education

During 2025, the Commissioner received 315 appeals from citizens about violations of their rights in the field of professional (vocational and technical), professional pre-higher and higher education. Most of the appeals concerned:

- the right of applicants from preferential categories to receive state support in the field of education, including free education;
- the right to education for persons with disabilities/special education needs;
- scholarship provision, including the right to social scholarships;
- renewal, transfer to study, choice of form of education (full-time/part-time).

5.7.1. Rights of Persons with Disabilities or Special Educational Needs to Education

In 2025, the Commissioner monitored compliance with the right of persons with disabilities/SEN to obtain professional pre-higher education and the third (educational-scientific/educational-creative) level of higher education..

1) To Professional Pre-Higher Education

Based on the results of comprehensive monitoring of 25 professional pre-higher education institutions of all forms of ownership in 13 regions of Ukraine, the Commissioner identified a number of problematic issues that affect the quality of education for persons with disabilities or SEN:

1) insufficient staffing, namely the lack of experts (teaching assistants, correctional teachers, tutors, practical psychologists, social workers) who have experience working with students with disabilities/special needs;

2) inadequate funding, which results in:

- a lack of sufficient electronic educational materials in accessible formats (educational materials in Braille, with audio playback, with subtitles; interactive programs for autistic students, sign language translations for video lectures);

- a lack of high-quality methodological materials and practical instructions for adapting educational and professional programs;

- a lack of shelters adapted for the category of persons with disabilities/SEN in 14 institutions, which is 56 percent of all monitoring objects;

3) the issue of ensuring the availability/functioning of a teaching assistant at the level of professional pre-higher education is not regulated by regulations.

Based on the results of the monitoring, the Commissioner provided relevant recommendations to the Ministry of Education and Science, which were taken into account and reported that the issue of creating conditions for the accessibility of obtaining professional pre-higher education by persons with disabilities and/or SEN is among the priority tasks of the ministry. Of the total number of professional pre-higher education institutions, nearly 75 percent are accessible to persons with SEN. Also, it is planned to hold events (seminars, webinars, etc.) for specialists working in an inclusive educational environment aimed at improving their qualifications in working with persons with disabilities/SEN.

The issue of the functioning of a teaching assistant in professional pre-higher education institutions remains unresolved.

2) To the Third (Educational and Scientific) Level of Higher Education

The Commissioner received numerous applications from potential applicants for the third (educational and scientific) level of higher education who are persons with disabilities.

From the applications, it was established that the applicants had difficulties in exercising their right to take an entrance exam at a higher education institution instead of a Single Entrance Exam (hereinafter referred to as the SEE), provided for by the Procedure and Conditions for Admission to Higher Education in 2025, approved by Order of the Ministry of Education and Science No. 168 of February 10, 2025 (hereinafter referred to as the Procedure).

Thus, potential postgraduate students with disabilities, in order to obtain the opportunity to take an entrance exam at a higher education institution instead of the SEE, first had to apply to the selected higher education institution with a corresponding application. The next step was for the higher education institution to apply to the Ministry of Education and Science for the relevant permission to conduct an entrance exam at a higher education institution.

Permission was granted by the Ministry of Education and Science on the condition that an applicant with a disability was denied by the regulatory commission at the relevant regional centre for the assessment of the quality of education regarding the creation of special conditions for passing the entrance exam using external independent assessment technologies (with the mandatory provision of copies of relevant supporting documents).

The Commissioner established that neither the applicants nor the higher education institutions were properly informed about such an algorithm. This led to a loss of time for applicants and could result in a violation of their right to education.

On the issue raised, the Commissioner, in addition to direct requests for specific applications from applicants, sent initiative letters with proposals for resolving the outlined issues.

The Ministry of Education and Science responded by informing that the outlined problematic issues regarding the improvement of the admission mechanism for obtaining the third level of higher education by persons with disabilities were taken into account when forming the draft 2026 Procedure for Admission to Higher Education.

The Commissioner was addressed by citizen P., a person with a disability of the Category I (vision issues), who, due to her health condition, needed special conditions for passing the entrance exams. In order to exercise her right to enter a higher education institution, the applicant first contacted the Commissioner in May 2025 regarding the possibility of conducting an entrance exam at a higher education institution instead of the SEE on scientific research methodology. At the request of the Commissioner, the Ministry of Education and Science, the relevant recommendations were provided to the University and permission was granted to conduct the exam directly at the higher education institution.

At the same time, after passing the exam, the applicant faced new obstacles in exercising her right to enter the University: there was no technical possibility in the USEDE to register her application for participation in the entrance exams. In September, citizen P. applied to the Commissioner again. As a result, the Ministry of Education and Science granted permission for her to participate in the competitive selection for the degree of Doctor of Philosophy on the basis of a paper-form

application and enrolment in the University by paper-form order with the subsequent creation of a higher education applicant's profile in the USEDE.

5.7.2. Rights for Professional Pre-Higher and Higher Education to Resume and/or Transfer to Full-Time Education

On the issue of assistance in maintaining the rights to transfer/renew to full-time education, the Commissioner received numerous applications from citizens who have reached the age of 25 but are not subject to military service, which indicates a systemic problem.

The grounds for refusing to renew/transfer applicants were the provisions of the Order of the Ministry of Education and Science "On Certain Issues of Acquiring and Renewing the Status of an Education Seeker" No. 910 of June 24, 2024 (hereinafter referred to as Order No. 910).

Thus, the provisions of Order No. 910, in particular, stipulate that for the period of the legal regime of martial law in Ukraine, the resumption (including admission to the educational process after the end of the period of interruption of education) of full-time or dual forms of education is temporarily suspended, except for certain categories, which, in particular, include persons who, as of the date of resumption, have not reached the age limit for the commencement of basic military service, determined by Article 15 of the Law of Ukraine "On Military Duty and Military Service" No. 2232-XII of March 25, 1992 (hereinafter referred to as Law No. 2232-XII), provided that there is information about previous studies in the USEDE.

Within the framework of consideration of the above-mentioned appeals, initiative letters were sent to the Ministry of Education and Science regarding amendments to Order No. 910 regarding the possibility of resuming studies and transferring to full-time education of applicants for professional pre-higher and higher education who have reached the age limit for the commencement of basic military service, but are not subject to military service.

In its responses, the Ministry of Education and Science noted that for the period of the legal regime of martial law, the constitutional rights and freedoms of individual and citizen may be limited, in particular the right to education guaranteed by Article 53 of the Constitution of Ukraine. Therefore, in accordance with Order No. 910, the resumption (including admission to the educational process after the end of the period of interruption of studies) of full-time or dual forms of education by persons, except for certain categories listed directly in the regulatory legal act, has been temporarily suspended (for the period of validity of the legal regime of martial law in Ukraine).

It can be inferred that the position of the Ministry of Education and Science regarding the absence of grounds for amending Order No. 910 remains unchanged.

In view of the above, on December 19, 2025, the Commissioner made a submission to the Ministry of Education and Science with a request to take measures to amend Order No. 910 in terms of ensuring the possibility of transferring and resuming full-time education for applicants for professional pre-higher and higher education who have

reached the age limit for the commencement of basic military service, determined by Article 15 of Law No. 2232, and are not subject to military service.

The Commissioner is considering the appeal of citizen Ya. regarding the violation of her right to receive higher education in the field of arts. The applicant wishes to resume full-time studies in the specialization 025 "Musical Arts", professional field "Concert and Chamber Singing".

Before being expelled (January 2025), the applicant was at the second (master's) level higher education student at the I.P. Kotlyarevskiy Kharkiv National University of Arts (hereinafter referred to as the KNUA). She received education full-time. At the same time, the KNUA refused the applicant to resume her full-time studies with reference to the provisions of Order No. 910.

The applicant has reached the age limit for basic military service, but is not subject to military service.

In addition, the professional specialization "Concert and Chamber Singing", in which the applicant wishes to obtain education, does not provide for a non-in-person form of education, which actually makes it impossible for her to continue her studies.

5.8. Right to Work

Under the legal regime of martial law, starting in 2022, the Commissioner received 2,780 appeals from citizens stating violations of the right to work (1,136 in 2022; 544 in 2023; 516 in 2024 and in 2025 - 584). In 2025, their number increased by 68 compared to 2024.

Analysis of appeals shows that the issue of wage arrears has not been resolved for years, this problem is especially acute for employees of destroyed enterprises. Arrears in payment of social security contributions lead to a violation of social guarantees for employees. For the second year in a row, appeals have been received from affected employees of critical infrastructure facilities and their family members regarding violations of the right to receive one-time assistance. According to the results of parliamentary control, facts of violation of the right of citizens to receive wages, the right to vacation, to have insurance coverage period credited, and violations in the employment of vulnerable categories of the population were established.

5.8.1. Right to a One-Time Cash Assistance for Employees of Critical Infrastructure Facilities

With the adoption of the Law of Ukraine "On One-Time Cash Assistance for Harm to Life and Health Caused to Employees of Critical Infrastructure Facilities, Civil Servants, and Local Government Officials as a Result of the Military Aggression of the Russian Federation against Ukraine" No. 2980-IX of March 20, 2023 (hereinafter referred

to as Law No. 2980-IX), which establishes additional social protection for employees of critical infrastructure facilities, civil servants, and local government officials, the Commissioner began to receive applications mainly from OKI employees and their family members.

The applications reported that the PFU bodies were refusing to assign them cash assistance. During the consideration of the applications and monitoring, it was found that:

- The Government of Ukraine adopted subordinate regulatory acts untimely. Thus, Law No. 2980-IX, adopted on March 20, 2023, entered into force on May 1, 2023, and the Procedure for the appointment and payment of one-time cash assistance for harm to life and health caused to employees of critical infrastructure facilities, civil servants, and local government officials as a result of the military aggression of the Russian Federation against Ukraine was approved only on December 27, 2023 under No. 1396 (hereinafter referred to as the Procedure No. 1396);

- the Procedure for the payment of the difference in receiving one-time cash assistance under various regulatory legal acts has not been developed;

On January 31, 2025, the Commissioner was contacted by citizen Sh., the wife of a civil servant who died as a result of a missile strike on the building of the Mykolaiv Regional State Administration. The applicant reported that the PFU body refused to assign a one-time benefit, since she had already been paid benefits under the Law of Ukraine "On Mandatory State Social Insurance" No. 1105-XIV of September 23, 1999, and the employer also provided material assistance. Based on the recommendations of the Commissioner, the Ministry of Social Policy clarified the payment procedure for the PFU, which does not take into account material assistance provided by employers. The applicant's right was restored.

As of June 2025, the PFU had reviewed 26 decisions with a similar problem.

- employees of contracting organizations who were at the critical infrastructure facilities during the event and were injured are not subject to Law No. 2980-IX (for example, employed in security, cleaning, etc.), therefore, they remain unprotected;

- separate structural units of the critical infrastructure facilities are not included in the Register of Critical Infrastructure Facilities, provided for by the Resolution of the Government of Ukraine "On Approval of the Procedure for Maintaining the Register of Critical Infrastructure Facilities, Entering Such Facilities in the Register, Accessing and Providing Information from It" No. 415 of April 28, 2023;

On June 11, 2025, citizen Sh. addressed the Commissioner, reporting that her husband, an employee of a municipal production water supply and sewage enterprise, had died on March 7, 2022 while performing his official duties. The Act of Special Investigation of September 7, 2023 states that the accident at work was related to armed aggression. On August 12, 2024, the PFU body refused a one-time cash benefit due to the absence of the enterprise in the Register of Critical Infrastructure Facilities.

In course of the Commissioner's proceedings, it was revealed that the enterprise did not provide sufficient supporting calculations regarding the classification of the enterprise into the category of critical infrastructure facilities. Within the proceedings, recommendations were provided to the Ministry of Development as a sectoral body, as well as the Ministry of Social Policy.

- the three-year term for the right to receive a one-time cash benefit needs to be clarified. Law No. 2980-IX stipulates that persons who have the right to the appointment and payment of a one-time cash benefit can exercise it within three years from the date when a person became eligible to exercise such a right. Procedure No. 1396 specifies that the implementation of such a right is carried out from the date of establishment of disability or death of a person after February 24, 2022 (Paragraph 2 of Point 8). However, Law No. 2980-IX, adopted on March 20, 2023, entered into force on May 1, 2023, Procedure No. 1396 entered into force on January 1, 2024.

On August 5, 2025, citizen B. addressed the Commissioner, alleging that his wife, an employee of the critical infrastructure facility, died on March 12, 2022. The PFU body refused to assign the applicant a one-time cash benefit due to the expiration of the three-year period.

The Commissioner provided recommendations to the Ministry of Social Policy on the procedure for reviewing the three-year period.

On August 21, 2025, the Commissioner informed the Temporary Special Commission of the Parliament of Ukraine on the Protection of Property and Non-Property Rights of Internally Displaced Persons and Other Persons Affected by the Armed Aggression of the Russian Federation against Ukraine about the results of parliamentary control over the observance of the rights of critical infrastructure facilities' employees and their family members when determining the right to receive one-time assistance and provided recommendations on the need for legislative changes, which are taken into account in the Law of Ukraine "On Amendments to the Law of Ukraine "On One-Time Cash Benefit for Damage to Life and Health Caused to Employees of Critical Infrastructure Facilities, Civil Servants, and Local Government Officials as a Result of the Military Aggression of the Russian Federation against Ukraine" No. 4793-IX of February 25, 2026.

5.8.2. Right to Remuneration

(a) Right to Timely Payment of Wages

The issues of timely payment of wages and repayment of arrears in wages remain among the most acute in the field of labour relations. Since the beginning of the full-scale invasion, there have been no current official statistics on the amounts of arrears in wages. As of January 1, 2025, such arrears, excluding part of the temporarily occupied territories, amounted to UAH 4.4 billion (as of January 1, 2024 - UAH 3.9 billion).

During 2025, the issue of repayment of arrears in wages was considered at 12 meetings of the Interdepartmental Working Group on Repayment of Wage Arrears (Monetary Support), which is a temporary advisory and consultative body of the Government of Ukraine in the field of coordination of actions of executive bodies regarding the timely payment of wages. At the same time, despite holding a number of meetings and preparing recommendations, there has been no systemic improvement in this regard.

The problem of wage arrears at destroyed enterprises or enterprises located in areas of active hostilities has not been resolved.

In response to the Commissioner's appeal to the Ministry of Economy on resolving the issue of repaying wage arrears that arose before the full-scale invasion, the Ministry of Economy, referring to Part 4 of Article 10 of the Law of Ukraine "On the Organization of Labor Relations under Martial Law" No. 2136-IX of March 15, 2022 (hereinafter referred to as Law No. 2136-IX), believes that in the event of impossibility of timely payment of wages due to hostilities, the term of payment of wages may be postponed until the enterprise in question resumes its activities.

The scale of the full or partial destruction of a number of enterprises indicates the improbability of their restoration. There is a need to develop a program to repay the arrears in wages that arose before the full-scale invasion. The issue of repaying the arrears in wages can be resolved by providing funds for the relevant expenses in the Budget Declaration and the State Budget of Ukraine, as well as by amending the legislation to expand the powers of the State Labor Service of Ukraine to carry out unscheduled state supervision (control) measures in the event of arrears to employees.

Citizen Ch., a former coal industry employee, appealed to the Commissioner regarding the violation of the right to payment of all amounts due to him upon dismissal. The applicant reported that the arrears in wages arose even prior to the full-scale invasion. At the time of the appeal, the employees of the enterprise were being evacuated, as the enterprise was located in an active hostilities area.

(b) Right to Remuneration of Employees of Concert Organizations

According to Part 3 of Article 29 of the Law of Ukraine "On Culture" No. 2778-VI of December 14, 2010 (hereinafter referred to as Law No. 2778-VI), employees in the field of culture, pedagogical employees of educational institutions in the field of culture who work in public and municipal cultural institutions have the right to health care assistance during annual leave in the amount of their official salary, as well as material assistance for resolving social and household issues and a seniority supplement in the amounts and in the manner established by the Government of Ukraine.

In the course of proceedings initiated upon the application of the head of a regional philharmonic society, it was revealed that the seniority supplement, health care assistance during annual leave and material assistance for resolving social and household issues to professional creative employees of state and municipal concert organizations and circuses, as well as circus organizations, remains unregulated. The Ministry of Culture

believes that the issue of additional payments established by Law No. 2778-VI in 2010 can be resolved after the end of the legal regime of martial law.

5.8.3 Right to Include Periods of Work in the Insurance Coverage Period (Labor Experience)

(a) Confirmation of Insurance Coverage Period (Labor Experience)

During the year, the Commissioner received applications from citizens regarding the violation of their right to confirmation of insurance coverage period (labor experience). Among the main reasons for the violation of workers' rights: employers ignoring employees' requests, failure to transfer documents of liquidated enterprises to the archives, failure to systematize documents as a result of their transfer to safe storage places, loss of enterprise archives during martial law.

In March 2025, the Commissioner was addressed by citizen Sh., who could not obtain a certificate confirming his work experience at JSC "Ukrainian Railways" due to the disorganization of the transferred archival documents from Sumy region. Thanks to the Commissioner's recommendations, the employer organized the systematization of archival documents and prepared the appropriate certificate.

(b) Counting of Insurance Coverage Period

The Commissioner received appeals from citizens and trade union organizations regarding the violation of the rights of insured persons in connection with the non-crediting of employees' insurance coverage period in the event of non-payment of the USC by the employer. According to the State Tax Service, as of January 1, 2026, 615.6 thousand entities had debts for the payment of social security contributions in the amount of UAH 20.7 billion. The timeliness and completeness of the payment of USC by the employer has a direct impact on the amount of pensions of future and current pensioners, on the amount of unemployment benefits.

In accordance with the recommendation of the Commissioner, provided in the Annual Report on the Status of Observance and Protection of Rights and Freedoms of Individual and Citizen in Ukraine in 2023, a draft Law of Ukraine "On Amendments to the Law of Ukraine "On Mandatory State Pension Insurance"" (reg. No. 13705-д of October 31, 2025) has been developed regarding confirmation of insurance coverage period, which provides for the possibility of counting periods of work towards insurance coverage period even if there is arrears in USC payment, provided that the insured submits a report on the accrual of insurance premiums in the amount of not less than the minimum insurance premium in accordance with the legislation. Employees of the Commissioner's Secretariat joined the working group to finalize the said draft law for the second reading, and the comments and suggestions provided to it have been taken into account.

This project needs to be considered as soon as possible, as the implementation of its provisions will contribute to more effective protection of workers' rights and reduce social tension due to untimely payment of contributions.

5.8.4. Right to Work of the Elderly Persons

In 2025, the Commissioner, within the framework of parliamentary control, monitored compliance with the right of elderly citizens to employment, guaranteed by the Law of Ukraine "On the Basic Principles of Social Protection of Labor Veterans and Other Elderly Citizens in Ukraine" No. 3721-XII of December 16, 1993. According to the national demographic forecast, by 2030 the share of people over 60 years of age in Ukraine will be 26 percent, and people aged 65 and older – 20 percent.

In conditions of inflation and rising prices, pension payments to the elderly persons often do not cover basic needs. Work allows such people to remain financially independent and provide for themselves independently.

In 2025, the Commissioner carried out remote monitoring of the status of compliance with the right to work of elderly people, the results of which established:

- the absence of a program document aimed at compliance with the rights of elderly citizens to work on an equal basis with other citizens;
- the absence of additional legislative guarantees in promoting the employment of elderly citizens and incentives for employers to employ such persons;
- the absence of vocational training programs for elderly people.

5.9. Right to Property

The results of the parliamentary control carried out by the Commissioner have revealed violations of human and civil rights in the areas of housing rights, land relations and state supervision (control), in particular, under the legal regime of martial law. The identified violations concerned the exercise of citizens' rights to privatize housing, improper and unequal application of the procedure for resolving land disputes by the local self-government bodies, the establishment of additional requirements in the area of placement of temporary structures for conducting business activities, as well as in the implementation of unscheduled state supervision (control) measures, which leads to violations of citizens' rights in the areas of environmental protection, urban development and land use.

5.9.1. Housing Rights

The current legislation stipulates that the privatization of residential premises is carried out by the privatization bodies of local self-government. At the same time, a significant number of residential premises subject to privatization by citizens residing in them are state-owned, which makes it impossible for the privatization bodies of local self-government to make relevant decisions. The resolution of these issues requires the transfer of such premises from state to municipal ownership; however, state authorities

and local self-government bodies apply a formal approach, which leads to a significant delay in procedures.

The Commissioner received a collective appeal from residents of a residential building on 1 Mykola Vasylenko Str. in Kyiv regarding the inaction of state authorities and local governments on the issue of transferring the building to the communal property of the territorial community of Kyiv for the purpose of further privatization of residential premises.

In accordance with the Commissioner's recommendations, the State Property Fund of Ukraine issued Order No. 2337 of December 22, 2025 on the transfer from state to communal property of the territorial community of Kyiv of parts of the residential building (entrances 3 and 4) with a total area of 2601.9 sq. m together with the heating network, currently on the balance sheet of the State Enterprise "Kyiv Automobile Repair Plant".

The Solomyanskyi District State Administration in the City of Kyiv drew up an act of acceptance and transfer of part of the residential building on 1 Mykola Vasylenko Str. in Kyiv to the communal property of the territorial community of Kyiv, which was signed by the members of the Commission on the acceptance of housing stock into the communal property of the territorial community.

By order of the Solomyanskyi District State Administration in the City of Kyiv No. 104 of February 17, 2026, the relevant act of acceptance and transfer was approved.

Thus, the residents of the building can exercise their right to housing through its privatization.

5.9.2. Rights in the Field of Land Relations

(a) Powers of Local Self-Government Bodies in Resolving Land Disputes

The Commissioner receives complaints from citizens regarding the lack of proper response of local self-government bodies in resolving land disputes. The analysis of complaints has shown the use of different approaches to the consideration of such disputes, despite the presence of relevant regulations in the Land Code of Ukraine No. 2768-III of October 25, 2001 (hereinafter referred to as the LC of Ukraine). In accordance with Part 3 of Article 158 and Clause ж) of Part 1 of Article 12 of the Land Code of Ukraine, the powers to resolve land disputes within territorial communities belong to village, settlement and city councils. At the same time, Subclause 5 of Clause 6) of Part 1 of Article 33 of the Law of Ukraine "On Local Self-Government in Ukraine" No. 280/97-BP of May 21, 1997 (hereinafter referred to as the Law No. 280/97-BP) assigns such powers to the executive bodies of the relevant councils. Therefore, there exists a conflict between the norms of the LC of Ukraine and the aforementioned Law regarding the definition of the entity authorized to resolve land disputes.

In addition, Article 159 of the LC of Ukraine determines only the general terms of consideration of land disputes, without establishing a clear procedural order for making decisions based on the results of their consideration.

The totality of the above-mentioned shortcomings of legislative regulation makes it impossible to form a unified approach to considering land disputes at the local level and leads to the adoption of unlawful decisions and incorrect determination of the competence of bodies.

In order to exercise the relevant powers under the decisions of the councils or their executive committees, the so-called coordination (conciliation) commissions are formed, entrusted with the consideration and resolution of land disputes on the merits. At the same time, such commissions are of a consultative and advisory nature and are not endowed with authority, and the registration of their decisions in the form of protocols or acts does not meet the requirements of Article 59 of Law No. 280/97-BP, according to which councils and their executive committees shall adopt acts in the form of decisions.

In order to form a unified approach of local self-government bodies to the implementation of powers in the field of resolving land disputes, effectively implement the powers defined by Law No. 280/97-BP, and the requirements of the LC of Ukraine in terms of resolving land disputes, and effectively protect land ownership rights, the LC of Ukraine requires amendments and additions to specify the procedure for considering land disputes by local self-government bodies.

(b) Right to Place Temporary Structures

The Law of Ukraine "On Regulation of Urban Planning Activities" No. 3038-VI of February 17, 2011 (hereinafter referred to as Law No. 3038-VI) stipulates that the placement of temporary structures for conducting business activities shall be carried out in accordance with the procedure established by the central executive authority that ensures the formation of state policy in the field of urban planning.

The Order of the Ministry of Regional Development, Construction and Housing and Communal Services of Ukraine No. 244 of October 21, 2011 approved the Procedure for the Placement of Temporary Structures for Conducting Business Activities (hereinafter referred to as the Procedure), which determines the mechanism for the placement of temporary structures for conducting business activities.

During the parliamentary control, the Commissioner found out that individual local governments, going beyond the powers granted to them, approve local rules and procedures that establish additional or complicated requirements for the placement of temporary structures not provided for by the acts of the central executive authority.

The Commissioner received an appeal from a resident of Odesa regarding the unlawful refusal of structural units of the Odesa City Council to allow the placement of temporary structures for conducting business activities. In course of the proceedings of the Commissioner, it was revealed that the Rules for Placing Temporary Structures for Conducting Business Activities in the City of Odesa, approved by the decision of the Odesa City Council No. 3961-VI of October 9, 2013 (hereinafter referred to as the Rules), contain additional requirements compared to those specified in the Procedure, which contradicts the current legislation.

At the request of the Commissioner, the State Regulatory Service of Ukraine (hereinafter referred to as the SRS) conducted a check of the compliance of the Rules with the requirements of the legislation, as a result of which a submission was made to the Odesa City Council on the need to cancel the decision of the Odesa City

Council, by which the Rules were approved, due to their non-compliance with the requirements of the legislation.

The Odesa City Council rejected the SRS submission.

However, the City Council agreed to bring the Rules into line with the requirements of the legislation and develop appropriate changes, the preparation of which is scheduled for the first half of 2026.

5.9.3. Peculiarities of Implementing State Supervision (Control) Measures under the Legal Regime of Martial Law

The need to review the restrictions on the implementation of state supervision (control) established by the Resolution of the Government of Ukraine No. 303 of March 13, 2022 "On the Termination of State Supervision (Control) Measures Under Martial Law" (hereinafter referred to as Resolution No. 303) was highlighted in the Annual Reports for the years 2022, 2023, and 2024. Besides, the Commissioner sent letters to the Prime Minister of Ukraine and the Ministry of Economy with a proposal to limit the application of the ban on state supervision (control) measures only to territories where hostilities are active or where there is a threat of their occurrence. In other territories, the procedure specified in the Law of Ukraine "On the Basic Principles of State Supervision (Control) in the Sphere of Economic Activity" No. 877-V of April 5, 2007 (hereinafter referred to as Law No. 877-V) should be applied. Relevant amendments to Resolution No. 303 have not yet been made.

Simplifying the conditions for conducting economic activities by limiting unscheduled state supervision (control) measures under martial law in many cases leads to abuses by business entities, as evidenced by numerous appeals to the Commissioner. This situation leads to violations of citizens' rights in the areas of urban planning and environmental protection.

a) State Architectural and Construction Control

The Commissioner received appeals from citizens regarding the refusals of the State Inspectorate for Architecture and Urban Planning of Ukraine (hereinafter referred to as the SIAUP) on the conduct of unscheduled state architectural and construction supervision activities in the field of urban development. Such refusals were motivated by the absence of a threat that has a negative impact on the rights, legitimate interests, life and health of an individual, the environment or the security of the state. The specified requirements are stipulated by the Order of the Ministry of Development of Communities, Territories and Infrastructure of Ukraine No. 424 of May 19, 2023 (hereinafter referred to as the Order No. 424), issued in implementation of Paragraph 2 of Resolution No. 303.

At the same time, in accordance with Article 41-1 of Law No. 3038-VI, state architectural and construction supervision is an activity aimed at verifying compliance with the requirements of the legislation by state and local architectural bodies and other bodies exercising control in the field of urban planning activities, and such legal relations do not belong to measures of state supervision (control) within the meaning of Law No.

877-V, the effect of which is limited by Resolution No. 303 This position is also supported by the Ministry of Economy of Ukraine (before reorganization) and the SRS.

Therefore, the organization and conduct of unscheduled measures of state architectural and construction supervision should be carried out in accordance with the Procedure for State Architectural and Construction Supervision, approved by the Resolution of the Government of Ukraine No. 698 of August 19, 2015, which does not provide for the mandatory presence of a threat or additional approval as conditions for conducting such measures. The establishment by Order No. 424 of additional requirements for conducting unscheduled inspections contradicts the current legislation and restricts the rights of citizens in the field of urban development.

In this regard, the Commissioner made a submission to the Ministry of Development to bring Order No. 424 into line with the requirements of the legislation. The Ministry refused to grant it, citing the lack of a clear range of subjects of legal relations in respect of whom it is permitted to conduct unscheduled measures of state supervision (control).

Despite repeated appeals by the Commissioner with relevant legal justifications and taking into account the positions of other authorities, the issue remains unresolved.

b) State Supervision (Control) over Compliance with Environmental Protection Legislation

Within the framework of the ongoing proceedings of the Commissioner on the basis of citizens' appeals, it was revealed that the Ministry of Economy did not make a corresponding decision on unscheduled control measures for 6 materials on violations of environmental legislation by business entities sent by the State Environmental Inspectorate.

With a view to clarifying the general situation regarding the decision-making of the Ministry of Economy on the appeals of the State Environmental Inspectorate, information was received that during August-November 2025, the State Environmental Inspectorate sent 49 materials to the Ministry of Economy on the implementation of unscheduled state supervision (control) measures regarding business entities, and a decision was made only regarding two.

The Commissioner received appeals from residents of the city of Rozhyshche, Volyn region, regarding the violation of their right to a safe environment for life and health by "Woodland Ukraine" LLC due to air pollution, noise, non-compliance with the sanitary protection zone from the territory of the enterprise, violation of the Law of Ukraine "On Environmental Impact Assessment".

In response to the Commissioner, the Rozhyshche City Council conducted a commission inspection of LLC "Woodland Ukraine" on June 16, 2025 with the participation of representatives of the State Environmental Inspectorate in Volyn region. It was established that the maximum permissible concentration of undifferentiated dust and equivalent sound levels was exceeded in the territory of the residential development; an increased content of nitrates was detected in drinking

water from the well. In addition, the Volyn Regional State Administration informed the Commissioner that in 2023-2024 the enterprise did not submit a report on compliance with the conditions of the permit for emissions of pollutants into the atmospheric air.

The State Environmental Inspectorate sent materials to the Ministry of Economy for approval of the inspection of "Woodland Ukraine" LLC on September 2, 2025. Information about the decision made is not available as of January 12, 2026.

Failure to adopt the decision by the Ministry of Economy results in a continuing violation of the right of citizens to a safe environment.

5.10. Consumer Rights

Since 2022, the Commissioner has received 4,702 applications from citizens stating violations of their rights as consumers of goods, works and services (1,696 in 2022; 836 in 2023; 951 in 2024; 1,219 in 2025). In 2025, their number increased by 268 compared to 2024. In the applications received in 2025, applicants reported problems related to the accrual of debt and the termination of the provision of housing and communal services, non-fulfilment or improper fulfilment of obligations by suppliers, as well as violations of consumer rights when servicing credit obligations in banks and financial institutions under the legal regime of martial law.

5.10.1. Rights in the Sphere of Banking and Financial Services

(a) Consumers Who Received Loans in Crypto Assets

Citizens have been appealing to the Commissioner regarding the violation of their rights as consumers of financial services by foreign companies, in particular, Crypsee and BitCapital, which provide loans in crypto assets.

Citizens complained that these companies demand significant amounts of money, particularly in foreign currency, apply moral and psychological pressure, engage in blackmail, distribute personal photos, threaten with physical violence, etc.

Within the framework of the Commissioner's monitoring, it was established that more than 10 foreign companies operate in Ukraine without an appropriate license and registration in the State Register of Financial Service Providers, offering citizens loans through their websites (internet services) and mobile applications.

According to the NBU, the problem of illegal activities of such companies is systemic and has existed for a long time.

During the period from January 1, 2022 to November 19, 2025, the NBU received almost 3,000 complaints from citizens regarding violations of their rights as consumers of financial services. The largest number of complaints was made against the Crypsee (1,579) and BitCapital (2,042) services.

The Commissioner provided recommendations to the NBU on taking measures aimed at terminating the activities of online services and ensuring the protection of the rights of affected consumers of financial services.

The NBU took response measures, including contacting the authorized bodies of the United Kingdom, in whose territory these services are registered, namely the Financial

Conduct Authority. The Regulator also contacted the Ministry of Internal Affairs, the National Police, the Cyber Police Department of the National Police and the Ministry of Digital Transformation, which, in turn, contacted Google to assist in resolving the situation regarding the blocking of the BitCapital mobile application without an appropriate license in the Play Market service on the territory of Ukraine. But these services continue their illegal activities on the territory of Ukraine and violate consumer rights.

The reason is the lack of proper legal regulation of the virtual assets market in Ukraine, since the Law of Ukraine "On Virtual Assets" No. 2074-IX of February 17, 2022 comes into force from the date of entry into force of the Law of Ukraine on Amendments to the Tax Code of Ukraine regarding the features of taxation of transactions with virtual assets, the draft of which is under consideration in the Parliament of Ukraine (reg. No. 10225-д of April 24, 2025).

(b) Access to Banking and Financial Services by Persons with Disabilities

In course of the consideration of citizens' appeals, as well as within the framework of monitoring the media, systemic problematic issues were identified regarding ensuring the accessibility of banking, financial and supporting services for persons with disabilities, relating to the inaccessibility of identification procedures as a barrier to the exercise of the right of a person with disabilities to banking services and the lack of a mechanism for incapacitated persons to access banking and digital financial services through a legal representative.

On the Inaccessibility of Identification Procedures as a Barrier to the Exercise of the Right of a Person with a Disability to Banking Services.

During the media monitoring, the Commissioner revealed a violation of the right of a 20-year-old Defender of Ukraine, who lost his upper and lower limbs as a result of hostilities, to the issue and receipt of a bank card for state social benefits.

It was established that when applying to a branch of JSC CB "PryvatBank" in Kyiv to restore a bank card lost during hostilities, the bank employees demanded that he undergo a photo identification procedure ("photo with a bank card"), which is physically impossible for a person without upper limbs. In this regard, the Defender of Ukraine was refused a bank card.

Given the systemic nature of such violations of the rights of persons with disabilities, the Commissioner provided recommendations to the NBU and JSC CB "PryvatBank" to review the practice of using photo identification, introduce alternative identification mechanisms, and ensure proper service for persons with disabilities.

Following the response of the Commissioner and public awareness, the Defender of Ukraine was issued a bank card, and the management of the NBU and JSC CB "PryvatBank" publicly apologized. The NBU announced increased control over banks' compliance with the rights of persons with disabilities, in particular by including issues of accessibility of banking services in inspections from 2026. JSC CB "PrivatBank" began reviewing internal identification procedures and initiated the creation of special financial spaces for Defenders of Ukraine.

On the Lack of a Mechanism for Legally Incapacitated Persons to Access Banking and Digital Financial Services through a Legal Representative.

The Commissioner was contacted by a guardian of a legally incapacitated person with a disability of Category I, an IDP, regarding the impossibility of issuing a Diia.Card for crediting state social payments, in particular the "Winter Support" one-time cash benefit.

The banking institutions to which the applicant applied refused to issue a Diia.Card, citing the lack of technical possibility of issuing such a banking product through a legal representative and the need to use digital services by the person themselves.

The Commissioner provided recommendations to the NBU on ensuring the implementation of the right of guardians to issue bank cards for legally incapacitated persons. The NBU confirmed the impossibility of opening a Diia.Card on behalf of an incapacitated person upon the guardian's request. The Ministry of Digital Affairs was informed about the need to optimize state digital services in order to ensure the right of guardians to open a Diia.Card on behalf of the persons they represent.

The examples above demonstrate the existence of systemic problems in ensuring the accessibility of banking and financial services for persons with disabilities, caused by the failure to take into account the special needs of such persons when implementing identification procedures, as well as the imperfection of regulatory and technical regulation of digital financial services..

5.10.2. Rights in the Field of Housing and Communal Services

(a) Refund of Overpayment to Household Consumers of Natural Gas

The Commissioner received a significant number of complaints from citizens regarding the failure of natural gas suppliers to refund overpayments or erroneously paid funds after changing gas suppliers.

In course of the Commissioner's monitoring, it was established that the problem of regional gas distributors failing to refund erroneously paid funds is systemic and is related to the automatic transfer of about 9 million households to the Naftogaz of Ukraine gas supply company as the sole supplier in 2022. Due to inadequate information to the population, a significant number of household consumers continued to make payments to previous suppliers.

According to the National Commission for the Regulation of Energy and Utilities of Ukraine, from May 2022 to December 2025, the Regulator received 3,424 complaints from household consumers regarding the failure to refund overpayments by 16 regional gas distributors. The largest number of complaints concerned the activities of: "Rivnegaz zbut" LLC - 1,195; "Dnipropetrovskgaz zbut" LLC - 717; "Kyivoblgaz zbut" LLC - 313; "Ivano-Frankivskgaz zbut" LLC - 224; "Chernihivgaz zbut" LLC - 197.

The estimated amount of overpayments exceeds UAH 1.4 billion.

Despite the inspections and application of sanctions by the National Commission for the Regulation of Energy and Utilities of Ukraine, regional gas distributors actually

do not fulfill the requirements for the return of funds, appeal the Regulator's decisions in court and refer to force majeure circumstances or shift responsibility to other entities.

As a result, thousands of household consumers, mainly pensioners and the elderly persons, have been deprived of the opportunity to return their own funds for a long time, which leads to social tension and a decrease in trust in providers of housing and communal services.

In this regard, the Commissioner provided recommendations to the Ministry of Energy on resolving the specified systemic problem.

However, the Ministry of Energy has distanced itself from solving the systemic problem of refunding overpayments to natural gas consumers, citing limitations on its powers in relation to gas supply companies.

(b) Payment for Electricity at a Preferential Price

Residents of apartment buildings that are not gasified and not connected to centralized or autonomous heating systems and use electricity to heat their homes are basically deprived of the opportunity to exercise the right to purchase electricity at a fixed price specified in Appendix 3 to the Regulation on Imposing Special Obligations on Electricity Market Participants, approved by the Resolution of the Government of Ukraine No. 483 of June 5, 2019 (hereinafter referred to as Appendix 3 to the Regulation), due to the ineffectiveness of the mechanism for confirming the fact of the absence of gasification and heat supply, which should be provided by regional and district councils..

The Commissioner was contacted by a resident of the city of Stryi, Lviv region, who lives in an apartment building that is not gasified and is not connected to centralized or autonomous heating systems, and therefore the housing is heated exclusively by electricity in the winter.

It was established that the applicant was unable to exercise the right to purchase electricity at a preferential (fixed) price due to the absence of a designated body and an approved procedure for confirming the fact of the absence of gasification and heat supply in the apartment building. Bodies of local self-government reported that they lack the relevant powers and normative regulation.

Within the framework of the proceedings, the Commissioner provided recommendations to the Lviv Regional Council on resolving the issue of providing a relevant opinion, as well as to the Ministry of Energy - on amending Appendix 3 to the Regulation in order to grant such powers to village, settlement, and city councils.

The Ministry of Energy did not support the Commissioner's proposal, citing the risks of unjustified expansion of the circle of consumers of the preferential tariff and possible corruption abuses. As a result, the applicant remains deprived of the opportunity to benefit from the preferential price for electricity, and the problem, which is of a systemic nature, has not been resolved.

It has been established that the distribution system operator does not apply a preferential price for electricity even provided the availability of supporting documents.

Residents of an apartment building in Kharkiv region appealed to the Commissioner regarding the violation of their right to purchase electricity at a fixed (reduced) price, as provided for in Appendix 3 to the Regulation.

It was established that, since 2012, the applicants had been legally using the preferential tariff on the basis of technical documentation and the act of the State Energy Supervision Inspectorate of Ukraine, which confirmed the absence of gasification and the non-functioning of centralized heating systems. The technical characteristics of the building had not changed since its commissioning.

At the same time, in 2025, the Derhachi Energy Unit of the "Kharkivoblenergo" JSC made changes to the passports of distribution points without proper legal and technical grounds, which made it impossible to further apply the fixed tariff. Despite the applicants receiving the conclusion of the Kharkiv District Council on the absence of gasification and heating, the distribution system operator refused to restore the preferential tariff.

As part of the proceedings, the Commissioner provided recommendations to the National Commission for State Regulation in the Energy and Utilities Sectors on conducting an inspection of the actions of the "Kharkivoblenergo" JSC and taking response measures to restore the rights of the applicants. Thanks to the Commissioner's intervention, the rights of consumers were restored, but the fixed price for electricity began to be applied not from the beginning of the heating season, but only from January 1, 2026.

The examples above demonstrate the ineffectiveness of the mechanism for implementing the right of residents of non-gasified apartment buildings to pay for electricity at a preferential (fixed) price, as well as the formal approach of individual distribution system operators, which leads to the unjustified deprivation of consumers of the right to enjoy a preferential tariff for electricity.

5.10.3. Rights of Consumers of Transport Services

Due to the lack of an approved Procedure for regulating the activities of bus stations, as well as improper control (inspections) over their activities, the rights of consumers of passenger road transportation services are violated. In particular, this leads to an inadequate level of service, as well as the lack of safe and accessible conditions for passengers at bus stations.

The public organization "Ukrainian Consumer" appealed to the Commissioner regarding the violation of passengers' rights to safe, high-quality and affordable services at the "Persha" and "Kiltseva" bus stations in the city of Kyiv.

It was established that the specified bus stations do not meet the requirements of the Law of Ukraine "On Road Transport" No. 2344-III of April 5, 2001, in particular, there are no proper waiting rooms, restrooms, ticket offices, information on the schedule, carriers and tariffs, staff, as well as accessibility conditions for passengers. Such conditions make it impossible to provide safe and high-quality services and create risks for passengers.

As part of the proceedings, the Commissioner appealed to the State Service of Ukraine for Transport Safety with recommendations to conduct an inspection of the activities of the relevant bus stations. At the same time, the State Service of Ukraine for Transport Safety reported that there were no legal grounds for conducting inspections due to the loss of validity in 2020 of the Procedure for Regulating the Activities of Bus Stations, approved by Order of the Ministry of Transport and Communications of Ukraine No. 700 of September 27, 2010, and the absence of a new regulatory legal act.

During the Commissioner's monitoring, it was established that there is no effective state control over the activities of bus stations and mandatory requirements for their functioning. The electronic List of Bus Stations, introduced by Resolution of the Government of Ukraine No. 1046 of September 10, 2024 "On Amendments to the Resolutions of the Government of Ukraine No. 176 of February 18, 1997 and No. 103 of February 11, 2015", is voluntary and does not reflect the real number of such facilities.

In this regard, the Commissioner provided recommendations to the Ministry of Development on the normative regulation of the activities of bus stations and the definition of the powers of regulatory bodies.

The Ministry of Development was informed about the preparation of a pilot project to inspect bus stations, but it does not solve the outlined problem.

5.10.4. Citizens' Rights in the Sphere of Funeral Affairs

The Commissioner received complaints from citizens regarding the violation of their rights as users of burial grounds, in particular in the sectors of military burials, as well as in relation to spontaneous cemeteries that do not have the proper legal status.

Violation of the Rights of a User of a Burial Ground in the Sector of Military Burials Established

The father of a deceased serviceman appealed to the Commissioner regarding the violation of his right as a user of a burial ground in the cemetery in the town of Starokostyantyniv, Khmelnytskyi region.

It was established that a capital metal structure was unlawfully installed on an adjacent plot, and its area significantly exceeds the standard area of the burial ground and makes it impossible to access and care for the grave of the applicant's son, causes flooding and erosion of the soil, and violates the requirements of the legislation in the field of funerals.

As part of the proceedings, the Commissioner provided recommendations to the Starokostyantyniv City Council to verify the specified information, which confirmed the fact of the violation. At the same time, no effective response measures were taken for a long time. Additionally, the fact of the unlawful installation of a video surveillance camera directed at the burial site, which has signs of interference in private life, was established.

In order to restore the rights of the applicant, the Commissioner submitted a submission to the city council on bringing the burial sites into compliance with the legislation and terminating unlawful video surveillance.

Following the results of the response, the city council sent a statement of claim to the court for the dismantling of the unlawfully installed structure and an appeal to law enforcement agencies regarding unlawful video surveillance.

Facts of the Burial of Citizens in a Spontaneous Cemetery and the Lack of Proper Control by Local Government Bodies Established

The applicant addressed the Commissioner regarding the violation of her rights as a user of a burial site due to the improper maintenance of her grandmother's grave at a cemetery in the Kryvyi Rih community.

During the proceedings, it was established that for over 40 years, burials have been carried out on a land plot that does not have the status of a cemetery and is located on forestry lands that are in permanent use of the State Enterprise "Forests of Ukraine". The Dnipropetrovsk Regional Military Administration confirmed the violation of land, sanitary and environmental legislation and noted that the specified territory is subject to closure and liquidation in accordance with the legislation.

The Commissioner provided recommendations to the Dnipropetrovsk Regional Military Administration and the Kryvyi Rih City Council on resolving issues of accounting, maintenance and protection of burial sites, as well as stopping unlawful burials. Despite the recommendations provided and the relevant instructions of the Regional Military Administration, the Kryvyi Rih City Council did not take the necessary measures.

Due to the inaction of the local government, the spontaneous cemetery continues to function.

The examples given indicate the existence of systemic problems in the field of burial, caused by the improper execution of the powers of local self-government bodies regarding the registration, maintenance and protection of burial grounds, the lack of effective mechanisms for responding to the unauthorized actions of burial ground users, as well as the long-term existence of spontaneous cemeteries without legal status and proper control. This situation leads to a violation of the right of relatives of the deceased to respect for the memory of the buried persons, worthy commemoration and legal certainty in the field of funeral affairs.

RECOMMENDATIONS:

To the Verkhovna Rada of Ukraine:

to consider the draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine Regarding Travel Payment Benefits and Certain Other Benefits" (reg. No. 5651-2 of June 25, 2021);

to consider the draft Law of Ukraine "On Amendments to the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine Regarding the Regulation of the Turnover of Virtual Assets in Ukraine" (reg. No. 10225-д of April 24, 2025);

not to include provisions on amending or suspending the operation of other laws that guarantee the right to social protection when developing and adopting the law on the State Budget of Ukraine for the relevant year.

To the Cabinet of Ministers of Ukraine:

to develop and submit to the Parliament of Ukraine draft laws on:

amendments to the Law of Ukraine "On Mandatory State Pension Insurance" in order to regulate the issue of withholding from citizens the amounts of pensions paid for the past period in the event of the cancellation of disability groups previously established for citizens by expert commissions for assessing the daily functioning of a person;

amendments to the Law of Ukraine "On the Status and Social Protection of Citizens Affected by the Chornobyl Disaster" No. 796-XI of February 28, 1991 in order to govern the issues of making additional payments to pensions to non-working pensioners living in the radioactive contamination zone as a result of the Chornobyl disaster, as well as maintaining social guarantees in the event that, after conducting dosimetric passporting, the territories where they live are excluded from the list of settlements that have been subjected to such radioactive contamination;

amendments to the Law of Ukraine "On Environmental Impact Assessment" to strengthen control over economic entities in terms of conducting post-project monitoring;

amendments to the Law of Ukraine "On Waste Management" regarding the delimitation of powers of state authorities and local self-government bodies in matters of collection, transportation and/or processing of waste, the owner of which has not been indentified;

amendments to the Land Code of Ukraine regarding the granting of executive bodies of local self-government bodies the powers to resolve land disputes, as well as the definition of the procedure for their resolution;

to develop and adopt resolutions/orders regarding:

granting central executive bodies the authority to approve, amend and cancel national classifiers in their areas of competence;

providing persons affected by the Chornobyl disaster with medicines, in particular insulin, free of charge;

approving qualification requirements for scientific and design, research organizations that are developers of scientific and design (research) documentation in the field of cultural heritage protection;

the amount and procedure for calculating additional payments, providing material assistance to professional creative employees of state and municipal concert organizations and circuses, as well as circus organizations;

a program document aimed at respecting the rights of elderly citizens to work on an equal basis with other citizens;

a mechanism for returning overpayments to gas consumers and establishing the responsibility of suppliers for untimely refunds;

regulation of the activities of bus stations, establishing requirements for their functioning, safety, accessibility and quality of service, with the designation of an authorized body to monitor compliance with the rights of consumers of bus station services.

to amend the resolutions of the Government of Ukraine:

No. 1417 of December 29, 2009 "Certain Issues of the Activities of Territorial Social Service Centres (Provision of Social Services)" regarding the conditions and procedure for the provision of social services that contradict the Law of Ukraine "On Social Services";

No. 1338 of November 15, 2024 "Certain Issues of the Introduction of the Assessment of the Daily Functioning of a Person" in terms of determining the list of documents confirming that a person belongs to the category of those who cannot be admitted for the assessment of the daily functioning of a person, and the maximum terms for reviewing the decisions of expert teams on the assessment of the daily functioning of a person based on the results of considering complaints;

No. 1802 of December 26, 2025 "On Amendments to the Licensing Conditions for Conducting Economic Activities in the Production of Medicines, Wholesale and Retail Trade in Medicines, and Import of Medicines (Except for Active Pharmaceutical Ingredients)" in terms of expanding the list of medicines that can be sold in pharmacies located in medical and preventive institutions;

No. 298 of March 17, 2011 "On Approval of the Procedure for Using Funds Provided in the State Budget to Ensure the Implementation of Medical Measures of Individual State Programs and Comprehensive Program Measures" in terms of establishing the deadlines for submitting applications to the MoH and SE "Medical Procurement of Ukraine" for the purchase of medicines and medical devices;

No. 483 of June 5, 2019 "On Approval of the Regulation on Imposing Special Obligations on Participants in the Electricity Market to Ensure General Public Interests in the Operation of the Electricity Market", in terms of confirming the fact of the absence of gasification apartment buildings and the absence or non-functioning of centralized heating systems or autonomous heating systems in the said buildings, which use any types of energy carriers, except electricity, by city, town and village councils.

To the Ministry of Economy, Environment and Agriculture of Ukraine:

to amend the Orders No. 263 of February 10, 2025 "On Approval of the Rules for Technical Operation of Landfills, Termination of Operation, Reclamation and Care of Landfills after Termination of Their Operation" and No. 455 of April 29, 2024 "On Approval of the Requirements for the Plan for Bringing the Waste Disposal Site into Compliance with the Requirements of the Legislation" in terms of their entry into force;

to identify zones vulnerable to (the accumulation of) nitrates and create their register; to establish state monitoring of nitrate pollution of groundwater and surface waters.

To the Ministry for Development of Communities and Territories of Ukraine:

to bring Order No. 424 of May 19, 2023, “On the Conduct of Unscheduled State Architectural and Construction Control (Supervision) Measures During the Period of Martial Law” into compliance with the Law of Ukraine “On the Basic Principles of State Supervision (Control) in the Sphere of Economic Activity”;

to amend the Procedure for the Maintenance of Cemeteries and Other Burial Sites, approved by Order No. 193 of the State Housing and Communal Services of Ukraine dated November 19, 2003, to improve control mechanisms by local self-government bodies and cemetery operators, defining liability for violations of landscaping, the erection of structures, and the improper maintenance of cemeteries.

To the Ministry of Education and Science of Ukraine:

to develop and approve a regulatory legal act to regulate the introduction of the position of a teaching assistant into the staffing schedules of professional pre-higher education institutions;

to amend Order No. 910 of 24 June 2024 “On Certain Aspects of Acquiring and Renewing Student Status” to ensure the possibility of transfer to and reinstatement in full-time study for students of professional pre-higher and higher education who have reached the age limit for conscription to basic military service and are not subject to military duty.

To the Ministry of Social Policy, Family and Unity of Ukraine:

to refine, in collaboration with the Pension Fund of Ukraine and the State Border Guard Service of Ukraine, a mechanism for the exchange of information regarding citizens’ stays abroad for the purposes of granting housing subsidies and other forms of social support.

To the Ministry of Health of Ukraine:

to launch a public information campaign regarding the provision, free of charge under the State Guarantees Programme for Medical Care, of the medical services package entitled “Infertility treatment using assisted reproductive technologies (in vitro fertilisation)”.

To the National Bank of Ukraine:

to ensure that systematic guidance and explanatory work is carried out with banks regarding the application of financial monitoring approaches, taking into account the needs of people with disabilities, in particular by organising thematic seminars;

to introduce an assessment of the accessibility of banking services for people with disabilities.

To the Regional Military Administrations of Donetsk, Kirovohrad, Luhansk, Mykolaiv, Poltava, Sumy, Kherson, Khmelnytskyi, Cherkasy, and Chernihiv Regions:

to create the conditions in regional cluster and supra-cluster hospitals to conclude contracts with the NHSU for the medical services package “Infertility treatment using assisted reproductive technologies (in vitro fertilisation)”.

To the Regional Military Administrations of Vinnytsia, Volyn, Dnipropetrovsk, Donetsk, Luhansk, Zhytomyr, Kyiv, Kirovohrad, Mykolaiv, Odesa, Sumy, Ternopil, Kharkiv, Khmelnytskyi, Cherkasy, Chernivtsi, and Chernihiv Regions:

to approve regional waste management plans.

6. NATIONAL PREVENTIVE MECHANISM. HUMAN RIGHTS IN PLACES OF DETENTION

Number of appeals	47
Number of compiled protocols	1
Number of provided recommendations	5 960
Number of processed draft regulatory legal acts	19
Number of monitoring activities (on-site and off-site)	626
Number of responses from the Commissioner (submissions)	62

6.1. National Preventive Mechanism

6.1.1. Implementation of the NPM's Mandate in Accordance with the Optional Protocol to the UN Convention Against Torture (OPCAT)

The Optional Protocol to the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment (hereinafter – Optional Protocol) provides for the establishment of a system of regular visits to places of detention carried out by independent international and national bodies, with the aim of preventing torture and other cruel, inhuman or degrading treatment or punishment.

Under the Law of Ukraine “On the Ukrainian Parliament Commissioner for Human Rights”, the functions of the NPM, as set out in the Optional Protocol, are entrusted to the Commissioner.

To fulfil the functions of the NPM, the Commissioner carries out regular visits to places of detention without prior notice of the time and purpose of the visits and without limitation on their number, with the aim of preventing torture and other cruel, inhuman or degrading treatment or punishment.

The NPM of Ukraine operates under the “Ombudsman+” model. This model provides for the NPM's functions to be carried out by the Commissioner in collaboration with civil society organisations.

The Optional Protocol sets out provisions regarding the state's guarantee of the functional independence of NPMs, as well as the independence of their staff.

The Law of Ukraine “On the Ukrainian Parliament Commissioner for Human Rights” enshrines the independence of the Commissioner's activities from other state bodies, the independent decision-making regarding the issuance of mandates to representatives of civil society organisations to participate in visits to places of detention,

the funding of the NPM under a separate budget programme, the independent planning of visits and unhindered access to places of detention.

Funding for the NPM's activities is provided under the budget programme "Measures for the implementation of the National Preventive Mechanism". Since the introduction of a separate budgetary funding programme in 2019, funding has increased annually (2020 – 1,567,000 UAH, 2021 – 3,282,000 UAH, 2022 – 3,282,000 UAH), however, following the full-scale invasion by the Russian Federation, for objective reasons, the trend has shifted towards a decrease (2023 – 2,658,000 UAH, 2024 – 2,658,000 UAH, 2025 – 2,393,000 UAH).

The special subdivision responsible for implementing the NPM functions of the Commissioner's Secretariat, namely the NPM Department, has 24 staff positions, of which 18 are filled. Visits by the NPM to the regions are carried out by staff of the Unit for the Support of Regional Offices and Representatives of the Commissioner in the relevant region, totalling 103 people.

In 2025, visits to the NPM involved 156 representatives of civil society organisations and 4 specialists and experts.

A special online course entitled "Basic Principles of the National Preventive Mechanism" has been developed for those wishing to participate in the NPM's activities, as well as for newly appointed staff of the Commissioner's Secretariat.

The Commissioner's Secretariat, in collaboration with civil society organisations, is conducting training for representatives of civil society organisations who wish to participate in the NPM's visits to places of detention (basic training). The training is delivered according to a specially designed programme and takes place in two stages: online and offline. Anyone who meets the established criteria may join the online part of the training. Participants who have successfully completed the online training are invited to take part in the offline part. Participants who successfully complete both parts of the training are recommended to the Commissioner for the purpose of carrying out visits to places of detention as part of the NPM.

In 2025, a series of training sessions was held for members of the NPM on the practice of monitoring human rights compliance in the provision of psychiatric care.

Staff of the NPM Department have introduced quarterly training sessions for staff of the regional representative offices of the Commissioner's Secretariat and representatives of civil society organisations participating in visits. These training sessions are aimed at sharing the positive experience gained by NPM Department staff, discussing issues relating to the conduct of visits, preparing reports based on their findings, and so on.

Currently, productive work is underway to develop in-depth thematic courses for staff at places of detention on the prevention of torture and other cruel, inhuman or degrading treatment or punishment.

6.1.2. Indicators of NPM Activities in the Reporting Period

In 2025, the Commissioner's Secretariat carried out 626 visits to places of detention, broken down by region as follows: Vinnytsia – 22, Volyn – 34, Dnipropetrovsk – 45, Donetsk – 4, Zhytomyr – 29, Zakarpattia – 35, Zaporizhzhia – 13, Ivano-Frankivsk – 29, Kyiv – 21, Kirovohrad – 14, Lviv – 30, Mykolaiv – 23, Odesa – 31, Poltava – 40, Rivne – 34, Sumy – 17, Ternopil – 22, Kharkiv – 41, Kherson – 2, Khmelnytskyi – 36, Cherkasy – 19, Chernivtsi – 26, Chernihiv – 35, Kyiv – 24.

NPM visits were carried out to places of detention under the jurisdiction of the following authorities:

Ministry of Social Policy, Family and Unity of Ukraine – 186;

State Judicial Administration of Ukraine – 141;

Ministry of Health of Ukraine – 23;

Ministry of Justice of Ukraine – 67;

Ministry of Education and Science of Ukraine – 10;

National Police of Ukraine – 125;

Ministry of Defence of Ukraine – 13;

State Migration Service of Ukraine – 6;

State Border Guard Service of Ukraine – 4;

Security Service of Ukraine – 2;

State Bureau of Investigation – 1;

privately owned institutions – 48.

For comparison, the Commissioner's Secretariat, in collaboration with civil society representatives, carried out 345 visits to places of detention in 2022, 538 in 2023, and 543 in 2024.

Regional (cluster) visits to places of detention were carried out in 10 regions: Vinnytsia, Volyn, Khmelnytskyi, Poltava, Rivne, Kharkiv, Ivano-Frankivsk, Dnipropetrovsk, Lviv and Zakarpattia.

The NPM's visits covered all regions of Ukraine, except for the temporarily occupied territories.

NPM teams identified systemic violations of human and civil rights and freedoms in places of detention, in particular the rights: to protection from torture, cruel or degrading treatment or punishment; to an adequate standard of living; to liberty and personal integrity; to health care and medical assistance; to life and safe conditions of detention; to work and protection from exploitation; the rights of persons with disabilities and people with reduced mobility; and others.

Following the visit, the NPM draws up a report on the findings of the visit to the place of detention, including recommendations that must be implemented to remedy the identified violations of human and civil rights.

The Commissioner shall submit to state authorities, enterprises, institutions and organisations, regardless of their form of ownership:

proposals on the prevention of torture and other cruel, inhuman or degrading treatment or punishment;

letters initiating disciplinary proceedings, proceedings in cases of administrative offences, and reports of criminal offences;

submissions regarding the elimination of identified violations of human and civil rights and freedoms.

In 2025, the Commissioner issued **62** submissions to state authorities, local government bodies, enterprises, institutions and organisations, regardless of their form of ownership, calling for measures to be taken to remedy the identified violations.

According to the Commissioner, law enforcement authorities have entered information into the Unified Register of Pre-Trial Investigations and initiated 10 criminal proceedings.

In accordance with Article 191 of the Law of Ukraine “On the Ukrainian Parliament Commissioner for Human Rights”, the NPM cooperates with the SPT, exchanging information on systemic issues and best practices; it utilises the conclusions of the CPT and SPT, as well as the case law of the ECtHR, in its own reports and recommendations to the authorities.

Each month, the Commissioner’s Secretariat informs the CPT and the SPT about the activities of the NPM of Ukraine (the number of visits carried out, identified violations of fundamental human and civil rights, action plans submitted to address them, as well as specific violations and photographic evidence), and also submits an annual special report on the state of affairs regarding the prevention of torture and other cruel, inhuman or degrading treatment or punishment in Ukraine, as part of informing the CPT and SPT about the human rights situation in places of detention.

During 2025, representatives of the Commissioner’s Secretariat took part in international events within the framework of the European Forum of NPMs, organised by the Council of Europe in Strasbourg, France. With the support of the Council of Europe, a study visit to the Republic of Croatia was carried out in 2025 to exchange experience with the Croatian NPM, which provided an opportunity to deepen international cooperation between national human rights institutions.

In connection with the start of negotiations on Ukraine’s accession to the EU, and in accordance with the recommendations of the European Commission set out in the Progress Report on Ukraine as part of the 2024 European Union Enlargement Package, the Secretariat of the Commissioner has included, in the preparation of the Roadmap on

the Rule of Law, under the “Fundamental Rights” section within Area 3.2. “Prevention of torture and ill-treatment and the penitentiary system”, the Commissioner’s Secretariat included a measure to review the functioning of the NPM.

In implementation of this measure, in 2025 international consultants of the Council of Europe conducted an external assessment of the NPM’s activities and prepared a relevant report, which is an important prerequisite for opening and conducting negotiations on Ukraine’s EU membership within Cluster 1 “Foundations of the EU accession process”.

Cooperation with civil society is an integral part of the NPM’s work. In 2025, meetings and round-table discussions were jointly organised to address issues relating to the observance of human rights in places of detention and ways of resolving them.

In collaboration with the “Let’s Help” Charitable Foundation, with the aim of raising awareness of the requirements for respecting the rights of older people and people with disabilities when providing them with social care services in public and private institutions, the educational project “Human Rights in Geriatric Care Facilities” was implemented in 2025, comprising 10 training sessions held in various regions of Ukraine (Ivano-Frankivsk, Chernivtsi, Lviv, Cherkasy, Uzhhorod, Khmelnytskyi, Zhytomyr, Rivne, Ternopil, Kyiv), attended by representatives of public and private sector institutions providing social care services.

6.2. State of Human Rights Observance in Places of Detention by Sector of Administration

6.2.1. Places of Detention Under the Jurisdiction of the Ministry of Justice of Ukraine

The results of the NPM’s visits in 2025 indicate that the MinJust of Ukraine has effectively failed to address systemic human rights violations in institutions under the authority of the Department for the Enforcement of Criminal Sentences. Despite numerous responses from the Commissioner and repeated recommendations from international organisations, throughout 2025 the MinJust of Ukraine failed to bring about any tangible changes in the area of respect for the rights of prisoners and convicted persons. Systemic problems remain unresolved, indicating a lack of adequate institutional response and effective management decisions on the part of the responsible authority.

The systematic documentation by NPM groups of human rights violations in reports following visits to penitentiary institutions, published on the Commissioner’s official website, confirms the persistent systemic nature of such violations and the lack of an adequate managerial response from the MinJust of Ukraine.

It should be noted that, within the framework of European integration processes, the state continues to implement roadmaps in the areas of the rule of law, public administration reform and the functioning of democratic institutions, which are prerequisites for membership negotiations.

Section 23, “Judiciary and Fundamental Rights”, of the European Commission’s 2025 Report on Ukraine calls for the establishment of an effective system to prevent and combat torture and ill-treatment, the improvement of conditions of detention in RC and PE, and the implementation of the Council of Europe’s recommendations. Failure to implement these measures will pose risks to Ukraine’s swift accession to the EU.

As of 31 December 2025, the MinJust of Ukraine’s system comprises 24 RCs, 52 PEs, 5 camps for the detention of prisoners of war, 4 correctional centres and 1 re-education colony, holding a total of 34,925 persons. During 2025, NPM teams visited 45 RCs and PEs.

According to the results of visits carried out in 2025 by NPM delegation, no cases of torture were recorded in RCs and PEs. During confidential interviews with convicted prisoners and detainees, no reports of physical violence by staff were received.

Similar conclusions were reflected in the CPT’s 2024 report. The delegation noted that its representatives had received no reports of ill-treatment by staff. The vast majority of prisoners interviewed stated that staff treated them correctly. Furthermore, physical violence between prisoners did not appear to be a serious problem in most of the institutions visited.

Further analysis of the results of the NPM’s visits in 2025 provides grounds for identifying certain types of human rights violations that are systemic in nature and require priority attention. One such violation is the practice of prolonged solitary confinement of juvenile prisoners.

6.2.2. The Prolonged Solitary Confinement of Juvenile Prisoners

During group visits to PEs by the NPM’s teams in 2025, cases were recorded of prolonged solitary confinement of juvenile prisoners who had been held in isolation for several months.

It is recommended that the administrations of penitentiary institutions take measures to ensure that no juvenile is held in conditions akin to solitary confinement. Prolonged solitary confinement of juveniles amounts to cruel, inhuman or degrading treatment or punishment, adversely affects their psychological and physical health, and should be used only in exceptional cases for the shortest possible period, subject to mandatory assessment by a psychologist.

During confidential interviews with juvenile prisoners at the Ivano-Frankivsk Correctional Institution (No. 12), the NPM team noted that three juveniles had been held in solitary confinement for around five months.

During its visit to places of detention in Ukraine in 2023, the CPT recommended in its report that the use of solitary confinement for minors should be avoided. In cases where isolation is necessary, juvenile prisoners should be given the opportunity, under the appropriate supervision of staff, to interact with adult prisoners of the same gender.

In accordance with the United Nations Standard Minimum Rules for the Treatment of Prisoners (the Nelson Mandela Rules), the practice of prolonged or indefinite solitary confinement should be prohibited.

6.2.3. Segregation and Discrimination Among Detainees

Discrimination, segregation and stigmatisation of detainees continue to be practised in penitentiary institutions, driven by the existence of an informal prison hierarchy. Certain categories of prisoners face systematic oppression in the day-to-day life of the institutions, in particular through the imposition of degrading duties such as cleaning toilets and communal areas, isolation from the majority of prisoners, eating at separate tables, as well as constant ridicule and psychological pressure from other prisoners and even PE's staff.

This constitutes discrimination, as a specific group of prisoners is subject to unjustified restrictions on the exercise and enjoyment of universally recognised fundamental rights and freedoms on a permanent basis, which occurs amid the inaction or tacit consent of the prison administration and contravenes the state's obligation to ensure equal treatment and respect for the human dignity of every individual.

During confidential interviews with prisoners belonging to a particularly vulnerable group at the SI "Drohobych Correctional Colony (No. 40)", it was established that, during social and educational activities, their ability to leave their living quarters and take part in these activities is restricted.

In its report, the CPT emphasised the need to address the phenomenon of informal hierarchies among prisoners and recommended the development and implementation of a comprehensive strategy to combat violence, intimidation and discrimination. In this context, the prison administration must ensure proper risk and needs assessment, as well as an effective system for the classification and allocation of prisoners.

Similar violations were the subject of consideration by the ECtHR in the case of “S.P. and others v. Russia”, in which it was held that stigmatisation, segregation and the lack of effective protection for particularly vulnerable categories of detainees constitute a violation of Article 3 of the Convention for the Protection of Human Rights and Fundamental Freedoms.

Furthermore, on the recommendation of the Commissioner, the Operational Plan for the implementation in 2025 and 2026 of the Strategy for Reforming the Penitentiary System for the period up to 2026, approved by Order of the Cabinet of Ministers of Ukraine No. 1188-r of 29 October 2025, the development and implementation of a comprehensive strategy to counter the negative influence of criminal subculture and the informal prison hierarchy has been included, which provides for the rationalisation of the assessment of risks and the needs of prisoners, their classification and allocation with the aim of preventing the influence of other inmates who may cause harm.

6.2.4. Inadequate Conditions of Detention in Penitentiary Establishment (PE) and Remand Centres (RCs), and Discrimination on the Basis of Financial Status

During visits to RCs (PEs), inadequate conditions of detention were found in the cells in the majority of them, namely: overcrowding, inadequate sanitary and hygienic conditions, limited access to natural light and fresh air, poor condition of sanitary facilities, lack of or worn-out furniture and bedding, as well as a lack of privacy.

Particular attention should be drawn to the systematic failure to comply with the established standards for living space per detainee, which is a systemic issue.

During a visit to the SI “Kyiv Remand Centre”, it was found that the cells designated for newly arrived detainees there were approximately 30 prisoners held, despite a maximum permitted capacity of 16, resulting in approximately 1.3 m² of space per person.

The management of the MinJust of Ukraine has failed to take the necessary measures to bring the standards for living space in cells into line with national and European standards.

In accordance with Article 11(2) of the Law of Ukraine “On Pre-Trial Detention”, the minimum living space per detainee in a cell must not be less than 2.5 m². At the same time, since its first visit to Ukraine in 1998, the CPT has recommended increasing the minimum living space per detainee to 4 m². This recommendation has been reiterated in subsequent reports in 2000, 2005, 2009, 2013, 2017 and 2023.

Particular attention should be paid to the fact that persons in custody have not been found guilty of committing a criminal offence, and that the preventive measure of detention is applied solely for procedural purposes.

It should be noted that the problem of overcrowding in cells is systemic in nature and is observed not only in RCs but also in penal colonies.

One of the reasons for this situation is the reduction of the network of correctional colonies. In particular, since 2014, on the initiative of the management of the MinJust of Ukraine, the operation of 41 institutions has been gradually terminated, and convicted persons have been transferred to serve their sentences in institutions in other regions. As a result, the concentration of detainees in functioning correctional colonies has led to excessive pressure on the housing stock and systematic violations of statutory living space standards.

Violations of living space standards are also associated with the presence, in almost every institution, of residential buildings that, due to various circumstances, are not in use.

During a visit to the SI “Poltava Penitentiary Institution (No. 23)”, the NPM team established that there is a high-security wing on the institution’s premises which has not yet been put into operation due to unfinished renovation work. The unit is a three-storey building with a total area of 473 m², capable of accommodating 52 cells for prisoners serving life sentences.

Putting the block into operation would help avoid breaches of the standards for living space per prisoner or detainee, as during the visit to one of the cells, the actual space per detainee was only 1.8 m².

While most people in RCs are held in inadequate conditions, since 2020 the MinJust of Ukraine has introduced a fee-based service offering improved conditions of detention in RC’s cells.

These cells, for which a detainee pays a monthly fee, are equipped to provide at least 6 m² of living space per person.

In addition, such cells are equipped with a computer workstation, a shower cubicle, an electric water heater, a fridge, a microwave oven, a multi-cooker, a television, internet access and telephone facilities, etc.

Consequently, the majority of detainees held in RCs are afforded fewer rights, opportunities or benefits than those who pay for improved conditions of detention, and are subjected to discrimination on the basis of their financial circumstances.

In order to address this issue and bring national standards into line with European standards, in 2025 the Commissioner submitted a proposal to the MinJust of Ukraine to

amend the Law of Ukraine “On Pre-Trial Detention”, with a view to increasing the space requirements for detainees, from 2.5 m² to 4 m² per person.

The MinJust of Ukraine is taking measures aimed at reducing the occupancy rate of the country’s largest RC — the SI “Kyiv Remand Centre” — through the conversion of Boryspil Correctional Colony No. 119 into a RC, which will help to reduce overcrowding and improve detention conditions.

In particular, the MinJust of Ukraine has announced that the issue of ensuring an increase in space standards has been included in the operational plan for the implementation, in 2025 and 2026, of the Strategy for Reforming the Penitentiary System for the period up to 2026, approved by the Order of the KMU (Government of Ukraine) of 29 October 2025.

6.2.5. Violations of the Right of Prisoners and Convicted Persons to Work

During visits to penitentiary institutions by NPM teams, it has once again been noted that the issue of respecting the labour rights of convicted persons and prisoners remains unresolved and is systemic in nature. In the vast majority of cases, the deployment of prisoners to perform production work continues to take place without proper documentation; working hours continue to systematically exceed the limits set by law; remuneration for work often does not correspond to the actual volume of work performed; and working conditions remain such that they do not meet occupational health and safety requirements.

During confidential interviews with prisoners employed in the canteen at the SI “Stryzhavska Correctional Colony (No. 81)”, it was established that their actual working day lasts around 14 hours, and they work six days a week. Consequently, the total working hours amount to around 80 hours per week, which is twice the limit set by law.

In accordance with Article 52 of the Labour Code of Ukraine, in a six-day working week, the daily working time may not exceed 7 hours where the weekly working time is 40 hours, 6 hours where the weekly working time is 36 hours, and 4 hours where the weekly working time is 24 hours.

With a view to developing comprehensive and coordinated solutions to address the violations identified by the Commissioner’s Secretariat and civil society organisations, an inter-agency working group on the realisation of prisoners’ right to work was established in 2025. Representatives of central executive bodies, in particular the State Labour Service of Ukraine, the Office of the Prosecutor General and the Department for the Enforcement of Criminal Sentences, are involved in the group’s work with the aim of

developing practical recommendations and improving regulatory and legal frameworks. Following the meetings to be held in 2026, it is envisaged that joint proposals will be drawn up aimed at improving working conditions for prisoners and bringing the practice of organising such work into line with national and international standards.

6.2.6. Violation of the Right to Respect for Private Life

Article 32 of the Constitution of Ukraine stipulates that no one may be subjected to interference in their private and family life, except in cases provided for by the Constitution of Ukraine.

Throughout 2025, NPM teams recorded the systematic use of round-the-clock video surveillance in cells within RCs and PEs. This practice is being implemented in the absence of clear and comprehensive regulatory provisions governing the procedure for its application, the grounds for its use and the mechanism for reviewing its use.

Round-the-clock video surveillance effectively deprives convicted prisoners and detainees of their right to respect for private life, which creates a risk of undermining human dignity.

At the same time, video surveillance in cells may be justified in exceptional cases, in particular where there is a reasonable risk of harm to a person, an attempt at suicide or a threat to safety. However, the decision to apply such a measure must be based on an individual risk assessment, be duly justified, be time-limited and subject to regular review.

Furthermore, Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms stipulates that everyone has the right to respect for their private and family life, their home and their correspondence.

In its case law, the ECtHR has noted that round-the-clock video surveillance of prisoners and convicted persons in their cells constitutes a violation of Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms (for example, the case of *Van der Graaf v. the Netherlands* (application no. 8704/03)).

In view of the above, the existence in national legislation of provisions permitting the use of round-the-clock video surveillance in cells and living premises of RCs and PEs is incompatible with international human rights standards. Such a practice is regarded as a violation of the right to respect for private life, guaranteed by Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms. Should this practice continue, there is a high risk that ECtHR will deliver numerous judgments against Ukraine under the aforementioned article, which requires legislative regulation as soon as possible.

The CPT recommends installing video surveillance systems in exercise yards, staff rooms, work areas, corridors and other communal areas (with the exception of cells) in order to ensure the safety and protection of detainees from torture or ill-treatment.

Consequently, prisons should ensure a balance is struck between security requirements and the right of prisoners and detainees to respect their private life. To this end, it is advisable to install video surveillance cameras in all service and work areas, staff duty stations, corridors and other communal areas where there is a risk of unlawful acts or the use of excessive physical force. At the same time, the use of round-the-clock video surveillance in toilets, baths, living quarters and cells must be restricted to guarantee the right to privacy of persons deprived of their liberty.

6.2.7. The State of Healthcare Provision in the HCC SCESU

In 2025, within the framework of the implementation of NPM functions, 13 medical institutions of the HCC SCESU were visited. The results of these visits showed that, despite certain measures taken to improve the quality of medical care provided to convicted and remand prisoners, NPM recommendations remain unimplemented, resulting in the persistence of systemic violations of patients' rights in medical units and hospitals within penitentiary institutions.

During 2025, there was a decrease in the number of hospitalisations from institutions of the SCESU to the in-patient wards of medical units and hospitals of the HCC SCESU, from 9,527 people in 2024 to **6,754** people in 2025, as well as a slight decrease in the number of hospitalisations to publicly or privately owned healthcare facilities (from 1,047 to **921** people respectively). A worrying trend is the significant increase in the number of hospitalisations to psychiatric care facilities due to the exacerbation of symptoms of mental disorders – from 162 cases in 2024 to **315** in 2025, indicating a deterioration in the mental health of persons deprived of their liberty and the inadequacy of preventive and rehabilitative measures.

At the same time, some positive developments have been noted in the activities of the HCC SCESU, in particular the expansion of OST programmes and the start of implementation of the provisions of the Strategy for the Development of the Healthcare System in PEs through the introduction of access to quality medical care via a Unified Healthcare System. The case law of the ECtHR confirms the State's obligation to ensure that persons deprived of their liberty receive timely and adequate medical care, including regular medical supervision, the existence of a treatment plan and a consistent course of therapeutic measures.

6.2.8. Compliance with Standards of Medical Care

One of the key reasons for non-compliance with the principle of equivalence of medical care is the shortage of specialist staff in medical units, which leads to breaches of established standards of treatment for prisoners.

In particular, the participation of a general practitioner (or family doctor), a psychiatrist and a dentist is mandatory during initial and preventive medical examinations of prisoners. The results of the NPM's visits reveal a significant number of vacant posts for these specialists, which makes it impossible to carry out comprehensive medical examinations and detect illnesses in a timely manner.

Another issue is the inadequate conditions for the provision of outpatient medical care. Some medical units lack separate consultation rooms for doctors, meaning that medical care is provided in premises not intended for individual patient consultations. This practice fails to ensure the confidentiality of medical information and breaches the requirements of Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms.

Furthermore, the NPM notes that access to doctors in medical units is difficult, particularly in RCs, where detainees and prisoners are forced to wait for long periods to see a doctor and receive the necessary medical care.

A major obstacle to the work of most medical units within the PEs is the fact that the vast majority of detainees and prisoners have not registered with a primary care doctor. This problem effectively deprives patients of the opportunity to receive medical services through the Medical Guarantees Programme, as having a declaration in the eHealth is a mandatory condition for state funding of treatment. Consequently, the absence of a declaration mechanism constitutes a violation of the right to healthcare.

However, it should be noted that in 2025, the staff of healthcare facilities of the HCC SCESU will include clinical psychologists who will conduct screening assessments among prisoners and detainees, enabling the timely provision of necessary medical and psychological assistance, and preventing the exacerbation of existing chronic conditions, self-harm and suicidal behaviour.

Medical units and hospitals are not supplied with sufficient quantities of medicines and medical devices, forcing patients to rely on assistance from relatives. Even where medicines are available in medical units, NPM teams have recorded reports of patients not actually receiving them. Cases have been identified of the storage and use of medicines and medical devices whose expiry dates have passed.

During a visit to Vinnytsia City Clinical Hospital No. 1, a branch of the HCC SCESU in Vinnytsia region, a prisoner, Mr P., came forward; according to his medical records, he has been diagnosed with “type 2 diabetes”. The patient reported that since 1 February 2025 he had not been receiving medication from the facility due to a shortage, and was therefore forced to obtain it from relatives. The NPM team also found that the medical unit lacked hypoglycaemic medication (the remaining stock had expired).

In order to uphold the right of prisoners and detainees to free access to information, the medical units of the HCC SCESU have introduced the positive practice of systematically displaying information on the availability of medicines, medical devices and consumables on information boards.

An equally important issue is the lack of facilities for the proper storage of medical waste, which may pose an epidemiological threat to patients and staff.

6.2.9. Documentation and Reporting of Bodily Injuries

In some medical units, the identification and recording of cases of bodily injury are not carried out in accordance with established requirements. In particular, the relevant entries in the registration logs lack information regarding notifications to the public prosecutor and law enforcement authorities, and medical staff do not attach Primary Record Form No. 511/o “Certificate on the Recording of Bodily Injuries”, approved by Order of the Ministry of Health of Ukraine (hereinafter – the MoH of Ukraine) No. 110 of 14 February 2012, to the information on physical injuries.

The NPM team has recorded instances where photographic evidence is not attached to certificates of bodily injury, which constitutes a breach of established requirements and undermines both the effectiveness of documenting potential acts of violence and the effectiveness of investigating each case.

During a visit to Medical Unit No. 117 of the branch of the HCC SCESU in the Kharkiv and Luhansk regions, the NPM team found that the register of recorded instances of bodily injury was being maintained in breach of the established

requirements; the relevant entries lacked information regarding notifications to the prosecutor and law enforcement agencies, and medical staff had failed to attach Form No. 511/o of the primary record-keeping documentation to the reports on bodily injuries, as well as photographic evidence of the injuries present. Furthermore, according to the register of recorded bodily injuries for 2024–2025, five cases of bodily injury were recorded, yet the medical unit holds photographic evidence for only two of them.

The absence of properly documented physical injuries is inconsistent with paragraph 60 of the CPT's recommendations (CPT/Inf(93)12-part), according to which medical services in places of detention must systematically record physical injuries and, where necessary, inform the competent authorities.

6.2.10. Medical Care for Persons with Infectious Diseases

Viral hepatitis C (hereinafter – HCV) is a factor in the development of irreversible complications, in particular liver cirrhosis and hepatocellular carcinoma (liver cancer), leading to a permanent loss of quality of life and premature mortality. Findings from visits reveal shortcomings in the provision of treatment for people with viral hepatitis C, indicating a failure to adhere to the principle of equivalence of medical care in the healthcare facilities of the HCC SCESU.

In 2025, there was an increase in the number of people held in facilities of the SCESU on suspicion of viral hepatitis C – from 4,249 in 2024 to 6,577 in 2025, as well as an increase in the number of people with a confirmed diagnosis of viral hepatitis C using the polymerase chain reaction method (from 1,194 to 1,340 people respectively). Despite this, the number of patients receiving antiviral treatment for HCV fell significantly in 2025 – from 1,850 in 2024 to 758, indicating limited access to treatment and the risk of treatment interruption.

The NPM groups found that, upon arrival at the facility, medical staff do not offer individuals screening for HCV. The lack of early detection of the infection prevents the timely initiation of treatment and contributes to the spread of the virus. Individuals with a confirmed diagnosis are not prescribed antiviral therapy, despite the presence of clinical indications set out in the “Criteria for Priority Treatment” and the failure to provide priority treatment in accordance with the Standard of Medical Care “Viral Hepatitis C in Adults”, approved by Order of the MoH of Ukraine dated 23 July 2025.

The conditions in which patients are held in medical units are a particular cause for concern. Inpatient treatment is often provided in wards that do not meet therapeutic standards or hygiene and sanitation requirements. A particularly serious violation is the failure to adhere to infection control principles: patients with infectious diseases such as

tuberculosis are held in ordinary wards on different floors of secure buildings, which significantly increases the risk of the infection spreading epidemically.

6.2.11. Medical Care for Persons with Mental Disorders

Currently, there are shortcomings in the provision of high-quality medical care for persons with mental and behavioural disorders. Medical care for this category of patients is provided in a manner that infringes upon their rights, as set out in Article 25 of the Law of Ukraine “On Psychiatric Care”.

During a visit to the Lutsk City Clinical Hospital of the branch of the HCC SCESU in the Volyn and Rivne regions, the NPM team identified a prisoner who was being held in a solitary confinement cell. During the interview, the prisoner reported frequent mood swings. Furthermore, the prisoner showed signs of impaired thinking and, according to staff at the RC, periodically exhibited aggressive behaviour, which was one of the factors in the decision to place him in solitary confinement. During discussions with medical staff and a review of medical records, it was found that on 28 February 2025, the prisoner was seen by a psychiatrist and diagnosed with “Delusional Disorder” with the recommendation “Observation. Follow-up examination in 2 weeks”.

It should be noted that the EctHR has repeatedly pointed out in its judgments that Article 3 of the Convention for the Protection of Human Rights and Fundamental Freedoms has been violated due to the inadequate provision of medical care to convicted persons and prisoners.

Insufficient staffing of medical units with psychiatrists and clinical psychologists hinders the provision of comprehensive and timely medical care, significantly reduces the effectiveness of suicide prevention measures among convicted and detained persons, and negatively impacts conflict prevention in prisons.

Another systemic and critical violation is the failure to observe the principle of voluntariness in the provision of psychiatric care. During visits and discussions with patients, it was established that, in many cases, prisoners and convicted persons are not given the opportunity to read and sign an informed consent form for a psychiatric examination, nor an informed consent form for receiving outpatient psychiatric care.

This practice contravenes the requirements of the Order of the MoH of Ukraine “On the Approval of Forms of Primary Record-Keeping Documentation and Instructions for their Completion” dated 15 September 2016 No. 970, which stipulates the mandatory requirement for documentary confirmation of a person’s voluntary consent to the relevant

medical interventions.

The absence of properly documented informed consent deprives patients of the opportunity to exercise their right to make an informed choice, creates risks of psychiatric care being provided in a perfunctory or coercive manner, and makes it impossible to effectively monitor the legality of medical staff's actions. Furthermore, such practices increase the vulnerability of persons deprived of their liberty to potential abuse and violate international human rights standards.

This highlights the need to strengthen organisational and oversight mechanisms aimed at ensuring genuine, rather than merely formal, adherence to the principle of voluntariness when providing psychiatric care to persons in custody or serving a sentence.

Access to healthcare for people with mental and behavioural disorders resulting from the use of psychoactive substances remains a pressing issue. Indeed, in 2025, the number of people diagnosed with substance-related disorders rose significantly – from 2,156 in 2024 to 3,552 in 2025, which correlates with an increase in the need for – OST from 1,040 to 1,486 people respectively. A positive trend is the expansion of access to OST, as the number of people actually receiving this service rose from 959 in 2024 to 1,419 in 2025, which is consistent with the measures announced by the HCC SCESU regarding the development of addiction treatment programmes.

Furthermore, in the context of providing mental health care, the HCC SCESU, within its remit, in accordance with the Order of the KMU (Government of Ukraine) No. 920-r of 20 August 2025 “On the Approval of the Drug Policy Strategy for the Period up to 2030 and the Approval of the Operational Plan of Measures for its Implementation in 2025–2027”, ensures unimpeded access for patients to the OST programme in the institutions of the HCC SCESU.

In order to ensure appropriate medical care for individuals with mental and behavioural disorders resulting from the use of psychoactive substances, the HCC SCESU expanded the network of OST in 2025: 7 new centres were opened, bringing the total number of operational OST to 23 as of 1 January 2026. A total of 746 people received treatment. OST programmes cover HCC SCESU institutions at all security levels. For 2026, the HCC SCESU has approved an Order on the plan for the further expansion of OST programmes, which provides for the opening of four new sites in the Dnipropetrovsk and Kharkiv regions, specifically for individuals held in pre-trial detention institutions who have a concomitant tuberculosis infection.

6.2.12. Respect for the Rights of Prisoners of War

Within the framework of the NPM functions in 2025, staff from the Commissioner's Secretariat, together with representatives of civil society organisations, carried out systematic visits to places where prisoners of war are held. In particular, visits

were made throughout the year to all camps for the detention of prisoners of war, as well as to some sections for the detention of prisoners of war within the PE.

During the visits, representatives of the NPM teams were granted unhindered access to places of detention and the opportunity to communicate confidentially with prisoners of war. It was established that all detainees have the status of prisoners of war in accordance with Article 4 of the Geneva Convention relative to the Treatment of Prisoners of War of 12 August 1949 (hereinafter – the Geneva Convention).

The regulatory and legal framework governing the operation of camps and detention sections for prisoners of war in Ukraine is based on the provisions of the Geneva Convention relative to the Treatment of Prisoners of War and the Additional Protocol to the Geneva Conventions relating to the Protection of Victims of International Armed Conflicts (Protocol I).

At the national level, the operation of camps is regulated by the Procedure for the Detention of Prisoners of War, approved by Resolution of the Cabinet of Ministers of Ukraine No. 413 of 15 April 2022, as well as the Procedure for the Implementation of Measures Concerning the Treatment of Prisoners of War during a Special Period, approved by Resolution of the KМУ (Government of Ukraine) No. 721 of 17 June 2022. These regulatory acts implement the basic standards of the Geneva Convention and establish the legal framework for the operation of the camps, ensuring adequate living conditions, safety and medical care for prisoners of war.

At the same time, the existing regulatory framework is fragmented and does not provide for comprehensive regulation of the operation of prisoner-of-war camps. There is a lack of specialised departmental regulations, in particular rules of internal order for the camps, procedures for bringing prisoners of war to disciplinary responsibility, instructions on the regime, security and supervision, procedures for the use of technical means of control, as well as standards for material and living conditions. As a result, camp administrations are forced to rely on regulations designed for penal institutions, which do not take into account the specific legal status of prisoners of war.

During confidential interviews with prisoners of war, there were generally no complaints of ill-treatment. Most of those interviewed noted that the general atmosphere in the camps is stable and acceptable; camp staff maintain a correct, polite and measured attitude and do not apply physical or psychological pressure.

Generally, adequate living and sanitary conditions have been established in the camps; there have been no reports of overcrowding or shortages of clothing, footwear, or bedding. Prisoners of war are provided with access to adequate food, medical care, the ability to correspond, receive parcels, meet religious needs, engage in physical exercise, and enjoy leisure activities.

To meet religious needs, religious buildings are in operation within the camp grounds, or prayer corners are being set up to accommodate religious needs.

The camps ensure an adequate supply of clothing for prisoners, allowing for the timely replacement of worn-out or damaged items and maintaining proper living conditions.

The camp dining halls and kitchens were maintained in proper sanitary and hygienic condition; there were no cases of food poisoning during the camps' operation. During visits, the weekly menu was reviewed, and it was established that meals are provided three times a day according to a schedule. Meals were served on time and met appropriate organoleptic standards.

The camps have organized a systematic program of labour. Prisoners of war work in production facilities and workshops. In addition to production work, prisoners of war perform tasks related to the daily maintenance of the camps. In particular, they work in the mess hall, where they prepare meals, serve food, and keep the kitchen area clean.

At the same time, there are issues regarding the use of prisoners of war for labour in the camps.

During a visit to the “Center-3” camp, representatives of the NPM team noted that the positions of staff members involved in providing support services at the camp are not included in the institution’s official staffing table. Consequently, their salaries are paid from a special fund, which can create certain difficulties, namely: funding instability and the risk of service interruptions if there are delays in funding or a shortfall in funds.

Prisoners of war at the “Zakhid-1” camp, who were assigned to perform domestic service tasks, spoke in private conversations about the excessive length of their workdays. At the same time, working hours are not properly recorded at the camp, making it impossible to monitor compliance with permissible working hours.

Each camp has medical units that provide outpatient and inpatient care, as well as initial, periodic, and preventive medical examinations. Medical units are generally staffed at 75–90% capacity, equipped with basic medical equipment, have adequate facilities for diagnosis and treatment, and are provided with centralized water supply and heating. Renovation work has been completed or is ongoing in some medical units, which has positively impacted the physical condition of the facilities and the living conditions for patients. During confidential interviews, the majority of prisoners of war expressed satisfaction with the medical care provided.

In some facilities, a model for confidential patient care has been implemented by redesigning examination rooms and installing modern fire alarm systems in recently

renovated isolation wards. These measures indicate a gradual adaptation of detention conditions to international standards, despite limited resources during wartime.

6.2.13. Places of Detention under the Jurisdiction of the Ministry of Internal Affairs of Ukraine

The NPU is a key institution in the system of law enforcement and national security. The NPU operates the most extensive network of detention facilities among all law enforcement agencies in the country.

As of December 31, 2025, the NPU system included the following specially equipped places of detention:

- 91 temporary detention facilities, which held over 32,500 people during the year;
- 571 detention facilities within police agencies and units, where 2,419 people were held;

- 406 specialized vehicles for transporting detainees and those in custody;

- 1 reception and distribution centre for children.

In 2025, NPM teams visited **125** places of detention under the jurisdiction of the NPU, of which: 93 were territorial police units, 29 were temporary detention facilities, and 3 were specialized transport vehicles.

6.2.14. Regional Units of the National Police of Ukraine

Under Article 4 of the Convention against Torture, Ukraine is obligated to criminalize all acts of torture and ensure their impartial investigation. However, the findings of monitoring visits indicate a complex situation regarding the activities of the NPU. For many years in a row, NPM teams have documented identical systemic violations regarding the inadequate response to instances of physical force used by police officers. Reports of possible criminal offenses (assaults) committed by police officers are investigated without notifying the SBI or registering the information in the URPTI.

Despite the Commissioner's systematic submission of response reports throughout 2024–2025 and the provision of detailed recommendations in annual and special reports, the leadership of the NPU has not taken effective measures to implement them. Instead of ensuring an independent investigation into the use of physical force, certain police units have for years practiced a subjective, internal assessment of subordinates' actions. This practice of substituting procedural actions with internal administrative reviews directly contradicts the requirements of the Criminal Procedure Code of Ukraine, undermines the principle of objectivity, and indicates a failure to fulfil Ukraine's positive obligations to investigate all instances of alleged torture in accordance with the criteria for effective investigation.

In particular, in 2025, it was again confirmed that the heads of certain local police units deliberately avoid informing the SBI and fail to register relevant information in the URPTI, attempting to conceal crimes through formal internal investigations. Such collusion and disregard for the Commissioner's long-standing observations only encourage impunity.

Evidence of non-compliance with standards for independent investigations into incidents of police use of force was identified during visits to Police Station No. 3 of the Poltava District Police Department of the MDNP in Poltava region, Police Station No. 1 of the Kamianske District Police Department of the MDNP in Dnipropetrovsk region, the Zaporizhzhia District Police Department of the MDNP in Zaporizhzhia region, as well as in other units across various regions of Ukraine.

In accordance with Article 45(6) of the Law of Ukraine "On the National Police," a police officer is required to notify his or her supervisor in writing of the use of special means against a person.

However, the NPU lacks an established procedure for maintaining records (logs, books, etc.) to document instances of the use of special means, physical force, and similar measures.

During visits, in a significant number of cases, despite the existence of evidence and complaints regarding the use of physical force and special means, police officials did not provide the NPM teams with any information or documents (including reports) confirming that the officers who used force or special means had reported this to their superiors.

The lack of oversight regarding the legality and justification of the use of special measures and physical force increases the risk of abuse and violations of detainees' rights. This complicates the conduct of objective inspections and investigations, weakens the accountability of officials, and undermines trust in law enforcement agencies.

6.2.15. Temporary Detention Facilities of the National Police of Ukraine

In its report following a visit to Ukraine (October 16–23, 2023), the CPT emphasized that prolonged stays in temporary detention facilities are unacceptable. By their very nature, temporary detention facilities are not intended for long-term stays (in particular for serving administrative detention), as the existing regime is limited to a minimal list of activities: daily walks, access to literature, and, in some cases, radio or television.

In light of this, the CPT recommended that the Ukrainian authorities consider establishing specialized facilities for holding individuals serving administrative detention, particularly for those detained for more than 72 hours.

Despite the recommendations provided to the NPU in the Commissioner's previous reports, as well as the critical findings of the European Committee for the Prevention of Torture, the problem of the incompatibility of the infrastructure and regime requirements of TDFs with the standards for long-term detention remains unresolved.

The lack of an effective response from the NPU to these challenges indicates a perfunctory approach to fulfilling Ukraine's international obligations, a deliberate delay in the process of humanizing the system, and creates risks of discrediting the state at the international level.

Based on the results of NPM monitoring visits, systemic problems were identified regarding the protection of the right to life of persons detained in TDFs amid the Russian Federation's armed aggression against Ukraine.

The vast majority of the TDFs visited lack shelters for detainees and staff due to the absence of built-in civil defence structures (shelters, bunkers).

According to information provided by the NPU, only the TDFs of the MDNP in Odesa region, TDFs of the MDNP in Rivne and Khmelnytskyi regions, and the TDFs of the MDNP in Kyiv have been designated as basic shelters for the public.

At the TDF, where there is no basic shelter, staff not on duty may use the shelters located at local police stations when an "Air Raid Alert" is sounded. At the same time, detainees remain in their cells, and TDF staff on duty are forced to remain at their workstations without access to protective structures.

The removal of detainees from their cells during an "Air Raid Alert" is not carried out due to an insufficient number of TDF staff required to ensure their safe escort (convoy) to the shelter, the lack of clear protocols for such situations, and the absence of specially equipped areas for detainees within the shelters located at local police stations.

The Instructions on Ensuring the Detention Regime and Security of Persons Held in Temporary Detention Facilities of the National Police of Ukraine, approved by Order of the MIA of Ukraine No. 777 dated September 25, 2023, do not contain clear procedures for staff actions or the order of evacuation of detainees when an "Air Raid Alert" signal is sounded.

The provisions of the Instructions specify in detail the grounds for removing detainees from cells, including: for procedural actions, visits, sanitation, medical care, conveying, evacuation from the TDF, as well as specific cases of nighttime removal.

The term "Evacuation from the TDF," as a basis for removing detainees, corresponds to the concept of evacuation defined in Article 2 of the Civil Protection Code of Ukraine, since the "Air Raid Alert" signal is an official civil protection warning signal indicating an imminent threat of an air or missile strike, i.e., a military emergency that poses a real danger to the life and health of persons held in the TDF.

At the same time, none of the provisions analysed specify procedures for TDF staff in the event of an "Air Raid Alert" signal or other threat requiring the immediate

evacuation of detainees, which confirms that the regulations are limited to routine aspects of the detention regime.

The absence in the Instructions of procedures for carrying out such an evacuation (staff action protocols, criteria for making evacuation decisions, plans for accompanying detainees to shelters, etc.) effectively makes it impossible to remove detainees from their cells during an “Air Raid Alert” signal.

Although the current version of the Instructions permits the use of “evacuation” as a basis for removing detainees from TDF cells during an “Air Raid Alert” signal, this basis is formal and ineffective due to gaps in procedural regulations and creates a situation in which TDF staff are unable to act appropriately.

The National Police of Ukraine has not developed appropriate guidelines or clear protocols for action when an “Air Raid Alert” signal. TDF employees do not receive proper training on how to respond during an air raid alert and are unable to move to a shelter, which also violates their right to safe and healthy working conditions, guaranteed by Article 43 of the Constitution of Ukraine and Article 4 of the Law of Ukraine “On Labor Protection.”

The case law of the ECtHR in the cases of “Osman v. the United Kingdom” (1998) and “Kudła v. Poland” (2000) confirms the State’s positive obligation to ensure the prevention of real threats to life and inhuman treatment of persons under its control, especially in high-risk situations.

The European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment (hereinafter – CPT), in its report on the results of its visit to Ukraine from October 16 to 27, 2023 (CPT/Inf (2024) 20), emphasizes the need to ensure the safety of detainees in places of detention, in particular by equipping protective structures and developing evacuation procedures in the event of military threats.

In light of the identified violations and the European Committee’s recommendations, the Commissioner sent a submission (No. 21055.2/25/39.1 dated 12.12.2025) to the MIA of Ukraine to address systemic shortcomings in the regulatory framework and practical operations of TDFs, as well as to prevent the severe consequences of military threats.

6.2.16. Places of Detention in the SMS of Ukraine

The list of places of detention within the SMS of Ukraine includes facilities specifically equipped for holding individuals, vehicles used to transport detainees and persons in custody, as well as offices used by the SMS when processing procedural documents regarding detainees. During 2025, representatives of the NPM conducted five visits to such facilities.

An analysis of the observance of the rights of persons held in TDFs the existence of systemic restrictions on the right to communicate with the outside world. Such restrictions contradict international standards and the principle of legal certainty.

In accordance with Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms and Article 1 of the First Protocol thereto, everyone is guaranteed the right to respect for private and family life, correspondence, as well as the right to peaceful enjoyment of one's property.

The European Committee for the Prevention of Torture (CPT) clearly states in its 19th General Report (CPT/Inf (2009) 27) that persons deprived of their liberty under immigration law must be able to maintain regular and consistent contact with the outside world, in particular through frequent telephone use.

Although the Instructions on the Procedure for the Holding of Foreigners and Persons Illegally Staying in Ukraine, approved by Order of the MIA of Ukraine No. 141 dated 29.02.2016, provide for the possibility of issuing detainees their own mobile phones, in practice, at the Mykolaiv PTPI, this provision is applied improperly due to the absence of a clear, transparent, and legally regulated procedure for such use.

Based on the results of NPM monitoring visits, it was established that the administration of the Mykolaiv PTPI imposes strict, unjustified restrictions, specifically limiting access to communication devices to only twice a week for a few hours. Such restrictions are not provided for by any regulatory act and indicate an impermissible expansion of the discretionary powers of the facility's management.

At the same time, the monitoring revealed positive practices at the Chernihiv and Volyn PTPIs, where foreigners and stateless persons are allowed to use their own mobile phones (with internet access, provided the device has this feature) throughout the day without artificial time restrictions. This confirms the real possibility of exercising the right to communicate with the outside world without compromising security protocols or internal order.

During monitoring visits, NPM teams noted inadequate legal regulation of the procedure for placing foreigners and stateless persons who commit or have committed unlawful acts in isolated rooms at the PTPIs.

In particular, the Mykolaiv PTPI has established a practice of placing individuals in isolation rooms on grounds not provided for by regulatory legal acts.

The vast majority of individuals held in isolation rooms were placed there under the justification of "violating the PTPI's internal rules."

Such wording does not correspond to the exhaustive list of grounds specified in the Instructions on the Procedure for the Holding of Foreigners and Persons Illegally Staying in Ukraine, approved by Order of the MIA of Ukraine No. 141 dated 29.02.2016, and indicates its systematic and improper application.

With the aim of changing the practice of placing foreigners and stateless persons who commit or have committed unlawful acts in isolated rooms, the SMS of Ukraine has provided recommendations for making appropriate amendments to the Instructions, aimed at expanding the list of grounds for placing such persons in isolated rooms, in particular in connection with violations of the internal rules of the PTPI.

6.2.17. Places of Detention of the State Border Guard Service of Ukraine

Based on the results of visits to the temporary holding points (PTT) of the State Border Guard Service of Ukraine conducted in 2025 as part of the NPM, it can be concluded that the operations of PTT involve both positive practices and systemic issues that pose risks of human rights violations.

The NPM teams observed generally adequate material and living conditions in the detention cells in PTT. The cells are equipped with beds, dining furniture, and bathrooms; access to drinking water, adequate lighting, and the ability to summon staff are provided. The living space per person is at least 4 m², which complies with international standards for the treatment of persons deprived of liberty.

A positive practice is the respect for the right to privacy during medical examinations—they are conducted without the presence of security personnel. An important achievement is the availability of separate cells for people with limited mobility, equipped to meet their needs, as well as the provision of an autonomous power supply using diesel generators, which is particularly relevant under martial law and the risk of emergency power outages.

Special mention should be made of PTT in Mostyska, where significant progress has been made in implementing the recommendations issued following the previous visit in 2020. In particular, most shortcomings regarding detention conditions, food provision, access to communication, and medical care have been addressed, demonstrating the SBGS's potential for systemic improvements with proper oversight and management decisions.

At the same time, NPM teams identified recurring violations of procedural guarantees, particularly regarding the rights of foreigners. At the PTT, problems were noted regarding the right to access the services of an interpreter. An interpreter was engaged without documentary confirmation of their competence, or was not engaged at all during the detention phase and the preparation of administrative documents. Such practices create a risk of merely formal notification of detained persons and a violation of Article 5 of the Convention for the Protection of Human Rights and Fundamental Freedoms.

A systemic problem is the failure to properly inform detainees of their rights in a language they understand. Providing information sheets exclusively in Ukrainian to

individuals who do not speak the language effectively nullifies the substance of the relevant guarantees and contradicts the requirements of the SBGS's departmental instructions.

Violations of the obligation to notify close relatives of the fact of administrative detention were also identified. The absence of relevant entries in the protocols indicates not isolated technical shortcomings, but rather a consistent practice of ignoring an important procedural guarantee directly linked to protection against arbitrary deprivation of liberty.

There are shortcomings that do not require significant resources but are of substantial importance for the daily lives of detainees. In particular, the PTT lacks sports equipment in the exercise yards, which effectively deprives individuals of the opportunity to exercise their right to physical activity. Additionally, there are no rooms for religious services, or they are not equipped with religious literature, which restricts freedom of belief and religion.

In general, the PTTs of the SBGS that were visited demonstrate an acceptable standard of material conditions and the capacity to gradually address previously identified shortcomings. At the same time, key risks to human rights are concentrated in the areas of procedural safeguards, the treatment of foreigners, and a formalistic approach to the implementation of certain requirements of national and international law. Addressing these issues requires not so much financial expenditure as systematic work with staff, updating internal guidelines, and strengthening departmental oversight.

6.2.18. Places of Detention under the Jurisdiction of the Ministry of Defence of Ukraine

Places of detention under the jurisdiction of the Ministry of Defence of Ukraine, including disciplinary battalions, guardhouses, and detention cells of the Military Law Enforcement Service of the Armed Forces of Ukraine, are specialized facilities where military personnel subject to disciplinary sanctions, administrative detention, or preventive measures are held. Conditions of detention in such facilities must comply with the requirements of the Constitution of Ukraine, the European Convention on Human Rights, the UN Convention against Torture, as well as national legislation and departmental regulations.

Based on the results of visits by NPM teams, it was established that, overall, the activities of the examined units of the Armed Forces of Ukraine are aimed at ensuring proper detention conditions and respect for the fundamental rights of persons deprived of their liberty.

In most of the facilities visited, representatives of the NPM teams noted that living conditions were satisfactory or adequate. Cells are generally equipped with natural and

artificial lighting, heating and ventilation systems, and separate sleeping areas. In a number of cases, the presence of equipped sanitary facilities or access to them in accordance with established procedures was noted, as well as the ability to maintain proper sanitary conditions in the premises.

NPM team representatives noted as a positive practice the provision to persons held in guardhouses of the rights stipulated by regulatory and legal acts to a daily walk, to receive food in accordance with approved standards, and to access medical care when necessary.

No instances of ill-treatment, torture, or degrading treatment were observed during the visits, and no complaints of this nature were received from detainees by representatives of the NPM teams.

It is worth noting the existence of logs recording detained individuals, the times of their arrival and release, as well as the provision of training to staff on human rights compliance. In some units, conditions have been established to allow for confidential communication with lawyers and the ability to maintain contact with relatives within the limits prescribed by law.

There are a number of systemic shortcomings. In particular, in some facilities, cells have limited space, which does not always meet recommended international standards for minimum living space per person. In some cases, there are no separate exercise yards, or their design is merely formal, which limits the actual opportunity to spend time outdoors.

The issue of medical care remains problematic. As a rule, there are no full-time medical staff directly at the detention facilities, and medical care is provided through military or civilian healthcare institutions, which can lead to delays in medical examinations, particularly when detainees are placed in cells.

The shortcomings identified during visits indicate the need for further improvement of the material and technical infrastructure, medical care, and bringing detention conditions into full compliance with international standards in the field of preventing torture and ill-treatment.

6.2.19. The Observance of Human Rights during the Arrest and Detention of Individuals by Law Enforcement Authorities with Special Status

For the first time since the Commissioner was assigned the functions of the NPM, systematic visits have begun to law enforcement authorities with special status, specifically the SBI and the NABU.

The necessity of these monitoring visits stems from the need to ensure external independent oversight of human rights compliance in institutions that possess broad powers to restrict an individual's personal liberty. Extending the NPM's mandate to these agencies is a key step toward preventing torture and ill-treatment and ensuring the

transparency of the entire law enforcement system in accordance with European standards.

6.2.20. Subdivisions of the National Anti-Corruption Bureau of Ukraine

During the visit to NABU, no complaints were received from detainees regarding torture, cruel, or other inhuman or degrading treatment.

Among the positive practices noted were the functioning of the Bureau's Internal Control Department and the availability of six specially equipped rooms for conducting procedural actions, equipped with modern video recording systems.

At the same time, a number of systemic shortcomings were identified in the organization of work with detainees, which required immediate rectification. The most significant of these concerned: the absence of specifically designated officials responsible for ensuring the rights of detainees; inadequate documentation of all actions regarding detainees; the lack of fully equipped specialized facilities for the temporary detention of detainees; insufficient regulation and record-keeping regarding the use of physical force and special equipment; failure to promptly inform centres providing free secondary legal aid about detentions; the absence of a separate room for confidential meetings between detainees and their defence attorneys; the use of unmarked special equipment (protective helmets, body armour, shields, etc.), which made it impossible to identify officers in cases of force use; and other violations.

Based on the results of the visit, the Commissioner issued recommendations aimed at addressing the identified shortcomings and bringing the NABU's activities into compliance with the Constitution of Ukraine, the Criminal Procedure Code of Ukraine, national legislation, and international standards, including the recommendations of the European Committee for the Prevention of Torture.

The NABU demonstrated a constructive approach to implementing the recommendations and took a series of systemic measures to address most of the identified issues. In particular, the drafting of internal regulations defining the powers, rights, and duties of officials responsible for the custody of detainees and monitoring the observance of their rights has been completed. Body armour and protective helmets for employees of the Special Operations Directorate have been marked with individual numbers, enabling the identification of individuals in the event of the use of physical force.

The heads of all NABU departments have informed their staff of clear requirements regarding the prohibition of keeping detainees in office spaces for extended periods without urgent necessity, the immediate transfer of detainees to pretrial detention facilities upon completion of procedural actions, the timely preparation of detention protocols with precise recording of the actual duration of the restriction of liberty, as well as the strict and prompt notification of free secondary legal aid centres. Ongoing

educational and methodological work is being conducted with staff to prevent violations of detainees' rights.

Work is ongoing to equip a special room for confidential meetings between detainees and their defence attorneys in accordance with national and international standards. Additionally, based on clarifications received from the MoH of Ukraine regarding physiological nutritional standards, calculations are being made for additional funding to ensure detainees receive high-quality food and unimpeded access to drinking water.

The measures taken demonstrate NABU's readiness to address identified violations and consistently improve its operations in accordance with European human rights standards.

6.2.21. Subdivisions of the State Bureau of Investigations

In April 2025, NPM teams conducted their first visit to the State Bureau of Investigations.

During the visit, a number of positive practices were noted, namely: the equipping of interrogation rooms with video surveillance cameras, constant access to drinking water and adequate conditions of detention, the availability of rooms for confidential meetings with defence attorneys, systematic internal training on preventing torture and other forms of ill-treatment, the appointment of officials responsible for ensuring detainees' rights, the creation of an electronic system for monitoring complaints of torture, as well as the implementation of psychological support for staff working on cases involving the death of victims, torture, and other forms of ill-treatment.

At the same time, a number of systemic problems requiring immediate attention have been identified. In particular, it was found that there is a lack of proper record-keeping regarding the use of physical force and special restraints, including cases where plastic ties are used as a means of restraint without defined rules for their application.

Representatives of the NPM teams drew particular attention to the circulation of photographs that may have shown signs of degrading treatment of detainees. This refers to cases where a person is lying on the cold ground without any apparent necessity, surrounded by armed law enforcement officers, in the absence of any immediate threat that could justify such restraint (the person is not resisting, is not showing aggression, and is not attempting to escape).

In addition, cases were documented of responsible officials failing to comply with Article 212 of the Criminal Procedure Code of Ukraine regarding the documentation of the circumstances of detention, as well as the prolonged detention of individuals in SBI premises without access to adequate conditions, food, and drinking water.

Cases were also identified where investigative actions were conducted outside of equipped rooms without video recording, as well as isolated violations of the right to timely access to a lawyer.

Based on the findings of the visit, the Commissioner provided comprehensive recommendations on addressing violations and bringing the SBI's activities into compliance with national legislation and CPT standards. In response, the SBI demonstrated a systematic and responsible approach by developing and approving the Guidelines on Ensuring the Rights of Detained Persons, which had been previously agreed upon with the Commissioner.

To implement these changes in practice, extensive training was organized for staff at the central office and regional offices, and relevant training materials were distributed. A key step was the creation and equipping of additional interrogation rooms with mandatory audio and video recording systems. All personnel received clear instructions to conduct any procedural actions exclusively in such rooms, which minimizes the risks of ill-treatment and ensures the transparency of the process.

An important aspect in preventing torture and other forms of ill-treatment was the integration of an electronic system for monitoring complaints of torture into the SBI's general document management system. Oversight has been strengthened to ensure that centres for free legal aid are notified in a timely manner of detentions. The leadership of pre-trial investigation agencies has received instructions regarding the inadmissibility of detainees' prolonged stay in bureau premises and the mandatory requirement for their immediate transfer to the NPU's TDFs.

The set of measures taken demonstrates the SBI's readiness to systematically transform its operations to ensure respect for human rights and compliance with European human rights standards. Currently, efforts in this area are ongoing and systematic, and are under the Commissioner's constant supervision.

6.2.22. Ensuring the Rights of Persons Detained in Places of Detention during Judicial Proceedings

As of December 31, 2025, there were 758 appellate and local courts operating in Ukraine that administered justice. Of these, 388 courts were equipped with facilities for holding defendants and convicted persons.

Throughout 2025, NPM teams conducted 141 visits to courts, which revealed systemic issues regarding human rights compliance and security in places of detention within the judicial system.

A separate issue is the failure to comply with requirements regarding the organization of isolated escort routes. In violation of the requirements of point 13 of the Instruction on the Organisation of Escort and Detention in Courts of Accused

(Defendants) at the Request of Courts, approved by a joint order of the Ministry of Internal Affairs of Ukraine, the Ministry of Justice of Ukraine, the Supreme Court of Ukraine, the High Specialized Court of Ukraine for Civil and Criminal Cases, the State Judicial Administration of Ukraine, and the Prosecutor General's Office of Ukraine dated 26.05.2015, No. 613/785/5/30/29/67/68 (hereinafter—the Instructions on the Organization of Escort), in a number of courts, defendants and accused persons are transported from their cells to courtrooms through corridors accessible to visitors and other individuals, which creates risks of uncontrolled contact, including between persons prohibited from communicating with one another.

In particular, during a visit to the Haivoron District Court in Kirovohrad region in July 2025, the absence of a secure transport route was noted. Similar violations were noted by NPM teams at the Mykolaiv District Court in the city of Mykolaiv, the Shevchenkivskyi District Court in the city of Kyiv, the Kyiv District Court in the city of Poltava, and other courts.

In some judicial institutions, there continues to be a failure to comply with regulatory requirements regarding the sufficient number of holding cells for defendants (convicts), which must be determined based on a ratio of at least three cells for each courtroom in criminal proceedings, in accordance with point 6.5.2 of SBS V.2.2-26:2010 “Buildings and Structures. Courts,” approved by Order No. 175 of the Ministry of Regional Development and Construction of Ukraine dated 17.05.2010, and point 9 of the Instructions on the Organization of Escort.

In a number of courts, such holding cells are either absent entirely or insufficient in number, making it impossible to comply with the principles of separate detention of men and women, adults and minors, as well as the isolation of individuals with whom contact is prohibited.

As a result, defendants (convicts) are forced to wait for long periods of time for court hearings in stationary, partitioned booths in courtrooms or directly in special vehicles, which is unacceptable given the conditions of detention and the duration of their stay in unsuitable premises.

Such incidents were documented by NPM teams, in particular, at the Hoshcha District Court in Rivne region, the Chernihiv District Court in Chernihiv region, and others.

Particular concern is raised by the detention of defendants and prisoners in cells with an area of less than 4 m², which violates the requirements of Section 6.5.2 of SBS

V.2.2-26:2010 and point 10 of the Instructions on the Organization of Escort. The confined space negatively affects the physical and psychological well-being of persons in custody and does not comply with national and international standards for the treatment of persons deprived of their liberty.

Such violations were found, in particular, at the Rivne City Court in Rivne region (cell area: 0.6 m²), the Bahachevsk City Court in Cherkasy region (cell areas: 2.272 m² and 2.188 m²), and others.

In addition, because some courts lack separate restrooms for defendants (convicts) the provision of which is required by point 6.5.1 of SBS V.2.2-26:2010 and point 9 of the Instructions on the Organization of Escort—the latter are forced to use restrooms intended for court visitors. This not only violates security requirements but also significantly increases the risk of prohibited items being smuggled in.

Such cases have been established, in particular, in the Krasyliv District Court of Khmelnytskyi region, the Chutivskyy District Court of Poltava region, and other courts.

Based on the findings of systemic violations identified in the Annual Report of the Commissioner for 2024, the SJA of Ukraine has issued recommendations to conduct an audit of court premises located in residential buildings, and to take urgent measures to ensure the isolation and autonomous operation of judicial institutions, in particular by relocating them to separate buildings or administrative complexes that meet national standards. It is also recommended to develop a comprehensive program for adequate access to justice, which should provide for the equipping of all courts with cells for defendants (accused persons) and convicts with an area of at least 4 m², at a rate of three cells for each courtroom used for criminal proceedings, and the conveying of defendants and convicted persons to courtrooms via isolated routes.

Based on the recommendations provided, the SJA of Ukraine reported on the response measures taken and planned.

In particular, the SJA of Ukraine reported on the conduct of an audit of court premises located in residential buildings. Based on the results of this audit, a process has been initiated to implement measures aimed at ensuring the isolation and autonomous operation of judicial institutions, including through the phased relocation of courts to separate buildings or administrative complexes that will meet the requirements of national standards.

In addition, the SJA of Ukraine reported on the implementation of the recommendation to develop a comprehensive program, the implementation of which involves gradually bringing the operating conditions of the courts into compliance with established requirements and standards. These measures are currently being implemented and require further monitoring to ensure their effective implementation.

6.2.23. Places of Detention under the Jurisdiction of the Ministry of Health of Ukraine

a) Observance of Human Rights in Psychiatric Care Facilities

In 2025, the Commissioner continued systematic efforts to ensure observance for human rights in places of detention. As part of the NPM's functions, NPM teams visited 11 healthcare facilities providing inpatient psychiatric care, as well as 3 specialized facilities authorized to provide inpatient psychiatric care, including in the context of enforcing court orders regarding the application of compulsory psychiatric treatment.

The visits revealed shortcomings in the operations of psychiatric hospitals that result in violations of the rights of patients undergoing treatment.

b) Provision of Inpatient Psychiatric Care

One of the most significant human rights violations in the provision of inpatient psychiatric care is the practice of performing medical interventions without obtaining the patient's voluntary, informed, and properly documented consent. This practice violates the requirements of Articles 6, 7, and 11 of the Law of Ukraine "On Psychiatric Care," which guarantee a person's right to respect for dignity, participation in decision-making regarding treatment, and access to complete and understandable information about their health condition, treatment methods, potential risks, and alternatives.

The absence of voluntary informed consent creates conditions for a formalistic approach to treatment, abuse by staff, and the application of medical measures without a proper legal basis, which, in turn, undermines patients' trust in the mental health care system and nullifies the mechanisms for protecting their rights.

During a visit to the Kharkiv Regional Council's Municipal Non-Profit Enterprise "Regional Clinical Psychiatric Hospital No. 3," patients reported in confidential conversations with NPM representatives that they lacked information about the medications prescribed to them and those they were taking. At the same time, the medical records lack any doctor's notes stating that providing such information could harm the patient's health. Additionally, Form No. 003/o (inpatient medical record) lacks the patient's signature, which is required to confirm their informed consent to treatment, casting doubt on the voluntary nature of the patient's receipt of medical care at the facility.

Healthcare workers do not properly document instances of physical restraint when it is used.

The absence of relevant entries in medical records and logs makes it impossible to properly monitor the legality and justification of restrictive measures, creates risks of violating patients' rights, and contradicts legal requirements regarding transparency and accountability in the use of restraints at the facility.

The NPM team documented a case where a patient who expressed an intention to leave the ward was restrained in an observation room using makeshift restraints in the presence of other patients.

This practice does not comply with the requirements of point 11 of the Rules for the Use of Physical Restraints and/or Isolation in the Provision of Psychiatric Care to Persons Suffering from Mental Disorders, which explicitly prohibits the use of physical restraints on a person in the presence of other persons suffering from mental disorders, as this violates the principles of respect for dignity and confidentiality during the provision of psychiatric care.

During a visit to the Kharkiv Regional Council's Municipal Non-Profit Enterprise "Regional Clinical Psychiatric Hospital No. 3" and a review of the Register on the Use of Physical Restraints and/or Isolation in the Provision of Psychiatric Care to Persons Suffering from Mental Disorders, and patient medical records, it was found that medical staff do not document instances of patient isolation when such measures are implemented. At the same facility, patients in Ward No. 11 reported that they had not been outside the ward at any time during their stay at the facility.

During visits to psychiatric facilities, NPM teams have documented instances where chemical restraint is used on patients, which involves the administration of

medications with sedative or psychotropic effects to control behaviour or reduce agitation. Ukrainian legislation does not define this concept and does not establish clear grounds, procedures, duration, or mechanisms for monitoring the use of such measures. The Law of Ukraine “On Psychiatric Care” does not regulate the use of medications as restrictive measures, creating legal uncertainty and risks of their arbitrary use. In the absence of proper legal regulation, chemical restraint may be used outside of medical indications as a covert form of coercion, which contradicts Article 28 of the Constitution of Ukraine, the provisions of the UN Convention against Torture, and the practice of the European Committee for the Prevention of Torture (CPT), and the Convention for the Protection of Human Rights and Fundamental Freedoms, which require that any use of medications with a restrictive effect be carried out exclusively for therapeutic purposes, based on clear clinical indications, in the minimum necessary dose, and with proper documentation and monitoring. The absence of clear national rules does not provide adequate safeguards to protect patients from abuse and may result in a violation of Article 28 of the Constitution of Ukraine.

Consequently, the lack of legislative regulation regarding the use of chemical restraint in psychiatric institutions in Ukraine constitutes a significant gap in the system of safeguards for the rights of persons with mental disorders and requires immediate regulatory action that takes into account international standards, clear procedures, oversight mechanisms, and accountability for violations.

During a visit to the Poltava Regional Council’s “Regional Psychiatric Care Facility,” particular concern was raised by patients’ reports of threats from staff (isolation or forced administration of the drug “Haloperidol”) in cases of refusal to perform certain tasks, which may indicate the possible use of psychiatric interventions for non-therapeutic purposes.

A systemic problem that directly affects the protection of patients’ rights remains the shortage of medical and nursing staff in psychiatric hospitals.

Numerous violations of established standards for the storage and quality control of medications used to treat patients have been identified. On occasion, medications past their expiration date were found in the wards of the institutions under investigation.

c) Inappropriate Treatment of Patients in Inpatient Settings

Findings from NPM visits indicate that the practice of inappropriate treatment of patients persists in certain inpatient wards. In particular, there are documented instances

of disrespectful behaviour by facility staff, including verbal abuse, threats, and systematic disregard for patients' basic needs.

Living conditions remain a significant factor contributing to inappropriate treatment. A critical problem is the excessive overcrowding of patients in wards, which makes it impossible to respect the right to privacy. Furthermore, violations of sanitary and hygiene standards, inadequate nutrition, and limited access to drinking water directly impact the effectiveness of treatment and undermine human dignity.

Furthermore, a number of facilities lack a safe and patient-adapted environment, particularly for individuals with limited mobility, indicating systemic shortcomings in the organization of care. Such conditions do not meet the requirements of Article 28 of the Constitution of Ukraine and international standards regarding the prevention of torture and inhuman or degrading treatment.

6.2.24. Places of Detention under the Jurisdiction of the Ministry of Social Policy, Family, and Unity of Ukraine

In 2025, as part of the NPM's mandate, **243** social welfare institutions were visited, 185 of which fall under the jurisdiction of the Ministry of Social Policy of Ukraine.

Based on the results of follow-up visits by NPM teams to a number of institutions, a significant improvement in the observance of residents' rights was noted, indicating an appropriate managerial response and a responsible stance on the part of the administrations. In some institutions, management addressed the identified violations as quickly as possible within a few days of the visit effectively restoring the residents' violated rights.

At the same time, despite these positive examples of prompt response, the results of NPM visits indicate that a significant number of systemic problems persist in the operations of residential care facilities.

6.2.25. The Right of Persons with Disabilities to Social Rehabilitation and Integration

In Ukraine, the process of reforming the system of residential institutions is continuing in accordance with the Strategy for Reforming Psychoneurological and Other Residential Institutions and Deinstitutionalisation of Care for Persons with Disabilities and Older Persons until 2034. The Strategy aims to establish a modern, person-centred, inclusive, and effective support system for persons with disabilities and older adults.

The transition to a new system of social service delivery requires adequate preparation not only of the local communities into which individuals currently residing in institutional facilities will be integrated, but also of social service providers.

However, during visits by NPM teams, systemic violations in the operations of residential care facilities were identified that hinder the deinstitutionalization process, particularly the lack of social rehabilitation for residents and their integration into society.

In most of the residential institutions visited, no work is being done with residents to restore self-care skills, particularly morning hygiene routines and basic food preparation skills. In addition, staff do not teach residents the social skills necessary for life outside residential institutions, such as using public transportation, shopping in stores, and so on.

During confidential interviews with members of the NPM team, residents of Psychoneurological Ward No. 1 at the “Rivne Psychoneurological Boarding School” of the Rivne Regional Council (Boyanivka village) expressed a desire to be able to make their own tea and coffee and to have free access to at least a kettle.

While occupational therapy for residents is intended to help them regain vocational and daily living skills and encourage social engagement, in practice it is limited primarily to cleaning the grounds and living quarters, which is insufficient for effective reintegration into a full life.

A resident of the Municipal Institution of the Lviv Regional Council “Sozanskyi Psychiatric and Neurological Boarding School” informed the NPM team during an interview that, prior to being placed in the institution, he had been engaged in repair work and would like to continue this activity; however, he has no opportunity to realize his abilities within the institution.

In accordance with Article 30 of the Convention on the Rights of Persons with Disabilities, persons with disabilities must be given the opportunity to develop and utilize their creative, artistic, and intellectual potential; to participate on an equal basis with others in leisure and recreational activities, sports events, and visits to theatres, museums, cinemas, libraries, and others.

In many PNIs, even the simplest cultural and recreational activities are not held: there are no clubs, classes in the arts, music, crafts, or sports. Libraries, if they function at all, lack both contemporary literature and specially adapted materials.

Residents of such institutions do not participate in social events and, moreover, have no opportunity to interact with people outside the institution.

In most PNI, cultural activities and daytime activities for residents are limited to watching television programs according to an approved daily schedule and at the discretion of the staff.

During a visit to the “Ladyzhyn Psychoneurological Boarding School,” the NPM team found that the position of cultural and recreational activities coordinator was not included in the staffing plan for 2025.

Furthermore, no opportunities have been created for the residents to participate in field trips or visit theatres, museums, movie theatres, and libraries, nor to gain access to sites of national cultural significance. The lack of opportunities to develop and realize their creative, artistic, and intellectual potential slows down the process of social integration for the wards and limits their participation in community life.

During a visit to the Lviv Regional Council’s “Monastyrotsky Psychoneurological Boarding School,” a resident—who is an artist and aspires to develop his talent—told the NPM team that he dreams of visiting the Lviv National Opera.

During visits to social welfare facilities by NPM teams, evidence was found of a formalistic approach to the provision of social services to clients, specifically: facilities do not assess the individual needs of clients, nor do they develop individualized plans for the provision of social services. As a result, no one is designated to be responsible for the quality of social service delivery, and there is no monitoring of the outcomes of the activities that constitute the content of the social service.

The lack of comprehensive and individualized work with clients prevents the effective restoration of their social, daily living, and vocational skills, hinders the promotion of social activity and integration into society, and makes it impossible to assess the effectiveness of the social services provided.

During a visit to the “Sozansky Psychoneurological Boarding School,” it was found that the facility does not review the assessment of the individual needs of social service recipients. In addition, individual social service plans have remained unchanged for 8 years.

6.2.26. The Right to Liberty and Personal Security

Despite the fact that the Commissioner has repeatedly emphasized that the right to liberty and security of person is one of the fundamental human rights, many social care

institutions continue to restrict residents' access to their own living quarters or their movement within the institution's grounds and premises.

In PNIs, unjustified restrictions on the freedom of movement of certain groups of residents within the facility's grounds are frequently imposed. In particular, individuals under enhanced supervision are forced to remain all day in the so-called "day room", a room with benches and a television – and are allowed to leave it only to eat. This internal rule has no legal basis and is imposed by the facility's administration solely for security reasons, specifically to prevent escapes. At the same time, this practice constitutes an unlawful restriction of freedom and reflects an attitude toward residents that undermines their dignity.

During a visit to the Voronovytsia branch of the Municipal Institution "Regional Residential Care Facility for Persons with Disabilities and the Elderly" in the village of Plyskiv, it was found that the facility imposes restrictions on residents' freedom of movement within the premises and access to their own rooms. The NPM team noted that residents under enhanced supervision are prohibited from leaving the day care area. This internal rule has no legal basis and was established for the convenience of the facility's staff, as one branch employee supervises approximately thirteen residents.

In addition, in geriatric facilities and PNIs, residents are often completely prohibited from leaving the premises, even for everyday or socially important reasons, such as going to the store or church. This practice leads to the isolation of individuals from society and the loss of social connections.

During a visit to the Kozeletsky Geriatric Nursing Home, it was found that the facility has implemented a multi-step procedure for obtaining a pass allowing residents to leave the premises. This procedure effectively restricts residents' freedom of movement, as they are required to first consult a medical professional to have the pass signed and then obtain separate permission from the facility director. Such a procedure bears the hallmarks of unjustified administrative control, constitutes an unlawful interference with the personal freedom of residents, and creates a risk of systematic violations of their rights.

In some facilities, residents are not even allowed to choose where to go for walks, spend time alone, or rest. All movements are monitored by staff, creating conditions of complete dependence on facility employees.

There are also reports of residents being prohibited from staying in their living quarters during the day. They are not allowed to rest in bed during the day or simply be alone. Facility staff justify this prohibition by citing the need to maintain cleanliness and order in the premises. At the same time, it should be noted that many residents take psychotropic drugs or other medications that can cause side effects—drowsiness, fatigue, headaches, and impaired concentration. The inability to rest properly under such conditions can lead to a deterioration in overall health and an exacerbation of existing medical conditions.

During a visit to the Lviv Regional Council's Municipal Facility, the "Khodorivsk Psychoneurological Boarding School," it was found that residents' freedom of movement and their access to their living quarters during the day were restricted. Residents are forced to remain exclusively in the day-care area, in the so-called "gallery," where they spend all their free time without adequate conditions for rest. The doors to these rooms are equipped with locks, indicating a possible practice of locking residents in. According to the residents, they are also locked in their living quarters, a fact confirmed by the discovery of containers for relieving themselves within the rooms. In addition, the residential building is constantly locked, and the residents are unable to move freely within the facility's grounds. Such practices constitute cruel and degrading treatment.

6.2.27. The Right to Own, Use, and Dispose of Property

Throughout the year, NPM teams identified cases of violations of the right of legally competent wards to own, use, and dispose of their property, as guaranteed by Article 41 of the Constitution of Ukraine.

Pension funds and other social benefits are the private property of a legally competent person and, in accordance with the Instructions on the Payment and Delivery of Pensions and Social Benefits by the National Postal Operator, approved by Joint Order No. 464/156, are subject to payment directly to the ward, who personally signs a receipt for the funds.

At the same time, a practice is spreading in care institutions whereby pension funds and other social benefits of legally competent residents are received not by them personally, but by the institution's administration, which subsequently independently determines the timing and amount of disbursement to the wards.

This practice effectively deprives legally competent residents of the ability to freely own, use, and dispose of their property, and also indicates an abuse of authority by staff members of residential care facilities.

During confidential interviews with residents of Psychoneurological Ward No. 1 at the Rivne Regional Council's Municipal Facility "Rivne Psychoneurological Boarding School" (Boyanivka village), it was established that, contrary to legal requirements, residents who are legally competent are not receiving their pensions. Instead, the pension funds of legally competent residents are received by the institution's administration, which, in turn, distributes the residents' pension funds at its own discretion: some individuals receive their pensions partially in the form of cash payments (specifically, 50–100 UAH per day), while others receive them in kind (food).

6.2.28. Implementation of the Rights of Persons Declared Legally Incapacitated or with Limited Legal Capacity

During group visits by the NPM, violations of the rights of persons declared legally incapacitated wards are documented, including instances where guardians fail to properly fulfil their guardianship duties.

At the same time, guardianship and custody authorities, which, in accordance with the Rules of Guardianship and Custody approved by the Joint Order of the State Committee of Ukraine for Family and Youth Affairs, the Ministry of Education of Ukraine, the Ministry of Health of Ukraine, and the Ministry of Labor and Social Policy of Ukraine dated 26.05.1999, No. 34/166/131/88, supervise the activities of guardians and custodians, do not ensure proper and effective oversight of guardians' performance of their duties.

It has been established that guardianship and custody authorities sometimes fail to conduct any inspections of compliance with the rights and interests of incapacitated wards for more than 10 years, disregarding the activities of the guardians and custodians of these individuals. The actual use of wards' pensions, social assistance, and other current income or earnings belonging to incapacitated individuals and held by guardians has long remained outside state oversight.

During a visit to the "Svyatoshyn Psychoneurological Boarding School," it was found that scheduled visits to wards who lack legal capacity—the frequency of which is determined by a separate schedule but must occur at least once a year, with the exception of the initial visit, which takes place three months after guardianship and custody are established—have not been conducted since 2020.

Furthermore, even in cases of systematic and prolonged violations of the rights and interests of legally incapacitated wards by officials of residential care facilities and

guardianship and custody authorities, no measures are taken to relieve guardians (custodians) of their duties or to terminate guardianship (custody).

During the review of the personal files of residents at the Lviv Regional Council's Municipal Facility "Sudovyshnyansky Psychoneurological Boarding School," it was determined that there are 9 residents whose guardians are failing to fulfil their obligations: they do not visit the residents for long periods of time, do not send care packages, do not maintain contact via telephone, etc. At the same time, the facility's administration has not taken measures to coordinate with child welfare authorities or initiate the replacement of guardians who are failing to properly fulfil their duties. During the preparation of this report, the facility's administration took steps to address this issue, specifically by sending a letter to the chair of the guardianship council regarding the replacement of guardians who are not fulfilling their guardianship duties.

6.3. Systemic Human Rights Violations in Places of Detention Identified through the Review of Individual Complaints

Total number of appeals	9 95
Number of proceedings initiated	2 8
Number of rights restored following appeals (individual and collective)	8 1
Number of responses issued by the Commissioner	7
Number of criminal proceedings initiated based on the results of inspections initiated by the Commissioner	7
Number of instructions issued by prosecutors' offices to address human rights violations in places of detention based on the results of inspections initiated by the Commissioner	6 4

6.3.1. The Right Not to Be Subjected to Torture or Other Cruel, Inhuman, or Degrading Treatment or Punishment

One of the fundamental rights of persons deprived of their liberty is the right not to be subjected to torture or other cruel, inhuman, or degrading treatment or punishment. This right is guaranteed by Article 28 of the Constitution of Ukraine, the Convention for the Protection of Human Rights and Fundamental Freedoms, the Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, the Optional Protocol to the aforementioned Convention against Torture, as well as other international and national laws and regulations.

The prohibition of torture and cruel treatment is absolute. In accordance with Article 64 of the Constitution of Ukraine, the right not to be subjected to torture, cruel, inhuman, or degrading treatment or punishment is not subject to restriction even under martial law or in exceptional circumstances.

As part of parliamentary oversight of the observance of human and civil rights and freedoms, the Commissioner annually identifies instances of violations of these rights in the activities of agencies and institutions involved in the detention of persons. Such violations take various forms—ranging from inadequate conditions of detention and the use of excessive coercive measures to acts that may be classified as torture or other forms of cruel treatment.

Throughout 2025, the Commissioner monitored the state of observance of human and civil rights and freedoms in places of detention not only through the lens of fulfilling the functions of the NPM but also by reviewing complaints from persons held in places of detention and other individuals acting on their behalf. The results of these activities revealed not only violations of fundamental safeguards against torture and ill-treatment but also specific instances containing elements of criminal offenses.

The Commissioner conducted proceedings in cases involving violations of human and civil rights and freedoms following a complaint filed by convicted person N., who is serving a sentence in one of the correctional facilities in the Sumy region, regarding the repeated and unjustified transfer of the convicted person between cells, including to areas where convicted persons smoke, despite the applicant having medical conditions incompatible with such practices, restrictions on the use of permitted personal items, as well as obstruction of his right to maintain contact with the outside world. The applicant also noted that the institution's administration exerted psychological pressure on him in connection with his complaints, with the aim of forcing him to submit a request for transfer to another institution.

Following the results of an investigation initiated by the Commissioner, the Sumy Regional Prosecutor's Office reported that, during the course of the investigation, information was obtained indicating that while N. was being held together with other convicted prisoners, K. and P., with the knowledge of correctional colony administration officials, the convicts began demanding that he

cease filing complaints against the actions of correctional colony representatives, and in late February 2025, they used physical force against N. by striking him on the head with their hands and twisting his arms.

On April 2, 2025, the Prosecutor's Office initiated criminal proceedings regarding this incident on the grounds of a criminal offense under Article 127(1) of the Criminal Code of Ukraine, and a pre-trial investigation is being conducted by the Fourth Investigative Division (stationed in Sumy) of the Territorial Directorate of the State Bureau of Investigations, located in Poltava, under the procedural supervision of prosecutors from the Sumy Regional Prosecutor's Office.

At the same time, the Prosecutor's Office noted that, given the circumstances described above, it appears that N.'s transfer to the cell where P. and K. were being held could be regarded as a means of exerting pressure on the convicted N., and therefore this fact, along with other arguments presented regarding pressure exerted on him by correctional facility staff, threats made, and so on, will be investigated during the pre-trial investigation of the aforementioned criminal proceedings.

Another case in which the Commissioner conducted proceedings concerning violations of human and civil rights and freedoms, specifically regarding the right not to be subjected to torture or other cruel, inhuman, or degrading treatment or punishment.

The Commissioner received a complaint from D., a program coordinator with the Kharkiv Human Rights Group, on behalf of prisoner V., whom a civil society activist had found in a ward of the medical unit at a correctional facility in the Dnipropetrovsk region. Prisoner V. was tied to a metal bed with strips of fabric. He exhibited signs of severe impairment of mobility, speech, and vision, as well as a complete inability to care for himself. A deep, likely infected wound was observed on his right forearm. The sanitary condition of the room and bedding was extremely unsatisfactory.

In response to the violations of prisoner V.'s rights, the Commissioner submitted a report to the Vice Prime Minister of Ukraine for European and Euro-Atlantic Integration of Ukraine—Minister of Justice of Ukraine Olga Stefanishyna.

Following the review of the submission by the Commissioner, the MinJust of Ukraine reported that the HCC SCESU had conducted an additional internal investigation, as a result of which, due to violations of applicable laws in the medical unit of the HCC SCESU in the Dnipropetrovsk and Donetsk regions regarding the treatment of prisoner V., disciplinary measures were taken against the responsible officials — 3 officials of the medical unit received reprimands. It was also reported

that the medical unit's cell facilities were brought into compliance with sanitary standards and legal requirements.

At the same time, a Representative (Deputy) of the Commissioner in the Courts System and on the Right to Fair Trial and Representation in the Constitutional Court of Ukraine sent a letter to the Dnipropetrovsk Regional Prosecutor's Office to initiate a corresponding investigation.

Based on the results of an inspection conducted by one of the district prosecutor's offices of the Dnipropetrovsk region, concerning the fixation of prisoner V. to a bed with bandages by medical unit staff during his inpatient treatment, information was entered into the URPTI regarding the commission of a criminal offense under Article 140(1) of the Criminal Code of Ukraine, on the grounds of improper performance of professional duties by medical personnel.

The violations identified indicate that, even with a well-developed legal framework in place, torture and other forms of cruel, inhuman, or degrading treatment continue to occur in places of detention, which requires strengthened oversight by the MinJust of Ukraine, an effective response from law enforcement agencies to such incidents, and ensuring that those responsible are held accountable.

6.3.2. The Right to Adequate Conditions of Detention

For a long time, the problem of inadequate conditions of detention in pretrial detention facilities and PEs has remained a pressing issue; consequently, grounds for bringing cases before the European Court of Human Rights regarding violations of Article 3 of the European Convention for the Protection of Human Rights and Fundamental Freedoms continue to exist. In its established case law, the European Court of Human Rights has repeatedly emphasized that holding persons in inadequate material and living conditions—in particular, in the absence of sufficient living space, adequate sanitation, and access to light and fresh air—can amount to cruel, inhuman, or degrading treatment.

In 2025, the Commissioner received **295** reports regarding inadequate conditions of detention in places of detention under the MinJust of Ukraine; following these reports, the prosecutor's office issued binding instructions.

In January 2025, the Commissioner received a complaint from prisoner Y. regarding inadequate conditions of detention at one of the pretrial detention facilities in the Kirovohrad region.

Following an inspection initiated by the Commissioner, the Kirovohrad Regional Prosecutor's Office reported that the information in E.'s complaint had

been confirmed: the cell in which he was held felt damp, the walls and ceiling were wet, the bathroom required repairs, and the level of artificial lighting was inadequate.

Consequently, the prosecutor's office issued a binding directive to the head of the detention facility, requiring him to rectify the violations of the law and prevent them from recurring. In compliance with this directive, the prisoner E. and his two cellmates were transferred to another cell where the conditions meet sanitary and hygiene requirements, and no prisoners will be placed in the cell where the applicant was held until renovation work is completed there.

Another aspect of adequate detention conditions is compliance with the per-person space requirement; however, problems related to ensuring this requirement and providing separate detention in PEs and RCs under the MinJust of Ukraine remain unresolved.

In August 2025, the Commissioner received a complaint from prisoner, M., regarding inadequate conditions of detention at one of the pretrial detention facilities in the Mykolaiv region.

Following an inspection initiated by the Commissioner, the Mykolaiv Regional Prosecutor's Office reported that during the inspection conducted by the prosecutor's office, it was established that in the cell where the complainant was held, the actual floor space per detainee at the time of the inspection was less than the standard established by law. Violations of prisoners' rights to material and living conditions were also identified.

To address the identified violations, the Mykolaiv Regional Prosecutor's Office issued a binding directive to the head of the pretrial detention facility to remedy the violations of legal requirements.

For a long time, the problem of overcrowding and inadequate conditions has persisted at Ukraine's largest pretrial detention facility—the SI “Kyiv Pre-Trial Detention Center”.

As part of the review of a parliamentary request on behalf of individuals detained at the SI “Kyiv Pre-Trial Detention Centre,” the Commissioner decided to conduct a targeted visit to the aforementioned pretrial detention facility, during which a failure to comply with the per-person space requirement established by the Law of Ukraine “On Pre-Trial Detention” was documented, as well as inadequate conditions of detention.

In order to address the identified violations, letters were sent to the MinJust of Ukraine and the Kyiv City Prosecutor's Office.

The Kyiv City Prosecutor's Office, responding appropriately to the violations identified by the Secretariat's monitoring group, issued an instruction to the management of the pretrial detention facility pursuant to Article 26 of the Law of Ukraine "On the Prosecutor's Office," demanding that the violations be rectified.

Instead of responding appropriately, the Ministry of Justice of Ukraine sent a letter from the Commissioner's representative to the Department for the Enforcement of Criminal Sentences of the Ministry of Justice of Ukraine and to the Central Administration of the State Penitentiary Service of Ukraine.

Instead of taking appropriate action, the MinJust of Ukraine forwarded the relevant letter from the Commissioner's representative to the Department for the Execution of Criminal Sentences of the MinJust of Ukraine and to the HCC SCESU.

In response to these actions by the MinJust of Ukraine, the Commissioner sent a letter to the Vice Prime Minister of Ukraine for European and Euro-Atlantic Integration of Ukraine – Minister of Justice of Ukraine O. Stefanishyna, in which he demanded a response to the identified violations.

In response, the Vice Prime Minister of Ukraine for European and Euro-Atlantic Integration of Ukraine – Minister of Justice of Ukraine O. Stefanishyna stated that the actions of her subordinates were lawful.

However, disagreeing with the opinion of the head of the Ministry of Justice of Ukraine, the Commissioner sent another letter to the Deputy Prime Minister of Ukraine for European and Euro-Atlantic Integration—Minister of Justice of Ukraine O. Stefanishyna—in which he pointed out not only violations of the rights of individuals at the SI "Kyiv Pre-Trial Detention Centre," which were identified by the monitoring group of the Commissioner's Secretariat, but also the inaction of the Ministry of Justice of Ukraine, as the body responsible for overseeing compliance with human and civil rights, legal requirements regarding the enforcement and serving of criminal sentences, and the realization of the lawful rights and interests of convicts and persons in custody.

Thanks to the Commissioner's firm stance, the individuals on whose behalf the complaint was filed were transferred to cells that comply with the requirements of Article 11 of the Law of Ukraine "On Pre-Trial Detention."

Despite the response measures taken by the prosecutor's office and the Commissioner, the problem of inadequate detention conditions and failure to comply with per-person space standards in pre-trial detention facilities and PEs remains systemic. Therefore, the MinJust of Ukraine should intensify its efforts in this area.

Meanwhile, the Commissioner has also paid attention to places of deprivation of liberty in the social sector. Oversight of the activities of such institutions regarding the provision of social services is carried out by the National Social Service of Ukraine, which, in response to letters from the Commissioner, conducts unscheduled monitoring, identifies violations, provides recommendations for their elimination, and monitors the rectification of deficiencies.

In February 2025, the Commissioner received a complaint from Mr. K. on behalf of Mr. K., who is being held at one of the PNI in the Khmelnytskyi region, regarding violations of his rights to adequate care and social services.

Following an inspection initiated by the Commissioner, the National Social Service of Ukraine reported that no violations of Mr. K.'s rights were found as a result of the inspection; However, violations of the provisions of the Standard Regulation on Psychoneurological Boarding School, approved by KMU (Government of Ukraine) Resolution No. 957 of 14.12.2016, and violations of the Criteria for the Activities of Social Service Providers, approved by KMU (Government of Ukraine) Resolution No. 185 of 03.03.2020, were identified. In particular, the residential facility lacks a qualification certificate confirming that the social service provider has premises that comply with SBS V.2.2-40:2018 "Buildings and Structures. Inclusiveness of Buildings and Structures. General Provisions," and a declaration of conformity of the social service provider's material and technical base with the requirements of fire safety legislation. A review of the personal files of the wards revealed that, in the case of wards who have been declared legally incompetent by a court and have no legal representatives, when the Department of Social Protection of the Population of the Khmelnytskyi Regional State Administration issues admission orders, the provisions of current legislation are violated; specifically, an admission order to the facility is issued based on a request from the chair of the guardianship council, yet there is no decision from the guardianship and custody authority regarding admission to the residential care facility; the boarding school fails to notify, within three days, the guardianship and custody authority with which the ward is registered and the local authority where the boarding school is located, of the ward's admission to the boarding school.

At the same time, the National Social Service of Ukraine reported that the violations identified and the recommendations for their rectification, are set forth in the relevant report on the inspection of compliance with legal requirements regarding the provision of social support and social services, as well as regarding the observance of children's rights, which has been forwarded to the Khmelnytskyi Regional Military Administration and the Khmelnytskyi Regional Council for the

implementation of measures to ensure the observance of the rights of elderly persons and persons with disabilities—residents of the residential care facility.

Monitoring of the observance of the rights of individuals in social care facilities reveals violations that require increased attention from government agencies and oversight by the National Social Service of Ukraine.

6.3.3. The Right to Medical Care

In his annual reports, the Commissioner consistently draws attention to the state of medical care provision in PEs and RCs under the MinJust of Ukraine.

Article 49 of the Constitution of Ukraine guarantees everyone the right to health care and medical assistance, and Article 63(3) of the Constitution establishes that a convicted person enjoys all human and civil rights, with the exception of restrictions defined by law and a court sentence.

Adequate medical care in detention facilities is often provided only following the Commissioner's intervention, primarily for the purpose of conducting examinations, specialist consultations, or fulfilling doctors' prescriptions.

In February 2025, convict D., who is serving a sentence in one of the correctional facilities in the Sumy region, filed a complaint with the Commissioner regarding a violation of his right to medical care.

Following an investigation initiated by the Commissioner, the Sumy Regional Prosecutor's Office reported that one of the district prosecutor's offices had established that there had been a delay in providing adequate medical care to convict D. after a deterioration in his health was detected.

To address the identified violations, one of the district prosecutor's offices in the Sumy region issued instructions to the head of the HCC SCESU in the Sumy region and the head of the correctional facility in accordance with Article 26 of the Law of Ukraine "On the Prosecutor's Office."

However, there are cases where inadequate medical care provided to convicts and prisoners results in their disability.

The Commissioner received an appeal from convict H. regarding a violation of his right to adequate medical care while serving his sentence, which resulted in an amputation.

Following the results of an investigation initiated by the Khmelnytskyi Regional Prosecutor's Office, it was reported that during the investigation into the possible improper provision of medical care to the convict, information was entered into the URPTI on the grounds of a criminal offense under Article 140(1) of the Criminal Code of Ukraine regarding the improper performance of professional duties by medical personnel. The pre-trial investigation of the criminal proceedings is ongoing.

Such violations point to systemic problems in the organization and provision of medical care to detainees and prisoners, which may pose risks to their health, as well as violate the standards of the Convention for the Protection of Human Rights and Fundamental Freedoms and the state's obligation to ensure adequate medical care for persons in places of detention, a point consistently emphasized by the EctHR in its rulings.

Results of monitoring the timeliness of document submission to the Medical and Social Examination Commission (MSEC) and the Expert Teams for Assessing an Individual's Daily Functioning for the determination or renewal of a disability category and/or the assessment of the degree of functional limitation of a person, with respect to convicted persons, and measures taken to ensure that the rights of convicted persons to the timely submission of documents and the conduct of Expert Teams for Assessing an Individual's Daily Functioning are upheld.

Between December 2024 and June 2025, as part of parliamentary oversight, the Commissioner monitored compliance with the rights of convicts to medical care, specifically the timeliness of referring documents to medical-social expert commissions (MSECs) or Expert Teams for Assessing an Individual's Daily Functioning to establish or extend a disability category and determine the degree of functional limitation. The monitoring revealed a number of systemic problems and shortcomings in the organization of this work.

During the reform of the MSEC system, the continuity of document processing was ensured, and KMU (Government of Ukraine) Resolution No. 1338 dated 15.11.2024, established the procedure for transitioning to the Expert Teams for Assessing an Individual's Daily Functioning system and prohibited MSECs from refusing to accept referrals due to the termination of their authority. Order No. 134/5/107 of the MinJust of Ukraine and the MoH of Ukraine dated 16.01.2025, amended the Procedure for Providing Medical Care to Convicts (hereinafter – Order No. 1348/5/572”), which incorporate a new mechanism for assessing the daily functioning of individuals.

Nevertheless, the Commissioner noted instances of significant delays in forwarding documents. In particular, it was only after the Commissioner's submission of 17.03.2025 had been processed that the MinJust of Ukraine announced that it had begun preparing documents for forwarding to the Expert Teams for Assessing an Individual's Daily Functioning concerning prisoner I., who is serving his sentence in a PE in western Ukraine. Previously, the branch of the HCC SCESU in the Chernivtsi, Ivano-Frankivsk, Zakarpattia and Ternopil regions had noted that the referral to the MSEC regarding I., which had been prepared as early as 04.12.2024, had not been submitted due to the reorganisation of the commissions and the lack of a procedure. Subsequently, the documents concerning I. were submitted to the Expert Teams for Assessing an Individual's Daily Functioning; however, on 13.05.2025, they were returned for further processing due to technical shortcomings, which led to a delay of more than three months in resolving the issue of determining I.'s disability group.

The Commissioner identified similar violations in the case of the convicted prisoner S., who is serving a sentence in one of the PEs in the Rivne region. Despite repeated recommendations from doctors to undergo an assessment to determine his disability group, the documents concerning S. were not forwarded due to his lack of a declaration with a family doctor and a Ukrainian passport.

Another case documented by the Commissioner concerns the situation of prisoner N., who is serving a sentence in one of the PEs in the Khmelnytskyi region and has been recognised as a person with a Group III disability until 01.01.2025. At the same time, one of the branches of the HCC SCESU informed the Commissioner's Secretariat in a letter that, following the reform of the MSEC system, N.'s referral had not been processed, as Form No. 088/o had ceased to be valid and the procedure for convicts to undergo the Expert Teams for Assessing an Individual's Daily Functioning had not been established. It was only on 25.03.2025 that the head of the medical unit was granted access to the electronic personal assessment portal; however, the issue remained unresolved.

Overall, according to the results of the Commissioner's monitoring, in most branches of the HCC SCESU and medical units of PEs, there was a wait for further clarifications and technical instructions regarding the submission of documents to the Expert Teams for Assessing an Individual's Daily Functioning and access to the relevant electronic portals, despite the necessary amendments to the regulatory framework having been introduced by Order No. 134/5/107. This indicates the presence of organisational difficulties during the implementation phase of the new expert assessment system.

In response to the identified violations, the Commissioner submitted a report to the Deputy Prime Minister of Ukraine for European and Euro-Atlantic Integration – Minister of Justice of Ukraine O. Stefanishyna.

Following consideration of the submission, the MinJust of Ukraine reported that, as a result of the measures taken, the documents concerning the convicted persons N., S.

and I. had been forwarded to the relevant Expert Teams for Assessing an Individual's Daily Functioning, which had decided to assign them disability groups.

At the same time, the MinJust of Ukraine also noted that, following the inspections it had initiated, the HCC SCESU reported that disciplinary measures had been taken against the officials responsible – a reduction in bonuses.

Consequently, the monitoring carried out by the Commissioner once again demonstrated the need to strengthen control over the activities of subordinate units and to provide such units with timely organisational and methodological assistance from the HCC SCESU.

6.3.4. The Right to Apply for an Old-Age Pension while in a Pre-Trial Detention Facility

At the end of July 2024, the Ukrainian Parliament Commissioner for Human Rights received a letter from lawyer K. on behalf of prisoner K. requesting assistance in applying for the latter's old-age pension, as well as regarding the lack of a mechanism for applying for old-age pensions for persons subject to a preventive measure in the form of detention, in connection with such persons reaching retirement age.

In the course of the proceedings, the Commissioner established that, at the time of lawyer K.'s appeal, the legislation defined the mechanism and procedure for applying for and processing pension payments only in relation to persons who had been sentenced to restriction of liberty or imprisonment; however, no such mechanism or procedure existed for prisoners.

In order to address the identified shortcoming, the Commissioner, pursuant to Article 3(4) of the Law of Ukraine "On the Ukrainian Parliament Commissioner for Human Rights", wrote to the Head of the Pension Fund of Ukraine in August and October 2024 regarding the need to amend the Procedure for the submission and processing of documents for the award (recalculation) pensions in accordance with the Law of Ukraine "On Compulsory State Pension Insurance", approved by Resolution No. 22-1 of the Board of the Pension Fund of Ukraine dated 25.11.2005 (as amended by Resolution No. 13-1 of the Board of the Pension Fund of Ukraine dated 07.07.2014), and regulating the procedure for submitting applications for the award of pensions by persons subject to a preventive measure in the form of detention.

Furthermore, in October 2024, the Ukrainian Parliament Commissioner for Human Rights addressed the Deputy Prime Minister of Ukraine for European and Euro-Atlantic Integration – Minister of Justice of Ukraine regarding the need to address the relevant gap in the legislation and to consider the issue of regulating the procedure for the administration of pre-trial detention facilities in the event that a detainee reaches the age at which a pension is granted.

In November 2024, the MinJust of Ukraine announced that, with a view to clarifying certain provisions governing state pension provision for prisoners on grounds of age, disability, due to the loss of a breadwinner and in other cases provided for by pension legislation, the MinJust of Ukraine had prepared a draft order “On Amendments to Certain Regulatory Acts of the Ministry of Justice of Ukraine”, proposing amendments, in particular to the Internal Rules of Pre-Trial Detention Centres of the State Penitentiary Service of Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 1769/5 of 14.06.2019, registered with the Ministry of Justice of Ukraine on 18.06.2019 under No. 633/33604, (as amended on 27.09.2024), by supplementing them with a new Section XII (Pension Provision for Detainees and Convicts), which sets out the procedure for detainees and staff of the State Criminal-Executive Service of Ukraine’s remand centres to apply for and receive pensions in accordance with the legislation on pension provision.

In January 2025, the MinJust of Ukraine informed the Commissioner that on 09.01.2025, Order No. 86/5 of the Ministry of Justice of Ukraine “On Amendments to Certain Regulatory Acts of the Ministry of Justice of Ukraine” had been adopted, registered with the Ministry of Justice of Ukraine on 10.01.2025 under No. 57/43463 (as of 10.01.2025).

At the same time, due to the prolonged failure to resolve the issue regarding the regulatory framework for the procedure for the personal reception of persons in custody by employees of the Pension Fund of Ukraine, on 31 January 2025, the Ukrainian Parliament Commissioner for Human Rights submitted a proposal to the Minister of Social Policy of Ukraine; following consideration of this proposal, the said Ministry informed that the Pension Fund of Ukraine had drafted a resolution of the Pension Fund of Ukraine’s Board “On Amending Paragraph 1 of Section III of the Regulations on the Organisation of Reception and Service for Persons Applying to the Bodies of the Pension Fund of Ukraine”, which proposes to resolve the issue outlined in the Commissioner’s submission.

In April 2025, in response to a submission from the Commissioner, the Pension Fund of Ukraine announced that the Board of the Pension Fund of Ukraine had adopted Resolution No. 13-1 of 31.03.2025 “On Amendments to Paragraph 1 of Section III of the Regulations on the Organisation of Reception and Service for Persons Applying to the Bodies of the Pension Fund of Ukraine”, which was registered with the Ministry of Justice of Ukraine on 16.04.2025 under No. 585/4399190 and entered into force on 19.05.2025.

Consequently, following the results of parliamentary oversight and the appropriate response from the MinJust of Ukraine, as well as the firm stance of the Ukrainian Parliament Commissioner for Human Rights, the Pension Fund of Ukraine has amended the departmental regulatory legal acts of the aforementioned bodies, which are now consistent with one another and will facilitate the observance of the pension rights of persons subject to pre-trial detention.

6.3.5. The Right to Receive Social Benefits in the Full Amount

In 2024, as part of parliamentary oversight of the observance of constitutional human and civil rights and freedoms, the Commissioner investigated the issue of compliance with the requirements of Article 115(4) of the CEC Ukraine, during which violations were identified regarding deductions from social benefits paid to persons sentenced to imprisonment and life imprisonment, who received these benefits as persons not entitled to a pension.

In order to resolve the identified problem, in 2024 the Commissioner submitted a submission to the MinJust of Ukraine, following which the MinJust of Ukraine, amongst other things, reported that the situation regarding the observance of prisoners' rights was under the Ministry's supervision.

However, in 2025 the Commissioner again identified a similar problem.

In accordance with Article 121(1) of the CEC Ukraine, persons serving sentences in penal colonies shall reimburse the costs of their maintenance, excluding the cost of food, footwear, clothing, underwear, special dietary provisions and special clothing, and in accordance with Article 115(4) of the CEC Ukraine, persons with disabilities of the first and second groups, women who are more than four months pregnant, non-working women who have children in children's homes attached to penal colonies, unemployed men over the age of sixty and women over the age of fifty-five (provided they do not receive a pension), as well as persons released from work due to illness, including those suffering from active tuberculosis, are provided with utility and domestic services free of charge.

In March 2025, a convicted person, P., who is serving a sentence in one of the correctional institutions of Rivne region, applied to the Commissioner regarding the alleged unlawful deductions for maintenance payments from his social assistance as a person with a Group III disability.

In the course of the Commissioner's proceedings in the case concerning the violation of human and civil rights and freedoms, it was established that at the time of his appeal to the Commissioner, the applicant had reached the age of 60.

Given that the applicant had reached the age of 60 and does not receive a pension, but is instead a recipient of state social assistance, as part of the proceedings conducted by the Commissioner in April 2025, a submission was made to the Deputy Prime Minister of Ukraine for European and Euro-Atlantic Integration of Ukraine – the Minister of Justice of Ukraine – a submission was made regarding the urgent adoption of measures to remedy the violation of Article 115(4) of the CEC Ukraine and the return of unlawfully deducted funds to the applicant's personal account from the moment he reached the age of 60.

Following consideration of the submission, the MinJust of Ukraine informed the applicant by letter dated 28.05.2025 that deductions from the applicant's social assistance had been discontinued, and that the funds withheld for the period from when he reached the age of 60 until April 2025, amounting to over 4,500 UAH, were returned to his personal account in May 2025.

Furthermore, following a request from the MinJust of Ukraine, relevant inspections were conducted, the results of which confirmed that unlawful deductions had been made from the social assistance payments not only of the applicant but also of three other prisoners in different institutions. Following the inspections, internal investigations were conducted, two officials were held disciplinarily liable, and the unlawfully withheld funds were returned to the personal accounts of the three prisoners. The total amount of funds returned was 80,000 hryvnias, of which nearly 60,000 went to a single individual.

Consequently, the situation identified by the Commissioner once again demonstrated the need to strengthen oversight of the activities of the Ministry of Justice's regional bodies, particularly regarding the enforcement of criminal sentences, and of enterprises, institutions and organisations falling within the Ministry of Justice's remit that were established to carry out the tasks of the SCESU of Ukraine.

RECOMMENDATIONS:

To the Ministry of Justice of Ukraine:

to develop and implement a comprehensive programme to combat segregation and discrimination among prisoners and convicted persons;

to accommodate prisoners/convicts in living quarters in accordance with the space standards established by national and international regulatory legal acts;

to develop and implement a comprehensive programme to bring the conditions of detention in PEs and RCs into line with national and international standards, providing for the improvement of the material and technical infrastructure, carrying out repair works in cells, replacing utilities and equipment with modern sanitary and hygiene facilities, installing video surveillance systems, ensuring adequate lighting (natural and artificial), and maintaining sanitary and hygiene standards;

to amend the Internal Rules of Procedure for Penal Institutions, approved by Order of the Ministry of Justice of Ukraine No. 2823/5 of 28.08.2018, the Internal Rules of Procedure for Remand Centres of the State Penitentiary Service of Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 1769/5 of 14.06.2019, the Procedure for the Use of Technical Means of Surveillance and Control in Correctional and Educational

Colonies of the State Penitentiary Service of Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 2025/5 of 26.06.2018, and to regulate the use of video surveillance so that its use in living quarters and cells is permitted only in exceptional cases involving an increased risk to the safety of individuals or the possibility of harm to themselves, other prisoners or the institution's staff;

to draft regulatory legal acts setting out the procedures for the detention of prisoners of war in camps, including:

- internal regulations of the camps;
- procedures for bringing prisoners of war to disciplinary responsibility;
- specifics of their employment and the remuneration of prisoners of war;
- organisation of bath and laundry services;
- ensuring the regime, security and supervision in prisoner of war camps;
- inventory and maintenance of furniture, equipment and household items, and

the standards for their provision and maintenance;

- use of technical means of surveillance and control;

to introduce an effective and efficient system of administrative control over the activities of camps for the detention of prisoners of war;

to take measures to ensure compliance with the principle of equivalence of medical care by bringing the standard of medical services in prisons into line with the standards guaranteed by the state for all citizens, through the integration of prison healthcare into the Unified Healthcare System;

to ensure full integration with the eHealth of the Ministry of Health of Ukraine and the Unified Healthcare System;

to ensure systematic diagnosis, treatment and infection control for tuberculosis and viral hepatitis C in accordance with the standards of the Ministry of Health of Ukraine;

to strengthen the system for the provision of psychiatric care in institutions of the SCESU, ensuring the implementation of treatment programmes for persons with mental and behavioural disorders, including those resulting from the use of psychoactive substances;

to ensure appropriate regulatory and organisational oversight of the activities of the HCC SCESU, aimed at the effective implementation of the principle of equivalence of medical care in REs and RCs;

to take measures to staff medical units, in particular with general practitioners (family doctors), psychiatrists, dentists and clinical psychologists, by reviewing pay conditions, incentive mechanisms and simplifying recruitment procedures;

to ensure adequate funding for the procurement of medicines and medical devices, thereby eliminating the practice of placing the responsibility for providing treatment on the relatives of convicted persons and prisoners;

to strengthen oversight of compliance with procedures for documenting bodily injuries, ensuring mandatory notification of the prosecution authorities and the proper completion of medical documentation with photographic evidence;

to ensure the creation of appropriate conditions for the provision of medical care, including the provision of separate rooms for confidential patient consultations, facilities for the storage of medical waste, and isolation wards for patients with infectious diseases, in compliance with infection control standards;

to ensure the integration of convicted persons and prisoners into the eHealth and ensure that agreements are concluded with primary care doctors, thereby enabling the right to healthcare services under the Medical Guarantees Programme to be realised;

to ensure, without delay, the continuity of treatment for chronic conditions, in particular diabetes mellitus, cardiovascular diseases and other conditions requiring ongoing pharmacotherapy, eliminating instances where essential medicines are unavailable;

to strengthen infection control measures, in particular regarding the separate accommodation of persons with tuberculosis and other infectious diseases, in accordance with sanitary and epidemiological requirements;

to ensure that the principle of voluntariness is upheld in the provision of psychiatric care, with written informed consent being a mandatory requirement for psychiatric assessment and treatment;

to expand the OST programme, ensuring its availability in all institutions, including RCs, and guarantee the continuity of treatment;

to ensure the proper maintenance of medical records, in particular the full documentation of reports on bodily injuries with photographic evidence and a record of the fact that the competent authorities have been notified.

To the National Police of Ukraine:

to enter details of criminal offences falling within the jurisdiction of the State Bureau of Investigations into the URPTI, and to immediately inform the regional offices of the State Bureau of Investigations of any instances where police officers have used physical force against members of the public;

to develop and approve a procedure for action upon receipt of information that may indicate the commission of a criminal offence by a police officer (assault, use of special equipment and physical force, unlawful detention), taking into account the criteria for effective investigation (independence and impartiality, thoroughness, urgency, competence, involvement of victims and public oversight);

to introduce a unified record-keeping system to document instances of the use of special equipment and physical force, including the maintenance of logs, registers or

records, and ensure mandatory written notification to the head of each instance, with a view to monitoring the lawfulness of such use;

to draft and approve departmental regulatory legal acts providing for the establishment and operation of facilities for the detention of persons subject to administrative arrest and held in custody for more than 72 hours, as well as to expand the range and frequency of activities available to such persons during their detention in TDFs;

to amend the Instructions on ensuring the regime of detention and security of persons held in TDFs of the National Police of Ukraine, approved by Order of the Ministry of Internal Affairs No. 777 dated 25.09.2023, by supplementing them with provisions regarding the procedures to be followed by staff of TDFs during an “Air Raid Alert” signal and other military threats;

prior to the introduction of amendments to the Instruction, to develop and communicate to each Temporary Detention Facility (ITT) methodological guidelines setting out step-by-step actions and the distribution of responsibilities that personnel are obliged to perform immediately upon receiving an “Air Raid Alert” signal.

To the State Border Guard Service of Ukraine:

to introduce a programme for the comprehensive elimination of systemic shortcomings in the area of procedural safeguards at temporary detention facilities by implementing:

to mandatory and documented involvement of interpreters during detention and the preparation of procedural documents;

to provision of information to detainees about their rights in a language they can understand;

to strict compliance with the obligation to notify close relatives of the fact of detention;

to provide systematic training for staff on the standards of national and international law.

To the Ministry of Defence of Ukraine:

to eliminate the shortage of living space in disciplinary battalions, guardhouses, and holding rooms for detained servicemen, and to ensure appropriate conditions for daily outdoor exercise;

to establish a proper procedure and regularity for medical examinations of persons held in disciplinary battalions, guardhouses and detention rooms for detained military personnel.

To the State Migration Service:

to standardise the procedure for ensuring that foreign nationals and stateless persons can maintain contact with the outside world (the ability to use their own mobile phones without restriction throughout the day) at PTPIs by amending the Instructions on the Procedure for the Holding of Foreigners and Persons Illegally Staying in Ukraine at PTPIs, approved by Order of the Ministry of Internal Affairs of Ukraine No. 141 dated 29.02.2016, and to remove excessive discretionary powers of PTPIs administrations in line with identified best practices;

to ensure the use of designated rooms in PTPIs in accordance with regulatory requirements. Initiate amendments to the Instructions on the Procedure for the Holding of Foreigners and Persons Illegally Staying in Ukraine in PTPIs, approved by Order No. 141 of the Ministry of Internal Affairs of Ukraine dated 29.02.2016.

To the National Anti-Corruption Bureau of Ukraine:

to introduce a set of measures aimed at complying with the requirements of the CPC Ukraine regarding the adoption of internal regulations defining the powers, rights and duties of officials responsible for ensuring the rights of detained persons, as well as a clear procedure for recording all actions relating to detainees, and to appoint such responsible officials.

To the State Bureau of Investigations:

to develop and approve a program of measures aimed at:

- ensuring respect for the dignity of individuals during detention;
- properly documenting every instance of the use of physical force and special means, followed by oversight by management;
- conducting procedural actions with detainees exclusively in specially equipped premises with mandatory audio and video recording;
- guaranteeing timely and unimpeded access for detainees to legal counsel.

To the State Judicial Administration of Ukraine:

to ensure compliance with the requirements of SBS V.2.2–26:2010 and the Instruction on the Organisation of Escort and Detention in Courts of Accused (Defendants) at the Request of Courts, approved by a joint order of the Ministry of Internal Affairs of Ukraine, the Ministry of Justice of Ukraine, the Supreme Court of Ukraine, the High Specialized Court of Ukraine for Civil and Criminal Cases, the State Judicial Administration of Ukraine, and the Prosecutor General's Office of Ukraine dated 26.05.2015, No. 613/785/5/30/29/67/68, by providing:

- detention cells for defendants (accused persons) and convicts with an area of at least 4 m², calculated at three cells for each courtroom for the hearing of criminal cases;

- sanitary facilities for defendants (accused persons) and convicts;
- isolated routes for conveying defendants and convicts to courtrooms.

To the Ministry of Health of Ukraine:

to update the regulatory framework governing the use of restraints in psychiatric facilities, specifically Order No. 240 of the Ministry of Health of Ukraine dated 24.03.2016, taking into account international standards, with the aim of bringing it into line with the recommendations of the European Committee for the Prevention of Torture, “Means of restraint in psychiatric establishments for adults” (CPT/Inf(2006)35-part);

to take measures to ensure adequate staffing of psychiatric institutions: increase the number of psychiatrists, nurses, junior medical staff, other medical specialists, social workers, and rehabilitation specialists in accordance with patients’ needs;

to ensure compliance with requirements regarding the obtaining of voluntary, informed, and properly documented consent from patients for medical intervention;

to strengthen oversight of medical record-keeping, particularly regarding the documentation of instances of physical restraint and isolation;

to organize systematic training for medical staff on human rights, ethical standards for patient care, and the prevention of cruel or degrading treatment;

to ensure proper oversight of compliance with requirements for the storage of medications and prevent the use of expired drugs.

To the Ministry of Social Policy, Family, and Unity of Ukraine:

to ensure the implementation of the Operational Plan of Measures for the 2025–2027 implementation of the Strategy for Reforming Psychoneurological and Other Residential Institutions and Deinstitutionalisation of Care for Persons with Disabilities and Older Persons until 2034, particularly regarding the actual transition from formal care to a person-centered support system;

to ensure regulatory and methodological regulation of social rehabilitation and preparation for independent living for persons residing in psychoneurological and other residential institutions;

to develop and approve methodological recommendations on organizing cultural and recreational activities in residential institutions, defining the functional responsibilities of the organizer of cultural and recreational activities, as well as the forms and types of work with residents, taking into account their individual needs and the provisions of the Convention on the Rights of Persons with Disabilities;

to develop and approve procedures for guardianship and custody authorities to carry out activities related to the protection of the rights of adults in need of guardianship or custody, as well as a mechanism for monitoring and overseeing the exercise of rights by legally incapacitated persons or persons with limited legal capacity.

To the Regional State (Military) Administrations of Vinnytsia, Volyn, Dnipropetrovsk, Zhytomyr, Zakarpattia, Zaporizhzhia, Ivano-Frankivsk, Kyiv, Kirovohrad, Lviv, Mykolaiv, Odesa, Poltava, Rivne, Sumy, Ternopil, Kharkiv, Kherson, Khmelnytskyi, Cherkasy, Chernihiv, and Chernivtsi Regions, and to the Kyiv City State (Military) Administration:

to ensure proper oversight of residential care facilities' activities regarding the implementation of social rehabilitation measures and the preparation of residents for life in the community;

to strengthen oversight of the comprehensive assessment of the individual needs of social service recipients, the development of individual social service plans, and their regular review;

to create conditions for the development of the creative, professional, and intellectual potential of residents;

to ensure interagency cooperation between social welfare institutions and local government bodies with the aim of integrating residents into the life of local communities;

to introduce mandatory annual training for staff at social welfare institutions on respecting the right to liberty and personal integrity and preventing cruel, inhuman, or degrading treatment;

to provide methodological guidance and training for staff at residential care facilities on organizing meaningful occupational therapy within such facilities;

to ensure systematic monitoring of compliance with the right to freedom of movement for residents in social welfare institutions;

to ensure systematic monitoring of compliance by residential institutions with the right of legally competent residents to own, use, and dispose of their own funds, including pension payments and other forms of social assistance;

to ensure that measures are taken to address identified instances of improper disposal of residents' funds, including by initiating internal audits and notifying law enforcement agencies if signs of criminal offenses are detected.

To the Regional Councils of Vinnytsia, Volyn, Dnipropetrovsk, Zhytomyr, Zakarpattia, Zaporizhzhia, Ivano-Frankivsk, Kyiv, Kirovohrad, Lviv, Mykolaiv, Odesa, Poltava, Rivne, Sumy, Ternopil, Kharkiv, Kherson, Khmelnytskyi, Cherkasy, Chernihiv, and Chernivtsi, and to the Kyiv City Council:

to take measures to ensure adequate staffing at residential care facilities, including the addition of positions for social workers and cultural and recreational activity coordinators to staffing plans, and provide professional development for staff on issues related to deinstitutionalization and the social integration of people with disabilities.

7. THE RULE OF LAW AND ACCESS TO JUSTICE

Number of appeals	6,169
Number of open proceedings	81
Number of restored rights	984
Number of draft regulatory legal acts reviewed	597
Number of monitoring observations	433
Number of responses issued by the Commissioner (submissions)	5

In 2025, the functioning of Ukraine's judicial system, in the context of ensuring the right of every individual to access to justice, took place under martial law, amid ongoing institutional reforms, and as the judicial process adapted to extraordinary circumstances. The combination of these factors directly affected both the organization of court operations and the practical ability of individuals to exercise their right to judicial protection.

Throughout the year, the trend of increased caseloads on the courts persisted, largely due to staff shortages, the uneven distribution of cases among courts in different regions, and limited capacity to promptly restore full-scale operations of judicial institutions in frontline territories.

At the same time, in 2025, the development of tools for remote participation in court proceedings and electronic justice services continued, as these were viewed as one of the ways to minimize organizational barriers to access to justice. Their practical application demonstrated both the positive potential for ensuring procedural continuity and the need to take into account the individual capabilities of participants in the process, particularly socially vulnerable individuals, for whom digital formats are not always a full-fledged alternative to in-person participation in court proceedings.

The legislative changes adopted in 2025 regarding the judicial system and judicial proceedings were aimed at streamlining procedures, improving the efficiency of case adjudication, and ensuring the stability of the judicial system's operations under martial law. At the same time, certain legislative decisions required further assessment given their impact on the scope of procedural guarantees and individuals' actual access to the courts. In this regard, the Commissioner monitored relevant initiatives and provided proposals and comments, emphasizing the need to uphold constitutional standards regarding the right to judicial protection and to prevent its erosion.

In 2025, the personnel composition of the judicial system underwent significant changes, accompanied by both the dismissal of a significant number of judges and the resumption of procedures to fill vacant judicial positions.

According to the HCJ²³, as of 15.12.2025, decisions were made to dismiss 209 judges between January and November. The vast majority of them—170 individuals—left their posts under normal circumstances. Specifically, 160 judges were dismissed following the submission of resignation requests (including 115 local court judges, 39 appellate court judges, and 6 Supreme Court judges), while another 10 local court judges resigned voluntarily. At the same time, decisions were made to dismiss 39 judges of the High Council of Justice under special circumstances: 29 individuals were dismissed for committing a serious disciplinary offence, and 10 were dismissed pursuant to subparagraph 4 of paragraph 16¹ of Section XV “Transitional Provisions” of the Constitution of Ukraine, in accordance with submissions containing recommendations from the HQCJ.

In addition, it is worth noting the positive trend regarding the filling of vacant judicial positions in 2025. Between January and November 2025, the HCJ adopted decisions to submit to the President of Ukraine proposals for the appointment of 148 candidates to judicial positions. By court level and jurisdiction, these nominations were distributed as follows: 52 judges were recommended for local general courts, 4 for local commercial courts, and 1 for local administrative courts; 25 to general courts of appeal, 36 to commercial courts of appeal, 28 to administrative courts of appeal, and 2 judges to the HACC.

As a result of this work, the President of Ukraine has approved the vast majority of nominations; since the beginning of the year, the President of Ukraine has appointed 123 judges. In particular, by Presidential Decrees No. 318/2025–332/2025 of 23.05.2025, 22 judges were appointed to local courts; By Presidential Decrees of 03.06.2025, No. 362/2025–378/2025, 23 judges were appointed to local courts and the HACC; by Presidential Decrees of 13.12.2025, No. 930/2025–965/2025, 78 judges were appointed to appellate and local courts.

Ensuring the continuity of these processes was made possible by the work of the HQCJ, which in 2025 combined the completion of competitive procedures announced in previous years with the launch of new competitions. The active phase of the new selection process for local court judges, announced on 11.12.2024, took place in 2025.

At the same time, in 2025, a competition was underway to fill 550 vacant positions in the courts of appeal, which had been announced back in September 2023. Following the completion of the qualification assessments and interviews in November–December 2025, the HQCJ began the process of recommending the successful candidates. This was a significant practical step toward addressing the staffing shortage in appellate courts: for

²³ <https://hcj.gov.ua/news/protyagom-sichnya-lystopada-2025-roku-zvilneni-209-suddiv>

example, in December, 10 candidates were recommended for appointment to the Zakarpattia Court of Appeal, 16 to the Zaporizhzhia Court of Appeal, and 22 to the Chernihiv Court of Appeal. Currently, as part of this competition, the HQCJ continues to conduct interviews with candidates specializing in criminal and civil law, as well as to approve rankings of candidates for vacant judicial positions in the respective appellate courts.

A separate focus of work in 2025 was the competition to fill 23 vacant positions at the HACC, announced in June 2025.

As of December 2025, the HQCJ had approved the coded results of the fourth stage of the qualification exam (completion of a practical assignment) for 85 candidates²⁴.

In addition, in October 2025, a competition was announced to fill 27 positions in the newly established specialized administrative courts (17 vacancies in the Specialized District Administrative Court and 10 in the Specialized Administrative Court of Appeal).

At the same time, according to information from the HQCJ, as of 01.01.2026, Ukraine continues to have a consistently high number of vacant judicial positions. Of the 6,600 positions provided for in the staffing table, 2,254 remain vacant.

A significant part of the staffing shortage is in the courts of first instance (local courts), where 1,400 positions are vacant, as well as in the appellate courts, where 725 positions currently remain vacant.

In the Higher Specialized Courts and the Supreme Court, there are 80 and 49 vacancies, respectively.

To further analyse the quantitative indicators characterizing the scale of the staffing shortage in Ukraine's judicial system, it is advisable to refer to other statistical data from the HQCJ. According to information received from the HQCJ in response to a request from the Commissioner's Secretariat, as of 31.12.2025, 156 individuals appointed to the position of judge for a five-year term lost their authority upon the expiration of that term and, consequently, are not administering justice. Of these, only 28 individuals were found to be qualified for their positions. For 26 judges, a lack of qualification for their positions was established, and consequently, a motion for their dismissal was submitted to the HCJ. The largest group—102 individuals—consists of judges for whom the qualification assessment has not been completed. Of these, 20 are undergoing a qualification assessment to confirm their ability to administer justice in courts of appeal or the HACC. A separate group consists of judges appointed (elected) to courts that have ceased to administer justice, and the territorial jurisdiction of their cases has been transferred to other courts. There are 448 such individuals. At the same time, for 60 of them, a decision on secondment to other courts to continue administering justice has not yet been made.

²⁴ <https://www.vkksu.gov.ua/news/zatverdzheno-rezultaty-chetvertogo-etapu-kvalifikatsiynogo-ispytu-v-mezhah-konkursu-na>

The data presented demonstrate that the problem of a shortage of judges is linked not only to the limited number of new appointments, but also to lengthy assessment procedures, institutional transformations within the judicial system, and a lack of timely management decisions regarding the reallocation of human resources.

Consequently, the issue of judges' caseloads remains a pressing concern. Among other things, it is worth noting the decision of the HCJ of Ukraine dated 30.09.2025 "On the Approval of Standards for Staffing, Financial and Logistical Support of Courts, as well as the Methodology for Calculating the Number of Judges in Courts of First Instance and Appellate Courts and the Methodology for Calculating the Projected Number of Cases in Courts of First Instance and Appellate Courts".

However, it is not only the issue of excessive workload on judges that is important. The issue of adequate logistical support for courts is a fundamental challenge for the functioning of the justice system in Ukraine, which directly affects the state's ability to guarantee the right to have a case heard within a reasonable time. The importance of this aspect at the state level was confirmed by the Order of the Cabinet of Ministers of Ukraine of 14.05.2025 No. 475-r "Certain issues related to the negotiation process for Ukraine's accession to the European Union under Cluster 1: Fundamentals of the accession process", which approved the Rule of Law Roadmap.

This strategic document identifies as one of its priority measures the consistent provision of adequate financial and human resources to courts and institutions within the justice system, as well as the establishment of a competitive level of judicial remuneration, which must take into account the actual workload, significance and responsibility of the role. A key step towards fulfilling these European integration commitments was the adoption of the HCJ's Decision No. 2015/0/15-25 of 30.09.2025, which approved scientifically grounded standards for the staffing, financial and logistical support of courts, as well as the Methodology for calculating the number of judges and the projected caseload in courts of first instance and appeal. The introduction of these standards is critical for an objective assessment of the judicial system's actual needs and the transition to effective budget planning, as it is impossible to ensure the stable functioning of the justice system without clearly defined indicators of acceptable caseloads.

In this context, alongside regulatory measures to manage the workload, the State has taken the first positive steps towards resolving the issue of establishing competitive salaries for court staff.

In particular, the Law of Ukraine "On Amendments to Certain Laws of Ukraine Regarding the Introduction of Unified Approaches to the Remuneration of Civil Servants Based on Job Classification", adopted by the Verkhovna Rada (Parliament) of Ukraine, introduced amendments to the Law of Ukraine "On Civil Service", whereby, for the duration of the martial law introduced by Decree of the President of Ukraine No. 64/2022

of 24.02.2022 No. 64/2022 “On the Introduction of Martial Law in Ukraine”, approved by the Law of Ukraine “On the Approval of the Decree of the President of Ukraine “On the Introduction of Martial Law in Ukraine”” of 24.02.2022 No. 2102-IX, and for a period of six months from the date of its termination or repeal, the Cabinet of Ministers of Ukraine is empowered to establish additional adjustment coefficients for remuneration. At the same time, for civil servants in the administrative offices (secretariats) of courts, other bodies and institutions of the justice system, the establishment of other coefficients to basic salaries is also permitted, including at the expense of the special fund of the State Budget of Ukraine.

The amendments also provide that, pending legislative regulation in the Law of Ukraine “On the Judicial System and the Status of Judges” of the specific features of remuneration for civil servants in the administrative offices (secretariats) of courts and other bodies and institutions of the justice system, for the purpose of determining the levels of basic salaries, courts, bodies and institutions of the justice system whose jurisdiction extends to the territory of the Autonomous Republic of Crimea, the regions, and the cities of Kyiv and Sevastopol shall be classified as other state bodies whose jurisdiction extends to the entire territory of Ukraine; their administrative offices (secretariats), and district, interdistrict, district within cities, city and city-district courts – to state bodies whose jurisdiction extends to the territory of the Autonomous Republic of Crimea, one or more regions, the cities of Kyiv and Sevastopol, and regional branches of a permanent state body established by the President of Ukraine.

Furthermore, on 01.09.2025, the Cabinet of Ministers of Ukraine adopted Resolution No. 112 “On the Establishment of the Rates of the Additional Coefficient for Increasing the Basic Salaries of Civil Servants in Court Administrations and Other Bodies of the Justice System”, which stipulates that, temporarily, for the duration of martial law, an additional coefficient for increasing official salaries shall apply, as determined by the salary scale for civil service posts, taking into account family status, post levels, jurisdiction and types of state bodies in 2025, approved by Government Resolution No. 1409 of 29.12.2023 “Issues of Remuneration for Civil Servants Based on the Classification of Posts in 2025”: to the official salaries of civil servants in the administrative bodies of local general courts that have carried out the classification of civil service posts – at a rate of 1.19; to the basic salaries of civil servants in the administrative offices of courts of appeal, district administrative courts, commercial courts, territorial departments of the State Judicial Administration of Ukraine, and territorial units of the Court Security Service that have carried out the classification of civil service posts – at a rate of 1.3.

These measures will undoubtedly have a positive impact on resolving the aforementioned issues in the long term. However, the trend towards a rapid decline in the prestige of the judicial profession is a cause for deep concern, as highly qualified

candidates in the final stages of competitive selection procedures are turning down appointments, preferring private practice or public service in other bodies. This situation is a direct consequence of the fact that the level of judicial remuneration and the material and technical support provided to courts in general, particularly in local courts, does not correspond to the enormous workload and responsibility placed upon them.

No less important is the issue of physical access to justice for citizens. According to official data from the State Judicial Administration of Ukraine and reports by the High Council of Justice, by the end of 2025 Ukraine's judicial infrastructure had suffered significant losses as a result of the armed aggression of the Russian Federation.

As of 25.12.2025²⁵, since the start of the full-scale armed aggression by the Russian Federation against Ukraine on 24.02.2022, 176 premises belonging to 167 judicial institutions have sustained damage of varying degrees, ranging from partial damage to complete destruction and looting of property, of which: 167 premises are courts (154 courts); 6 premises of the Territorial Department of the State Judicial Administration of Ukraine and the Territorial Department of the Court Security Service (in the Donetsk, Zaporizhzhia, Mykolaiv, Odesa, Kharkiv, Chernihiv and Kherson regions); 2 premises of the National School of Judges of Ukraine (the Lviv regional branch of the National School of Judges of Ukraine is co-located with the Sykhiv and Halytskyi courts of the city of Lviv and the Lviv District Administrative Court); 1 premises of the HQCJ. 16 court premises are currently considered to be completely destroyed. Most of the damaged facilities are concentrated in frontline and de-occupied regions: Kharkiv region – 28 premises, Donetsk region – 24 premises, Mykolaiv region – 21 premises.

Throughout 2025, numerous cases of new or repeated destruction were recorded. The building of the Kupiansk City and District Court (Kharkiv region) was completely destroyed as a result of shelling on 13.05.2025. On 29.09.2025, the building of the Pokrovsk District Court (Dnipropetrovsk region) was destroyed as a result of shelling.

The year 2025 became a period of intensified attacks on judicial infrastructure, particularly in frontline cities (Dnipro, Zaporizhzhia, Kharkiv, Sumy, and Kherson) and in de-occupied territories. A distinctive feature of 2025 was the high number of repeated damages to facilities that had already been partially restored.

Financial needs for reconstruction at the end of the year are estimated at over UAH 2.6 billion. Continuous shelling involving guided aerial bombs and unmanned aerial vehicles has resulted in damage to court buildings even in rear regions (Kyiv, Khmelnytskyi, and Lviv), thereby complicating the uninterrupted administration of justice.

²⁵ chrome-

extension://efaidnbmnnnibpcajpcglclefindmkaj/https://court.gov.ua/storage/portal/dsa/analit_poshkodj_prymish/2025/Analit_25.12.25.pdf

The year 2025 marked a decisive stage for the Ukrainian judicial system in the context of European integration. The main focus shifted from the adoption of framework legislation to the practical implementation of reforms and the opening of negotiation clusters. At the beginning of 2025, Ukraine officially completed the screening procedure (assessment of compliance) of its legislation with EU law under the first and most important cluster, “Fundamentals.” This includes Chapter 23, “Judiciary and Fundamental Rights.”

The Government and the judiciary developed and approved a clear action plan until 2030, which became a prerequisite for the opening of accession negotiations. According to the assessment of the European Commission, presented in its annual report of November 2025, Ukraine’s progress in the field of justice was rated as “good,” representing one of the strongest results in recent years.

The year 2025 was marked by the establishment of new institutional structures aimed at reducing the burden on the judicial system and enhancing its transparency. In September 2025, the President signed laws on the establishment of the Specialised District Administrative Court and the Specialised Appellate Administrative Court. This decision is intended to replace the dissolved Kyiv District Administrative Court and ensure that cases against central executive authorities are heard in accordance with European standards. The HQCJ of Ukraine launched large-scale competitive selection procedures to fill more than 2,000 vacancies in courts of first instance and appellate courts. The disciplinary inspectors of the HCJ began actively reviewing complaints against judges that had accumulated over a number of years. Despite significant progress, international partners ²⁶and civil society organisations in 2025 continued to emphasise the need for further reform of the prosecution service and strengthening of the independence of the legal profession, which remains a priority for 2026.

At the same time, in the area of constitutional justice, the issue of the quorum of the Constitutional Court of Ukraine became particularly critical in 2025: for a significant part of the year, the Court’s work was effectively paralysed due to the insufficient number of judges.

In accordance with the Law of Ukraine “On the Constitutional Court of Ukraine,” sittings of the Grand Chamber and plenary sittings of the Court are valid only if at least 12 judges are present. Accordingly, since the end of January, the Constitutional Court of Ukraine has been unable to adopt final decisions in cases.

On 27.01.2025, the mandates of three judges expired. After that, the Constitutional Court of Ukraine was left with only 11 judges, out of the 18 required by the Constitution of Ukraine.

²⁶ chrome-extension://efaidnbmnnnibpcajpcglclefindmkaj/https://www.ecoi.net/en/file/local/2132152/ukraine-report-2025.pdf

The situation changed ahead of Constitution Day. On 27.06.2025, the President of Ukraine signed Decree No. 438/2025, appointing O. Vodiannikov as a judge of the Constitutional Court of Ukraine from the President's quota. This appointment allowed the Court to reach the minimum necessary quorum of 12 judges.

From July 2025, the Constitutional Court of Ukraine was once again able to hold sittings of the Grand Chamber and consider constitutional submissions, although its work remained challenging due to the minimum number of votes.

On 17.09.2025, the President of Ukraine signed Decree No. 687/2025, appointing Y. Barabash as a judge of the Constitutional Court of Ukraine. This appointment increased the number of judges to 13, strengthening the institutional stability of the Court.

Despite the availability of recommended candidates, the Verkhovna Rada (Parliament) of Ukraine failed to fill two vacancies during 2025, which remains the main obstacle to forming a full composition of the Constitutional Court. The Expert Advisory Group submitted lists of recommended candidates ²⁷to both Parliament and the President of Ukraine as early as February 2025; however, the Verkhovna Rada (Parliament) of Ukraine was unable to appoint any judges from its quota throughout the year.

On 14.10.2025, the Verkhovna Rada (Parliament) of Ukraine announced the commencement of a new competitive selection process for the two vacant positions of judge of the Constitutional Court.

The competitive selection process under the judges' congress quota in 2025 was accompanied by several decisions of the Council of Judges of Ukraine (CoJU) due to the inability to form a sufficient pool of candidates; however, the competition ultimately did not take place.

Despite the restoration of quorum, the Constitutional Court of Ukraine continues to operate with an incomplete composition. To ensure the stable functioning of the Court in 2026, it is critically important to fill the remaining vacancies, as the mandates of other current judges are also nearing expiration.

The assessment of the judicial system's state requires consideration of the activities of institutions that form the broader justice system and ensure its proper functioning. Among these, the prosecution service occupies a special place, as it performs key functions in ensuring the rule of law, protecting the interests of the state and society, and contributing to the implementation of the rule of law principle. Thus, the institutional capacity of the prosecution authorities is one of the key factors for the stability and efficiency of the legal system.

It is important to note that the effective functioning of prosecution authorities is impossible without professional, ethical, and stable personnel, as the prosecution service

²⁷ <https://ccu.gov.ua/storinka/dge-peredala-parlamentu-ta-prezydentovi-reytingovi-spysky-kandydativ-na-posady-suddiv-ksu>

is an integral part of the justice system. At the same time, the current state of prosecutor staffing in Ukraine is also characterized by a staffing crisis.

As of 01.01.2025, the total number of prosecutors in the prosecution authorities was 9,907, including 919 in the Office of the Prosecutor General (OGP); and 8,988 in regional, district, and specialized regional and district prosecution offices. The number of registered prosecutors as of 01.01.2025 was 9,058, including 961 in the OGP; and 8,097 in regional, district, and specialized regional and district prosecution offices.

As of 31.12.2025, the number of vacant and temporarily vacant prosecutor positions in Ukraine's prosecution authorities (excluding administrative positions) in the OGP, regional and equivalent prosecution offices stood at 386 ²⁸(of which 29 were temporarily vacant), and in district and equivalent prosecution offices at 954 (of which 193 were temporarily vacant).

As of 31.12.2025, 13.5% of positions in the prosecution authorities of Ukraine (excluding administrative positions) remain vacant.

One of the key tasks in 2025 was the completion and conduct of the competitive selection process for district prosecution offices, which is an important step in ensuring the stable operation of the prosecution service under martial law conditions.

In January 2025, the Qualification and Disciplinary Commission of Prosecutors (QDCP) approved the list of candidates who successfully passed the qualification exam as part of the selection for 62 positions of prosecutors in district prosecution offices, initiated in 2024.

As part of the selection process for 200 district prosecutor positions, launched in 2023, the Commission recognized 162 trainee prosecutors as having successfully completed special training and decided to submit recommendations to regional prosecutor offices for their appointment as prosecutors.

In June 2025, the selection process for 230 district prosecutor positions was launched and conducted, with special background checks for candidates still ongoing.

At the end of 2025, another selection process began for 121 district prosecutor positions. ²⁹The large number of applicants demonstrates trust in the Commission as an independent body ensuring the staffing capacity of the prosecution authorities.

7.1. Procedural Rights in Civil and Administrative Proceedings

Annually, the Commissioner receives notifications regarding violations of rights in civil and administrative proceedings, including the right of access to court, the right to have cases heard within a reasonable time, and the right to the enforcement of judicial

²⁸ <https://kdkp.gov.ua/news/declaration/685>

²⁹ <https://kdkp.gov.ua/news/declaration/688>

decisions. In 2022, 790 notifications were received on these issues, in 2023 – 516, and in 2024 – 863. Meanwhile, in 2025, the number of such notifications increased to 1,010, indicating a trend towards a growing number of cases of violations of citizens' constitutional rights in the field of administration of justice.

7.1.1. Right of Access to Court and the Right to Have a Case Heard within a Reasonable Time

The Law of Ukraine "On the Execution of Judgments and the Application of the Practice of the European Court of Human Rights" establishes the obligation for national courts to apply the European Convention on Human Rights and the case law of the ECtHR when considering cases.

One of the first ECtHR rulings affirming the indivisibility of the right of access to court as a component of the right to a fair trial guaranteed by Article 6 of the Convention is the ruling of 21.02.1975 in the case "Golder v. United Kingdom".³⁰

The right of access to court inherently requires regulation by the state, as stated in the ECtHR ruling of 19.06.2001 in the case "Kreuz v. Poland".³¹

Guided by Article 6 of the Convention, the ECtHR stresses the importance of ensuring each individual's right to have their case heard by a court within a reasonable time, as evidenced in the ruling of 13.07.1983 in the case "Zimmermann and Steiner v. Switzerland".³²

Following the enactment of the Law of Ukraine "On the Liquidation of the Kyiv District Administrative Court and the Establishment of the Kyiv City District Administrative Court" on 13.12.2022 (No. 2825-IX), the Commissioner continued to receive complaints regarding violations of the right to access justice and have cases heard within a reasonable time.

The annual reports on the state of human rights protection in Ukraine for 2023 and 2024 highlighted the negative consequences of the implementation of Law No. 2825-IX and the measures taken by the Commissioner within parliamentary oversight to reduce such violations.

During the proceedings initiated based on the complaint of citizen H. regarding the violation of the right to access justice and have a case heard within a reasonable time, the Commissioner submitted a recommendation to the Acting Head of the State Judicial Administration of Ukraine (SJAU) based on the facts uncovered.

³⁰ [https://hudoc.echr.coe.int/eng#{%22itemid%22:\[%22001-57496%22\]}](https://hudoc.echr.coe.int/eng#{%22itemid%22:[%22001-57496%22]})

³¹ https://zakon.rada.gov.ua/laws/show/980_030#Text

³² https://zakon.rada.gov.ua/laws/show/980_417#Text

As a result of the recommendation, an inspection was carried out, revealing 710 unresolved administrative cases that, under the Law of Ukraine of 16.07.2024 No. 3863-IX "On Amending Paragraph 2 of Section II 'Final and Transitional Provisions,'" and the Law of Ukraine "On the Liquidation of the Kyiv District Administrative Court and the Establishment of the Kyiv City District Administrative Court," should have been transferred to other district administrative courts of Ukraine through automated distribution among these courts. However, due to an error, they were not included in the list of cases for transfer.

In response to the Commissioner's recommendation, as a result of the actions taken, the case related to the complaint of the citizen was transferred to the designated judge for consideration, and a decision was made to initiate the automated distribution of the remaining 710 cases, thereby restoring the right to access justice for 287 individuals and 430 legal entities.

Another factor that significantly impacts the provision of the right to access to court and have a case heard within a reasonable time remains the acute shortage of judges.

The Commissioner received a complaint from citizen S., who reported an excessively prolonged judicial consideration of a case in which she is a party.

As a result of the inspection, it was determined that the cause of the violation of the reasonable time frame for the case consideration was the excessive workload on the judges of the Chudniv District Court of Zhytomyr region, due to the understaffing of the court. In this regard, the Commissioner appealed to the Chairman of the HCJ and the Chairman of the HQCJ of Ukraine to take urgent, comprehensive, and effective measures to address the excessive workload in the aforementioned court.

7.1.2. Right to the Enforcement of a Judicial Decision

The issue of ensuring the right to the enforcement of judicial decisions remains a pressing concern. In 2022, the Commissioner received 76 such reports, in 2023 – 449, in 2024 – 802, and by 2025, the number of such reports increased to 891.

In the context of martial law, new obstacles have emerged regarding the implementation of citizens' constitutional right to the enforcement of judicial decisions.

The most vulnerable categories include military personnel, who, while fulfilling their duty to defend the homeland, are limited in their ability to effectively exercise their right to the proper enforcement of judicial decisions made in their favor.

In 2025, the Commissioner initiated proceedings based on the complaint of citizen M., who is the wife of a serviceman.

A court decision found the inaction of the military unit commanders regarding the failure to consider citizen M.'s report about his dismissal from military service and the issuance of the corresponding order to be unlawful, as well as the obligation of the military unit commander to dismiss him from military service for family reasons.

As a result of the Commissioner's proceedings, citizen M. was discharged from military service by order of the military unit commander, removed from the unit's personnel list, and sent for registration with the territorial recruitment and social support centre.

7.1.3. Right to Legal Assistance

In 2025, the Commissioner received 35 reports regarding the violation of the right to legal assistance during the judicial consideration of civil and administrative cases. In previous years, similar complaints were also recorded: 39 reports in 2022, 62 in 2023, and 80 in 2024.

The ongoing state of martial law in Ukraine significantly impacts the ability of citizens to exercise their constitutional rights.

Currently, particular attention is being paid by the state to the protection of the constitutional rights of individuals deprived of their personal freedom as a result of the armed aggression against Ukraine.

Since 2022, the legal aid system has developed a mechanism for exercising the right to free legal assistance for individuals deprived of their personal freedom due to armed aggression against Ukraine.

Such individuals can receive representation services in courts and other state bodies, as well as the preparation of procedural documents during their deprivation of liberty and after their release, in relation to the protection of their rights and legitimate interests violated as a result of being deprived of personal freedom due to the armed aggression against Ukraine.

Free legal assistance can be sought not only by the individuals themselves after their release from captivity, but also by their family members while the individual is still detained.

However, there is currently a problem of insufficient public awareness regarding the available opportunities within the free legal aid system.

As a result, citizens seeking ways to protect the constitutional rights of individuals deprived of their personal freedom due to the armed aggression against Ukraine, approach, among others, the Commissioner, who, within the framework of parliamentary

control over the observance of human rights and freedoms, also takes optional measures aimed at encouraging the restoration of constitutional rights.

In 2025, the Commissioner initiated proceedings based on the complaint of citizen H., who is the wife of an individual deprived of his liberty as a result of the armed aggression against Ukraine.

Citizen H. required assistance in halting the enforcement actions in the enforcement proceedings, in which her husband, who is in captivity, is the debtor and thus unable to properly fulfil his obligations under a loan agreement. A court decision had been issued in favour of the bank, ordering the recovery of the debt under the loan agreement. The enforcement of the court decision was carried out compulsorily within the framework of the enforcement proceedings. All the efforts made by citizen H. to halt the enforcement actions were unsuccessful.

In response, the Commissioner, taking optional measures aimed at restoring the violated rights, provided the relevant state enforcement body with the information obtained during the proceedings, confirming the fact that citizen H.'s husband was deprived of his personal freedom as a result of the armed aggression against Ukraine. This information served as the basis for halting the enforcement actions within the enforcement proceedings.

Additionally, the data collected by the Commissioner was subsequently sent to the court for consideration during the review of the next claim filed by the bank against the individual held captive by the aggressor state.

As a result, the court rejected the bank's claim against the individual held in captivity by the aggressor state.

7.2. Procedural Rights in Criminal Proceedings

7.2.1. Failure to Comply with the Requirements of Article 214 of the Criminal Procedure Code (CPC) of Ukraine During the Consideration of Applications and Notifications about Criminal Offenses (Failure to Enter Information into the URPTI, Delayed Entry of Information into the Unified Register of Pre-trial Investigations (URPTI), Failure to Provide an Extract from the URPTI)

The results of monitoring the observance of rights during the consideration of applications and notifications about criminal offenses suggest that the inaction of individuals authorized to enter information into the URPTI and initiate investigations remains systemic. This is evidenced by the number of complaints to the Commissioner on these issues and judicial statistics.

Rights violations include not only the failure to enter information into the URPTI after the submission of an application or notification about a committed criminal offense, but also the failure to provide an extract from the URPTI to the applicant within 24 hours after the information is entered, which constitutes a failure to meet the requirements of Article 214 of the CPC of Ukraine.

In 2025, the Commissioner received 423 reports of violations of rights related to the failure to enter information into the URPTI based on applications or notifications about criminal offenses, which is an increase compared to 2024 (306), as well as 68 reports of failure to provide an extract from the URPTI, which also exceeds the 2024 figure (52).

Particular attention in the past year was drawn to instances of untimely and improper responses by pre-trial investigation bodies to applications and notifications about criminal offenses committed during mobilization activities, which were associated with the use of physical violence and arbitrariness.

It should be noted that at the stage of decision-making regarding the inclusion or non-inclusion URPTI based on applications or notifications about criminal offenses, prosecutorial oversight is not carried out. The current CPC of Ukraine provides for prosecutorial oversight over the compliance with laws by investigators and inquiry officers only at the stage of pre-trial investigation, which begins, according to part two of Article 214 of this Code, with the inclusion of information into the URPTI. The inaction of the pre-trial investigation body or prosecutor, which consists of the failure to enter information into the URPTI, can only be challenged by the applicant before an investigating judge.

The Secretariat of the Commissioner has addressed the pre-trial investigation bodies and the prosecutor's office regarding the exercise of their powers provided by Article 214 of the CPC of Ukraine during the consideration of applications and notifications about criminal offenses, specifically to the State Bureau of Investigation (SBI) and the prosecutor's office regarding complaints about the abuse of office by law enforcement officers and military personnel involved in notifying conscripted individuals about mobilization measures.

Following the intervention of the Commissioner's Secretariat, the pre-trial investigation bodies and the prosecutor's office entered information into the URPTI for 79 applications and notifications about committed criminal offenses in 2025.

Investigating judges reviewed 42,270 complaints ³³in 2025, compared to 36,334 ³⁴in 2024, 30,047 ³⁵in 2023, and 20,480 ³⁶in 2022, concerning the inaction of pre-trial investigation bodies in failing to enter information into the URPTI. In 2025, such

³³ https://court.gov.ua/inshe/sudova_statystyka/zvit_dsau_2025

³⁴ https://court.gov.ua/inshe/sudova_statystyka/zvit_dsau_2024

³⁵ https://court.gov.ua/inshe/sudova_statystyka/zvit_dsau_2023

³⁶ https://court.gov.ua/inshe/sudova_statystyka/zvit_dsau_2022

complaints accounted for 46.8% of all complaints regarding decisions, actions, and inactions during pre-trial investigations (90,271).

In 2025, investigating judges granted 25,066 complaints, which constitutes 59% of the total number of complaints reviewed. In 2024, 20,861 complaints (57.4%) were granted, in 2023 - 17,030 complaints (56.7%), and in 2022 - 12,005 complaints (58.6%) of the total number of complaints of this category.

The number of complaints granted by investigating judges regarding the inaction of the authorized bodies, specifically the failure to enter information into the URPTI, increased in 2025 compared to 2024 and 2022, indicating the systemic nature of the violations of human rights.

According to the information provided by the OGP of Ukraine in response to a request from the Commissioner's Secretariat, based on the operational data from the URPTI, in 2025, pre-trial investigation bodies and the prosecutor's office, following the rulings of investigating judges, initiated 12,438 criminal proceedings (in 2024 – 10,116). Of these proceedings, 4,567 (36.7%) were completed (in 2024 – 4,056 (40.1%)), including 127 (1%) cases sent to court (in 2024 - 130, 1.3%), and 4,440 (35.7%) cases were closed (in 2024 – 3,926, 38.8%).

The statistical data provided indicate the overload of pre-trial investigation bodies and the prosecutor's office with unfounded applications (notifications) regarding criminal offenses, as well as the burden on investigating judges with complaints about the failure to enter information into the URPTI.

The imperfection of the current legal regulation of the procedure for initiating a pre-trial investigation remains the cause of systemic human rights violations at this stage.

Meanwhile, the recommendations provided to the Ministry of Justice of Ukraine in the Annual Report on the State of Observance and Protection of Human Rights and Freedoms in Ukraine for 2024, regarding the development and submission for consideration by the KМУ (Government of Ukraine) of a draft law to improve the provisions of Article 214 of the CPC of Ukraine concerning the provision of legal certainty, have remained unimplemented.

7.2.2. The Right to Enforce the Decision of the Investigating Judge

In the Annual Report on the State of Observance and Protection of Human Rights and Freedoms in Ukraine for 2024, it was noted that the main reason for delays in the enforcement of investigating judges' decisions is the untimely sending of such court decisions for execution by some courts, as well as the lack of judicial oversight over their enforcement.

The implementation of the Electronic Court subsystem in the judicial information and telecommunications system has improved the mechanism for referring investigating judges' decisions for execution.

An unresolved issue remains the absence of control over the enforcement of investigating judges' decisions in local courts, particularly those decisions in which, as a result of reviewing complaints about inaction related to the failure to enter information into the URPTI after receiving a report of a criminal offense, the pre-trial investigation body or prosecutor was ordered to enter information into the URPTI, initiate an investigation, and provide the applicant with an extract from the URPTI within 24 hours of the entry of such information. Overall, this concerns ensuring the enforcement of the constitutional norm of Article 129-1, which places the responsibility for overseeing the enforcement of court decisions on the judiciary.

During the review of individual complaints submitted to the Commissioner in 2025 regarding the non-enforcement of investigating judges' decisions, inquiries were sent to both the courts and the bodies authorized to act on these judicial decisions. For example, some decisions required pre-trial investigation bodies to enter information into the URPTI based on a submitted application. As a result of monitoring the review of such complaints, it was found that in no case had the investigating judge been informed after the enforcement of the decision. At the same time, only a few investigating judges specify in their rulings the necessity for investigators and prosecutors to inform the investigating judge about the enforcement of these decisions.

7.2.3. The Right to Conduct Pre-Trial Investigation within Reasonable Time

Observance of reasonable time limits is one of the fundamental principles of criminal proceedings, as enshrined in the provisions of the CPC of Ukraine (part one of Article 21, part five of Article 28), which correspond to the requirements of Article 6 of the Convention that guarantee every individual the right to a fair trial and resolution of the case within a reasonable time by an independent and impartial tribunal established by law. In this regard, every person has the right to have the charges brought against them either subjected to judicial review in the shortest possible time or for the criminal proceedings against them to be terminated (part five of Article 28 of the CPC of Ukraine).

According to the case law of the ECtHR regarding the rules for calculating and determining the criteria of reasonable time, the duration of time limits is generally calculated from the moment the individual is informed of the suspicion³⁷, or from the moment the person is detained on suspicion of committing a criminal offense. In cases

³⁷ https://zakon.rada.gov.ua/laws/show/980_214#Text

where there is significant impact on the status of the suspect, the time limits may be calculated from earlier stages of the criminal proceedings³⁸.

In accordance with part two of Article 28 of the CPC of Ukraine, the prosecutor or the investigating judge (in terms of the time limits for resolving issues within their competence) ensures that the pre-trial investigation is conducted within a reasonable time.

The monitoring of compliance with procedural rights during pre-trial investigation is carried out through oversight in accordance with paragraph 3 of part three of Article 17 of the Law of Ukraine "On the Ukrainian Parliament Commissioner for Human Rights", which involves reviewing individual and collective complaints by prosecutors, who are entrusted by the laws of Ukraine to oversee the adherence to the law during the pre-trial investigation and to provide procedural guidance during the investigation, as well as by the heads of pre-trial investigation bodies, who are authorized under Article 39 of the CPC of Ukraine to organize the pre-trial investigation and take measures to eliminate violations of legislative requirements.

In 2025, the Secretariat of the Commissioner sent 478 letters to various levels of prosecution authorities regarding checks on complaints about the excessive duration and inefficiency of pre-trial investigations.

As a result of these checks, the validity of 142 complaints regarding violations of the rights and requirements of the CPC of Ukraine by investigators and interrogators during pre-trial investigations was confirmed. In response, prosecutors initiated the removal of investigators, conducted internal investigations, and held investigators disciplinarily accountable based on 42 complaints.

It has been established that investigators fail to timely perform necessary investigative (search) and procedural actions, leave motions from participants in the criminal proceedings unresolved, and do not fully comply with written instructions provided by prosecutors who supervise the investigation, as well as with the rulings of investigating judges issued in response to complaints about decisions, actions, or omissions of pre-trial investigation bodies, which mandate specific actions at the investigation stage (such as reviewing motions, etc.).

Due to delays in the pre-trial investigation, cases referred to court are closed, which undermines the objectives of the criminal proceedings, particularly with respect to protecting the victim and society as a whole. This is unacceptable from the standpoint of public interest and the rights of the victim.

Additionally, according to information from the OGP in response to a request from the Commissioner's Secretariat, as of 30.09.2025, it was found that more than 68,000 criminal case materials had been lost in cases that had not yet resulted in the submission of an indictment to the court, a petition for the application of compulsory medical or educational measures, or the release of an individual from criminal liability. These figures

³⁸ https://zakon.rada.gov.ua/laws/show/974_c94#Text

are constantly changing due to objective reasons, such as de-occupation of territories, conducting inventories, etc. (as of 30.09.2024, the loss of 76,376 materials in cases of this category was recorded). Over the course of 9 months in 2025, prosecutors and investigators, in agreement with prosecutors, submitted over 7.7 thousand petitions to the court for the restoration of lost materials. As a result of the courts' consideration, more than 8,000 petitions were granted (including those from previous years).

Among the appeals received by the Commissioner in 2025, special attention should be given to complaints regarding the excessive duration of pre-trial investigations in criminal cases that were initiated in accordance with the CPC of Ukraine of 1960.

With the adoption of the 2012 CPC of Ukraine, the institution of additional investigation was abolished. However, criminal cases that were submitted to the court by prosecutors before the entry into force of this Code continued to be reviewed by the courts of first instance, appellate, and cassation courts according to the procedures that were in place before the new Code came into effect (Paragraph 11 of Section XI "Transitional Provisions" of the CPC of Ukraine). In cases where such criminal cases were returned by the court to the prosecutor for additional investigation, it was conducted according to the procedure established by the 2012 version of the CPC, i.e., from the moment the information was entered into the URPTI.

At the same time, in 2025, cases were identified in the Donetsk, Kyiv, and Cherkasy regions where information was not entered into the URPTI based on materials from criminal cases returned by the courts for additional investigation, and even the loss of such cases.

This state of pre-trial investigation not only contradicts the requirements of criminal procedural legislation but also infringes on the procedural rights and guarantees of participants in criminal proceedings. It constitutes a violation of rights guaranteed by Article 6 of the Convention, in light of the case law of the ECtHR³⁹. According to the ECtHR's case law, a person accused of a crime should not remain in a state of uncertainty regarding their fate for an extended period.

In August 2025, the Commissioner received a complaint from citizen B. regarding the inaction of the pre-trial investigation authorities and the failure to adopt a final decision in his criminal case for over 25 years. The materials of the case were sent to the district prosecutor for additional investigation based on the ruling of the district court dated 28.03.2001.

The Representative (Deputy) of the Commissioner addressed the regional prosecutor regarding the organization of a verification. The results confirmed the validity of B.'s complaint and revealed that the pre-trial investigation authority,

³⁹ https://zakon.rada.gov.ua/laws/show/974_136#Text

contrary to the requirements of Paragraphs 10-12 of Section XI "Transitional Provisions" of the CPC of Ukraine, had not entered information into the URPTI in execution of the district court ruling from 28.03.2001, and had not conducted a pre-trial investigation with the aim of making a lawful decision.

On 12.09.2025, the Prosecutor's Office entered information into the URPTI and registered a criminal proceeding for an offense under Part 5 of Article 185 of the Criminal Code of Ukraine. The materials of the case were found in the archives of the Ministry of Internal Affairs of Ukraine.

On 30.09.2025, in the criminal proceeding, B. and two other individuals were notified of suspicion of committing a criminal offense under Part 5 of Article 185 of the Criminal Code of Ukraine. The case was then sent to the district court with a petition to release these individuals from criminal liability due to the expiration of the statute of limitations.

Following the conducted internal investigation, the violations of criminal procedural law were confirmed. It was established that the head and deputy head of the investigative department of the district police department had committed a disciplinary offense and were subject to disciplinary action.

In criminal cases initiated under the norms of the 1960 CPC of Ukraine, during the investigation, property arrest was applied in the manner established by this Code, for the purpose of securing civil claims or property confiscation, along with preventive measures, which continue in effect until they are changed, revoked, or terminated in the manner that was in force before the 2012 version of the CPC came into effect.

Excessive duration of criminal proceedings, the inaction of the pre-trial investigation authorities, combined with procedural limitations of human rights, effectively create a state of legal uncertainty.

During the Commissioner's proceedings on the complaint of citizen Ch., it was established that a preventive measure in the form of a written undertaking not to leave was applied to the complainant for over 20 years, starting in 2005 in a criminal case. In April 2008, the court returned the criminal case to the local prosecutor's office of the Donetsk region for additional investigation. However, the investigation was never actually initiated, and the preventive measure continued to be in force, thereby restricting the right to free movement. The Commissioner appealed to the Prosecutor General for a review of the legality of such a restriction and adherence to reasonable time limits for the pre-trial investigation. It was important to restore the proper legal procedure and verify whether there were grounds for limiting the individual's right to freedom of movement.

As a result of the review, in September 2025, information about criminal offenses committed in 2004 against property was entered into the URPTI, a decision was made to cancel the preventive measure in the form of a written undertaking not to leave for the complainant, and a separate investigation was opened into the case of official negligence to determine the circumstances of the loss of the criminal case materials.

The right to freedom of movement was restored after 20 years of restrictions.

7.2.4. Right to Effective Pre-Trial Investigation

The effectiveness of a pre-trial investigation is assessed based on various criteria. The ECtHR has highlighted minimum criteria for an effective pre-trial investigation⁴⁰: speed, thoroughness, independence, and objectivity. The investigation must be independent, impartial, and subject to public oversight, with competent authorities acting with exemplary diligence and efficiency. For an investigation to be considered effective⁴¹, it must lead to the identification and punishment of those responsible. While achieving a result is not obligatory, taking the necessary steps is.

Despite the conditions of martial law, the requirements for an effective pre-trial investigation remain crucial, particularly in terms of ensuring the rights, freedoms, and legitimate interests of participants in criminal proceedings and achieving the aims of the investigation, as outlined in Article 2 of the CPC of Ukraine.

In 2025, the Commissioner received 580 reports of ineffective pre-trial investigations, which is a decrease compared to 649 in 2024 and 714 in 2023, but an increase from 413 in 2022. Among these were complaints regarding the unjustified and illegal closure of criminal proceedings, failure to inform individuals defined by law about the results of pre-trial investigations, and the failure to send a copy of the decision to the applicant or victim regarding the adopted procedural decision.

It should be noted that the provisions of the CPC of Ukraine regarding the mandatory delivery of a copy of the investigator's or inquiry officer's decision to close a criminal case to the applicant, victim, and prosecutor are imperative (obligatory). The violations identified in this area directly affect the protection of the rights and freedoms of individuals, guaranteed by Article 55 of the Constitution of Ukraine, as well as the norms of the CPC of Ukraine, allowing individuals to defend their rights and freedoms from violations and unlawful encroachments by any means not prohibited by law, including appealing to the court's decisions, actions, or omissions of state authorities, local self-government bodies, and officials.

⁴⁰ https://zakon.rada.gov.ua/laws/show/974_b26#Text

⁴¹ https://zakon.rada.gov.ua/laws/show/974_e08#Text

During the inspections carried out by the prosecution authorities based on the requests sent by the Commissioner's Secretariat, 35 decisions to close criminal proceedings were overturned, and 13 applicants were provided with copies of the decisions to close the proceedings, enabling them to exercise their right to appeal the decisions.

In 2025, investigative judges considered 6,249 complaints about the decisions of investigators to close criminal proceedings. Of these, 3,524 were satisfied, representing 56% of the total. For comparison, in 2024, 6,866 complaints were reviewed, with 4,077 being satisfied (59.4%). In 2023, 8,086 complaints were reviewed, with 4,849 satisfied (59.9%), and in 2022, 7,285 complaints were reviewed, with 4,364 satisfied (59.9%).

Year	Y	Number of complaints considered regarding the investigator's decision to close criminal proceedings, number of cases,	Of them		
		total	Returned	Accepted	Denied
2022	2	7,285	869	4,364	1,111
2023	2	8,086	980	4,849	1,199
2024	2	6,866	768	4,077	1,088
2025	2	6,249	753	3,524	1,190

As a result of monitoring the review of appeals and the monitoring of complaints by investigating judges, a negative trend is observed in the premature and unlawful decisions made by pre-trial investigation bodies to close criminal proceedings, without comprehensive, complete, and impartial examination of the circumstances of the criminal case.

In May 2025, the mother of a five-year-old girl contacted the Secretariat of the Commissioner with a complaint about the ineffective conduct of the pre-trial

investigation by the investigators regarding the father's failure to pay child support for his daughter, which had been ongoing since her birth, resulting in a debt exceeding 120,000 UAH.

The Representative (Deputy) of the Commissioner approached the Head of the Regional Prosecutor's Office, requesting a review of the legality of the decision by the pre-trial investigation body to close the criminal case and to take appropriate measures to restore the rights and interests of the child. Following a review of the pre-trial investigation materials, on 10.06.2025, the prosecutor annulled the decision to close the case as unlawful and unfounded, and the status of the investigation and procedural oversight was discussed at an operational meeting. The prosecutor issued written instructions to the investigator regarding the necessary investigative (search) actions.

Taking into account the gathered evidence, on June 27, 2025, the child's father was formally notified of his suspicion of committing a criminal offense under Part 1 of Article 164 of the Criminal Code of Ukraine, the indictment was approved, and the case was referred to court for consideration.

7.2.5. Right to Peaceful Possession of Property When Applying Measures to Ensure Criminal Proceedings

According to paragraph 7 of part 2 of Article 131 of the CPC of Ukraine, the seizure of property is one of the measures to ensure criminal proceedings.

As a result of monitoring the handling of complaints, information was received about cases where this measure, applied for several years, remained in effect in cases where, after the property was seized and an arrest was placed on it, no person was notified of suspicion. This renders the owners' expectations for the authority to make a final decision regarding their property meaningless due to the lack of any prospects for the restoration of their rights.

According to the case law of the ECtHR⁴², any intervention by a state body into the right to peaceful possession of property must ensure a "fair balance" between the individual's right to property and public interests. This necessary balance cannot be achieved if an individual is burdened with an excessive and disproportionate burden.

According to paragraph 4 of part 1 of Article 169 of the CPC of Ukraine, temporarily seized property must be returned to the person from whom it was seized, including in cases where the arrest of the property is lifted.

As per the provisions of Articles 173 and 174 of the CPC of Ukraine, during the pre-trial investigation, the issue of imposing a property arrest is decided by the

⁴² https://zakon.rada.gov.ua/laws/show/980_098#Text

investigating judge. Part 3 of Article 174 of the CPC of Ukraine establishes the prosecutor's obligation to simultaneously cancel the property arrest when a decision to close the criminal proceeding is made, provided that the property is not subject to special confiscation.

Furthermore, part four of Article 132 of the CPC of Ukraine specifies that the ruling of the investigating judge or court on the application of measures to ensure criminal proceedings ceases to have effect upon the expiration of its term, the lifting of the preventive measure, the issuance of an acquittal verdict, or the closure of the criminal case, in the manner prescribed by the CPC of Ukraine.

In cases where a criminal proceeding is closed following the pre-trial investigation, measures to ensure the criminal proceeding, including the property arrest, cease to be effective based on part 4 of Article 132 of the CPC of Ukraine.

Monitoring compliance with rights related to the application of measures to ensure criminal proceedings shows that there are frequent instances where the fate of seized property is overlooked by prosecutors or investigators when making decisions to close criminal proceedings following a pre-trial investigation.

During the investigation of the complaint submitted by citizen P., it was established that the prosecutor had issued a decision to close the criminal proceedings back in December 2015. However, no decision was made to lift the property seizure imposed in 2012 under the investigator's ruling.

In response to a request from the Commissioner's Secretariat, the state body responsible for the registration of property rights and encumbrances reported that it was only in May 2025, based on a court ruling, that the arrest on the applicant's real estate property was lifted.

Additionally, due to the inconsistency in the legislation, the prosecutor's or investigator's decision to close the criminal proceedings is not always a legal basis for lifting the seizure of property.

For instance, Article 59 of the Law of Ukraine "On Banks and Banking Activities" dated 07.12.2000, No. 2121-III stipulates that the removal of a property or funds seizure must be done by the decision of a state or private executor, or by a court ruling.

Even if a decision on closing the criminal proceedings includes a prosecutor's decision to lift the property seizure, it does not constitute a legal basis for payment service providers (banking institutions) to lift the seizure of funds in accounts.

The only effective legal remedy in such cases is to appeal to the investigating judge, which imposes an additional burden on the property owners.

It should be noted that according to the provisions of Article 174 of the CPC of Ukraine, a property seizure can be fully or partially lifted by the investigating judge

during the pre-trial investigation. However, it is not provided that the investigating judge can lift the property seizure after the conclusion of the pre-trial investigation in the form of closing the criminal proceedings.

On the other hand, judicial practice⁴³, referring to the general principles of criminal proceedings, which include: the rule of law, legality, and the right to appeal procedural decisions, actions, or inactions, creates a precedent for resolving these cases in order to protect against arbitrary restrictions on property rights or ownership.

At the same time, even after a court ruling is made in favour of the property owner, the expectation of the restoration of the right to peaceful possession of property does not end due to the lack of judicial control over the enforcement of rulings, particularly regarding the lifting of the property seizure.

Therefore, it is essential to establish effective control over decisions regarding seized property when criminal proceedings are closed, to ensure the enforcement of investigating judges' rulings, and to improve the legislation regulating the procedure for lifting property seizures.

In June 2025, a complaint was submitted to the Commissioner by the widow of a Ukrainian Armed Forces serviceman, Mrs. P., regarding the refusal of a financial institution to lift the seizure on her funds, specifically a one-time financial aid provided due to her husband's death. It was found that in May 2025, the investigator sent a resolution about the closure of the criminal case, which was received by the payment service provider. The seizure of the funds in question had been imposed by a ruling from an investigating judge in September 2024, which prohibited the disposal and transfer of money on the bank account. The bank refused to lift the seizure on the funds based on the investigator's resolution.

Mrs. P. submitted a request to the investigating judge for the cancellation of the seizure. On 11.07.2025, the judge granted the request, lifting the seizure on the amount of 15,000,000 (fifteen million) UAH, and the seizure was removed from the funds in August 2025.

7.2.6. Rights of Detainees During the Adoption of Procedural Decisions on the Application of Security Measures

A negative practice continues regarding suspects (defendants) held in custody, as well as persons sentenced to imprisonment who also have the status of suspects (defendants) in another criminal case. These individuals are subjected to security measures, such as being transferred from a remand centre to temporary detention centers

⁴³ <https://reyestr.court.gov.ua/Review/118558563>

for an indefinite period, which does not comply with international standards and recommendations, particularly in preventing ill-treatment and torture. This issue was emphasized in the Annual Report on the Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2024, and it was recommended that this matter be legally regulated in accordance with international legal norms and standards for the treatment of detainees.

The Parliament attempted to address this issue in the Law of Ukraine dated 16.04.2025, No. 4359-IX, "On Amendments to Article 196 of the Criminal Procedure Code of Ukraine and Certain Laws of Ukraine Regarding the Improvement of the Procedure for Ensuring Security Measures for Persons Participating in Criminal Proceedings". This law amended the Law of Ukraine No. 580-VIII dated 02.07.2015, "On the National Police", excluding from point 38 of part 1 of Article 23 the provision that the police, in accordance with its tasks and as provided by law, holds persons who are subject to detention as a preventive measure, as well as accused and convicted persons, in temporary detention centres.

On 07.05.2025, this Law was returned with proposals from the President of Ukraine. As of now, Ukrainian legislation on these matters has not been aligned with international standards.

7.2.7. Right to a Court Hearing of Criminal Proceedings within a Reasonable Time

In violation of the rights guaranteed by Article 6 of the Convention, 165 reports were received in 2025 regarding excessively prolonged court hearings of criminal proceedings.

To monitor the adherence to procedural rights of participants in criminal proceedings and international human rights standards, in 2025, staff from the Commissioner's Secretariat attended 309 court hearings, including 35 monitoring observations of court proceedings conducted via videoconference. The monitoring covered court hearings of all levels of jurisdiction and, by the Commissioner's instructions, was conducted in courts located in 18 regions of Ukraine, including:

Region	Number of Monitoring Observations in Court Hearings
Kyiv City and Kyiv region	91
Vinnitsia region	5
Volyn region	2
Dnipropetrovsk region	6
Zhytomyr region	9

Zakarpattia region	2
Zaporizhzhia region	4
Ivano-Frankivsk region	12
Kirovohrad region	9
Lviv region	5
Mykolaiv region	1
Odesa region	96
Poltava region	8
Rivne region	4
Kharkiv region	8
Kherson region	7
Khmelnytskyi region	13
Chernihiv region	27

During the review of submissions from courts, reference information on case progress was requested in order to identify the causes of delays in judicial proceedings. According to the information obtained, the reasons include: shortage of judicial staff, postponement of hearings due to the absence of participants, and loss of materials of criminal proceedings at the trial stage.

The results of monitoring compliance with procedural rights during court proceedings, as well as the number and content of complaints regarding delays in the consideration of criminal cases, allow for the conclusion that long-standing issues related to delays in the administration of justice remain unresolved.

A high number of judicial vacancies leads to long intervals in scheduling cases in courts. As a result of excessive workload, judges consider cases over extended periods of time.

Due to the lack of an effective legal remedy, individuals whose rights are violated as a result of non-compliance with reasonable time requirements in criminal proceedings file complaints with the ECtHR.

According to information published on the official website of the ECtHR, in 2025 alone the Court delivered 43 judgments against Ukraine, in which, inter alia, it found a violation of Article 6 (1) of the Convention due to the excessive length of criminal proceedings and awarded compensation in the total amount of 613,036.00 EUR.

7.3. Human Rights and Constitutional Proceedings

Cooperation between the Commissioner and the Constitutional Court of Ukraine (CCU) plays an important role in the system of guarantees for the protection of constitutional rights and freedoms of individuals and citizens. Such cooperation becomes

particularly significant in conditions of social tension, transformations of legal regulation, and challenges caused by martial law and political processes.

The Commissioner plays a system-forming role in the mechanism of constitutional justice, ensuring an institutional link between the need to protect human rights and the activities of the constitutional review body.

In this context, the Commissioner's activities in the field of constitutional justice in 2025 were focused on the following main areas:

7.3.1. Submission to the CCU of constitutional petitions regarding the determination of the conformity with the Constitution of Ukraine (constitutionality) of laws of Ukraine or other regulatory legal acts of the Verkhovna Rada (Parliament) of Ukraine, acts of the President of Ukraine and the Cabinet of Ministers of Ukraine, as well as regulatory legal acts of the Autonomous Republic of Crimea; and the official interpretation of the Constitution of Ukraine.

On 30.12.2025, the Commissioner submitted a constitutional petition to the CCU requesting the declaration as unconstitutional of the provisions of paragraph 22 of item 10-2 of Section XIII "Final and Transitional Provisions" of the Law of Ukraine "On Enforcement Proceedings" dated 02.06.2016, No. 1404-VIII.

The challenged provision provides for the suspension of enforcement actions in open enforcement proceedings during the period of martial law in cases where debtors are enterprises of the defence-industrial complex defined in accordance with the procedure established by the Cabinet of Ministers of Ukraine, military command bodies, units, military units, higher military educational institutions, military training units of higher education institutions, and institutions and organizations that are part of the Armed Forces of Ukraine.

The constitutional petition emphasizes that the established moratorium makes it impossible to enforce court decisions of a non-pecuniary nature (obligations to perform certain actions). The Commissioner draws attention to the fact that enforcement of such decisions is particularly relevant during martial law, while their postponement until its termination undermines the right to judicial protection.

In particular, the moratorium blocks the enforcement of decisions requiring: (Regional) Territorial Recruitment and Social Support Centres ((R)TCR and SS) to make changes to the Unified State Register of conscripts, persons liable for military service, and reservists (for example, regarding removal from military registration); military units to consider a serviceman's report or decide on his dismissal from military service.

Special emphasis is placed on the blocking of decisions subject to immediate enforcement, including reinstatement in public service and reinstatement of unlawfully dismissed employees (as provided for by the Code of Administrative Procedure of Ukraine and the Civil Procedure Code of Ukraine). In such cases, the moratorium not

only violates the right to judicial protection (Article 55 of the Constitution of Ukraine), but also indirectly affects the right to work and to receive remuneration, reducing protection against unlawful dismissal to a formality.

The Commissioner emphasized that the legal position set out in the constitutional petition has a universal character and applies to any non-pecuniary court decisions where the debtor is one of the above-mentioned entities. The challenged moratorium violates Articles 8, 22(3), 55(1–2), 64, 129(2)(9), and 129-1 of the Constitution of Ukraine, creating a situation of continuous violation of human rights.

On 13.01.2026, the Third Panel of Judges of the Second Senate of the Constitutional Court of Ukraine issued a ruling opening constitutional proceedings in the case upon the Commissioner's petition.

The text of the constitutional petition is available on the official website of the CCU or on the official website of the Commissioner.

7.3.2. Expression of the Position of the Commissioner in Constitutional Complaints and Constitutional Petitions Pending before the CCU

During 2025, the Commissioner prepared and submitted to the CCU two legal opinions in the form of *amicus curiae* in the following constitutional proceedings:

- in a constitutional complaint regarding the conformity with the Constitution of Ukraine (constitutionality) of certain provisions of paragraph 1 of part 1 of Article 2 of the Law of Ukraine “On Compensation for Damage and Destruction of Certain Categories of Real Estate as a Result of Hostilities, Terrorist Acts, Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine, and the State Register of Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine” dated 23.02.2023 No. 2923-IX;
- in a constitutional petition of the Supreme Court regarding the conformity with the Constitution of Ukraine (constitutionality) of a specific provision of paragraph 10 of part 1 of Article 212 of the Family Code of Ukraine, namely the words “public order and morality”.

The constitutional proceedings are currently ongoing.

In addition, the Constitutional Court of Ukraine, within the framework of consideration of one of the constitutional complaints, involved the Commissioner in its examination.

7.3.3. Submission by the Commissioner of Proposals for Improving the Legislation of Ukraine in the Field of Protection of Human Rights and Freedoms in Implementation of CCU Decisions

By Decision of the Constitutional Court of Ukraine (CCU) dated 20.01.2025 No. 2-r(II)/2025 in the case concerning the constitutional complaint regarding the compliance of subparagraph 7 of paragraph 1 of part 2 of Article 4 and part 1 of Article 8 of the Law of Ukraine “On Court Fees” of 08.07.2011 No. 3674-VI with the Constitution of Ukraine, a separate provision of the Law of Ukraine “On Court Fees”, which restricted a person’s access to the Supreme Court as a court of cassation in civil cases, was declared unconstitutional.

The separate provision of the Law of Ukraine “On Court Fees” of 08.07.2011 No. 3674-VI ceased to be valid six months after the date of adoption of the relevant CCU Decision.

With a view to developing an effective draft law, following a letter from the Committee of the Verkhovna Rada (Parliament) of Ukraine on Legal Policy, and involving the academic community of Taras Shevchenko National University of Kyiv and Yaroslav Mudryi National Law University, on 28.02.2025 the Commissioner submitted substantiated proposals regarding the wording of the relevant provisions of the draft law. These proposals were not limited solely to cassation proceedings, but also addressed other issues of court fees requiring legislative regulation.

On 18.04.2025, a draft law “On Amendments to Certain Legislative Acts of Ukraine Regarding the Improvement of the Procedure for the Distribution of Court Costs and Court Fees” was registered in the Verkhovna Rada (Parliament) of Ukraine. On 18.06.2025, the law was adopted, and on 16.07.2025 it entered into force.

7.4. Human Rights and the European Court of Human Rights

The Secretariat of the Ukrainian Parliament Commissioner for Human Rights maintains ongoing communication and provides expert support within the framework of interstate cases of Ukraine v. Russia. In particular, this concerns issues related to violations by the Russian Federation of international humanitarian law requirements regarding Ukrainian prisoners of war, civilian populations, and children.

A landmark development was the judgment delivered on 09.07.2025 by the Grand Chamber of the ECtHR in the interstate case “Ukraine and the Netherlands v. Russia” (applications No. 8019/16, 43800/14, 28525/20, and 11055/22), in which almost all of Ukraine’s complaints against the Russian Federation were upheld.

The ECtHR found that the events in Ukraine are unprecedented in the history of the Council of Europe. The nature and scale of the violence, as well as the hostile statements concerning Ukraine’s statehood, independence, and even its very right to exist, pose a threat to peaceful coexistence in Europe. These actions are aimed at undermining

the very foundations of democracy on which the Council of Europe and its member states are based, through the destruction of individual freedoms, suppression of political freedoms, and blatant disregard for the rule of law.

The ECtHR placed particular emphasis on the issue of abduction and unlawful transfer of Ukrainian children. In its findings, the Court referred to evidence confirming the systematic nature of these violations. In particular, the ECtHR took into account data presented by the Commissioner in the Special Report “UNBLOOMED. Violation of the Rights of Ukrainian Children in the Temporarily Occupied Territories of Ukraine and in Russia: Deportation, Militarization, Indoctrination” (2023). The Court also considered public comments and statements made by the Commissioner in the media and on international platforms.

RECOMMENDATIONS:

To the State Bureau of Investigation:

to ensure oversight over compliance with the requirements of part 4 of Article 535 of the Criminal Procedure Code of Ukraine, according to which bodies and persons executing a court decision must inform the court that issued the decision about its execution.

To the National Police of Ukraine:

to ensure oversight over compliance with the requirements of part 4 of Article 535 of the Criminal Procedure Code of Ukraine, according to which bodies and persons executing a court decision must inform the court that issued the decision about its execution.

To the Security Service of Ukraine

to ensure oversight over compliance with the requirements of part 4 of Article 535 of the Criminal Procedure Code of Ukraine, according to which bodies and persons executing a court decision must inform the court that issued the decision about its execution.

To the Heads of Local General Courts:

to ensure systematic verification (monitoring) of compliance with legal requirements in courts regarding the timely initiation of enforcement of investigating judges' rulings.

To the Office of the Prosecutor General:

to organize inspections regarding the timeliness of entering information into the URPTI in criminal case materials reviewed by courts under the procedure in force prior to the entry into force of the Criminal Procedure Code of Ukraine as amended on 13.04.2012 No. 4651-VI, which were returned to prosecutors for additional investigation, as well as the existence of grounds for restricting rights in connection with the application of decisions in these cases concerning preventive measures, seizure of property, and suspension from office, applied during inquiry and pre-trial investigation before the entry into force of this Code; ensure oversight over compliance with the requirements of part 4 of Article 535 of the Criminal Procedure Code of Ukraine, according to which bodies and persons executing a court decision must inform the court that issued the decision about its execution.

To the Ministry of Justice of Ukraine:

to analyse inconsistencies between current provisions of the Criminal Code of Ukraine and other regulatory acts governing the lifting of seizure from movable and immovable property, prepare proposals for improving legislation, and submit them in the established procedure to the Cabinet of Ministers of Ukraine;

to develop and submit to the Cabinet of Ministers of Ukraine a draft law amending Article 41 of the Law of Ukraine “On Enforcement Proceedings” of 02.06.2016 No. 1404-VIII, providing for the introduction of a mechanism for reinstating enforcement proceedings, except through out-of-court procedures;

to develop and submit to the Cabinet of Ministers of Ukraine a draft law amending the paragraph 3 of part 3 of Article 63 of the Law of Ukraine “On Enforcement Proceedings” of 02.06.2016 No. 1404-VIII, clarifying the obligation of the enforcement officer to issue a decision to terminate enforcement proceedings following the submission of a report to a pre-trial investigation body about a criminal offense committed by the debtor, after receiving confirmation that relevant information has been entered into the Unified Register of Pre-Trial Investigations.

8. INFORMATION RIGHTS

Number of appeals	15, 217
Number of monitoring visits and inspections:	481
on-site monitoring visits	1
off-site inspections	382
inspections in the field of personal data protection	98

Number of restored rights	2,9 28
Number of proceedings	2,5 17
Submissions by the Commissioner	5
Orders to eliminate violations in the field of personal data protection	75
Protocols on administrative offences under Articles 188-40 and 212-3 of the CoAO of Ukraine submitted to local courts for consideration:	32
Article 188-40 of the CoAO of Ukraine	16
Article 212-3 of the CoAO of Ukraine	16
Number of reviewed draft regulatory legal acts	331
Number of recommendations on ensuring information rights	1,9 34
Number of recommendations on the practical application of personal data protection legislation	716

8.1. Protection of Personal Data

The field of personal data protection covers almost all areas of social relations. It combines supervisory functions, response mechanisms, explanatory and awareness-raising activities aimed at preventing violations, and is directly linked to the protection of the human right to privacy.

Article 8 of the Convention for the Protection of Human Rights and Fundamental Freedoms guarantees everyone the right to respect for his or her private and family life, home, and correspondence. The provisions of this Article stipulate that public authorities and local self-government bodies, as well as their officials and servants, have limited ability to interfere with the exercise of this right. Public authorities may not interfere with the exercise of this right except in cases where such interference is carried out in accordance with the law and is necessary in a democratic society in the interests of national security, public safety or the economic well-being of the country, for the prevention of disorder or crime, for the protection of health or morals, or for the protection of the rights and freedoms of others.

In Ukraine, this right is also enshrined in the Constitution of Ukraine, in particular in Article 32, which establishes guarantees of the inviolability of a person's private and family life. This Article provides that no one shall be subject to interference in his or her personal and family life, except in cases provided for by the Constitution of Ukraine. The

collection, storage, use, and dissemination of confidential information about a person without their consent is not permitted, except in cases defined by law and only in the interests of national security, economic well-being, and human rights.

Article 32 of the Constitution of Ukraine also emphasizes that every citizen has the right to access information about themselves held by public authorities, local self-government bodies, institutions, and organizations, provided that such information is not state or other legally protected secret.

The Law of Ukraine “On Personal Data Protection” regulates legal relations related to the protection and processing of personal data. It is aimed at safeguarding fundamental human and civil rights and freedoms, in particular the right to privacy in connection with the processing of personal data, and establishes the legal basis for the control over personal data processing in Ukraine.

The rapid development of information technologies in the European Union led to the adoption of new data protection legislation in 2016, in order to adapt personal data protection regulation to the new era of digital technologies. As a result, Regulation (EU) 2016/679 of the European Parliament and of the Council of 27.04.2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EU (General Data Protection Regulation (GDPR)) was adopted.

Digitalisation has also encouraged Ukraine to actively work on adapting its national legislation in the field of personal data protection in line with European Union standards, in particular the GDPR and the Modernised Convention 108.

In order to implement reforms in the field of personal data protection, it is necessary to adopt the draft laws “On Personal Data Protection” (registration No. 8153) and “On the National Commission for Personal Data Protection and Access to Public Information” (registration No. 6177). The adoption of these draft laws is an important step towards Ukraine’s integration into the EU.

Today, independent parliamentary oversight over compliance with personal data protection legislation is carried out by the Commissioner, who is empowered, in particular, to consider citizens’ complaints regarding the processing of their personal data, conduct inspections, issue binding orders (prescriptions), provide recommendations, and carry out awareness-raising activities aimed at preventing violations of human rights.

The Commissioner includes in the annual report on the state of observance and protection of human rights and freedoms in Ukraine a section on the state of compliance with legislation in the field of personal data protection.

8.1.1. Key Violations in the Field of Personal Data Protection

In the course of exercising the Commissioner's powers of parliamentary oversight over compliance with personal data protection legislation in 2025, **2,109** appeals were received, containing **2,262** reports from individuals and legal entities in the field of personal data protection, including:

- unlawful processing of personal data – **1,422**;
- right of access to information about oneself – **157**;
- provision of recommendations and clarifications on personal data protection legislation – **361**;
- issues related to the organisation of personal data processing – **322**.

A total of **716** recommendations in the field of personal data protection were issued.

98 inspections on compliance with personal data protection legislation were conducted, resulting in **75** orders (prescriptions) to eliminate violations in the field of personal data protection.

Based on materials submitted by the Secretariat of the Commissioner to pre-trial investigation bodies regarding violations related to unlawful processing of personal data, information was entered into the Unified Register of Pre-Trial Investigations in **35** cases.

Throughout 2025, the Commissioner considered complaints related to the processing and protection of personal data arising in various areas of social relations. These concerned both the observance of the rights of data subjects and the fulfilment of legal obligations by data controllers and processors. The most common issues involved unlawful collection, use or disclosure of personal data, restrictions or refusals to grant individuals access to information about themselves, as well as violations related to inadequate organisation of data processing procedures. Data subjects, as well as controllers and processors, also sought the Commissioner's recommendations and clarifications regarding the practical application of legislation in this field.

Based on the results of 2025, the following cases of human rights violations in the field of personal data protection, in respect of which the Commissioner took response measures, should be highlighted.

a) Unlawful Processing of Personal Data

Unlawful processing of personal data consists in the collection, storage, or dissemination of information about a person without consent or without proper legal grounds, in violation of legal requirements. Typical manifestations include the publication of data on websites or social media, and the dissemination of data to an unrestricted number of persons through services or applications without lawful grounds. Such actions violate the right to privacy and may create significant risks for individuals, including the use of disclosed data for unlawful purposes. In some cases, the unlawful

dissemination of personal data may pose a threat to a person's personal security, health, or life.

In November, a serviceman applied to the Commissioner regarding the publication of his personal data on the Internet. Telegram bots contained information including his full name, date of birth, tax identification number RNOKPP, passport details, residential address, and phone number. The dissemination of personal data of other individuals was also recorded.

Given the existence of indications of a criminal offence related to the unlawful collection, storage, use, and dissemination of confidential information about a person, the Commissioner forwarded the materials to the National Police of Ukraine. As a result of the response, the information was entered into URPTI, and a pre-trial investigation was initiated under part one of Article 182 of the Criminal Code of Ukraine.

Unlawful use or dissemination of personal data may take various forms, such as using such data for extortion, establishing fictitious employment relationships, obtaining fraudulent loans, registering legal entities, or unlawfully accessing information from state registers. In cases where such facts are identified, the Commissioner forwards the relevant materials to law enforcement authorities for consideration of entering information into the URPTI and conducting a pre-trial investigation.

An applicant, Ms. A., applied to the Commissioner reporting the alleged unlawful use of her personal data by unidentified persons to obtain loans in her name.

Given the presence of indications of a criminal offence under part one of Article 190 of the Criminal Code of Ukraine (fraud), the Commissioner forwarded the materials to the Main Investigative Department of the National Police of Ukraine for verification of the reported facts. As a result of the response, the information was entered into the URPTI, and a pre-trial investigation was initiated under part one of Article 190 of the Criminal Code of Ukraine concerning the misappropriation of the complainant's funds through deception and the commission of unlawful operations using electronic computing technology.

b) Violation of the Right of Access to One's Own Personal Data

A violation of the right of access to one's own personal data occurs when a person is unjustifiably denied or delayed access to information about themselves held by

institutions or organisations, despite the existence of lawful grounds for such access. This includes, in particular, failure to provide information concerning personal data, medical records, property-related documents, employment-related information (such as hiring records or working conditions), or other data relating to the individual that is necessary for the exercise of their rights and legitimate interests.

The law guarantees everyone the right to access their own personal data, and unjustified refusals or delays in providing such information constitute a violation of this right. In such cases, the Commissioner opens proceedings and takes response measures aimed at restoring the individual's right of access to their personal data.

In January, an applicant was submitted to the Commissioner by Ms. B. regarding a violation by an extracurricular education institution of her right of access to her personal data. Within the framework of the proceedings, and upon the Commissioner's request, the extracurricular education institution reviewed the applicant's requests and provided access to information containing her personal data in accordance with legal requirements. As a result of the measures taken, the applicant's right of access to her personal data was restored.

c) Issues Related to the Organisation of Personal Data Processing

Proper organisation of personal data processing encompasses not only security measures and access control, but also ensuring the quality, accuracy and relevance of the data. The storage of inaccurate or outdated personal data may lead to unlawful consequences for individuals and effectively constitutes a manifestation of improper data processing practices. Therefore, the law expressly guarantees an individual the right to request the rectification or deletion of incorrect or outdated information, while data controllers and processors are obliged to ensure the timely updating of such data. In the event of non-compliance with these requirements, the Commissioner takes response measures to eliminate violations and restore the rights of data subjects.

In July, an applicant was submitted to the Commissioner by Ms. V. regarding errors made by a public authority during the processing of her personal data, which were used in the calculation of her pension.

Within the framework of the Commissioner's proceedings, measures were taken to verify the accuracy and currency of the applicant's personal data, and letters were sent to the relevant Pension Fund of Ukraine authority with recommendations to eliminate the identified deficiencies and correct the errors made in the applicant's personal data.

As a result, the information concerning the applicant was updated, and her right to personal data protection was restored.

8.1.2. Inspections in the Field of Personal Data Protection

One of the important aspects of monitoring compliance with personal data protection legislation is inspections conducted to assess the actual organisation and legal grounds of personal data processing, identify violations, minimise risks to the rights and freedoms of data subjects, and initiate response measures to eliminate such violations.

In accordance with Article 23 of the Law of Ukraine “On Personal Data Protection”, the Commissioner has the right, based on complaints or on their own initiative, to conduct on-site and off-site, scheduled and unscheduled inspections of data controllers or processors in the manner determined by the Commissioner, ensuring, in accordance with the law, access to premises where personal data are processed.

In 2025, inspections in the field of personal data protection covered **64** public sector entities, including the Ministry of Energy of Ukraine, the Ministry of National Unity of Ukraine, the Ministry of Foreign Affairs of Ukraine, the Central Election Commission, the High Qualification Commission of Judges of Ukraine, the State Judicial Administration of Ukraine, the State Tax Service of Ukraine, the State Regulatory Service of Ukraine, the National Agency of Ukraine for Finding, Tracing and Management of Assets Derived from Corruption and Other Crimes, **16** regional state administrations, as well as other state authorities, their territorial bodies, local self-government bodies, and structural units of executive bodies. In addition, inspections were carried out in respect of **21** municipal enterprises and utility service institutions (in the fields of water supply and wastewater management, housing and communal services, transport, urban maintenance, and certain healthcare institutions), as well as **13** private sector entities operating in logistics, media, energy, pharmaceuticals, and real estate.

During the inspections, it was found that the most common violations include incorrect determination of legal grounds for personal data processing, in particular the use of consent in cases where processing should be based on another legal ground provided by law. A significant number of violations are also related to the absence or improper formalisation of internal regulatory documents defining general requirements for personal data processing and protection, as well as insufficient informing of data subjects. In addition, other shortcomings in the organisation of personal data processing are identified, including the absence of contingency plans for emergencies and violations in record-keeping of processing operations.

In total, **98** data controllers and processors were inspected. As a result, **75** binding orders (prescriptions) to eliminate violations in the field of personal data protection were issued. The following violations of personal data protection legislation were identified:

- incorrect determination of legal grounds for personal data processing (for example, “consent” is used where processing should be based on another legal basis);
- absence of an approved internal regulatory document defining general requirements for personal data processing and protection, or existence of such a document that does not comply with legal requirements (in particular, failure to define categories of data subjects, composition of personal data, and procedures for processing and protection);
- failure to properly inform all data subjects about the data controller, the scope and content of collected personal data, their rights, the purpose of data collection, and/or recipients of personal data;
- absence of procedures for destruction/deletion of personal data after the retention period expires;
- absence of a contingency plan for unauthorised access to personal data, damage to technical equipment, or emergency situations;
- lack of records of employees with access to personal data;
- lack of records of personal data processing operations;
- lack of segregation of access to personal data;
- absence of defined procedures for employee access to personal data;
- absence of non-disclosure obligations regarding personal data.

8.1.3. Recommendations on the Practical Application of Personal Data Protection Legislation

The Commissioner is empowered to provide recommendations on the practical application of personal data protection legislation. Such recommendations are aimed at ensuring proper and uniform compliance with legal requirements by all participants in relevant legal relations.

The Commissioner also has the right to issue official clarifications regarding the rights and obligations of data subjects, as well as data controllers and processors. These clarifications are provided upon request of interested parties in order to ensure the correct understanding and application of legal provisions. In addition, clarifications may be provided to structural units and responsible persons organising personal data protection activities, as well as to other persons defined by law. This contributes to increasing legal certainty and the effectiveness of the personal data protection system in Ukraine. The provision of recommendations on the practical application of personal data protection legislation is important for preventing violations in this field.

During 2025, **716** recommendations on the practical application of personal data protection legislation were issued.

In 2025, the Commissioner provided, in particular, the following recommendations:

to the Ministry of Education and Science of Ukraine regarding general requirements for the processing and anonymisation of personal data;

to the Ministry of National Unity of Ukraine regarding certain aspects of the procedure for collecting personal data for the performance of functions and tasks;

to the Main Service Centre of the Ministry of Internal Affairs regarding legal grounds for the processing and protection of personal data;

to the Kyiv City Centre for Gender Equality, Prevention and Combating Violence regarding rights and obligations in the field of personal data protection and legal grounds for data processing;

to the Department of Health and Medical Support of the Zaporizhzhia City Council regarding procedures for access to personal data;

to the Department of Economic Development of the Lviv City Council regarding legal grounds for the disclosure of personal data;

to the Holosiivskyi District State Administration in Kyiv regarding the anonymisation of personal data.

8.1.4. Improvements to Legislation on Personal Data Protection

As Ukraine moves closer to the European Union, the protection of personal data plays a significant role in the framework of reforms aimed at ensuring compliance with European standards in the area of the rule of law. One of the key tasks in this regard is the harmonisation of national legislation with the provisions of the General Data Protection Regulation (GDPR).

The issue of updating personal data protection legislation and establishing an independent supervisory authority with expanded powers is a key component of personal data protection reform, which is of vital importance on Ukraine's path to accession to the European Union.

As the parliamentary oversight body in the field of personal data protection, the Commissioner actively participates in the reform processes in this area within the context of European integration. On an ongoing basis, the Commissioner and officials of the Commissioner's Secretariat are involved in inter-agency cooperation, working meetings, and the preparation of strategic documents aimed at aligning national legislation with European Union law.

The Commissioner's Secretariat participated in the drafting of the Action Plan for the implementation of the European Commission's recommendations presented in the Report on Ukraine's progress in the framework of the 2024 EU Enlargement Package, approved by the Cabinet of Ministers of Ukraine. The Plan provides, in particular, for:

- conducting an information campaign on the need to adopt the Law of Ukraine "On Protection of Personal Data" in its new edition and the Law of Ukraine "On the

National Commission for the Protection of Personal Data and Access to Public Information”;

- conducting an awareness-raising campaign on the updated legislation on the protection of personal data for persons responsible for the processing of personal data.

In view of this, the Commissioner’s Secretariat carried out a large-scale information campaign throughout 2025, aimed at explaining the key provisions of current legislation, as well as the expected changes related to the implementation of the GDPR.

The campaign aimed not only to raise awareness among citizens, businesses and state authorities, but also to foster in Ukraine a culture of careful and conscious handling of personal data in the digital age. Employees of the Commission's Secretariat, as well as experts, representatives of state authorities and civil society, and international partners, were involved in the implementation of the campaign. During the reporting period, **209** educational and legal awareness-raising events were held for **9,485** civil servants, representatives of business, and the public sector.

At the central level, 17 awareness-raising events were held for 2,944 people, including the Economic Security Bureau of Ukraine, the National School of Judges of Ukraine, the UNHCR, the Ukrainian National Bar Association, the National Police of Ukraine, the Ukrainian Red Cross Society, the Ministry of Internal Affairs of Ukraine and its departments, and other bodies.

The Commissioner’s regional offices carried out **192** awareness-raising events for **6,541** people on the need to adopt updated legislation on the protection of personal data, targeting those responsible for processing personal data, civil servants, and representatives of the business and public sectors.

The key elements of the campaign were:

- regular themed posts on the Commissioner’s official social media pages;
- organising educational events, conferences and round-table discussions for civil servants, business representatives and the third sector;
- organising training sessions and workshops to explain the new legal data protection mechanisms that will be introduced following the adoption of legislative changes.

The Commissioner also continues to exchange expertise and cooperate with foreign colleagues and international partners on the alignment of Ukrainian legislation with the standards of European data protection legislation.

With the support of international partners, the Commissioner’s Secretariat carried out the following work in this area in 2025:

- an educational series for data protection officers, entitled ‘Data Protection Officer (DPO) Training Course’, has been created and published on the national educational platform *Дія.Освіта* in both Ukrainian and English. The educational series consists of 13 episodes and 55 training videos covering, in particular, key concepts in the field of data protection, the principles and legal bases for data processing, data subjects’ rights, risk management, conducting audits, international aspects of data transfer, and issues relating to artificial intelligence, Big Data, 5G and cloud services;
- the course ‘A trainer development programme for Data Protection Officers (DPOs) in Ukrainian State Institutions’ was delivered in collaboration with the High School of Public Governance, with the support of the Estonian Centre for International

Development (ESTDEV) and the expert organisation “Proud Engineers”. The course consisted of online learning on the StudyiЯ educational platform, an offline training session and a final online module on coaching skills. The offline part of the training involved representatives from 20 state authorities;

- the European Data Protection Board’s (EDPB) guidelines on data subject rights, the right to be forgotten, consent, data protection by design and by default, the processing of personal data through video devices, and the personal data breach notification have been translated and published in Ukrainian;
- a presentation was delivered on the study entitled ‘Liability and sanctions for breaches of the General Data Protection Regulation (GDPR)’.

8.2. Right to Information

With the rapid development of information technology, services, social media and artificial intelligence in society, citizens require comprehensive, accurate and timely information, which must be provided by public information administrators.

That is precisely why, in the current circumstances, it is important that the publication and updating of information on websites or portals is carried out by information administrators, taking into account generally accepted and legally defined requirements regarding completeness, reliability, accuracy, timeliness, accessibility and inclusivity.

In 2025, following parliamentary oversight, the Commissioner received **6,574** appeals regarding violations of the right of access to public information, including:

- the right of access to public information – **1,072**;
- the right to information published in publicly available sources - **169**;
- the right to receive a response to a request for information – **2,278**;
- the right to receive information in a timely and comprehensive manner – **2,926**;
- other violations of the right to information - **129**.

2025 marked a slight improvement in the content of official websites of state authorities and local government bodies, with regard to information that is required to be published under the Law of Ukraine “On Access to Public Information”, the Law of Ukraine “On Local Self-Government in Ukraine” and other legislation.

The results of the consideration of citizens' appeals to the Commissioner revealed challenges and systemic violations in this area. Cyber threats associated with attacks on state resources lead to restrictions on access to information by subjects of public authorities, which are often disproportionate, and the staff shortage in the public sector directly affects not only the completeness and quality of published information, but also the very understanding of the importance of the obligation to publish information.

The issue of barrier-free access in the information space is increasingly being raised, because, based on the provisions of Article 34 of the Constitution of Ukraine, everyone has the right to freely collect, store, use and disseminate information.

Many official information resources provided by public authorities are not adapted for people with visual or hearing impairments, are not optimised for mobile devices, do not include text descriptions for images and, in general, do not comply with the

requirements of State standards of Ukraine EN 301 549:2022 ‘Information technology. Requirements for the accessibility of ICT products and services’.

A key development in 2025 was the adoption of Resolution No. 1151 of the Cabinet of Ministers of Ukraine dated 10 September 2025 “On Amendments to Resolutions of the Cabinet of Ministers of Ukraine No. 835 of 21 October 2015 and No. 867 of 30 November 2016”, which expanded the list of datasets and organised the information administrators responsible for publishing datasets. Such changes in the field of open data will undoubtedly impact the transparency of public administration and the creation of innovative digital products based on published datasets, as more structured information means the emergence of new analytical services, mobile applications and tools for investors.

Also, restrictions on access to information in 2025, due to the protection of national security interests, affected not only its publication, but also the provision of information upon requests.

The systematic pattern of improper restrictions on access to information, which had been observed since the start of the full-scale invasion, continued into 2025 and manifested itself in the improper application by information administrators of the ‘three-part test’ when considering citizens’ requests, ascertaining citizens’ purposes in obtaining public information, imposing requirements on requests not provided for by the Law of Ukraine “On Access to Public Information”, and unlawful refusals to provide information, examples of which are given below.

a) The Unjustified Classification of Information as Restricted

In accordance with the provisions of the Law of Ukraine “On Access to Public Information”, public information is open, except in cases provided for by law. This ‘presumption of openness’ means that restrictions on access to information are an exception, the application of which is intended for the sole purpose of protecting a legitimate interest.

Despite the fact that the procedure for restricting access to public information - the so-called ‘three-part test’ - is enshrined in part 2 of Article 6 of the Law of Ukraine “On Access to Public Information”, in 2025, information administrators systematically failed to apply it or applied it improperly, and also restricted access to categories of information that are open under the law and not subject to restrictions on access.

The ‘three-part test’ is not a mere formality, but the sole legally established means of verifying whether the necessary conditions for restricting access to information are met, consequently, its improper application when providing information in response to requests or when disclosing information is unlawful and infringes upon an individual’s right to information.

Administrators restrict access to information in order to protect national security and the rights of other citizens, however, the arguments put forward are of a formal nature, do not meet the requirements of the law, and do not satisfy all the elements of the ‘three-part test’. Restrictions on access to information often go beyond the scope of the ‘three-part test’, i.e. they are excessive and disproportionate, or are imposed to protect interests

not defined by either the Constitution of Ukraine or the Law of Ukraine “On Access to Public Information”.

Common instances include administrators restricting access to categories of information that are not subject to restriction, or imposing restrictions on information where this is expressly prohibited by law. Such violations relate to restricting access to information on the use of budget funds, details specified in the declaration of a person authorised to perform state or local government functions, information on the state of the environment, information on the activities of state or municipal enterprises, and etc.

In this context, particular attention should be paid to instances where local authorities publish incomplete video recordings of plenary sessions or committee meetings on their official websites, removing sections which, in the administrators’ view, contain restricted information, without in any way applying the ‘three-part test’ and without providing any justification whatsoever for the need to take precisely such measures to protect the legitimate interest.

Throughout 2025, the Commissioner initiated proceedings in which letters were sent to administrators and submissions were made regarding strict compliance with the requirements of the Law of Ukraine “On Access to Public Information” when restricting access to public information, with a view to restoring the infringed right to information.

In view of the challenge of striking a balance between openness and the protection of national security interests under martial law, the Secretariat of the Commissioner and the Ministry of Digital Transformation of Ukraine jointly developed and presented a training manual in 2025 “Recommendations on Restricting Access to Public Information”, which contains guidance for information administrators on restricting access to information and is designed to help establish a consistent approach to implementing the relevant legal provisions, as well as to prevent unjustified restrictions on access to information.

A citizen Ch., addressed the Commissioner regarding a violation by the Podilskyi District State Administration in Kyiv of his right to information, which consisted of restricting access to the requested documents containing information on public access to a site of local significance in Kyiv and relating to the state of the environment. The information administrator failed to take into account that, in accordance with the provisions of the Law of Ukraine “On Information”, environmental information cannot be classified as information with restricted access. It also failed to take into account that, in accordance with the Law of Ukraine “On Access to Public Information”, it is the information, not the document, that is subject to restriction of access.

As part of the proceedings initiated by the Commissioner, the aforementioned district state administration re-examined the request for information submitted by citizen Ch. and provided copies of the requested documents, with information subject to restricted access redacted in accordance with the requirements of the Law of Ukraine “On Access to Public Information”, whilst ensuring that environmental information was included in the copies of the documents.

b) Introduction of Additional Requirements for the Submission of Requests for Information

It has been 15 years since the adoption of the Law of Ukraine “On Access to Public Information”, yet during parliamentary oversight of compliance with the right of access to information, there are still instances of refusals to provide information and even failures to register requests for information.

To justify their actions, information administrators require requesters to sign their requests with a qualified electronic signature or to provide a scanned file in .pdf format showing the requester’s signature, the author of the request, the requester’s place of residence, the addressee of the administrator, etc.

The general requirements for submitting a request for information are set out in part 5 of Article 19 of the Law of Ukraine “On Access to Public Information”, according to which a request for information must contain: 1) the name (or business name) of the requester, their postal address or email address, and their contact number, if available; 2) a general description of the information or the type, title, details or content of the document to which the request relates, if known to the requester; 3) a signature and date, provided the request is submitted in writing.

These requirements for submitting a request for information are minimal, they define the nature of the information being requested – namely, that it is public in nature, accessible to an unlimited number of people, of an informative nature for the information administrator, and do not affect the administrator’s compliance with the requirements of the Law of Ukraine “On Access to Public Information”.

A citizen P., addressed the Commissioner regarding a violation by the NACP of his right to information. The requester submitted the request for information via the unified platform for submitting electronic requests on the ‘Access to the Truth’ website. In the response, which is publicly available, citizen P. was informed that the request for information would not be registered due to the absence of a cover letter bearing his signature.

Based on the results of the response measures taken by the NACP, the aforementioned request of citizen P. was registered, it was considered and a response was provided in accordance with the provisions of the Law of Ukraine “On Access to Public Information”.

In accordance with paragraph 3 of Part 1 of Article 3 of the Law of Ukraine “On Access to Public Information”, one of the safeguards for ensuring the right of access to public information is the maximum simplification of the procedure for submitting requests and obtaining information. One of the elements of the guarantee of such simplification is that the information administrator cannot take measures to establish any additional requirements for the request than those specified in Article 19 of the Law of Ukraine “On Access to Public Information”.

In order to ensure the right to information is fully and comprehensively upheld, the Commissioner recommends that public information administrators refrain from creating artificial barriers to accessing information, imposing any requirements on requests that are not necessary for their processing. In view of this, it is worth taking into account the position set out in paragraph 9.6 of Resolution No. 10 of the Plenum of the High Administrative Court of Ukraine dated 29 September 2016 “On the practice of

administrative courts in applying legislation on access to public information”, according to which the duty of the information administrator to provide information (documents) upon request does not vary depending on the identity of the requester and the inclusion of his or her name in the request, provided there are no grounds for restricting access to such information.

Therefore, when deciding whether or not to provide information in response to a request, any information administrator should focus on the fact that such information is in the public domain and that its disclosure will not cause significant harm to national security interests.

In January 2025, the Commissioner received an appeal from citizen K. regarding the failure of the Mykhailo Dragomanov National University (hereinafter referred to as the University) to provide a copy of a specific document, on the grounds that his request for information, submitted by email, had not been signed with a qualified electronic signature.

As part of the proceedings initiated by the Commissioner, the University has reconsidered the request for information submitted by citizen K. in accordance with the requirements of the Law of Ukraine “On Access to Public Information” and has provided a copy of the requested document.

c) Non-Disclosure of Information

The issue of non-disclosure of information is of paramount importance in today’s democratic society. Openness and transparency in the activities of state authorities and local government bodies is an important condition for citizens’ trust in the authorities. Ukrainian legislation requires such bodies to disclose public information in the prescribed formats and within the prescribed timeframes. However, in practice, there are often instances where information is not disclosed or is disclosed late. This may restrict citizens’ right of access to public information.

One of the common problems is the incomplete publication of information on the official websites of state authorities: up-to-date decisions, draft legal acts or financial information are missing. A similar situation is observed in the activities of local authorities. As a result, citizens are unable to access important information in a timely manner.

During 2025, the Commissioner’s Secretariat carried out 383 off-site inspections/monitoring visits to assess compliance with human and citizens’ rights to information, in particular regarding the disclosure of information by administrators in accordance with the requirements of Article 15 of the Law of Ukraine “On Access to Public Information”.

Typical violations identified during the off-site inspections carried out include the following: failure to publish the procedure for compiling and submitting requests for information, and for appealing against decisions, actions or omissions by information administrators; reports, in particular regarding the fulfilment of requests for information; information on the structure, principles of formation and amount of remuneration, bonuses, additional benefits for the head and deputy head; publication of outdated information on the activities of public authorities.

Based on the results of the inspections carried out and the information received from the entities inspected, it appears that information administrators generally ensure the disclosure of information as required by law, however, the state of such disclosure requires constant monitoring and improvement.

Together with experts from the ‘Human Rights for Ukraine, Phase II’ project, implemented by the United Nations Development Programme (UNDP) in Ukraine, a traditional all-Ukrainian monitoring of the provision of information rights was conducted. This monitoring covered **200** public information administrators (**25** regional military administrations and the Kyiv City Military Administration, **102** district military administrations and **73** city councils) and included checking the publication of public information on official websites, the ability to exercise the right to submit oral and written requests and appeals to monitoring objects, as well as an assessment of the reasonableness, completeness and quality of responses to requests and appeals.

Based on the results of the monitoring, a “Report on the Monitoring of the State of Information Rights under Martial Law in 2025” was compiled, which includes a ranking of information administrators, conclusions and recommendations to public authorities regarding the proper safeguarding of citizens’ information rights.

Ensuring that information required by law is properly disclosed will help to increase the transparency of public authorities’ activities, improve public scrutiny and enhance communication between the authorities and citizens.

The issue of disclosing information is closely linked to public information in the form of open data – public information in a format suitable for automated processing, i.e. without human intervention.

The list of datasets to be published as open data has been expanded to include new datasets from key bodies in the justice sector: the Constitutional Court of Ukraine, the Advisory Group of Experts, the State Judicial Administration, the High Council of Justice, the Ethics Council, the High Qualification Commission of Judges, the Council of Judges, the National Bar Association and the Qualification and Disciplinary Commission of Prosecutors.

One obstacle to the proper publication of datasets is, in particular, the limited list of guidelines issued by the Ministry of Digital Transformation of Ukraine on the Single State Open Data Portal, which must be strictly adhered to when uploading datasets.

The issue of the Ministry of Digital Transformation of Ukraine approving guidelines for conducting information audits also remains unresolved. This would enable information administrators to assess the status and quality of published datasets and identify those that need to be made public. Therefore, in 2025, new challenges have been set for public information administrators related to the transparency and accessibility of information about their activities.

With a view to properly safeguarding the right to information through the publication of information by public authorities on their official websites, the Commissioner and the Ministry of Culture and Strategic Communications of Ukraine, with the support of the ‘Human Rights for Ukraine, Phase II’ project implemented by the United Nations Development Programme (UNDP) in Ukraine, Methodological Guidelines on the Content of Official Websites of Executive Authorities and Local Self-Government Bodies have been developed, containing recommendations on organising the

structure of sections and main subsections of official websites, ensuring navigational accessibility and the inclusivity of public information on websites, and so on.

During the event, which focused on the publication of datasets by information administrators in 2025, the expert and analytical center presented an update of the dashboard on the implementation of the requirements of the Resolution of the Cabinet of Ministers of Ukraine dated October 21, 2015 No. 835 “On Approval of the Regulation on Datasets Subject to Publication in the Form of Open Data”.

Based on the results of the dashboard processing, the Commissioner's Secretariat took measures to ensure that public information administrators properly publish it in the form of open data. Based on the results of the measures taken, the Accounting Chamber published a data set containing information on the Accounting Chamber's reports on the results of the state external financial control (audit) exercise.

d) Unlawful Denial to Provide Information

An unlawful denial of a request for information is one of the most common violations of the right of access to public information. The Law of Ukraine “On Access to Public Information” clearly sets out an exhaustive list of grounds on which an information administrator may deny access to information. Any denial that does not meet these grounds is considered unlawful. Furthermore, public information administrators should take particular note that, in accordance with Part 2 of Article 22 of the Law of Ukraine “On Access to Public Information”, a response that does not address the substance of the request constitutes an unlawful denial. For example, providing explanations instead of a copy of the document requested by the requester, or providing an extract from the document instead of a copy, does not constitute a proper response to the request if the requester specifically asked for a copy.

A citizen K., addressed the Commissioner regarding a violation by the Ministry of Justice of Ukraine (hereinafter ‘the MinJust’) of his right to information. The requester sent a request for information to the MinJust asking for a copy of a specific document, but received, in response, an explanation regarding the application of legislation on the civil service.

Following the measures taken, the MinJust’ reconsidered the request for information submitted by citizen K. and issued a reasoned denial in accordance with Part 1 of Article 22 of the Law of Ukraine “On Access to Public Information”.

In 2025, there were also instances where administrators unlawfully denied requests on the grounds that the requester had not provided a valid reason for making the request. The Law of Ukraine “On Access to Public Information” does not require the requester to explain the purpose of obtaining public information.

Citizen R. addressed the Kyiv Professional College of Architecture, Construction and Management (hereinafter referred to as the College) with a request regarding the number of students, the number of beds in the College dormitory, the amount of

expenses for repair work, etc. However, he was not provided with the requested information, nor was he informed of the denial of his request. In the College's written response, the non-provision of information was justified by the fact that the requester did not indicate the purpose of obtaining the requested information, the method of its dissemination, and the circle of persons to whom this information is planned to be disseminated.

The Commissioner initiated proceedings, and as a result of the measures taken, the citizen R. was provided with the requested information.

It remains common practice to unlawfully deny access to information on the grounds that the requested document contains personal data of individuals. Such violations are permitted in cases where access restrictions are expressly prohibited by law, or if the requested information concerns a person authorized to perform state or local government functions, official or service powers.

A citizen S., addressed the Commissioner regarding a violation by the State Labour Service of Ukraine (hereinafter 'the State Labour Service') of his right to information. In response to his request for copies of certain documents relating to the appointment of a State Labour Service employee to a civil service post, the requester was informed that, in accordance with the Law of Ukraine "On the Protection of Personal Data", the consent of that employee was required in order to resolve the matter of granting his request.

Six months later, citizen S. resubmitted a request for information regarding the matter in question, but the State Labour Service denied the information request, citing the lack of consent from the individual concerned.

Based on the results of the response measures taken, the State Labor Service provided citizen S. with the requested documents.

8.3. Right to Appeal

In accordance with Articles 55 and 101 of the Constitution of Ukraine, the Commissioner exercises parliamentary oversight over the observance of the human and citizens' constitutional rights and freedoms, in particular the right to appeal and receive a reasoned response.

Article 40 of the Constitution of Ukraine guarantees everyone the right to file individual or collective petitions, or to personally appeal to public authorities. These authorities are obliged to consider such petitions and provide a substantiated response within the term established by law. This right forms part of the list of fundamental democratic guarantees that ensure citizens' interaction with the state, participation in public administration and oversight of the activities of public authorities.

At the same time, the practice of considering appeals during the period of martial law indicates the presence of systemic problems in the activities of certain state authorities, local government bodies, enterprises, institutions, and organizations.

By the end of 2025, the Commissioner had received **9,785** issues from individuals and legal entities concerning the failure of public authorities to respect the constitutional right of human and citizen to submit appeals and receive a response, in particular:

- right to appeal – **2,533**;
- the right to make an appeal - **382**;
- the right to a personal consultation - **560**;
- the right to have one's application considered in a timely manner – **1,002**;
- the right to a fair hearing – **1,777**;
- the right to receive a written response – **2,942**;
- the right to ensure that correspondence is forwarded to the appropriate authority - **218**;
- the right to petition - **30**;
- the right to the proper and timely consideration of citizens' applications and appeals by the bodies and departments of the National Police of Ukraine - **341**.

Referring to restrictions caused by martial law, the subjects of consideration of appeals admit cases of a formal approach to their processing, unjustified restriction of the right to receive citizens in person, violation of the deadlines for considering appeals, leaving them unanswered, as well as creating obstacles to the exercise of the right to submit electronic petitions.

Such violations negatively affect the functioning of the public administration system and the level of citizens' trust in government bodies.

The issue of updating legislative regulation in the field of citizens' appeals requires special attention. The Law of Ukraine “On Citizens' Appeals”, adopted in 1996, largely does not take into account modern standards of administrative procedures, digitalization of public services and principles of good governance. The adoption of the Law of Ukraine “On Administrative Procedure” necessitated the harmonization of mechanisms for considering citizens' appeals with new approaches to interaction between an individual and public administration.

In order to eliminate legal conflicts and improve legal regulation, in March 2024, the draft Law of Ukraine “On Appeals” dated March 13, 2024 (Registration No. 11082) was submitted to the Verkhovna Rada of Ukraine, which was adopted in April 2024 as a basis for further refinement prior to the second reading. Officials of the Commissioner's Secretariat participated in the discussion of the aforementioned draft law and provided comments and proposals aimed at strengthening guarantees for the realisation of the right to appeal.

Throughout 2025, work on the draft law “On Appeals” continued, given its crucial importance in ensuring the effective exercise of citizens' constitutional right to appeal.

Based on the results of the analysis of citizens' appeals to the Commissioner in 2025, it was established that there are difficulties in the full implementation by the subjects of consideration of appeals of their duties stipulated by the Law of Ukraine “On Citizens' Appeals”, in particular by state authorities, local self-government bodies, enterprises, institutions and organizations.

In these circumstances, the parliamentary oversight exercised by the Commissioner takes on particular significance. The Commissioner's response is aimed not only at restoring the violated rights of specific applicants, but also at eliminating the causes and conditions leading to systemic violations of the right to appeal, improving the practice of handling appeals, and ensuring that public authorities properly fulfil their duties towards citizens.

a) Restrictions on the Exercise of the Right of Citizens to Appeal

Restrictions on the exercise of the right of citizens to appeal are unacceptable, as this right is one of the fundamental guarantees of individuals' participation in public affairs and the protection of their legitimate interests. Any obstacles to the submission or consideration of appeals are contrary to the Constitution of Ukraine, violate the principle of accessibility of public authorities and undermine citizens' trust in state institutions.

A citizen K., addressed the Commissioner with a complaint regarding the failure of an online media outlet to respond to his written appeal, submitted in accordance with the Law of Ukraine "On Citizens' Appeals". The citizen noted that his appeal had been dealt with in a formal manner, and that the email response he received did not address the issues raised and did not comply with the legislative requirements for the consideration of citizens' appeals. In order to verify the arguments set out in the appeal and to ensure the citizen's right to appeal was upheld, the Commissioner sent a respective request to the subject of consideration of the appeal, demanding information on the results of its consideration and copies of the replies provided to the citizen.

Based on the results of the Commissioner's response, the subject of consideration of the appeal informed about the re-consideration of the citizen's appeal by authorized officials and the provision of a written response in accordance with the procedure established by law, stating the position on the merits of the issues raised in the appeal and complying with the requirements of the Law of Ukraine "On Citizens' Appeals".

Therefore, the Commissioner's intervention contributed to the restoration of the violated right of a citizen to appeal and receive a response, as well as the need for strict compliance with legislative requirements by the subject of consideration of the appeal regarding the form, content, and procedure for considering citizens' appeals.

b) Restrictions on Citizens' Right to a Personal Reception

Article 22 of the Law of Ukraine "On Citizens' Appeals" deals with the issue of holding personal receptions of citizens, the provisions of which impose on heads and officials of state authorities, local self-government bodies, enterprises, institutions, organisations irrespective of their form of ownership and citizens' associations the duty to hold personal receptions of citizens, which must take place regularly, on specified days and at specified hours, at a time convenient for citizens, at their place of work and residence.

The Commissioner has received numerous appeals from citizens regarding the failure to hold personal receptions by the National Police of Ukraine and its regional offices following the imposition of martial law. These appeals were submitted to the Commissioner by citizens L., S., B. and others.

In order to address the identified violations, the Commissioner sent a letter of response to the National Police of Ukraine. Following the measures taken, the National Police of Ukraine informed that heads of police bodies (units) had been instructed to update their schedules for personal reception of citizens, ensure their publication, designate responsible officials, consider the possibility of holding personal reception online, and ensure the operation of public reception offices whilst taking security measures into account.

At the same time, cases of restrictions on the right to personal reception by public sector entities have been identified.

Information regarding the temporary suspension of personal reception of citizens due to the martial law has been posted on the official website of the joint-stock company 'Ukrposhta'.

Following a systematic analysis and pursuant to Article 15 of the Law of Ukraine "On the Ukrainian Parliament Commissioner for Human Rights", a submission from the Commissioner was sent to the Company's Director General. In response, the Company informed that measures had been taken to ensure the possibility of holding personal reception of citizens, in particular the updating of the rules for personal reception in the first quarter of 2026, taking into account the Commissioner's recommendations, the security situation and other objective factors.

c) Failure to Meet Deadlines for Processing Appeals and Leaving Them Unprocessed

State authorities and local government bodies are obliged to consider citizens' appeals within the timeframes clearly defined by law, as compliance with these deadlines is an integral part of the human right to effective protection. Failure to consider appeals in a timely manner or unreasonable delays in resolving them violate citizens' constitutional right to submit an appeal and receive a response.

The Commissioner regularly receives appeals from citizens regarding breaches by the Pension Fund of Ukraine and its regional offices of the deadlines for considering appeals, or the failure to consider them at all. Such appeals have been submitted by citizens G., K., M. and others.

Citizens report instances where appeals concerning the award, recalculation or payment of pensions, the recognition of insurance periods, or the provision of clarification on pension matters remain unanswered or are processed with significant delays in relation to the deadlines specified in the Law of Ukraine "On Citizens' Appeals".

Such actions (or inaction) are contrary to the provisions of the Constitution of Ukraine and the Law of Ukraine “On Citizens’ Appeals”.

Based on the results of the Commissioner's response, in particular, sending requests and demands for explanations, the Pension Fund of Ukraine and its territorial bodies, as a rule, provide answers to the essence of the issues raised, and in some cases, make decisions aimed at restoring the violated rights of applicants.

At the same time, the systemic nature of such appeals indicates the presence of problems in the work of the Pension Fund of Ukraine and its territorial bodies.

d) Violation of the Right to Submit and Have Electronic Petitions Considered

Electronic petitions are an important form of direct citizen participation in public administration. Ignoring such petitions or treating them as a mere formality undermines the substance of constitutional rights, runs counter to the principles of openness and accountability of public authorities, and limits citizens’ ability to influence decision-making.

A citizen P., addressed the Commissioner regarding a violation of his constitutional right to participate in the administration of local affairs by submitting electronic petitions. According to him, the electronic petitions he had created on the official website of the South Ukrainian City Council were rejected, of which he received written refusals.

Following the Commissioner's response, the City Council stated that the rejection of the petitions was due to a lack of adequate technical infrastructure, in particular a user verification module. In order to address the identified shortcomings, the local authority is taking steps to integrate qualified electronic signatures, connect to the Unified State Web Portal of Electronic Services, and utilise the ‘Diia.Signature’ (‘Diia ID’) service.

It was also reported that the electronic petitions submitted by the applicant would be published once the technical issues had been resolved, provided they met the legal requirements. Therefore, the Commissioner’s response contributed to clarifying the reasons for the restriction of the right to submit electronic petitions and to the restoration of the citizen’s infringed rights.

8.4. Awareness-Raising Campaigns on the Exercise and Protection of Citizens’ Right to Appeal and Access to Public Information

To raise awareness among officials regarding the exercise and protection of citizens’ rights to appeal and access public information, during the reporting period, staff at the Commissioner’s Secretariat at central and regional levels conducted **653** training and legal awareness-raising events (training sessions, round-table discussions, conferences, lectures, seminars, etc.) for **24,502** representatives of state authorities

and local self-government bodies, in particular for the State Audit Service of Ukraine, the National Police of Ukraine, the Central Election Commission, the Economic Security Bureau of Ukraine, the Pension Fund of Ukraine, the National School of Judges of Ukraine, the Qualification and Disciplinary Commission of Prosecutors, the All-Ukrainian Association of Local Self-Governments 'Association of Amalgamated Territorial Communities', the Rivne Regional Branch of the Association of Ukrainian Cities, the Patrol Police Department, the Zhytomyr Regional Prosecutor's Office, the Kyiv City Centre for Recruitment and Social Support, and the authorities and local self-government bodies of the Volyn region and other regions.

These activities contributed to raising officials' awareness of the legal requirements in the field of observing the right to appeal of citizens, access to public information, the formation of a unified law enforcement practice, and the improvement of skills in processing citizens' appeals.

8.5. Conducting Inspections on Compliance with Human and Citizen Rights to Appeal and Information

As part of parliamentary oversight of the right to appeal, **383** off-site inspections/monitoring visits were carried out in 2025 on the observance of human and citizen rights to appeal and information. At the central level, these inspections covered **37** public authorities, including the State Border Guard Service of Ukraine, the National Accreditation Agency of Ukraine, the State Service of Ukraine for Transport Safety, the State Service of Ukraine for Food Safety and Consumer Protection, the Main Directorate of the State Service of Ukraine for Food Safety and Consumer Protection in Kyiv, **10** district state administrations in Kyiv, **15** territorial bodies of ministries and departments in the Kyiv region, and **7** district state administrations in the Kyiv region. In addition, **1** on-site monitoring visit was carried out to the municipal non-profit enterprise 'Regional Clinical Children's Hospital' of the Kirovohrad Regional Council. At the regional level, off-site inspections were carried out in **345** local self-government bodies and local executive authorities. All inspections were conducted by analysing information published on the official websites of the relevant bodies and making telephone calls to ascertain information regarding the organisation of work on citizens' appeals and the implementation of the right to a personal reception.

Based on the results of the off-site inspections, typical violations of the law in the field of citizens' appeals were identified, in particular:

- the absence of approved and published schedules for personal reception of citizens by the heads of the inspected facility;
- failure to publish, or incomplete publication on official websites, of normative and legal acts and internal documents governing the procedure for submitting and considering citizens' appeals;
- lack of information about the operation of hotlines or their actual absence;
- failure to create conditions for submitting oral appeals by citizens, in particular due to the lack of hotline contact numbers;

- inadequate information to citizens about how to contact the authority, responsible officials, and deadlines for considering appeals.

Based on the results of the inspections, relevant reports were sent to the inspection objects with requirements for eliminating the identified shortcomings and ensuring the proper implementation of citizens' right to appeal.

RECOMMENDATIONS:

To the Ministry of Digital Transformation of Ukraine:

to develop and approve guidelines for conducting an information audit;
to develop and publish on the Single State Open Data Portal guidelines for downloading the datasets specified in the list of datasets required to be published as open data.

To the Ministry of Defence of Ukraine:

within the scope of its powers, to take educational and organisational measures in the field of cybersecurity and cyber defence to prevent unauthorised access to personal data.

To the State Service for Special Communications and Information Protection of Ukraine:

to strengthen oversight of the state of cyber security for state information resources, restricted-access information and critical information infrastructure.

To the National Police of Ukraine:

to develop and publish recommendations on fraud prevention and safe behavior on the Internet, in particular, clarify the mechanisms for recording and reporting illegal facts and the algorithm of priority actions for victims.

To the National Bank of Ukraine:

to organise awareness-raising activities and provide guidance to the citizens on payment security, cyber hygiene and the rights of financial services consumers in order to prevent fraud.

9. EQUAL RIGHTS

Number of appeals	1,756
Number of proceedings	99
Number of rights restored (individual and collective)	157
Number of draft normative and legal acts processed	190
Number of inspections (on-site and off-site)	174
Number of recommendations developed based on monitoring results	684
Number of protocols compiled	1

9.1. Combating Discrimination

9.1.1. General Trends and Challenges Regarding Compliance with the Principle of Equality and Non-Discrimination

Ensuring equality and non-discrimination is one of the key constitutional principles and an integral part of the human rights protection system in Ukraine. In accordance with the law, the Commissioner exercises parliamentary oversight over compliance with the principle of equality, takes measures to prevent and combat discrimination, and acts as the national equality body (Equality Body).

The Commissioner's mandate generally complies with European standards regarding the activities of equality bodies, which provide for institutional independence, sufficient powers, accessibility for victims, and the ability to provide both individual protection and systemic influence on state policy. At the same time, strengthening the institutional capacity of the Commissioner as an equality body, ensuring adequate resources for the exercise of powers, and guaranteeing independence are key components of Ukraine's fulfilment of its obligations in the field of European integration, particularly in the context of implementing Council Directive (EU) 2024/1499 and Directive (EU) 2024/1500 of the European Parliament and of the Council, as set out in the Roadmap on the Rule of Law, approved by Order of the Cabinet of Ministers of Ukraine No. 475-r of 14 May 2025 (hereinafter – Order No. 475-r of 14 May 2025).

As the national equality body, the Commissioner focuses, among other things, on aligning national anti-discrimination legislation and practices with the EU acquis, EU Directives on equality and the standards of the FRA (EU Agency for Fundamental Rights), the Council of Europe, in particular the recommendations of the ECRI (European Commission against Racism and Intolerance).

As part of the implementation of the Roadmap on the Rule of Law, the Commissioner takes part in preparing amendments to legislation, in particular regarding:

- expanding the list of grounds protected against discrimination (in particular, the inclusion of sexual orientation and gender identity), addressing the issue of protection against discrimination by association, multiple discrimination;
- the introduction into legislation of the concept and definition of ‘hate speech’, and the establishment of a mechanism for responding to such cases;
- introduction of administrative liability for discrimination not related to violence.

Furthermore, the Commissioner is designated as the responsible for implementation of certain measures under the Roadmap on the Rule of Law in the field of preventing and combating discrimination, specifically regarding:

- conducting public information campaigns to raise awareness of the forms and manifestations of discrimination, the rights of victims and the legal remedies;
- developing recommendations for public authorities on the collection, recording and exchange of disaggregated data on cases of discrimination;
- improving the recording of citizens' appeals regarding discrimination.

In July 2025, the draft Law of Ukraine “On Amendments to the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine regarding combating manifestations of discrimination” (Reg. No. 5488 of 13 May 2021), submitted for consideration by the Cabinet of Ministers of Ukraine, was withdrawn from consideration following the resignation of the Government of Ukraine.

Meanwhile, in the Verkhovna Rada of Ukraine, on the initiative of a group of Ukrainian members of parliament, a draft law of Ukraine has been registered entitled “On Amendments to the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine regarding combating manifestations of discrimination” (reg. No. 13597 of August 4, 2025), aimed at strengthening legal protection for victims of discrimination, introducing effective mechanisms for responding to cases of discrimination and offences motivated by intolerance, with a view to aligning national legislation with EU and Council of Europe standards in the field of human rights.

In 2025, the principle of non-discrimination was implemented against the backdrop of the Russian Federation’s ongoing armed aggression against Ukraine and the legal regime of martial law, which has an impact on the nature of human rights violations and exacerbates the risks of discrimination.

Over the course of the year, the Commissioner received 2,535 reports on cases of discrimination on various grounds, including: religious beliefs – 1,803; disability – 203; place of registration or residence – 66; health condition – 65; ethnic (national) origin – 53; language – 46; gender – 33; and on other grounds.

A total of 155 reports were also received concerning restrictions on the right to an accessible environment (accessibility of facilities, services, transport, information and communications, etc.), 78 concerning gender-based violence, and 21 concerning freedom from the spread of hate speech.

An analysis of appeals to the Commissioner, monitoring results, and a synthesis of information from state authorities and civil society indicate that systemic problems persist in the field of combating discrimination: unequal access to services, manifestations of hate speech, crimes motivated by intolerance, discriminatory practices against individuals and groups characterised by various vulnerabilities, failure to ensure an accessible

environment, and violations of the principles of equal rights and opportunities for women and men.

9.1.2. Combating Hate Speech and Crimes Motivated by Intolerance

Combating hate speech and crimes motivated by intolerance remains one of the key areas for ensuring the principles of equality and non-discrimination in Ukraine, and in 2025 retained its relevance. Such manifestations pose an increased social danger, as they encroach not only on the rights of specific individuals or groups of individuals, but also on the principles of a democratic society, respect for human dignity, and social cohesion.

The key issues identified in previous years remained unresolved in 2025. These include the lack of a comprehensive approach to identifying and countering hate speech, the imperfection of criminal law mechanisms for responding to hate crimes, and the insufficient level of inter-institutional coordination.

Within the scope of his mandate, the Commissioner monitored the media for instances of hate speech and crimes motivated by intolerance, responded to appeals from individuals whose rights had been violated, and also interacted with law enforcement agencies and other state authorities, consistently emphasising the need to take due account of the motive of intolerance, to comply with the standards established in the case law of the European Court of Human Rights, and to ensure the effective protection of victims' rights.

Following the Commissioner's response to a report identified during media monitoring regarding the dissemination on TikTok of content containing aggressive anti-Semitic statements and calls for violence, the Main Directorate of the National Police in Cherkasy region has launched a pre-trial investigation in criminal proceedings on the grounds of a criminal offence under Part 1 of Article 161 (Violation of the equality of citizens on the grounds of their racial, national or regional origin, religious beliefs, disability or other grounds) of the Criminal Code of Ukraine, and has attached the materials of the Commissioner's appeal to the criminal proceedings.

A common problem is discrimination on the basis of ethnicity, in particular, in media content through the reproduction of negative stereotypes, humiliation of honour and dignity, and demonstration of a biased or distorted image of certain national minorities (communities).

In December 2025, the Commissioner received an appeal from the international charitable organisation 'Roma Women Fund 'Chiricli' regarding the use of discriminatory language in the trailer for the Ukrainian-produced film 'Nu Mam', which demeans the dignity of persons belonging to the Roma community.

The Commissioner addressed the MinCult, the National Council on Television and Radio Broadcasting (hereinafter referred to as the National Council), the SSUFSCP, and the Ukrainian State Film Agency to clarify the circumstances and procedure for approving promotional materials.

Following the Commissioner's response, the film's production company re-edited the promotional material and removed the discriminatory scene from the film.

Following the entry into force of the Law of Ukraine “On Media”, the National Council, with regard to violations by media entities of paragraphs 2 and 3 of Part 1 of Article 36 of this Law, adopted four decisions (one in 2024, 3 in 2025) and imposed measures in the form of 2 orders and 2 fines.

Responding to the spread of hate speech online, particularly on sharing platforms that are not covered by the definition of ‘media’, remains a challenge. Mechanisms for interaction between national authorities and international digital platforms remain limited, making it difficult to promptly stop the dissemination of content that contains elements of hate speech, even in cases where national legislation explicitly prohibits its dissemination.

Crimes committed on grounds of intolerance, as before, pose a separate challenge for the criminal justice system. There remains a tendency to disregard the motive of intolerance when classifying criminal offences, with the result that such acts are often investigated without taking account of their discriminatory nature.

According to the Office of the Prosecutor General, in 2025, **136** criminal proceedings were initiated on the grounds of violation of citizens’ equality depending on their racial, national or regional origin, religious beliefs, disability or other grounds (Article 161 of the Criminal Code of Ukraine). During the reporting period, 63 proceedings were sent to court with an indictment, including proceedings initiated in previous years.

In 2025, 15 criminal proceedings were initiated for the import, production or distribution of works that promote the cult of violence and cruelty, racial, national or religious intolerance and discrimination (Article 300 of the Criminal Code of Ukraine), and 2 proceedings were sent to court with an indictment.

A positive step was the amendment of the Regulations on the Unified Register of Pre-trial Investigations, the procedure for its establishment and maintenance, approved by Order of the Prosecutor General No. 298 of 30 June 2020 (as amended by Order No. 231 of 17 August 2023), pursuant to which information on criminal offences will be recorded taking into account their discriminatory motive on various grounds, and offences related to discrimination will be designated as a separate category.

However, a related issue remains the limited access to legal aid for victims of hate crimes, as not all categories of persons are included in the list of recipients of free secondary legal aid, as defined by the Law of Ukraine “On Amendments to the Law of Ukraine ‘On Free Legal Aid’ regarding the expansion of the list of persons entitled to free secondary legal aid” of 5 December 2024 No. 4133-IX, and the postponement of its entry into force (one year after the termination or lifting of martial law) effectively maintains the existing gap in the safeguards for the protection of such victims.

Addressing these issues requires systemic changes aimed at improving legislation, developing law enforcement practices, enhancing the competence and capacity of the

authorised bodies, and further aligning national approaches with the standards of the Council of Europe and the EU.

For this reason, the Roadmap on the Rule of Law, approved by Order No. 475-r of 14 May 2025, includes measures designed to ensure effective legal protection against discrimination through the introduction of new mechanisms in legislation, the enhancement of the professionalism of staff at the responsible institutions, and raising awareness among victims of their rights in accordance with EU legislation; the establishment of legal protection mechanisms to combat racism, xenophobia and hate speech in accordance with EU Council Framework Decision 2008/913/JHA of 28 November 2008 on combating certain forms and expressions of racism and xenophobia by means of criminal law.

In particular, a Working Group has been established under the State Service of Ukraine for Ethnic Policy and Freedom of Conscience (hereinafter referred to as the DESS) to coordinate cooperation between state authorities on preventing and combating discrimination. The Secretariat of the Commissioner is represented on this working group. The working group's remit is to draft relevant legislative amendments.

9.1.3. Protecting the Rights of the LGBTIQ+ Community

LGBTIQ+ people remain one of the groups least protected against discrimination, hate speech and other forms of intolerance.

At the same time, according to a sociological survey conducted by the Kyiv International Institute of Sociology (KIIS) at the request of the LGBT Human Rights Centre 'Our World', Ukrainian society's attitude towards LGBT people is gradually improving.

78.1% of those surveyed in 2025 agreed that LGBT people should have the same rights as other Ukrainian citizens (70.4% in 2024 and 67.3% in 2023).

Under martial law, certain risks for LGBTIQ+ people have increased. Restrictions on certain rights, necessary for reasons of national security required particularly careful observance of the principle of proportionality and the prevention of unjustified unequal treatment.

The Commissioner conducted proceedings following an appeal from a transgender woman regarding a violation of her right to equal treatment whilst crossing the Ukrainian state border. The applicant reported that, despite having documents confirming the legal formalisation of her gender transition, she was refused entry at the border, accused of using forged documents, and that the behaviour of the border control staff demonstrated signs of discrimination.

Also, within the framework of the Commissioner's proceedings, the circumstances of the dissemination of an information message on the official website of the SBGS regarding the applicant's case, the content of which contained signs of stigmatization, were verified. Following the Commissioner's response, the SBGS Administration edited the contested publication and subsequently deleted it.

It was also established that criminal proceedings had been initiated in connection with the border guards' allegations that the applicant had used forged documents. Following the pre-trial investigation, the allegations were refuted, the authenticity of all documents provided by the applicant was confirmed, and it was established that her actions did not constitute a criminal offence, consequently, the criminal proceedings were closed.

Taking into account the Commissioner's position and the explanations provided by the SBGS regarding the lawfulness of the applicant's actions, her right to freedom of movement was restored and she was able to cross the Ukrainian border.

By Order No. 116-25 of the National Agency of Ukraine on Civil Service dated 20 August 2025, amendments were made to the General Rules of Ethical Conduct for Civil Servants and Local Government Officials, pursuant to which civil servants and local government officials are obliged, in their conduct, to refrain from disseminating, condoning or participating in hate speech, namely any form of incitement, dissemination or justification of hatred and violence against a person or group of persons on the basis of certain characteristics, in particular gender, sexual orientation, race, ethnicity, nationality, language, social status, religion or other beliefs.

Crimes motivated by intolerance towards the LGBTIQ+ community, including physical assaults, threats and other forms of violence, remain a serious problem.

In 2025, the monitoring network of the 'Our World' Centre documented 37 cases of actions based on homophobia and transphobia by private individuals or groups. According to the OSCE classification, 22 cases were characterised as hate crimes, 14 as hate incidents, and 5 cases recorded manifestations of hate speech.

In 2025, the 'ALLIANCE.GLOBAL' NGO's Paralegal Hub recorded 327 appeals of rights violations from representatives of the MSM / LGBTQI+ community via the DataCheck Ukraine information and telecommunications system.

The most frequently reported incidents were threats/intimidation/blackmail (110), refusal to provide medical care or the provision of poor quality services (51), humiliating treatment (42), discrimination in employment/dismissal/mobbing (34), and the disclosure of personal information (30).

The lack of a legal framework for recognising same-sex partnerships remains a systemic issue with far-reaching negative legal consequences.

A separate solution is required to the problem of Ukraine's actual non-recognition of same-sex marriages/partnerships legally concluded by citizens of Ukraine either among themselves or with foreign citizens under the legislation of other states.

In 2025, positive developments were recorded in judicial practice regarding this matter. On 10 June 2025, the Desnianskyi District Court of Kyiv, whilst considering a case to establish a fact of legal significance, recognised the existence of a de facto marital relationship between two men who had previously married abroad.

The resolution of this issue should be viewed as a step towards ensuring equality, legal certainty and aligning Ukrainian legislation with European human rights standards, which does not require interference with the constitutional regulation of the institution of marriage, which is impossible under martial law.

9.1.4. Accessibility as a Component of the Realisation of the Right to Equality

Under martial law, issues of accessibility and barrier-free access are of particular relevance given the growing number of people with disabilities, people with limitations in daily functioning, and people who have been injured or temporarily limited in mobility as a result of hostilities. Insufficient accessibility of infrastructure, public services, information, and digital services complicated the realization of the right to equality and led to the actual restriction of access to rights and freedoms for certain categories of the population.

In 2025, the Commissioner received **268** reports regarding freedom from discrimination on the grounds of disability and health condition, as well as **155** reports regarding the right to an accessible environment (accessibility of facilities, services, transport, information and communications, etc.). In 2024, the number of such reports stood at 146 and 39 respectively. In 2023, 114 reports were received regarding freedom from discrimination on the grounds of disability and health condition, and 88 in 2022. The increase in the number of reports is due to the challenges facing the state arising from the Russian Federation's armed aggression against Ukraine, the dynamics of social processes, the level of legal awareness and the accessibility of protection mechanisms, and is also an indicator of growing trust in the institution of the Commissioner.

Analysis of the appeals shows that the issue of accessibility is relevant for all spheres of social relations.

The implementation of the right of persons with disabilities to participate in public affairs is an integral part of the formation of a responsible public policy that takes into account the interests of all groups.

Following a request from the head of the non-governmental organisation ‘Protection of the Rights and Freedoms of Disabled Soldiers’, the right of the organization representing the interests of persons with disabilities as a result of the Chernobyl disaster to participate in public affairs was restored.

The applicant is included in the Kyiv City Commissions, namely:

- the Commission for Determining the Status of Persons Affected by the Chernobyl Disaster and Other Categories of Citizens;

- the Commission for the Allocation of Living Space to citizens who, as a result of the Chernobyl disaster, have suffered from radiation sickness of any degree or have become disabled, to disabled children requiring special care, and to families who have lost a breadwinner from among persons classified as category 1, persons who have voluntarily relocated from areas contaminated by radioactive fallout as a result of the accident at the Chernobyl Nuclear Power Plant.

Furthermore, on the initiative of the Commissioner, the terminology in the name of the Commission for the Allocation of Living Space and in regulatory documents was brought into line with the UN Convention on the Rights of Persons with Disabilities, the laws of Ukraine “On Amendments to Certain Legislative Acts of Ukraine” and “On Amendments to Certain Legislative Acts of Ukraine Regarding the Use of the Term ‘Person with Disabilities’ and Derivatives Thereof”.

Ensuring the physical accessibility of infrastructure facilities is no less important. Realising the right of persons with disabilities and other people with reduced mobility to participate fully in public life requires the creation of conditions under which such facilities are safe, accessible and suitable for use without assistance or with minimal assistance. The inaccessibility of the physical environment is a systemic barrier that limits the realisation of the rights of persons with disabilities and other groups with reduced mobility.

As part of the Commissioner’s proceedings in response to a collective appeal from people with disabilities regarding the protection of the rights to an accessible environment, leisure and health improvement for people with disabilities and other groups with reduced mobility in the city of Odessa, and to support the operation of the ‘BEZMEZH’ Inclusive Beach, the Secretariat of the Commissioner held coordination working meetings with representatives of local authorities and municipal enterprises, and carried out monitoring visits to this beach. As a result of the measures taken, the preparation and proper functioning of the inclusive beach during the 2025 health season have been ensured.

In 2025, 36 cases of multiple discrimination against persons with disabilities were recorded, particularly in the field of implementation of state social support programmes. The Commissioner received appeals regarding the unlawful restriction of access for persons with disabilities to participate in the pilot project providing one-time state financial assistance, ‘Winter Support’, due to a combination of age criteria, health condition and the specific identification requirements for recipients.

A man with a disability addressed the Commissioner, the man had refused to use the RNOKPP due to his religious beliefs and receives social benefits via JSC 'Ukrposhta'. In 2024, the applicant was unable to receive the 'Winter Support' benefit via a post office due to not meeting the criteria, in particular regarding age, as set out in the Procedure for the implementation of the pilot project on the provision of one-time state financial assistance 'Winter Support' within the framework of the All-Ukrainian Economic Platform 'Made in Ukraine', approved by Resolution of the Cabinet of Ministers of Ukraine No. 952 of 20 August 2024. As a person who had refused the RNOKPP, he was not informed of the possibility of receiving the assistance through an authorised bank. At the time of the appeal to the Commissioner, the deadlines for compiling the lists for payments had expired.

As part of the response, proposals were submitted to the MSPFU and the Mineconomy regarding improvements to the programme's implementation mechanism, taking into account the principles of equality and non-discrimination. In 2025, by Resolution of the Cabinet of Ministers of Ukraine "Certain Issues Concerning the Implementation of the Pilot Project on the Provision of One-time State Financial Assistance 'Winter Support 2025'" dated 13 November 2025 No. 1443, age restrictions on receiving assistance via post offices were removed, and individuals who refused the RNOKPP were given the opportunity to apply directly at post offices. The applicant was explained the procedure and their right to receive 'Winter Support 2025' was ensured.

Protecting against discrimination and ensuring unimpeded access to services across various areas of social relations is one of the state's tasks in the context of digitalisation. Administrative or technical barriers in online services may create risks of discrimination, necessitating a response from the Commissioner as the national equality body. Due attention is required in cases where the specifics of the organisation of electronic services make equal access to them impossible for different individuals.

A woman practising law on a self-employed basis addressed the Commissioner regarding discrimination on the grounds of professional activity, following JSC 'Ukrposhta' restricting her right to use the parcel delivery service due to the inability to create a personal account for a self-employed person conducting independent professional activities, on the JSC 'Ukrposhta' website.

Following the Commissioner's response, changes have been made to the user registration procedure on the website of JSC 'Ukrposhta', specifically to provide users with the option to select their own status during registration: natural person, individual entrepreneur/self-employed person, or legal entity.

Ukraine is taking consistent steps to improve its national legislation on the implementation of the provisions of the UN Convention on the Rights of Persons with Disabilities, in particular with regard to the application of the principle of accessibility in the workplace and the creation of a barrier-free environment.

The Parliament has adopted the Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine Concerning the Right of Persons with Disabilities to Work” of 15 January 2025 No. 4219-IX, which, amongst other things, amends the Law of Ukraine “On the Fundamentals of Social Protection for Persons with Disabilities in Ukraine”:

1) the revised version includes, in particular, Article 2, which stipulates that discrimination on the grounds of disability includes an unjustified refusal to provide reasonable accommodation; Article 17 and stipulates that persons with disabilities in the field of employment have the right to reasonable accommodation in the workplace;

2) a new Article 17-1 has been added, the provisions of which establish the employer’s obligation to implement reasonable accommodation measures to ensure equal working conditions for persons with disabilities and set out a clear mechanism for state compensation of the associated costs. The established provisions combine an individual approach to the employee’s needs with procedural safeguards for the employer, thereby promoting the practical implementation of the principle of equality and non-discrimination in the field of employment.

Resolution No. 1308 of the Cabinet of Ministers of Ukraine dated 8 October 2025 approved the Procedure for carrying out alterations, repair works and retrofitting of premises to make them accessible to persons with disabilities, which includes a definition of the term ‘reasonable accommodation of the workplace’.

In accordance with the recommendations made by the Commissioner in the 2024 Annual Report, the Ministry of Social Policy, Family and Unity of Ukraine has approved the State Standard for the social service of consultancy on the adaptation of residential premises and amended the Classifier of Social Services, which has been supplemented with the relevant social service ‘Consultancy on the adaptation of residential premises’. The State Standard stipulates that this social service is provided in accordance with its requirements and the principles of accessibility, universal design and reasonable accommodation.

In December 2025, the Government of Ukraine approved the Principles, Criteria and Limits of Reasonable Accommodation and Universal Design, which apply to the provision of services in the health, social, educational and employment sectors, to the employment of persons with disabilities, and in other areas of public life. However, legislative changes are fragmentary.

In the concluding observations of the UN Committee on the Rights of Persons with Disabilities on the combined second and third periodic reports of Ukraine on the implementation of the Convention on the Rights of Persons with Disabilities (CRPD/C/UKR/CO/2-3) dated 2 October 2024, among other things, emphasized the need to systematically ensure equality and non-discrimination, the mandatory provision of reasonable accommodation as a guarantee of the realization of rights, ensuring accessibility, the development of community-based services and independent living, as well as effective access to education, employment, health care, social protection and participation in public and political life. The Committee emphasized the need to transition to a human rights model of disability and the introduction of a coordinated intersectoral approach. The Committee's recommendations directly link the issue of barrier-free access

to the full realization of specific rights guaranteed by articles 5–30 of the Convention on the Rights of Persons with Disabilities, and require comprehensive legislative regulation.

In this context, the Commissioner notes the importance of the work on developing the draft Law of Ukraine “On the Basic Principles of State Policy on the Creation of a Barrier-Free Environment in Ukraine”. Resolution No. 1126 of the Cabinet of Ministers of Ukraine dated 10 September 2025 established an Interdepartmental Working Group on the improvement of legislation regarding the creation of a barrier-free environment (hereinafter referred to as the IWG), which includes a Representative (Deputy) of the Commissioner for Equal Rights and Freedoms, Rights of National Minorities, Political and Religious Beliefs. The IWG is responsible for developing the draft law.

The draft law establishes a unified and clear framework for accessibility policy: specific deadlines; principles for policy development; areas of government action; and the roles of all stakeholders – from parliament to local authorities. At the center are human rights.

The draft Law provides for a separate role for the Commissioner as a subject of state policy for the formation of a barrier-free society with appropriate powers in this area, ensuring the consideration of human rights.

The issue of ensuring that sign language users can exercise their rights in various areas of social relations remains unresolved.

In 2025, by a decision of the Committee of the Verkhovna Rada of Ukraine on Humanitarian and Information Policy, a working group was established to develop a draft law on Ukrainian sign language, which would define the status, legal framework and procedures for the use of Ukrainian sign language. The working group included staff from the Commissioner’s Secretariat. However, no progress was made on this issue in 2025.

9.1.5. Equal Rights and Opportunities for Women and Men

During 2025, the Commissioner received 124 reports of gender-based discrimination and violence.

In addition, based on information identified in the media regarding suspected gender-based discrimination and violence, 16 letters of response were sent on the Commissioner’s own initiative.

According to the National Social Service of Ukraine, in 2025, regional and Kyiv City state (military) administrations received 51 appeals regarding gender-based discrimination (48 from women and 3 from men), in 2024, the number of such appeals stood at 15 (14 from women and 1 from a man). Due to the absence of a normative and legal act governing the recording of cases of gender-based discrimination, information is collected from regional and Kyiv City state (military) administrations using a form for operational reporting on identified cases of gender-based discrimination and measures taken.

According to the National Police of Ukraine, in 2025, 11 administrative protocols were drawn up under Article 173-6 (Gender-based violence) and 83 under Article 173-7 (Sexual harassment) of the CoAO of Ukraine.

Overcoming gender stereotypes, which have a negative impact on the perception of gender equality in society, remains relevant.

The SSUFSCP, in accordance with the Law of Ukraine “On Advertising”, is authorised to carry out state control measures to ensure compliance with advertising legislation, in particular regarding the protection of consumers’ rights in relation to advertising and the content of job advertisements (recruitment).

According to the SSUFSCP, in 2025, 100 cases of violation of the requirements of paragraphs 2 and 15 of part one of Article 8 of the Law of Ukraine “On Advertising” were considered on the facts of the dissemination of gender-discriminatory advertising, and decisions were made to impose fines in the total amount of 333,700 UAH, of which 277,500 UAH was paid.

Discriminatory advertising based on gender contributes to the formation of false perceptions about the gender roles of men and women in the minds of consumers of the information product. The systematic use of discriminatory advertising content creates favorable conditions for the spread and consolidation of biased views.

Furthermore, according to the SSUFSCP, 56 cases were considered in 2025 concerning the dissemination of job advertisements containing discriminatory requirements based on age and gender, for which decisions were made to impose fines in the total amount of 184,600 UAH, of which 154,200 UAH was paid.

In his activities, the Commissioner takes measures to restore the rights of individuals in the field of preventing the spread of discriminatory advertising, in particular on the basis of gender.

Following an appeal regarding the dissemination on the social media platform Instagram of an advertisement for the ‘Bezet’ clothing store, which contained elements of gender discrimination, following the Commissioner’s response, the Main Directorate of the SSUFSCP in Kyiv examined the case concerning a breach of advertising legislation by the distributor on the grounds of a violation of the requirements of Part 3 of Article 7 and Part 1 of Article 8 of the Law of Ukraine “On Advertising”.

Based on the results of the consideration of the case, penalties were imposed on the distributor in accordance with Article 27 of the Law of Ukraine “On Advertising”, and a decision was taken to suspend the distribution of the aforementioned advertisement in accordance with Article 26 of the Law of Ukraine “On Advertising”.

With the entry into force of the Law of Ukraine “On amendments to certain laws of Ukraine concerning the delineation of powers of central executive bodies in the areas of industrial safety, occupational health and safety, the handling of industrial explosives, state mining supervision, state supervision and control over compliance with legislation on labour and employment” dated 8 October 2024 No. 3992-IX, whereby the SSUFSCP is authorised to carry out state control measures regarding compliance with advertising legislation in the field of employment (in job advertisements), a legislative conflict has arisen regarding the application of a uniform approach to the imposition of fines and the bringing of the provisions of the Law of Ukraine “On Advertising” into line with the Law of Ukraine “On Administrative Procedure”.

Currently, a draft law of Ukraine entitled “On Amendments to the Law of Ukraine ‘On Advertising’ in connection with the adoption of the Law of Ukraine ‘On Administrative Procedure’” (reg. No. 14346 of 30 December 2025) is registered in the Verkhovna Rada of Ukraine, which aims to eliminate existing legislative and procedural discrepancies and ensure the consistency of state control measures to be implemented by the SSUFSCP in the field of advertising.

In March 2025, the Gender Equality Index in Ukraine was presented for the first time – an assessment of the progress made towards gender equality in Ukraine, carried out using EU methodology. The assessment was carried out across seven factors – domains: ‘Work’, ‘Money’, ‘Knowledge’, ‘Time’, ‘Power’, ‘Health’ and ‘Violence’. However, the results of the assessment for the ‘Violence’ domain were not included in the calculation of the overall Gender Equality Index, as it serves as an additional source of information. The aim of this domain is not to reduce gaps, but to completely eradicate violence as a factor of structural inequality that affects women’s position in other areas.

Following an appeal from a woman regarding unlawful acts committed against her whilst she was receiving treatment at the Municipal Non-Profit Enterprise ‘Regional Psychiatric Care Facility in the city of Berehove’, an inspection was conducted based on the Commissioner’s response. Based on the findings of the investigation, taking into account the information received, in particular the applicant’s written explanations, the Berehove District Police Department of the Main Directorate of the National Police in Zakarpattia region has initiated a pre-trial investigation in criminal proceedings on the grounds of a criminal offence under Part 1 of Article 125 (Intentional Causing of Minor Bodily Harm) of the Criminal Code of Ukraine.

The Commissioner has identified cases of violence against women in connection with their professional activities.

During media monitoring, reports were identified of unlawful acts which were likely committed with the aim of undermining the journalist’s honour and dignity and infringing upon her privacy. Following the Commissioner’s response, a pre-trial investigation has been launched in criminal proceedings on the grounds of a criminal offence under Part 1 of Article 182 (Violation of privacy) of the Criminal Code of Ukraine.

An analysis of appeals and the findings of monitoring activities indicate that issues relating to gender-based discrimination and gender-based violence require unified mechanisms and approaches for the consideration of complaints and the implementation of response measures by state authorities and OMS.

In 2025, the MSPFU, in collaboration with the Commissioner and other state authorities, developed a draft procedure for responding to cases of gender-based discrimination, which sets out in detail the existing mechanism for protecting victims of gender-based discrimination, gender-based violence and sexual harassment. At the time of preparing the Commissioner’s Annual Report for 2025, the Procedure for Responding

to Cases of Gender-based Discrimination was approved by Resolution of the Cabinet of Ministers of Ukraine No. 226 of 18 February 2026.

However, institutionalising the principle of equal rights and opportunities for women and men involves not only the adoption of normative and legal acts, but also a systematic assessment of the extent to which relevant standards are integrated into internal processes and practices. One of the effective tools for such an assessment is a gender audit – a comprehensive analysis of policies, procedures, human resource (HR) approaches and management decisions aimed at determining the extent to which the gender component is taken into account.

In particular, in 2025, a gender audit was conducted for the first time at the Commissioner's Secretariat as part of cooperation with the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women).

The Operational Plan of Measures for the Implementation in 2025–2027 of the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030, approved by Order of the Cabinet of Ministers of Ukraine No. 752-r of 12 August 2022, provides for the conduct of gender audits in central executive bodies, regional and Kyiv city state administrations (military administrations) to identify hidden gender discrimination, with the aim of collecting and publishing data to monitor progress towards gender equality.

At the same time, it is important to ensure the improvement of internal mechanisms for preventing, responding to and combating gender-based discrimination and gender-based violence in Ukraine's security and defence sector.

In 2025, the Verkhovna Rada of Ukraine registered draft laws aimed at addressing this issue, which have been supported by the Commissioner.

The draft Law of Ukraine “On Amendments to the Disciplinary Statute of the Armed Forces of Ukraine and the Statute on Internal Service of the Armed Forces of Ukraine regarding the improvement of mechanisms for ensuring military discipline, preventing and countering manifestations of discrimination and sexual harassment” (reg. No. 13037 of 21 February 2025) has been adopted as a basis and prepared for the second reading, which provides for the improvement of mechanisms for the prevention, prompt response to and countering of sexual harassment, manifestations of gender-based discrimination among servicemen, gender-based violence, offences against sexual freedom and sexual integrity within the Armed Forces of Ukraine.

In addition, a draft law of Ukraine entitled “On amendments to the Disciplinary Statute of the National Police of Ukraine regarding the settlement of the issue of prevention of gender discrimination and sexual harassment in the workplace” has been submitted to the Verkhovna Rada of Ukraine (registration No. 14036 of 12 September 2025).

9.2. Prevention of Domestic Violence

9.2.1. Violations of the Right of Victims of Domestic Violence to Assistance

The right to timely and effective assistance is fundamental for victims of domestic violence and is enshrined in Ukrainian legislation, in particular in the Law of Ukraine “On the Prevention and Combating of Domestic Violence” (hereinafter referred to as the Law of Ukraine No. 2229-VIII of 7 December 2017). This right includes access to medical, psychological, social and legal assistance, as well as protection against further violence.

During 2025, the Commissioner received 344 appeals regarding violations of the rights of victims of domestic violence. By comparison, 258 appeals on such matters were received in 2024. The increase in the number of appeals highlights existing shortcomings in the functioning of the system for protecting victims of violence, as at the national level there has been a decrease in the number of appeals regarding domestic violence from 181,904 in 2024 to 97,592 in 2025 (according to data from the National Social Service of Ukraine).

However, the results of monitoring and the analysis of appeals indicate systemic violations in the realisation of this right.

The main problems remain the delayed response from the responsible authorities, limited access to specialised support services for victims of domestic violence, insufficient inter-agency cooperation, and inadequate information provided to victims regarding the types of assistance available. In a number of cases, the lack of crisis rooms, shelters or professional psychological and social services actually deprives victims of the opportunity to receive the necessary support, particularly in rural areas and small communities.

Violations of the right to assistance lead to the re-victimisation of victims, exacerbate the physical and psychological consequences of violence, and erode trust in state institutions. Addressing these violations requires a systematic approach, including enhanced coordination between stakeholders, the development of a network of specialised services, and ensuring real access for victims to quality assistance.

During monitoring visits in 2025, shortcomings were identified in the functioning of specialised support services for victims of domestic violence.

During a monitoring visit to the Shelter for victims of domestic violence and/or gender-based violence, a number of shortcomings were identified in the organisation of support for victims of domestic violence. Following the monitoring visit, a report was drawn up containing recommendations for addressing the shortcomings identified at the shelter. In accordance with the Commissioner’s recommendations, a number of measures were taken without delay, namely:

- amendments were made to the shelter’s regulations to standardise the categories of persons who can receive services at the shelter;*
- personal files for recipients of the shelter’s social services were ensured in accordance with legal requirements;*
- the post of a full-time psychologist was introduced at the shelter;*
- training and professional development for shelter staff were ensured;*
- equipment has been purchased to enable people with disabilities staying at the shelter to prepare their own meals;*

– an agreement has been signed with the ‘Barrier-Free Ukraine’ Resource Centre for the production of mnemonic cards, information boards in Braille and two tactile paving to assist people with disabilities and other people with reduced mobility within the shelter;

– cooperation has been established with charitable and civil society organisations through the signing of memoranda of understanding to attract humanitarian assistance for people in shelters.

According to the results of the monitoring visit, it was possible to significantly improve the state of observance of the rights of victims of domestic violence to receive guaranteed assistance, including shelter services.

9.2.2. Violation of the Right to Information of Victims of Domestic Violence

The right to receive comprehensive, accessible and timely information is a key prerequisite for the realisation of other rights of victims of domestic violence, in particular the right to protection, assistance and safety. However, there are documented cases of victims not being properly informed about their rights, the available protection mechanisms, the procedure for addressing the competent authorities and the support services available, which limits the ability to respond effectively to violence.

During the monitoring of the media and social networks regarding the state of observance of human rights in all spheres of social relations, carried out by the Commissioner, information about the commission of domestic violence was revealed.

Media reports indicate that a man, whilst under the influence of alcohol, systematically provoked conflicts with his sister. Police officers had on several occasions conducted preventive discussions with the perpetrator and issued urgent restraining orders. Despite the measures taken, the man continued to commit domestic violence.

The Commissioner immediately sent a request to the Regional State Administration to verify the facts of the domestic violence and take appropriate response measures.

Only after the Commissioner's response did the members of the commission, consisting of representatives of OMS, visit the victim's residence, assess the family's needs, explain their rights, and provide social counseling and socio-psychological support.

The Commissioner’s Secretariat carries out systematic activities aimed at ensuring victims’ right to information. As part of the All-Ukrainian campaign ‘16 Days Against Violence’ in 2025, analytical, educational and explanatory materials were published daily on the Commissioner’s social media channels, aimed at raising public awareness of various forms of violence, protection mechanisms and contemporary challenges in the field of human rights.

A mobile app called ‘Hidden SOS Button’ is available in Ukraine for women who have suffered domestic violence. According to the MIA of Ukraine, based on data from the ‘Information Portal of the National Police of Ukraine’ information and communication system, 32 reports were received by the police via this mobile app from 17 applicants in 2025. In 29 cases, the reports were sent to the police after the applicants

pressed the “SOS” emergency button, in a further three cases, they were sent as text messages. The number of reports received via this channel is steadily decreasing, as in 2024 the number of such reports stood at 41.

Following the response to the reports by units of the National Police of Ukraine, reports were drawn up regarding administrative offences under parts one, two and three of Article 173-2 of the CoAO of Ukraine, and urgent restraining orders were issued against the perpetrators.

However, compared to the total number of appeals concerning cases of domestic violence, the small number of reports submitted via this mobile app may indicate a low level of public awareness regarding the possibility of using it.

Ukraine had in place a State Social Programme for the prevention and combating of domestic violence and gender-based violence until 2025, approved by Resolution No. 145 of the Cabinet of Ministers of Ukraine dated 24 February 2021 (hereinafter referred to as the Programme). This Programme was aimed at improving mechanisms for preventing and combating domestic violence and gender-based violence in the context of decentralisation, through the implementation of international standards, compliance with national legislation and enhancing the effectiveness of cooperation between central and local authorities, OMS and the public.

Despite the recommendation made in the previous period to develop a draft State Social Programme for the prevention and combating of domestic violence and gender-based violence until 2030, taking into account the need to strengthen measures to disseminate information about domestic violence, the draft document was not submitted to the Commissioner for approval.

The absence of such a programme significantly limits the scope for strategic planning and the provision of adequate funding for measures to combat domestic violence and gender-based violence at national and local levels.

9.2.3. Bringing Perpetrators to Justice

Under Article 10 of the Law of Ukraine No. 2229-VIII of 7 December 2017, the powers of the competent units of the National Police of Ukraine in the field of preventing and combating domestic violence include, in particular, identifying instances of domestic violence and responding to them in a timely manner, receiving and considering applications and reports of domestic violence, informing victims of their rights, the measures and social services available to them, issuing urgent restraining orders against perpetrators, placing perpetrators on a preventive register and carrying out preventive work with them in accordance with the procedure established by law, etc.

According to information from the National Police of Ukraine, during 2025, police officers identified 94,855 administrative offences under Article 173-2 of the CoAO of Ukraine and identified 72,284 individuals who committed them. These figures indicate a significant number of recorded cases of administrative offences, confirming the relevance of the issue of combating such acts and the need to further strengthen preventive measures.

Citizen P. addressed the Commissioner, suffering from systematic physical and psychological violence perpetrated by her adult daughter. Under such conditions, the woman began to fear for her life and begged for help.

The Commissioner immediately sent requests to the Main Directorate of the National Police and the RMA for urgent intervention and the taking of necessary measures.

Following the Commissioner's response, police officers visited the applicant's place of residence, where a risk assessment was carried out and a report of an administrative offence was drawn up against the perpetrator under Article 173-2 (Committing domestic violence) of the CoAO of Ukraine. The perpetrator was placed on a preventive register to monitor her behaviour.

In addition, competent authorities carried out a joint visit to the victim's family. Following a needs assessment, the family was registered as a family facing difficult life circumstances. Social work specialists from the 'Centre for Social Services' provided information and counselling services and offered social support to the family.

The state is obliged to ensure an effective response to cases of domestic violence, to bring the perpetrators to justice and to provide assistance to victims.

According to the Office of the Prosecutor General, 8,127 criminal offences related to domestic violence were recorded in 2025. As a result of the pre-trial investigation, in 7,373 cases, persons were notified of suspicion, and 7,163 criminal proceedings were sent to court. In 1,838 criminal offenses, proceedings were closed, and in 914 cases, a decision to terminate or suspend the proceedings had not been made by the end of 2025. These indicators indicate an active response by law enforcement agencies to such crimes, but they also indicate the need to further strengthen preventive measures and control over compliance with procedural deadlines and the completeness of the pre-trial investigation.

Criminal offenses related to domestic violence resulted in 7,456 victims, of whom 278 died. These figures indicate the serious social danger of this crime and the need to strengthen preventive work, timely response to reports of domestic violence, and assistance to victims.

Progress is being made in the investigation of criminal offences related to domestic violence, as the majority of cases are being referred to court. However, the significant number of victims of such offences and cases resulting in fatalities indicate that the problem remains serious. It is necessary to reduce the number of unresolved proceedings by improving the effectiveness of pre-trial investigations.

Despite the active work of law enforcement agencies and some progress in combating domestic violence, this problem remains widespread and socially dangerous. The significant number of administrative and criminal offences indicates that domestic violence remains a serious challenge for Ukrainian society.

To improve the effectiveness of combating domestic violence, it is important to strengthen inter-agency cooperation between law enforcement agencies, social services, health and education institutions, and local communities. In addition, it is important to continue to improve the skills of investigators to ensure a full, impartial, and timely investigation of each case.

A citizen, Ms M., addressed the Commissioner regarding a violation of her right to protection from domestic violence.

In her appeal, the woman stated that her ex-husband systematically subjected her to psychological abuse, which manifested itself in insults and threats of physical violence against her and their child.

The applicant also reported that she had repeatedly addressed law enforcement agencies, but the situation of domestic violence continued.

Only following the Commissioner's response were the information regarding the applicant's appeal entered into the Unified Register of Pre-trial Investigations on the grounds of a criminal offence under Article 126-1 (Domestic Violence) of the CC of Ukraine. In addition, a commission comprising representatives of the authorities, law enforcement agencies and a paediatrician visited the place of residence of the victim and informed her of her rights and the social services available to her. The applicant was also advised on safety measures in cases of domestic violence and informed of the possibility of accommodation in a crisis centre.

Following the Commissioner's response, the Ukrainian citizen's right to protection from domestic violence has been restored.

Effective counteraction to domestic violence is possible only with a comprehensive approach that combines legal, social, psychological and educational measures aimed at both protecting victims and preventing new cases of domestic violence.

A citizen, Ms S., who had been subjected to systematic domestic violence over a long period of time, addressed the Commissioner. The applicant repeatedly reported incidents of domestic violence to the police and asked for her perpetrator to be brought to justice. However, law enforcement officers failed to respond appropriately to her reports.

As a result of the Commissioner's response, an internal investigation was ordered, which confirmed the facts of a violation of service discipline by a community police officer and the head of the community relations sector of one of the district police departments. Disciplinary measures were applied to the aforementioned police officers.

9.2.4. Systemic Violations in Ensuring the Completion of Programmes for Perpetrators

In 2025, the total number of individuals referred to perpetrator programmes was **3,133**, of whom only **1,108** completed such programmes.

As part of parliamentary oversight of the completion of perpetrator programmes by individuals who have committed domestic violence, relevant requests were sent to regional and Kyiv City military administrations. Analysis of the data received revealed that in 23 regions of Ukraine, specialists responsible for implementing these programmes underwent specialised training during 2025. The highest number of individuals who underwent such training was recorded in the Dnipropetrovsk, Chernihiv and Cherkasy regions. In the Vinnytsia region, no training of specialists took place during the year. By

the end of 2025, the total number of specialists involved in the implementation of programmes for perpetrators stood at 909, which is almost twice as many as in 2024.

However, there is a large discrepancy in the number of such specialists in different regions of Ukraine. For example, in the Dnipropetrovsk region, 78 people implement programmes for offenders, while in the Zaporizhia region, only 2 people implement programmes for offenders.

According to the law, police officers must carry out a range of measures with a perpetrator who is on a preventive register, aimed at preventing the recurrence of domestic violence. This includes conducting preventive discussions, monitoring compliance with urgent or restraining orders, and referring the perpetrator to programmes for perpetrators.

Despite the existence of mechanisms clearly defined in legislation to prevent repeat incidents of domestic violence, their implementation in practice remains insufficiently effective. This, in turn, leads to serious consequences, in particular the commission of repeat criminal offences, and highlights the need to strengthen oversight of law enforcement agencies' activities in the field of preventing and combating domestic violence.

A significant proportion of cases of domestic violence remain without an adequate response from state and law enforcement agencies, which indicates insufficient work by responsible entities.

During media monitoring, information was revealed about the commission of physical violence. A man stabbed his wife and 9-year-old daughter, from which they died on the spot. Criminal proceedings have been initiated under Part Two of Article 115 (Intentional Murder) of the CC of Ukraine.

In order to find out whether the specified man is or has been on preventive registration under the category of 'perpetrator', as well as whether there have been reports of domestic violence in this family in recent years, a request was immediately sent to the National Police.

As a result of the Commissioner's response, it was established that the man had been on the preventive register under the category of 'perpetrator' from 22 December 2022 to 4 October 2025 (until the commission of the criminal offence). Furthermore, over the past two years, 5 reports of domestic violence concerning this family had been received.

Despite the perpetrator being on preventive register and receiving reports of domestic violence, existing prevention mechanisms did not work, leading to the deaths of family members.

9.3. Sexual Violence Related to the Russian Federation's Armed Aggression against Ukraine

Despite the adoption of the Law of Ukraine "On legal and social protection of persons affected by sexual violence related to the armed aggression of the Russian Federation against Ukraine, and the provision of urgent interim reparations to them"

(hereinafter referred to as the Law of Ukraine No. 4067-IX of 20 November 2024), which sets out the fundamental principles of state policy in the field of legal and social protection for persons affected by sexual violence related to the armed aggression of the Russian Federation against Ukraine, and which came into force on 18 June 2025, there are currently no effective mechanisms for its implementation.

The final provisions of the Law of Ukraine No. 4067-IX of 20 November 2024 established a six-month deadline for the Cabinet of Ministers of Ukraine to develop and adopt the necessary normative and legal acts. Despite the Commissioner's repeated appeals to the responsible executive authorities and informing them about the intensification of activities in this area, during 2025, none of the key by-laws entered into force.

In particular, the procedure for interaction between entities implementing measures in the field of legal and social protection of victims has not been approved, the procedure for recognizing a person as a victim of the CRSV has not been determined, as well as the mechanism for assigning and paying urgent interim reparations. The processes of developing and approving relevant draft normative and legal acts remain at the stage of finalization, inter-agency discussion, or preparation for submission.

The absence of approved mechanisms for implementing the Law of Ukraine No. 4067-IX of 20 November 2024 actually makes the practical application of its provisions impossible, deprives victims of the CRSV of access to state-guaranteed services, rehabilitation and urgent financial assistance, and also creates the risk that the adopted legislation will be merely formal in nature, without real impact on the restoration of the victims' rights.

A Representative (Deputy) of the Commissioner for Equal Rights and Freedoms, Rights of National Minorities, Political and Religious Beliefs was a member of the Pilot Project on the Provision of Urgent Interim Reparations to Individuals, which was implemented by the Global Fund for Survivors of Violence. During the implementation of the Pilot Project, 1,208 appeals were received from individuals who had likely been affected by CRSV, and the payment of urgent interim reparations was approved for 1,080 affected individuals, including men (726), women (331) and children (23).

Among state bodies/institutions, the largest number of appeals from individuals wishing to receive urgent interim reparations under the Pilot Project was forwarded by the Commissioner's Secretariat.

However, the implementation of the Pilot Project has merely outlined a possible direction for the development of a system to provide victims of CRSV with the full range of assistance and services.

A citizen, Ms S., addressed the Commissioner with a request to assist in obtaining state assistance for herself and her minor child as victims of the CRSV.

Within the framework of this response, the Commissioner addressed the MSPFU regarding the available mechanisms for obtaining such assistance. The Ministry informed that despite the entry into force of the Law of Ukraine No. 4067-IX of 20 November 2024, which sets out the principles of state policy regarding the protection of victims of the CRSV, the mechanisms for its implementation

are actually not functioning due to the absence of the necessary by-laws, which are still at the drafting stage.

This case demonstrates that, despite the existence of legislative guarantees, the state has failed to ensure their practical implementation. As a result of the absence of defined procedures, the applicant and her child are actually deprived of access to the rights provided for, in particular, to urgent financial assistance, rehabilitation and specialized support.

9.4. Trafficking in Human Beings

9.4.1. Violations of the Rights of Victims of Trafficking in Human Beings Regarding the Determination of Their Status as Victims of Trafficking in Human Beings

The Russian Federation's full-scale military invasion of Ukraine has led to a mass exodus of people abroad and increased their vulnerability to falling victim to human trafficking. According to estimates by international organisations, over 6,75 million people have been forced to leave Ukraine and seek protection abroad. In 2025, a study by the United Nations Office on Drugs and Crime (UNODC), was presented, focusing on trafficking in persons and smuggling of migrants in the context of the displacement caused by the war in Ukraine. The report notes that the mass displacement of the population has led to an increased risk of falling victim to human trafficking and has complicated the processes of identifying victims and providing them with appropriate protection.

Displaced persons face heightened risks of exploitation, particularly due to limited access to information and language barriers. These factors complicate the timely identification of victims of human trafficking and the granting of appropriate status to them in host countries, which also limits such persons' access to protection and assistance mechanisms.

As part of the implementation of state policy on combating human trafficking, the MFA and FDU play a vital role in safeguarding the rights and interests of Ukrainian citizens abroad. In this context, a positive practice is the provision of training for staff of diplomatic missions on identifying and assisting victims of human trafficking as part of professional development programmes prior to their deployment on long-term missions abroad.

Between 2022 and 2025, as part of a special annual professional programme run by the State Educational and Scientific Institution of Postgraduate Education 'Hennadii Udovenko Diplomatic Academy of Ukraine at the Ministry of Foreign Affairs of Ukraine' aimed at enhancing the professional skills of personnel on long-term secondment to FDU, lectures were delivered on the topic: 'Identification and Assistance to Victims of Human Trafficking'. Under this programme, the following numbers of participants completed the training: in 2022 – 37 people; in 2023 – 29 people; in 2024 – 35 people; in 2025 – 23 people.

However, an analysis of the available information suggests that the reach of such training is limited. The number of staff at diplomatic missions who have undergone

relevant training in recent years is negligible compared to the total number of staff at Ukraine's diplomatic and consular missions who perform functions abroad and may potentially encounter cases of human trafficking.

Under these circumstances, the level of engagement and awareness among staff at diplomatic missions regarding countering human trafficking remains insufficient to ensure a systematic and effective response to cases of human trafficking, particularly with regard to the timely identification of victims and their referral to the appropriate support services.

The Commissioner is currently considering an appeal from a citizen, Ms T., regarding her daughter's alleged involvement in human trafficking abroad.

In her appeals, the woman stated that her daughter is suffering psychological, physical and sexual abuse. It is believed that she is being held against her will by a criminal organisation involved in the sexual exploitation of women in Europe.

The Commissioner has sent requests to the National Police to verify the facts regarding the alleged involvement of the individual in human trafficking.

Following the Commissioner's response, criminal proceedings have been initiated on the grounds of a criminal offence under Part 1 of Article 149 (Human Trafficking) of the CC of Ukraine.

In 2025, UN Women in Ukraine and the non-governmental organisation 'La Strada-Ukraine', with the participation of staff from the Commissioner's Secretariat, prepared an analytical report on human trafficking for sexual exploitation in Ukraine entitled: 'The increased vulnerability of women and girls related to the war of the Russian Federation against Ukraine and the use of cyberspace by human traffickers'. The findings of the study indicate the growing role of the internet and social platforms as tools for the recruitment and exploitation of victims of human trafficking. Of particular concern is the proliferation of online advertising, including advertisements of a sexual nature, which effectively facilitate the commercialisation of the exploitation of victims of human trafficking. The current version of Article 149 (Human trafficking) of the CC of Ukraine does not provide a clear definition of such acts, which complicates their effective prosecution and creates a gap in the mechanisms for bringing perpetrators to justice.

The study also found that the use of information and communication technologies in the context of human trafficking is systematic in nature and, in some cases, constitutes an independent means of exploitation and not just a secondary element of the crime of human trafficking. The absence of a corresponding element in the list of types of exploitation defined by current national legislation limits the possibilities of proper legal assessment of modern forms of human trafficking and reduces the ability of the state to adequately respond to the challenges associated with the digitalization of human trafficking.

9.4.2. Violation of the Right to Information Regarding the Possibility of Being Granted the Status of a Victim of Human Trafficking

Throughout 2025, there has been a sharp increase in the number of people granted the status of victims of human trafficking. According to official data from the National Social Service of Ukraine, in 2025, **485** people were granted the status of victims of

human trafficking, all of whom were Ukrainian citizens. It is worth noting that in 2024 the number of such individuals stood at 182, in 2023 at 118, and in 2022 at 47.

According to information from the Office of the Prosecutor General, during 2025, 113 people were recognised as victims of criminal offences under Article 149 (Human trafficking) of the CC of Ukraine. In 2024, 55 people were registered as victims of such criminal offenses, in 2023 - 91 people, in 2022 - 66 people.

An adequate level of awareness is a key prerequisite for the timely self-identification of victims of human trafficking and their seeking of protection and state assistance.

During media monitoring, information was revealed about the involvement of individuals in human trafficking. The media report stated that law enforcement officers had exposed 3 perpetrators who had involved 31 individuals in labor exploitation, taking advantage of their vulnerable state.

The Commissioner immediately sent requests for response measures to be taken and emphasised the need to organise the provision of necessary assistance to the victims.

As a result of the Commissioner's response, the National Social Service of Ukraine granted 8 victims the status of victims of human trafficking. This status entitles them to receive medical, psychological, social, legal and other necessary assistance free of charge, including a one-time financial assistance in the amount of three subsistence minimums.

9.4.3. Violation of the Procedure for Interaction between Entities Implementing Measures to Combat Human Trafficking

The findings of monitoring visits and off-site inspections have revealed systemic shortcomings in the mechanisms for interaction between the entities involved in implementing state policy on combating human trafficking. The shortcomings identified point to a lack of proper coordination and a systematic approach to the planning and implementation of relevant measures at regional level.

One of the key problems is the irregular holding of meetings of consultative and advisory bodies, as well as the failure to include issues related to combating human trafficking on the agendas of such meetings. This makes it impossible to conduct regular analysis of the situation, identify problems in a timely manner and develop coordinated solutions, which negatively affects the effectiveness of inter-agency cooperation.

Of particular concern is the lack of actual activity of advisory and consultative bodies under local state administrations for a long time, which indicates a formal approach to the performance of their functions. This situation leads to fragmentation of the actions of entities, a decrease in the quality of coordination, and the risks of untimely provision of guaranteed state assistance to victims of human trafficking.

Furthermore, there have been instances where minutes of meetings of consultative and advisory bodies were not provided in response to requests from the Commissioner. The lack of access to relevant documentation makes it impossible to fully assess the state of inter-agency coordination, the transparency of decision-making, and respect for the rights of victims.

Overall, the identified violations indicate inadequate organisation of interaction between entities in the field of combating human trafficking and require the immediate implementation of systemic measures aimed at restoring effective coordination, ensuring the regular functioning of consultative and advisory bodies, and enhancing accountability for the performance of specific functions in the field of protecting the rights of victims of human trafficking.

In addition, current legislation on combating human trafficking assigns key responsibilities to local state administrations, particularly regarding their involvement in the procedure for determining the status of a victim of human trafficking. However, OMS are not equipped with similar tools, which limits their functional influence within the early detection system for victims and may negatively impact the efficiency and timeliness of formalising the relevant status.

Taking into account that it is the OMS that operate at the level of territorial communities, have direct contact with the population and possess information about socially vulnerable groups, their lack of relevant competences limits their ability to respond promptly to potential cases of human trafficking and exploitation. With a view to strengthening inter-agency cooperation among entities implementing measures to combat human trafficking, it would be appropriate to grant OMS the relevant powers, in particular to conduct interviews with persons who consider themselves victims of human trafficking, as well as to prepare and compile the necessary documents for deciding whether to grant or refuse to grant the status of a victim of human trafficking.

This approach will help to improve the coordination of actions between the relevant authorities, streamline procedures and ensure that victims have more timely access to the protection and support mechanisms provided for by law.

During media monitoring, it was discovered that a man had been exploiting a person in a wheelchair who found themselves in difficult circumstances – he kept them at his home, took them to public places and forced them to beg for money.

The Commissioner immediately sent a request to the RMA regarding the implementation of response measures and emphasised the need to organise the provision of guaranteed assistance to the victim.

As a result of the Commissioner's response, the National Social Service of Ukraine granted the victim the status of a victim of human trafficking, entitling them to receive medical, psychological, social, legal and other necessary assistance free of charge, including a one-time financial assistance.

In addition, the victim was placed in a social rehabilitation centre and provided with hot meals, clothing, personal hygiene items, etc.

9.5. Right to Freedom of Thought and Religion

Freedom of thought and religion is a fundamental human right, and even in times of war, the state is obliged to ensure the protection of religious communities, their spiritual heritage and their right to freely practise their faith.

During 2025, the Commissioner received 58 appeals regarding alleged violations of religious rights and freedoms.

A particular area of concern regarding the right to freedom of thought and religion remains the mass destruction and damage to religious buildings resulting from the Russian Federation's armed aggression against Ukraine. Such actions are systematic in nature and lead not only to material losses but also to a significant restriction on the ability of religious communities to conduct worship services, receive religious education and carry out spiritual activities.

According to the monitoring project 'Religion on Fire', 742 religious sites have been destroyed or damaged. Specifically, 470 Orthodox religious sites (395 belonging to the Ukrainian Orthodox Church, 75 to the Orthodox Church of Ukraine), 194 Protestant, 22 Jewish, 31 Greek and Roman Catholic, 7 Muslim, 18 buildings of other religions, and 11 religious educational institutions. Thus, the destruction affected religious buildings of various denominations and faiths, which testifies to the significant scale of losses to Ukraine's spiritual and cultural heritage.

The regions that suffered the greatest losses were those that became the epicentres of hostilities and temporary occupation: the Luhansk, Donetsk, Kharkiv, Kherson and Kyiv regions.

These figures are not exhaustive for a number of reasons: the inability to access a building or even obtain information about its condition, as it is located in an area under constant shelling or hostilities, or is situated in temporarily occupied territory.

Alongside the consequences of the Russian Federation's armed aggression, a separate area of concern regarding the right to freedom of thought and religion remains the restoration of religious communities' rights to religious property.

Despite the existence of constitutional guarantees of freedom of thought and religion, as well as Ukraine's international obligations, in practice religious communities continue to face significant difficulties in exercising their right to use and possess places of worship.

In this context, the situation surrounding the transfer of St Nicholas's Cathedral in Kyiv for use by the religious community of the Roman Catholic Church is illustrative.

In 2023, the head of the religious community of St Nicholas's Parish addressed the Commissioner to facilitate the implementation of the religious community's right to use the St Nicholas's Cathedral in Kyiv. Despite the instructions from the President of Ukraine and the memorandum signed with the MinCult, the issue of the transfer remained unresolved, and the building continued to be used as a concert venue by the National House of Organ and Chamber Music.

The Commissioner sent requests to the relevant state bodies to ascertain the state of play and create the conditions for the transfer of the building. The information received revealed that the memorandum provided for the transfer of the Cathedral to the community no later than June 2022, and that implementation was being delayed by the execution of the Cabinet of Ministers of Ukraine's order regarding the relocation of the National House of Organ and Chamber Music.

In 2025, the Commissioner received a new appeal from parishioners regarding the delay in the enforcement of court decision on the transfer of the building. To ascertain the reasons for the delay, the Commissioner addressed the MinCult. Additionally, a request was sent to the DESS regarding the measures taken to facilitate the enforcement of the

court decision and to seek clarification from the MinCult on the procedure for the transfer of the religious building.

A monitoring visit to the Cathedral proved to be a key element in safeguarding the rights of the religious community. During the visit, the building's critical technical condition was documented, posing potential risks to the life and health of those attending religious services. Based on the monitoring results, the Commissioner provided recommendations to the MinCult and civil protection authorities regarding the need for urgent measures. This served as an additional argument in favour of transferring the church to the religious community as the user, who is interested in its preservation and safe operation, as soon as possible.

Direct communication with the religious community became a separate important focus: representatives of the Commissioner's Secretariat were in constant contact with the religious community, met repeatedly with the rector, and discussed existing problems, risks and possible legal mechanisms for resolving them. These meetings made it possible to document not only the legal but also the practical aspects of the violation of the right to freedom of religion.

In December 2025, the Government of Ukraine adopted a resolution updating the mechanism for the transfer of religious buildings, including the possibility of extending the terms of use and detailed grounds for their transfer to religious communities. This decision creates transparent and long-term conditions for religious communities, removing legal barriers and bureaucratic difficulties that had hindered the enforcement of court decisions. All comments from the Commissioner have also been taken into account, and unnecessary bureaucratic restrictions on the conclusion of utility service contracts have been removed.

In January 2026, the MinCult transferred St Nicholas's Cathedral in Kyiv to the Catholic community for use free of charge.

9.5. Protection of the Rights of National Minorities (Communities) and Indigenous Peoples of Ukraine

With the start of negotiations in June 2024 on Ukraine's accession to the EU, the framework for the protection of the rights of national minorities (communities) underwent significant regulatory changes. The result of joint efforts by state authorities, with the participation of staff from the Commissioner's Secretariat and in constant communication with the European side, was the adoption on 14 May 2025 by the Government of Ukraine of the Roadmap on the Rule of Law.

A separate sphere of the 'Fundamental Rights' block of this Roadmap includes a series of measures requiring the alignment of Ukraine's national legislation and existing practices in the field of national minorities (communities) in Ukraine with EU legislation.

The Government of Ukraine has also approved an Action Plan on the Protection of the Rights of Persons Belonging to National Minorities (Communities) in Ukraine, which contains a wide range of obligations for state authorities in the areas of non-discrimination, combating hate speech, the use of the languages of national minorities (communities), education in the languages of national minorities (communities), as well

as the introduction of updated mechanisms for implementation, reporting and the identification of responsible institutions.

The set of mentioned policy and programme documents, although they create an extensive list of European integration tasks for Ukraine, the implementation of current national legislation in the field of national minorities (communities), especially in the regional context, as well as ensuring practical access to the use of their rights and freedoms, are not sufficiently effective and require greater efforts from state authorities and OMS.

9.5.1. Implementation of the Law of Ukraine “On National Minorities (Communities) of Ukraine”

The implementation of the Law of Ukraine “On National Minorities (Communities) of Ukraine” is aimed at ensuring equal rights and freedoms for persons belonging to national minorities (communities), in accordance with the Constitution of Ukraine and the state’s international obligations.

During 2025, the Commissioner received 27 appeals relating to possible violations of the linguistic, cultural and information rights of persons belonging to national minorities (communities), which indicates the existence of gaps in the practical implementation of the Law.

In April 2025, the Commissioner, with the support of the Council of Europe, held a public consultation on the status of implementation of the recommendations contained in the Commissioner’s Special Report on the observance of the rights of national minorities (communities) and indigenous peoples in the conditions of the armed aggression of the Russian Federation against Ukraine, and presented a report on the status of implementation of the recommendations provided in the Special Report to state authorities. The event was attended by representatives of state authorities, national minorities (communities) and indigenous peoples of Ukraine, experts and international partners.

According to the results for 2025, out of 75 recommendations, 51 have been implemented (68%), 10 are in the process of being implemented (13%), and 14 remain unimplemented (19%), which means that 81% of the recommendations have been implemented or are in the process of being implemented, however, this does not resolve the existing systemic issues.

In collaboration with the Office of the OSCE High Commissioner on National Minorities, the Commissioner implemented the project ‘Toolkit for Monitoring the Rights of National Minorities’ throughout 2025. As part of this project, methodological guidelines were developed for conducting monitoring visits by staff of the Commissioner’s Secretariat on the observance of the rights of national minorities (communities) and indigenous peoples of Ukraine. They were also tested through monitoring visits to regional military administrations, OMS, general and preschool education institutions, and National Police departments.

The results of 26 monitoring visits revealed a lack of information and awareness-raising activities aimed at informing representatives of national minorities (communities) about the scope of their rights.

During a meeting of the Expert Council on National Minorities and Indigenous Peoples under the Representative (Deputy) of the Commissioner for Equal Rights and Freedoms, Rights of National Minorities, Political and Religious Beliefs (hereinafter – the Expert Council), representatives of national minorities (communities) expressed concern regarding the inaction of RSAs/RMAs on the issue of establishing Centres for National Minorities (Communities) of Ukraine in the regions.

However, in accordance with the Procedure for the Establishment and Functioning of Centres for National Minorities (Communities) of Ukraine, such centres are established specifically on the initiative of public associations of national minorities (communities) of Ukraine operating within the territory of the relevant administrative-territorial unit.

The Commissioner's Secretariat analysed the aforementioned Procedure and, during a regular meeting of the Expert Council, its provisions were presented and explained in detail with a view to ensuring a proper understanding of the procedures established by law and the delineation of powers between the entities responsible for their implementation.

This indicates a lack of awareness among representatives of national minorities (communities) and local authorities regarding the delineation of powers and procedures in the implementation of state policy on national minorities (communities).

This situation highlights the need for systematic information and awareness-raising regarding the mechanisms for realising the rights of national minorities (communities), in particular the procedure for establishing Centres for National Minorities (Communities) of Ukraine, as well as the roles and functions of all parties involved in this process.

The establishment and proper functioning of consultative and advisory bodies within local state administrations remain a problematic issue. In accordance with the provisions of the Law of Ukraine “On National Minorities (Communities) of Ukraine”, these bodies are required to ensure the participation of representatives of national minorities in the formulation and implementation of state policy at regional level. In practice, in a number of regions, such bodies are either not established or function formally. One of the reasons is the lack of proper coordination and methodological support from the State Service of Ukraine for Ethnic Policy and Freedom of Conscience, which, in accordance with its powers, is responsible for ensuring the formulation and implementation of state policy in the field of protecting the rights of national minorities (communities). Currently, the lack of systematic interaction between the central executive authority and local state administrations, as well as the absence of clear recommendations on the establishment and operation of such consultative and advisory bodies, hinders the effective implementation of legislative provisions and limits the opportunities for representatives of national minorities (communities) to participate in decision-making processes at the local level.

9.5.2. Language Rights of National Minorities (Communities)

Ensuring the linguistic rights of persons belonging to national minorities (communities) is one of the key prerequisites for the preservation and development of their cultural identity. This right is based on the provisions of Articles 10, 11 and 24 of

the Constitution of Ukraine and stems from the state's international obligations, particularly in the field of protecting the languages of national minorities (communities).

Analysis of legal practice shows that for a long time the implementation of language rights of national minorities (communities) in Ukraine was fragmentary and did not always comply with international standards, in particular the provisions of the European Charter for Regional or Minority Languages (hereinafter referred to as the Charter). Certain languages of national minorities (communities), despite their historical presence on the territory of Ukraine, were not properly covered by legal protection mechanisms.

For a long time, the implementation of the Charter proceeded in isolation from its primary objective – the protection of languages that are genuinely at risk of extinction or have a limited sphere of use. One of the reasons for this was the use of an inaccurate official translation of the Charter during its ratification by Ukraine, which influenced subsequent legal practice.

In January 2025, a draft Law of Ukraine “On Amendments to Certain Laws of Ukraine Related to the Update of the Official Translation of the European Charter for Regional or Minority Languages” (reg. No. 12364 of 26 December 2024) was submitted to the Commissioner for approval. The general thrust of the draft law was supported, and the need for further refinement of the list of languages covered by the Charter was emphasised, with a view to ensuring an equal and non-discriminatory approach. In accordance with Resolution No. 670 of the Cabinet of Ministers of Ukraine of 7 April 2024 “On the approval of the List of languages of national minorities (communities) and indigenous peoples of Ukraine threatened with extinction” (hereinafter ‘Resolution No. 670’), which approved the list of languages of national minorities (communities) at risk of extinction, and international data from UNESCO, certain languages of national minorities (communities) and indigenous peoples of Ukraine, in particular Belarusian, Gagauz, Yiddish, Karaim, Crimean Tatar, Krymchak, Romani, Rumei and Urum, are under a real threat of extinction. The risks of losing these languages have increased significantly as a result of the Russian Federation's armed aggression and the forced displacement of language speakers from their traditional places of residence.

In July 2025, the draft Law of Ukraine “On Amendments to Certain Laws of Ukraine in Connection with the Update of the Official Translation of the European Charter for Regional or Minority Languages” (reg. No. 12364 of 26 December 2024), submitted for consideration by the Cabinet of Ministers of Ukraine, was withdrawn from consideration following the resignation of the Government of Ukraine.

Meanwhile, at the initiative of the new Ukrainian Government, a draft Law of Ukraine “On Amendments to Certain Laws of Ukraine in Connection with the Update of the Official Translation of the European Charter for Regional or Minority Languages” (registration No. 14120) was registered in the Verkhovna Rada of Ukraine. The comments made earlier were taken into account in the final version of draft Law of Ukraine No. 14120.

This Law of Ukraine is awaiting signature by the President of Ukraine. Should it come into force, the implementation of the Charter's provisions will require the drafting of normative and legal acts and guidelines for state authorities and OMS, taking into

account the consequences of the war, internal displacement and the growing risks of certain communities losing their linguistic identity.

9.5.3. Protection of the Rights of Persons Belonging to the Roma National Minority (Community)

In 2025, a unit for the protection of the rights of persons belonging to the Roma national minority (community) was established within the Commissioner's Secretariat. Its activities are aimed at ensuring the Roma community's access to social and administrative services and promoting their integration into Ukrainian society.

The establishment of the unit ensured the transition from responding to individual appeals to systematic work in the field of protecting the rights of the Roma national minority (community), in particular through the development of interaction with international organisations and civil society institutions, as well as the participation of the Commissioner and staff of the Commissioner's Secretariat in national and international events, including Council of Europe initiatives, Roma Week in Brussels, the Ukraine Recovery Conference (URC-2025) and a study visit by Ukrainian civil servants to Romania.

a) Lack of Documents Proving Identity or Confirming Ukrainian Citizenship

As of 2025, the lack of documents proving identity or confirming Ukrainian citizenship remains one of the key systemic factors hindering the exercise of the rights of persons belonging to the Roma national minority (community), including at the intergenerational level.

Proper documentation is a prerequisite for the exercise of constitutional rights and freedoms and for access to administrative, social, medical and other public services.

Addressing the issue of undocumented status is identified as one of the objectives of Goal 2 of the Strategy for promoting the realization of the rights and opportunities of persons belonging to the Roma national minority in Ukrainian society for the period up to 2030, approved by Order of the Cabinet of Ministers of Ukraine No. 866-r of 28 July 2021 (hereinafter – the Strategy), namely: 'Ensuring legal protection and combating discrimination against persons belonging to the Roma national minority'.

In accordance with the Strategy, facilitating the acquisition of identity documents, documents confirming Ukrainian citizenship or special status, as well as ensuring the state registration of civil status acts, is identified as one of the key areas in overcoming discrimination, enhancing access to legal protection and promoting the participation of persons belonging to the Roma national minority (community) in public life. To implement it, an action plan for 2024–2025 has been approved, setting out the tasks for state authorities and OMS.

At the same time, there are no stable mechanisms for implementing these tasks at the level of territorial communities. No systematic approaches have been developed for identifying undocumented individuals and providing them with social and legal support. Interaction between OMS, civil registry offices, the SMS, the courts and the free legal aid system remains fragmented.

According to the findings of a study conducted as part of the Commissioner's project 'Social Atlas of Roma Communities in Zakarpattia' (hereinafter 'the Study'), it

was established that 18% of households have at least one adult family member without a birth certificate, passport or personal identification number.

This indicates the persistence of systemic undocumented status and the insufficient effectiveness of mechanisms to address it at the local level.

b) Restricted Access to Social, Medical and Administrative Services due to a Lack of Documentation

Monitoring visits by staff of the Commissioner's Secretariat and the processing of citizens' appeals in 2025 revealed that, in the absence of documentation, the registration of social status and benefits, access to healthcare and administrative services for persons belonging to the Roma national minority (community) is significantly restricted or actually unavailable.

The systemic nature of such restrictions was also confirmed by the findings of a Study in Zakarpattia region. In particular, in the Mukachevo territorial community, 100% of the households surveyed reported a need for assistance with the registration of social statuses, with 63% of respondents noting the need for support during the documentation process. The most common are the needs to register the status of a low-income family (17%), a large family (10%), a single parent (5%), a disability (4%), and the status of a child under guardianship (3%).

Findings from Study in other territorial communities within the region indicate that restrictions on access to services are observed regardless of the type of community, but are more pronounced in places of compact residence of the Roma community, particularly where mechanisms for social and legal support are lacking.

The scale of the restrictions identified necessitated a response from the Commissioner to reduce practical barriers and improve access to legal and administrative information for Roma families.

In 2025, the Commissioner's Secretariat, in collaboration with the international charitable organisation 'Roma Women Fund 'Chiricli' and with the support of the Council of Europe, conducted 7 awareness-raising events in 6 territorial communities in Zakarpattia region, involving over 520 representatives of the Roma community, OMS and relevant services.

The events were aimed at raising legal awareness regarding the exercise of rights, access to administrative, social and legal services, and procedures for interacting with public authorities. Information materials were distributed in 8 local communities and 12 settlements across the region, particularly in places of compact residence of the Roma community.

The results of the activities showed that in the absence of institutionally established support mechanisms at the level of territorial communities, even with the availability of information support, access of undocumented persons to services remains fragmented. This indicates the systemic nature of restrictions on access to public services, primarily due to the lack of inter-agency coordination and clearly defined responsibilities of authorities at the local level.

c) Issues Relating to the Organisation of Documentation Procedures and Interaction between Authorised Bodies

The current procedure for issuing Ukrainian passports is set out in the Procedure for registration, issuance, exchange, transfer, withdrawal, return to the state, invalidation and destruction of Ukrainian passport, approved by Resolution No. 302 of the Cabinet of Ministers of Ukraine dated 25 March 2015 (hereinafter – Procedure No. 302).

The procedure for restoring original documents, in particular birth certificates, in complicated cases is complex in nature and involves several authorised bodies, including civil registry offices, territorial units of the SMS, courts, social protection authorities, healthcare institutions and the free legal aid system.

The absence of an institutionally enshrined coordination function and uniform algorithms for interaction leads to the fragmentation of procedures, different application of legal norms, delays in the consideration of cases and the dispersal of responsibility among authorities, which complicates the completion of the documentation procedure for applicants.

With a view to removing obstacles to the registration of the Roma national minority (community) in 2025, Resolution No. 1709 of the Cabinet of Ministers of Ukraine of 24 December 2025, “Certain issues concerning the issuance (including as a replacement for a lost or stolen one), exchange of Ukrainian passports and Ukrainian passports for travel abroad, including abroad”, amendments were made to Procedure No.302.

A new measure introduced on the initiative of the Commissioner by the aforementioned resolution was the formalisation of the provision for staff of the territorial bodies and units of the SMS to collect documents off-site using mobile workstations.

This mechanism is used to process documents for persons residing or staying in remote and inaccessible settlements, places of compact residence, and regions with infrastructure destroyed as a result of military operations, as well as for persons who have suffered deprivation of personal liberty as a result of armed aggression against Ukraine.

At the same time, the effectiveness of implementing these changes depends to a large extent on the practical implementation of the updated procedures on the ground and the level of inter-agency coordination.

d) The Right to Decent Living Conditions

The right to decent living conditions is guaranteed by Article 11 of the International Covenant on Economic, Social and Cultural Rights and Articles 3, 47, and 48 of the Constitution of Ukraine, and encompasses access to housing, basic infrastructure, and public services regardless of place of residence. Ensuring the realization of this right falls within the powers of OMS in accordance with Articles 30 and 33 of the Law of Ukraine “On Local Self-Government in Ukraine”.

The creation of adequate living conditions for persons belonging to the Roma national minority (community) is defined as Goal 5 of the Strategy - “Improving the quality of living conditions of persons belonging to the Roma national minority” - which aims to overcome residential segregation, improve access to water supply and other utilities, modernize settlements, and resolve housing and land use issues.

e) Spatial Segregation of Places of Compact Residence of Persons Belonging to the Roma National Minority (Community)

In the local communities of Zakarpattia region, given the significant size of the Roma population and the internal migration caused by the Russian Federation's full-scale armed aggression against Ukraine, the practice of spatially isolating places of compact residence of the Roma community persists.

In a number of communities, such settlements are located outside the main residential areas and at a considerable distance from administrative centres, social infrastructure facilities and transport routes. They are not included in general plans or other urban planning documentation, which prevents the development of infrastructure and actually entrenches their isolated status.

During monitoring visits in 2025, it was found that in the village of Kontsovo, in the Kholmivska community, the lack of adequate road links and regular public transport hinders residents' access to healthcare institutions, educational institutions and OMS.

In the Velyky Berezny community, spatial isolation is exacerbated by the poor condition of roads, which limits access to services and hinders the realisation of children's right to education, particularly in adverse weather conditions.

In the Uzhhorod urban community, places of compact residence of the Roma community are located on the outskirts and have limited access to social infrastructure facilities, which hinders the integration of residents into community life.

The examples given demonstrate the systemic nature of spatial segregation, which stems from the failure to adequately take into account the needs of such areas in spatial and infrastructure planning processes.

The Commissioner provided **46** recommendations to OMS regarding the integration of the needs of places of compact residence of the Roma community into planning documents, however, these were not systematically implemented during 2025, which has led to the persistence of isolation and the need for further response.

f) Restrictions on Access to Basic Engineering Infrastructure in Residential Areas

Access to basic engineering infrastructure is an integral part of the right to decent living conditions and encompasses water supply, drainage, electricity supply and the management of household waste. Ensuring these conditions falls within the remit of OMS and must be carried out in accordance with the principles of equality and non-discrimination.

The findings of monitoring visits to places of compact residence of the Roma community in Zakarpattia region indicate systemic problems with access to basic engineering infrastructure.

In a significant number of communities, there is a lack of, or the unsatisfactory condition of, water supply and drainage systems, an unstable or unregistered electricity supply, and a lack of organised waste collection, which poses health risks to residents and makes it difficult to comply with sanitary standards.

In a number of cases, residents use decentralised or temporary water sources, make unofficial or unsafe connections to the electricity grid, and waste disposal takes place outside organised collection and removal systems.

The identified problems indicate the systemic nature of the restrictions and require the response of OMS within their powers.

Following the Commissioner's response, access to basic engineering infrastructure in the Roma settlement in the village of Kontsovo has been improved.

Between 2024 and 2025, staff of the Commissioner's Secretariat carried out monitoring visits to the place of compact residence of the Roma community in the village of Kontsovo, Kholmivska community, Zakarpattia region.

During the monitoring, the unsatisfactory state of the engineering infrastructure was noted, in particular limited access to safe drinking water and the lack of a systematic household waste collection system, which posed health risks to residents.

Following the Commissioner's response, interaction with OMS and municipal services was initiated, a water supply line was extended to Polyova Street, regular waste collection was established, and the sanitary conditions of the area were improved.

This case shows that institutional response and inter-agency interaction allow for the elimination of particular violations, but a transition to systematic provision of access to engineering infrastructure at the community level is necessary.

g) Lack of Regulation regarding the Legal Status of Housing and Land Plots

The legal status of housing and land plots is an integral part of the right to decent living conditions and legal certainty. The absence of title documents or uncertainty about the land use regime affects living conditions, the ability to connect to engineering infrastructure, and the protection of the right to housing.

According to the findings of a Study in Zakarpattia region, 61% of Roma households live in their own homes without title documents, 33% have registered ownership, 5% live in rented accommodation, and 1% in temporary accommodation for internally displaced persons.

During monitoring visits, it was noted that persons belonging to the Roma national minority (community) were living in housing without the necessary permits and on land plots with an undefined or disputed legal status, particularly in the Vynogradiv, Perechyn, Kholmok and Velyky Berezny communities. Similar problems exist and in other communities in the region.

The lack of regulation regarding the legal status of housing and land plots is a long-standing issue and requires a response from OMS within the scope of their powers.

9.5.4. Implementation of the Law of Ukraine “On the Indigenous Peoples of Ukraine”

In accordance with Article 3 of the Law of Ukraine “On the Indigenous Peoples of Ukraine” of 1 July 2021 No. 1616-IX, the representative bodies of the indigenous peoples of Ukraine – the relevant representative institutions established by the indigenous peoples and, in accordance with the Constitution and laws of Ukraine, vested with the right to

represent the indigenous peoples and make decisions on their behalf (hereinafter – representative bodies).

The realisation of the rights of the indigenous peoples of Ukraine, as provided for by Law No. 1616-IX, their scope and the procedure for their realisation, are inextricably related to the direct participation of representative bodies in these processes. The realisation of such rights is ensured primarily through consultation and/or the participation of representative bodies in these processes.

Such representative bodies are an established international practice, serving as a means of realising the political, social and cultural rights of indigenous peoples and other rights provided for in the UN Declaration on the Rights of Indigenous Peoples.

According to the DESS, the draft order of the Cabinet of Ministers of Ukraine “On the legal status of the representative body of the Crimean Tatar people”, prepared by the DESS in 2023, was repeatedly returned by the Secretariat of the Cabinet of Ministers of Ukraine for further revision and was not adopted in 2025. The need to expedite the recognition of the status of representative bodies was also emphasised by the Committee on the Elimination of Racial Discrimination in its Concluding Observations on the combined twenty-fourth and twenty-sixth periodic reports of Ukraine on the fulfilment of its obligations under the UN International Convention on the Elimination of All Forms of Racial Discrimination.

Furthermore, compared to the developed and multi-level system of national legislation in the field of national minorities (communities), alongside European integration policy documents, the main legislative instrument through which representatives of the indigenous peoples of Ukraine can formally exercise their rights remains Law of Ukraine No. 1616-IX.

In implementation of the Final Provisions of Law No. 1616-IX, the Government has as yet not developed any normative and legal acts that would ensure representatives of the indigenous peoples of Ukraine an equal degree of legal protection compared to that guaranteed to representatives of national minorities (communities) in Ukraine. The development of such acts takes on particular significance in view of the dispersed settlement of representatives of the indigenous peoples of Ukraine due to forced resettlement to territory controlled by the Government of Ukraine, the threat of the disappearance of their languages, and the Russian Federation’s assimilation policy in TOT.

Thus, the lack of adequate regulatory framework for representatives of the indigenous peoples of Ukraine deprives them of both procedural mechanisms and the expected scope of enjoyment of their rights in areas relating to the public use of the languages of the indigenous peoples of Ukraine, in particular during public, cultural, artistic and other events, including relevant information materials, in the field of advertising and during election campaigns, etc.

9.6. Civil and Political Rights

9.6.1. Exercise of the Right to Access Digital Services by Individuals Who have Refused to Obtain a RNOKPP

Article 35 of the Constitution of Ukraine guarantees everyone freedom of thought and religion. In turn, Articles 63 and 70 of the Tax Code of Ukraine grant the right to refuse to be issued with a RNOKPP if its assignment conflicts with religious beliefs. In accordance with the provisions of the Tax Code of Ukraine, such persons may be registered in a separate register by passport series and number, and a corresponding mark in the passport replaces the RNOKPP.

In the course of proceedings initiated following an appeal by citizen Ms. B., it was established that the applicant, who had refused to obtain a RNOKPP due to her religious beliefs, was unable to log in to the 'Diia' mobile app.

An investigation revealed that logging in to the app without an RNOKPP is not technically possible. According to information from the MinDigital, such individuals are able to log in to the Diia Portal (diia.gov.ua) via the id.gov.ua system using BankID, a qualified electronic signature and other means of identification.

The functionality of the web version of the Diia Portal is limited compared to the mobile app: there is no access to part of the state programmes and digital services, in particular 'Diia.Signature'. Such restrictions effectively hinder the participation of individuals without an RNOKPP in state support programmes and restrict their access to certain administrative and commercial services.

According to data from the State Register of Individual Taxpayers, as of December 2025, 151,431 individuals were recorded in the separate register. However, the data in the separate register of the State Register is constantly changing, as individuals are continually being added to or removed from the register.

At present, it is not possible to identify, from the total number of appeals, those relating to obstacles to the exercise of individuals' rights arising from the refusal of a registration number. According to the SMS's information system, 23,171 Ukrainian passports in the form of ID cards were issued during the period from 1 November 2016, with the word 'refusal' entered in the relevant field. Furthermore, during the period from 1 January 2018, the territorial units of the SMS issued 10,189 Ukrainian passports in the form of a passport booklet to individuals in respect of whom a court decision, which has become final, on the obligation of the SMS to process and issue a 1994-model Ukrainian passport, and in which a note regarding the refusal of the RNOKPP has been included.

The results of the proceedings indicate the existence of a systemic problem related to the implementation of state policy in the field of digitalisation. The lack of a comprehensive inter-agency approach to resolving the issue in question has a negative impact on the effective realisation of citizens' rights.

Further digitalisation of public services must be carried out in accordance with the principles of inclusivity, non-discrimination and proportionality, and by ensuring equivalent alternative mechanisms for access to public services for all categories of persons, including those who have exercised their right to refuse the RNOKPP.

9.7.2. Violation of the Right to Birth Registration

Law No. 1616-IX provides that the indigenous peoples of Ukraine are guaranteed the right to legal protection against any actions aimed at depriving them of the signs of their ethnic identity and integrity as distinct peoples, of their cultural values.

In accordance with the Rules for the State Registration of Civil Status Acts in Ukraine, at the parents' request, a patronymic may also be formed in accordance with national traditions or not assigned at all. A corresponding note regarding the parents' wishes is made in the birth certificate under the heading 'For notes'.

Consequently, state authorities are obliged to ensure the realisation of the right to freely choose a first name, patronymic and surname in accordance with their national traditions.

The Commissioner received an appeal from a Ukrainian citizen, Ms A., regarding a violation by the SCRO in Kyiv of her right to register her child's birth.

The applicant, together with the child's father, addressed the SCRO with an application for state registration of the birth, specifying the child's patronymic in accordance with Crimean Tatar national tradition. However, they were refused on the grounds that birth registration is not carried out using the patronymic proposed by the child's parents.

Following the Commissioner's response, the Ministry of Justice of Ukraine initiated an investigation, the outcome of which ensured the family's right to register the child's patronymic in accordance with Crimean Tatar traditions: the child's patronymic was assigned by mutual agreement of the parents, in accordance with national traditions.

This situation highlights the lack of effectiveness of the Ministry of Justice of Ukraine as the central executive body responsible for formulating and implementing state policy, particularly in the area of state registration of civil status acts through the state civil registration offices.

The Commissioner received an appeal from a citizen, Mr K., regarding a possible violation by the local department of the SCRO of his right to register his child's birth. The appeal states that, in order to register his son's birth, the applicant addressed the local department of the SCRO, but his application was refused. According to K., his wife had also addressed the local department of the SCRO to register the child's birth, but she too was refused on the grounds that the proposed patronymic for their son did not comply with the established rules.

Following the Commissioner's response, an investigation was carried out. On the basis of the child's mother's application, the SCRO drew up a birth record and issued the relevant certificate.

As part of a pilot project to identify barriers to the identification and documentation of undocumented persons residing in the Volyn and Rivne regions, initiated by the Commissioner, with the support of the Office of the United Nations High Commissioner for Refugees, visits were carried out in November and December 2025 to settlements where undocumented persons may be living.

During a visit to the village of Vydrychi in the Kamin-Kashyrskyi district of the Volyn region, undocumented individuals were identified who are at risk of statelessness. Among these individuals are two minors born in 2021 and 2024. The children do not have birth certificates, and the mother is documented only by her own birth certificate. The children's father is absent. A third child died, which was recorded by doctors but not by a death certificate.

Following the questioning of the mother and the village head, it was established that the mother and local authorities had addressed the state civil registration offices, but were refused due to the mother's lack of documents.

Following the Commissioner's response, on 20 January 2026, the SCRO of the Kamin-Kashirsky District in the Volyn Region carried out the state registration of the children's births.

Furthermore, children are not properly documented, are not registered at their place of residence, and do not receive social assistance from the state.

Article 7 of the Convention on the Rights of the Child guarantees every child the right to immediate registration after birth, the right to a name and the right to nationality. The Convention on the Reduction of Statelessness stipulates that the state is obliged to ensure that a child born on its territory and who may become stateless is granted nationality.

In accordance with parts 1 and 2 of Article 13 of the Law of Ukraine No. 2398-VI of 1 July 2010, the state registration of a child's birth is carried out with the simultaneous determination of their parentage and the assignment of a surname, first name and patronymic. The child's parentage is determined in accordance with the Family Code of Ukraine. State registration of a child's birth is carried out upon a written or oral application by the parents or one of them at the place of the child's birth, or at the parents' place of residence, or upon an application submitted electronically.

9.7.3. Violation of the Right to Obtain Documents and Freedom of Movement

The loss or damage of passport documents makes it impossible or significantly more difficult for a person to exercise their rights and freedoms and to receive protection from the state. Particular attention should be paid to cases where the loss or damage of documents concerns parents with minor children who are abroad.

An analysis of current legislation and appeals received by the Commissioner has highlighted the need to address situations where a passport document cannot be obtained by one of the parents with whom the minor child is staying.

During the examination of appeals received by the Commissioner, a problem was identified in the area of children's documentation which appears to be systemic and is related to the specific administrative practices of the SMS bodies.

In particular, it has been established that in cases where a passport document for a child under the age of 12 has been issued or produced upon application by one of the parents, it is impossible for the other parent, with whom the child actually resides,

to obtain it. In such cases, the passport document remains at the territorial office of the SMS until it is collected in person by the parent who submitted the application.

At the same time, it was impossible for the other parent, with whom the child was staying, to apply for a new passport document, as the information systems record the status of the issued document that was not received. Consequently, it has been established that there is no alternative administrative mechanism that would allow the situation to be resolved, taking into account the child's actual place of residence and their best interests.

Such situations typically arise in cases of dissolution of marriage between parents, the existence of conflictual relations, loss of contact with one of the parents, and as a result of the forced displacement of families in the context of the Russian Federation's armed aggression against Ukraine.

As a result, the child could find themselves in a situation where they are actually deprived of the opportunity to use a passport document, which negatively affects the realisation of a number of their rights, in particular the right to freedom of movement and access to social and medical services.

Such circumstances indicated gaps in the legal framework and the absence of appropriate internal algorithms for action within the activities of the SMS bodies.

As the appeals revealed a systemic problem and violations of children's rights, a working meeting was initiated with representatives of the SMS. During the meeting, key barriers leading to violations of children's rights were discussed, as well as possible amendments to the current legislation.

Following the submission to the Commissioner for approval of a draft resolution of the Cabinet of Ministers of Ukraine, aimed at regulating certain aspects of the registration, production and issuance of Ukrainian passports and Ukrainian passports for travel abroad, proposals were drawn up to improve certain provisions of the resolutions of the Cabinet of Ministers of Ukraine dated 7 May 2014 No. 152 and 25 March 2015 No. 302. The Commissioner's proposals were incorporated into the draft resolution.

On 24 December 2025, the Cabinet of Ministers of Ukraine adopted Resolution No. 1709. From now on, a passport document issued upon application by one parent in the name of a child under the age of 12 may be issued to the other parent or to another person authorised by power of attorney with whom the child resides.

As part of the analysis of the implementation of the Commissioner's recommendations set out in the Annual Report on the State of Observance of Human and Civil Rights and Freedoms in Ukraine in 2024, it was established that, among other recommendations, the SMS was recommended to develop a procedure for cooperation during the identification and verification of individual, the processing and issuance of passport documents or certificates for return to Ukraine to persons who were residing in the territory of the Autonomous Republic of Crimea at the time of the occupation.

The MIA has also informed the Commissioner that, as of today, the procedure for cooperation between the FDU and the SMS during the processing of certificates for return

to Ukraine is regulated by the Procedure for the Processing and Issuance of Certificates for Return to Ukraine No. 285 (hereinafter – Procedure No. 285).

In accordance with Procedure No. 285, when issuing a certificate for return to Ukraine, the identity of the person is verified, their Ukrainian citizenship is confirmed, and a decision is made regarding the issuance of the relevant document.

During these procedures, the employee conducts checks to obtain information about the person from the available records of the FDU and the MFA, and sends requests to the territorial bodies of the SMS and other state authorities to obtain information about the person or their legal representatives. If the person has been issued with a Ukrainian passport, a Ukrainian passport for travel abroad issued by territorial bodies of the SMS, or has undergone the procedure for acquiring Ukrainian citizenship, the SMS provides responses accompanied by available copies of documents bearing a photograph.

Based on the results of the checks, the FDU decides whether to issue a certificate for return to Ukraine.

However, according to information provided to the Commissioner by the MIA, there are frequent cases where Ukrainian citizens, having reached the age of 18, apply to the FDU for the issuance of a certificate for return to Ukraine, in whose names no documents certifying their identity and confirming Ukrainian citizenship have been issued, and in most cases, data on them is absent from state registers. Under the current identification procedure set out in Procedure No. 285, such persons are, in most cases, refused a certificate for return to Ukraine.

The Commissioner was considering an appeal from T., who had left the temporarily occupied territory of the Autonomous Republic of Crimea for the Republic of Poland. Given that, at the time of the occupation of the peninsula in 2014, she had not yet reached the age at which a passport document is issued, the only document she possessed was a birth certificate issued by the competent authorities of Ukraine.

When she applied to the FDU regarding the issuance of a Ukrainian passport or a certificate for return to Ukraine, T. received a refusal, as it was impossible to identify her.

In turn, the Ministry of Justice confirmed the validity of the applicant's birth certificate, whilst the SMS provided information that a passport document could only be issued within the territory of Ukraine. The refusal to issue a certificate for return made it impossible for T. to exercise her right to return to Ukraine and to obtain a Ukrainian passport.

In addition, whilst reviewing appeals from Ukrainian citizens permanently residing abroad, instances have been recorded of refusals to process and issue passport documents, including through separate units of the State Enterprise 'Dokument' abroad and the FDU, due to the applicants' lack of a military registration document.

In the course of monitoring the feasibility of exercising the right to apply for a passport document whilst simultaneously registering conscripts for military service, those liable for military service and reservists, requests were sent to the MoD and the SMS. According to information from the MoD, the mechanism for registering conscripts for military service, persons liable for military service and reservists abroad, referred to in

the link provided, is set out in the Procedure for the Organisation and Maintenance of Military Registration of Conscripts, Persons Liable for Military Service and Reservists. According to information from the SMS, in accordance with paragraph 20 of Procedure No. 152, in the event of a person's permanent residence or temporary stay abroad, documents for the issuance (including as a replacement for a lost or stolen one) or for the exchange of a Ukrainian passport for travel abroad should be submitted to the FDU or to a separate unit of the State Enterprise 'Dokument' located outside Ukraine.

In accordance with paragraph 5 of Article 20 of the Law of Ukraine No. 389-VIII of 12 May 2015, when providing consular services to the aforementioned category of citizens, in particular the issuance of passports, in the FDU, the consular officer shall verify military registration documents in accordance with the procedure set out in Resolution of the Cabinet of Ministers of Ukraine No. 704-dsk of 17 June 2024, namely using the 'Reserve+' mobile application.

This requirement does not apply in the following cases: the issuance of a certificate for return to Ukraine, the performance of consular acts concerning children of a Ukrainian citizen, and the performance of acts upon applications from Ukrainian citizens who are under arrest, detained or imprisoned abroad.

The Commissioner was considering an appeal lodged by K. on behalf of her husband, A., who resides with her in the Republic of Estonia, concerning a possible violation of the right to obtain a passport document.

It was established that, following an accident, A. had been granted disability status and was residing in Estonia on the basis of a permanent residence permit, whilst being registered with the consulate. When he applied to obtain a new passport to replace his expired one, his application was refused due to the lack of military registration details. He is unable to obtain such documents without returning to Ukraine. There are no units of the State Enterprise 'Dokument' in Estonia, and returning to Ukraine is impossible due to his state of health.

As a result, Ukrainian citizen A. has been left without adequate legal protection, and the absence of a passport makes it impossible for him to exercise his rights and freedoms.

Consequently, Ukrainian citizens, in particular men aged 18-25 or those with disabilities, who are abroad in countries where there are no separate units of the State Enterprise 'Dokument', are unable to exercise their right to apply for a passport document and receive consular services.

Paragraph 2-14 of the Rules on the Crossing of the State Border by Ukrainian Citizens (hereinafter – the Rules) introduced a special mechanism for regulating the travel abroad of certain categories of persons under martial law. Its application in practice between 2023 and 2025 revealed a number of systemic problems that directly affect the realisation of citizens' constitutional right to freedom of movement.

Firstly, the exercise of the right to cross the state border actually depends on the timeliness and appropriateness of the actions of state authorities or local self-government bodies, which are obliged to submit and update lists of persons to the SBGS

Administration. Failure to submit or late submission of updated information results in negative consequences for the citizen.

Secondly, the current regulatory framework does not provide for a clear and transparent mechanism for removing individuals from the lists should the grounds for crossing the state border cease to exist.

Thirdly, the practice of applying paragraph 2-14 of the Rules indicates a lack of inter-agency coordination and the absence of effective control over the relevance of the information.

These aspects complicate the proper and lawful application of paragraph 2-14 of the Rules in the process of realising citizens' right to freedom of movement.

During the consideration of the appeal lodged by citizen Mr. Sh., it was established that, on the basis of his personal application, his powers as a deputy of the local council had been terminated prematurely by a decision of the relevant local government body. Subsequently, Mr Sh., as a person with a Group III disability, arrived at a border crossing point to travel abroad for medical treatment. However, he was refused permission to cross the state border on the basis of paragraph 2-14 of Rules No. 57.

During the inspection, the OMS informed that it had notified the SBGS of the need to remove Mr. Sh. from the lists of persons submitted in accordance with CMU Resolution No. 69. The SBGS administration stated that it had not actually received such information. As a result, Mr. Sh. remained on the lists of persons granted the right to travel abroad on the basis of decisions regarding official business trips.

Following the Commissioner's response, the OMS ensured provision of updated information regarding the termination of Mr. Sh.'s powers, which enabled him to exercise his right to freedom of movement.

As a result of the failure to submit, or the improper submission of, updated information regarding personnel changes by OMS, the applicant remained unjustifiably on the relevant registers, which led to a restriction of his right to freedom of movement and a refusal to allow him to cross the state border on grounds that were no longer relevant.

Moreover, instances where state authorities and OMS fail to inform the SBGS Administration of personnel changes in a timely manner are not isolated. Resolution No. 69 of the Cabinet of Ministers of Ukraine provides for the obligation of public authorities and OMS to submit to the SBGS Administration lists of persons specified in paragraph 2-14 of the Rules, and, in the case of personnel changes, to update such information no later than the day following the adoption of the relevant decision.

Failure to submit updated information following a decision on personnel changes indicates non-compliance with the requirements of current legislation and results in a violation of individuals' right to freedom of movement.

At the same time, restrictions on constitutional rights and freedoms should be applied exclusively in compliance with the principles of legality, reasonableness and proportionality, and improper inter-agency cooperation and failure to provide timely information cannot be relied on as negative consequences for citizens.

9.7.4. The Right of Foreigners Serving in the Armed Forces of Ukraine to Acquire Ukrainian Citizenship

Since the start of the Russian Federation's full-scale armed aggression, the question has arisen regarding the legal status of foreign citizens, in particular Russians and Belarusians, who are participating in armed resistance, as well as nationals of the aggressor state who are family members of servicemen in the Armed Forces of Ukraine.

Between 2022 and 2025, the Commissioner considered **62** appeals on the issues of confirming the legality of stay in the territory of Ukraine or acquisition of Ukrainian citizenship by foreigners (2022 – 6 appeals, 2023 – 12 appeals, 2024 – 27 appeals, 2025 – 17 applications).

The Commissioner sent letters on his own initiative to the Verkhovna Rada of Ukraine, the Government and the SMS, organised working meetings and meetings chaired by the Commissioner, and submitted concrete proposals for amendments to the legislation. The aim of these initiatives was to regulate the lawful stay in Ukraine of foreigners, in particular citizens of the Russian Federation and the Republic of Belarus, who serve on a contractual basis in the Armed Forces of Ukraine, the State Special Transport Service or the National Guard of Ukraine.

This led to the adoption of Law of Ukraine No. 3897-IX of 20 August 2024 and Law of Ukraine No. 4502-IX of 18 June 2025, which, in particular, simplify the acquisition of Ukrainian citizenship by foreigners serving in the armed forces under contract, in particular by guaranteeing the right to submit a declaration of renunciation of foreign citizenship.

At the same time, cases were established where a foreigner acquired Ukrainian citizenship but, within a two-year period, did not complete the procedure for renouncing the citizenship of the aggressor state and, following the start of a full-scale invasion, joined the defence of Ukraine as a citizen of Ukraine, documented by a temporary certificate of a Citizen of Ukraine.

The Commissioner was considering an appeal from a serviceman, Mr. U., who had been a citizen of the aggressor state but had acquired Ukrainian citizenship. The appeal indicated that Mr. U. had acquired Ukrainian citizenship prior to the start of the full-scale invasion and was documented with a temporary certificate of a Citizen of Ukraine. Due to the start of the war, Mr. U. had not completed the procedure for renouncing his Russian citizenship. However, in order to defend Ukraine's independence and sovereignty, he enlisted in the AFU. He served without a contract, was awarded, but was discharged from service due to injury.

In accordance with Law No. 3897-IX, under the condition of serving in the AFU under a contract, Mr. U. would have been entitled to renounce his Russian citizenship on a declarative order, and in the absence of such a contract – he is guaranteed the right to complete the procedure after the termination or repeal of the legal regime of martial law.

Mr. U.'s service in the Armed Forces of Ukraine made it impossible for him to apply to the Russian authorities.

Such persons fall outside the scope of the Law of Ukraine No. 3897-IX of 20 August 2024 and the Law of Ukraine No. 4502-IX of 18 June 2025.

By participating in the defence of Ukraine's independence and sovereignty, servicemen who are citizens of the Russian Federation are actually deprived of the opportunity to exercise their right to acquire Ukrainian citizenship due to their holding of citizenship of the aggressor state.

The Commissioner receives appeals from foreigners and Ukrainian citizens in the interests of foreigners serving in the Armed Forces of Ukraine regarding a possible violation of the right to acquire Ukrainian citizenship.

Part Four of the Transitional and Final Provisions of Law of Ukraine No. 4502-IX of 18 June 2025 provides that a foreigner and a stateless person who acquire Ukrainian citizenship as persons who are serving or have served in the Armed Forces of Ukraine under a contract, the State Special Transport Service or the National Guard of Ukraine, including those awarded a state award of Ukraine, or are foreigners who have obtained a temporary residence permit on the basis of parts twenty or twenty-four of Article 4 of Law of Ukraine No. 3773-VI of 22 September 2011, or who are the spouse of such a person or a parent of their spouse, as well as citizens of a state recognised by the Verkhovna Rada of Ukraine as an aggressor state or an occupying state, who have suffered persecution in their country of nationality, are entitled to submit a passport document, the validity of which has expired or which is subject to renewal, provided that, in order to obtain a new document, they are required to apply to the state authorities of their country of nationality or their country of previous permanent residence.

The Commissioner is considering an appeal from a foreigner, Mr A, who is serving in the AFU on a contract basis. In his appeal, Mr A complains about unequal treatment of foreign servicemen serving in the AFU on a contract basis. Thus, compared to Russian citizens, other foreigners are deprived of the right to apply for Ukrainian citizenship with passport documents that have expired, and are also deprived of the right to submit a declaration of renunciation of foreign citizenship.

At the same time, the legislation of former socialist bloc countries provides for criminal liability and loss of citizenship for service in the armed forces of a foreign state. Consequently, even when addressing the diplomatic missions abroad of their own state in Ukraine, foreign servicemen risk persecution by the security agencies of the country of their nationality.

Although a number of countries of the former Soviet Union support Ukraine's territorial integrity and sovereignty, they remain within the sphere of influence of the Russian Federation. Current legislation in the Republic of Kazakhstan and the Republic of Tajikistan, for example, provides for criminal liability and grounds for the loss of citizenship for citizens of these countries who have entered military service in foreign countries.

Consequently, if the validity of the passport documents of the country of origin of foreigners who have served or are serving in the Armed Forces of Ukraine under contract has expired, such persons' appeals to the state authorities of their country of nationality carry the risk of criminal prosecution.

At the same time, current Ukrainian legislation sets out an exhaustive list of foreigners who are entitled to apply for Ukrainian citizenship with a passport document whose validity has expired.

9.7.5. Protecting Journalists' Rights

Freedom of thought, speech and the right to the free dissemination of information form the foundation of democracy and the rule of law. In Ukraine, these rights are guaranteed by Article 34 of the Constitution of Ukraine, Article 10 of the European Convention on Human Rights and Article 19 of the International Covenant on Civil and Political Rights. During a period of full-scale war, the risks faced by journalists have increased significantly: physical threats, obstruction of their work, pressure and restrictions on access to information.

The Commissioner was considering 2 appeals from journalists regarding obstruction of their professional activities. Media representatives complained that they had been subjected to harassment by public officials in connection with their professional activities and journalistic investigations.

As part of the consideration of these appeals, the Commissioner sent relevant letters to the National Police of Ukraine.

As a result of the Commissioner's response, the National Police of Ukraine launched a pre-trial investigation on the grounds of a criminal offence under Part 1 of Article 171 (Obstruction of the lawful professional activities of journalists) of the CC of Ukraine.

A separate and increasingly serious problem is SLAPP lawsuits (Strategic Lawsuits Against Public Participation). These are legal actions brought not to genuinely defend one's honour, but to intimidate, financially exhaust and silence journalists, activists or bloggers. Such pressure creates a 'cooling effect' – the media begin to avoid sensitive topics for fear of lengthy and costly legal proceedings.

In the EU, the issue of countering SLAPP has been actively discussed in recent years. In 2022, the European Commission presented an Anti-SLAPP Directive, which provided for the possibility of early dismissal of unfounded lawsuits, the introduction of mechanisms for compensating respondents for costs, and sanctions against plaintiffs who abuse legal mechanisms. This Council of Europe Directive 2024/1069 was adopted on 11 April 2024. Previously, the EU and the Council of Europe had formulated standards for countering SLAPP.

On 25 May 2025, on the initiative of the Chair of the Verkhovna Rada of Ukraine Committee on Freedom of Speech, a Working Group was established to develop mechanisms to counter SLAPP. Representatives (Deputies) of the Commissioner were included in the Working Group. As part of the Working Group's activities, the Commissioner's Representatives (Deputies) proposed effective mechanisms to counter lawsuits that may be aimed at obstructing journalistic activities.

RECOMMENDATIONS:

To the Verkhovna Rada of Ukraine:

to ensure the consideration and adoption of the draft Law of Ukraine “On Amendments to the Code of Ukraine on Administrative Offences and the Criminal Code of Ukraine regarding combating manifestations of discrimination” (reg. No. 13597 of 4 August 2025);

to ensure the consideration and adoption of the draft Law of Ukraine “On Amendments to Certain Legislative Acts of Ukraine to Bring Them into Line with the Requirements of Articles 8 and 14 of the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights) and Council Regulation (EU) 2016/1104 on the implementation of enhanced cooperation in the area of jurisdiction, applicable law and the recognition and enforcement of decisions in matters of the property consequences of registered partnerships” (reg. No. 12252 of 27 November 2024);

to ensure the consideration and adoption of the draft Law of Ukraine “On Amendments to the Disciplinary Statute of the National Police of Ukraine regarding the settlement of the issue of prevention of gender discrimination and sexual harassment in the workplace” (reg. No. 14036 of 12 September 2025);

to ensure the consideration and adoption of the draft Law “On Amendments to the Law of Ukraine ‘On Advertising’ in connection with the adoption of the Law of Ukraine ‘On Administrative Procedure’” (reg. No. 14346 of 30 December 2025).

To the Committee of the Verkhovna Rada of Ukraine on Humanitarian and Information Policy:

to ensure the activities of the working group to develop a draft law on Ukrainian Sign Language.

To the Cabinet of Ministers of Ukraine:

to develop a draft Law of Ukraine “On Amendments to Article 149 (Human trafficking) of the Criminal Code of Ukraine” with a view to criminalising acts related to the advertising of victims of human trafficking on the internet, and to add the use of information and communication technologies to the list of forms of exploitation in the Note to this article;

to approve the State Social Programme for the prevention and combating of domestic violence and gender-based violence until 2030;

to develop a draft Law of Ukraine “On Amendments to the Law of Ukraine ‘On Combating Human Trafficking’ to improve certain provisions regulating issues in the field of combating human trafficking”, which, in particular, provides for granting local self-government bodies the power to implement measures in the field of combating human trafficking;

to develop and approve procedures for cooperation between authorities, institutions and organisations when responding to cases of sexual violence related to the Russian Federation’s armed aggression against Ukraine, in order to provide victims with

appropriate assistance and protection and to ensure their rights to receive immediate financial compensation;

to ensure a procedure for considering and adopting a decision on establishing the legal status of the representative body of the Crimean Tatar people;

to develop and approve a state programme to support freedom of speech under martial law, which shall include the prevention of SLAPP lawsuits as a separate focus area;

to develop and adopt a resolution defining the operation of the ‘Diia’ mobile application, with mandatory support for alternative identification methods for individuals who have refused to use the RNOKPP;

to develop and submit to the Verkhovna Rada of Ukraine a draft law amending the Law of Ukraine “On Citizenship of Ukraine” with regard to regulating the acquisition of Ukrainian citizenship and the declaratory renunciation of foreign citizenship by foreigners who are serving or have served in the Armed Forces of Ukraine or other military formations, regardless of their country of origin and whether they have signed a contract, provided they have no criminal record for committing a criminal offence;

to ensure that gender audits are carried out in accordance with the Operational Plan of Measures for the Implementation in 2025-2027 of the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030;

to develop and adopt a National Action Plan for the implementation of the UN Convention on the Rights of Persons with Disabilities for the period up to 2030, taking into account the recommendations of the UN Committee on the Rights of Persons with Disabilities, in particular regarding the establishment of an independent mechanism to monitor the implementation of the Convention in accordance with Article 33(2) of the Convention and the designation of the Ukrainian Parliament Commissioner for Human Rights as a component of such a mechanism;

to develop and submit to the Verkhovna Rada of Ukraine for consideration a draft Law of Ukraine “On the Basic Principles of State Policy on the Creation of a Barrier-Free Environment in Ukraine”;

to develop and submit to the Verkhovna Rada of Ukraine a draft law amending the Law of Ukraine “On Amendments to the Law of Ukraine ‘On Free Legal Aid’ with a view to expanding the list of persons entitled to free secondary legal aid” dated 5 December 2024 No. 4133-IX with the aim of including victims of criminal offences motivated by intolerance on grounds of sexual orientation and gender identity to the list of persons entitled to free secondary legal aid, as well as to remove the provision stipulating that the law shall enter into force one year after the termination or repeal of martial law in Ukraine;

to ensure equal access to state programmes, regardless of the applicant's tax registration method;

to consider the feasibility of integrating the public emergency assistance system, accessible via the single telephone number 112, with the ‘Diia’ app, by adding a service for quickly calling the police in cases of domestic violence and/or gender-based violence.

To the Ministry of Justice of Ukraine:

to develop and approve mandatory guidelines on the assignment of first names, surnames and patronymics in accordance with the national traditions of indigenous peoples and national minorities, as well as the application of the provisions of the Rules for the State Registration of Civil Status Acts in Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 52/5 of 18 October 2000, regarding the possibility of assigning non-standard patronymics;

to amend the Rules for the State Registration of Civil Status Acts in Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 52/5 of 18 October 2000, in terms of determining the procedure for registering the birth of a child whose parents or other legal representatives do not possess documents certifying their identity and citizenship;

to ensure quarterly monitoring and off-site inspections of compliance by territorial office's of state civil registration with the provisions of the Rules for the State Registration of Civil Status Acts in Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 52/5 of 18 October 2000;

to organise and conduct comprehensive training for officials of territorial state authorities and public servants of local self-government bodies.

To the Ministry of Internal Affairs of Ukraine:

to ensure that awareness-raising activities are carried out by disseminating information about the 'Hidden SOS Button' mobile app, in particular through the media, social media, and educational and healthcare institutions.

To the Ministry of Foreign Affairs of Ukraine:

to strengthen the capacity of diplomatic and consular missions abroad by expanding coverage of specialized training on combating human trafficking to at least 30% of the total number of employees.

To the Ministry for Development of Communities and Territories of Ukraine:

to strengthen the integration of places of compact residence of the Roma national minority (community) into the spatial planning system by taking into account issues relating to the elimination of spatial segregation when developing and implementing state policy in the field of urban planning, as well as by preparing guidelines for local authorities on the inclusion of such areas in general plans and urban planning documentation.

To the State Migration Service of Ukraine:

to ensure that regular off-site consultations and information and awareness-raising events are held in places of compact Roma residence (at least once a quarter), involving: staff from the territorial offices of the SMS, local government employees, and representatives of non-governmental organisations (where agreed), with the aim of

raising the Roma population's legal awareness regarding the acquisition of identity documents, promoting social integration and reducing the number of undocumented persons.

To the State Service of Ukraine for Ethnic Policy and Freedom of Conscience:

with a view to addressing the lack of documentation among persons belonging to the Roma national minority (community), within the framework of the Inter-agency working group responsible for coordinating the implementation of the Strategy for promoting the realization of the rights and opportunities of persons belonging to the Roma national minority in Ukrainian society for the period up to 2030, ensure the implementation in 2026 of a measure to develop methodological guidelines for state authorities and local self-government bodies on the identification of undocumented persons, including representatives of the Roma national minority (community);

to develop, in dialogue with representatives of the indigenous peoples of Ukraine, and submit for consideration by the Cabinet of Ministers of Ukraine draft normative and legal acts to regulate the procedure, conditions and scope of the exercise of the rights and freedoms provided for by the Law of Ukraine “On the Indigenous Peoples of Ukraine”;

to ensure an adequate level of information and explanation work on the rights of persons belonging to national minorities (communities), as well as the mechanisms for their implementation, by preparing and disseminating generalised guidance materials for local executive authorities and civil society organisations;

to draft and submit to the Cabinet of Ministers of Ukraine a draft normative and legal act regulating the procedures and mechanisms for cooperation between the DESS, regional, and Kyiv and Sevastopol city state administrations on matters relating to the implementation of state policy in the field of national minorities (communities) and indigenous peoples of Ukraine;

to strengthen the coordinating and methodological role in cooperation with regional state (military) administrations and representative organisations of national minorities (communities) with a view to ensuring proper understanding and application of the procedures provided for by legislation in the field of ethnic policy, in particular regarding the establishment and functioning of Centres for National Minorities (Communities) of Ukraine.

to develop, in dialogue with representatives of the indigenous peoples of Ukraine, a draft amendment to the Law of Ukraine “On the Indigenous Peoples of Ukraine”, which would regulate the specific use of the languages of the indigenous peoples of Ukraine during public, cultural, artistic and other events, in the field of advertising and during election campaigns.

To the State Border Guard Service of Ukraine:

to ensure systematic training for staff on the observance of equal rights and freedoms, and non-discriminatory treatment of individuals, in particular on the grounds of sexual orientation and gender identity.

To the National Police of Ukraine:

to strengthen monitoring of offenders' compliance with the requirement to participate in programmes for offenders, particularly with regard to ensuring timely referral and responding to attempts to evade the programme.

To the regional and Kyiv city military administrations, and local self-government bodies:

to take into account the needs of places of compact residence of the Roma national minority (community) when developing and updating general plans and urban planning documentation, with a view to overcoming spatial segregation and ensuring equal access for residents to transport, engineering and social infrastructure;

to carry out an inventory of land plots and residential buildings in areas where the Roma national minority (community) lives, with a view to regulating land and property relations and establishing a legal basis for the subsequent legalisation of buildings;

to ensure that up-to-date information on the mechanisms for establishing the status of a victim of human trafficking, on the types of state assistance available and where such assistance can be obtained, is published on official websites;

to ensure regular meetings of consultative and advisory bodies, with the inclusion on the agendas of such meetings of issues relating to combating human trafficking within the administrative-territorial unit;

to ensure an even distribution of specialists responsible for implementing the programme for perpetrators, taking into account the number of individuals referred to participate in programmes for perpetrators;

to ensure, on an ongoing basis, that information and awareness-raising activities are organised for representatives of national minorities (communities) with a view to raising their awareness of their guaranteed rights and freedoms, as well as the mechanisms established by law for their implementation.

10. INTERNATIONAL COOPERATION

Number of appeals from Ukrainian citizens from abroad	1,237
Number of meetings of the Commissioner with international partners	126
Number of foreign visits by the Commissioner	22
Number of requests (letters) processed from state authorities within the framework of the European integration process	167
Number of international monitoring visits	13

In 2025, the Ukrainian Parliament Commissioner for Human Rights and the Commissioner's Secretariat carried out active international work amidst the ongoing armed aggression by the Russian Federation, with the aim of protecting human rights and strengthening international support for Ukraine.

The main challenges remained mass human rights violations in the temporarily occupied territories, the deportation and forced displacement of Ukrainian children, the unlawful detention of civilians and prisoners of war, the protection of the rights of the civilian population during the war, and the protection of the rights of Ukrainian citizens abroad.

At the same time, systematic international advocacy regarding the rights of Ukrainian citizens was ensured, the network of the Commissioner's representatives and advisers abroad was significantly expanded, the Commissioner's institution's participation in international and regional networks of national human rights institutions and ombudsman institutions was strengthened, and the Commissioner's role within the framework of Ukraine's European integration was enhanced.

10.1. Cooperation with International Organisations

(a) Public Advocacy and Strategic Dialogue on Human Rights at the International Level

In 2025, the Commissioner spoke at **12 high-level international events** in various countries around the world.

Among the key events: the International Religious Freedom Summit (IRF), dedicated to the protection of religious freedom (February 2025, USA); the 18th annual Lennart Meri Conference, which emphasised the importance of implementing effective mechanisms for documenting war crimes (May 2025, Estonia); The Oslo Forum, where processes of peacekeeping and mediation in armed conflict were discussed (June 2025, Norway); An international conference on combating human trafficking in Ukraine and the USA, focusing on the rise in human trafficking resulting from the Russian Federation's armed aggression (June 2025, USA); The Ukrainian Recovery Conference, at which a separate humanitarian panel emphasised the need for the return of all

unlawfully detained citizens (July 2025, Italy); as well as the International Conference within the framework of the Baku Dialogue on Missing Persons, where Ukraine's experience in the search for and identification of missing persons is presented (October 2025, Azerbaijan).

The Commissioner also took part in a closed high-level session on human rights in Warsaw at the personal invitation of the Council of Europe Commissioner for Human Rights, Michael O'Flaherty (November 2025, Poland). The event took an exceptional expert format and brought together a select group of leading European human rights defenders, representatives of international institutions and the expert community to discuss key challenges in the field of human rights protection in Europe in the context of the ongoing aggression by the Russian Federation against Ukraine. During his address, the Commissioner highlighted the systemic human rights violations caused by Russian aggression and called on international partners to strengthen joint action and coordinate efforts to respond effectively to such violations.

Participation in thematic international conferences facilitated the exchange of best practices regarding the key areas of activity of the Commissioner's Secretariat and the implementation of human rights initiatives.

Particular attention was paid to cooperation with institutions under the auspices of the Council of Europe and the OSCE, particularly regarding the strengthening of human rights protection standards, institutional capacity and the implementation of best international practices in human rights activities.

In 2025, the Commissioner actively advocated for human rights at the international level, aimed at consolidating the international community's efforts to respond to the systematic human rights violations caused by the Russian Federation's armed aggression against Ukraine.

As part of these activities, the Commissioner held **54 bilateral meetings with the heads of international organisations and institutions**, during which issues relating to the protection of the rights of Ukrainian citizens, the documentation of war crimes, the return of illegally deported children, access to Ukrainian prisoners of war, and support for Ukraine on its path to EU membership were discussed.

Among the key meetings:

- with the Council of Europe Commissioner for Human Rights, Michael O'Flaherty – regarding mechanisms for the return of deported Ukrainian children and support for Ukraine on its path to European Union membership;
- with President of the International Committee of the Red Cross, Mirjana Spoljaric Egger and President of the International Federation of Red Cross and Red Crescent Societies, Kate Forbes – regarding ensuring access to places of detention of Ukrainian prisoners of war and facilitating the search for missing persons;
- with Special Envoy of the Secretary General of the Council of Europe on the situation of children of Ukraine, Thórdís Kolbrún Gylfadóttir – regarding the coordination of international efforts to return Ukrainian children;
- with the Secretary General of the Organisation for Security and Co-operation in Europe, Feridun Sinirlioğlu – regarding the strengthening of international monitoring of human rights compliance, the application of the OSCE Moscow Mechanism and the documentation of war crimes;

- with High Commissioner of the Office of the United Nations High Commissioner for Refugees, Filippo Grandi – regarding the implementation of programmes to support internally displaced persons and protect the rights of Ukrainian refugees abroad;
- with the Director of the European Union Agency for Fundamental Rights – regarding the harmonisation of the Ukrainian human rights protection system with European Union standards.

These meetings contributed to strengthening international support for Ukraine, activating mechanisms to respond to human rights violations, and consolidating international efforts to hold the Russian Federation accountable for the crimes committed.

In addition, the management of the Commissioner's Secretariat and the Commissioner's Representatives (Deputies) for specific areas of activity held **44** working meetings with representatives of international organisations operating in Ukraine, with the aim of coordinating cooperation and discussing human rights protection issues in the relevant fields.

Cooperation with international organisations in the security and defence sector remains a separate priority. Together with the Council of Europe, the Organisation for Economic Co-operation and Development (OECD), and UN agencies, projects were implemented to protect the rights of servicemen, veterans and their family members. Cooperation with the Geneva Centre for Democratic Control of Armed Forces (DCAF), EUROMIL and other expert networks has facilitated the implementation of global best practices in veterans' policy and humanitarian law in the national context.

(b) Representation at UN and EU Platforms

During **2025**, the Commissioner, his Representatives (Deputies) and staff of the Commissioner's Secretariat actively participated in international events aimed at mobilising the international community to respond to war crimes of the Russian Federation, in particular regarding violations of the rights of the civilian population, executions, the use of torture and ill-treatment of prisoners of war, the deportation and forcible displacement of Ukrainian children, as well as the unlawful detention of civilians.

Systematic engagement with the monitoring mechanisms of the Council of Europe and UN structures, particularly in the context of monitoring compliance with the provisions of the Istanbul Convention and the International Convention on the Elimination of All Forms of Racial Discrimination, has become a significant component of international activities. In particular, representatives of the institution took part in the work of the **69th session of the UN Commission on the Status of Women**. As part of this session, a side event was organised jointly with the Permanent Missions of Canada and the Kingdom of Norway to the UN. The event addressed the systematic violations of Ukrainian women's rights in the context of the Russian Federation's armed aggression against Ukraine, including instances of torture and sexual violence against female prisoners of war, as well as the psychological and economic challenges faced by women whose relatives have gone missing.

A significant area of the Commissioner's work has been his participation in sessions of the UN Human Rights Council, where he delivered keynote speeches and took part in a range of thematic events. In particular, during the 58th session of the UNHRC,

the Commissioner took part in interactive dialogues with the Special Representative of the UN Secretary-General for children and armed conflict, Virginia Gamba, with the UN Special Rapporteur on Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment, Dr Alice Jill Edwards, and also took part in the discussion of the oral update on Ukraine by the UN High Commissioner for Human Rights, Volker Türk. During the 59th session of the UNHRC, the Commissioner took part in an interactive dialogue with the Special Rapporteur on the human rights of internally displaced persons and spoke during the consideration of the High Commissioner's oral report on the human rights situation in Ukraine and the Secretary-General's interim report on the human rights situation in Crimea. In addition, the Commissioner spoke at the 60th session of the UNHRC, where he took part in interactive dialogues with the UN Independent International Commission of Inquiry on Ukraine and the UN High Commissioner for Human Rights, and also carried out separate advocacy work during the intersessional interactive dialogue on the human rights situation in Ukraine.

Parliamentary diplomacy remained a key area of focus. The Commissioner addressed a meeting of the European Parliament's Subcommittee on Human Rights (DROI) and encouraged systematic engagement with members of the Parliamentary Assembly of the Council of Europe, raising the issue of protecting Ukrainian children who have been forcibly displaced and deported by the Russian Federation during numerous bilateral meetings.

(c) Monitoring, Reporting and Assisting with the Documentation of Violations

The Secretariat regularly prepares and submits reports and comments to international organisations such as the UN OHCHR, the OSCE, the Council of Europe, the UN Human Rights Monitoring Mission and others. These documents highlight gross violations of human rights and international humanitarian law committed by the Russian Federation, particularly in the temporarily occupied territories.

Throughout 2025, the key areas of reporting were::

- **The OSCE Moscow Mechanism:** preparing materials on the legal and humanitarian consequences of the Russian Federation's aggression;
- **The OSCE ODIHR's Seventh Interim Report (2025):** providing information on systematic human rights violations in the occupied territories;
- **UN OHCHR reports:** participation in the preparation of materials on the human rights situation in Ukraine (in particular for the period June–November 2025);
- **Protection of children's rights:** provision of data for the UN Secretary-General's Thematic Report on the Rights of the Child (for consideration at the 80th session of the UN General Assembly) and HRMMU Reports on the impact of the conflict on children's rights;
- **UN Independent International Commission of Inquiry on Ukraine:** reviewing and providing comments on draft reports on the human rights situation in Ukraine, in particular regarding the situation in the TOT of Ukraine, with regard to prisoners of war, unlawfully detained civilians and deported children.

Within the framework of international humanitarian law, the Commissioner's Secretariat maintained an ongoing dialogue with the International Committee of the Red Cross (ICRC) and the International Commission on Missing Persons (ICMP). Joint efforts

focused on resolving issues relating to the search for persons missing under special circumstances, the protection of the rights of prisoners of war, and support for the civilian population. Furthermore, the institution ensured the humanitarian dimension within the negotiation process for a peaceful settlement with the Russian Federation, in particular within the Istanbul negotiation format, where a Representative (Deputy) of the Commissioner was included in the Ukrainian delegation.

Systematic cooperation with the Office of the UN High Commissioner for Human Rights and the UN Monitoring Mission has made it possible to strengthen the protection of persons affected by armed aggression. Participation in intergovernmental conferences and strategic sessions on international humanitarian law under the auspices of relevant European committees has confirmed the institution's role as a key actor in addressing complex human rights challenges at the international level.

The Commissioner continues on an ongoing basis to inform international organisations about facts of human rights violations and war crimes committed by the Russian Federation on the territory of Ukraine.

In particular, following each documented instance of such violations, the Commissioner's Secretariat prepares and sends relevant information letters and appeals to international partners, including the United Nations, the International Committee of the Red Cross and other international human rights bodies.

Separately, a monthly newsletter containing summarised information is distributed via a wide network of international partners and contacts, as well as the diplomatic missions of foreign partner states. This network comprises **1,501** recipients, enabling the international community to be promptly informed of violations, facilitating their international documentation and strengthening the international response.

10.2. Cooperation with National Human Rights Institutions

(a) Membership of International Networks of Ombudsman Institutions and National Human Rights Institutions

International cooperation with national human rights institutions and ombudsman institutions in other countries is a vital tool for strengthening the institutional capacity of the Ukrainian Parliament Commissioner for Human Rights, implementing international human rights standards, and responding effectively to systemic violations of human and citizen rights and freedoms.

As of 2025, the Commissioner is a member of key international and regional networks of national human rights institutions and ombudsman institutions, including:

- Global Alliance of National Human Rights Institutions (GANHRI);
- European Network of National Human Rights Institutions (ENNHRI);
- International Ombudsman Institute (IOI);
- European Network of Ombudspersons for Children (ENOC);
- Association of Mediterranean Ombudsmen (AOM);
- European Network of Equality Bodies (EQUINET);
- European Network of Ombudsmen (ENO).

Membership of these international associations ensures the integration of the Ukrainian NHRI into the global and European human rights protection system, facilitates the exchange of best practices, and increases the level of international solidarity with Ukraine in the context of the Russian Federation's armed aggression.

The Commissioner's active role in the international human rights community is confirmed by his election to leadership positions in leading international associations of national human rights institutions.

In March 2025, the Commissioner took up the post of Board Member of the European Network of National Human Rights Institutions (ENNHRI) and was also elected as an alternate member of the Bureau of the Global Alliance of National Human Rights Institutions (GANHRI).

In June 2025, the Commissioner was elected as a member of the IOI World Board — the largest global association, comprising **238** ombudsman institutions from around the world.

Holding these positions provides Ukraine with an effective tool for influencing the shaping of the international human rights agenda, initiating the consideration of issues prioritised for the state, systematically promoting Ukraine's position at the international level regarding holding the aggressor state to account, and integrating issues relating to the war and its humanitarian consequences into global discussions, as well as contributing proposals to the content of recommendations and position papers of relevant international networks. At the same time, such participation contributes to strengthening Ukraine's European integration course and ensures the alignment of national legislation with European Union standards and international human rights standards.

Within the framework of international activities, particular attention was paid to cooperation with the European Network of Equality Bodies (EQUINET), which is an important platform for European expert dialogue in the field of ensuring equality and combating discrimination. The partnership was aimed at exchanging best practices, strengthening institutional capacity and harmonising Ukraine's approaches with European Union standards. Key areas of cooperation included digital accessibility, the regulation of artificial intelligence and the improvement of mechanisms to prevent discrimination.

As an associate member of ENOC, the Commissioner implements the ENYA initiative annually, which ensures the participation of children and young people in shaping decisions regarding the protection of their rights. In 2025, the national phase of the project was dedicated to the theme 'Children's Right to Physical Health' and included seven meetings with teenagers aged 14–17. During the meetings, issues of mental health, inclusion, sex education and access to healthcare were discussed. Following the discussions, participants formulated **10** recommendations and identified one key recommendation that most accurately reflects the needs of Ukrainian youth. These findings were presented at the ENYA 2025 Forum and became part of the international discussion at the ENOC General Assembly and Annual Conference.

The Commissioner continues to promote the integration of Ukrainian human rights experience into the European and global human rights landscape.

(b) Participation in International Working Groups

Employees of the Commissioner's Secretariat are members of thematic working groups within international associations of national human rights institutions, which ensures ongoing expert collaboration, the exchange of best practices, and the development of joint approaches to current human rights challenges.

In particular, employees of the Commissioner's Secretariat are members of and participate in the activities of the following working groups:

- GANHRI Working Group on Business and Human Rights (GANHRI WG on Business and Human Rights);
- GANHRI Caucus on Human Rights and Climate Change;
- GANHRI Working Group on Ageing and the Human Rights of Older Persons (GANHRI OEWGA WG);
- ENNHRI Working Group on Artificial Intelligence (AI WG);
- ENNHRI Working Group on Asylum and Migration (A&M WG);
- ENNHRI Working Group on Convention on the Rights of Persons with Disabilities (CRPD WG);
- ENNHRI Working Group on the Rights of Older Persons (HROP WG).

During 2025, employees of the Commissioner's Secretariat, as members of the working groups, carried out active expert work aimed at implementing human rights initiatives and fulfilling Ukraine's international obligations.

As part of the activities of the ENNHRI Working Group on Disability, information was provided on the results of the Commissioner's parliamentary oversight in the field of protecting the rights of persons with disabilities and older persons for the working group's periodic (quarterly/half-yearly) newsletters, and ensured participation in thematic meetings, during which members of the working group were provided with information regarding the Commissioner's involvement in the shaping of state policy, in particular regarding a barrier-free society.

Employees of the Commissioner's Secretariat took part in meetings of the ENNHRI Working Group on Artificial Intelligence, during which discussions were held on the challenges in the field of the application of artificial intelligence technologies, their impact on human rights, and the role of national human rights institutions in shaping relevant policies and oversight mechanisms.

In addition, together with European colleagues, they participated in the development of the ENNHRI Artificial Intelligence Tool, designed to support national institutions in monitoring, analysing and responding to human rights risks associated with the implementation of artificial intelligence systems.

Participation in working groups facilitates the implementation of international standards into national human rights practice, as well as the shaping and promotion of Ukraine's position on key thematic areas at the international level.

(c) Bilateral International Cooperation

In 2025, cooperation was established with the newly appointed Chief Ombudsman of the Republic of Türkiye, Mr. Mehmet Akarca, regarding the return of Ukrainian prisoners of war and civilians unlawfully detained by the Russian Federation.

As part of this cooperation, an online meeting was held at the end of the year with the Chief Ombudsman of Türkiye, with the participation of coordinators of the families

of Defenders of Ukraine. During the discussion, emphasis was placed on the Russian Federation's gross violations of international humanitarian law, in particular the Geneva Conventions, including the unlawful sentencing of Ukrainian prisoners of war, and agreements were reached regarding the transfer and verification of lists of prisoners and missing persons, as well as the establishment of a permanent channel of communication with the Russian side.

This meeting marked the start of a new approach to international advocacy on the return and proper treatment of prisoners of war among ombudsmen from other countries and laid the foundation for a regular format of interaction between the families of prisoners and foreign institutions.

At the same time, the development of the Commissioner's international activities in 2025 was aimed not only at advocating for humanitarian issues related to the armed aggression against Ukraine, but also at systematically strengthening the institutional capacity of the Secretariat through partnerships with leading European human rights institutions.

Thus, as part of the implementation of the Memorandum of Understanding with the Danish Institute for Human Rights, two study visits by representatives of the Commissioner's Secretariat to Copenhagen, Kingdom of Denmark, took place in 2025. During the visits, Secretariat staff had the opportunity to familiarise themselves with the functioning of the national human rights protection system in Denmark, as well as to gain practical experience in the areas of monitoring, analytical work and international cooperation.

A further step in expanding the international expert partnership was the signing in 2025 of a Memorandum of Understanding between the Secretariat of the Ukrainian Parliament Commissioner for Human Rights and the Raoul Wallenberg Institute of Human Rights and Humanitarian Law. As part of this cooperation, a study visit took place to Vienna, Republic of Austria, the main aim of which was to provide the Secretariat's delegation with practical knowledge regarding international and European human rights standards, mechanisms for their implementation at national and local levels, and to familiarise them with relevant best practices. The visit focused on studying the experience of institutions operating at regional, national and local levels, whilst also serving as a platform for presenting and disseminating the Ukrainian side's achievements.

(d) Strengthening the Institutional Role of the Commissioner in the Field of Protecting the Rights of Persons with Disabilities

On 18 December 2025, the UN General Assembly adopted Resolution 80/214, recognising the key role of national human rights institutions in promoting, protecting, monitoring and reporting on the rights of persons with disabilities, and called on states to establish NHRIs as independent monitoring mechanisms in accordance with the UN Convention on the Rights of Persons with Disabilities (hereinafter – the Convention). The resolution emphasises the need to accelerate the establishment of NHRIs that comply with the Paris Principles and calls on all Member States to establish effective, independent, pluralistic and adequately resourced NHRIs or, where they already exist, to strengthen them.

The Commissioner exercises parliamentary oversight over the observance of human and citizen rights and freedoms, in particular the rights of persons with disabilities, participates in the formation of state policy and influences the substance of regulatory and legal acts in this sphere. At the same time, at the legislative level, the Commissioner is not currently defined as an independent mechanism for monitoring the implementation of the Convention in accordance with Article 33.

In view of Ukraine's international obligations, the state's European integration course and the recommendations of the UN General Assembly, it is appropriate to enshrine in law the Commissioner's status as an independent mechanism for monitoring the implementation of the Convention. Granting such a mandate will ensure systematic, institutionally independent and comprehensive monitoring of the observance of the rights of persons with disabilities, strengthen coordination with international mechanisms and enhance the effectiveness of the implementation of the Convention's standards in Ukraine.

10.3. Interaction with Foreign Diplomatic Missions and Protocol

(a) Engaging International Partners to Support Human Rights in Ukraine

In 2025, interaction between the Ukrainian Parliament Commissioner for Human Rights and foreign diplomatic missions was one of the key areas of the institution's international activities and an important tool for consolidating international support for Ukraine in the field of human rights protection amid the ongoing armed aggression by the Russian Federation.

The main focus was on systematically informing the international community about the state of human rights in Ukraine, documenting and recording gross violations of international humanitarian law and international human rights law, as well as intensifying international political and diplomatic pressure on the aggressor state.

During the reporting year, the Commissioner and the management of the Commissioner's Secretariat held a total of **52** meetings with the Ambassadors Extraordinary and Plenipotentiary of foreign states accredited in Ukraine. In addition, meetings were held with high-level foreign delegations in bilateral and multilateral formats, comprising heads of state, heads of government and members of government, parliamentarians and representatives of relevant parliamentary committees, special representatives on human rights, international humanitarian law and humanitarian policy, as well as other senior officials responsible for formulating and implementing foreign policy and sanctions decisions.

The key themes of the Commissioner's international meetings in 2025 were systemic human rights violations resulting from the Russian Federation's armed aggression, in particular the unlawful detention of civilians, enforced disappearances, the deportation of Ukrainian children, violations of the rights of prisoners of war, torture, sexual violence and persecution in the temporarily occupied territories.

Informing international partners was aimed at raising awareness of the scale of violations, forming a consolidated international position, supporting sanction mechanisms, and strengthening tools for holding those responsible to account.

Significant attention was paid to coordinating efforts to ensure unimpeded access for international humanitarian organisations to places where civilians and prisoners of war are held, establishing effective international mechanisms for monitoring places of detention, and supporting the return of illegally detained Ukrainian citizens.

As part of interaction with foreign diplomatic missions in Ukraine, information was provided on specific humanitarian cases requiring international assistance. This approach enables a rapid response to new challenges, ensures the transmission of information through diplomatic channels, and engages partners in resolving specific issues related to establishing the whereabouts of detainees, facilitating their release, or ensuring they receive appropriate medical care.

Separately, the Commissioner briefed foreign diplomatic missions on Ukraine's compliance with its international human rights obligations under martial law, emphasising Ukraine's commitment to the principles of the rule of law, transparency and accountability.

In 2025, the Commissioner's Secretariat prepared and distributed general and thematic information brochures in Ukrainian and English on a monthly basis, providing detailed coverage of the current human rights situation in Ukraine and systematic human rights violations by the Russian Federation. These materials were regularly sent by email to international partners and diplomatic missions of foreign states, reaching **1,501** recipients, with the aim of raising awareness and international support in the field of human rights protection.

In December 2025, with the aim of drawing the attention of the international human rights community to human rights violations in Ukraine, the Commissioner's Secretariat, together with partners, organised an International Human Rights Conference to mark Human Rights Day, entitled 'Lessons from Ukraine for the World: New Challenges in the Field of Human Rights'.

The event brought together **3,157** participants, both in person and online, from all regions of Ukraine, as well as representatives of foreign diplomatic missions, international and national partners, state authorities, human rights organisations, civil society, the academic community and the media. Particular attention was paid to discussing systematic human rights violations by the Russian Federation and mechanisms for an international response.

Events marking Human Rights Day were also held in a number of foreign countries, including Austria, Poland, Luxembourg, Norway, Armenia, Bulgaria, Georgia, Portugal, the United Kingdom of Great Britain and Northern Ireland, Canada and the Czech Republic, which helped to raise international awareness and consolidate partnerships in the field of human rights protection.

The systematic and consistent organisation of monthly briefings, regular meetings with Ambassadors Extraordinary and Plenipotentiary of foreign states and senior foreign officials, as well as the holding of international human rights events, helped maintain a high level of international attention to human rights violations, ensured the continued presence of the Ukrainian issue on the international human rights agenda, and strengthened the coordination of partners' efforts to protect victims and restore justice.

(b) Coordination of the Working Group on the Human Dimension of the President of Ukraine's Peace Formula and the International Coalition for the Return of Ukrainian Children

In 2025, the **Working Group on the Human Dimension** (hereinafter referred to as the Working Group) continued its work as a permanent international coordination platform bringing together representatives of the Ukrainian public sector, international and non-governmental organisations, as well as foreign diplomatic missions in Ukraine, with the aim of protecting human rights. Ukraine, Canada and Norway remained the permanent co-chairs of the Working Group, ensuring strategic planning and coordination of joint international actions.

In 2025, the Working Group's priority areas of activity were: developing effective mechanisms for the release of Ukrainian citizens held captive by the Russian Federation; the return of unlawfully displaced and deported children from the territory of the Russian Federation and the temporarily occupied territories of Ukraine; the establishment and operation of a Register of Deported Children; and ensuring their reintegration and providing comprehensive support to returnees.

During the reporting year, **4** meetings of the Working Group were held, including the first regional meeting at the Human Rights Protection Centre in Zhytomyr, which contributed to strengthening the practical and regional dimensions of international cooperation in the field of human rights protection. The following issues were discussed during the meetings:

- the release of Ukrainian prisoners of war and unlawfully detained civilians;
- the return of deported and forcibly displaced Ukrainian citizens, including children;
- the identification of places of detention and relocation of citizens currently in the Russian Federation or in the temporarily occupied territories of Ukraine;
- the establishment and operation of relevant registers;
- the coordination of advocacy efforts and the use of diplomatic channels to ensure the return of citizens.

To ensure maximum awareness among international partners, returned prisoners of war were invited to the Working Group's meetings, where they gave personal testimony regarding the inhumane conditions of their captivity in Russia and gross human rights violations.

At the same time, specific mechanisms were developed to address these issues, involving practical steps to coordinate actions through diplomatic channels and intermediaries, notably due to the successful mediation of the State of Qatar and the First Lady of the United States of America, Melania Trump, in the return of Ukrainian children.

Each country that joined the Working Group had the opportunity to develop and implement specific solutions to address all aspects of the Working Group's work on the human dimension.

The main areas of focus included:

- coordinating efforts at the level of the United Nations and other international organisations;
- advocacy, in particular expanding the range of platforms for discussing the return of citizens to Ukraine;

- identifying and locating the places of detention and transfer of Ukrainian citizens who are in the Russian Federation or in the temporarily occupied territories;
- ensuring direct access and mechanisms for the return of citizens;
- integration and rehabilitation of Ukrainian citizens upon their return home;
- informing the international community about the crimes of the Russian Federation, in particular war crimes, crimes against humanity and gross violations of international humanitarian law, including the Geneva Conventions, as well as facilitating the bringing those responsible to justice and the application of state responsibility.

Due to the significant expansion of the regional network of the Commissioner's representations, particularly with the support of international partners, access to human rights assistance for Ukrainian citizens on the ground has been greatly enhanced, which has facilitated more effective coordination of international and national efforts in the field of human rights protection.

With the assistance of the governments of the Republic of Korea, the Kingdom of Norway and the French Republic, Child Rights Protection Centres have been opened in the cities of Rivne, Dnipro, Lutsk and Kharkiv, providing comprehensive support to children affected by deportation and forcible displacement. The centres provide legal, psychological and social support, facilitate the reintegration of children into society and provide advocacy mechanisms at local and national levels.

On the initiative and with the support of the Republic of Latvia and the Republic of Estonia, Human Rights Protection Centres have been opened in Chernihiv and Zhytomyr, providing legal and psychological assistance to adults affected by violence, deportation and unlawful detention, as well as serving as platforms for providing advice to families and civil society organisations.

The centres established have become key regional platforms for implementing human rights initiatives, including advocacy for the return of deported Ukrainian children, ensuring their reintegration, and the systematic exchange of information between Ukrainian and international partners.

A separate area of work in 2025 remained the activities of the **International Coalition for the Return of Ukrainian Children** (hereinafter – the International Coalition), established as part of the President of Ukraine's Bring Kids Back UA initiative. In 2025, the International Coalition continued to expand its membership and deepen cooperation between states, international organisations and non-governmental bodies.

The Commissioner participates in the activities of the International Coalition as an independent national human rights institution, providing human rights support, verifying information on violations of children's rights, and engaging in international advocacy.

The International Coalition has functioned as a key instrument for the international mobilisation of efforts to locate, return and reintegrate deported and forcible displaced Ukrainian children, facilitating the coordination of political, legal and humanitarian measures at bilateral and multilateral levels.

By the end of 2025, the International Coalition comprised **46** members, including **43** states and **3** international organisations, as well as **4** states with observer status, reflecting the initiative's steady geographical expansion and growing international support for the consolidation of efforts in the humanitarian and human rights spheres.

During 2025, the Principality of Andorra and the Principality of Monaco joined the International Coalition as member states. At the same time, leading international institutions such as the Council of Europe, the European Union and the OSCE Parliamentary Assembly joined the Coalition, which significantly strengthened the institutional dimension of cooperation and facilitated further coordination of international efforts.

The involvement of the First Lady of the United States of America, Melania Trump, played a significant role in the international advocacy for the return of Ukrainian children in 2025. In October 2025, in a statement, the First Lady of the United States announced the establishment of an open channel of communication with representatives of the Russian Federation with the aim of facilitating the return of Ukrainian children to their families. In doing so, she publicly acknowledged the Commissioner as a key national partner in these efforts. This stance underscores the international recognition of the Commissioner's role in coordinating advocacy, protecting children's rights, and facilitating their return and reintegration.

Successful interaction with international partners, namely: the State of Qatar, with whose assistance **83 Ukrainian children** were returned to Ukraine, US First Lady Melania Trump, and the governments of the Coalition's member states, has highlighted the importance of a systematic international response to human rights violations and reaffirmed Ukraine's role as an active participant in global humanitarian and human rights cooperation.

10.4. Respect for the Rights of Ukrainian Citizens Abroad

10.4.1. Ukrainian Citizens Abroad

Russia's full-scale invasion of Ukraine has caused one of the largest migration crises in modern European history. According to the Office of the United Nations High Commissioner for Refugees, **5,923,870** Ukrainians have been forced to leave the country in search of temporary international protection. According to the latest data of the Office of the United Nations High Commissioner for Refugees, as of December 2025, the number of displaced Ukrainian citizens in countries in Europe stood at **5,374,780** people, with a further **549,090** people in other countries (primarily the US and Canada).

According to the Ministry of Foreign Affairs of Ukraine, as of 19 December 2025, there are **8,488,000** Ukrainian citizens abroad, of whom **6,239,000** are in European Union countries. There are **392,142** Ukrainian citizens registered with the consular services of Ukraine's diplomatic missions abroad, of whom **39,760** are children, specifically, in EU countries there are **246,924** citizens, of whom **24,609** are children.

These figures indicate a significant increase in the number of Ukrainian citizens abroad compared to the end of 2024, when, according to UNHCR data, this figure stood at **over 6.8 million** people.

According to data from the Ministry of Foreign Affairs of Ukraine, as of 19 December 2025, the countries with the largest numbers of Ukrainian citizens are: the Republic of Poland – **1,506,470**, the Federal Republic of Germany – **1,392,260**, the

United States of America – **700,000**, the Czech Republic – **581,184**, Canada – **408,248**, the Italian Republic – **400,023**, Kingdom of Spain – **326,424**, United Kingdom of Great Britain and Northern Ireland – **250,000**, Slovak Republic - **246,424**, Hungary - **245,000**, Romania - **197,699**, Republic of Moldova - **160,000**, French Republic - **150,350**, Republic of Austria - **146,500**, Kingdom of the Netherlands - **130,000**, Ireland - **122,125**, Republic of Finland - **91,447**, Portuguese Republic - **87,250**, Kingdom of Norway – **86,500**, Republic of Lithuania – **79,548**, Kingdom of Belgium – **74,448**, Kingdom of Sweden – **73,223**, Swiss Confederation – **69,906**, Republic of Bulgaria – **67,014**, Hellenic Republic - **60,000**, Republic of Estonia - **60,000**, Republic of Latvia - **58,673**, Kingdom of Denmark - **56,000**, Republic of Croatia - **32,512**, Republic of Turkey – **31,658**, Republic of Cyprus – **31,650**, Republic of Albania – **15,118**, Republic of Slovenia – **14,480**, Montenegro – **8,127**, Grand Duchy of Luxembourg – **5,448**, Republic of Iceland - **4,372**, Republic of Serbia - **3,285**, Republic of Malta - **3,000**, Principality of Liechtenstein - **696**, Republic of North Macedonia - **507**, Bosnia and Herzegovina - **161**.

10.4.2. Expanding the Network of the Commissioner’s Representatives and Advisers Abroad

In view of the growing number of Ukrainian citizens residing abroad, particularly those who were forced to leave the country due to the Russian Federation’s armed aggression against Ukraine, and with the aim of strengthening institutional capacity to ensure the proper protection of the rights and freedoms of Ukrainian citizens, the Ukrainian Parliament Commissioner for Human Rights undertook a major expansion of its network of representatives and advisers abroad in 2025.

Until early 2025, the Commissioner’s activities abroad were carried out through an institution of representatives who maintained constant interaction with national human rights institutions and Ukrainian communities in the following countries: the Republic of Poland, the United Kingdom of Great Britain and Northern Ireland, the Grand Duchy of Luxembourg, the Slovak Republic, the Kingdom of Spain, and the Republic of Moldova.

In 2025, the network was significantly expanded through the appointment of the Commissioner’s advisers abroad, which made it possible to considerably broaden the geographical scope of protection for the rights of Ukrainian citizens. Advisers operate in the following countries: Canada, Georgia, the Kingdom of Norway, the Republic of North Macedonia, the Republic of Estonia, the Republic of Armenia, the Kingdom of Belgium, the Czech Republic, the Portuguese Republic, the Republic of Bulgaria, the Kingdom of Denmark, the Republic of Austria, the Italian Republic, the Kingdom of Sweden, the Hellenic Republic, the Federal Republic of Germany (two advisers), the Republic of Serbia, and the United States of America.

The legal basis for the activities of the Commissioner’s representatives and advisers abroad is the Regulation on the Temporary Representation of the Ukrainian Parliament Commissioner for Human Rights Abroad for the Period of Martial Law in Ukraine, approved by Order of the Commissioner No. 85.15/22 of 20 October 2022 (as amended by Order No. 1.15/1/25 of 2 January 2025). In accordance with the aforementioned Regulation, the Commissioner’s temporary representation abroad is provided by the Commissioner’s representatives and advisers, who carry out their activities on a voluntary

basis within the country of residence, i.e. without additional expenditure from the state budget of Ukraine.

Consequently, during 2025, the number of individuals involved in the Commissioner's international human rights network abroad increased from 6 representatives to 25 representatives and advisers, which significantly strengthened the state's capacity to respond to violations of the rights of Ukrainian citizens abroad.

10.4.3. Protection of the Rights of Ukrainian Citizens Abroad

Citizens' ties with Ukraine must not be severed, regardless of the place where they reside, and the state is obliged to guarantee the protection of their rights, as well as to respond promptly to any instances of their violation through the effective work of state authorities and diplomatic missions abroad.

The protection of the rights and interests of Ukrainians abroad remains one of the Commissioner's priorities for 2025. A key example of upholding the rights of Ukrainians abroad is the case of Serhiy Kuznetsov, who is suspected of sabotaging the Nord Stream gas pipeline.

Since the beginning of November 2025, the situation regarding the observance of the rights of Serhiy Kuznetsov in the territory of the Italian Republic and the Federal Republic of Germany has been under constant control of the Commissioner due to reports of inadequate conditions of detention, possible violations of procedural rights, and the critical health condition of the detainee.

Following Serhiy Kuznetsov's announcement of a hunger strike on 31 October 2025, the Commissioner sent a series of official letters to European Union institutions, judicial bodies, national human rights institutions and penitentiary institutions in Italy and Germany, as well as to the Ministry of Foreign Affairs of Ukraine. The letters were aimed at ensuring compliance with international humanitarian law and procedural safeguards, inspecting detention conditions, monitoring his state of health, ensuring his spiritual and informational needs were met, and providing adequate legal protection for the Ukrainian citizen.

As a result, on 11 November, Serhiy Kuznetsov agreed to end his hunger strike following the partial fulfilment of his demands.

As of the end of 2025, the situation regarding the observance of the rights of Ukrainian citizen Serhiy Kuznetsov, who is currently in Germany, is under constant control of the Commissioner.

The Commissioner was addressed by a Ukrainian citizen, Mr E., who found himself in extremely difficult life circumstances while staying in the Italian Republic. The applicant suffers from numerous chronic illnesses, requires systematic treatment and constant medical supervision. However, due to a lack of housing and adequate social support, he is actually deprived of the opportunity to exercise his right to healthcare and decent living conditions.

The Commissioner's Secretariat responded comprehensively and decisively to this appeal. Following a detailed analysis of the situation and the identification of risks to the applicant's life and health, official communication was immediately initiated with the Ministry of Foreign Affairs of Ukraine, demanding that all measures provided for by law be taken to protect the rights of a Ukrainian citizen abroad.

Due to the Commissioner's firm stance and constant monitoring of the processing of the appeal, the Consulate General of Ukraine in Naples stepped up its cooperation with the competent authorities of the Italian Republic. Communication was established with social services and local authorities to ensure the applicant had access to medical care and to resolve the issue of accommodation.

As a result of systematic coordination of actions and constant monitoring of the case by the Commissioner, citizen Mr. E. was provided with free medical treatment, the necessary nutrition in accordance with medical recommendations, and guaranteed access to social services.

The resolution of the housing issue is particularly illustrative. Taking into account that social housing in Italy is usually provided by the prefecture to families with two or more children, it was unlikely that a single person would be granted such accommodation. However, it was precisely due to the response process initiated by the Commissioner's Secretariat, active diplomatic engagement and a well-reasoned justification of the situation that an exception was made for the applicant, as a result of which he was granted social housing.

In 2025, Ukrainian citizens residing in a private centre in the Italian Republic addressed the Commissioner. Their appeal concerned the prolonged non-payment of the daily allowance of 2.5 euros, as stipulated in the terms of their stay, which was to be provided by the local organisation. The arrears had accumulated over a year and covered the years 2024 and 2025, which significantly affected the residents' material support.

The situation showed signs of a systemic violation of rights, as these payments are a vital component of the minimum social security for persons staying in accommodation centres. As part of parliamentary oversight, the Commissioner's Secretariat initiated an official response and addressed the Ministry of Foreign Affairs of Ukraine, demanding that it facilitate the immediate resolution of the issue through diplomatic channels.

Further work was carried out in close cooperation with the Embassy of Ukraine in the Italian Republic. Due to persistent communication with the centre's administration and representatives of the relevant organisations, it was possible to achieve full repayment of the debt for 2024.

Consequently, the residents' right to receive the proper funds for this period has been restored, and the Commissioner's consistent position and coordinated interstate

cooperation are delivering practical results in the protection of the social and economic rights of Ukrainian citizens abroad.

10.4.4. Safeguarding the Rights of Persons Who are Forced to Stay Abroad

(a) An Overview of the Situation and Key Trends

Forced displacement has primarily affected women, children, the elderly and people with disabilities, who face particular challenges in integrating into their countries of residence. This demographic structure of migration affects not only social stability but also Ukraine's long-term demographic prospects, particularly in view of the decline in the birth rate in the context of the war.

Large-scale population displacement has become a serious challenge for state policy in the field of human rights. Ukraine faces a dual task: to ensure the protection of citizens' rights abroad and, at the same time, to create the conditions for their return and reintegration. Despite institutional changes in the system of executive authorities in 2024–2025, Ukraine still lacks a comprehensive strategy for protecting the rights and freedoms of citizens who have moved abroad as a result of the Russian Federation's armed aggression, as well as a coordinated state policy on creating conditions for their return. The situation is complicated by the diversity of host countries, differences in legal regulation and a lack of systematic data on the real needs of Ukrainians abroad, which necessitates a strategic and inter-agency approach. The Commissioner has repeatedly drawn the Government's attention to the need to develop such a strategy; in May 2025, the relevant authority at the time announced the commencement of work on this.

In addition, in December 2024, the MNE initiated the creation of a network of national unity hubs abroad as a tool to support Ukrainian communities, strengthen communication between Ukrainian citizens residing outside the country and Ukrainian institutions, and preserve national identity. In parallel, work began on developing the Unity App digital platform, which was supposed to become the single point of access to information for Ukrainians planning to return. At the same time, in 2025, following the reorganisation of the MNE, this issue was raised again at a meeting on 12 September 2025 with representatives of the MinCult.

The lack of a comprehensive state strategy, the fragmented nature of institutional initiatives and limited coordination between public authorities necessitate an objective assessment of the actual situation of Ukrainians abroad, as well as the effectiveness of existing mechanisms for protecting their rights and freedoms.

For this reason, the Commissioner's Secretariat carries out periodic monitoring of the situation of Ukrainians abroad and conducts comprehensive research on access to education, healthcare, social protection and employment, as well as the factors influencing decisions to return. The results of this work are presented in the Analytical Report "Forced Displacement Abroad".

The findings of the study, based on the real-life stories and experiences of over 4,000 respondents, indicate that 25% of those surveyed plan to return to Ukraine, 16% are considering a life split between the two countries, 38% have settled in their countries of residence and do not currently plan to return, whilst a further 21% remain undecided.

Around 87% have temporary protection status or equivalent, which grants access to basic rights, a further 6% have refugee status, and 4% hold a temporary residence permit.

Moreover, in 2025, representatives of the Commissioner's Secretariat held **four open dialogue meetings with Ukrainian citizens and representatives of civil society organisations**, two of which took place in the Swiss Confederation and two in the Kingdom of Norway.

During these events, relevant issues regarding the observance of the rights of Ukrainian citizens residing abroad were discussed, in particular access to social guarantees, education, employment and interaction with the authorities of the host countries.

Participation in these events contributed to strengthening international advocacy for the interests of Ukrainian citizens, developing cooperation with the civil society of the Ukrainian diaspora, and coordinating interaction with European Union institutions and national authorities of foreign states in the field of human rights protection.

Despite the generally high level of support from EU Member States and partner countries, issues such as the language barrier, integration challenges and legal uncertainty regarding future status remain relevant, particularly with regard to the extension of temporary protection until 2027. Already in the next reporting period, a significant number of citizens will be forced to make strategic decisions regarding their future place of residence.

The text below outlines only some of the issues relating to access to consular services faced by Ukrainians abroad, and regarding which the Commissioner's Secretariat has received appeals.

(b) Problems Accessing Consular Services via the 'e-Consul' System

During a visit to the Italian Republic in September 2025, difficulties were identified in accessing consular services for some Ukrainian citizens due to the use of the 'e-Consul' information and communication system. Taking into account that authorisation in the system is carried out via Diia.Signature, BankID or a qualified electronic signature, for certain categories of citizens this creates practical barriers to accessing the electronic queue and submitting documents remotely.

In response to the Commissioner's appeal, the Ministry of Foreign Affairs reported that the 'e-Consul' system provides for the possibility of authorisation via BankID following video verification at Ukrainian banking institutions, and also informed of joint work with the State Tax Service on the introduction of an electronic service for obtaining a taxpayer registration number via 'e-Consul'. Furthermore, it was noted that the current procedure provides for an alternative mechanism for enrolling in the electronic queue – with the involvement of a consular official in cases where electronic identification is not possible.

At the same time, monitoring results indicate that, in practice, citizens are not always informed about the existence of alternative procedures, which increases the risk of actual restrictions on access to consular assistance and the timely processing of documents.

(c) Ensuring Access to Consular Actions for Persons with Limited Mobility

Among Ukrainian citizens who are forced to stay abroad are people with disabilities, those who are seriously ill, or those with other complex illnesses that prevent them from moving around independently and require care from others. At the same time, the requirement to update military registration details as a condition for consular actions, as provided for in Part 5 of Article 20 of the Law of Ukraine “On the Legal Regime of Martial Law”, for a long time contained no exceptions for persons who, due to their state of health, require care from others, which created risks of restricting access to urgent consular services.

In this regard, the Commissioner initiated the issue of expanding the list of exceptions in the legislation. The Ministry of Defence of Ukraine supported the proposal, whilst the MFA, seeing no systemic problem, expressed its readiness for inter-agency consideration in the event of a further initiative.

In 2025, following amendments to regulatory legislation, mechanisms were introduced for the remote fulfilment of military registration requirements for male Ukrainian citizens residing abroad, including automatic registration for military service and the option to create an electronic military registration document via the ‘Reserve+’ mobile app. The possession of such a document is a sufficient condition for the performance of consular actions and does not require personal attendance or passing a military medical commission.

These changes have significantly reduced procedural and physical barriers to accessing consular services for persons with disabilities, seriously ill persons and citizens who are unable to move due to their state of health. At the same time, the Commissioner emphasises that maintaining the effectiveness of this mechanism requires constant monitoring of its practical implementation, the stable functioning of electronic services, and the proper informing of Ukrainian citizens abroad.

(d) The Challenges Faced by Residents of Specialised Institutions Evacuated Abroad

In the course of parliamentary oversight, the Commissioner identified systemic difficulties in ensuring access to consular and notarial services for residents of specialised institutions who were evacuated abroad following the Russian Federation’s full-scale armed aggression against Ukraine. This concerns, in particular, persons with disabilities, orphans, children deprived of parental care, as well as adults who were in residential institutions within the social protection system.

Current legislation provides for exemptions from consular fees for notarial services abroad for certain vulnerable categories of persons. In particular, Law of Ukraine No. 4170-IX of 19 December 2024 amended Article 38 of the Law of Ukraine “On Notariate” by adding a provision under which no consular fee is charged for certifying the accuracy of the translation into Ukrainian of documents required for a person to undergo an assessment of their daily functioning. This amendment has partially addressed the issue of the financial accessibility of notarial actions for residents of specialised institutions who have been evacuated.

At the same time, the practice of applying the legislation shows that formal exemption from consular fees does not remove other significant barriers to accessing

services. Such barriers include the complexity of procedures, the need to gather a significant number of documents, etc.

In its response to the Commissioner's appeal, the MFA noted that the issue of simplifying access for vulnerable groups of citizens to consular and social benefit-related procedures requires a comprehensive inter-agency adjustment with the widespread use of digital tools. The MFA also points out that policy-making in the field of social protection falls within the remit of the MinCult, which should initiate the relevant legislative changes.

Despite some positive steps, as of the end of the reporting period, no comprehensive regulatory and institutional mechanism had been introduced that would take into account the specific needs of residents of specialised institutions who have been evacuated. The lack of a coordinated approach among executive authorities leads to situations where the most vulnerable individuals remain restricted in exercising their right to access documents and social guarantees, creating risks of legal and social isolation abroad.

10.4.5. Electoral Rights of Ukrainians Residing Abroad

The significant increase in the number of Ukrainians residing abroad requires the development of a new state strategy. A comprehensive approach must be implemented to take into account the interests of millions of citizens outside the country and to ensure they have a genuine opportunity to exercise their right to vote, by adapting electoral procedures to the new realities.

The Ukrainian Parliament Commissioner for Human Rights emphasises that, under current legislation, the electoral rights of Ukrainian citizens abroad are exercised exclusively through in-person (face-to-face) voting, which makes the physical accessibility of polling stations a decisive condition for the exercise of the right guaranteed by Article 38 of the Constitution of Ukraine.

The insufficient number of overseas polling stations and the incompatibility of their location with the actual number of citizens and the logistical conditions of the countries of residence significantly limit the possibility of in-person participation in voting, creating indirect discriminatory barriers based on place of residence, contrary to Articles 3 and 24 of the Constitution of Ukraine, and fail to ensure the genuine and effective exercise of electoral rights in accordance with Article 25 of the International Covenant on Civil and Political Rights.

In the event of elections, such a significant number of Ukrainian citizens residing abroad must enjoy equal rights in the exercise of their constitutional right to participate in elections. This issue requires a comprehensive and coordinated response from the Ukrainian state authorities, taking into account the scale of migration and the geographical distribution of citizens abroad.

Based on the results of the above analysis and in accordance with statistics from the MFA, a significant number of Ukrainian citizens abroad objectively require access to the exercise of their electoral rights, in particular through the expansion and optimisation of electoral infrastructure in their countries of residence.

10.4.6. Overseas Monitoring Visits

In 2025, the Commissioner's Secretariat carried out **9 international monitoring visits** to accommodation centres for Ukrainian citizens under temporary protection in European Union member states.

The purpose of the visits was to assess living conditions, access to social services, medical care, education and employment, as well as the observance of other rights of Ukrainian citizens.

Monitoring visits were carried out to:

- 2 accommodation centres in the Republic of Finland;
- 2 centres in the Italian Republic;
- 1 centre in the Republic of Austria;
- 4 centres in the Federal Republic of Germany.

During the visits, meetings were held with representatives of the administrations of the accommodation centres, local authorities, Ukrainian diplomatic missions, as well as directly with Ukrainian citizens under temporary protection.

Based on the results of the monitoring, an analytical document entitled 'Ukrainians abroad: access to public services in the context of temporary protection status and expected return' was prepared, along with recommendations aimed at improving the conditions of stay for Ukrainian citizens abroad, expanding their access to social guarantees, and strengthening cooperation with the authorities of the host countries.

These activities form part of the Commissioner's systematic work to protect the rights and freedoms of Ukrainian citizens, regardless of their place of residence. The Commissioner's Secretariat works systematically with Ukrainians abroad – monitoring compliance with their rights, providing advice, gathering feedback and preparing analytics.

Representatives of the Commissioner's Secretariat took part in facilitated dialogues with Ukrainian communities in Warsaw (Republic of Poland) and Rome (Italian Republic), organised as part of the implementation of the Memorandum of Understanding between the OPORA Civil Network and the Secretariat of the Ukrainian Parliament Commissioner for Human Rights.

The protection of the rights of evacuated children became a separate priority. In 2025, staff from the Commissioner's Secretariat, as part of an inter-agency monitoring group, carried out four monitoring visits abroad to assess the conditions of stay and ensure the rights and interests of temporarily displaced (evacuated) children. In particular, monitoring visits were carried out to the Republic of Lithuania, the Kingdom of Spain and the Federal Republic of Germany.

The results of the monitoring visits carried out in 2025 showed that the violations identified during the monitoring visits in the previous year had not been rectified and were systemic.

These include, in particular, inadequate provision of living conditions and education for children, limited access to medical, rehabilitation, psychological and social services, the separation of children from their family groups, restrictions on the powers of accompanying persons and legal representatives, as well as specific breaches of the requirements of national legislation and international standards.

Further details on the findings of the monitoring visits are set out in the relevant thematic section “Children’s Rights”.

10.5. Ensuring Human Rights in the Context of European Integration

(a) The Role of the Commissioner in Ensuring Respect for Human Rights on the Path to EU Membership

In the context of Ukraine’s European integration, the ensuring of human rights, the rule of law and democratic principles are key criteria for assessing the country’s progress towards membership of the European Union.

In this process, national human rights institutions perform an important function of independently monitoring and assessing the state of compliance with fundamental rights, the principles of the rule of law and democracy. The Ukrainian Parliament Commissioner for Human Rights, as a national human rights institution, should serve as one of the cornerstones of Ukraine’s accession process to the European Union, particularly within the following negotiation chapters:

- Social policy and employment (Chapter 19);
- Judiciary and fundamental rights (Chapter 23);
- Justice, Freedom and Security (Chapter 24);
- Functioning of democratic institutions.

An important component of the Commissioner’s activities is active engagement in all processes relating to Ukraine’s European integration, in particular through participation in the development and implementation of reform roadmaps, involvement in negotiation processes in the field of European integration, as well as the systematic submission of positions and expert opinions on draft normative and legal acts concerning Ukraine’s European integration commitments. Particular attention is paid to ensuring that human rights protection standards are taken into account in the content of legislative initiatives, strategic documents and sectoral programmes related to European integration.

The Commissioner’s participation in the shaping and accompanying of European integration policy includes providing expert support for the implementation of relevant roadmaps, engaging in negotiation formats, and preparing human rights recommendations during the process of implementing the European Union’s *acquis* and adapting national legislation to European standards.

In this context, the Ukrainian Parliament Commissioner for Human Rights, by ensuring independent monitoring, systematic communication with international partners and providing human rights-based proposals for reforming the regulatory framework, acts as a key institutional guarantor of human rights compliance and contributes to Ukraine’s consistent fulfilment of its obligations in the process of accession to the European Union.

Preserving the institutional independence and ensuring adequate resourcing of the national human rights institution is a necessary prerequisite for the effective protection of human rights, the strengthening of the rule of law and the sustainability of democratic processes.

(b) Respect for Human Rights in the Context of Aligning Legislation with EU Law

The protection of human rights and the alignment of national legislation with EU standards remain priority tasks for Ukraine on its path to EU membership. The Ukrainian Parliament Commissioner for Human Rights carries out systematic work to monitor and evaluate legislative initiatives and to prepare strategic documents in this area.

During the reporting period, the Commissioner's Secretariat processed **167 requests (letters)** from the Cabinet of Ministers of Ukraine, the Ministry of Justice of Ukraine and other central executive authorities regarding the **implementation of European integration policy and the alignment of Ukrainian legislation with European Union standards**.

The Commissioner's Secretariat actively participates in the consideration and development of draft normative and legal acts as part of the process of aligning Ukrainian legislation with European Union law.

As part of this work, legal opinions, observations and proposals are provided on draft normative and legal acts with a view to taking into account international human rights standards and ensuring the alignment of national legislation with European Union law.

The Commissioner attaches particular importance to the observance of human rights in the process of Ukraine's European integration and actively participates in legislative and expert work aimed at aligning national legislation with EU standards. In 2025, the Commissioner's Secretariat contributed to the Individual Annual Reports of Ukraine within 2025 EU Enlargement Package and participated in the preparation of Ukraine's negotiating position under Chapter 23 'Judiciary and Fundamental Rights'.

On 14 May 2025, the Cabinet of Ministers of Ukraine approved, by Order No. 475-r "On Certain Issues of Ensuring the Negotiation Process on Ukraine's Accession to the European Union under Cluster 1: 'Fundamentals of the EU Accession Process'", four strategic documents: a Roadmap on the Rule of Law; A Roadmap on Public Administration Reform; A Roadmap on the Functioning of Democratic Institutions; An Action Plan dedicated to the protection of the rights of people belonging to national minorities (communities) of Ukraine.

Following the approval of these documents, the Commissioner's Secretariat continues to implement the measures set out in the Roadmap on the Rule of Law and the functioning of democratic institutions, as well as the tasks outlined in the Action Plan dedicated to the protection of the rights of people belonging to national minorities (communities) of Ukraine. Representatives of the Commissioner's Secretariat also took part in consultations with the European Commission regarding the monitoring of the implementation of these measures and tasks.

The Commissioner's Secretariat was actively involved in the implementation of the Action Plan for the implementation of the European Commission's recommendations, presented in the Report on Ukraine's progress in the framework of the EU Enlargement Package 2024, approved by Order of the Cabinet of Ministers of Ukraine No. 300-r of 28 March 2025.

As part of civil society's monitoring and assessment of Ukraine's progress in the field of European integration, the Commissioner's Secretariat analysed the Shadow

Report on Chapters 23 ‘Justice and Fundamental Rights’ and 24 ‘Justice, Freedom and Security’ of the European Commission’s Report on Ukraine’s progress within the EU Enlargement Package for 2024, prepared by the Agency for Legislative Initiatives in cooperation with civil society organisations and with the support of the European Union’s ‘Pravo-Justice’ project. Following the analysis of the reports, the Commissioner’s Secretariat sent official letters with recommendations to the Cabinet of Ministers of Ukraine and the Verkhovna Rada of Ukraine, in particular regarding the adoption of the draft law “On the Ukrainian Parliament Commissioner for Human Rights” (reg. No. 13181) and ensuring adequate funding for the Commissioner’s activities.

An important step in strengthening the Commissioner’s institutional involvement as the NHRI in European integration processes was the inclusion of the Commissioner’s Representative (Deputy) for international cooperation and European integration in the working (negotiating) groups on preparing Ukraine’s negotiating positions during negotiations with the European Union on the conclusion of the Agreement on Ukraine’s accession to the European Union regarding social policy and employment (Chapter 19), the judiciary and fundamental rights (Chapter 23), justice, freedom and security (Chapter 24), on the functioning of democratic institutions, as well as to the Inter-agency working group on ensuring the negotiation process on Ukraine’s accession to the European Union and the adaptation of Ukrainian legislation to European Union law.

The Commissioner’s activities in 2025 contributed to the effective monitoring of human rights compliance, the preparation of legislative initiatives and strategic documents. This work not only brings Ukrainian legislation closer to European Union standards but also strengthens the practical protection of citizens’ rights and freedoms, confirming the institution’s role as a key guarantor of human rights in the process of Ukraine’s European integration.

(c) The Commissioner’s Participation in Interaction with EU Institutions and in the Ukraine–EU Association Mechanisms

The Ukrainian Parliament Commissioner for Human Rights actively engages with European Union institutions and the Ukraine–EU Association mechanisms, helping to align national human rights practices with European standards.

The Commissioner continues to ensure the systematic strengthening of international cooperation in the context of Ukraine’s accession to the EU, in particular through active dialogue with the EU Delegation to Ukraine regarding priorities on the path to Ukraine’s EU membership and the Commissioner’s role in supporting this process, developing a partnership with the EU Advisory Mission in Ukraine, with a focus on strengthening the capacity of the Commissioner’s regional offices, as well as participating in dialogues with representatives of the European Commission’s Directorate-General for Enlargement and Eastern Neighbourhood (DG ENEST) and members of the European Network of National Human Rights Institutions (ENNHRI).

In 2025, representatives of the Commissioner’s Secretariat actively participated in key dialogues and cooperation mechanisms between Ukraine and the European Union in the field of human rights and European integration. In particular, representatives of the Commissioner’s Secretariat took part in the 10th meeting of the Human Rights Dialogue between Ukraine and the EU, the 12th round of Ukraine–EU consultations on the legal

consequences of the temporary occupation of certain territories of Ukraine, including the Autonomous Republic of Crimea and the city of Sevastopol, and the 8th meeting of the Ukraine–EU Association Committee. On 7–8 March 2025, the Commissioner took part in the 16th meeting of the Ukraine–EU Parliamentary Association Committee.

Also in 2025, representatives of the Commissioner’s Secretariat took part in the first round of coordination meetings with representatives of the European Commission, dedicated to the implementation of the Roadmap on the Rule of Law and the tasks of the Action Plan dedicated to the protection of the rights of people belonging to national minorities (communities) of Ukraine, as well as in two bilateral meetings between Ukraine and the European Commission as part of the official screening of the compliance of Ukrainian legislation with EU law: Chapter 31 ‘Foreign, Security and Defence Policy’ (7 March 2025) and Chapter 19 ‘Social Policy and Employment’ (24–25 March 2025).

Such active participation of the Commissioner in cooperation with EU institutions and in the association mechanisms between Ukraine and the EU contributes to strengthening the protection of human rights and the implementation of European standards in Ukraine.

RECOMMENDATIONS:

To the Verkhovna Rada of Ukraine:

to expedite consideration of the draft law “On the Ukrainian Parliament Commissioner for Human Rights” (registration No. 13181);

to amend the Electoral Code of Ukraine to simplify the procedures for organising and opening overseas polling stations.

To the Central Election Commission:

to introduce more flexible mechanisms for setting up temporary polling stations in places of compact residence of Ukrainians;

to improve the provision of information to Ukrainian citizens abroad regarding electoral procedures.

To the Cabinet of Ministers of Ukraine:

to ensure adequate funding for the organisation of elections abroad;

to ensure effective inter-agency coordination between ministries and other central executive bodies regarding the organisation and conduct of elections and voting by Ukrainian citizens abroad;

to adopt regulatory acts necessary for the exercise of citizens’ electoral rights abroad;

to include the Secretariat of the Ukrainian Parliament Commissioner for Human Rights in international technical assistance programmes and projects aimed at supporting European integration processes and the implementation of European human rights

standards within the framework of the negotiation process on Ukraine's accession to the EU;

to ensure implementation of the recommendations of the Shadow Report on Chapters 23 'Justice and Fundamental Rights' and 24 'Justice, Freedom and Security' of the European Commission's Report on Ukraine's progress within the European Union Enlargement Package for 2024, prepared by the Agency for Legislative Initiatives, in terms of recommendations concerning the enhancement of the institutional independence of the Commissioner's activities;

to ensure the inclusion of the Commissioner and representatives of the Commissioner's Secretariat, as a national human rights institution, in the delegation of the Government of Ukraine to participate in the session of the UN Commission on the Status of Women (annually).

To the Ministry of Foreign Affairs of Ukraine:

to expand the capacity of embassies and consulates to support the electoral process;
to facilitate the opening of additional or temporary polling stations;

to develop and implement alternative methods of authorisation for the 'e-Consul' system for Ukrainian citizens who do not have ID cards, access to the 'Diia' mobile app or Ukrainian mobile banking;

to ensure that Ukrainian citizens abroad are provided with clear and comprehensive information regarding alternative procedures for accessing consular services in cases where electronic identification via the 'e-Consul' system is not possible, in particular through the official websites and communication channels of diplomatic missions abroad;

to ensure advocacy regarding the participation of national human rights institutions in the work of the UN Commission on the Status of Women independently of the government, in particular through the Permanent Mission of Ukraine to the UN;

to ensure, within the framework of the Working Group on the Human Dimension, the active implementation of advocacy measures regarding the return of three categories of the Ukrainian population, namely: prisoners of war; civilians unlawfully detained in the Russian Federation or in the temporarily occupied territories of Ukraine; and deported and forcible displaced Ukrainian children;

to ensure timely and regular provision of information and invitations to the Commissioner to attend scheduled meetings of the International Coalition for the Return of Ukrainian Children, including international side events, conferences and special events;

to ensure that the Commissioner is granted access to all materials, documents and decisions discussed at meetings of the International Coalition for the Return of Ukrainian Children, to respond in a timely manner and formulate proposals from the national human rights institution.

To the Ministry of Finance of Ukraine:

to provide for specific budget programmes or expenditure relating to the organisation of elections abroad.

To the Ministry of Justice of Ukraine:

to ensure opportunity for participation by the Ukrainian Parliament Commissioner for Human Rights, as an independent national human rights institution, in meetings of the Council of Europe's Committee of Ministers on human rights (DH) concerning the state of the country's compliance with judgments of the European Court of Human Rights, with a view to providing an independent assessment of the state of their implementation in the field of human rights.

To the Ministry of Social Policy, Family and Unity of Ukraine:

to develop and submit to the Cabinet of Ministers of Ukraine a draft order approving a nationwide strategy for the protection of the rights and freedoms of persons forced to displace from Ukraine abroad, as well as for creating the necessary conditions for their return to Ukraine, setting out clear roles for central executive bodies in the areas of consular services, social protection, education, healthcare and employment;

to ensure the continuation of initiatives to establish a network of national unity hubs abroad and the development of the Unity App.

11. HUMAN RIGHTS IN UKRAINE: REGIONAL DIMENSION

11.1. Autonomous Republic of Crimea and Sevastopol

For the period from 01 January 2025 to 31 December 2025, the Commissioner for the Autonomous Republic of Crimea and the city of Sevastopol received **83** written appeals and **123** reports of rights violations.

The number of	2022	2023	2024	2025
Citizens' appeals	238	68	95	83
Reports of rights violations	247	94	121	123

The Autonomous Republic of Crimea is the territory of Ukraine that was the first to be attacked and occupied, and whose residents were the first to face large-scale and systemic human rights violations. Since the occupation of the peninsula, the aggressor has been violating fundamental human rights, including the right to personal liberty and security, freedom of movement, the right to life and dignity, the right to freely practice religion, the right to a fair trial, freedom of expression, and freedom of assembly and association. In the absence of effective control and access to the territories, the issues of protecting the rights of their citizens, recording offences and crimes, bringing to justice and restoring the rights of citizens require the state authorities to find additional mechanisms to restore violated rights and prevent their recurrence.

Monitoring visits/on-site inspections

Since 2014, the territory of the Autonomous Republic of Crimea has been under temporary occupation by the Russian Federation. Since then, Ukrainian state authorities have been temporarily restricted in exercising their powers in Crimea. The Ombudsman is restricted from conducting on-site monitoring in the territory, so the main sources of information on violations of rights and freedoms are citizens' appeals, data from open sources, analytical reports and reports of human rights organisations.

The main issues that the Ombudsman's representative worked on:

- The case of the Crimean Tatar Volunteer Battalion named after Noman Chelebidzhikhan;
- politically motivated persecution on the territory of the temporarily occupied Crimea;
- failure to provide adequate medical care to persons in captivity on the TOT of the ARC of Crimea;
- violation of the right to freedom of religion;
- illegal transfer from the occupied territories into the territory of the Russian Federation;
- forced mobilisation;
- prosecution under the administrative article on "public actions aimed at discrediting the Russian army";
- education in the native language;
- non-payment of annual state aid to persons deprived of their personal liberty as a result of armed aggression and their family members.

Case of the Noman Chelebidzhikhan Crimean Tatar Volunteer Battalion

Persecution of the so-called members of the Noman Celebidzhikhan Crimean Tatar Volunteer Battalion. The official grounds for the prosecution of the defendants in Crimea under Part 2 of Article 208 of the Criminal Code of the Russian Federation (participation in an illegal armed formation acting for purposes contrary to the interests of the Russian Federation) is that they did not voluntarily report to the Russian law enforcement agencies and did not declare their participation in the 'Noman Chelebidzhikhan Crimean Tatar Volunteer Battalion'.

The evidence of the battalion's activities against the interests of the Russian Federation, announced by the investigation, is media reports that the purpose of the battalion was to de-occupy Crimea. On 1 June 2022, the Supreme Court of the Russian Federation recognised the Noman Chelebidzhikhan Crimean Tatar Volunteer Battalion as a "terrorist organisation" and banned it from the territory of the Russian Federation. At least 38 people, including Ukrainian citizens abducted by the Russian military in southern Ukraine after 24 February 2022, were imprisoned on charges of participating in the Chelebidzhikhan battalion.

During 2025, human rights defenders documented at least 3 cases in the so-called "Noman Chelebidzhikhan Crimean Tatar Volunteer Battalion" case, in which residents of Crimea or residents of the occupied parts of Kherson and Zaporizhzhia regions were detained.

Crimean Tatar Khalil Ametov, detained in August 2022 in the occupied part of the Kherson region, was sentenced to 5 years in a penal colony. Bekir Gugurik, a 62-year-old Crimean Tatar from Henichesk, was sentenced to 4 years in a penal colony. The man is being held in SIZO No. 1 in the village of Chongar, Kherson region. Bekir, like his younger brother Rustem Gugurik, was accused of involvement in the battalion. On 12 December 2025, the Novotroitsk Inter-District Court in Henichesk, Kherson region, sentenced 47-year-old Eldar Karamurzaev from the village of Novooleksiivka to 8 years in prison.

Politically motivated persecution on the territory of the temporarily occupied Crimea

According to the Representative Office of the President of Ukraine in the Autonomous Republic of Crimea, as of February 2026, **219** Ukrainian citizens are in prison due to politically motivated and/or religious criminal prosecution. Of these, 153 are representatives of the indigenous Crimean Tatar people.

A striking example of politically motivated persecution is the case of Oleksandr Sizikov, who was accused of terrorism and attempted coup d'état at a time when he is a completely blind person who cannot meet his own needs, so how can he be a threat to the state - this demonstrates the political motive for the persecution.

All the cases mentioned in this report, namely: 219 illegally imprisoned and convicted citizens, 53 illegal transfers, 8 court verdicts on religious persecution, 626 administrative cases for evading illegal mobilisation, 517 cases of discrediting the Russian army, 40 cases of torture of Ukrainian citizens in places of detention, have common human rights violations: the right to privacy, the right not to be deprived of liberty, the right to a fair trial, the right to an impartial investigation, the right to prohibition of inhuman treatment, the right to defence.

The motives for political persecution in the temporarily occupied territory are: pro-Ukrainian position; expressing or publishing a position on social media that differs from the official position of Russian state bodies; professing religious teachings that contradict those adopted at the state level; struggle for the right to practice one's religion in a manner prescribed by religious norms (cases of Jehovah's Witnesses, persecution of OCU believers, cases of the so-called Hizb ut-Tahrir).

In 2025, for the first time in the Autonomous Republic of Crimea and the city of Sevastopol, the occupation authorities opened a case against Crimean Muslim women. On 15 October 2025, the wife of political prisoner Remzi Nimetulayev, a mother of many children Esma Nimetulayeva, a kindergarten teacher Nasiba Saidova, Elviza Aliyeva and Fevzie Osmanova were persecuted. All of them were detained and taken to the FSB Office in Simferopol.

This is the first case of the persecution of a group of women, which may become systemic in the future: the persecution of female Ukrainian citizens in the temporarily occupied territories for their religious beliefs.

Failure to provide adequate medical care to persons in captivity

During all the years of occupation, illegally imprisoned citizens of Ukraine in places of detention in the temporarily occupied Crimea or in the territory of the Russian Federation have faced systematic violations of the human right to timely and adequate medical care. Detention in pre-trial detention centres or colonies where a person is unable

to receive the necessary medical care is applied, in particular, to persons who, for medical reasons, should not be in such conditions of detention and who need to undergo complex medical procedures in a hospital setting. Failure to provide medical care and/or to release the affected persons (prisoners) from detention on medical grounds leads to serious consequences.

Since the beginning of 2025, the Ombudsman has received appeals from relatives of political prisoners in serious condition due to their illnesses.

In March 2024, due to a sharp deterioration in his health, Tofik Abdulgazyev was hospitalised in the prison tuberculosis hospital No. 3 in Chelyabinsk. In the hospital, the man was diagnosed with pulmonary tuberculosis in the infiltration phase and a number of other serious illnesses: bilateral pneumonia, small left-sided hydrothorax, anaemia, connective tissue dysplasia syndrome with mitral valve damage, chronic heart failure and gastritis, as well as nephrolithiasis. During his detention, the man lost 40 kg and developed health problems that he did not have before his arrest.

Currently, the political prisoner's condition is assessed as critical.

In November 2025, it became known from Abdulgazyev's wife that her husband had been diagnosed with stage 4 cancer with metastases.

Based on the results of processing the information on the political prisoner's health, the Ombudsman repeatedly sent appeals to the Russian Ombudsman demanding the immediate release of the seriously ill Crimean Tatar Tofik Abdulgazyev. Due to the absence of feedback and any information on the measures taken, the Commissioner appealed to the Turkish partners from the Office of the Ombudsman of the Republic of Turkey to draw attention to the problem and ask the Turkish side to also address the Russian Federation with the issue of the release of seriously ill persons, including Tofik Abdulgazyev.

The list of political prisoners includes Oleksandr Sizikov, who lost his eyesight in 2009 due to an accident, but this did not prevent him from holding single pickets in support of Crimean political prisoners in the future. It is because of his position and support for illegally convicted Crimean Muslims that Sizikov became a 'terrorist' who allegedly poses a threat to the occupation authorities - a vivid example of lawlessness and inhuman treatment of the peninsula's residents, violation of fundamental human rights and freedoms in the TOT of Crimea.

Since July 2020, Sizikov has been under house arrest, and on 13 September 2024, the Russian Military Court of Appeal, during the final consideration of the defence's appeal against the verdict of the Southern District Military Court of the Russian Federation, upheld the verdict. The court ruled that the convict's health condition was not an obstacle to serving his sentence in prison. Despite the contradictions in the current legislation of the Russian Federation, on 14 January 2025, he was transferred to the territory of the Russian Federation to serve his sentence.

In May 2025, the Minusinsk City Court of the Krasnoyarsk Territory released Sizikov from prison due to complete loss of sight, after which he returned to Crimea. However, already on 21 October, the Krasnoyarsk Regional Court in Russia cancelled the decision to release Oleksandr Sizikov, a blind defendant in the 'Crimean Muslims case', and ordered him to be returned to prison.

Another participant in a similar case, Lenur Khalilov, who was diagnosed with cancer and was also released in August due to illness, was also persecuted, but in October 2025, the Arkhangelsk court ruled that Khalilov should be returned to prison.

Failure to provide prisoners with medical care of the appropriate quality and to the extent required is a violation of Article 3 of the Convention for the Protection of Human Rights and Fundamental Freedoms "Prohibition of Torture", as without receiving proper care, such a person is effectively subjected to torture or inhuman or degrading treatment or punishment. Given that, according to the testimonies of defence lawyers and relatives of the victims (prisoners), as well as their case files, such persons systematically face refusals to provide assistance and ignoring complaints about the failure to provide assistance, such improper (inhuman) treatment is the result of deliberate inaction by officials and employees of the occupation and/or state administrations of the Russian Federation.

Two cases of deaths of prisoners in custody were previously recorded as a result of obstruction of proper medical care: Konstantin Shiring and Jamil Gafarov.

Currently, at least 40 people out of 219 people illegally detained by the occupation administrations and held in places of detention have disabilities or serious health problems. Among them: Amet Suleymanov, who needs urgent surgery to replace his heart valve; Oleksandr Sizikov, who has a first-grade disability and is completely blind, he was sentenced to 17 years in prison; Irina Danilovich, sentenced to 7 years in prison, who has been suffering from constant headaches for more than a year due to progressive otitis media and may completely lose her hearing.

The Ukrainian Parliament Commissioner for Human Rights has repeatedly appealed to the Russian Ombudsman to provide seriously ill political prisoners with proper medical care, but this has not brought any results. The Ombudsman also regularly appeals to international colleagues from Turkey, Qatar, the UAE, and Saudi Arabia to assist in the release of seriously ill persons illegally imprisoned.

The detention of persons with such medical diagnoses is not legal even from the point of view of the occupying state, under whose legislation they should be released from serving their sentence due to illness in accordance with the Resolution of the Government of the Russian Federation of 06.02.2004 No. 54 "On medical examination of convicts submitted for release from serving their sentence due to illness".

Violation of the right to freedom of religion

The year 2025 is marked by continued persecution on religious grounds. Russia pursues a policy of destroying all forms of independent religious views, except those subordinated to state religious organisations.

Since the beginning of the temporary occupation of the Autonomous Republic of Crimea and the city of Sevastopol in 2014, the religious situation on the peninsula has undergone profound transformations. The occupation administration of the Russian Federation is systematically destroying the religious diversity of the region, which has been shaped for decades by the high level of religious freedom in Ukraine. By 2021, the

number of religious organisations had more than halved, from 2,220 to 907, and the number of denominations represented had fallen to 20. This decline is not an accident, but a consequence of the targeted policy of the Russian occupiers: the introduction of Russian laws, a complex system of re-registration, and the persecution of "disloyal" communities.

According to the Mission of the President of Ukraine in Crimea, by the beginning of 2025, the occupation administration had almost completely subjugated the religious life of the peninsula. Only the activities of structures that showed loyalty or did not pose a threat of influence to the so-called "Muftis" of the Russian Federation and the Russian Orthodox Church remained "legal". Unregistered communities, according to Russian law, have lost the right to hold services, own property, distribute literature or carry out missionary activities. In addition, even registered organisations are regularly subject to sanctions for the slightest formal violations, from inaccurate names to alleged "illegal missionary activities".

Throughout the 12 years of occupation of the peninsula, the administrative, judicial, psychological and forceful pressure of the Russian occupation administration on the Crimean Diocese of the OCU to stop its activities and force it out of the occupied Crimea has not stopped.

In addition to the OCU, almost all churches and religious organisations are subjected to harassment, with the exception of those that have chosen to serve the occupiers. Among them are the Crimean Metropolis of the Moscow Patriarchate, which until 2022 had three dioceses of the UOC-MP, the Religious Administration of Muslims of Crimea, and some Old Believers, Protestants, and Jews.

The cases are considered in violation of the right to a fair trial, with the main evidence being the testimony of anonymous witnesses (many of them FSB officers), pre-trial testimony of witnesses who later claim in court that they gave such testimony under pressure, and linguistic examinations of the conversations of accused Muslims. The evidence provided by the defence is usually not considered by judges.⁴⁴

On 5 February 2025, at 4 am, in the occupied Crimea, the occupation security forces conducted illegal searches in the homes of Crimean Tatars in the villages of Istochnoye, Novokrymskoye and Lobanovo in Dzhankoy district, as well as in the village of Yarkoye Pole in Feodosia district. As a result of these raids, five people were detained: Emir Kurtnezirov, Abibulla Smedlyayev, Rustem Mustafayev, Mirzaali Tajibayev and Bakhtiyar Ablayev.

All of the illegally detained are currently being held in a pre-trial detention centre in Simferopol. The detainees are suspected under Article 205.5 of the Criminal Code of the Russian Federation 'Organisation of a terrorist organisation and participation in the activities of such an organisation'. That is, the accusation is not based on direct actions that constitute a crime, but only on belonging to the activities of an organisation that is prohibited. Moreover, such affiliation is established through the testimony of "closed witnesses" whose credibility cannot be established or refuted. As a result of the case, the illegal court issued an arrest warrant for Emir Kurtnezirov, Rustem Mustafayev and Abibulla Smedlyayev.

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In 2025, Russian courts and Crimean "courts" made such decisions on religious grounds:

On 05 February, the Vlasikha Military Court of Appeal upheld the sentence of Ansar Osmanov, who was sentenced to 20 years in prison;

On 17 April, the Supreme Court of the Russian Federation considered the cassation appeal and upheld the sentence of the Southern District Military Court of the Russian Federation for 5 Crimean Tatars serving their sentences in Russian colonies. Akim Bekirov, Rustem Seithalilov and Seitveli Seitabdiev were sentenced to 14 years in prison, Asan Yanikov and Eskender Suleymanov - to 15 years;

On 29 April, the Southern District Military Court of Rostov announced the sentences of the defendants of the 'second Dzhankoy group' (under part 2 of Article 205.5 of the Criminal Code of the Russian Federation and part 1 of Article 30, Article 278 of the Criminal Code of the Russian Federation). Khalil Mambetov, a 69-year-old resident of Dzhankoy, a repairman of household appliances, Refat Seydametov, a 55-year-old entrepreneur from the Dzhankoy district, Osman Abdurazakov, a 41-year-old builder, Leman Zekeryayev, a 51-year-old builder, and Ekrem Krosh, a 39-year-old household appliances repairman, were sentenced to 14 years in a strict regime colony. Aider Asanov, a 31-year-old specialist in the repair of payment terminals, was sentenced to 11 years in a strict regime colony;

On 14 October, 57-year-old Crimean Tatar Lenur Khalilov, released from a Russian colony for health reasons after being diagnosed with liver cancer with metastases to the lymph nodes, was taken into custody again by the decision of the 'Railway District Court' of Simferopol.

On 15 October, four Crimean Tatar women were detained in Crimea. In Bakhchisarai, Esma Nimetulayeva, mother of five and wife of political prisoner Remzi Nimetulayev, was detained. In the village of Kholmovka, Nasiba Saidova, a student of the pedagogical college and a kindergarten teacher, was detained. Elviza Aliyeva was detained in Dolyne, and Fevziye Osmanova in Orlivka. By the decision of the 'Kyiv District Court' of Simferopol, they were taken into custody on charges of involvement in the activities of Hizb ut-Tahrir;

On 21 October, the Krasnoyarsk Regional Court cancelled the decision of the Minusinsk City Court to release a blind Muslim man, Alexander Sizikov, from the colony and returned him to the colony. In October, the "Bakhchisaray District Court" arrested Oleksandr for 10 days on charges of "disobedience to police", and after the end of the arrest, he was transferred to SIZO No. 1 in Simferopol for transfer to a Russian colony;

On 26 November, the Southern District Military Court in Rostov convicted the defendants of the 'First Dzhankoy Group'. Activist Enver Krosh (charges under Article 205.5, Part 1, Article 30, Article 278 of the Criminal Code of the Russian Federation) was sentenced to 19 years in prison, Edem Bekirov and Rinat Aliyev - to 15 years, journalist Vilen Temeryanov - to 14 years, Seityazi Abbozov - to 13 years in prison (charges under Article 205.5, Part 2, Article 30, Article 278 of the Criminal Code of the Russian Federation);

On 18 December, the Supreme Court of the Russian Federation considered the cassation appeal in the case of the 'second Bakhchisaray' group and upheld the following sentences: Seyran Saliyev - 16 years in prison, Marlen Asanov - 19 years in prison, Timur

Ibragimov - 17 years in prison, Server Zekiryayev - 3 years in prison, Memet Belyalov - 18 years in prison, Edem Smailov - 13 years in prison and Server Mustafayev - 14 years in prison.

In April 2017, the Supreme Court of the Russian Federation recognised the "Management Centre of Jehovah's Witnesses in Russia" as an extremist organisation.

On 17 October 2025, judge Maria Bedritskaya of the Russian-controlled Razdolnensky District Court sentenced Tamara Bratseva, a 70-year-old resident of the village of Razdolnoye, to death, finding her guilty of "organising the activities of an extremist organisation".

Persecution has already been recorded in 2026: in early February, Russian security forces in Simferopol conducted searches⁴⁵ of local residents Galina Privalova, 59, and Anna Moroz, 27. They are accused of extremism for belonging to a banned organisation. Russian security forces seized mobile phones, photographs, personal records, postcards, bank cards, data storage devices and an e-book from the Crimean women.

Illegal transfer from the occupied territories deep into the territory of the Russian Federation

Russia does not stop the criminal practice of illegally transferring Ukrainian citizens to its territory, grossly violating the Geneva Conventions and norms on the humane treatment of civilians in time of war.

In 2025, 53 cases of transfer of Ukrainian citizens from the temporarily occupied Crimea to remote places of detention were recorded. People are taken 10,000 kilometres away from their homes, thus breaking family ties. Many of the convicts have elderly parents who, after being transferred, have no real opportunity to visit their relatives because of the long and arduous journey.

In addition, it is a common practice in Russia to subject prisoners to physical and psychological pressure during the transfer, and prisoners have to endure cold, hunger and the lack of any medication to maintain their health on the way. These inadequate conditions of transfer and the fact of transfer affect the general condition of political prisoners, including the exacerbation of chronic diseases. A vivid example of pressure on political prisoners is the case of Galina Dovgopol, who froze her legs during the transfer due to improper transfer conditions and lack of access to seasonally appropriate clothing, which violates the standards for the treatment of prisoners.

This practice is part of a repressive policy.

The transfer of political prisoners from the occupied Crimea to the territory of the Russian Federation is a violation of international law, namely

- Art. 49 of the IV Geneva Convention, which prohibits the Occupying Power from forcibly transferring civilians from the occupied territory to the territory of the Occupying Power;
- Article 76 of the IV Geneva Convention provides that persons "accused of a crime shall be detained in the occupied country and, if convicted, shall serve their

⁴⁵ <https://ru.krymr.com/a/news-krym-simferopol-obyski-ekstremizme-yevropeyskaya-assotsiatsiya-svideteley-iyegovy-/33674274.html>

sentence there". The unlawful deportation or transfer of a civilian is a war crime under Article 8(2)(a)(vii) of the Rome Statute of the International Criminal Court.

In 2025, the Russian President signed a law denouncing the European Convention for the Prevention of Torture and Inhuman Treatment. In this way, the Russian authorities narrowed the possibilities of applying international mechanisms for the prevention of torture, which were no longer actually in force in the occupied territories. Formally, supervision over places of detention remains within the scope of the Russian Federal Penitentiary Service and Russian courts, which are fully controlled by the Russian authorities. Criminal cases against abducted civilians are heard by the 'courts' of Crimea, courts on the territory of the Russian Federation (including military courts of the Russian Federation) or 'courts' established after 24 February 2022 in the newly occupied territories.

An example of such a transfer was the case of political prisoners from the Dzhankoy district of Crimea - Abibulla Smedlyaev, Emir Kurtnezirov, Rustem Mustafayev, Mirzali Tajibayev and Bakhtiyar Ablaev - who were transferred from the Simferopol SIZO-2 to Rostov-on-Don. This was reported by Abibula Smedlyayev's wife, Leniza, when on 22 November, she and her relatives tried to transfer food, where they were refused to accept the food, justifying that all four would be transferred from the territory of the Autonomous Republic of Crimea to the territory of the Russian Federation on 24 November 2025.

Also, on 5 December 2025, the mother of political prisoner Oleksandr Sizikov, Olena Sizikova, reported that her son had been transferred from the territory of the Autonomous Republic of Crimea on 1 December 2025.

In general, the occupiers transferred prisoners during 2025: Alexander Sizikov (twice), Oleg Fedorov, Seyran Khayretdinov, Ruslan Mesutov, Erfan Osmanov, Irina Danilovich, Asan Akhtemov, Marlen Mustafayev, Servet Gaziev, Timur Yalkabov, Arsen Abkhairov (twice), Ansar Osmanov, Rustem Sheikhaliyev, Ruslan Suleymanov, Osman Arifmemetov, Yashar Muedinov, Enver Mamutov, Emil Dzhemadenov, Lenur Seydametov, Irina Gorobtsova (twice), Yashar Shikhametov, Lenur Khalilov, Riza Izetov, Memet Belyalov, Eskender Abdulganiev, Oksana Senezhuk, Khalil Mambetov, Ismet Ibragimov (twice), Leman Zekerayev, Olga Tsirik, Gennadiy Osmak, Sergey Likhomanov, Seyran Asanov, Abibulla Smedlyaev, Emir Kurtnezirov, Rustem Mustafayev, Mirzali Tajibayev, Bakhtiyar Ablaevaa, Sergey Yatskov, Alina Grek, Irina Levchenko.

Forced mobilisation

Russia continues to involve residents of the TOT of the Autonomous Republic of Crimea, including conscripts, in the war against Ukraine. This information has been repeatedly reported by prisoners of war.

By the end of 2025, the occupation administration was conducting the 22nd mobilisation campaign, with no official figures on the number of recruits made public. The electronic registration system and criminal prosecutions have turned forced conscription into a mechanism of intimidation and control. Young men avoid official

employment, move between districts, and try to conceal their place of residence. But the possibility of leaving the occupied territory is becoming increasingly difficult.

If the trend continues, Crimea may find itself under constant mobilisation pressure starting in 2026⁴⁶. This means an annual increase in the number of cases of evasion, the expansion of digital control, and continued violations of international humanitarian law.

In order to force people to serve in the Russian Armed Forces, the occupation authorities use criminal prosecution for evasion under Article 328 of the Criminal Code of the Russian Federation (Evasion of service in the Armed Forces of the Russian Federation).

Since 2015, 626 criminal proceedings have been registered in the occupied Crimea under Article 328 of the Russian Criminal Code - "evasion of military or alternative civilian service". Half of them were initiated after 24 February 2022. During this period, the occupation 'courts' handed down 511 verdicts, of which 87 per cent were fines, and the rest were suspended sentences or forced labour. Most of the verdicts only mention "failure to appear when summoned" or "ignoring calls", which is not a criminal offence under international law. The ethnic aspect is particularly revealing: over 30% of the convicts are Crimean Tatars. This indicates the selectivity and political motivation of the persecution.

According to the data of the Coordination Headquarters for the Treatment of Prisoners of War, which were presented during the Third International Conference "Crimea Global. Understanding Ukraine through the South", Russia forcibly mobilised 46,327 Ukrainians in the temporarily occupied territories from February 2022 to July 2025, including **40,640 in Crimea**. 16% of prisoners held in Ukrainian POW camps are citizens of Ukraine, of whom 6% are Crimeans.

Human rights activists also note that as a result, 95 local residents in the occupied Crimea, illegally recruited into the ranks of the Russian army during the "partial mobilisation", were officially recognised as killed during the full-scale invasion of Ukraine.

Prosecution under the administrative article on "public actions aimed at discrediting the Russian army"

The occupation authorities continued the practice of prosecuting under the administrative article on "public actions aimed at discrediting the Russian army" (Article 20.3.3 of the Administrative Code of the Russian Federation, applied from 4 March 2022).

In 2025, according to the Crimean Human Rights Group, at least 517 administrative proceedings were documented, submitted to the "courts" of Crimea under Article 20.3.3 of the Administrative Code of the Russian Federation ("discrediting the Russian army"), and 464 of them were subject to administrative punishment (fines or administrative arrest) by the occupation "courts". In total, during the period of the full-scale invasion, the Crimean Human Rights Group has documented at least 1,510 such administrative proceedings

⁴⁶ <https://ppu.gov.ua/press-center/tendentsii-nezakonnnoho-pryzovu-v-okupovanomu-krymu-zhovten-2025-roku/>

The administrative article "discrediting the Russian army" is used to systematically restrict freedom of expression in Crimea. There has been a practice of persecution for anti-war statements, posting images of the Ukrainian flag on social media, attempts to call Crimea an occupied territory of Ukraine, any negative statements about representatives of the Russian authorities and the Russian armed forces, statements in support of Ukraine, expressing opinions condemning war crimes committed in the combat zone on the territory of Ukraine, and attempts to call a "special military operation" a war.

In 2025, local residents were most often persecuted for public posts on Facebook and the Telegram messenger. In addition, among the resolutions adopted in 2025 are decisions to impose a fine for liking, posting, reposting and commenting on news on Instagram, Odnoklassniki and VKontakte.

Most often, decisions under this article are made by Russian-controlled "courts" in Armyansk and Dzhankoy. The texts of the decisions state that the grounds for opening proceedings are usually checks by FSB officers of the phones of people crossing the administrative border between Crimea and the occupied part of Kherson region.

Under the guise of persecution for "discrediting the Russian army", the occupation authorities persecute residents of the occupied territories for manifestations of their national identity: images of the national emblem of Ukraine, publication of the national anthem of Ukraine, the flag of Ukraine, posts "I am a Ukrainian and I am proud of it", "We are from Ukraine" and calls to love Ukraine.

The analysed texts of the decisions include decisions on fines for the distribution of songs in the Ukrainian language, for example, Verka Serdyuchka's song "Ukraine has not yet died".

In addition, under Article 20.3.3 of the Administrative Code of the Russian Federation, Crimeans are tried for anti-war posts on social media, such as "No to war", "We do not want war" and other calls for peace, which are also regarded by "judges" as "discrediting the armed forces of the Russian Federation".

In 2025, the practice of opening criminal and administrative cases against Crimeans continued, based on the publications of pro-Russian blogger Oleksandr Talipov, founder and coordinator of the online community called Crimean SMERSH. Members of the community persecute those who do not support the Russian authorities and the war against Ukraine, publish personal information about such people, incite hatred against them, call for their persecution, and file denunciations with the FSB and the Ministry of Internal Affairs of the Russian Federation.

In March, the Russian-controlled Armyansk City Court considered the case of Svetlana Bondarenko. According to court materials, she posted a video on Facebook with footage of the destruction and bombing of Ukraine by the Russian army. The court explained Svetlana Bondarenko's guilt by the fact that the video she posted was "viewed by an indefinite number of people who left comments under the post".

The indictment reads: "The video footage shows the explosion of a building, civilian infrastructure of Ukraine, and also depicts the fire and smoke of a civilian facility with the image of the Ukrainian coat of arms above the entrance, which was freely available. Thus, public actions were taken to discredit the use of the Russian Armed

Forces to protect the interests of Russia and its citizens, and to maintain international peace and security.

Education in the mother tongue

According to open sources, there is not a single Ukrainian-language school left in the temporarily occupied Autonomous Republic of Crimea, most Ukrainian-language classes have been eliminated, and Crimean Tatar schools are being systematically closed.

Despite the fact that the Crimean Tatar language is currently the official language in Crimea, its use is limited. The occupation authorities are constantly changing the status of schools or trying to close various national schools on various pretexts to prevent children from learning their mother tongue.

Due to the inaccessibility to the temporarily occupied territory, it is impossible to influence the trend of reducing and destroying access to learning a native language other than Russian, so in order to protect the exercise of the rights of indigenous peoples, the Cabinet of Ministers of Ukraine approved the Strategy for the Development of the Crimean Tatar Language for 2022-2032 by Order No. 224-r of 23 February 2022.

The approved document provides for the establishment of the National Commission on the Crimean Tatar Language as an advisory body to the Cabinet of Ministers of Ukraine to ensure interagency coordination, coordination of actions of central and local executive authorities on issues related to the implementation of the Strategy.

A representative of the Commissioner for the Rights of the Residents of the Autonomous Republic of Crimea and the city of Sevastopol joined the Commission.

At the beginning of 2014, **7.3 per cent** of the total number of students in Crimea were taught in Ukrainian, or **13,589** children, and today **249** students are taught in Ukrainian, or 0.015 per cent of the total number of students.⁴⁷

The same negative dynamics is observed in the teaching of the Crimean Tatar language. Although there is no exact data on the number of students, it is known for certain that at the beginning of 2014 there were 15 Crimean Tatar schools and 384 Crimean Tatar classes in the Autonomous Republic of Crimea. Currently, there are only 7 schools and 119 classes with the Crimean Tatar language of instruction. Also, education in the mother tongue is limited to the 9th grade only, with older students deprived of the right to study in their mother tongue. Teaching in the Crimean Tatar language is allowed only up to the 9th grade and upon parental request. Administrations of educational institutions create obstacles to such applications under various pretexts: "there is only one native language in Crimea - Russian", "lack of classrooms", "lack of teaching staff", "lack of textbooks" - all these statements are used as grounds for refusing to provide education in the Crimean Tatar language for parents who wish their children to receive education in their native language. There have also been cases of blatant refusal: parents are forced to refuse to study in the Crimean Tatar language, or the number of hours for studying the Crimean Tatar language and literature is reduced.

⁴⁷ <https://ua.krymr.com/a/news-krym-ukrayins%CA%B9ka-mova-navchannya/33175162.html>

Crimean residents are currently deprived of the opportunity to learn and communicate openly in their native language. Thus, despite the formal status of "republican language" preserved for Ukrainian and Crimean Tatar, teaching in these languages in schools was completely stopped, and language classes were cancelled or transferred to the status of optional subjects. It is worth noting that before the occupation of Crimea, the vast majority of schools had Russian as the language of instruction, but there were some schools or classes where instruction was in Ukrainian or Crimean Tatar - at the request of parents.

Non-payment of annual state aid to persons deprived of their personal liberty as a result of armed aggression and their family members

Between 2023 and the end of 2025, the Ombudsman received **170** appeals from the families of Crimean political prisoners residing in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol, asking for assistance in obtaining annual state financial assistance for persons in respect of whom the deprivation of personal liberty as a result of armed aggression against Ukraine has been established, which they have not received since 2023.

The applicants report that they are unable to receive financial assistance for persons in respect of whom the deprivation of personal liberty as a result of armed aggression against Ukraine has been established, while they are in the temporarily occupied territory of the Autonomous Republic of Crimea and the city of Sevastopol due to the lack of verified bank data, up-to-date bank accounts and the inability to receive the said assistance through an authorised person.

In order to protect the rights and freedoms of persons violated as a result of the temporary occupation of part of the territory of Ukraine and taking into account numerous appeals from Ukrainian citizens living there, reports of NGOs and human rights organisations, the Ombudsman's Secretariat appealed to the Ministry of Communities and Territories Development of Ukraine with an initiative to consider the essence of the problem and jointly develop a mechanism for resolving the issue by amending the Regulation on the Commission, which establishes the fact of deprivation of personal liberty as a result of armed aggression, and the Procedure for paying annual

The Ombudsman's Office has prepared a draft act of amendments to the existing legal acts, in particular, CMU Resolution No. 1281 of 15.11.2022, to eliminate shortcomings and to submit a proposal from the Ukrainian Parliament Commissioner for Human Rights, which would resolve the issue of receiving annual state aid for persons in respect of whom the deprivation of personal liberty as a result of armed aggression against Ukraine and their family members has been established.

RECOMMENDATIONS:

To the Ministry of Development of Territories and Communities of Ukraine:

Amend CMU Resolution 1281 of 15 November 2022 to ensure that citizens from the temporarily occupied territories can receive annual state aid on the account of trustees;

To the Ministry of Foreign Affairs:

to appeal to international partners to intensify pressure on the Russian Federation to release civilians illegally deprived of their personal liberty as a result of armed aggression against Ukraine.

11.2. Vinnytsia Region

Between 01 January 2025 and 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **5,716** appeals from Vinnytsia region, containing **6,649** reports of human and civil rights violations.

Among the most frequently mentioned human rights violations in the reports were: civil rights - **4,972** reports, social rights - **352** reports, economic rights - **268** reports, personal rights - **156** reports; children's rights - **126** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	1 656	4 140	4 928	5 716
Reports of rights violations	1 929	4 589	5 356	6 649

Vinnytsia region is strategically important due to its border with the Republic of Moldova (over 200 km), which opens up opportunities for cross-border cooperation. The region has become a reliable rear, hosting a significant number of internally displaced persons. This requires constant attention to social protection, human rights, housing, employment and medical care.

Monitoring visits/on-site inspections

In 2025, the team of the Mission conducted **115** monitoring visits in key areas of human rights observance and protection.

An important area of work at the regional level in Vinnytsia region is the protection of the rights of persons affected by the armed aggression against Ukraine. In 2025, the team of the Mission carried out **32** monitoring visits to protect the rights of persons affected by the armed aggression against Ukraine.

The educational centres "Crimea-Ukraine" and "Donbas-Ukraine" operate in the region on the basis of higher and vocational higher education institutions, which provide assistance to applicants from the temporarily occupied territories, in particular by providing individual consultations on the specifics of the admission campaign, paperwork, and support in choosing an educational institution: higher or vocational higher education. In 2025, monitoring visits were made to **5** such centres and it was noted that all **37** recommendations made in the last reporting period had been fully implemented. Applicants from the temporarily occupied territories were provided with assistance, in particular, through individual consultations on the specifics of the admission campaign, paperwork, and support in choosing an educational institution: higher education, vocational pre-higher education.

In order to ensure the constitutional right of citizens to safety and access to protective structures under martial law, **35** monitoring visits were carried out to check the condition of shelters and the possibility of their use by the population. The monitoring visits were conducted both in Vinnytsia city and in the settlements of Vinnytsia region, covering protective structures of various forms of ownership and subordination.

In particular, shelters managed by local governments, municipal institutions, educational and healthcare facilities, and state-owned enterprises that are required by law to ensure the availability of protective structures to the public were inspected. Particular attention was paid to the actual possibility of using the shelters in case of air raid, their technical condition, availability of navigation, lighting, ventilation and conditions for different categories of people.

In 2025, **19** monitoring visits were conducted in the area of child protection. The inspections were aimed at observing the property and housing rights of children in difficult life circumstances, as well as ensuring the right to family upbringing. Particular attention was paid to the observance of children's rights to a safe educational environment in the activities of educational institutions in Vinnytsia region.

Within the framework of exercising the powers envisaged by Article 13 of the Law of Ukraine "On the Ukrainian Parliament Commissioner for Human Rights", the Office conducted **18** monitoring observations of court hearings.

In particular, court hearings were attended in Vinnytsia City Court, Vinnytsia District Administrative Court and the Seventh Administrative Court of Appeal. The monitoring covered various categories of cases, including land disputes, adoption issues, administrative proceedings and other areas of public interest. Some of the issues included convicts' appeals for conditional release, commutation of an unspent part of their sentence to a milder one, and observance of their procedural rights.

Certain hearings, including closed ones, were attended within the framework of the right to be present at court hearings provided for by law in order to assess the state of procedural rights of participants and compliance with the principles of fair trial.

Another important area of the Representative Office's activity is the implementation of the functions of the national preventive mechanism aimed at preventing cruel, inhuman or degrading treatment of persons in places of detention. In this area, **6** monitoring visits were carried out to places where people are held in conditions of actual restriction of freedom.

The visits assessed the living conditions and treatment of the inmates, access to medical care, compliance with security standards, privacy, the possibility of exercising basic rights, and the absence of risks of violence or other forms of ill-treatment.

In addition, **five** inspections of compliance with personal data protection legislation were carried out. Based on the results of the inspections, acts were drawn up and orders were issued to eliminate the identified violations, including violations of the procedure for processing personal data, organising their protection and ensuring access of personal data subjects to information about themselves and third parties.

Educational activities

In 2025, the Commissioner's Office in Vinnytsia region organised and participated in **76** events to ensure interaction with the public, authorities and local self-government bodies. Also during the year, the office held **3** human rights forums with the participation of **323** people.

The events were comprehensive and covered a wide range of topical human rights issues. They became platforms for open dialogue, exchange of experience and development of practical solutions aimed at strengthening the protection of constitutional human rights and freedoms, raising the level of legal culture of the population and strengthening cooperation between state authorities, local self-government bodies, NGOs and international organisations in Vinnytsia region.

The main issues addressed by the Ombudsperson's Office were

- protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the right to life and security;
- protection of children's rights;
- protection of information rights.

1. Protecting the rights of servicemen, veterans, persons liable for military service, and families of servicemen who went missing under special circumstances

Since 21 April 2025, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War has been operating in Vinnytsia. The

purpose of the Regional Working Group is to coordinate and ensure the interaction of state authorities, law enforcement agencies, military formations, local governments, NGOs and other structures to support and provide legal and psychological assistance to the families of prisoners of war or missing persons in special circumstances.

The main tasks of the working group are to promote the implementation of state policy in the field of protection of the rights of prisoners of war and their families, organise information exchange, review citizens' appeals, ensure that families are properly informed about the mechanisms for searching for and determining the fate of servicemen, and develop proposals for prompt resolution of problematic issues within its competence.

The regional working group includes a representative of the Office of the Commissioner for Persons Missing in Special Circumstances, representatives of the National Police of Ukraine, the National Guard of Ukraine, the Security Service of Ukraine, the State Border Guard Service of Ukraine, the State Special Transport Service, as well as a representative of the Ukrainian Parliament Commissioner for Human Rights.

The involvement of representatives of these bodies and institutions ensures prompt exchange of information, coordination of actions within the powers of each entity, proper response to citizens' appeals, and facilitates effective decision-making on the search, identification and determination of the fate of prisoners of war and persons missing in special circumstances. Such an interagency format of work allows to strengthen the protection of the rights of affected persons and their families, as well as to ensure the implementation of state policy in this area at the regional level. During the reporting period, **15** such meetings were held, attended **by 1,105 people**.

Among the key challenges in 2025 is an increase in the number of calls for mobilisation compared to last year (by 76 calls). In particular, systemic violations by territorial recruitment and social support centres remain in the area of conscription, which creates risks of non-compliance with the constitutional rights and freedoms of citizens.

Among the most common problems addressed by **117** people were: failure to grant or delay in granting deferment from conscription, denial of access to lawyers, unreasonable putting citizens on the wanted list, and violation of the procedural procedure for bringing citizens to administrative responsibility under Articles 210-210¹ of the Code of Ukraine on Administrative Offences.

Such systemic violations indicate the need to strengthen control over the activities of TCCs and JVs, to ensure timely access to legal aid for citizens and to comply with the law during the implementation of mobilisation procedures.

The Regional Office of the Ombudsman in Vinnytsia region received numerous appeals from the Northern Interregional Centre for Free Legal Aid to prevent lawyers from providing legal aid to citizens. Such actions led to a violation of the constitutional right to defence and to professional legal aid.

According to the appeals, lawyers appointed by the authorised persons of the Northern Centre to provide secondary legal aid to detainees arrived at the premises designated for confidential meetings with clients, but were not allowed to enter. The refusal was justified by the fact that these premises are restricted facilities that require a special permit.

As a result, the detainees could not exercise their right to professional legal assistance guaranteed by the Constitution of Ukraine.

In the framework of the proceedings, the Mission sent a letter to the Vinnytsia United City TCC and JV with a request to provide comprehensive information on the situation, clarify whether lawyers were allowed to have confidential meetings with detainees and inform about the availability and functioning of a special meeting room.

The Vinnytsia JCCC and JV reported that due to the lack of video recordings and detailed explanations of the participants of the event, it was impossible to establish the circumstances of the refusal, as the event took place more than a month ago.

In order to respond appropriately, the office requested the Ministry of Defence of Ukraine to conduct an internal investigation into the denial of access to lawyers to the detainees. The Ministry of Defence organised an internal investigation, which revealed a violation of the Internal Service Statute of the Armed Forces of Ukraine.

Following the investigation, the relevant official was brought to disciplinary responsibility.

In addition, the Ministry of Defence provided a room for confidential meetings of persons liable for military service with lawyers in the Vinnytsia United City TCC and JV.

Thus, due to the interaction of the Mission and the Ministry of Defence, the constitutional right to professional legal aid was restored, and the responsibility for the violation was brought under proper state control.

A citizen A. applied to the Mission regarding the alleged violation of the Law of Ukraine "On Citizens' Appeals" by the second department of the Tulchyn RTC and JV.

The essence of the issue was that citizen A. had sent to the said department an application for cancellation of the resolution under Article 210(3) of the Code of Administrative Offences, which brought citizen B. to administrative liability with a fine of UAH 17 thousand. It is important to emphasise that at the time the decision was issued, citizen B. had the status of missing in action under special circumstances while performing combat missions as part of the Armed Forces of Ukraine.

After tracking the postal item, it was found that the letter was returned to citizen A. because the addressee refused to receive it. This indicated a lack of proper organisation of work with citizens' appeals.

Within the framework of the proceedings, the Mission sent a letter to the Second Department of the Tulchyn RTC and JV with a request to ensure registration of the applicant's appeal in accordance with the Constitution of Ukraine and the Law of Ukraine "On Citizens' Appeals".

The Tulchyn RTC and JV reported that it was a separate unit of the Vinnytsia RTC and JV, so the complaint of citizen A. was sent to the regional centre for consideration under Article 288 of the Code of Administrative Offences.

Subsequently, the Vinnytsia JCCC and JV informed about the decision: the decision regarding citizen B. was cancelled, and an internal investigation was conducted against the responsible officials on the fact of official negligence.

As a result, the constitutional right of citizen A. to proper consideration of the appeal was restored without the need for a court appeal, which demonstrates the effectiveness of the office's response and interaction with the authorities.

Another important issue is ensuring the rights of servicemen and veterans to social guarantees and benefits, as well as proper documentation of their status in state registers.

In **46** appeals, the most common problems were

- Delays or refusals to issue combatant certificates and other documents confirming the status of a military personnel;
- untimely or incomplete reflection of information in the Diia application, which made it impossible to receive benefits and compensation provided for by law;
- unregulated procedures for returning to the Armed Forces of Ukraine after unauthorised leaving the unit, including the lack of clear instructions on the legal assessment of such actions and restoration of legal status;
- Difficulties in accessing information on the calculation of social benefits and pension guarantees, as well as insufficient coordination between military units and social security authorities;
- Problems with the right to medical examination, rehabilitation programmes and psychological support for veterans, especially those who directly participated in hostilities;
- the lack of an effective mechanism of communication between veterans, military units and local self-government bodies, which complicates the prompt resolution of issues related to status, benefits and social guarantees.

The Representative Office has established systematic work with veterans and the veteran community in the region. In the framework of cooperation, the Mission develops

recommendations that are discussed at joint meetings with state and local authorities, namely

- improving the procedures for processing documents of veterans and military personnel;
- accelerating the processing of information in state registers and information systems;
- Improving coordination between military units, social protection institutions, medical facilities and government agencies;
- creating an effective feedback system for timely response to veterans' appeals.

2. Protection of the rights of victims of armed aggression against Ukraine

According to the Vinnytsia Regional Military Administration, **142,000** internally displaced persons live in the region and receive support and provision. Since the beginning of the full-scale war, **368,000** people have moved through the region in transit.

The issues related to ensuring proper conditions in the temporary accommodation places for internally displaced persons remain problematic, including insufficient provision of 16 temporary accommodation places with basic necessities (household items, hygiene products, necessary equipment and basic living conditions). A separate problem is the cases of eviction or relocation of IDPs to other places of temporary residence without following the established procedures, proper information and provision of alternative accommodation options.

As part of the response to citizens' appeals, the office conducted **33** on-site inspections of IDPs' temporary accommodation in Vinnytsia and Vinnytsia region. During these visits, the office assessed the living conditions, access to basic services, medical care, nutrition and social support, as well as the observance of the right to proper information.

Based on the results of the visits, the Vinnytsia LCA received **42** recommendations on the living conditions of internally displaced persons, in accordance with the requirements of the Cabinet of Ministers of Ukraine Resolution No. 930 of 01.09.2023, namely: to take measures to carry out repair work in bathrooms and showers while respecting the right to privacy; to replace windows damaged by explosions; to provide furniture, household appliances, washing machines and dryers.

Of the **42** recommendations made, **39** have been implemented and **3** are in the process of being implemented.

According to the Vinnytsia Regional Military Administration, in the city of Mohyliv-Podilskyi, IDPs were accommodated on the premises of the Mohyliv-Podilskyi City Utility Company "Zhytlovokommunhosp". However, these facilities were not included in the official list of places of temporary residence of IDPs in Vinnytsia region, and therefore the residents did not receive humanitarian assistance from NGOs and charitable foundations.

In order to study the situation objectively, the regional office, together with the NGO "IDP Ukraine" and the charity fund "Right to Protection", conducted a monitoring visit to the places of temporary residence. At the time of the visit, these TACs did not have official names and previously functioned as communal non-profit enterprises. These premises were home to 80 internally displaced persons, including 39 families. During the visit, the regional office, together with the NGO "IDP Ukraine", provided humanitarian aid to the residents, free legal aid, and received more than 25 appeals to the Ombudsman.

In addition, a working meeting was held with the mayor of Mohyliv-Podilskyi, which resulted in the relocation of some IDPs living in the ICC premises to official ICCs in Vinnytsia region. Another facility is planned to be included in the list of temporary accommodation for IDPs in 2026.

3. Protection of the right to life and security

Ensuring the right to security of citizens is an absolute priority in the activities of the Mission in the region, especially given the constant threat of shelling by the Russian Federation. Therefore, special attention was paid to the objects of the defence facilities fund.

In 2025, the Mission's staff carried out **35** monitoring visits to the facilities of the protective structures fund to assess the possibility of their use as shelters for the population, including **32** scheduled and **3** unscheduled visits. Of these, **30 were** simple shelters and **5 were** radiation shelters. In total, **192** recommendations were provided as a result of the monitoring visits, of which **164** were implemented, **25** were in the process of implementation, **and 3** were not implemented.

During the monitoring visits to the objects of the protective structures fund, special attention is paid to compliance with the Requirements for Maintenance, Arrangement and Operation of the Objects of the Civil Protection Fund, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 9 July 2018, namely their signage, accessibility, electricity supply, ventilation system, temperature and humidity, availability of technical and drinking water, first aid equipment, rescue tools, etc.

The following systemic problems were identified during the monitoring visits to the facilities of the Shelter Fund in 2025

- Inaccessibility of the facilities of the protective structures fund for people with disabilities and other low-mobility groups;
- failure to provide the simplest shelters with technical and drinking water;
- failure to provide the simplest shelters with first aid kits with a basic set of medicines and bandages;
- failure to provide the facilities of the fund of protective structures with fire extinguishing equipment and shanty tools;
- failure to ensure proper temperature and humidity conditions through regular ventilation of the premises.

During the monitoring visit to the educational institution in Bar, it was found that the simplest shelter did not meet accessibility standards. The entrance to the premises was possible only through the sewing room, which did not provide free access to the shelter and effectively deprived citizens of the right to protection during air raid alerts. In addition, a gym was located in the building. The shelter was also not provided with regular ventilation.

As a result of the letter sent by the Ombudsman's Office, the balance holder repaired one of the premises and provided ventilation.

During the monitoring visit to the educational institution in Brailiv village, the staff of the Representative Office found that the simplest shelter did not meet the standards of inclusiveness. The entrance to the premises did not provide free access for persons with disabilities and other low-mobility groups, which effectively deprived them of the right to protection during the air raid.

Following the Commissioner's letter sent by the Secretariat, the balance holder equipped the entrance with a ramp, which eliminated the violation of the legislation on barrier-free access and ensured equal access to the security space for all categories of citizens.

The facts revealed indicate that the measures taken by local authorities are insufficient to properly account for and prepare protective structures for use. Given the systematic nature of the violations, the issue of public safety and the functioning of shelters remains a priority and is constantly monitored by the Ombudsman and his representative in the region.

4. Protection of children's rights

In 2025, **19** visits were carried out to monitor the observance of the rights of orphans, children deprived of parental care, and children in difficult life circumstances.

The Representative Office regularly visited educational and medical institutions, including special institutions where children are placed. During the monitoring visits, attention was paid to compliance with sanitary and fire safety standards, compliance of the actual number of children with the licensed capacity of the institution, ensuring accessibility for persons with disabilities, proper medical examinations and treatment with the written consent of parents, as well as keeping records of cases of violence and other risks to children, taking into account the conditions of martial law.

During visits to educational institutions, the most typical violations are inadequate arrangement of premises in accordance with the requirements of DBN B.2.2-40:2018 "State Building Standards, Inclusiveness of Buildings and Structures, Basic Provisions".

The canteen menus often lack information on the content of food allergens in ready-to-eat meals, as well as the decoding of food allergen indices, which makes it difficult to ensure the safety of children with allergies. Inadequate and untimely maintenance of catering documents is a widespread problem, contrary to the Procedure for organising catering in educational institutions and children's health and recreation facilities, approved by a Resolution of the Cabinet of Ministers of Ukraine.

There are no provisions in the job descriptions of administrative and economic staff and specialists to prevent cruel, inhuman or degrading treatment or punishment of children.

The results of the monitoring visit to the general secondary education institution of Zhmerynka City Council revealed violations of students' rights to a safe educational environment.

In particular, the nurse of the institution independently, without the appropriate prescription from a paediatrician, dispensed medicines to children. In addition, expired medicines were found in the medical centre.

Concerns were raised about the state of catering, where the monitoring group noted the absence of a daily menu, which was prepared by the staff only at the request of the monitoring group. However, the menu does not contain information about the available food allergens, and there is no decoding of food allergen indices in accordance with nutritional standards. The monitoring group found the presence of unlabelled products and compliance with product proximity.

Based on the recommendations provided, the administration of the institution strengthened control over the activities of the nurse, expired medicines were removed and disposed of.

The management of the facility took control over the publication of the daily and long-term menu, which includes information on food allergens and their

decoding in accordance with nutritional standards. A log of daily compliance with nutritional standards has been kept and compliance with the requirements of food product proximity has been taken under control.

The timely response to the identified violations allowed us to restore the right of students to safe conditions in the educational institution and minimise risks to their health.

In addition, the cooperation of educational institutions with the relevant children's services and the procedure for the implementation, review and execution of individual child social protection plans are violated. A common violation is the failure of a parent or other legal representative of a pupil to sign or approve individual development programmes.

During the monitoring visit to the Dashiv Special School, some violations were recorded as a result of the development of individual social protection plans for children in difficult life circumstances, children without parental care, orphans, and children deprived of parental care. In particular:

information on the needs of children, measures to meet them, responsible executors, deadlines and information on the status of their implementation is not fully specified;

there is no information on the review and adjustment of measures in selected personal files;

there are no results of the implementation of measures or information on the occurrence of circumstances that make it impossible to implement them;

some individual plans do not include representatives of the institution as subjects of the individual plan implementation;

some individual plans lack signatures of both the parties to the individual plan and the child's legal representatives.

This indicates a lack of proper cooperation and interaction between the educational institution and services for children and families, social service centres and institutions that provide social services.

Based on the results of the report, the administration of the institution took measures to establish cooperation with the relevant children's services, review and properly draw up individual plans for the social protection of children.

The legality of placement of pupils in boarding schools at educational institutions is not always ensured, including confirmation of transport links and the duration of the one-way journey.

The monitoring visits to educational institutions that include a boarding school established to ensure territorial accessibility to secondary education for children with special educational needs revealed the lack of relevant documents confirming the legitimacy of the placement of students in the boarding school.

To implement this recommendation, the educational institutions prepared relevant letters to local authorities to confirm that the duration of the one-way journey to school (both by public and special transport) exceeds one hour or there is no direct connection.

The status of implementation of the recommendations and measures taken to restore the violated rights of children is monitored by the staff of the Ombudsperson's Office in Vinnytsia region.

Out of **278** recommendations: **251** have been implemented; **27** are in the process of implementation.

5. Protection of information rights

In order to assess the transparency of activities and compliance with legislation in the field of access to public information, observance of the right to appeal and protection of personal data by state authorities and local self-government bodies, the Commissioner's Office in Vinnytsia region conducted **5** on-site inspections in 2025 on the observance of human rights and of citizens to appeal and information. Based on the results of the inspections, **27** recommendations were provided, which were fully implemented.

In the process of exercising parliamentary control over the observance of constitutional human and civil rights and freedoms in Vinnytsia region, one of the problematic issues is the violation of the right to appeal and access to public information.

Under martial law, local authorities do not ensure an adequate level of information transparency. In particular, there is no up-to-date contact information on managers, departments and responsible persons, which makes it much more difficult for citizens to access the necessary information and communicate promptly. "In most cases, hotlines do not function or work improperly, which leads to violations of citizens' rights to timely information and assistance, especially in urgent or crisis situations.

There were also **97** violations of access to public information: unjustified refusals to provide information, incomplete or formal responses, and failure to comply with legal requirements for mandatory disclosure of information of public interest. The absence of statutory request forms on the official websites of local self-government bodies makes it difficult for citizens to exercise their right to information.

Such violations create a systemic problem of restricting citizens' rights to access information and to make requests, which negatively affects the transparency of government activities, reduces the level of public trust and limits the ability to effectively monitor the observance of constitutional rights and freedoms. Eliminating these

violations is urgent and requires a comprehensive approach, including ensuring that information on websites is up-to-date, that hotlines function properly, that citizens' requests are responded to in a timely manner, and that public awareness is raised among officials.

As a result of the identified violations, **two** reports on administrative offences were drawn up: one under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences (failure to comply with the legal requirements of the Ukrainian Parliament Commissioner for Human Rights) and one under Article 212⁽³⁾ of the Code of Administrative Offences (violation of the right to information and the right to appeal). The court upheld all the reports and imposed appropriate fines, which confirms the legitimacy of the Commissioner's actions and the obligation of local authorities to comply with the law.

The NGO "Vedara" appealed to the Ukrainian Parliament Commissioner for Human Rights in connection with the failure of the village council to provide public information on the request for a copy of the charter of the territorial community and information on the amount of the village head's salary.

In order to ensure the right to access public information, the Ombudsman's Secretariat sent a letter to the village council explaining the legislation on access to public information and requesting a full and comprehensive response to the NGO's request.

In response, the village council refused to provide the requested information, citing the fact that such information is not covered by the Law of Ukraine "On Access to Public Information" (hereinafter - Law No. 2939).

In this regard, the Ombudsman's Secretariat sent a letter to the village council again with additional explanations of the provisions of Law No. 2939 and provided a form for written explanations of the actions of the council officials.

However, the village council did not respond to the letter, which indicates that an administrative offence was committed under Article 188⁽⁴⁰⁾ of the Code of Ukraine on Administrative Offences (hereinafter - the Code), namely, failure to comply with the legal requirements of the representative of the Ukrainian Parliament Commissioner for Human Rights.

Following the response of the Ombudsman's Office, a report on administrative offence was drawn up against the village head under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences and sent to the Mohyliv-Podilskyi City District Court of Vinnytsia region.

After reviewing the report, the court issued a resolution finding the village head guilty of committing an administrative offence under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences and imposing an administrative penalty in the form of a fine

of UAH 1,700.

Thus, with the assistance of the Ukrainian Parliament Commissioner for Human Rights, the violation of the legislation on access to public information was responded to and the guilty official was brought to justice.

RECOMMENDATIONS:

To the Vinnytsia Regional Military Administration:

Bring the places of temporary residence of IDPs in line with the requirements approved by the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Cabinet of Ministers of Ukraine on 1 September 2023, No. 930;

to facilitate the attraction of additional resources, including government programmes, humanitarian aid and international technical support for repair and restoration work in places of temporary residence of internally displaced persons;

ensure that educational institutions comply with safety standards, sanitary and hygienic requirements, and requirements for medical care and nutrition.

Local self-government bodies:

Ensure barrier-free and accessible premises in local community institutions for people with disabilities and low-mobility groups by approving and implementing relevant action plans and identifying responsible persons;

ensure the publication on official websites of the information provided for by the Law of Ukraine "On Access to Public Information" and the exercise of the right to submit an oral appeal, in particular by calling the contact number published on the official website;

to ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans;

to intensify work on the creation of family-based forms of education in each territorial community as a priority model for the protection of children's rights;

to ensure that temporary accommodation for IDPs is brought in line with established standards and that a fund of housing for temporary accommodation is formed, including proper consideration of needs;

to implement internal procedures for organising work with personal data and control over their protection, to identify a responsible person who organises work related to the protection of personal data during their processing;

to establish a mechanism for prompt exchange of information and strengthen cooperation with the relevant children's services for timely review and proper execution of individual social protection plans for children.

Vinnitsia Regional Territorial Centre for Recruitment and Social Support:

to strengthen communication and systematic informing of families of prisoners of war and persons missing under special circumstances on issues within the competence of the TCC and the JRB to ensure proper exercise of powers and increase public trust.

11.3. Volyn Region

Between 01 January 2025 and 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **3,378** appeals from Volyn region, containing **3,874** reports of human and civil rights violations.

Among the most frequently mentioned human rights violations in the reports were: civil rights - **2,919** reports, social rights - **166** reports, economic rights - **166** reports, personal rights - **88** reports, and children's rights - **80** reports.

The number	2022	2023	2024	2025
Citizens' appeals	581	578	826	378
Reports of rights violations	795	868	1087	874

The peculiarity of the Volyn region is the presence of the only humanitarian crossing point in Ukraine (Domanove-Mokhrany checkpoint), through which Ukrainian

citizens return from the temporarily occupied territories to the territory controlled by Ukraine. The region also continues to receive people evacuated from settlements located in the areas of military (combat) operations. For these categories of people, it is important to ensure coordination between government agencies, NGOs and businesses, as well as to set up a transit centre to create a systematic and coordinated approach to providing assistance.

In 2025, a Child Protection Centre was opened at the Ombudsperson's Office, which clearly defines this area as one of the top priorities in Volyn Oblast.

Monitoring visits/on-site inspections

In 2025, the team of the Ombudsperson's Office in Volyn region conducted **160** monitoring visits.

In particular, **18** monitoring visits were carried out in the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention, including **2** unscheduled visits to institutions and establishments to verify the facts stated in citizens' appeals and during media monitoring.

In the area of child protection, **40** monitoring visits were conducted in 2025. Among them, there were **5** unscheduled visits to institutions and institutions to verify the facts set out in citizens' appeals and during media monitoring.

In order to determine the level of equal rights and freedoms, in particular, accessibility of social infrastructure facilities in Volyn region, the team of the Office conducted **4** monitoring visits to healthcare facilities in Lutsk to analyse accessibility for people with reduced mobility.

An important area of work in Volyn region is the protection of the rights of persons affected by the armed aggression against Ukraine. In 2025, the team of the Representative Office conducted **21** monitoring visits in the field of protection of the rights of persons affected by the armed aggression against Ukraine and **2** visits on access to education.

In the field of information rights protection, the team of the Mission carried out **28** on-site inspections, including: **24** on-site inspections on the observance of human and civil rights to appeals and information and **4** inspections of compliance with the legislation on personal data protection.

At the request of citizens, the team of the Representative Office conducted **3** monitoring observations of court hearings to ensure compliance with the procedural rights of participants in the trial.

In 2025, special attention was paid to the area of civil protection of the population. The team of the Mission conducted **44** monitoring visits to civil protection facilities to assess the state of preparedness, accessibility and observance of human rights in emergency situations.

Educational activities

The team of the Mission conducted **21** awareness-raising events for internally displaced persons (IDPs) in the places of temporary residence (TACs); **63** awareness-

raising events for the population of Volyn region; **9** awareness-raising events in places of detention.

In addition, the team of the Mission took part in **15** meetings with families of prisoners of war and missing persons organised in different settlements of Volyn region by the Coordination Headquarters for the Treatment of Prisoners of War together with the Commissioner for Persons Missing in Special Circumstances, the State Research Forensic Centre of the Ministry of Internal Affairs of Ukraine, representatives of law enforcement agencies, military formations, the Pension Fund and the Veterans' Policy and Social Protection.

During the meetings, consultations were provided on the procedure for submitting appeals to the Ombudsman, in particular to confirm the status of captivity of missing servicemen, as well as on social and pension issues. At the same time, a reception was held, during which family members submitted written appeals to the Ombudsman. The events were attended by **876** people from the families of prisoners of war and missing servicemen. A **total** of **272** appeals were registered and taken for processing in accordance with the Ombudsman's powers. The work carried out helped to provide counselling support for the families of prisoners of war and missing persons, and ensured a systematic response to their requests and needs, including: improper receipt of payments, delays in the appointment or recalculation of financial support, difficulties in obtaining the necessary documents, obtaining clarifications on the procedures for establishing the status of a person missing in special circumstances, as well as other social and legal issues.

The main issues addressed by the Ombudsperson's Office were:

- Protection of children's rights;
- protection of the rights of victims of armed aggression;
- protection of the rights of persons held in places of detention;
- protection of the rights of persons with disabilities and other low-mobility groups;
- protection of information rights.

1. Protection of children's rights

In 2025, the Children's Rights Protection Centre was launched at the Office of the Ukrainian Parliament Commissioner for Human Rights in Volyn region. Its activities are aimed at ensuring proper protection of the rights and best interests of children in the process of interaction with law enforcement agencies. During the year, the Centre conducted **3** such surveys, which involve a child-friendly approach, creating a safe and comfortable environment, reducing psychological stress and strict observance of procedural guarantees.

As part of monitoring the observance of the rights of orphans, children deprived of parental care and children in difficult life circumstances, the team of the Ombudsperson's Office conducted **40** monitoring visits.

As part of the parliamentary oversight of the observance of children's rights in 2025, monitoring visits were regularly conducted, including to 6 institutional childcare facilities. These inspections most often revealed violations related to living conditions (in

6 institutions), ensuring children's privacy and dignity (in 4 institutions), catering (in 2 institutions), access to information (in 2 institutions), health care (in 5 institutions) and creating a safe educational environment (in 6 institutions).

In September 2025, a monitoring visit was conducted to the Zaturtsiv Special School "Education Centre" of the Volyn Regional Council, where 130 children study.

During the visit, numerous violations of the rights of pupils were identified. In particular, shower rooms and bathrooms were isolated only by side partitions without doors, which did not ensure children's privacy. The entrance to the protective structure was not adapted for persons with disabilities. The facility did not have information materials about assistance services and hotlines, did not have an approved regulation on violence prevention, and did not keep a safety log, which made it impossible to systematically inform children about protection mechanisms.

In addition, there were violations in the area of food management: the reject log was not filled out completely, refrigeration equipment was used in violation of the rules of product proximity and labelling, dairy and meat products were stored outside the refrigerator, the menu did not indicate the content of allergens, and food samples were taken improperly.

Violations were also found in the provision of psychological support: after the dismissal of a practical psychologist, consultations were conducted by a social educator, which did not comply with the staffing table and legal requirements. The violations identified indicated the need to bring the institution into compliance with the requirements of the law and international standards in the field of child protection.

Based on the results of the monitoring, 14 recommendations were made, the implementation of which was under constant control. The administration of the institution has taken a number of measures to eliminate shortcomings and create more comfortable and safe conditions for children, 10 recommendations have been implemented, and 4 more are in the process of implementation.

In particular, accounting and control documentation was brought into line, and systematic control over sanitary and hygienic standards, food storage conditions and food allergen labelling was introduced. A system was introduced to inform children about the possibility of seeking help, including anonymously, taking into account the age and individual needs of each child.

In addition, based on the recommendations provided by the institution, design and estimate documentation was developed, and the Volyn Regional Council allocated funding for the arrangement of bathrooms with separate cubicles. The staff of the institution includes psychologists and doctors, which ensures proper psychological support for children and control over the organisation of meals.

As a result, 130 children receive better conditions for learning, development and safe stay, which helps to gradually bring their lives closer to the standards of

national legislation and international standards for the protection of children's rights.

Monitoring the conditions of children's stay in healthcare facilities is an important tool for ensuring their rights. In 2025, 3 monitoring visits were made to such institutions to check the conditions of children's stay, the level of medical care and the organisation of their meals.

During the monitoring visit to the Municipal Enterprise "Centre for Medical Rehabilitation and Palliative Care for Children" of the Volyn Regional Council, the Mission's team identified violations related to children's safety, sanitary and hygienic conditions, medical and dietary nutrition, storage of medicines, control of access to the institution and living conditions of children.

In particular, it was found that medicines were stored chaotically, expired medicines were available, and refrigeration equipment was not functioning properly, posing health risks to children. In addition, the facility lacked a medical isolation unit for children with signs of infectious diseases. The sign "SHELTER" with the necessary information was not placed at the entrance to the shelter, and the lift for people with disabilities was not functioning.

The monitoring also revealed violations in the organisation of food and sanitary and hygienic conditions, in particular, the refrigeration equipment in the food unit did not have proper labelling and designations for its purpose, and daily samples of ready meals were stored outside the refrigerator. It was also found that the logs of rejected finished products were kept with a future date and that the temperature regime for storing daily samples was not followed, which threatened the safety of children's nutrition.

In addition, it was found that most of the children did not have personalised underwear and their own storage space, which violated their right to decent treatment.

In response to the recommendations made in the monitoring, the administration of the institution took a number of measures aimed at creating a safe environment for each child. A working group was set up and an internal inspection was conducted to ensure compliance with security rules and control of access to the facility. Clear rules for patients and visitors have been approved, so that outsiders have access only in certain cases, under the supervision of staff.

A separate room for temporary isolation prior to hospitalisation was set up, refrigeration equipment was updated, and the storage of medicines was streamlined, including the removal of expired medicines. Each child received personalised underwear and their own storage space.

Control over catering and documentation was strengthened; the responsible person who committed the violations was dismissed. Updated job descriptions for staff were approved to reflect child protection standards, and all staff received

Safeguarding training to ensure they understand and apply the principles of safe childcare.

Shelters on the premises are also properly marked. In addition, disciplinary actions were taken against the perpetrators for violations of labour discipline.

Considerable attention was also paid to the observance of students' rights to a safe and healthy educational environment. In 2025, the Mission's team conducted 27 monitoring visits to educational institutions.

The monitoring visit to the general secondary education institution of the Lutsk City Council revealed violations of students' rights to a safe educational environment and provided 15 recommendations, of which 9 were implemented. In particular, members of the monitoring group found evidence of the storage of medical supplies that are not provided for in the exemplary list of medical devices, medicines and other materials that should be part of the medical kit for the provision of medical care at the medical unit of general secondary education institutions, approved by the order of the Ministry of Health of Ukraine dated 06.04.2021 No. 637. The fact that these medicines were issued to students is confirmed by the relevant records of the nurse in the outpatient care log.

Of particular concern was the state of catering, namely, the disregard by the catering staff for regular food sampling and labelling.

There were also violations of the standards of accessibility of the shelter for persons with disabilities and other low-mobility groups: there was no ramp and no information signs in Braille.

The analysis of the content of the official electronic resource revealed the absence of a significant part of the information that is required for mandatory publication and free access to citizens in accordance with Article 30 of the Law of Ukraine "On Education". The institution's website also revealed violations in the area of personal data protection and access to public information, namely the publication of the names of students in orders of the institution's administration in the public domain without depersonalising them.

As a result of the recommendations, the administration of the institution withdrew the inappropriate medical supplies. Control over the organisation of pupils' meals was also increased: control over regular food sampling and labelling was strengthened. The institution has taken measures to ensure unimpeded access to the shelter for people with disabilities and other people with limited mobility. In particular, safe and accessible routes to the shelter have been identified, proper lighting and no obstacles on the way to evacuation have been provided. For people with musculoskeletal disorders, a portable ramp is provided to overcome stairs. The shelter and its approaches are equipped with information boards with clear visual markings, including duplication in Braille. The official web resource was filled with all the necessary information, and orders were brought into line by removing data that could identify students.

Based on the results of the monitoring, recommendations were made to eliminate the shortcomings, the implementation of which was constantly monitored. The systematic work in this area was aimed at gradually bringing the conditions for children's stay in line with the requirements of national legislation and international standards for the protection of children's rights. Out of **150** recommendations: **51** were implemented; **82** were in the process of implementation; **17** were not implemented.

2. Protection of the rights of victims of armed aggression

The humanitarian crossing point (checkpoint) "Domanove - Mokrany" continues to operate in Volyn region, allowing Ukrainian citizens to return from the temporarily occupied territories. According to the information provided by the headquarters of the 6th Border Guard Detachment of Volyn, **12,584** people returned to Ukraine in 2025, of whom **11,350** were citizens returned from the temporarily occupied territories.

Persons crossing the state border at the Domanove-Mokrany checkpoint are in a vulnerable state after a long stay under occupation, lacking documents, means of communication, financial resources or the ability to organise further movement through the territory of Ukraine on their own.

A separate problem is the limited access of persons returning from the temporarily occupied territories to primary medical, psychological and legal assistance immediately after crossing the border.

Therefore, it is necessary to set up a transit centre in the Volyn region in close proximity to the Domanove-Mokrany checkpoint to ensure a systematic approach to the reception of Ukrainian citizens returning from the temporarily occupied territories.

This transit centre will provide safe and decent conditions for the temporary stay of persons, provide them with primary medical, psychological and legal assistance, assist in restoring documents, applying for social benefits and organising further transportation. In addition, the centre will help to establish effective interagency coordination between state authorities, local governments, social services and humanitarian organisations.

The creation of the transit centre will help reduce humanitarian risks, prevent human rights violations and ensure that the basic needs of people returning from the temporarily occupied territories are met in accordance with international standards and the state's obligations.

According to the Unified IDP Information Database, as of 31 December 2025, **43,251** IDPs were registered in Volyn region, including: **31,505** families, **17,339** men, **25,912** women, **10,735** children under 18, **2,344** persons with disabilities, **6,979** pensioners, **93** large families, **19** single parents.

As part of the parliamentary control over the observance of the rights of victims of armed aggression in 2025, the team of the Mission conducted **21** monitoring visits in the field of protection of the rights of persons affected by the armed aggression against Ukraine and held **21** educational events for IDPs in their places of temporary residence. During such inspections, violations related to inadequate living conditions, insufficient furniture and household appliances were most often identified. Thus, out of 20 ICCs operating in Volyn region as of December 2025, 19 need to improve their living conditions, namely, repairing premises, purchasing furniture and household appliances.

Based on the results of the visits, the regional military administration was provided with recommendations on how to comply with the living conditions of internally displaced persons in accordance with the requirements of the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023, in particular, to take measures to carry out repair work in the premises of temporary accommodation places for IDPs, provide furniture, household appliances, washing machines and dryers.

Of the **35** recommendations provided, **12** were implemented; **21** were in the process of implementation; and **2** were not implemented.

A monitoring visit to the place of temporary residence of internally displaced persons in the village of Bashlaki, Tsumanska territorial community, Lutsk district, revealed a number of violations.

In particular, the emergency condition of the roof and heating system; lack of a boiler, washing machine, refrigerator and electric stove; the need to replace electrical wiring; the need for bed linen; IDPs living in rooms without gender division.

To ensure proper living conditions, the Ombudsman sent a letter to the Volyn Regional Military Administration with recommendations to eliminate the identified violations.

Pursuant to the recommendations, the internally displaced persons were resettled with due regard to gender and age. A washing machine was repaired and bed linen sets were purchased at the expense of the local budget. A washing machine, two fridges and an electric stove were provided at the temporary accommodation facility at the expense of the Rokada Charitable Foundation, and a boiler was purchased. A contract has been signed to replace the roof of the building, and the chimneys are to be cleaned. Firewood was purchased at the expense of the Tsumansk territorial community budget to provide heating in winter.

3. Protection of the rights of persons held in places of detention

In 2025, the team of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Volyn region conducted **18** monitoring visits as part of the functions of the national preventive mechanism and parliamentary control over the observance of human rights in places of detention. Of these, **2** were unscheduled visits to institutions and establishments to verify the facts set out in citizens' appeals and revealed during media monitoring.

In order to prevent torture and other cruel, inhuman or degrading treatment or punishment, special attention was paid to persons in need of constant outside supervision and support in social protection institutions, including inpatient care units.

In 2025, monitoring visits were carried out to 8 such institutions in Volyn region. These visits revealed violations related to the observance of the wards' rights to life and safety (in 6 institutions), health care and medical care (in 6 institutions), respect for

private and family life (in 3 institutions) and the creation of appropriate conditions of detention (in 6 institutions).

Based on the results of the visits, the relevant reports were drawn up and recommendations were made to ensure respect for human rights and improve the conditions of detainees in these institutions.

Of the **87** recommendations provided, **30** were implemented; **22** were in the process of being implemented; and **35** were not implemented.

As part of the implementation of the functions of the national preventive mechanism, numerous violations of the rights of the wards were identified during a monitoring visit to the Residential Care Unit for Permanent Residence of the Territorial Centre for Social Services (Provision of Social Services) of the Volodymyr City Council.

In particular, it was found that medical supplies were stored in a chaotic manner, expired drugs were available, and refrigeration equipment was not functioning properly, which created health risks for the wards. The absence of a medical isolation room for people with signs of infectious diseases and the lack of alarms in the sanitary facilities also endangered the safety of the wards.

Call buttons for staff were not functioning in the living rooms, and overcrowding and tight arrangement of beds reduced personal space and comfort. In addition, shortcomings were identified in the organisation of meals, including improper labelling of refrigeration equipment and storage of daily food samples outside the refrigerator.

Based on the results of the monitoring, the Ombudsman provided recommendations, the implementation of which was under constant control. In response to the recommendations, the administration of the institution took a set of measures to eliminate the shortcomings and create more comfortable and safe conditions for the wards.

In the area of medical care, the administration has established constant control over the shelf life of medicines and ensured proper record keeping.

Measures have been taken to improve safety and accessibility. Panic buttons have been installed in rooms and sanitary facilities, control over compliance with natural daily nutritional standards and proper labelling of products has been ensured, and the maintenance and entry of information into the Injury Log is constantly monitored. Screens were purchased to ensure privacy in the bedrooms.

Design and estimate documentation has been developed for the reconstruction of the Residential Care Unit for permanent residence of the Territorial Centre for Social Services (Provision of Social Services) of the Volodymyr City Council, which includes the construction of a shelter, a new two-storey building with an increase in the number of beds and the creation of living rooms for 1-2 people with individual bathrooms.

4. Protecting the rights of people with disabilities and other people with limited mobility

In 2025, the team of the Representative Office in Volyn Oblast conducted **4** monitoring visits to healthcare facilities in Lutsk to analyse accessibility for people with reduced mobility.

The monitors revealed numerous non-compliances with building regulations, including the lack of signs with the name of the institution duplicated in Braille, tactile signs in the premises, the lack of ramps and inadequate arrangement of workplaces equipped to serve people with hearing and visual impairments, people with limited mobility, and elevators without sound signals. Based on the results of the monitoring, 21 recommendations were made. Of the **21** recommendations, **11** were implemented; **7** were in progress; **and 3** were not implemented.

The monitoring visit to the Lutsk Primary Health Care Centre revealed a number of violations of architectural accessibility for persons with disabilities and other low-mobility groups.

In particular, the sign with the name of the institution was not duplicated in Braille, and the sign with the opening hours was absent. The slope of the existing ramp at the entrance did not meet the requirements for safe use, and the ramp was damaged. Inside the building, there were no tactile signs in contrasting colours indicating the names of doctors' offices in tactile and/or Braille. The surface of the reception desk is too high for convenient service for people with reduced mobility. There is no workplace for people with hearing and visual impairments.

In response to the recommendations, the administration of the Lutsk Primary Healthcare Centre has taken a number of practical steps to remove accessibility barriers for persons with disabilities and other low-mobility groups.

In particular, clear and accessible navigation was provided: an information sign with the name of the institution and working hours was installed, duplicated in Braille, as well as tactile contrasting signs with the names of offices. The reception desk was adapted to the needs of people in wheelchairs by lowering the height of the counter to the appropriate level.

For people with visual impairments, the lift is equipped with sound systems, and call buttons and sound metronomes are installed in outpatient clinics. Communication accessibility for people with hearing impairments was ensured by signing a contract for Ukrainian sign language interpretation services.

In addition, design and estimate documentation for the overhaul of the ramp has been prepared and the premises for the shelter have been prepared, which creates the preconditions for further comprehensive removal of architectural barriers.

5. Protection of information rights

In 2025, the team of the Representative Office in Volyn Oblast conducted **24** on-site inspections of human and civil rights to appeals and information on official websites of territorial communities to analyse the state of compliance with legislation on access to public information.

The monitors revealed systemic shortcomings in the content of 23 websites, including: improper publication or lack of information on decisions and regulatory documents; use of outdated contact details for citizens to apply to structural units; lack of published reports on the consideration of requests for information; failure to publish the procedure for personal reception of citizens by officials, etc.

Employees of the Commissioner's office conducted an on-site inspection of the website of the Shatsk territorial community, during which they found a number of violations of the legislation on access to public information.

In particular, it was found that the requirements of Article 15 of the Law of Ukraine "On Access to Public Information" were not fully met, including in terms of publishing information on the community's activities and financial resources, including the structure and amount of budget funds, the procedure and mechanism for their use. In addition, the website lacked information on the list and conditions for receiving public services, forms and samples of documents and rules for filling them out, the procedure for submitting and appealing requests for information, general rules of the institution, internal labour regulations, and reports on the consideration of requests for information. These violations made it difficult for citizens to exercise their right to access public information.

As a result of the Commissioner's response, the identified shortcomings were eliminated and the level of openness and accessibility of information for the community residents was increased.

In particular, to implement the recommendations, the village council updated key information sections of the website. The Budget section contains the budget of the Shatsk settlement territorial community for 2025.

To increase transparency of the procedures for handling citizens' appeals, the 'For residents' section published the regulatory framework governing the submission of appeals, defined their types, posted samples of applications, proposals and complaints, and published a report on the status of appeals handling.

The Procedure for Providing Access to Public Information, approved by Order No. 14-r dated 14.01.2021, is posted in the relevant section for free review. The website also contains the internal labour regulations.

During the monitoring in 2025, the Representative Office also identified violations of the requirements for ensuring openness and accessibility of information. In particular, state and local authorities often fail to publish information on the principles of formation and amount of remuneration, remuneration and additional benefits of the head, as well as the lack of registration on the Unified State Open Data Web Portal and the Unified Web Portal for the Use of Public Funds.

Remote monitoring of the official website of the Department of Youth and Sports of the Volyn Regional Military Administration showed incomplete compliance with the requirements of the legislation on access to public information and consideration of citizens' appeals. It revealed the absence of mandatory information, including reports on the work with citizens' appeals, information on the organisational structure, functions and powers of the Department, principles of remuneration of the management, contact details of officials, and the procedure for holding competitions to fill vacant positions. The Office was also not registered as an information manager on the Unified State Open Data Web Portal and did not publish information on the Unified Web Portal for the Use of Public Funds.

In pursuance of the recommendations made, the Office's website contains the following: organisational structure, functions, powers and main tasks; Regulation on the Office; information on the principles of formation and amount of remuneration, remuneration and additional benefits of the head; contact details of the management and structural units; procedure for holding competitions to fill vacant positions; reports on work with citizens' appeals and requests for public information.

In addition, other mandatory information was updated and published in accordance with Article 15 of the Law of Ukraine "On Access to Public Information", in particular, on: the regulatory framework for the Department's activities; the procedure for making and submitting requests for information; the activities of collegial bodies; work schedules and reception of citizens; contact data of subordinate institutions and structural units in the field of youth policy, physical culture and sports.

The Department was also registered on the Unified State Web Portal of Open Data and the Unified Web Portal of Public Funds Use, which ensured additional transparency in the use of public resources.

Based on the results of the on-site inspections of human and civil rights observance, a number of recommendations were made to the structural units of the Volyn Regional Military Administration and local self-government bodies in response to requests for information and applications. Of the 77 recommendations provided, 70 were implemented; 4 are in the process of implementation; and 3 were not implemented.

RECOMMENDATIONS:

Volyn Regional State Administration, Regional Military Administration:

publish on the official website of the Volyn Regional Military Administration the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals";

to ensure the posting of up-to-date contact details, hotline schedules, and proper recording of oral appeals;

publish information of public interest, in particular, on the procedure for submitting and reviewing requests for public information; procedures for appealing against

decisions, actions or inaction of officials; vacancies; use of budget funds and access to open data;

provide for funding and coordination with local governments and balance holders of the facilities on the basis of which temporary accommodation places operate in order to bring the living conditions of internally displaced persons in line with the minimum requirements stipulated by the Procedure for the functioning of temporary accommodation places for IDPs, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of temporary accommodation places for internally displaced persons" dated 01.09.2023;

Ensure that institutions of regional subordination providing services to children comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition;

ensure that institutional care facilities are staffed by qualified practical psychologists in accordance with established standards;

to provide institutional care facilities with a sufficient number of medical staff to organise and carry out round-the-clock duty, to provide timely medical care, as well as to conduct constant monitoring of the organisation and quality of food;

ensure intersectoral cooperation with public authorities, the public sector and business to arrange a transit centre in Volyn region in close proximity to the Domanove-Mokransky checkpoint to ensure a systematic approach to the reception of Ukrainian citizens returning from the temporarily occupied territories;

to ensure architectural accessibility for persons with disabilities and other low-mobility groups to institutions, as well as civil protection facilities of municipal and state ownership, primarily to healthcare, education and social facilities;

Local self-government bodies:

to ensure the observance of the right to information by publishing and regularly updating on the official websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals";

to ensure architectural accessibility of civil protection facilities on the territory of communities, to exercise constant control over ensuring unimpeded access of citizens to them;

ensure compliance with the legislation on the organisation of medical care and nutrition in community educational institutions;

to ensure control over the timely removal by educational institutions of documents containing personal data of students from public access on their websites by depersonalising them;

to train managers and responsible employees of educational institutions on the rules of safe processing, depersonalisation, storage and publication of personal data;

ensure compliance with the requirements of the Law of Ukraine "On Personal Data Protection" and the Model Regulation on Personal Data Processing approved by the Order of the Ukrainian Parliament Commissioner for Human Rights No. 1/02-14 dated 08.01.2014, in particular, regarding the appointment of a person responsible for

organising the processing and protection of personal data, proper informing of personal data subjects and ensuring the separation of employees' access to such data;

to ensure that the rights of clients in residential care units for permanent residence of communal institutions are respected through proper implementation of legislation in the field of social protection, medical care, creation of a barrier-free environment and guarantee of the right to privacy and respect for dignity, with the introduction of mechanisms to prevent repeated violations.

Volyn Regional Territorial Centre for Recruitment and Social Support:

Strengthen internal control and preventive measures by conducting additional briefings with personnel, official inspections for each fact of possible violations of the procedure during mobilisation activities;

to introduce quarterly monitoring of the status of consideration of appeals and requests for information, in particular through internal inspections;

to ensure that officials of the recruitment centres strictly comply with the requirements of the current legislation of Ukraine during the implementation of mobilisation measures, in particular in terms of preventing abuse of power, use of physical force, psychological pressure and other unlawful actions against citizens;

to ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the timeframe established by law.

To the territorial department of the State Judicial Administration of Ukraine in Volyn region and the courts of Volyn region:

to ensure the elimination of systemic violations in courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated convoy routes and arranging rooms for confidential communication with lawyers;

strengthen logistical support to ensure respect for human rights, including the rights to dignity, security, accessibility and effective defence.

11.4. Dnipropetrovsk Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **11,209** appeals from the Dnipro region, containing **13,238** reports of human and civil rights violations.

The most frequently mentioned human rights violations in the reports were: civil rights - **8,950** reports, social rights - **944** reports, economic rights - **878** reports, children's rights - **315** reports, freedom from discrimination - **173** reports, personal rights - **359** reports, political rights - **10** reports, other issues - **1,391** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	3 332	8 517	10 777	11 209
Reports of rights violations	4 293	10 202	12 032	13 238

Dnipropetrovsk oblast is one of the largest in Ukraine by population. Today, the population of the region is **3,093.2 thousand** people. At the same time, the region has hosted a significant number of internally displaced persons who were forced to leave their homes due to the armed aggression of the Russian Federation.

The region is home to **451,299** internally displaced persons, for whom the Dnipro region has become a place of temporary residence, social support and access to basic services.

According to the official information of the Dnipro Regional Military Administration, between 1 January 2025 and 31 December 2025, **4,695** air alerts were declared in the territory of Dnipro region, totalling **9,415 hours and 01 minute**. In fact, this means that for a significant part of the time, residents of the region were under the constant threat of missile and drone attacks, which significantly affects the security situation, the psychological state of the population and the functioning of infrastructure.

During this period, **13,876** shelling of the region's territory was recorded. As a result of armed attacks, **206** buildings, structures and communications were destroyed, including **60** private residential buildings. In addition, **5,910** objects were damaged, including **2,885** private residential buildings, **645** apartment buildings (including dormitories), **75** educational institutions, **15** healthcare facilities and **20** buildings of the State Emergency Service of Ukraine.

As a result of the shelling, **2,127** people were injured, including **106** children. **320** people were killed, including **15** children. At the same time, rescuers rescued **385** people.

These circumstances of armed aggression affect the lives of civilians and lead to gross violations of fundamental human rights, primarily the right to life, security, housing, healthcare and access to education.

In 2025, the Ombudsperson's Office in Dnipro region operated in a difficult security situation, with constant threats to the life and health of the population and a significant burden on the authorities.

The main focus was on protecting the rights of citizens affected by armed aggression, internally displaced persons, persons liable for military service, military families, as well as ensuring access to social, medical, educational and administrative services for citizens of the region.

Monitoring visits/on-site inspections

The main area of work remains ensuring and monitoring the observance of citizens' rights by state authorities, local self-government bodies, institutions and organisations.

In 2025, the Ombudsman's Office in Dnipro region conducted **279** monitoring visits, in particular

28 monitoring visits were carried out in the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention;

to assess the transparency of activities and compliance with legislation in the field of access to public information, protection of personal data by public authorities and local self-government bodies, **41** on-site inspections were conducted to assess compliance with human and civil rights to appeals and information in 2025;

70 monitoring of the observance of the rights of internally displaced persons in places of temporary residence for compliance with the standards set out in the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons" dated 01.09.2023. Monitoring was carried out on the observance of the rights of internally displaced persons (evacuated citizens) to proper living conditions in **5** transit centres and **18** monitoring visits were made to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine";

in the area of child protection, **52** monitoring visits were conducted to ensure the rights of orphans, children deprived of parental care, children in difficult life circumstances and children removed from their parents to proper protection by the state; to family upbringing, to safety, to decent living conditions, to ensure the housing and property rights of orphans and children deprived of parental care, to access to quality healthcare services, to access to education in 2025;

in 2025, **17** monitoring visits were carried out to assess the accessibility of facilities for citizens, which included the level of barrier-free access, convenience and safety of using infrastructure for all categories of the population, including unimpeded access for people with disabilities, people with limited mobility and parents with children;

48 monitoring visits to civil protection facilities in Dnipro city and communities of the region were conducted to provide recommendations for improving the conditions of maintenance and operation of protective structures.

Educational activities

In 2025, the Ombudsman's Office in Dnipro region organised and participated in **70** communication events to ensure interaction with the public and authorities. Also during the year, the Office held **3** human rights forums with the participation of **357** people.

An important event was the opening of the second regional Child Protection Centre in Ukraine, which operates on the Barnahus model. Together with public and charitable organisations, the Child Protection Centre held **15** events involving **434** people.

The main issues addressed by the Ombudsman's Office were:

- Protection of children's rights;
- protection of the rights of internally displaced persons and ensuring their living conditions;
- protection of the right to life and security;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of citizens' information rights.

1. Protection of children's rights

Protecting the rights of every child is one of the priority areas of work of the Ombudsperson's Office in Dnipro region in 2025.

According to the data of the Dnipro Regional Military Administration, the child population of Dnipro region is **559,800** children. The number of children with the status of IDPs is **87,495**; the number of children with the status of a person affected by hostilities and armed conflicts is **16,757**; the number of children with disabilities receiving state social assistance is **13,088**; the number of children with special needs receiving educational services in educational institutions of the Dnipro region is **10,533**; the number of orphans is **2,948**; the number of children deprived of parental care is **4,607**.

As part of the monitoring of the rights of orphans, children deprived of parental care, and children in difficult life circumstances, monitoring visits were conducted in 2025: Children's services - **9**, social service centres - **2**, general education institutions, including those where orphans and children deprived of parental care study - **25**, centres for social and psychological rehabilitation of children - **2**, small group homes - **1**, healthcare institutions - **10**, social support centre for children - **1**, children's recreation centre - **1**, medical rehabilitation and palliative care centre for children - **1**.

In the course of parliamentary control, the Ombudsman's Office in Dnipro region analysed the use of healthcare facilities for temporary placement of children without medical indications. The analysis covered 12 departments in 5 healthcare institutions of the region.

It was found that **34** children stayed in the hospital for 7 calendar days without medical indications; **22** children - 14 calendar days; **11** children - one month. This indicates prolonged institutional detention in a healthcare facility that is not designed for the care and upbringing of children.

This practice of placing children in a healthcare facility without medical indications actually creates conditions of hidden orphanhood, when a child formally has parents or legal representatives but is deprived of family care for a long time, which is contrary to the principle of the best interests of the child.

This practice is the result of an insufficient number of foster families in territorial communities, an inefficient system of social services, insufficient response to cases of

difficult life circumstances in families, and early intervention for families in difficult life circumstances.

These circumstances lead to a violation of a child's right to family upbringing and proper living conditions.

During a monitoring visit to a municipal healthcare facility, it was established that six children of the same family were admitted to a hospital without medical indications due to the mother's failure to fulfil her parental responsibilities and the existing threat to their lives and health.

The guardianship and custody authority of the executive committee of the city council, the local and regional services for children were immediately informed of the discovery, and an interagency response was launched.

At the request of the children's father, the guardianship and custody authority conducted an inspection of the living conditions and prepared a conclusion on the expediency of depriving the mother of parental rights.

By a decision of the executive committee of the city council, the children were temporarily placed in a social protection institution.

The children's father applied to the free legal aid system for legal support and preparation of procedural documents to resolve the issue of the children's future in court.

The Children's Service provides further support to the situation, communicates with the father and monitors the observance of the rights and best interests of the children. At the time of the preparation of the annual report, four of the children are with their father. To place the other two children in his family, the father is undergoing training to obtain custody.

Insufficient consideration of the best interests of the child and the lack of effective cooperation between state authorities lead to violations of children's rights to family upbringing.

As a result, children temporarily lose their family environment and are unjustifiably placed in institutional care facilities, which violates their right to family upbringing. These problems are identified during parliamentary oversight of the observance of children's rights.

During the monitoring visit to the municipal institution "Centre for Social and Psychological Rehabilitation of Children No. 1" of the Kryvyi Rih City Council (hereinafter referred to as the CRC SR), the Representative of the Ombudsperson in the Dnipro region recorded a violation of the child's right to family upbringing.

Through communication with the child by the staff of the CSSFCY, the Head of the Service for Children of the Executive Committee of the Saksagansk District Council (hereinafter - the Service), and analysis of the child's personal file, it was established that the child had been granted the status of an orphan by the decision of the Executive Committee of the Sofiyivka Village Council.

According to the decision of the Saksahansk District Council in Kryvyi Rih, the child's uncle was appointed his guardian. The child lived with the guardian, and had no other family members.

According to the explanations of the child and the CSSFCY staff, it was established that in the evening of 10.12.2025, employees of the Saksahansk Territorial Centre for Recruitment and Social Support detained the minor's guardian and sent him for military service within a day. The same evening, the minor child arrived at the Saksahansk Territorial Centre for Recruitment and Social Support on his own to provide documents confirming the establishment of custody. However, the child and his arguments were ignored.

The child, due to being left without parental care, was enrolled in the SACCFs for a 24-hour temporary stay.

The Ombudsman's Office sent an appeal to the Ministry of Defence of Ukraine with documents confirming the grounds for the guardian's dismissal from military service due to family circumstances.

As a result of these measures, the guardian was discharged from military service. The child's right to family upbringing was restored.

In the region, violations of children's rights to adequate housing conditions were identified due to the improper exercise of powers by local authorities in the field of housing for family-based care.

The problem lies in the placement of children in families without prior provision of housing or without timely improvement of housing conditions.

As a result, children live in inadequate housing conditions, which can have a negative impact on their health and development.

During the parliamentary control, inadequate living, educational and developmental conditions were found for nine children of one family who lived in a two-room house together with their guardian and her two minor children. The inspection revealed unsanitary conditions, lack of gas supply and a bathroom, unsatisfactory technical condition of the house, stove heating, insufficient number of beds and lack of conditions for study and recreation.

The Ombudsman's Office in Dnipro region held consultations with the guardianship and custody authority, the children's service, and sent a letter to the city council to improve the living conditions or provide alternative accommodation for the family.

As a result of the response, the local government received a state subvention, purchased a residential building for the newly created FBO, and renovated and furnished it with the support of charitable organisations.

In accordance with a city council resolution, a family-type orphanage was established, with 9 children placed there.

During the visit to the healthcare facility and communication with the administration, information was received about violations of the rights of newborn

children abandoned in the healthcare facility, including the right to timely state registration of birth, acquisition of a name and citizenship.

The main reasons for this are untimely notification of the competent authorities and insufficient interagency cooperation between healthcare facilities, the National Police and children's services.

This practice results in newborns staying in medical institutions for long periods of time without a defined legal status, which makes it impossible to exercise their basic rights guaranteed by Article 7 of the UN Convention on the Rights of the Child and Article 144 of the Family Code of Ukraine, and limits access to social protection and further family placement.

The Ombudsperson's Office in Dnipro region has developed a mechanism for responding to and restoring violated children's rights, which includes communication between the Ombudsperson's representative in Dnipro region and healthcare institutions in the region. In case of absence of timely response from the children's service, the administration of the healthcare institution addresses the representative of the Commissioner in Dnipro region for immediate measures aimed at protecting the rights and legitimate interests of the child.

With the assistance of the Ombudsman's Office in Dnipro region, upon receipt of information about an abandoned newborn child, urgent measures are taken, including official notification of the National Police, execution of a relevant act with the participation of the healthcare facility and establishment of cooperation with the children's service of the local self-government body.

The Ombudsman's representative in Dnipro region received information about a case of gross violation of the rights of a child who was abandoned by her mother immediately after birth in a maternity hospital.

The newborn girl was undergoing inpatient treatment and was left without any care: the parents did not come to the medical institution, did not keep in touch with the doctors, and did not participate in the child's fate. The girl did not have a birth certificate, which is a violation of the child's right to birth registration, name and citizenship.

With the assistance of the Ombudsperson's representative in Dnipro region, the healthcare facility officially informed the National Police about the abandonment of the child; a report was drawn up jointly with the police and the healthcare facility; and cooperation with the children's service of the executive committee of the local council was initiated.

As a result of the response measures taken by the representative of the Commissioner in Dnipropetrovska oblast, based on the decision of the local government, in March 2025, the child's birth was registered by the state, which allowed to restore his legal status and open up opportunities for social protection, medical care, guardianship or further family placement.

The girl was granted the status of a child deprived of parental care by the Executive Committee of the City Council of Dnipropetrovs'k Region. Currently, the child is on full state support in a boarding school in Chernivtsi region.

In 2025, the Ombudsman's Office in Dnipro region conducted monitoring visits to 25 educational institutions in the region to check the status of ensuring children's rights to safe learning conditions under martial law. As a result, a number of violations of children's rights were identified.

In particular, a case of the absence of an equipped civil defence building directly in the educational institution was identified, and therefore children receive education in another institution. However, the organisation of bus transportation of students to another place of study is carried out without due regard for security factors and emergency algorithms.

There were also 11 instances of improper storage of medicines and understaffing of first aid kits. It was found that the material and technical base and premises of educational institutions do not comply with the requirements of the Sanitary Regulations for General Secondary Education Institutions, approved by the Order of the Ministry of Health of Ukraine No. 2205 of 25.09.2020.

The analysis of the monitoring results allowed us to identify systemic shortcomings:

70% of the visited institutions do not have a licence to carry out economic activities in medical practice, which is a violation of the child's right to receive quality medical services;

in 80% of cases, nurses independently prescribe treatment for students, which goes beyond their job descriptions and competence;

in 90% of institutions, the approved menus do not meet the standards for the consumption of the main food groups defined by the Resolution of the Cabinet of Ministers of Ukraine No. 305 of 24.03.2021;

in 70% of institutions, there is a lack of daily sampling of finished products and goods sold through cafeterias, which contradicts the requirements of the Procedure for organising catering in educational institutions and children's health and recreation facilities;

there is a critical shortage of psychological service staff. In particular, there are no practical psychologists in 3 institutions and no social workers in 22 institutions.

Based on the results of the monitoring, 25 response letters with 236 recommendations were prepared and sent to the regional military administration, local authorities, children's services and educational institutions to address the identified violations.

A monitoring visit to a general secondary education institution of the city council revealed violations of students' rights to a safe educational environment.

In particular, the activities of the medical office of the institution were regulated by outdated regulations, which made it impossible to properly monitor the condition of the food unit and sanitary facilities, and led to the accumulation of expired medicines.

The state of catering was of particular concern. The monitoring group recorded the presence of expired food, the use of ingredients of unknown origin without appropriate labelling and the disregard for the procedure for taking daily samples of finished products.

In addition, the canteen premises were in a state of disrepair with signs of significant contamination and outdated equipment, and the waste collection point was organised directly in the dining room without complying with hygiene requirements.

Based on the recommendations, the administration of the facility updated the Regulations on the medical office in accordance with the requirements of the Sanitary Regulations and disposed of unusable medicines. The canteen was renovated. The control of the quality control committee was also strengthened through the rotation of its members and the involvement of the parent community, which allowed for systematic supervision of the quality of products and their storage conditions in the current academic year.

The timely response to the identified violations allowed us to restore the right of students to safe conditions in the educational institution and minimise risks to their health.

The status of implementation of the recommendations and measures taken to restore the violated rights of children is monitored by the staff of the Ombudsman's Office in Dnipro region. Out of **850** recommendations: **528** have been implemented; **264** are in the process of implementation; **54** have not been implemented.

2. Protection of the rights of internally displaced persons and ensuring their living conditions

According to the official information of the Dnipro Regional Military Administration, as of 31 December 2025, the number of internally displaced persons in the region is **451,299**, including: **264,162** women, **187,137** men, **89,751** children and **107,328** pensioners.

In 2025, **5** transit centres have been set up and are operating in the region to receive and register the evacuated population and send them to places of permanent (temporary) accommodation in safe regions.

There are **135** temporary accommodation facilities for internally displaced persons in the Dnipro region. In 2025, **70** visits were made to monitor the observance of IDPs' rights in the TACs and checked for compliance with the standards set out in the Procedure for the Functioning of Temporary Accommodation Sites for Internally Displaced Persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some Issues of Functioning of Temporary Accommodation Sites for Internally Displaced Persons" dated 01.09.2023.

The key issues raised by IDPs from Dnipropetrovska oblast with the Ukrainian Parliament Commissioner for Human Rights are inadequate living conditions in temporary accommodation, lack of social housing, employment issues, non-payment of housing allowance, etc.

Based on the results of the visits, the regional military administration received recommendations to comply with the living conditions of internally displaced persons in accordance with the requirements of the Resolution of the Cabinet of Ministers of Ukraine

of 01.09.2023 No. 930, namely: to take measures to carry out repair work in bathrooms and showers while respecting the right to privacy; to replace windows that were mostly damaged by explosions; to provide furniture, household appliances, washing machines and dryers.

Out of **273** recommendations, **37** were implemented; **235** were in the process of implementation; and **1** was not implemented.

In order to exercise parliamentary control over the observance of the rights to proper living conditions of internally displaced persons, students, including orphans, children deprived of parental care and persons from among them, the staff of the Ombudsman's Office in Dnipro region conducted a monitoring visit to dormitories No. 1, No. 2 and No. 3 of the Oles Honchar Dnipro National University.

During the monitoring, a number of violations were identified that required urgent and mandatory elimination. The shelter of the dormitory was in an unsatisfactory condition, with limited access for people with limited mobility; no repairs had been carried out after the shelling, and the windows were broken or boarded up with plywood. The territory of the dormitories is fenced, but the existing fence has numerous damages, including large holes and gaps. Cockroaches were found in rooms, kitchens, bathrooms and corridors. Shower rooms, bathrooms and corridors showed signs of high humidity, mould and fungus on the walls and ceiling, resulting from prolonged exposure to moisture, lack of proper ventilation and chronic neglect of sanitary requirements. Kitchens, laundry rooms and other common areas were in an unsanitary condition, and ventilation hoods were soiled and in need of cleaning. The ceilings had damage with signs of roof leaks, mould, and peeling paint. The furniture in the rooms was outdated and partially damaged, in insufficient quantity to meet the basic needs of the residents.

A report with recommendations was sent to the Dnipro Regional Military Administration, the Main Department of the State Emergency Service of Ukraine in Dnipro Region and Oles Honchar Dnipro National University. In addition, a letter was prepared and sent to the Ministry of Education and Science of Ukraine.

To eliminate the deficiencies, a set of repair and restoration works was carried out, including: restoration of the damaged paintwork, cleaning and disinfection of shower rooms, audit and testing of exhaust devices, replacement of windows, repair of seven sections of the fence, repair of walls and installation of doors in shower rooms, cosmetic repairs of the storage room, and production and installation of illuminated information signs.

In response to the complaint, the management of Oles Honchar Dnipro National University informed about the measures taken to eliminate the violations, which is confirmed by the photo report provided. In addition, the university has established partnerships with a number of humanitarian organisations and charitable foundations.

3. Protection of the rights to life and safety

Providing the population with shelters and civil defence structures is one of the key elements of the human right to security and protection of life under martial law.

In 2025, **48** monitoring visits were carried out to civil protection facilities in the city of Dnipro and communities of the region.

The monitoring visits were carried out to assess the effectiveness of protective structures, identify technical deficiencies and help create appropriate conditions for the protection of life and health of citizens.

The main problems include the unsatisfactory technical condition of 5 shelters; 5 shelters do not meet modern safety requirements; 7 shelters have limited accessibility for people with limited mobility; 15 civil protection facilities have a low level of public awareness of their locations.

Based on the results of the visits, the following recommendations were made to the owners of protective structures: take measures to carry out repair work in shelters; install information signs and traffic signs at the entrance to provide citizens with access to information on the availability of shelters and contact details of the owner; provide shelters with drinking and industrial water, long-term storage products; provide shelters with firefighting equipment, including shovels and fire extinguishers; take measures to ensure round-the-clock access to shelters for the public.

Out of **144** recommendations provided, **14** were implemented; **125** were in the process of implementation; and **5** were not implemented.

In order to exercise parliamentary control, a monitoring visit was conducted on 03.09.2025 to the civilian shelter facility in the basement of the Municipal Cultural Institution "Dnipro City Public Libraries" of the Dnipro City Council.

During the monitoring visit, it was found that there was no first aid kit in the shelter itself. In the course of communication with the responsible person, it was found out that the first aid kit is kept on the security watch. This indicates a violation of the requirements of Order of the Ministry of Internal Affairs of Ukraine No. 579 of 09.07.2018 in terms of equipping the protective structure with medical equipment, since the placement of the first aid kit outside the shelter makes it impossible for persons in the shelter to use it promptly during an emergency.

Based on the report with a number of recommendations, the owner of the shelter was urgently asked to eliminate the identified deficiencies and provide the shelter with a complete first aid kit with the necessary medicines and first aid equipment. In addition, a stock of non-food items for children was prepared for the possible number of children in the shelter, the number of seats was increased and a stock of long-term storage food was prepared.

In the context of martial law, the issue of accessibility of shelters for the population is of critical importance. In this regard, the Ombudsman's Office in Dnipropetrovska oblast conducted a selective monitoring of official websites of 12 territorial communities

of Dnipropetrovska oblast to analyse information on the availability of civil protection shelters.

The analysis of the official websites of 12 territorial communities in the Dnipro region shows that the population is unevenly provided with civil protection facilities.

The number of shelters published on the websites of the analysed 12 communities is relatively small and varies significantly depending on the community: from **11** shelters in Zelenodolsk city community to **70** shelters in Zhovtovodsk city community. Such a disparity may indicate both an objective difference in the population and area of the communities and a different level of organisation of accounting, inventory and disclosure of information on protective structures.

At the same time, the data available in the Diia app shows a much higher total number of shelters in the region - **1,448** objects of various types. This indicates that there are discrepancies between local information resources of territorial communities and centralised state registers, which may make it difficult for the population to access up-to-date and complete information about available shelters, especially in the face of the threat of emergencies or military operations.

Special attention should be paid to the city of Dnipro, which has **800** protective structures, most of which are simple shelters - **424** units. At the same time, the number of full-fledged shelters (**303**) and radiation shelters (**2**) is insufficient and cannot fully meet the needs of the population for an adequate level of protection in view of current security challenges.

In general, the data obtained indicate the urgency of the problem of sufficiency, quality and accessibility of shelters in the Dnipro region, as well as the need to strengthen coordination between local governments and state bodies to maintain a unified record of protective structures, update information and make it public in a timely manner.

In order to exercise parliamentary control, a monitoring visit was conducted to the civil protection facility located at the Municipal Out-of-School Educational Institution "Palace of Children and Youth Creativity" of the Dnipro City Council.

The findings revealed violations of sanitary and health requirements for the maintenance of the protective structure, including traces of mould and fungus, as well as the storage of expired food and medicines in the shelter. These facts contradict the requirements of the legislation in the field of healthcare, circulation of medicines and food safety and pose a potential threat to the lives and health of people in the shelter.

The violations identified in the Commissioner's report have been eliminated. In particular, the expiry dates of medicines were monitored and expired medicines were replaced, food stocks were updated in accordance with the established requirements, and the premises were sanitised to eliminate dampness and mould.

4. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances

In 2025, the Ombudsman's Office in Dnipro region dealt with issues raised by servicemen, veterans, members of their families and persons liable for military service.

Since May 2025, a regional working group of the Coordination Headquarters on the treatment of prisoners of war has been operating on the basis of the Ombudsman's Office in Dnipro region, with its powers extending to the territory of Dnipro and Zaporizhzhia regions.

During this time, **30** meetings were held with the families of prisoners of war and missing persons under special circumstances, with **1444** people participating.

We processed **262** telephone calls, received **93** written appeals, registered **98** personal accounts in the information system of the Coordination Headquarters for the Treatment of Prisoners of War; and held personal meetings with **106** citizens.

The main problematic issues that citizens addressed and received consultations on were: the timing and mechanisms of exchanges (76 consultations); the algorithm of actions in case of a missing serviceman (173 consultations); communication with the command and investigative bodies (58 consultations). The low level of awareness of families, lack of communication and untimely provision of procedural documents by the command of military units and representatives of territorial recruitment and social support centres, including at the request of persons liable for military service, remain a problem.

During the reporting year, the Ombudsman's Office in Dnipro region also monitored media and Internet resources on the issues of observance of the rights of servicemen, war veterans, persons liable for military service, family members of servicemen held in Russian captivity, and families of persons missing in action under special circumstances.

The monitoring included media publications, official communications from government authorities, oral and written appeals from citizens, including on social media, and materials from human rights organisations. The analysis revealed signs of possible human rights violations, in particular in the areas of compliance with the mobilisation procedure and verification of the grounds for granting deferment; provision of social guarantees and benefits to military personnel and their families; compliance with military registration procedures and personal data management.

During an on-site reception of citizens, a former serviceman reported a violation of his socio-economic rights by a military unit to the Ombudsman's representative in Dnipro region.

The applicant reported that while performing a combat mission, he had been seriously injured and lost his lower limb. At the time of his application, he had not received any statutory social benefits due to the failure of the military unit to provide the necessary documents.

Response measures were taken to restore the serviceman's socio-economic rights. The Ombudsman's representative provided constant support to the applicant in order to obtain the appropriate social benefits.

As a result of the Office's assistance in resolving the issue, the former serviceman received the social benefits due to him.

Regarding 23 publications in mass media and regional Internet resources, the TCC and JV bodies of Dnipro region informed the Ombudsman's representative that the information contained in the publications was not confirmed, or was subjective, or related to incomplete or one-sided coverage of the circumstances.

The responses received indicate that the CMC and JIC bodies of Dnipro region mostly declare compliance with the requirements of the law, but the results of monitoring of regional media and Internet resources indicate that there are problems in the field of communication, information and individual approach to resolving issues related to the rights of persons liable for military service, servicemen and women and their families.

This confirms the need for further parliamentary control, strengthening of interagency cooperation and raising legal awareness of both officials and citizens.

The Ombudsman received an appeal from the mother of a person liable for military service regarding possible violation of the mobilisation procedure by the Territorial Centre for Recruitment and Social Support and proper verification of the grounds for granting a deferral from military service during mobilisation.

The applicant, an internally displaced person with a disability of group II, reported the need for constant external care, which was confirmed by a relevant medical report.

As part of the parliamentary oversight, the Ombudsman's Office in Dnipro region verified the facts and analysed them for compliance with the law.

In order to restore the right of a person liable for military service to receive a postponement of the call-up during mobilisation, relevant requests were sent, and a working meeting was held between the Commissioner's representative and the management of the Dnipro Regional Territorial Centre for Recruitment and Social Support.

As a result of the measures taken and the response of the Ombudsman's representative, employees of the Central Chechelivsk Joint District Recruitment and Social Support Centre re-checked the grounds for granting a deferment and the serviceman was granted a deferment from mobilisation.

At the same time, the issue of social support was resolved for the applicant, an internally displaced person with a group 2 disability, with the assistance of the Ombudsman's office.

The Ukrainian Parliamentary Commissioner for Human Rights received a written appeal from a citizen, a serviceman who was in the status of missing, regarding violation of his right to appeal and financial support.

During the consideration of the complaint materials, it was established that the applicant had sent an appeal to the military unit to receive the payments due to him in connection with his status as a missing person. Due to the failure to respond to this appeal, the applicant repeatedly filed a complaint with the command through the General Staff of the Armed Forces of Ukraine.

At the time of applying to the Ombudsman, the applicant had not received a response to his appeals.

With the assistance of the Ombudsman's Office in Dnipro region and as a result of the measures taken, the military unit headquarters processed the applicant's appeal, sent through the General Staff of the Armed Forces of Ukraine, regarding non-payment of financial support and additional remuneration for the period from 24.02.2022 to 09.08.2022.

Based on the results of processing within the competence, it was reported that the order of the military unit commander appointed an internal inspection on the fact of the applicant's appeal. Subsequently, the Ombudsman and the applicant were informed about the accrual and payment of the applicant's financial support and additional remuneration for the period from 24.02.2022 to 09.08.2022.

In 2025, the Ombudsman's Office in Dnipro region visited 2 brig stations to check compliance with the rights of servicemen, prevent cruel or inhuman treatment, identify shortcomings in the conditions of detention and provide recommendations for their elimination.

In particular, the visits revealed the need to repair the premises, including engineering networks; the lack of forced mechanical ventilation in the cells with the possibility of supplying warm air in the cold season; and the lack of premises for long visits.

Particular attention was paid to the observance of the procedure for recording bodily injuries of convicts, detainees, arrested and detained military personnel, in particular, the proper maintenance of a logbook of bodily injuries. Recommendations were made in this regard.

It was also established that there is no defined procedure for providing dietary nutrition to forcibly detained military personnel on medical grounds.

In total, the visits resulted in 20 recommendations, which are currently being implemented.

5. Protection of citizens' information rights

In order to assess the transparency of activities and compliance with legislation in the field of access to public information, the right to appeal by state authorities and local self-government bodies, the Commissioner's Office in Dnipro region conducted 41 on-site inspections in 2025 on the observance of human and civil rights to appeals and information.

The inspection revealed the following typical violations: 37 inspected objects did not fully publish the information required by Article 15 of the Law of Ukraine "On Access to Public Information"; 31 inspected objects did not update information in the form of open data on the Unified State Open Data Web Portal and 9 inspected objects did not update information on the Unified Web Portal for the Use of Public Funds; 17 objects did not have materials on the exercise of the right of community residents to appeal to citizens.

To eliminate the identified violations, the monitoring objects were recommended to: 33 monitored objects should ensure availability of information on the exercise of the

right of citizens to appeal and the procedure for submitting requests for public information on the official website and in the premises of the institution; provide for the possibility of submitting oral appeals and making an appointment for a personal reception for 11 objects ; ensure publication and constant updating of information in the form of open data on the Unified State Open Data Portal for 29 monitored objects.

During the on-site inspection of the website of the village territorial community of Kryvyi Rih district, Dnipro region, a number of violations were identified. In particular, the website does not contain information on the schedule and procedure for personal reception of citizens by the head and other officials; public information in the form of open data is not published on the Unified State Open Data Web Portal; and the information on the unified web portal for the use of public funds, as provided for by the Law of Ukraine "On Access to Public Information", is not constantly updated.

Based on the results of the audit, a report with recommendations was drawn up and sent to the chairman of the village council to eliminate the violations.

The officials of the settlement council worked to streamline and update the information on the official website, taking into account the comments on the information content provided in the report.

Of the **152** recommendations provided, **115** were implemented; **32** were in the process of implementation; and **5** were not implemented.

RECOMMENDATIONS:

Dnipro Regional State Administration, Regional Military Administration:

Ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, including those in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930, with the possibility of further confirmation of compliance with the established standards;

to facilitate the attraction of additional resources, including government programmes, humanitarian aid and international technical support for repair and restoration work in places of temporary residence of internally displaced persons;

strengthen information and awareness-raising activities to encourage the development of foster families in the region;

Ensure that educational institutions comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition;

exercise control to prevent excessive temporary placement of children in healthcare facilities.

Local self-government bodies:

to provide for expenditures in local budgets for current and capital repairs, sanitation, disinfection and renewal of the material and technical base of dormitories where temporary accommodation facilities and shelters operate;

to strengthen control over the technical condition of the premises of temporary accommodation facilities for internally displaced persons, as well as to ensure that their right to safe, proper and decent living conditions is respected in accordance with established standards;

ensure that guardianship and custody authorities properly fulfil their powers in the area of housing for family-based care;

to equip protective structures in pre-school and secondary education institutions to ensure the safety of participants in the educational process during study;

to ensure the availability of information on the procedure for exercising the right to apply and submit requests for public information on the website and in the premises of local self-government bodies. Provide for the possibility of submitting oral appeals, pre-registering for an appointment with the recording of appeals, publishing information of public interest, in particular on the procedure for appealing decisions, and providing for a workplace for reviewing documents, copying, scanning and saving them on media.

Dnipro Regional Centre for Recruitment and Social Support:

to ensure timely and proper consideration of appeals from servicemen, veterans, persons liable for military service and their family members with mandatory compliance with the requirements of the Law of Ukraine "On Citizens' Appeals";

in order to ensure proper exercise of powers and increase the level of public trust, strengthen communication and systematic informing of the families of prisoners of war and persons missing under special circumstances on issues within the competence of the TCC and JV, in particular, on the procedure for submitting and reviewing appeals, algorithms for interaction with authorised bodies, approximate timeframes for processing documents and available mechanisms for protecting rights and social guarantees;

ensure objective, comprehensive and individual verification of the grounds for granting deferment from conscription in accordance with the requirements of the law, with proper documentation of the decisions taken and their motivation in order to respect the rights of citizens and prevent a formal approach during the implementation of mobilisation measures.

To the military authorities:

to prevent violations of the rights of persons held in brig, ensure that the conditions of detention are brought in line with the requirements of national legislation and international standards, ensure that bodily injuries are properly recorded in accordance with established procedures, and organise dietary food for medical reasons.

11.5. Donetsk and Luhansk Regions

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **1,435** appeals from Donetsk region, containing **1,693** reports of human rights violations. Luhansk region received **145** appeals containing **191** reports. The most frequently mentioned human rights violations included: civil rights - **960** reports, social rights - **369** reports, economic rights - **188** reports, personal rights - **65** reports, children's rights - **47** reports, other - **137** reports. There were **24** personal receptions of citizens.

The number of	2022	2023	2024	2025
Appeals/requests from citizens of Donetsk region	2 230/2 521	1901/ 2 194	1 805/2 002	1 435/1 693
Appeals/requests from the citizens of luhansk region	407/4 67	115/1 45	101/ 127	145/1 91

In 2025, the territory of Donetsk region remained one of the most intense areas of hostilities on the frontline. As of 01 January 2026, 4 out of 8 districts of the region were fully occupied (3 of them have been under occupation since 2014). Kramatorsk, Pokrovsk, Bakhmut and Volnovakha districts remain partially occupied. Of the 66 territorial communities in the region, 38 are fully temporarily occupied (20 of them have been since 2014), while 9 other territorial communities are under partial temporary occupation 884 settlements in Donetsk region are under temporary occupation, 414 settlements are under the control of the Ukrainian government.

Constant shelling of communities in Donetsk region causes destruction of civilian infrastructure and results in civilian casualties. In 2025, 3,667 civilians suffered from Russian shelling in Donetsk region, including 652 killed and 3,015 injured.

According to the Luhansk Regional Military Administration, almost the entire territory of Luhansk region is temporarily occupied, except for 16 settlements in Siverskodonetsk and Svatove districts, which are in the area of active hostilities. As of February 2025, 8 people (including 5 people of retirement age, no children) were registered in Balka Zhuravka of the Krasnorichenska territorial community of Svatove district, Luhansk region, who had provided written refusals to be evacuated. As of the end of 2025, no other information was received.

Monitoring visits/on-site inspections

In 2025, **21** monitoring visits and inspections were carried out in Donetsk and Luhansk regions:

- 8** - on the observance of the rights of persons affected by armed aggression;
- 4** - within the framework of the national preventive mechanism;
- 4** - to ensure equal rights and freedoms;
- 3** - on issues of observance of human and civil rights to appeals and information;
- 1** - on observance of children's rights;
- 1** - on observance of social and economic rights.

Educational activities

In order to raise awareness about the protection of human and civil rights and freedoms, the Ukrainian Parliament Commissioner for Human Rights in Donetsk and Luhansk regions initiated and held **12** educational events involving **264** representatives of the public, students of general secondary education institutions, higher education students, academic staff of higher education institutions, employees of local self-government bodies, state authorities, community members, military personnel, veterans and their families. At the same time, the occupation of large areas and the security situation caused by the hostilities impede the active conduct of mass information and educational activities in Donetsk and Luhansk regions.

Main issues addressed by the Ombudsperson's Office:

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances
- protection of children's rights;
- protection of the rights of citizens affected by armed aggression;
- protection of social and economic rights of citizens;
- protection of information rights.

1. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing under special circumstances

In the context of the ongoing Russian aggression against Ukraine in the Donetsk and Luhansk regions for more than 12 years, the issue of observance of the rights of servicemen and veterans, as well as members of their families, remains one of the most pressing.

According to the Department of Veterans' Policy of the Donetsk Regional Military Administration, as of the end of 2025, **43,291** combatants, **7,717** war veterans, **2,813** persons with war-related disabilities and **4,920** family members of deceased war veterans/defenders of Ukraine were registered in Donetsk region.

According to the Veterans Policy Department of the Luhansk Regional Military Administration, as of the end of 2025, **5,924** combatants, **76** war veterans, **256** persons with war-related disabilities and **669** family members of deceased war veterans/defenders of Ukraine were registered in Luhansk communities.

In 2025, the Ombudsman's representative in Donetsk and Luhansk regions took part in **23** meetings with family members of the deceased, missing under special circumstances and prisoners of war. These meetings were attended by 426 family members of the defenders of Ukraine.

As a result, the families were informed about the state policy on social guarantees, the process of searching for missing persons and returning captured defenders, as well as provided with other legal advice on social and legal issues. The Ombudsman held **19** personal receptions of citizens in the area of observance of the rights of servicemen, veterans and their families.

Most often, the Ombudsman was approached by family members of missing persons under special circumstances to assist in establishing the possible presence of a missing serviceman in captivity of the aggressor country. In addition, the issues of facilitating communication between veterans discharged from the reserve and family members of prisoners of war and those who went missing under special circumstances, on the one hand, and military units, on the other, remained relevant.

In October 2025, a citizen P. filed a complaint with the Ombudsman about a violation of his right to access information by the military unit where he had served before being discharged.

The veteran requested information from the military unit about his period of service, financial support, participation in hostilities and use of annual leave. This information was necessary for further defence of his interests in court. However, the military unit did not provide full information at the applicant's request.

In order to respond to the veteran's complaint, the Ombudsman's representative sent a letter to the Operational Command "East" of the Land Forces of the Armed Forces of Ukraine. As a result, the applicant was provided with all the requested documents, which allowed him to restore his right to information and proper protection of his rights in court.

A separate problem in the area of protection of the rights of veterans and their families is the interagency inconsistency between military units, territorial recruitment and social support centres, military medical commissions and other military and state authorities. This creates preconditions for violations of the rights of both active military personnel and veterans who have been discharged and family members of deceased/dead defenders.

In August 2025, citizen H. filed a complaint with the Ombudsman about violation of the right of family members of a serviceman to timely social protection due to improper documentation of the circumstances of the serviceman's death and interagency inconsistency.

Thus, in March 2023, her husband, a member of the Defence Forces of Ukraine, was removed from the military unit's lists due to his transfer to another place of service. However, he did not arrive at his destination due to his death in a hospital in Dnipro on the way to his new military unit. For more than 2 years, the family of the serviceman could not obtain the status of family members of the deceased defender of Ukraine.

In order to restore the applicant's right, the relevant response acts were sent to the command and control bodies of the relevant military unit. Based on the results of the Ombudsman's appeal, the military unit appointed an internal investigation with all relevant documents sent to the military medical commission.

After the military medical commission reviewed the issue, all relevant documents were sent to the CMC and JV at the place of registration of the serviceman, which restored the right of citizen H. to social protection of family members of the deceased serviceman.

The systematic activities of the Ombudsman aimed at monitoring the observance of the rights of veterans and their families in the region have yielded positive results. For example, in the Annual Report on the state of observance and protection of human and civil rights and freedoms in Ukraine in 2024, the Ombudsman drew attention to the absence of the appointment of the Head of the Veterans' Policy Department of the Luhansk Regional Military Administration for a long time, which had a negative impact on the observance of veterans' rights in Luhansk region. The regional military administration was recommended to speed up the consideration of candidates and appoint the head of the Department. In 2025, the Commissioner's recommendation was implemented.

As of the end of 2025, the Veterans Policy Department of the Luhansk Regional Military Administration developed a mechanism for employing specialists to support war veterans and demobilised persons. At present, 17 positions of specialists in support of war veterans and demobilised persons have been included in the staffing lists of the region's relocated institutions, including 8 in healthcare institutions, 9 in social service providers.

The introduction of the positions of specialists in support of war veterans and demobilised persons is an important tool for ensuring the right of veterans to social protection, medical care and access to state guarantees, especially in the context of the temporary occupation of the territory of Luhansk region and the relocation of authorities and institutions. Such specialists provide individual support to veterans and their families, assist in obtaining statuses, social benefits, medical, rehabilitation and other services, and help restore their social adaptation after discharge from military service.

The measures taken by the Ombudsman allowed to intensify the work on ensuring the rights of veterans and their families in the relocated communities of Luhansk region.

Ensuring the rights of servicemen, veterans and their families remains one of the priorities of the Ombudsman's Office and the Regional Office.

2. Protection of children's rights

In the context of the ongoing armed aggression of the Russian Federation, ensuring the safety of children in the areas of active hostilities remained one of the priority areas of activity. Particular attention was paid to the mandatory evacuation of children under duress accompanied by their legal representatives, as the timely removal of children from high-risk areas is critical to preserving their lives and health. Thus, according to the Donetsk Regional Military Administration, in 2025, **13,900** children were evacuated from the territory of Donetsk region, of whom **6,073** were forcibly evacuated. At the same time, as of the end of 2025, **12.4 thousand** children live in the government-controlled territory of Ukraine within the Donetsk region

During the evacuation, a number of problematic issues arise, including the refusal to evacuate and the return of some families to the areas of active hostilities. The regional office of the Ombudsperson in Donetsk and Luhansk regions is taking a range of measures to ensure the fundamental and inalienable rights of children - the right to life and health.

In order to exercise parliamentary control over the observance of children's rights in the context of the armed conflict, the regional office twice initiated and held working meetings with representatives of the Donetsk Regional Military Administration, courts, the Main Department of the National Police in Donetsk region, and the Donetsk Regional Prosecutor's Office. The results of these meetings identified a number of problematic issues.

In particular, it was established that village, town and city military administrations in Donetsk region, with the exception of the Pokrovsk city military administration, prefer not to evacuate children in exceptional cases, by taking the child away without depriving the parents of parental rights. Even in the case of a clear threat to the child's life and health due to shelling by Russian troops. This entails leaving some families in settlements where the security situation is deteriorating. After the evacuation measures were suspended due to the security situation, such families continue to go into hiding. Subsequently, they end up with their children in the temporarily occupied territories. In some cases, children are killed and injured as a result of shelling by the aggressor country's army. According to the Donetsk Regional Military Administration, in 2025, 87 children suffered from Russian shelling in the Donetsk region, of whom 9 were killed and 78 were injured.

There is a separate issue of returning families with children after evacuation to settlements in the areas of hostilities. For example, after evacuation to safer regions, there are problems with the support and integration of families with children into host communities. As a rule, some families with children face a series of social challenges in difficult life circumstances. Subsequently, they decide to return to Donetsk region. However, such families sometimes do not return to their place of registration, but stay in other communities of the region, which causes difficulties for the evacuation teams of the National Police due to the difficulty of identifying such families with children for the purpose of their re-evacuation.

The regional office of the Ombudsperson conducted a monitoring visit to observe the rights of the child in the frontline town of Bilozerske, Pokrovsk district, Donetsk region.

In September 2025, during the media monitoring, a publication was found

about the prolonged stay of three young children, two of whom have serious illnesses, in the frontline town of Bilozerske, Pokrovsk district, without proper parental care and state care. At the time of publication, the children were already in a charity centre in Chernivtsi. Chernivtsi.

In order to verify the above facts, the Commissioner sent two groups of regional offices to Bilozerske and to the charity centre in Chernivtsi. The inspection revealed that the information was partially confirmed. In particular, the children were not actually deprived of their mother's parental care during their stay in Bilozerske. The Bilozerske City Military Administration evacuated the family in advance in May 2025. That is, before the introduction of compulsory evacuation of children by force.

At the same time, a number of violations of child protection legislation were identified. Despite their difficult life circumstances, the family was not registered as being in need of social support. The information about the family was not timely transferred to the children's service of the host community to organise proper social support after the evacuation.

As a result of the Ombudsperson's response, the Service for Children of Bilozerka City Council sent a letter to the Service for Children of Chernivtsi, after which the family was provided with social support at the place of actual residence.

The ongoing armed aggression of the Russian Federation against Ukraine and the temporary occupation of part of Ukraine's territories by the aggressor state have an impact on the realisation of children's fundamental rights, including their physical and mental health. Article 30⁽¹⁾ of the Law of Ukraine "On Protection of Childhood" stipulates that the state shall take all necessary measures to ensure the protection of children in the area of hostilities and armed conflicts, as well as children affected by hostilities and armed conflicts. The aforementioned Law provides for the granting of the status of a child affected by hostilities and armed conflicts.

Resolution of the Cabinet of Ministers of Ukraine No. 268 dated 05.04.2017 approved the Procedure for Granting the Status of a Child Affected by Military Operations and Armed Conflicts (hereinafter - the Procedure).

This status entitles the child to a number of benefits, including free meals in state and municipal educational institutions and the possibility of receiving healthcare services. These benefits are provided by local authorities at the community level.

Due to the full-scale Russian armed aggression and the temporary occupation of communities in Donetsk and Luhansk oblasts, tens of thousands of families were forced to move to safer areas of Ukraine. The existing algorithm of the Procedure at that time provided for the granting of such status at the place of actual residence of the child as an internally displaced person. As a result, families with children who were sheltered in host communities could not apply to the guardianship and custody authorities of the community of origin. This leads to a limitation of the extraterritoriality of such a service.

This was a real challenge, as it significantly increased the workload of child services workers in host communities. As a result, the long processing of applications led

to delays in the consideration and granting of such status to children. This, in turn, restricted the child's right to use the available benefits.

As a result of the Commissioner's response, in 2025, the Ministry of Social Policy, Family and Unity of Ukraine amended the Law of Ukraine "On Child Protection" and the Procedure, which expands the possibilities of obtaining the status and applying to the guardianship authorities of the communities of origin that were relocated to other regions of Ukraine.

To date, even after the amendments to the legislation, there has been no increase in the number of applications for such status to the services for children in Donetsk and Luhansk regions.

According to the information received from the State Service of Ukraine for Children, as of the end of 2025, the number of applications received by the guardianship and custody authorities of Donetsk region was **36,975**, while in 2024 the number was **36,691** (an increase of 0.8%). In Luhansk region, the number of applications at the end of 2025 remained unchanged compared to the end of 2024 (**34,480** and **34,480** applications respectively). A similar situation is observed with regard to the indicator of granting the status of a child affected by hostilities and armed conflicts. In Donetsk region, **294** children were granted this status, an increase of 0.8% compared to 2024. In Luhansk region, no children were granted this status.

This may indicate a lack of awareness among residents of Donetsk and Luhansk oblasts of their right to apply to the guardianship authorities of their communities of origin and insufficient communication between local authorities and residents of communities that moved to safer areas of Ukraine during the full-scale Russian armed aggression.

The development of clear mechanisms for the protection of children's rights (in particular, in the context of the legal regime of martial law/emergency, and other crisis situations) should ensure a more prompt response from all public authorities in regions where there is a threat of hostilities.

3. Protection of the rights of victims of armed aggression

Due to Russia's full-scale aggression against Ukraine, most people in the region were forced to leave their homes and seek safe haven. The key issues faced by residents of Donetsk region include: constant threats to life and health; destruction of housing infrastructure; difficulties in obtaining permanent housing after evacuation and compensation for destroyed housing; limited employment opportunities and loss of stable sources of income; difficulties in accessing medical, educational and social services; the need to restore documents and social benefits; and psychological stress caused by traumatic experiences.

According to the Donetsk regional military administration, as of the end of 2025, **192,700** people actually lived in Donetsk region. Of these, **44.3 thousand** are internally displaced persons from the occupied areas of Donetsk region. At the same time, in 2025, **132.7 thousand** people were evacuated from the territory of Donetsk region.

In 2025, the Ombudsperson's Office conducted six monitoring visits to the ICC, transit centres and evacuation centres in Donetsk region. The visits revealed a number of problematic issues. In particular, cases of refusal of some residents to leave the dangerous

areas, primarily the elderly, have been recorded. There are also cases of evacuees returning to settlements threatened by hostilities or occupation. This is due to insufficient integration of IDPs in host communities, difficult social and living conditions, and is also motivated by the availability of their own housing and the possibility of receiving assistance at their previous place of residence. The above highlights the importance of providing timely, accessible and understandable information to the population about evacuation opportunities, guarantees of state support and mechanisms for protecting human rights during displacement.

At the beginning of 2025, **there were 3** ICCs operating in Donetsk region. As of December 2025, there were no such places left due to the destruction of the premises due to the approach of hostilities to the settlements where these ICCs were located.

In August 2025, the ICC in Zoloty Kolodyazh was under the temporary control of the Russian Federation. Currently, the settlement has been liberated and is under the control of the Ukrainian Defence Forces, but the ICC has not resumed its work and is currently not functioning. The ICC in Bilytske was completely destroyed as a result of combined shelling by the Russian Federation. The ICC in Druzhkivka is closed due to its close proximity to the frontline and the announcement of a forced evacuation.

In 2025, monitoring visits were conducted to three ICCs operating in the settlements: Druzhkivka, Bilytske and Zoloty Kolodyazh. The monitoring identified systemic risks to the life and health of residents of temporary accommodation due to the deteriorating security situation. In order to ensure the rights of people to safe living conditions, the Ombudsman sent official letters to the Donetsk Regional Military Administration with recommendations: to take urgent measures to evacuate the TAC residents to safer regions of Ukraine.

These recommendations were implemented. The military administrations of the relevant localities in Donetsk Oblast organised the evacuation of the ICC residents to safer regions of Ukraine.

Due to the timely response of the authorities to the Ombudsman's recommendations, the casualties among the TAC residents were avoided and their right to safety and proper living conditions was ensured.

As of September 2025, there were **3** transit centres for the reception of internally displaced persons in Donetsk region. In general, the process of evacuating civilians is well organised. At the same time, there is a general problem of insufficient communication and interaction between the structural units of the regional military administrations and between the military administrations of neighbouring regions. In particular, between the Donetsk, Dnipro and Kharkiv regional military administrations. This creates a lack of awareness among internally displaced persons on issues related to logistics, places of further accommodation and other social and welfare issues.

In September 2025, the staff of the Ombudsman's Office in Donetsk and Luhansk regions conducted 3 monitoring visits aimed at identifying problematic

issues that internally displaced persons face upon arrival at transit centres. A systemic shortcoming at all the transit centres visited is the low level of communication and interaction between the structural units involved in evacuation. In some cases, there was a lack of equipment to meet the sanitary needs of IDPs. Based on the results of the above inspections, a letter with recommendations aimed at eliminating the identified shortcomings was sent to the management of Donetsk CMA.

In order to eliminate the identified shortcomings and coordinate the joint work of intermediate (collective) evacuation points and transit evacuation centres, working meetings were held between representatives of transit evacuation centres and representatives of intermediate evacuation points.

In addition, according to the Donetsk CMA, to ensure proper conditions for the temporary stay of citizens in transit centres, water heating boilers, washing machines and showers were received in cooperation with the international humanitarian organisation UNICEF.

In September 2025, the Ombudsman's mobile public reception office started operating in the transit centres for civilian evacuation. Eight official visits were made to the transit centres in Pavlohrad, Dnipro region, and Lozova, Kharkiv region, during which 132 citizens were received, and clarifications were provided on the procedure for restoring lost documents; issuing IDP certificates and social benefits; receiving housing allowances; and accessing medical and social services at the new place of residence. Citizens were also informed about benefits and special conditions for admission to educational institutions for IDPs and persons who have left the temporarily occupied territories, the possibility of remote admission and obtaining educational documents, etc. In addition to consultations, the staff of the regional office coordinated citizens' appeals with social protection bodies, SMS units, educational institutions, humanitarian organisations and local authorities to promptly resolve individual issues of evacuees and prevent violations of their rights.

According to the Donetsk CMA, in 2025, as a result of the armed aggression of the Russian Federation, **18,527** residential buildings were damaged/destroyed, including 1,103 apartment buildings and 17,424 private residential buildings. During the year, the Ombudsperson's Office received **126** appeals from residents of Donetsk region with complaints about violations of their right to compensation for damaged or destroyed property as a result of hostilities caused by the armed aggression of the Russian Federation. Out of this number, **121** appeals were received after the adoption of the Resolution of the Cabinet of Ministers of Ukraine of 07.07.2025 No. 815 "Some issues of remote inspection of destroyed certain categories of real estate located in the territories of possible hostilities for which the date of termination of the possibility of hostilities has not been determined, territories of active hostilities, territories of active hostilities where state electronic information resources operate, for which the date of termination of hostilities has not been determined".

In most cases, citizens reported problems with recording the fact of housing destruction. These problems were related, in particular, to the lack of adequate technical

capabilities of village, town and city military administrations in Donetsk region. In addition, different approaches of the commissions for the inspection of damaged and destroyed real estate objects of territorial communities to the application of the provisions of the above-mentioned resolution on the sufficiency of evidence of destruction were recorded.

Some citizens' appeals concerned the unresolved issue of determining the priority or sequence of inspections of destroyed property in the areas where hostilities are taking place, which creates legal uncertainty in the procedure for recording damage and destruction of housing and may create preconditions for abuse by the commissions.

The Ombudsman was approached by a citizen B., whose house was completely destroyed as a result of hostilities in Donetsk region. The applicant reported that despite submitting applications for compensation and confirming the fact of housing destruction, the decision to grant compensation has not been made for a long time, and the application in the Diya application is in the "suspended" state.

In order to restore the violated rights of the citizen, the Commissioner sent a request to the local authorities to find out the status of consideration of the application of citizen B., the reasons for the long pendency of the documents and the need to speed up the consideration of the application. According to the information received from the local authorities, it was established that the consideration of the application was "suspended" due to difficulties with conducting a remote inspection of the destroyed housing, which was necessary to confirm the fact of destruction and determine the amount of compensation.

As a result of the Ombudsman's response, the application of citizen B. was considered. The applicant's destroyed dwelling was included in the list of objects to be inspected in the near future in order to establish the degree of destruction and determine the amount of compensation.

The issue of ensuring the rights of persons affected by military aggression, in particular IDPs, in the Donetsk region remains extremely relevant given the ongoing hostilities, the complexity of evacuation measures, the impossibility of deploying IDP accommodation within the region, and the presence of a large number of risks to the life and health of the civilian population.

As for the status of implementation of recommendations in 2025 in the area of victims of armed aggression in Donetsk region, out of **13** recommendations provided to military administrations: **8** recommendations have been implemented, **2** recommendations are in the process of implementation, and **3** have lost relevance due to the advance of Russian occupation forces.

4. Protection of social and economic rights

The armed aggression of the Russian Federation against Ukraine continues to have a systemic negative impact on the observance of social and economic rights of residents of Donetsk and Luhansk regions. Ongoing hostilities, temporary occupation of certain

territories, destruction of critical infrastructure, housing and businesses have led to a significant deterioration in living conditions, restricted access to social services and sources of income.

In 2025, the Ombudsman received **457** complaints from residents of Donetsk and Luhansk oblasts about violations of social and economic rights. In particular, applicants reported delays in the appointment and payment of pensions, problems with confirming insurance record and receiving payments due to the loss of documents left in the temporarily occupied territories or in the areas of hostilities, problems with the provision of social services by relocated healthcare facilities, etc. The most vulnerable are the elderly, people with disabilities, large families and single parents.

In April 2025, an internally displaced person from the TOT of Luhansk region filed a complaint with the Ombudsman about violation of the right to a pension. Citizen K applied to the Main Department of the Pension Fund of Ukraine in Luhansk region for an old-age pension, but she was denied. The negative decision was based on the fact that part of her work experience was not confirmed. Some of the necessary documents remained in the temporarily occupied territory where she used to work, and it was impossible to obtain archival certificates because the archives were left in the TOT. As a result, the officially confirmed length of service was less than the required length of service for a pension.

In view of this, the Ombudsman sent a letter to the Pension Fund of Ukraine in Luhansk region with a request to re-examine the information provided and the available documents on the applicant's work history. The Pension Fund of Ukraine conducted an additional review of the information on the employment of citizen K. Having reviewed the information provided by the applicant, including available copies of documents, entries in the employment record book, certificates and other evidence that had not been properly taken into account before, part of the length of service was confirmed, which made it possible to establish the required length of insurance period for the granting of a pension.

Thus, the Applicant's right to receive and continue to receive pension benefits was restored.

Despite the measures taken by the state to calculate and pay pensions and social benefits, residents of the region face delays, denials or limited access to the relevant services. The problem is especially acute for people living in the temporarily occupied territories and in the areas of active hostilities, where social protection agencies do not operate or work remotely.

In the area of the right to work, violations related to non-payment or late payment of wages; illegal dismissals and transfers of employees due to martial law were recorded in 2025.

The Ombudsman was approached by the staff of a municipal institution regarding violations of labour rights and psychological pressure. In the appeal, the applicants reported an unjustified reduction in wages, and employees were threatened with possible closure of the institution and staff reductions. In order to verify the facts stated in the appeal, the representative of the Ombudsman in Donetsk and Luhansk regions sent an official request to the regional military administration.

As a result of the Ombudsman's response, the violated labour rights of the complainants were partially restored, in particular, unjustified decisions to reduce their remuneration were eliminated. Measures to fully restore the applicants' rights continue to be taken, including sending response letters to the State Bureau of Investigation and the Eastern Interregional Department of the State Labour Service of Ukraine.

Obstacles to the exercise of the right of citizens to accessible and continuous medical care, especially for internally displaced persons, have also been recorded. The lack of proper information for the population on the organisation of the work of relocated healthcare facilities indicates that healthcare authorities do not properly perform their functions in the context of displacement or termination of medical institutions.

In April 2025, the regional office monitored the Primary Health Care Centre of the Stanychno-Luhanska settlement territorial community relocated to Kyiv. During the monitoring visit to the healthcare facility at the address published on the community website, it was found that there were no employees of and no information on their relocation. Contact phone numbers or other means of communication through which patients could receive up-to-date information on further medical care were not publicly available.

Upon arrival at the address indicated in the letter received upon request, the Primary Health Care Centre was not found at the CNE. The inspection found that obtaining information on the location and working hours of the Primary Health Care Centre is difficult, which restricts the rights of citizens to receive free medical care under martial law.

In order to eliminate the identified violations, the Ombudsman's representative sent a letter to the Luhansk Regional Military Administration on the need to ensure proper information of the population about the procedure for receiving primary healthcare and the current contact details of the institution.

By the end of 2025, based on the results of the analysis of the institution's functioning and taking into account the objective impossibility of ensuring its proper operation and accessibility of primary healthcare for the community, the city military administration decided to terminate the activities of the CNP. This decision is aimed at streamlining the network of healthcare facilities and ensuring that the population is properly informed about the actual possibilities of receiving primary healthcare.

The analysis of the state of socio-economic rights of citizens of Donetsk and Luhansk regions shows that some of the problems are systemic and are exacerbated by the war, temporary occupation and economic difficulties.

5. Protection of citizens' information rights

The issue of violations of information rights by state authorities, local governments, institutions and organisations under martial law remains relevant. Typical violations include unlawful restrictions on access to information, failure to respond to requests for information, and failure to publish or partially publish public information on the official websites of regional, city, town and village military administrations in Donetsk and Luhansk regions.

In 2025, the regional office of the Commissioner in Donetsk and Luhansk regions conducted 3 on-site inspections of websites of local self-government bodies and state authorities for compliance with the legislation on citizens' information rights.

The checks revealed that the following violations had become systemic in Donetsk and Luhansk oblasts

- partial or complete absence of information required to be made public;
- lack of reporting on websites on the satisfaction of requests for information;
- absence of legal acts regulating the activities of the relevant authorities, including decisions, orders of heads, regulations on structural units and work regulations.

A number of violations were identified during the remote monitoring of the website of the Novoaider settlement military administration. In particular, the failure to publish public information in the form of open data on the Unified State Open Data Web Portal, incomplete publication of draft decisions, resolutions, protocols and other documents required for publication.

Based on the results of the monitoring, a report with recommendations was drawn up and sent to the Head of the Novoaider Military Settlement Administration to eliminate the violations. As a result of the response act, the Novoaider settlement military administration worked to streamline and update the information on the official website, taking into account the comments on the content.

One of the key problems in exercising the right to access public information is the consequences of the armed aggression of the Russian Federation against Ukraine, in particular the temporary occupation of certain territories and active hostilities. In this regard, information administrators often report that they are unable to provide the requested documents, that they have been destroyed or are in the combat zone.

Citizen A. appealed to the Commissioner with a complaint about violation of her right to access public information by a local authority. The applicant asked to provide copies of documents related to the activities of the relevant authority. In response to the request, the information manager informed about the impossibility of providing the requested documents, referring to the fact that they were located in the territory of active hostilities and there was no access to archival materials.

As a result of the Commissioner's representative's response, it was established that the information administrator did not provide proper justification for the impossibility of obtaining access to the documents and did not inform the Applicant about alternative ways of obtaining information or the possibility of providing it after access to the relevant materials was restored.

Following the response of the Commissioner's representative, the information administrator provided the Applicant with explanations and alternative methods of obtaining the requested documents.

Thus, such circumstances do not relieve information administrators from the obligation to act in the manner prescribed by law, in particular, to provide applicants with proper explanations of the reasons for failure to provide information, possible ways to obtain it in the future or alternative sources of access.

Regarding the status of implementation of recommendations provided to regional city, town and village administrations of Donetsk and Luhansk regions in 2025 in the area of ensuring the right to access public information, in the specified period, 9 recommendations were provided, which were fully implemented. The implementation of these recommendations ensured the elimination of the identified violations and compliance with the requirements of the legislation in the field of access to public information.

RECOMMENDATIONS:

Donetsk regional state administration, regional military administration:

approve and implement an interagency algorithm for organising the evacuation of civilians in Donetsk region, covering all stages: from the moment of receipt of an evacuation request, organisation of notification and collection of persons, their transportation, escort, registration and transfer to the host party to placement in places of temporary stay in safe regions, with the identification of responsible entities at each stage;

to provide for informing the services for children in the host regions about families with evacuated children in order to further support them, ensure timely granting of the status of persons in difficult life circumstances to evacuated children and monitoring their stay;

in the first half of 2026, in order to develop unified approaches to the evacuation of children from the areas of hostilities, improve coordination and interaction, and identify problematic issues for further resolution, hold an extended protocol meeting with

the leadership of communities, cities and districts of Donetsk region on the issue of ensuring the inalienable rights of the child through evacuation from the areas of hostilities, including through forced evacuation;

to provide local executive authorities of territorial communities, within their powers, with practical, methodological and advisory assistance in resolving issues related to obtaining the status of a child affected by hostilities and armed conflicts. In the first half of 2026, hold a protocol meeting on this issue and submit the minutes of the meeting to the Commissioner.

Luhansk regional state administration, regional military administration:

To conduct a comprehensive analysis of the state of functioning of municipal institutions established or subordinated to the local military administrations of the region, including educational, healthcare and other institutions providing socially important services, in terms of their actual performance, objective ability to perform their functions and ensure the availability of relevant services to the population. To provide the results of the analysis to the Commissioner;

to provide local executive authorities of territorial communities, within their powers, with practical, methodological and advisory assistance in resolving issues related to obtaining the status of a child affected by hostilities and armed conflicts. In the first half of 2026, hold a protocol meeting on this issue and submit the minutes of the meeting to the Commissioner.

City, town and village military administrations of Donetsk and Luhansk regions:

Ensure that the population is informed about the possibility of obtaining the status of a child affected by hostilities and armed conflicts by applying to the guardianship and custody authorities of the community of origin. Use existing websites of military administrations, as well as regional media to inform the public.

11.6. Zhytomyr Region

Between 01 January 2025 and 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **4,070** appeals from Zhytomyr region, containing **4,777** reports of human and civil rights violations. The categories of the most frequently violated rights included: civil rights - **3,325** reports; social rights - **386** reports; economic rights - **206** reports; and children's rights - **131** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	873	2 451	3 393	4 070
Reports of violations of rights	1 160	3 111	3 895	4 777

The geographical location of the Zhytomyr region, in particular its border character and close proximity to the state border with the Republic of Belarus, creates additional security and humanitarian challenges in the context of the armed aggression of the Russian Federation against Ukraine.

The Zhytomyr region as a whole is of great strategic importance for Ukraine's defence, as military units and military infrastructure are located on its territory.

In the first months of the full-scale invasion, the territory of Zhytomyr region was subjected to missile and air strikes on civilian and critical infrastructure, which led to the destruction of residential buildings, energy facilities, social infrastructure and the occupation of several communities. Among them: Narodytska village community, Ovruch city community, Hladkovytska and Slovechanska village communities. The following territorial communities suffered from military aggression during the full-scale invasion: Zhytomyr, Korosten, Zvyagel, Berdychiv, Narodytska, Malynska and others. These include residential buildings, pre-schools, schools, medical facilities, energy infrastructure, railway lines, and local infrastructure.

The region remains in a high-risk area, as the border areas and strategic facilities continue to be subject to missile attacks by the Russian Federation.

At the same time, Zhytomyr region has become an important region for receiving internally displaced persons from areas where active hostilities are ongoing, which places additional strain on the social protection, healthcare, education and housing systems. As of December 2025, **51,873** internally displaced persons were registered in the region, including 12,559 children under the age of 18; 360 large families; 2,846 people with disabilities; 9,596 pensioners; 20,725 people of working age.

In addition, the Zhytomyr region performs an important humanitarian function by receiving evacuation trains from the affected regions and providing primary care, temporary accommodation and further coordination of support for evacuees. In 2025, the Zhytomyr region received seven evacuation trains, which came mainly from the frontline and dangerous regions of Ukraine, in particular from Donetsk and Dnipro regions.

The region also has 6 penitentiary institutions (correctional colonies, penal institutions and pre-trial detention centres), which accounts for about 5.3% of all penitentiary institutions in Ukraine.

The specifics of the region require increased attention to the observance and protection of human rights in the area of social protection of military personnel, war veterans and their families, as well as to guaranteeing the economic rights of citizens employed in strategic industries.

In these special conditions, the activities of the Ombudsman's Office in Zhytomyr region were aimed at exercising parliamentary control over the observance of constitutional rights and freedoms of man and citizen, responding to violations of rights, in particular, the rights of the child, internally displaced persons, human rights in places of detention, rights to security, accessibility and proper condition of civil protection facilities under martial law.

Based on the results of monitoring visits and inspections carried out by the Ombudsman's Office in Zhytomyr region in 2025, the Ukrainian Parliament Commissioner for Human Rights issued **13** acts of the Commissioner's response, including **9** submissions of the Commissioner and **4** orders of the Commissioner to eliminate violations of the legislation on personal data protection revealed during the inspection.

As part of the Commissioner's response to the results of monitoring visits, disciplinary action was taken: 2 officials of the Police Department No. 2 of the Zhytomyr District Police Department of the Main Department of the National Police in Zhytomyr Oblast, 7 officials of the Korosten District Police Department of the Main Department of the National Police in Zhytomyr Oblast, 1 employee of the Zhytomyr Special School No. 2 of the Zhytomyr Regional Council, 1 employee of the Regional Centre for Social and Psychological Rehabilitation of Children "Sunny House" of the Zhytomyr Regional Council, 2 officials of the state institution "Raikivska Correctional Colony No. 73".

Monitoring visits/on-site inspections

In 2025, the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Zhytomyr region (hereinafter - the Ombudsman's Office in Zhytomyr region) conducted **139** monitoring visits.

The monitoring visits were carried out in the following areas:

children's rights (**21**); rights of citizens affected by the armed aggression against Ukraine (**28**): of these **24** - rights of internally displaced persons; **4** - rights of access to educational services of persons residing in the temporarily occupied territories; human rights in places of detention (national preventive mechanism) (**25**); information rights (**23**): of which: **19** - inspections of official websites of local self-government bodies of territorial communities of Zhytomyr region on the observance of human and civil rights to appeals and information; **4** - inspections in the field of personal data protection; rights in the judiciary and the right to fair justice (**9**); rights to life and security under martial law (**33**).

A total of **139** monitoring visits conducted by the Ombudsperson's Office in Zhytomyr region in 2025 included

116 - on-site monitoring visits;

23 - on-site inspections.

Educational activities

In order to raise public awareness of the protection of human rights and freedoms, the Ombudsman's Office in Zhytomyr region initiated and conducted **76** educational events in the reporting year. Among them, 1 in the field of personal data protection, 40 in the field of the right to appeal, 2 in the field of access to public information, 15 in the field of children's rights protection, and 18 in the field of protection of the rights of citizens affected by the armed aggression against Ukraine.

In June 2025, the regional educational project "School Ombudsman" was launched at the Ombudsman's Office in Zhytomyr region.

The project involved **20** general secondary education institutions (lyceums) in Zhytomyr. The School Ombudsman project received a positive response in the region and was supported by partners. The implementation of this project contributes to the formation of a legal culture among students and the development of mechanisms for protecting children's rights in educational institutions. In addition, the School Ombudsman project is expected to be expanded to cover territorial communities in Zhytomyr region.

During the reporting year, special attention was paid to work with families of persons missing under special circumstances and prisoners of war.

The Ombudsman's Office in Zhytomyr region organised and held **15** outreach events for families of POWs and missing persons under special circumstances, attended by **2,680** people. Representatives of the state authorities, the Coordination Headquarters for the Treatment of Prisoners of War, law enforcement agencies and other responsible institutions always participate in these meetings.

These events demonstrated the high need for these families to communicate with the state authorities and proved to be an effective tool for responding to current issues.

The main issues addressed by the Ombudsperson's Office were:

- protection of children's rights;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in captivity or missing in action under special circumstances;
- protection of the rights of citizens affected by the armed aggression against Ukraine;
- protection of human rights in places of detention;
- protection of information rights;
- protection of the rights to security, accessibility and proper condition of civil protection facilities under martial law.

1. Protection of children's rights

In 2025, the Ombudsperson's Office in Zhytomyr region conducted **21** monitoring visits to assess the observance of the rights and freedoms of orphans, children deprived of parental care, children in difficult life circumstances, the activities of children's services and guardianship and custody authorities, social service providers and the right to a safe educational environment under martial law.

The monitoring visits of the Ombudsperson's Office in Zhytomyr region covered educational and social protection institutions in 12 territorial communities of Zhytomyr region, including: Berezivska, Vyshevytska, Kmytivska, Teterivska territorial communities of Zhytomyr district; Baranivska, Dovbyska territorial communities of Zvyagelskyi district; Andrushivska, Hryshkivska territorial communities of Berdychiv district; Irshanska territorial community of Korosten district; Chudnivska territorial community of Zhytomyr district, as well as in Zhytomyr territorial community.

These monitoring visits included the following key issues:

- responding to citizens' appeals regarding violations of children's rights (2);
- monitoring visits to assess the observance of the rights to life, safety, decent conditions of education, health care and protection from violence (21);
- assessing the implementation of children's rights to education and safe learning conditions.

The monitoring visits revealed problems that require the attention of state authorities:

- The failure of services that, in accordance with their functional responsibilities, are obliged to respond in a timely manner to cases of threats to children's lives and health. Specifically, the lack of proper preventive outreach to families, formal implementation of individual child social protection plans and insufficient monitoring by children's services of families with children in difficult life circumstances;
- violations of children's rights to grow up in a safe environment.

In October 2025, a tragic incident occurred in Zhytomyr region in a family that had been registered as being in difficult life circumstances since 2023. During a family conflict, a man stabbed his wife and 9-year-old daughter, who died on the spot from their injuries.

The family had five children, three of whom were minor girls aged 15, 11 and 9. The man systematically committed psychological and physical violence against his wife and children, for which he was repeatedly brought to administrative and criminal responsibility.

At the same time, in August 2025, a court decision deprived these parents of their parental rights and ordered the transfer of the children to the guardianship authority for further placement. However, the children's service did not initiate the immediate removal of the children from the family either during the trial or after the decision was made, nor did it take measures to ensure their safety.

Criminal proceedings have been initiated against the officials of the children's service.

This case highlights the critical importance of a timely response by children's services and the need for a systematic approach to risk assessment to prevent similar tragedies in the future.

During 2025, the Ombudsperson's Office in Zhytomyr region systematically monitored the state of observance of children's rights in social protection institutions (1 institution) and educational institutions (18 institutions), which allowed timely detection of violations and taking measures to eliminate them.

During one of these monitoring visits to the Regional Centre for Social and Psychological Rehabilitation of Children "Sunny House" of the Zhytomyr Regional Council, a case of violation of a child's right to Ukrainian citizenship was identified, which required a prompt response from local authorities. Ensuring a child's right to citizenship is one of the basic principles of child protection and an integral element of the exercise of their constitutional rights. Non-compliance with this right can lead to restrictions on access to education, healthcare and social services, and make it difficult for a child to fully participate in public life.

*In March 2025, during a monitoring visit to the Regional Centre for Social and Psychological Rehabilitation of Children "Sunny House" of the Zhytomyr Regional Council, **the** Ombudsperson's Office in Zhytomyr region, among other violations, found a violation of the child's right to Ukrainian citizenship due to the failure to issue a passport.*

At the same time, the visit revealed that the child's personal file did not contain information on the implementation by the Service for Children as representative of the guardianship and custody authority of the necessary measures to restore the child's right to Ukrainian citizenship.

At the time of the discovery of the absence of a passport of a citizen of Ukraine, the child was 14 years old. In addition, an analysis of the child's personal file revealed that the children's service did not even respond to the appeal of the institution where the child was placed.

Based on the results of the monitoring visit, the Ombudsperson sent a relevant submission to the Zhytomyr Regional Council to take urgent measures to respond and prevent violations of children's rights, including the right to Ukrainian citizenship.

The inaction of the Service for Children resulted in a long-term violation of the child's right to Ukrainian citizenship guaranteed by the state.

Following the intervention of the Ombudsperson, the necessary measures were taken to restore the child's right to Ukrainian citizenship and the child received a passport of a citizen of Ukraine in the form of an ID card.

During the reporting period, the Ombudsperson's Office in Zhytomyr region also monitored the observance of children's rights in educational institutions. In particular, they responded to cases of possible violations of children's rights in pre-school education institutions in Zhytomyr (2 cases).

One of these cases was a response to a high-profile event that received wide publicity and required immediate response and verification.

In February 2025, following the publication on social media of a video recording of inappropriate behaviour of a teacher at the preschool educational institution No. 58 in Zhytomyr city towards a child, the Ombudsman's Office in Zhytomyr region immediately conducted a monitoring visit to the institution.

As a result of the monitoring visit, the information about the alleged violation of children's rights was verified, response measures were taken and recommendations were developed to improve the level of children's safety and preventing similar cases in the future.

According to the information provided by the Department of Education of the Zhytomyr City Council, an internal investigation was conducted against the educator. As a result of the investigation, the educator was dismissed from her position due to professional burnout.

The monitoring visits resulted in **191** recommendations, of which: **93** (48.69%) were implemented; **25** (13.09%) were in the process of implementation; **and 73** (38.22%) were not implemented.

2. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in captivity or missing in special circumstances

In 2025, the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Zhytomyr region systematically processed appeals from servicemen, veterans, persons liable for military service and their families. The most common violations that required response were delays in granting combatant status, problems with the calculation of social benefits and the implementation of state guarantees, violations of rights during military medical examinations, and ensuring the rights of families of defenders who are in captivity or missing under special circumstances.

On 01 May 2025, pursuant to the decision of the Council of the Coordination Headquarters on the Treatment of Prisoners of War of 15 April 2025, the Regional Working Group of the Coordination Headquarters on the Treatment of Prisoners of War (hereinafter - RWG POW) in Zhytomyr region started its work on the basis of the Regional Office of the Ombudsman in Zhytomyr region.

Робота РРГ КІШ набула системного характеру завдяки впровадженню щотижневого графіка індивідуальних прийомів та проведенню групових зустрічей із родинами Захисників і Захисниць за участю представників військових частин Національної гвардії України, підрозділів Державної прикордонної служби України, Секретаріату Уповноваженого з питань осіб, зниклих безвісти за особливих обставин, Служби безпеки України в області, Головного управління Національної поліції в Житомирській області, Житомирської обласної військової адміністрації, Житомирського обл

In 2025, under the leadership of the Ombudsman's representative, together with members of the CCWG and with the participation of representatives of the International Committee of the Red Cross in Ukraine, MPs of Ukraine and representatives of the territorial communities of the region, **8** meetings were organised and held with families of prisoners of war and persons missing under special circumstances in Zvyagel, Berdychiv, Irshan, Khoroshiv, Radomyshl, Ovruch, Zhytomyr and Chudniv territorial communities. The events were attended by **2,380** families.

In addition, at the invitation of military units, units of the National Guard of Ukraine and the State Border Guard Service of Ukraine, in 2025, the Ombudsman's representative took part in 7 additional meetings with families of prisoners of war and those who went missing under special circumstances. The meetings were held, in particular, in a mixed format, which allowed for both in-person participation, , and remote participation. In total, **300** families attended the meetings and received explanations on the mechanisms for protecting their rights, available state guarantees and algorithms for interacting with state authorities in matters of search, exchange and social security.

The most common questions asked by families were:

- priority actions in case of missing persons or captivity;
- the procedure for creating and filling in a military's personal account;
- obtaining extracts from the Register of Missing Persons;
- interaction with law enforcement agencies and military units;
- access to information about unidentified bodies;
- conducting portrait examinations;
- procedures for the exchange of prisoners of war and repatriation of bodies;
- assignment and payment of financial support.

In addition, in 2025, the Ombudsperson's Office in Zhytomyr region carried out comprehensive work aimed at ensuring the observance of the rights of female and male veterans, their families and the families of the fallen defenders of Ukraine.

Taking into account the consequences of the full-scale armed aggression of the Russian Federation against Ukraine, the issue of ensuring the rights of female and male veterans and their families remains one of the priorities of the Ombudsperson's Office in Zhytomyr region.

In order to create platforms for open dialogue and develop support mechanisms, two forums were held in Zhytomyr in 2025 at the initiative of the Office of the Ukrainian Parliament Commissioner for Human Rights. In particular, in October 2025, the event "Veteran Resilience. Human Rights: Strength in Unity" was held in October 2025, and the forum "The Power of Recovery" was held in November 2025. These events provided a platform for discussing topical issues of social adaptation of female and male veterans, their interaction with state and local authorities, and the development of joint solutions to eliminate systemic barriers to the realisation of the rights of defenders.

As part of on-site receptions of citizens, the Ombudsperson's Office in Zhytomyr region held individual meetings with residents of territorial communities, which allowed to respond promptly to violations of rights and facilitate their restoration. One of the cases of responding to citizens' appeals during the on-site reception of the Ombudsman's representative in Zhytomyr region was the issue of providing a serviceman with a prosthesis.

In May 2025, during an on-site reception of citizens, the Ombudsman's representative in Zhytomyr region was approached by the mother of a serviceman who had been seriously injured during a combat mission and had been waiting for a prosthesis for more than six months.

In order to restore the violated rights of the serviceman, the Ombudsman's Office in Zhytomyr region immediately took response measures and addressed the Veteran Policy Department of the Zhytomyr Regional Military Administration in writing.

As a result of the interaction, the issue of prosthesis manufacturing and delivery was resolved as soon as possible. The soldier received the necessary prosthesis, which allowed him to restore his right to proper medical care, rehabilitation and further social adaptation.

A separate area of activity of the Ombudsman's Office in Zhytomyr region was ensuring the observance of the rights of persons liable for military service during mobilisation activities.

During the year, citizens of Zhytomyr region received written (2) and oral (5) appeals regarding allegedly illegal actions of employees of territorial recruitment and social support centres, in particular during the verification of military registration documents, as well as regarding the non-admission of defence counsels (lawyers) to the premises of the TSC and SP to ensure the right to defence.

A citizen P. appealed to the Ukrainian Parliament Commissioner for Human Rights with a complaint about unlawful mobilisation without passing a military medical commission.

According to the applicant, the decision to call him up was made without a proper medical examination, despite the presence of health problems. The applicant

stressed that he had not been given the opportunity to undergo a full examination, which caused reasonable fears for his life and health.

The Ombudsman's Office in Zhytomyr region immediately responded to the appeal and, based on the results of the intervention, a second medical examination with the military medical commission was organised.

After a comprehensive assessment of his health, P. was declared medically unfit for military service. Thus, his right to a proper medical examination, objective consideration of his health condition and the legality of the decisions taken were ensured.

Among the factors that created the prerequisites for violations of citizens' rights in 2025 was the order of the Minister of Defence of Ukraine of 03.08.2025 No. 4303/ud.

In September 2025, a regulatory act introduced an experiment to involve military personnel of the Armed Forces of Ukraine in mobilisation notification activities.

The events of conflict situations during mobilisation activities in public places, places of mass gathering, checkpoints (roadblocks), which took place with the participation of military personnel from active military units who had recently participated in hostilities and were not representatives of the TCC and JV, resonated in society,

According to Article 17 of the Constitution of Ukraine, the Armed Forces of Ukraine and other military formations may not be used by anyone to restrict the rights and freedoms of citizens.

However, the experiment was not implemented in Zhytomyr region. The Commissioner responded to the events in the regions and sent a letter to the Minister of Defence of Ukraine. According to the reply received on 20.10.2025, the Ministry of Defence of Ukraine decided to terminate the experiment after analysing the progress of its implementation.

3. Protection of the rights of citizens affected by the armed aggression against Ukraine

The Zhytomyr region continues to be a safe haven for tens of thousands of Ukrainian citizens who were forced to leave their places of permanent residence as a result of the full-scale armed aggression of the Russian Federation against Ukraine.

According to the information provided by the Zhytomyr Regional Military Administration, as of the end of 2025, **51,873** internally displaced persons were registered in the Zhytomyr region, including

12,559 children under the age of 18

360 large families;

2,846 people with disabilities;

9,596 pensioners;

20,725 people of working age, of whom **13,101** are in need of employment.

The majority of IDPs reside in the regional centre and large urban communities, in particular in the cities of Zhytomyr, Zvyagel, Berdychiv and Korosten.

In addition, the Ombudsman's Office in Zhytomyr region, together with other state institutions, ensured the meeting of two evacuation trains from the territories of active hostilities. The evacuees were provided with information and advisory support to prevent violations of their rights.

In 2025, the Ombudsman's Office in Zhytomyr region conducted **28** monitoring visits to ensure the observance of the rights of citizens affected by the armed aggression against Ukraine.

The monitoring visits were carried out to ensure the observance and protection of the rights of

- internally displaced persons (**24**);
- access to educational services for people living in the temporarily occupied territories (**4**).

The main violations of the rights of IDPs in places of temporary residence are: inadequate living conditions; illegal collection of accommodation fees from persons who were forced to move to the territory of Zhytomyr region as a result of armed aggression.

The main problems that IDPs addressed to the Ombudsperson in 2025 were the issues of ensuring proper living conditions and observance of the right to free accommodation in places of temporary residence of IDPs, high cost of rent, limited housing stock for temporary accommodation.

In addition, in March 2025, the Ombudsman's Office in Zhytomyr region conducted monitoring visits to 4 educational centres "Crimea-Ukraine" and "Donbas-Ukraine", which operate on the basis of Zhytomyr Ivan Franko State University, State University "Zhytomyr Polytechnic", Polissia National University, Berdychiv Vocational College of Industry, Economics and Law.

The main purpose of the inspection was to assess the accessibility of educational services for applicants from the temporarily occupied territories, as well as to monitor the implementation of recommendations provided to the institutions in 2024. The educational centres Crimea-Ukraine and Donbas-Ukraine play a key role in ensuring equal access to higher education for young people who, due to military aggression and the temporary occupation of certain territories, are unable to enter Ukrainian educational institutions under the usual procedure. They provide applicants with a simplified admission mechanism without the need to undergo NMT, which is critical to ensuring the right to education in the context of limited access to educational services in the TOT.

In October 2025, as part of its monitoring activities, the Mission visited the IDP MCC, which is located in social dormitories on the balance sheet of the municipal enterprise Komservis of the Andrushivka City Council.

At the time of the visit, 26 IDPs were living in the MCC, including 15 women, 9 men, 2 children under 18 and 4 persons with disabilities: 3 men and 1 child.

During anonymous communication with IDP residents, a systemic problem was identified related to payment for accommodation and utilities. People reported that they had been making payments for a long time without proper explanations of the legal basis for such charges. Some residents could not explain what services they had been paying for for almost three years, which indicated a lack of transparency and proper information on the part of the balance holder.

Following the monitoring visit, a representative of the Ombudsman in Zhytomyr region sent a letter to the Zhytomyr Regional Military Administration informing it of the fact and providing recommendations.

As a result of the measures taken, the rights of 26 IDP residents (13 families) were restored. Namely, they were provided with free accommodation and the unlawfully paid funds totalling over UAH 28,000 were returned.

The overall situation with the rights of IDPs in the TACs in Zhytomyr region requires further improvement. It is still necessary to implement comprehensive measures aimed at improving the quality of living conditions, ensuring access to medical and social services, and creating real employment opportunities for IDPs. Effective coordination between state authorities, local self-government bodies and other stakeholders is an important condition.

In 2025, the Ombudsman's Office in Zhytomyr region not only monitored and responded to systemic problems of IDPs, but also promptly responded to individual appeals of persons in difficult life circumstances and in need of social protection (1 person).

Thanks to the intervention of the Ombudsman's Office in Zhytomyr region, the local self-government body promptly responded to the official letter of the Ombudsman's Office in Zhytomyr region, which further contributed to the restoration of the violated right of a person in difficult life circumstances.

A citizen N., an IDP from the Autonomous Republic of Crimea, a person with a disability of group II, applied to the Ombudsman's Office in Zhytomyr region, reporting his lack of residence and that he was in difficult life circumstances.

In order to protect the applicant's rights, the representative of the Ombudsman in Zhytomyr region sent a letter to the Department of Social Policy of Zhytomyr City Council to consider the possibility of providing him with temporary housing and ensuring proper social support.

In the shortest possible time, the person was registered as an internally displaced person, assigned a living allowance in accordance with the current legislation, provided with financial assistance from the local budget, decided to provide a social service of asylum and provided with a temporary place of residence in a social institution of the city with full social support.

Thus, with the assistance of the Ombudsman's Office in Zhytomyr region, the violated rights of the internally displaced person to social protection and housing were restored.

The monitoring visits resulted in **136** recommendations, of which: **38** (27.9%) were implemented; **56** (41.2%) were in the process of implementation; and **42** (30.9%) were not implemented.

4. Protection of human rights in places of detention

As part of the implementation of the powers of the National Preventive Mechanism (NPM) to prevent torture and other cruel, inhuman or degrading treatment, in 2025, the Ombudsperson's Office in Zhytomyr region conducted 25 monitoring visits to places of detention in the territory of Zhytomyr region.

Of these, 6 were monitoring visits to the territorial units of the National Police.

Particular attention during the monitoring of the territorial units of the National Police was paid to the observance of basic guarantees of the rights of detainees, as defined by the standards of the European Committee for the Prevention of Torture (CPT).

However, despite the recommendations of the European Committee for the Prevention of Torture and the requirements of the criminal procedure legislation, during its visits in 2025, the NPM team in Zhytomyr region recorded cases of absence of

- appointed officials responsible for the stay and ensuring the observance of the rights of detainees, which leads to violations of the fundamental rights of detainees;
- rooms for detainees or the termination of their functioning due to non-compliance with international standards;
- rooms for conducting investigative actions, as a result of which procedural actions with detainees were carried out in the offices of police officers and rooms for receiving citizens without proper video recording of such actions;
- rooms for conducting investigative actions and rooms for confidential meetings of detainees with defence counsels.

During the visit to the Police Station No. 2 of the Zhytomyr District Police Department No. 2 of the Main Department of the National Police in Zhytomyr Region and the Korosten District Police Department of the Main Department of the National Police in Zhytomyr Region, it was established that no officials responsible for the stay and observance of the rights of detainees in the police station had been appointed.

As a result, no accounting and records of all actions carried out with the involvement of detainees were kept, and other duties provided for in Article 212 of the Criminal Procedure Code of Ukraine were not fulfilled.

The Ombudsman sent relevant submissions to the National Police of Ukraine to take urgent measures to prevent violations of the rights of detainees.

As a result of internal investigations initiated by the National Police of Ukraine, disciplinary measures were taken against police officers and individuals were brought to justice for improper compliance with Article 212 of the Criminal Procedure Code of Ukraine.

According to the National Police of Ukraine, officials responsible for the stay and enforcement of the rights of detainees have been appointed.

In addition, in 2025, the following systemic violations were recorded in the territorial units of the National Police in Zhytomyr region

- lack of first aid training certificates among the personnel of the territorial units of the National Police;

- non-compliance of the condition and arrangement of civil protection facilities with the requirements for the maintenance and operation of civil protection facilities;
- the premises of the territorial units of the National Police are inaccessible to persons with disabilities and other low-mobility groups;
- ensure the storage and placement of fire extinguishers in territorial police units in accordance with the requirements of the law.

Under martial law, the Ombudsman's Office in Zhytomyr region paid special attention to the compliance of the territorial units of the National Police with the requirements of the Law of Ukraine "On the National Police" and the requirements of the Procedure for training and advanced training of persons obliged to provide medical care, approved by the Cabinet of Ministers of Ukraine on 21.11.2012 No. 1115, including in terms of the right to health care.

Despite the fact that the police, in accordance with its tasks, takes all possible measures to provide emergency, including first aid and medical, assistance to persons affected by criminal or administrative offences, accidents, as well as to persons in a situation dangerous to their life or health, the Commissioner's Office in 2025 recorded facts of the lack of first aid training certificates among the personnel in 6 territorial units of the National Police.

The Ombudsman sent a relevant submission to the National Police of Ukraine to take urgent measures to respond and prevent these violations.

According to the National Police of Ukraine, the personnel of 6 territorial units of the National Police underwent training and advanced training in knowledge and practical skills of providing first aid and received certificates of training in providing first aid.

In August 2025, the Commissioner's Office in Zhytomyr region during a monitoring visit to the Police Department No. 2 (Radomyshl) of the Zhytomyr District Police Department No. 2 of the Main Department of the National Police in Zhytomyr region found violations of the Requirements for the maintenance and operation of civil protection facilities approved by the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018, namely: the premises of the civil protection facility were locked with a padlock.

Also, in violation of these Requirements, the management of Police Station No. 2 failed to take measures to equip the civil protection facility with a minimum number of seats, provide medical supplies (first aid kits), and stock up on drinking water, food, and technical water.

The Ombudsman sent a relevant submission to the National Police of Ukraine to take urgent response measures and prevent the above violations.

According to the National Police of Ukraine, following the results of internal investigations initiated by the National Police of Ukraine, disciplinary measures were taken against police officers and individuals were brought to justice. The

violations mentioned in the report were eliminated and the recommendations were implemented.

In addition, a serious problem remains the difficulty of access to doctors for prisoners in penal institutions. This significantly worsens their condition and can lead to complications, especially in cases where a delay in the provision of medical care can have critical consequences.

The CPT stresses that medical services in places of detention should be able to provide medical care and treatment, as well as appropriate diet, physiotherapy, rehabilitation or any other special care, to the same standard as that offered to patients in civilian medical facilities.

The lack of proper and objective documentation of prisoners' injuries significantly complicates both the prevention of violence and effective investigations. In 2025, the Ombudsperson's Office in Zhytomyr region recorded 1 such case during a monitoring visit to the state institution Raikivska Correctional Colony No. 73. This also undermines confidence in the penitentiary system and creates an atmosphere of impunity for those who commit violence against persons in penitentiary institutions.

In February 2025, the Ombudsperson's Office in Zhytomyr region conducted a monitoring visit to the state institution Raikivska Correctional Colony No. 73 (hereinafter - the institution).

During the visit, the NPM group revealed a case of inadequate response by the administration of the institution to the injury of a convict. The administration of the institution did not report this incident to the prosecutor's office.

Thus, on 25.09.2023, convict R. sustained an injury - a fracture of the femoral neck. At the time of the visit, the convict was in the medical unit and had limited mobility.

During the examination of the materials of the personal file of convict R., the NPM group found that the administration of the institution did not conduct an internal investigation into the incident, which is a violation of paragraph 2 of section II of the Procedure for conducting internal investigations in the State Criminal Executive Service of Ukraine, approved by the order of the Ministry of Justice of Ukraine of 12.03.2015 No. 356/5, due to the fact that this event could cause a public outcry. The rehabilitation plan for convict R. was not drawn up. No documents were sent to the commission for determining the state of incapacity for work.

At the same time, the materials of the personal file of convict R. revealed that in February 2024, the convict was transferred to the state institution "Zhytomyr Penitentiary No. 8" without any medical support in violation of Rule 39 of the European Prison Rules (no documentation), the personal file of convict R. contains a report and a doctor's opinion who conducted an examination outside the institution and stated that the convict was injured and that he was unable to move independently.

At the time of the visit, the convict R. was in the medical unit of the institution due to the loss of his ability to work. As of February 2025, neither the medical staff

nor the management of the institution had issued medical documents for the commission in accordance with the Regulations on Expert Teams for Assessment of the Daily Functioning of a Person, approved by the Resolution of the Cabinet of Ministers of Ukraine of 15 November 2024 No. 1338 on disability, which deprived convict R. of the right to social guarantees and pension benefits.

During the confidential communication with the convicts, some of them stated that upon arrival at the institution, the doctor did not examine them, but immediately assigned them to the departments of the social and psychological service.

In addition, a number of other violations were found in the institution, in particular

the premises of the quarantine, diagnostics and distribution unit are not equipped with a 15-litre drinking water tank with a tap, lid, mug and basin, so the convicts are forced to use water from the centralised water supply system;

the conditions of detention of the convicts in the cells of the disciplinary isolator of the institution do not meet the established standards, as due to the excessive barred windows in some cells there is not enough daylight;

insufficient temperature conditions (there is no heating in the dining room and in some rooms of the food unit);

non-compliance with hygienic conditions, in particular, worn-out crockery with persistent dirt residues due to prolonged use was used in the dining room. The premises for cooking were in an unsanitary condition, and there was no water supply in the canteen;

the facts of labour exploitation, namely, the use of labour by the convicts for more than 40 hours a week;

the institution did not have a civil protection facility to protect the convicts during the special period;

violation of the fire safety rules, in particular, the sockets used by the convicts are in unsatisfactory technical condition, the electrical wiring is not properly insulated;

violation of the rights of persons with disabilities, in particular, the basic conditions for unimpeded movement in the institution are not created. These persons live in different departments of the social and psychological service, some of them move around with the help of wheelchairs, others use crutches or support sticks. One convict who uses a wheelchair is constantly in the medical unit located on the second floor of the building. The lack of necessary accessibility facilities, such as a lift or elevator, makes it impossible for this convict to move independently due to the non-compliance of the medical unit premises with the requirements of paragraph 3.36 of the State Building Standards B.2.2-40:2018 "Buildings and structures" "Inclusiveness of buildings and structures" (hereinafter - SBS B.2.2-40:2018); the sanitary facilities are not equipped for the needs of people with reduced mobility;

involvement of the institution's employees in duty according to the schedule - one day in two days;

the right of convicts to appeal to the Ukrainian Parliament Commissioner for Human Rights is not ensured.

Based on the results of the monitoring visit to the institution, the Ombudsman sent a relevant submission to the Ministry of Justice of Ukraine to take urgent measures to respond and prevent the above violations.

According to the information provided by the Ministry of Justice of Ukraine, an internal investigation was conducted into the rank and file and senior staff of the institution and measures were taken to eliminate the identified violations of the rights of prisoners.

Based on the results of the internal investigation into the fact that convict R. was injured, the administration of the institution informed the prosecutor's office and the Berdychiv District Police Department of the Main Department of the National Police in Zhytomyr Region.

The Ministry of Justice of Ukraine also informed that all newly arrived convicts are sent to the quarantine, diagnostic and distribution unit for fourteen days, where they undergo a medical examination within the first few days to identify infectious, somatic and mental diseases. After the examinations, they undergo a preventive medical examination before being placed in the social and psychological service units.

According to the information of the state institution "Health Care Centre of the State Criminal Executive Service of Ukraine", the medical unit takes measures to send the medical documentation concerning convict R. to the expert teams for assessing the daily functioning of a person to consider the issue of establishing a disability group or disability.

The monitoring visits resulted in **188** recommendations, of which: **127** were implemented; **26** were in the process of implementation; **35** were not implemented.

5. Protection of information rights

In the field of information rights protection, the Commissioner's Office in Zhytomyr region conducted **23** on-site inspections in 2025, which concerned the right of access to public information and personal data protection.

Ensuring the right of access to public information is one of the key activities of the Commissioner's Office in Zhytomyr region.

In accordance with the Law of Ukraine "On Access to Public Information", public authorities and local self-government bodies are obliged to ensure openness of their activities, timely and fully publish public information, and properly consider requests for information from citizens.

During 2025, the Commissioner's Office in Zhytomyr region identified cases of violations of the Law, including failure to respond to requests for information, providing responses in violation of the statutory deadlines, and improper publication of public information on the official websites of local governments (in 19 local governments of Korosten district of Zhytomyr region).

In addition, the Ombudsman's Office in Zhytomyr region monitors compliance with the rights of citizens to appeal provided for by the Law of Ukraine "On Citizens'

Appeals" by state and local authorities. In 2025, violations of the legislation in the field of consideration of citizens' appeals were identified, in particular, in relation to their untimely consideration, failure to provide answers or incomplete and formal answers. Such violations limit the constitutional right of citizens to effectively protect their interests and receive proper information from the authorities.

Based on the results of parliamentary control over the observance of the human right to access to information, as well as over the observance of legislation on citizens' appeals, 59 citizens' rights were restored in 2025.

In order to assess compliance with the legislation on **access to public information and the exercise of citizens' right to appeal**, the Representative Office conducted 19 on-site inspections of the official websites of local self-government bodies of territorial communities in Zhytomyr region in 2025 on the observance of human and civil rights to appeal and information.

The inspections revealed systemic violations that make it difficult or impossible for citizens to exercise their rights, namely

lack or incompleteness of information on financial resources, budgets and their implementation (in 4 local self-government bodies);

failure to publish general rules of work of local self-government bodies (in 2 local self-government bodies);

Lack of reports on consideration and processing of requests for information and citizens' appeals (in 2 local self-government bodies);

Lack of procedure for drafting, submitting a request for information, appealing against decisions of information holders, actions or inaction (in 1 local self-government body);

Lack of contact details (phone numbers, email addresses), schedules of personal reception of citizens (in 7 local self-government bodies);

lack of functioning hotlines and electronic forms for submitting citizens' appeals (in 2 local self-government bodies).

These shortcomings indicate the existence of systemic violations of the Law of Ukraine "On Access to Public Information" and the Law of Ukraine "On Citizens' Appeals", which limits the constitutional rights of citizens to effective access to public information and to receive timely and appropriate responses from public authorities and local self-government bodies.

In 2025, the Ombudsman's Office in Zhytomyr Oblast conducted an on-site inspection of the website of a city territorial community in Zhytomyr Oblast. The reason for the inspection was an appeal from a citizen who tried to obtain public information from the official website of the city council and to get acquainted with the draft decisions of the city council in a timely manner before their consideration and adoption. However, he was unable to exercise his right to access public information.

Based on the results of the audit, the Commissioner's Office in Zhytomyr Oblast found that the information manager, contrary to the requirements of the Law of Ukraine "On Access to Public Information", failed to fulfil its obligation and failed

to publish information of public interest. The Commissioner's Office in Zhytomyr Oblast sent a report to the subject of the inspection to eliminate the violations.

The City Council informed the Office of the Commissioner in Zhytomyr Oblast about the implementation of the audit recommendations and the results of the internal investigation.

Personal data protection is one of the most sensitive areas in the field of human rights in the context of digitalisation of public administration. Proper implementation of the requirements of the Law of Ukraine "On Personal Data Protection" is the responsibility of all public authorities and local self-government bodies.

In 2025, the Commissioner's Office in Zhytomyr region conducted **4** on-site inspections of compliance with the legislation on **personal data protection**.

As a result of these inspections, the Commissioner issued 4 instructions, which indicates that none of the subjects of the inspection ensured full and proper compliance with the requirements of the Law of Ukraine "On Personal Data Protection" and regulations adopted in accordance with this law.

Such violations include

- the audited entity does not have a regulatory document that defines the general requirements for the processing and protection of personal data of personal data subjects, respectively, does not define the purpose and grounds for processing personal data, the categories of subjects and the composition of personal data to be processed;
- the subject of the inspection has not identified a responsible person who organises work related to the processing and protection of personal data;
- the personal data subject is not informed about the processing of personal data;
- the audited entity has not determined the procedure for employees' access to personal data;
- the subject of the audit has not ensured the maintenance of records of employees who have access to personal data;
- the audited entity has not differentiated between employees' access to personal data;
- the subject of the audit does not keep records of operations related to the processing of personal data;
- the audited entity has not determined the procedure for destruction/deletion of personal data whose storage period has expired;
- the audited entity does not have an Action Plan in case of unauthorised access to personal data, damage to technical equipment, or emergencies;
- failure to notify the Ukrainian Parliament Commissioner for Human Rights of data processing that poses a particular risk to the rights and freedoms of personal data subjects.

In December 2025, the Office of the Commissioner in Zhytomyr region conducted an audit of compliance with the requirements of the legislation on

personal data protection in the activities of one of the local self-government bodies of the region.

The audit revealed a complete absence of internal organisational and administrative documents regulating the procedure for processing and protecting personal data, as well as numerous violations of the Law of Ukraine "On Personal Data Protection" and the Model Procedure for Processing Personal Data, approved by the Order of the Ukrainian Parliament Commissioner for Human Rights No. 1/02-14 dated 08.01.2014.

In particular, it was found that there was no definition of the purpose, grounds and composition of personal data; no responsible person for organising work on personal data protection; failure to notify personal data subjects of processing; no procedure for employees' access to personal data and registration of such persons; no procedures for destroying or deleting personal data after the expiration of their storage period; no action plan in case of unauthorised access or emergency situations.

Based on the results of the inspection, the Commissioner's Office in Zhytomyr Oblast issued an order to the subject of the inspection to eliminate the identified violations. Subsequently, the audited entity took the necessary response measures and eliminated the violations.

Based on the results of on-site inspections, **103** recommendations were made, of which: **76** were implemented; **16** were in the process of implementation; **11** were not implemented.

6. Protection of the rights to security, accessibility and proper condition of civil protection facilities under martial law

In 2025, the Ombudsman's Office in Zhytomyr region carried out systematic monitoring of civil protection facilities in the region and the city of Zhytomyr.

In order to assess the actual state of readiness of civil protection facilities for their intended use, check the actual accessibility of protective structures for the population and analyse the observance of citizens' rights to safe conditions of stay during air raids and emergencies, the Ombudsman's Office in Zhytomyr region inspected **33** civil protection facilities.

The monitoring visits were carried out through on-site inspections, analysis of information from local authorities and balance sheet holders, as well as comparison of officially declared data with the actual situation on the ground. The inspections covered civil protection facilities such as residential buildings, educational institutions, administrative and other public buildings.

The monitoring found that a significant number of the facilities (24 shelters) are in unsatisfactory or limited condition: cluttered rooms, faulty ventilation and lighting, inadequate sanitation, lack of a minimum supply of water and first aid kits, signs of flooding and corrosion. They are formally registered as ready, but in fact do not meet basic safety requirements.

In addition, systemic violations of the right of citizens to unimpeded access to civil protection facilities were recorded: limited access at night, locked entrances during alarms, lack of responsible persons, improper labelling and navigation. The situation is particularly critical for people with limited mobility: there are no ramps, no handrails, and civil protection facilities are not adapted for people with disabilities, the elderly, and parents with young children.

Discrepancies between official information and the actual state of civil protection facilities were also identified: 4 facilities are not included in the fund of protective structures, but are listed as accessible, or vice versa - 17 facilities are formally registered but unusable.

The results indicate systemic problems:

- A formal approach to accounting and assessing the readiness of civil protection facilities;
- insufficient control of local governments and asset owners;
- underfunding of measures to maintain and equip civil protection facilities;
- Ignoring the needs of vulnerable groups;
- lack of effective accountability for the inadequate condition of protective structures.

The condition of the facilities does not fully ensure the right of citizens to safe protection of life and health in the face of a military threat, and the declared level of preparedness does not correspond to the actual situation.

Based on the results of the visits, **140** recommendations were provided to local governments and balance holders of the defence facilities fund:

- Ensure that civil protection facilities are actually brought into proper condition;
- to conduct an inventory of the fund of protective structures with the exclusion of unsuitable objects;
- ensure round-the-clock and unimpeded access to civil protection facilities;
- adapt civil protection facilities for people with limited mobility;
- strengthen the personal responsibility of officials and balance holders;
- ensure regular public control over the state of civil protection facilities.

In order to exercise parliamentary control, a monitoring visit was carried out on 03.09.2025 to the facility of the protective structures fund based on the Prypiat River Basin Water Resources Management in Zhytomyr.

During the monitoring visit, it was established that the commissioned facility of the protective structures fund does not meet all the requirements of the legislation in the field of civil protection and does not provide adequate conditions for the safe stay of the population in the event of an emergency. The said facility of the protective

structures fund is not fully provided with the necessary minimum conditions set out in the order of the Ministry of Internal Affairs of Ukraine dated 09.07.2018 No. 579 for the accommodation of the population.

In particular, the violations include: lack of accessibility for people with reduced mobility; lack of a functioning warning system; lack of non-food items for children; lack of a bathroom in the shelter.

After the Commissioner sent a letter with recommendations to the owner of the shelter, the identified deficiencies were promptly eliminated and the shelter was made accessible to people with reduced mobility, the issue of arranging a bathroom in the shelter was resolved, a functioning warning system was ensured, and non-food items for children (toys, blankets, hygiene products, etc.) were provided.

The inspections resulted in 140 recommendations: **5** of them were implemented; **17** are in the process of implementation; **and 66** were not implemented.

RECOMMENDATIONS:

Zhytomyr Regional State Administration, Regional Military Administration:

Strengthen coordination and control over compliance with the minimum requirements for the life support of internally displaced persons, as well as free accommodation in places of temporary residence, including on the basis of dormitories of higher education institutions, in accordance with the minimum standards of functioning defined by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons";

ensure full implementation of the recommendations provided as a result of monitoring visits to the ICC in 2023-2025;

to provide methodological and practical assistance to local executive authorities and local self-government bodies, in particular to children's services, in promptly resolving issues related to child social protection;

ensure full compliance of organisational and administrative documents with the requirements of the Law of Ukraine "On Personal Data Protection", with the identification of responsible persons, as well as with the procedure for access and destruction of data.

Local self-government bodies:

Ensure timely responses to requests for information and citizens' appeals in accordance with the requirements of the law;

ensure timely updating of public information on official websites;

organise systematic control over the condition of civil protection facilities, especially for people with limited mobility, ensure their suitability and unimpeded access;
to ensure coordination of the activities of entities identifying and/or organising social protection of children in difficult life circumstances.

to take urgent measures to bring the personal files of children in difficult life circumstances, orphans and children deprived of parental care in line with the law;

take urgent measures to ensure that children who have reached the age of 14 receive a passport of a citizen of Ukraine in a timely manner;

publish information on the websites of information managers in accordance with the requirements of the Law of Ukraine "On Access to Public Information";

ensure that officials hold personal receptions of citizens in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals".

To the balance holders of the objects of the fund of protective structures:

bring the civil protection facilities to a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018 "On Approval of Requirements for the Maintenance, Arrangement and Operation of Civil Protection Facilities, Accounting of the Civil Protection Facilities Fund, Determination of Criteria for Impossibility of Further Maintenance and Operation

Ensure that civilians, including people with limited mobility, have round-the-clock access to civil protection facilities;

ensure that civil protection objects are clearly marked and equipped with navigation.

To the Main Department of the National Police in Zhytomyr region:

ensure proper implementation of the requirements of Article 212 of the Criminal Procedure Code of Ukraine;

to equip the territorial police units with rooms for detainees, the conditions of detention in which will meet national and international standards;

to ensure that procedural (investigative) actions with detainees and other procedural actions are carried out in specially equipped rooms with mandatory video recording of such actions in accordance with the established procedure;

to equip a room for investigative actions and a room for confidential meetings of detainees with defence counsels in territorial police units;

to equip the office (workplace) of the human rights inspector in the territorial police units;

to train police officers in the provision of first aid and to ensure that they receive certificates of the established form;

equip civil protection facilities in accordance with the requirements of the current legislation and ensure that the staff of the facility complies with security measures when the "Air Alert" signal is announced in Zhytomyr region;

to ensure the storage and placement of fire extinguishers in the territorial police units in accordance with the requirements of the law;

to ensure access for persons with disabilities and other low-mobility groups to the premises and sanitary facilities in territorial police units.

11.7. Zakarpattia Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **4,474** appeals from residents of Zakarpattia region, containing **5,479** reports of human and civil rights violations.

The most frequently mentioned human rights violations in the reports were: freedom from discrimination - **67**, civil rights - **2,578**, social rights - **422**, economic rights - **1,215**, personal rights - **168**, children's rights - **126**, appeals without the essence of the violated right - **107**, other issues - **796**.

The number of	20 22	20 23	2 024	202 5
Citizens' appeals	82 9	1 898	2 405	4 474
Reports of rights violations	1 013	2 345	2 768	5 479

Zakarpattia region, due to its relatively safe location, has become one of the key regions for receiving evacuees from the areas of active hostilities. In 2025, 39 evacuation trains with civilians arrived in the region from Donetsk and Dnipro regions. As of today, **123,827** internally displaced persons have been registered in the region, including 34,218 children, with 9,014 people registered as IDPs in 2025. In addition, 7 institutional care facilities with 112 children were evacuated to Zakarpattia from Donetsk, Dnipro, Zaporizhzhia and Odesa regions.

These circumstances have put a significant strain on the social protection, education and healthcare systems of the region.

In addition, evacuation trains regularly arrive in the region with wounded soldiers who need further treatment in civilian healthcare facilities in the region. A significant number of wounded soldiers and veterans undergo medical, psychological and physical rehabilitation in the region, as well as social adaptation after returning from the frontline.

At the same time, Zakarpattia region is characterised by significant ethnic diversity. Representatives of 101 national minority communities live in the region, making it one of the most multinational regions in Ukraine. There are 124 places of compact residence of the Roma national minority (community) in the region, which remains one of the most

vulnerable social groups and requires increased attention from state authorities and local governments to ensure the exercise of their rights.

A separate challenge is the geographical features of the region. There are 218 mountainous settlements in the region, where the population has limited access to medical, educational and social services, which requires additional management solutions to ensure equal access to basic rights and services.

The region borders on four European Union countries, which poses additional security and humanitarian challenges. In particular, the region receives people liable for military service, including those who try to avoid mobilisation by illegally crossing the state border into EU countries. In this regard, control and security measures have been stepped up in the region. In such circumstances, it is particularly important to ensure a proper balance between the implementation of the requirements of the mobilisation legislation and the strict observance of human rights and freedoms.

Monitoring visits/on-site inspections

In 2025, the Office of the Ukrainian Parliament Commissioner for Human Rights in Zakarpattia region carried out **342** monitoring visits and inspections. In particular, the following were conducted:

125 monitoring visits on the observance of the rights of internally displaced persons;

84 - monitoring visits on the observance of children's rights;

65 - on-site inspections in the field of information rights protection;

21 - visits to fulfil the functions of the national preventive mechanism;

20 - monitoring visits on observance of equal rights and freedoms;

11 - monitoring visits on observance of social and economic rights;

7 - monitoring visits on observance of the rights of military personnel;

5 - monitoring observations of the observance of procedural rights of participants in court proceedings in criminal, civil and administrative proceedings;

4 - inspections in the field of personal data protection.

Three acts of response were sent to the authorities: a submission on violation of the rights of children from the Vynohradiv Orphanage of the Zakarpattia Regional Council, a submission on observance of the rights of internally displaced persons and a submission on violation of the human right to life and security.

Eight reports of criminal offences were sent to law enforcement agencies.

The main issues addressed by the Ombudsperson's Office were:

- observance of children's rights;
- observance of human rights in the system of security and defence institutions, family members of prisoners of war and missing persons in special circumstances
- observance of information rights;
- observance of the rights of internally displaced persons;

- observance of citizens' rights to life and security;
- observance of the rights of persons of the Roma national minority (community);
- observance of the rights of women during pregnancy and childbirth to health care and medical assistance.

1. Observance of the rights of the child

In 2025, the Ombudsperson's Office in Zakarpattia region conducted 84 monitoring visits as part of parliamentary oversight to assess the observance of the rights and freedoms of orphans, children deprived of parental care, children in difficult life circumstances, the activities of children's services and guardianship and custody authorities, social service providers and the right to a safe educational environment under martial law.

As a result of the monitoring visits, 996 recommendations were made, reflecting the identified violations and problematic issues that directly affect the observance of children's rights.

The status of implementation of the recommendations is as follows:

- 318 recommendations (31.9 per cent) have been implemented;
- 201 recommendations (20.2%) are in the process of being implemented;
 - partially implemented - 290 recommendations (29.1%);
 - not implemented - 187 recommendations (18.8%).

Thus, 71.2% of the recommendations are in the process of being implemented or have already been implemented, while 18.8% of the recommendations remain unimplemented.

The results of the visits showed the actual inability of the existing system to provide a timely response to threats to the life, health and dignity of the child, and revealed the existence of systemic violations caused by the improper exercise of powers by local authorities and other responsible actors.

Children's services in 17 territorial communities operate in conditions of staff shortages, overload and formalism, which makes it impossible to identify children in difficult life circumstances in a timely manner and respond appropriately to threats to their life and health. The best interests of the child remain declarative, and decisions made are not based on an assessment of the safety, needs and risks for a particular child.

Ineffective interagency cooperation, the lack of approved algorithms for joint action in crisis situations and the shifting of responsibility between child protection actors lead to loss of time, inaction and prolonged stay of children in dangerous conditions, including in situations of domestic violence.

The lack of social and specialised services in communities leads to decision-making based on the availability of institutional places rather than on the needs of the child, which contradicts the principle of prioritising family-based care and contributes to the prolonged institutionalisation of children.

Taken together, the above indicates that the state at the local level has actually lost its ability to guarantee timely protection, safety and development of children, which creates real risks to the life, health and dignity of children and requires an urgent systemic response.

1.1. Violations of the rights of children in difficult life circumstances

In 2025, the inaction of entities authorised to protect the rights of children in difficult life circumstances, including children's services, municipal social service providers, educational institutions, healthcare facilities, and national police, was revealed, which led to the actual deprivation of such children of adequate protection by the state and their being left in conditions that threatened their lives and health.

In the course of the work, 30 children in difficult life circumstances were identified in the settlements of the region and left in conditions that could pose a direct threat to their lives and health.

On 09.10.2025, during a monitoring visit to the Velykyi Bereznyi territorial community, it became known about the V. family, which is raising eight young children and is in difficult life circumstances. In order to confirm this fact, a visit was made to the family's place of residence and signs of a threat to the life, health and development of the children were recorded. The children were left without parental care, and the responsibility for raising the younger children was transferred to the eldest child.

Inadequate material and living conditions were found, the housing was in a state of disrepair, there was no food or hygiene products. The children were in unsanitary conditions, neglected, hungry, dressed out of season, with signs of illness. The condition of the youngest child, born in 2024, was critical, as she was without proper care and safe conditions, unable to move, lying in her own faeces, without hygiene products, with skin rashes, and no baby food.

In order to take immediate measures to save the lives and health of children, protect their rights and interests, the representative of the Ombudsperson in Zakarpattia region called an ambulance and notified the National Police of Ukraine, the Service for Children, the Centre for Social Services and the leadership of the Velykyi Bereznyi village council. However, authorised representatives of the Service for Children and the Centre for Social Services did not arrive at the scene.

Instead, it was established that on 08.10.2025, employees of the Service for Children and the Centre of Social Services, together with employees of the National Police of Ukraine, visited the family, saw that the children were left in conditions of threat to life and health, but did not take any measures to protect the children.

Since 2015, the Service for Children, the Centre for Social Services, the police and other actors of interagency cooperation in the community have been aware of the family's difficult life circumstances, and the children have been removed from the family several times. However, the family was registered as being in difficult life circumstances only in December 2024. The service never made a child safety assessment at all, and the decisions of the guardianship and custody authority to protect the rights and interests of children were based on an

unfulfilled assessment of the family's social service needs, as specialists were not allowed to enter the home.

Officers of the National Police of Ukraine repeatedly drew up administrative reports against the mother under Part 1 of Article 184 of the Code of Administrative Offences for improper performance of parental duties. During the consideration of the case on an administrative offence, a judge of the Velykyi Bereznyi Court found signs of a criminal offence in the mother's actions and, by a decision of 22 October 2024, ordered the Uzhhorod Department No. 2 of the Transcarpathian Regional Police to initiate a pre-trial investigation against citizen V. under Part 1 of Article 166 of the Criminal Code of Ukraine for malicious failure to fulfil childcare responsibilities.

During the targeted monitoring on 16.10.2025, the Children's Service of the Velykyi Bereznyi Village Council of the Zakarpattia region revealed an attempt by officials of the Children's Service and the Centre for Social Services to conceal criminal inaction by forging and drawing up fictitious documents (logs of incoming and outgoing correspondence, records of children and families in the SFC, acts of inspection of family living conditions, acts of assessment of social service needs and applications for the mother's refusal of social services for 2024-2025).

Given the obvious threat to the lives and health of the children and the lack of proper response from officials, a criminal proceeding was initiated under Article 137 of the Criminal Code of Ukraine upon the report of the Ombudsman's representative in the Zakarpattia region.

As a result of the measures taken, the children were provided with a medical examination and the necessary medical care, placed in a safe place of stay, provided with state protection and appropriate legal status.

Similar cases have been reported in other territorial communities of the region, which indicates a systemic lack of proper social support and untimely provision of support to families in difficult life circumstances.

In October 2025, during monitoring visits to the Kostrynska territorial community, the representative of the Ombudsman in the Zakarpattia region learned about two large families, G. and B., with a total of seventeen children, who may be in difficult life circumstances.

The monitoring visits revealed that neither of these two large families was registered with the Service for Children and the Centre for Social Services of the Kostryn village council in Zakarpattia region as being in difficult life circumstances and were not provided with social services. Local government officials had information about the vulnerability of this category of children, their families and the factors that cause difficult life circumstances, as these are large, low-income families (including single mothers), where domestic violence is systematically committed. Despite the privileges of this category of families, the children are not even provided with free meals in educational institutions. During visits to these families at their place of residence, it was found that these families have not used state social benefits for a long time, do not receive proper payments,

have problems with paperwork and are effectively deprived of systemic social support. The financial situation of the families was difficult.

The living conditions of the families were extremely difficult, children did not have separate places to sleep and rest, and five children and their parents shared one bed. The only furniture in the apartment was a sofa, a bunk bed and a small table, which did not meet the basic needs of the children and the family as a whole. There was no bed linen, only damaged mattresses. There were no places for children to study. According to the children, they ate pasta only once a day. The only food available was a few kilograms of potatoes and instant soups. There were no hygiene products, school supplies, clothes, household appliances or proper utilities. The water was unfit for consumption (dirty, silted), only for technical use. The children actually lived in a state of constant domestic and social neglect.

Until 05.06.2025, school-age children studied at the Velykyi Bereznyi Sanatorium Boarding School of the Transcarpathian Regional Council, where they lived on full board, which was additional support for the family. After this educational institution was re-profiled into the Velykyi Bereznyi Lyceum with enhanced military and physical training of the Zakarpattia Regional Council, the children returned home. Despite the educational institution informing officials of child protection actors about the children's departure from the educational environment, including the termination of their stay in the boarding school, the local community did not take any measures to assess the needs for social services, provide the family with support, protection and timely identification of children in difficult life circumstances. Despite this, children lived for a long time in conditions that did not meet basic safety requirements, and their needs were not met.

A separate serious threat to the rights and interests of children was identified by the presence of signs of domestic violence and the lack of proper response from interagency actors and the adoption of measures to protect victims.

The women victims repeatedly called the police and reported domestic violence committed against them by their husbands, including in the presence of children. However, the victims did not receive protection, despite the fact that the men had previously been registered with the police as perpetrators. In one of the families, police officers who responded to a report of domestic violence drew up administrative reports against the victim under Article 183 of the Code of Administrative Offences (knowingly false call to special services) and imposed a fine on her. Through additional inquiries, it became known that the woman had repeatedly reported domestic violence in the family. However, the police did not assess the risk of domestic violence and did not establish the fact of domestic violence committed by parents against children.

There is no properly organised work in the territorial community to identify children and families with children in difficult life circumstances or at risk of falling into such circumstances and to ensure priority measures for appropriate response, social protection of children, assistance and identification of ways to ensure the best interests of the child. There is ineffective cooperation with police,

education, healthcare and social services, in particular, there is no interagency cooperation between actors involved in combating and preventing domestic violence. The community has not developed and approved clear algorithms for joint actions in crisis situations, domestic violence, threats to the life and health of children, and interagency cooperation at the local level.

These circumstances are a direct violation of the provisions of the Resolution of the Cabinet of Ministers of Ukraine of 01.06.2020 No. 585 "On Ensuring Social Protection of Children in Difficult Life Circumstances" in terms of identifying and organising priority social protection measures for children in difficult life circumstances, as well as registering children in difficult life circumstances.

Following the response of the Ombudsman's representative in Zakarpattia region, the local government took measures to fulfil the powers of the guardianship and custody authority to protect the rights of seventeen young children, provided families with financial assistance, improved living conditions, and social services, including social support and medical care.

The inaction of local authorities in cases of threats to a child's life and health is particularly dangerous. Often, reports of abuse, domestic violence, neglect or improper performance of parental duties are left without proper verification and response. Untimely intervention, failure to make decisions on immediate child protection, and delays in removing a child in cases provided for by law create conditions under which a child is forced to stay in an unsafe environment for a long time, and is subjected to repeated trauma and violence.

1.2. Child begging and lack of response from authorised bodies

Ensuring the protection of the rights and best interests of the child is one of the priority responsibilities of the state and local authorities. Any cases of children being involved in begging, as well as parents failing to fulfil or improperly fulfilling their responsibilities for the maintenance, upbringing and development of their children, require an immediate, comprehensive and coordinated response from the authorised bodies. At the same time, in Bedevlyanska, Velykodobronska, Kostrynska, Kholmktivska village and Velykyi Berezhnyi settlement territorial communities of Zakarpattia region, systemic problems are identified in the area of protection of children's rights and interests, in particular in terms of timely identification of families in difficult life circumstances and proper response to threats to children's safety. In 6 of the cases reviewed, such families were not identified by children's services on their own, children were not registered in a timely manner, and child safety assessments were either not conducted at all or were conducted formally. In addition, the lack of proper interagency cooperation between children's services, educational, healthcare, social protection institutions and the National Police of Ukraine makes it impossible to identify risks early, respond in a timely manner and prevent child rights violations.

On 15 September 2025, while working in the Bedevlyanska rural territorial community, a minor child V. personally approached the representative of the Ombudsman in the Zakarpattia region with a request to provide money and food, citing the lack of food at home. The systematic begging by the minor child V. at the VAKOS petrol station (Tyachiv district, Bedevlya village) and theft of food in local shops were established.

In order to protect the rights and legitimate interests of the child, in particular, to take measures to respond to the fact of begging by a minor child and parental evasion from fulfilling parental responsibilities to ensure proper living conditions and upbringing of the child, the representative of the Commissioner in the Transcarpathian region immediately sent letters - requests to the head of the territorial community, the Service for Children, the Main Department of the National Police in the Transcarpathian region and on 16.09.2025 conducted a targeted monitoring visit to the Service for Children of the Bedevlya Village Council.

During the targeted monitoring visit, the head of the service reported that the representative's appeal had been properly responded to and all measures had been taken within the framework of the current legislation, provided information that there were no difficult life circumstances in the family, living conditions were good, and the child's needs were met properly, but she could not provide confirmation, as no assessment of the child's safety and assessment of the family's needs for social services had been carried out, and no relevant acts had been drawn up. The service made a visit to the family without the involvement of child welfare actors (social work specialist, representative of the juvenile police, healthcare, education, psychologist, etc.) The service also provided information that on 14.09.2025 (Sunday) a letter was sent to the Tyachiv Department of the Main Department of the National Police in Transcarpathian region as an additional measure to protect the rights of the child. Subsequently, it was found out that the letter was sent on 16.09.2025, and its content revealed the need to take measures against the mother of a young child who was begging (the addresses of the mother and child were different), as she did not fulfil her parental responsibilities towards her daughter and the need to bring her to justice for this fact. No other actions were taken.

It was established that the Children's Service had not taken adequate measures to protect the rights and interests of the child and to respond to reports of a child in difficult life circumstances due to begging, failure to fulfil parental responsibilities towards a minor child, and a possible threat to his or her life and health, which is a direct sign of inaction by the Children's Service and concealment of signs of a child in difficult life circumstances.

In view of the identified circumstances, at the initiative of the representative of the Ombudsman in Zakarpattia region, a second visit to the family where the child lives was made, during which the critical situation and inadequate living conditions were established, as well as the absence of the child at the place of residence. The house is an unauthorised building, consists of one

room, does not have water supply, proper conditions for sleeping (instead of a bed, the child slept on a board, covered with a rag), education, hygiene and nutrition. The conditions revealed indicate neglect and social neglect of the child, as well as violations of child protection legislation. The child's mother has been abroad since 2022 and does not participate in the child's upbringing and maintenance. The child lives with S., who has not legally acquired the status of her legal representative, as the child is registered under Article 135 of the Family Code of Ukraine as a child of a single mother. At the same time, circumstances were identified that indicate manipulation of paternity and registration of the child, as well as the facts of the child's movement without proper control of the guardianship authorities. According to the testimony of person S., it was recorded that in 2022, the mother entered into a fictitious marriage with a man who later acknowledged paternity for money. As a result, the man received a deferral from mobilisation and the right to cross the border as a father with many children who did not participate in the child's upbringing. It was established that for three years the child had already had a changed surname from V. to M. and registered paternity, which no one in the territorial community knew about, and the mother had moved to Germany and did not participate in the child's upbringing. It was only after the Ombudsman's representative in Zakarpattia region established these facts that the local community took interagency response measures.

After reporting to the National Police of Ukraine and conducting search operations, the child's whereabouts were established. A child was interviewed in a child-friendly environment and a safety assessment was carried out, which led to a decision to immediately take the child and place him in a healthcare facility for examination. The child was registered as a child without parental care.

The monitoring group provided recommendations to the management of the Service for Children, initiated an extraordinary meeting of the commission for the protection of children's rights, established interagency coordination and proved the personal responsibility of community officials. The child's right to protection by guardianship and custody authorities and to safety was restored.

Systemic violations of the rights and freedoms of children in difficult life circumstances were identified in the Velykoluchkivska rural territorial community, including the formal approach of the guardianship and custody authority and the Children's Service to protecting children's rights and ensuring the best interests of children.

In February 2025, during a monitoring visit to the Children's Service of the Velykoluchky village council, the family of G., in which a single mother is raising five children, was identified. It was established that twelve children were previously brought up in the family, and due to the mother's inadequate performance of parental duties towards the two older children, she was deprived of parental rights. Children from this family were repeatedly removed, and the

existing five children had been registered with the Service for Children for years as being in difficult life circumstances.

The situation became critical due to a real threat to the lives and health of children who had been living for a long time in conditions that did not meet basic safety requirements. In particular, at the end of 2024, a one-year-old child from this family was hospitalised at the Regional Children's Hospital of the Zakarpattia Regional Council in the surgical department with injuries caused by rat bites. According to the available information, the mother did not visit the child during her stay in the hospital and did not take an interest in the child's health.

The healthcare facility repeatedly sent official notifications to the Velykoluchivka Territorial Community Children's Service regarding the provision of medical care to the child, stabilisation of his condition and the need to take measures to protect the child's rights due to the mother's improper performance of parental duties. Despite this, the Children's Service and the guardianship and custody authority failed to make timely decisions on the removal of children from the family and to provide them with appropriate legal status, which led to a prolonged stay of one child in a healthcare facility in the absence of medical indications, as well as to a violation of the right of children to be brought up in a family environment and to proper state protection.

No measures to protect the rights of children were taken by the Children's Service, and the guardianship and custody authority of the Velykoluchky village council decided to return the child to the place of residence, despite the fact that the living and upbringing conditions continued to pose a threat to their lives and health. The decision was made without taking into account the family's condition, determining the parental potential and the mother's ability to fulfil her parental responsibilities, and without taking into account the factors that provoke a threat to children, as no child safety assessment was carried out, and no assessment of the family's needs for social services was carried out, no social services were provided to the family, as there was no social service provider in the territorial community. Instead, there are signs of discrimination in the activities of the Service for Children, as the report on the examination of living conditions states that the family's living conditions are "typical for the Roma population". Based on this act, the child was returned to the family.

Also, in 2025, signs of a criminal offence against a minor child were found in relation to the same mother. In particular, it was established that on the eve of the monitoring visit, citizen H. gave birth to a child and agreed to acknowledge the paternity of citizen Z. for a monetary reward, which was intended to evade mobilisation and further leave the territory of Ukraine.

The possible involvement of lawyer V. and village council member R. in these actions was established. In order to respond appropriately and document the possible crime, the representative of the Commissioner in Transcarpathian region sent a report to law enforcement agencies, which resulted in the pre-trial investigation being initiated by the Police Department No. 1 of the Mukachevo

District Police Department of the Main National Police in Transcarpathian region within the framework of criminal proceedings.

These facts indicate a violation of the requirements of the Law of Ukraine "On Protection of Childhood", the Procedure for Providing Social Protection of Children in Difficult Life Circumstances, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 585 of 01.06.2020, as well as the Resolution of the Cabinet of Ministers of Ukraine No. 866 of 24.09.2008 "Issues of the Activities of Guardianship and Trusteeship Bodies Related to the Protection of Children's Rights", in terms of ensuring proper protection of the rights and interests of the child by the state.

Following the response of the representative of the Ombudsman in the Transcarpathian region, urgent measures were taken to preserve the life and health of the children from the family, in particular, their urgent hospitalisation and necessary medical examinations were ensured, during which the children were diagnosed with tuberculosis. Measures are currently being taken to ensure further social protection of the children and their placement in family-based care.

In addition, the representative of the Ombudsman in Zakarpattia region sent response letters to the Main National Police in Zakarpattia region and the Zakarpattia Regional Prosecutor's Office regarding the alleged commission of a criminal offence.

The above facts indicate the existence of systemic problems in the protection of children's rights and interests at the level of territorial communities in Zakarpattia region in terms of timely identification of families in difficult life circumstances and proper response to threats to children's safety.

There is a lack of proper interagency cooperation with educational, healthcare, social protection and National Police institutions, which makes it impossible to identify risks and prevent child rights violations.

The above indicates inadequate organisation of work at the local level, staffing and functional incapacity or inactivity of certain services for children and lack of effective control by local authorities, and requires an urgent systemic response.

1.3. Violations of the child's right to a safe educational environment

Every child has the right to access a safe, properly organised and quality educational environment that promotes their comprehensive development, knowledge, skills, social competences and intellectual potential.

In 2025, 9 monitoring visits were made to educational institutions in the region to establish the actual state of observance of the child's right to a safe educational environment.

The monitoring visits were conducted in the regional centre, cities and remote mountain communities of Zakarpattia region.

In November 2025, during a monitoring visit to the Ruskokomarivskyi Lyceum of the Baranyntsi Village Council, violations of children's rights to a safe educational environment, an adequate standard of living were identified, and children were studying in conditions that threatened their lives and health.

It was established that the educational process is carried out in a technical building, and the overhaul of the main building has been ongoing for more than three years. Only six temporarily adapted premises, which do not meet the requirements of the State Building Standards B.2.5-28:2018 "Buildings and structures. Educational Institutions", approved by the Order of the Ministry of Regional Development, Construction, Housing and Communal Services of Ukraine No. 264 dated 03.10.2018, and the requirements of the Sanitary Regulations for General Secondary Education Institutions, approved by the Order of the Ministry of Health of Ukraine No. 2205 dated 25.09.2020. The curriculum is not properly implemented, computer science lessons are held without the use of computer equipment, and physical education is held only under favourable weather conditions, as there is no gym.

The sanitary and hygienic and living conditions in the educational institution do not meet the established requirements. One of the classrooms does not have access to natural light, and the windows are covered with sandbags.

Teachers and students use a street toilet that does not provide adequate privacy, is not equipped with lighting, heating and water supply, no systematic cleaning and disinfection measures are carried out, and there is a persistent smell of ammonia in the air, the impact of which can cause negative health effects.

A long-term and systematic absence of about seventy students from the Roma national community from the lyceum was detected. In some cases, students had not attended the lyceum for more than six years, but continued to be registered as students of the institution, which may indicate abuse of office by officials. Failure to report the absence of children from school to the guardianship and custody authority deprived children of guaranteed protection from the state.

It was also found that in the event of an air alert, students and teachers use the dining room, which does not meet the requirements.

Despite the twenty-five million hryvnias allocated in 2022 from the budget of the Baranyntsi village council, of which only seven million had been spent as of November 2025, little work has been done over the past three years. The development of the design and estimate documentation did not provide for the arrangement of a shelter, a gym and architectural accessibility for groups of children with limited mobility, which violates the requirements of the Sanitary Regulations for General Secondary Education Institutions and may lead to the building not being put into operation.

The rights of children to safe and continuous education, guaranteed by Article 53 of the Constitution of Ukraine, Articles 3, 26, 53 of the Law of Ukraine "On Education" and the Law of Ukraine "On Complete General Secondary Education", were violated.

In order to respond immediately and ensure children's rights to education, the representative of the Ombudsman in Zakarpattia region sent a response letter to the Zakarpattia Regional Prosecutor's Office to provide a legal assessment and take appropriate measures within its competence, as a result, proceedings were opened under Article 191 (4) of the Criminal Code of Ukraine.

In addition, the Commissioner made submissions to the Minister of Education and Science of Ukraine, the Head of the Zakarpattia Oblast State Administration, and the Baranyntsi village head to take response measures based on the monitoring results.

Based on the results of the measures taken, the Baranyntsi village council reported on the implementation of a set of works aimed at improving the conditions of stay of students in the Ruskokomarivskyi lyceum. In particular, the main building of the institution is being overhauled, the roof has been completely replaced and part of the internal repairs have been completed, and the installation of modular toilets is being considered.

The lyceum has been equipped with a shelter, and additional premises have been used as simple shelters to ensure the safety of all participants in the educational process.

1.4. Violations of the child's right to health and medical care

In 2025, 9 monitoring visits were carried out to children's departments of healthcare facilities in the region and systemic violations of the child's right to healthcare and medical care were identified.

In particular, violations of sanitary, hygienic and logistical conditions, violations of catering with the use of expired food and cases of purchasing medicines at the parents' own expense were identified.

These violations were found in nine of the visited children's units, they are systemic and indicate insufficient control by the management of healthcare facilities and the founders - local governments.

During the monitoring visit to the children's department of the Perechyn Hospital of the Perechyn City Council, systemic violations of the child's right to health care and medical assistance were identified due to inadequate conditions for the provision of inpatient care. In particular, the institution lacked the mandatory structural and functional premises necessary to ensure safe and quality treatment of the community's children. These include an intensive care unit for children, an isolation ward for hospitalisation of children with suspected infectious diseases, a canteen for catering for children undergoing inpatient treatment, and a sanitary and hygienic room.

In addition, the children's department used a ward that was not adapted for long-term stay and treatment of children. Thus, it was established that three hospitalised children were placed in a technical room without windows at all, the area of which did not meet the minimum sanitary and construction standards.

As a result of the response of the representative of the Ombudsman in Zakarpattia region to the recommendations and a follow-up monitoring visit, it was established that the violated rights of children had been restored, and the administration of the medical institution, by order of the head of the Perechyn City Council of 22.08.2025 No. 137/09-05, moved the children's department to a building with proper conditions, in compliance with sanitary and hygienic standards and the terms of the contract for medical care under the medical guarantee programme.

Providing children undergoing inpatient treatment in paediatric wards of healthcare facilities with safe, high-quality and nutritious food is an integral part of the realisation of their right to healthcare and appropriate treatment conditions. The nutrition of children in healthcare facilities should meet age-related needs, medical indications, sanitary and hygienic norms and food safety standards, and contribute to the restoration and promotion of the child's health.

At the same time, the results of monitoring visits to children's departments of healthcare facilities indicate that there are problematic issues in the area of children's nutrition, which can negatively affect their health and violate their rights guaranteed by law. In this regard, it is important to analyse the compliance of healthcare facilities with the requirements of the legislation on children's nutrition and to assess the effectiveness of measures aimed at ensuring the proper quality and safety of food in children's wards.

During the monitoring visits to the children's wards of the Velykyi Bereznyi Hospital and the Tyachiv District Hospital, violations of children's rights to safe and adequate nutrition were identified. In particular, during the monitoring in the children's wards, children were fed expired food.

In the children's ward of the Tyachiv District Hospital, children and women in labour consumed expired sausages and milk, which could lead to food poisoning and posed a direct threat to the lives and health of women and children.

In the children's ward of the Velykyi Bereznyi Hospital, significant amounts of expired food were found, which, according to the menu as of the date of monitoring, were used to feed the patients of the children's ward. The total weight of expired food in of both departments was 146 kilograms, which were seized and written off on the basis of Food Write-Off Certificates during the monitoring visits.

The totality of the facts revealed indicates the inaction of officials and the lack of proper internal control over the organisation of food in children's wards, which posed a real threat to the lives and health of children, including newborns and infants who are breastfed.

In addition, the analysis of the menu plans revealed that the children's nutrition was inadequate and did not meet the body's needs for sufficient nutrients necessary for health recovery and recovery.

These violations pose a risk to the health of children, violate their right to proper and safe nutrition guaranteed by Article 6 of the Law of Ukraine "Fundamentals of the Legislation of Ukraine on Health Care" and the

requirements of Order of the Ministry of Health of Ukraine No. 931 of 29.10.2013 "On Approval of the Procedure for Organising the System of Medical Nutrition for Patients in Health Care Facilities", as well as other provisions of the current legislation of Ukraine.

Based on the results of the monitoring visits, reports with recommendations were sent to the directors of the Velykyi Berezhnyi Hospital and Tyachiv District Hospital, which were fully implemented, and the nutrition was brought in line with the current legislation, which made it possible to restore the rights of patients of both institutions.

1.5. Violation of children's right to health improvement and recreation

The results of the monitoring visits conducted in 2025 on the observance of children's rights to health improvement and recreation indicate the existence of systemic violations of children's rights to health improvement and recreation funded from the budget. The conditions in which children stay in health and recreation facilities often do not meet safety requirements, sanitary and hygienic standards, nutritional standards and the principle of ensuring the best interests of the child, which effectively defeats the purpose of such measures. The problem is caused by the inadequate organisation of the institutions' activities, the lack of effective internal control, a formal approach to compliance with legal requirements, and insufficient supervision by the founders and authorised bodies. As a result, budgetary funds allocated for the rehabilitation of socially vulnerable children do not ensure an adequate level of protection of their rights.

During the monitoring visit to the Children's Sanatorium-type Institution "Karpaty" of the Subsidiary Enterprise "Clinical Sanatorium "Karpaty" of the Private Joint Stock Company of Medical and Healthcare Institutions of Trade Unions of Ukraine "Ukrprofzodorovnytsia" (hereinafter - the sanatorium, institution) , systemic violations of the right of a child to health improvement and recreation at the expense of budgetary funds were identified, in particular, in relation to orphans, children deprived of parental care, children whose parent was killed (missing) in the area of hostilities, children from large families, children from low-income families, children registered as internally displaced persons, and others.

The established facts indicate that the conditions of children's stay in the institution do not meet safety requirements, sanitary and hygienic norms, dietary regime and standards of ensuring children's rights, which violates the very purpose of rehabilitation and recreation.

During the monitoring visit, facts of violations of children's rights to life and safety were revealed. It was found that in the event of an emergency or air raid alert, the actual safety of children and staff is not ensured. The existing shelter does not meet basic safety requirements and is unsuitable for its intended use. There is no necessary equipment, no warning system, no approved algorithms

of actions and no regular training in the event of an air raid, which deprives children of proper protection and poses a direct threat to their lives.

It was also found that some of the educators are not officially employed, which leads to the fact that the employees do not actually bear legal responsibility for the lives and health of children.

There are ponds on the territory of the sanatorium, but due to the lack of fencing, children have unimpeded access to them, which creates a high risk of accidents. The simultaneous presence of a large number of adult holidaymakers and children on the territory of the sanatorium poses additional safety risks. It has been established that conflict situations arising in such an environment are not resolved by the administration of the institution, even in the presence of repeated complaints. In addition, children live on the same floors as adults, which leads to uncontrolled contacts and conflicts and poses a potential threat to children's safety.

The sanitary and hygienic condition of the living quarters does not meet the established requirements. The facility uses feather pillows, worn-out blankets, and bed linen in a poor state of repair. Most of the mattresses are unusable, some of them are damaged, broken springs protrude outwards, which creates a risk of injury to children and harms their health.

During the visit, it was noted that older children in the facility use electronic devices to heat tobacco, including IQOS. The administration of the sanatorium does not take adequate measures to prevent children from using tobacco products, which negatively affects their physical and mental health.

During confidential communication, children complained about the quality of food. According to them, the food is not tasty, and children are forced to eat fast food. The facts of cooking in the living rooms were recorded by the monitoring group. In addition, the children were not provided with adequate access to safe drinking water, which forced them to use water from open sources, which posed a threat to their health.

On the day of the visit, it was found that the group of children who arrived at 09:00 was not provided with breakfast and only after the intervention of the representative of the Ombudsperson in the Transcarpathian region, the children were provided with food at 13:00. It was also recorded that children had free access to alcoholic and energy drinks sold in the retail network and spontaneously on the territory of the institution, which is unacceptable for children's diets.

The identified violations indicated non-compliance with the requirements of the Law of Ukraine "On Health Improvement and Recreation of Children" in terms of the provision of low-quality health improvement and recreation services for children at the expense of budgetary funds.

In order to respond promptly and ensure children's rights to health improvement and recreation, the representative of the Commissioner in Zakarpattia region sent a response letter to the Inspection Department in Zakarpattia region of the Western Interregional Department of the State Labour Service to verify the actual employment of educators and bring the management

of the sanatorium to justice for violation of part three of Article 41 of the Code of Administrative Offences. In addition, letters were sent to the Zakarpattia Oblast Prosecutor's Office to analyse possible signs of criminal offences and ensure a prosecutorial response.

As a result of the Commissioner's response, the State Enterprise "Clinical Sanatorium "Karpaty" received a response to eliminate the violations. In particular, it was reported about the proper arrangement of the shelter and purchase of an emergency alert system; ensuring official employment of the children's camp staff; creating proper living conditions for children, keeping the premises in proper sanitary and hygienic condition and regular disinfection; organising adequate and proper nutrition; taking measures to prevent violence and child abuse; ensuring the safety of children on the territory of the institution; organising meaningful leisure and recreation. These measures made it possible to restore the right of 2,076 children to decent and safe conditions of stay during rest and recreation.

2. Observance of human rights in the system of security and defence institutions, family members of prisoners of war and missing persons in special circumstances

On 1 May 2025, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War in Zakarpattia Oblast (hereinafter referred to as the Regional Working Group, RWG) started its work under the chairmanship of the Ombudsman's representative in Zakarpattia Oblast. The work of the RWG is aimed at providing systematic support to the families of prisoners of war and persons who went missing under special circumstances.

The members of the RWG regularly hold personal meetings with citizens, provide legal advice and explain the established procedures, providing families with support. In the first 8 months of 2025, 1,038 citizens' appeals were processed, 14 group meetings were held with the participation of 627 families, and 280 personal electronic accounts were created on the official website of the Coordination Headquarters, which allows families to quickly monitor the status of their loved ones.

This work addresses not only practical issues, but also provides emotional support to every family in an extremely difficult situation.

2.1. Violations of citizens' rights by the CCC and JV employees during mobilisation activities

In 2025, the Ombudsman's Office in Zakarpattia region received 55 appeals and complaints about the actions of employees of territorial recruitment and social support centres.

The main issues raised by citizens included humiliation of veterans' honour and dignity; abuse of office; violation of the procedural order of mobilisation measures; unlawful detention and imprisonment for an indefinite period; beating of persons liable

for military service by employees of the TCC and SP; failure to respond to appeals; refusal to receive and register appeals; failure to respond to information requests, etc.

On 02.10.2025, the Ombudsman received an appeal from citizen O. regarding violation of his right to liberty and security of person by police officers and the Uzhhorod District Territorial Centre for Recruitment and Social Support (hereinafter - Uzhhorod RTCS and SP).

According to citizen O., it was established that employees of the Uzhhorod RTCS and SP had taken him to the Uzhhorod RTCS and SP with threats of physical force and unlawful demand and started drawing up a report on an administrative offence under Part 3 of Article 210-1 of the Code of Administrative Offences, despite the applicant's notification that a similar report had been drawn up earlier by the Mukachevo RTCS and SP and the case had been closed due to the expiry of the time limit for bringing to justice.

During the drawing up of the report, the applicant was denied legal aid and access to a lawyer who was actually located under the building of the Uzhhorod RCCC and JV. The second copy of the report was not provided to the detainee. After the decision to bring him to administrative responsibility was issued, O. was not released from the premises of the RCCC and JV and was detained without any reason from the evening of 02.10.2025 to 03.10.2025, which indicates an actual illegal deprivation of liberty and a gross violation of his constitutional rights and freedoms.

A representative of the Ombudsman conducted a targeted visit to the Uzhhorod RCC and JV. The visit revealed facts of restriction of freedom of movement, violation of the right to defence and procedural guarantees, and immediate letters of response were sent to the Transcarpathian Specialised Defence Prosecutor's Office in the Western Region, the National Police of Ukraine and the Main Directorate of the Military Law Enforcement Service in the Armed Forces of Ukraine.

After the Ombudsman's intervention, the citizen O. was immediately released in compliance with his legal request. Subsequently, accompanied by the Ombudsman's representative, citizen O. left the premises of the Uzhhorod RCC and JV. As a result of the measures taken, the citizen's right to liberty and security of person was restored.

A citizen U., a veteran of the Russian-Ukrainian war, a person with a group II disability, appealed to the Ombudsman's representative in Zakarpattia region, reporting humiliation of his honour and dignity by the employees of the Uzhhorod District Territorial Centre for Recruitment and Social Support (hereinafter - Uzhhorod RTCS and SP).

The applicant stated that during mobilisation activities, he was stopped on the street by employees of the Uzhhorod RTCS and SP, who made insulting remarks, humiliated his honour and dignity, and committed actions that showed

signs of psychological pressure. At the same time, the police officer present at the scene did not take any action, thus committing inaction.

As a result of the response of the representative of the Ombudsman in Zakarpattia region, the guilty servicemen were brought to disciplinary responsibility, and officials of the Uzhhorod RTC and JV publicly apologised to the veteran.

As a result of the measures taken, the veteran's right to respect for honour, dignity and personal integrity was restored.

The identified circumstances indicate a violation of constitutional human rights and freedoms, in particular the right to liberty and security of person; to free movement; legal assistance and protection.

3. Observance of information rights

In 2025, **65 on-site inspections** of the websites of 64 territorial communities of the region and the Zakarpattia Regional Council were carried out to ensure that they comply with the right of citizens to apply for and receive access to public information.

The inspections revealed some violations of human and civil rights and freedoms, in particular, in terms of ensuring openness and transparency of information on the use of budget funds.

It was found that some local governments do not ensure proper disclosure of information on official websites, which lack data on salaries, allowances and bonuses of local government officials, as well as orders on their bonuses. Most communities did not publish schedules for personal reception of citizens, procedures and deadlines for consideration of appeals, mechanisms for appealing against them, reports on consideration of appeals, and lacked functionality for submitting electronic petitions.

Other systemic violations included the lack of clearly defined sections on the procedure for submitting appeals and requests for information, inaccurate or non-functional contact details, failure to identify responsible officials, failure to fill in information or update information, and failure to publish public information in the form of open data.

Based on the results of on-site inspections in 2025, 325 recommendations were provided, reflecting the identified violations and problematic issues that directly affect the observance of the right to appeal and information.

The status of implementation of the recommendations is as follows:

- 50 recommendations (15.38%) have been implemented;
- 60 recommendations (18.46%) are in the process of being implemented;
- partially implemented - 90 recommendations (27.69%);
- not implemented - 125 recommendations (38.46%).

Thus, more than 60% of recommendations are in the process of implementation or have already been implemented, while almost 40% of recommendations remain unimplemented.

As a result of the Ukrainian Parliament Commissioner for Human Rights' response to the identified violations, **252,802 people had** their information rights restored.

During the on-site inspection of observance of human and civil rights to information, it was established that the Serednyanska territorial community had no official website of the local self-government body, which complicates access to public information for the community residents and indicates inadequate openness and transparency of the local self-government body.

As a result of the Ombudsman's response and implementation of the recommendations, an official website was launched in Serednyanska territorial community, which ensured the restoration of the citizens' right to access public information and created preconditions for increasing the openness of the local self-government body.

During the on-site inspection of the official website of Uzhhorod City Council for compliance with the Law of Ukraine "On Citizens' Appeals", restrictions on citizens' rights to receive personal appointments were found. It was found out that the Mayor of Uzhhorod City Council had issued an order to hold a personal reception of citizens in the format of a "telephone line", which did not meet the requirements of Article 22 of the Law of Ukraine "On Citizens' Appeals", which provides for the right of citizens to receive personal reception by local government officials.

Based on the results of the Ombudsman's response and recommendations, Uzhhorod City Council took measures aimed at eliminating the identified violations and increasing the level of openness and accessibility of information for the local community residents. In particular, it resumed personal reception of citizens, which prior to the on-site inspection was actually carried out exclusively in the format of a "telephone line", and published on the official website of the city council a schedule of personal reception of citizens by the mayor and his deputies.

4. Observance of the rights of internally displaced persons

In 2025, **61 monitoring visits** were carried out to ensure the observance of the rights of internally displaced persons in places of temporary residence (hereinafter referred to as TACs).

Based on the results of the monitoring visits in 2025, 229 recommendations were provided, reflecting the identified violations and problematic issues that directly affect the living conditions of internally displaced persons.

The status of implementation of the recommendations is as follows:

- implemented - **97** recommendations
- 110 recommendations are in the process of implementation;
- partially implemented - 6 recommendations

-16 recommendations have not been implemented.

Thus, 90% of the recommendations are under implementation or have already been implemented, while 7% of the recommendations remain unimplemented, which requires additional control by the state authorities and local self-government bodies.

The main violations of the rights of internally displaced persons in places of temporary residence are: inadequate living conditions; illegal collection of fees from persons who were forced to move to the territory of Zakarpattia region as a result of armed aggression; and misuse of premises renovated and equipped by international donors for free accommodation of internally displaced persons.

4.1 Unlawful collection of accommodation fees from internally displaced persons in places of temporary residence

One of the widespread problems in the field of ensuring the rights of internally displaced persons (hereinafter - IDPs) is the illegal collection of fees for accommodation in places of temporary residence, which contradicts the current legislation of Ukraine and violates the social and property rights of IDPs, since places of temporary residence of IDPs (dormitories, educational institutions, communal facilities, objects transferred to the use of local self-government bodies) are created for the purpose of free or preferential accommodation of persons who were forced to leave their place of permanent residence as a result of the conflict.

As a result of monitoring visits to temporary accommodation facilities (TAFs) in Chop at 3 Myru Street and 3 Pryozerna Street, facts of illegal collection of utility bills from IDPs residing in these TAFs were revealed, which indicates non-compliance with the requirements of the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023 "Some Issues of Functioning of Temporary Accommodation Places for Internally Displaced Persons" and No. 261 of 11.03.2022 "On Approval of the Procedure and Conditions for Providing Compensation for Utility Services Consumed during Accommodation of Internally Displaced Persons in Buildings (Premises) of State, Communal and Private Property during the Period of Martial Law".

According to the receipts provided by the residents, the amount of debt for utilities was over UAH 340 thousand, and taking into account the debts of persons who had left the ICC, it was expected to increase to over UAH 500 thousand.

The financial burden was excessive and disproportionate for IDPs. In winter, the rent for one room for a family of five, including three children, was up to UAH 12,500 per month. As a result of the accumulation of significant debts, court proceedings were initiated against the residents of the MCC, enforcement measures were taken, and some families were forced to take out loans to repay the debt under court decisions.

As a result of the Ombudsman's response, the Chop City Council cancelled the accommodation fee, introduced a mechanism for compensation for utilities, and allocated funds to partially repay the accumulated debt, which allowed 71

IDPs to restore their violated rights to free accommodation in temporary accommodation and reimbursement of utility costs.

4.2. Violation of the rights of internally displaced persons to use housing provided by international donors.

An urgent problem in the area of ensuring the housing rights of internally displaced persons is the violation of the right to use housing repaired, reconstructed or equipped at the expense of international donors and humanitarian organisations. Such violations contradict both the national legislation of Ukraine and the obligations undertaken by the state and local governments in the framework of donor programmes.

Residential premises renovated and equipped with financial support from international donors are intended solely for temporary accommodation of IDPs, taking into account their vulnerable social situation. However, in practice, there are cases when the projects are not completed:

- IDPs are restricted in their right to use such housing;
- the housing is not used for its intended purpose;
- the premises are transferred to other categories of persons without proper legal grounds.

The parliamentary control revealed violations of the intended purpose of premises renovated and equipped at the expense of international organisations and intended for free accommodation of IDPs. In particular, six such facilities were found in the Transcarpathian region that had not been put into operation for a long time to accommodate IDPs, despite their intended purpose.

During the monitoring visits, it was found that the premises were in a state of readiness to accommodate persons evacuated from the areas of active hostilities or required only minimal refurbishment, but had not been used for their intended purpose for two years.

As a result of the Ombudsman's response and implementation of the recommendations, three facilities were prepared for the reception of internally displaced persons and reserved for the accommodation of evacuated groups, thereby restoring the rights of 86 IDPs to reside in the ICC in the Zakarpattia region, and measures are being taken to equip two facilities.

At the same time, during a monitoring visit to the facility in Dubrynychy village, 73 Tsentralna Street, which was repaired and equipped at the expense of international and charitable organisations for the purpose of free accommodation of IDPs, it was found that the building had not been used for its intended purpose for more than two years, including for the accommodation of persons evacuated from active hostilities, which deprived IDPs of the opportunity to use the prepared housing in times of urgent need. At the same time, it was found that the premises

were fully prepared for settlement: repairs were carried out, living and common rooms were equipped, furniture, household appliances and other essentials were provided.

Based on the results of the monitoring visit, the Transcarpathian Regional Military Administration received recommendations and sent three letters to include the premises in the ICC List of Transcarpathian region and provide accommodation for people evacuating from the areas of active hostilities.

In addition, a letter was sent to introduce monthly informing of the representative of the Ombudsman in Transcarpathian region about the measures taken to restore the right of internally displaced persons to free accommodation at the following address: Dubrynychy village, 73 Tsentralna St., Uzhhorod district.

At the same time, by a decision of the Dubrynytsia village council of 14.11.2025, the facility was leased for a three-year term to another organisation with a rent payment. The above circumstances indicated a violation of the requirements of the Law of Ukraine No. 1706-VII of 20.10.2014 "On Ensuring the Rights and Freedoms of Internally Displaced Persons", in particular in terms of ensuring the right of IDPs to access to housing and proper living conditions.

Such actions demonstrate the misuse of international humanitarian aid, undermine the trust of international partners and limit the state's ability to respond to humanitarian challenges under martial law. Based on the results of the measures taken, the Zakarpattia Regional Prosecutor's Office was notified of the possible commission of offences, the information was entered into the Unified Register of Pre-trial Investigations on the grounds of criminal offences under Part 5 of Article 191 and Part 1 of Article 366 of the Criminal Code of Ukraine and a pre-trial investigation was initiated.

5. Observance of citizens' rights to life and security

In 2025, **59 monitoring visits** were carried out to the facilities of the Civil Protection Facilities Fund to assess the possibility of their use as the simplest shelters for the population, and 543 recommendations were issued to the balance holders.

Based on the results of monitoring visits in 2025, 229 recommendations were issued, reflecting the violations identified.

The status of implementation of the recommendations is as follows:

- 134 recommendations (25%) have been implemented;
- 402 recommendations (73%) are in the process of implementation;
- partially implemented - 5 recommendations (1.5%);
- not implemented - 2 recommendations (0.5%).

Thus, 98% of the recommendations are under implementation or have already been implemented, while 2% of the recommendations remain unimplemented, which requires additional control by the state authorities and local self-government bodies.

The monitoring revealed systemic violations, including the lack of proper information about shelters and routes to them, clutter and poor technical condition of

protective structures, as well as their inaccessibility near educational and healthcare facilities or exceeding the standard distance.

This indicates that the local authorities and the regional military administration are not properly exercising their powers to register, maintain and bring shelters into readiness for their intended use.

During the monitoring visit to three civil protection facilities located on the basis of the outpatient, inpatient and rehabilitation departments of the separate subdivision "Clinical Children's Hospital" of the municipal non-profit enterprise "Uzhhorod City Multidisciplinary Clinical Hospital" of the Uzhhorod City Council, violations of the rights of persons in the facility were revealed.

It was established that the shelters had been formally considered fit for use for a long time, which was annually reflected in the inspection reports, but were not actually used.

Thus, the requirements of the Civil Protection Code of Ukraine No. 5403-VI of 02.10.2012, Resolution of the Cabinet of Ministers of Ukraine No. 138 of 10 March 2017 "Some Issues of Using the Objects of the Civil Protection Facilities Fund" and Order of the Ministry of Internal Affairs No. 579 of 09.07.2018, registered with the Ministry of Justice of Ukraine No. 879/32331 of 30.08.2018, were violated.

Only after a monitoring visit and recommendations based on the results of the visit by the local government were two shelters officially declared unusable due to their poor technical and sanitary condition and lack of life support conditions.

At the same time, the shelter at the outpatient department was generally in a condition that allowed its use, but needed to be cleared of clutter, humidity, mould and replenished. Following the recommendations made and the follow-up visit, it was found that some of the recommendations had been implemented, while others were in the process of being implemented.

Once the recommendations are fully implemented, the rights to life and safety of 100 people will be ensured.

6. Observance of the rights of the Roma national minority (community)

During 2025, as part of the parliamentary control, **17** scheduled monitoring visits were conducted to educational institutions of the region and territorial communities of Zakarpattia region, where Roma settlements are located, to assess the state of observance of the rights of the Roma national minority (community).

Based on the results of the monitoring visits in 2025, 136 recommendations were made, reflecting the violations and problematic issues identified.

The status of implementation of the recommendations is as follows:

- 48 recommendations (35%) have been implemented;

- 45 recommendations (33%) are in the process of implementation;
- partially implemented - 23 recommendations (17%);
- not implemented - 22 recommendations (15%).

Thus, 85% of the recommendations are in the process of being implemented or have already been implemented, while 15% of the recommendations remain unimplemented, which requires additional control by the state authorities and local self-government bodies.

The monitoring revealed systemic violations of the rights of the Roma community in the areas of education, social protection, health care, lack of identity documents, and the majority of Roma are not employed.

In general secondary education institutions in Uzhhorod, Mukachevo and Berehove, there is a critical lack of staff. Berehove, there is a critical absence of students from classes. In particular, in Uzhhorod Gymnasium No. 13 of the Uzhhorod City Council, it was found that, with the declared number of students - 237 members of the Roma minority (community), the actual attendance at lessons was only 56 students. At the same time, there are no notes in the electronic journal on the reasons for absences, which is a violation of the Order of the Ministry of Education and Science of Ukraine "On Approval of the Instruction on Keeping Business Records in General Secondary Education Institutions in Electronic Form" No. 707 of 08.08.2022 (hereinafter - Order No. 707), which indicates the lack of effective mechanisms for attracting and retaining children in the education system.

Separate cases of segregation of Roma students in Uzhhorod gymnasiums No. 13 and No. 14, as well as in educational institutions in the villages of Kontsovo and Haloch, were identified. This practice negatively affects the socialisation of children, increases the isolation of the Roma community and contradicts the principles of non-discrimination and equal access to education.

The most pressing violation of rights remains the lack of identity documents for members of the Roma community, which deprives them of protection by the state, the opportunity to exercise basic rights and freedoms, including the right to education, health care, social protection, official employment, registration of residence and access to state and municipal services.

During a monitoring visit to the Roma settlement of the Velykodobronsk village council in Zakarpattia region, the death of a 10-month-old child was revealed. According to the forensic medical expert, the cause of death was bilateral total bronchopneumonia. It was established that the child had not been provided with timely medical care, in particular due to the lack of identity documents. The family of P., in which the child died, was not registered with the service, and, according to the head of the service, it was inappropriate to register the family, as the child had died and there were no other children in the family.

The monitoring group visited the place of residence of P.'s family, where the child died, and found out that the mother had a 7-year-old child in care who did not have any identity documents. The child did not receive medical care and did not attend an educational institution.

The mother provided an explanation for the death of the ten-month-old child. According to her, she worked at a garbage dump in Kremenchuk and did not seek medical attention because she was afraid of possible child deprivation due to the lack of documents. After her death, the child's body was taken to the Velykodobronska community for burial. It is worth noting that the child's first identity document, a birth certificate, was issued two weeks after her death. The child's death did not prompt community officials to register the family in the SCA. The child has not been registered by the service as being in difficult life circumstances, does not attend an educational institution, does not receive medical services, and the community has not carried out a needs assessment or provided social services.

According to the response of the Transcarpathian Regional Prosecutor's Office to the letter of the Ombudsperson's representative, it became known that the prosecutor had initiated criminal proceedings under part 1 of Article 115 of the Criminal Code of Ukraine against the child's mother. According to the recommendations provided by the Ombudsman's representative, the Velykodobronske village council decided to

Provide social support and social services to the family.

*During the monitoring visit to the village of Kontsovo of the Kholmky village council, the Ombudsman's representative discovered the death of a one-year-old child in the family of D. According to the forensic expert, the cause of death **was** bilateral focal pneumonia, which occurred as a result of failure to provide the necessary medical care. It was established that D.'s family had three young children who did not have identity documents. During the visit, it was found that the community had not assessed the needs and level of safety of children, and had not provided any social services, which indicates the inactivity of the children's service of the Kholmky village council and the Centre for Social Services of the Kholmky village council.*

In order to take measures to ensure the best interests of children, as well as to preserve their life and health, the Ombudsman's representative sent response letters to the Kholmky village council, the Main Department of the National Police in the Zakarpattia region and the Zakarpattia Regional Prosecutor's Office.

The Uzhhorod Police Investigation Department registered the death in the URPI on the grounds of a criminal offence under Part 1 of Article 115 of the Criminal Code of Ukraine. However, during the pre-trial investigation, the investigator decided to close the criminal proceedings.

According to a letter from the Ombudsman's representative to the Zakarpattia Regional Prosecutor's Office, in order to determine the grounds for closing the criminal proceedings, the Zakarpattia Regional Prosecutor's Office cancelled the decision to close and entered information into the URPI against the mother, citizen D., under Article 166 of the Criminal Code of Ukraine. Based on

the results of the pre-trial investigation, the indictment against citizen D. was sent to court.

During the monitoring visits, systemic violations of the right of members of the Roma national minority (community) to access safe and clean drinking water in places of their compact residence were identified. This problem is long-lasting, repeated in different territorial communities and indicates that local governments do not properly fulfil their responsibilities in ensuring basic social human rights.

At the same time, in places of compact residence of representatives of the Roma community:

- There is no centralised water supply or it is partially functioning;
- The available water sources (columns, wells, temporary connections) do not meet sanitary and hygienic requirements;
- access to water is limited, seasonal or dangerous.

During the monitoring visit to the Roma settlement in the village of Kontsovo of the Kholmivska territorial community, violations of the human right to an adequate standard of living and decent living conditions were identified, including lack of access to clean drinking water. The settlement had no centralised water supply for a long time, and residents were forced to use alternative sources of water that did not meet sanitary and hygienic requirements, which posed health risks, especially for children and other vulnerable groups. Based on the results of the monitoring visit, the Ombudsman provided recommendations to the Kholmky village council to eliminate the identified violations and ensure access to clean drinking water for the residents of the settlement.

To implement the Commissioner's recommendations, the community allocated funds in the amount of UAH 678,875 and installed a water supply system in the Roma settlement, which allowed 590 people living in the settlement to restore their violated rights to access to clean drinking water.

6. Observance of women's rights to healthcare and medical care during pregnancy and childbirth

In 2025, 6 monitoring visits were carried out to the Perinatal Centre and maternity departments of healthcare facilities in Zakarpattia region to ensure that women's rights to healthcare and medical care during pregnancy and childbirth are respected.

Based on the results of the monitoring visits, 47 recommendations were made, reflecting the identified violations and problematic issues.

The status of implementation of the recommendations is as follows:

- 27 recommendations (57%) have been implemented;
- 10 recommendations are in the process of implementation (21%);

- partially implemented - 5 recommendations (11%);
- not implemented - 5 recommendations (11%).

Thus, 89% of the recommendations are under implementation or have already been implemented, while 11% of the recommendations remain unimplemented, which requires additional control by the state authorities and local self-government bodies.

The monitoring findings revealed systemic violations of the rights of pregnant women and women in labour. These include inadequate information to patients, lack of safe and appropriate conditions for medical care, non-compliance with medical record keeping standards, and restrictions on access to free medical services guaranteed by the state.

In maternity wards, women were not informed that examinations, medical care and childbirth are paid for by the state under the Medical Guarantee Programme, nor were patients informed of their right to receive financial compensation instead of a 'baby package'. In two healthcare facilities, in particular, the Rakhiv District Hospital of the Rakhiv City Council of Zakarpattia Oblast and the Municipal Healthcare Institution Mizhhiria District Hospital of the Mizhhiria Village Council of Zakarpattia Oblast, there were no operating rooms at all, which made it impossible to provide timely and safe medical care in case of complications and posed a direct threat to the lives and health of women and newborns.

The identified violations indicate inadequate organisation of medical care during pregnancy and childbirth, disregard for patients' rights and require an immediate response from the healthcare authorities.

During the monitoring visit to the maternity ward of the Rakhiv District Hospital of the Rakhiv City Council (hereinafter - the ward), violations of women's rights to health care and medical care during pregnancy and childbirth were revealed, which posed a real threat to the life and health of women in labour and newborns.

During a confidential communication, citizen K. reported inadequate conditions of medical care, which did not provide for a timely response in the event of a complicated delivery. In particular, medical care was provided in the absence of direct access to the operating unit, which made it impossible to carry out emergency obstetric interventions, including caesarean section, in case of medical indications.

Such circumstances indicated a violation of the requirements for the timeliness and continuity of medical care, which led to the loss of critical time and created increased risks to the life and health of women and newborns, including the risk of infectious complications. In fact, the provision of medical care was formal and did not meet safety standards.

The monitoring found that the maternity unit did not have an operating unit with a designated operating room for scheduled and emergency surgical interventions, including emergency obstetric care, which is a prerequisite in accordance with the requirements of the package of medical services for medical care at childbirth financed under the Medical Guarantees Programme.

According to the head of the maternity ward, the operating unit was located in another building - in the premises of the surgical department, which actually meant that the CNE did not have safe conditions for emergency obstetric care. This violation was systemic and lasted for more than 30 years, during which women's rights to safe and dignified childbirth were not properly ensured.

Following the Ombudsman's recommendations, the Rakhiv City Council of Zakarpattia Oblast allocated UAH 1,573,886 and equipped an operating unit in the maternity ward of the CNP, and the necessary medical equipment is expected to be received.

The violations identified during the monitoring indicate systemic inaction and improper performance of official duties by the responsible officials of the healthcare facility, which leads to the formation of a persistent negative and stereotypical perception among Ukrainian citizens about the impossibility of receiving free, safe and decent medical services during pregnancy and childbirth.

RECOMMENDATIONS:

In 2026, the Main Department of the National Social Service in Zakarpattia Oblast should carry out state supervision (control) in all territorial communities of Zakarpattia Oblast over

Compliance with the requirements of the legislation in the field of child protection, in particular in children's services and social service providers to families and children (social service centres, social services, territorial centres of social services (social services)). Inform the Commissioner on the results of the state supervision (control), providing copies of acts and other inspection materials by the 25th day of each month;

compliance with the requirements of the law in the provision of social support and observance of children's rights, taking into account the goals and objectives of the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028, approved by the Cabinet of Ministers of Ukraine on 26.11.2024 No. 1201-p. and inform the Commissioner of the results of the state supervision (control) with copies of acts and other inspection materials by 01.08.2026 and 31.12.2026;

interagency cooperation, on the part of children's services and social service centres / social service centres and interagency cooperation of entities preventing and combating domestic violence, in order to prevent violations of the rights of children and their families to receive adequate social protection and ensure their social support, basic social services and, based on the results of state supervision (control), to inform the Commissioner with copies of acts and other inspection materials by the 25th day of each month;

observance of the rights of children to health improvement and recreation in all health camps of the Zakarpattia region and inform the Commissioner on the results of the

state supervision (control) with copies of the acts and other inspection materials by 01.08.2026 and 31.12.2026.

The Transcarpathian Regional State Administration and the Regional Military Administration shall ensure:

Providing local self-government bodies of Zakarpattia region, within their powers, with practical, methodological and advisory assistance in addressing issues related to social protection of children and the activities of local services for children (hereinafter referred to as the service) and social service providers, in particular, in identifying and responding to cases of difficult life circumstances, threats to children's lives and health, and domestic violence. To inform the Commissioner on the implementation of the recommendation about the measures taken and supporting documents, indicating the services that received assistance, by the 25th of each month.

To include in the List of temporary accommodation places in Zakarpattia region the premises created or equipped with international assistance for temporary accommodation of internally displaced persons located at the following addresses: Uzhhorod district, Dubrynychy village, 60 Bereh Street, and Durynychy village, 73 Tsentralna Street, for the persons. Provide free accommodation for internally displaced persons in the above-mentioned premises, as well as in the premises at the following address: Uzhhorod district, Chertezh village, 37 Myr Street, who are evacuated from the areas of active hostilities and inform the Ombudsman by 01.06.2026.

The Transcarpathian Regional State Administration, the Regional Military Administration together with the local self-government bodies on the territory of which the places of temporary residence of IDPs are located shall ensure

Conduct on-site monitoring visits to all places of temporary residence of internally displaced persons included in the ICC List of Transcarpathian region in order to collect and analyse data in accordance with the checklist for monitoring the condition and arrangement of ICCs provided for in the Procedure for the functioning of temporary residence places of IDPs, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930. Take measures to eliminate the identified violations of the minimum requirements for the life support of internally displaced persons and inform the Ombudsman about the results of the visits, indicating the number of visits conducted, violations identified and eliminated by 31.12.2026;

Bedevlyanska, Velykodobronska, Vilkhovetska, Kostrynska, Onokivska, Polyanska, Kholmkiivska rural, Bativska, Velykyi Bereznyi, Dubivska, Kolchynska, Mizhhirska, Serednyanska, settlement, Berehivska, Vynohradivska, Perechynska, Chopska urban territorial communities), to ensure

bringing the staffing level of children's services in line with Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" in order to respond appropriately and effectively to cases of violation of children's rights

and protect their best interests, and inform the Commissioner on the implementation of the recommendation by 01.08.2026.

to develop, approve and implement local programmes for the protection of children's rights, prevention of violence and social orphanhood, with the definition of specific goals, measures, responsible executors, sources of funding and control mechanisms, and to inform the Commissioner about the results of the work done by 01.08.2026.

placement of orphans and children deprived of parental care, who are on the primary register of children's services, in family and close to family forms of upbringing and inform the Commissioner about the results of the work done by 31.12.2026.

Velykoluchky, Velyky Berezny, Horondivka, Ivanovo, Koson, Nelipyno, Pyiterfolva village and Baty, Chynadiyevo settlement territorial communities of the Zakarpattia Oblast shall ensure

Establishment and functioning of a communal social service provider, in accordance with the requirements of the Law of Ukraine "On Social Services" in order to ensure proper organisation and accessibility of basic social services for community residents, especially children, families with children, persons in difficult life circumstances, internally displaced persons and other vulnerable categories of the population, for the proper exercise of powers by local self-government bodies in the field of social protection of the population and to inform the Ombudsman's Office about the results of the work done

Local governments to ensure:

publishing and updating information on official websites in accordance with the requirements of Article 15 of the Law of Ukraine "On Access to Public Information".

The Main Department of the State Emergency Service of Ukraine in Transcarpathian region:

to organise and conduct inspections of the state of readiness of 2321 civil protection structures in the territory of Zakarpattia region with the preparation of relevant acts and taking response measures in case of violations and inform the Commissioner about the results of the work carried out, indicating the number of inspected structures, acts drawn up, violations detected, response measures taken and deficiencies eliminated by the 25th of each month.

Western Interregional Department of the National Health Service of Ukraine:

to monitor the fulfilment of the terms of contracts for medical services under the programme of medical guarantees by healthcare institutions in Zakarpattia region in order to ensure the rights of children, pregnant women and women in labour to healthcare and medical care and to inform the Commissioner by 31.12.2026.

11.8. Zaporizhzhia Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **3,917** appeals from Zaporizhzhia region, containing **4,410** reports of rights violations. The categories of the most violated rights include: civil rights - **3,078** reports, social rights - **451** reports, economic rights - **260** reports, personal rights - **175** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	1 307	2 839	3 117	3 917
Reports of rights violations	1 669	3 438	3 477	4 410

The full-scale armed aggression of the Russian Federation has significantly transformed the humanitarian and human rights situation in Zaporizhzhia region, which from the first months of the war was among the regions directly affected by the hostilities, partial occupation and large-scale displacement of the population. The combination of the frontline location, constant security threats and the prolonged occupation of certain territories has created difficult conditions for the realisation and protection of fundamental human rights.

Out of 67 communities in Zaporizhzhia region, 7 communities are involved in hostilities, and 43 communities are temporarily occupied. Cities of regional significance are under temporary occupation: Melitopol, Berdiansk, Tokmak and Enerhodar.

At the same time, the communities that remain under Ukrainian control are systematically subjected to missile, artillery and drone attacks, which leads to the destruction of housing, social infrastructure and critical life support systems.

In this context, the activities of state authorities, local governments, human rights institutions and civil society are of key importance. Their effective and coordinated work is crucial not only for responding to existing human rights violations, but also for developing systemic mechanisms for preventing them, strengthening community resilience and ensuring an adequate level of protection for the population in the face of a prolonged military threat.

Monitoring visits/on-site inspections

In 2025, the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Zaporizhzhia region conducted **154** monitoring visits, including **6** remote visits. Each of them became an element of systematic work on human rights observance in the conditions of martial law and constant security challenges.

One of the key priorities of the monitoring activities is to ensure the observance of the human right to security and the proper functioning of civil defence structures. As part of this area of work, **43** monitoring visits were conducted to check the state of maintenance and readiness of shelters, radiation shelters and dual-purpose facilities. The focus is on the real ability of these facilities to protect people's lives and health at a critical moment.

A special and consistent emphasis in the work of the office is placed on the protection of children's rights. In order to respond in a timely manner and prevent possible violations in this area, **42** monitoring visits to specialised institutions and establishments were conducted, including **8** educational institutions, where compliance with the standards of a safe educational environment was assessed.

As part of the activities aimed at protecting the rights of persons affected by the armed aggression against Ukraine, **26** monitoring visits were made to places of temporary residence of internally displaced persons. Particular attention was paid to the facilities with the lowest level of implementation of the Ombudsman's recommendations, as well as unscheduled visits at the request of internally displaced persons themselves - where the problem required immediate intervention.

Acting as a national preventive mechanism, the regional office monitored the observance of human rights in conditions of restricted freedom. In 2025, **13** visits were made to places of detention in Zaporizhzhia region to assess the conditions of detention and observance of basic rights and guarantees.

Also, during the year, monitoring observations of the observance of procedural rights of participants in court proceedings continued. The Ombudsman's Office attended **11** court hearings.

Protection of the right to education for applicants from the temporarily occupied territories remains a separate area of work. In 2025, the activities of the educational centres "Crimea-Ukraine" and "Donbas-Ukraine", which operate on the basis of Zaporizhzhia National University, Zaporizhzhia Polytechnic National University and Zaporizhzhia State Medical and Pharmaceutical University, were monitored.

In addition, monitoring visits were made to educational centres based at relocated higher education institutions, such as Berdiansk State Pedagogical University, Bohdan Khmelnytsky Melitopol State Pedagogical University and Dmytro Motornyi Tavria State Agrotechnological University.

Educational activities

In 2025, the Ombudsman's Office in Zaporizhzhia region organised and implemented **87** awareness-raising events covering a wide range of target audiences: civil servants and local government officials, representatives of civil society institutions, law enforcement officers, children, internally displaced persons, persons with disabilities and other vulnerable groups.

The main focus of the awareness-raising activities was on the most sensitive and popular issues, in particular: the exercise of the right to appeal and access to public information, prevention of ill-treatment and torture in law enforcement, ensuring children's rights, and guarantees of the right to work. The total number of participants and listeners was **2,098**, which demonstrates the high public demand for legal education even in times of military challenges.

Work with children and young people was an important area. At the initiative of the Ombudsperson's Office in Zaporizhzhia region and within the framework of the Swiss-Ukrainian project DECIDE, 35 lessons on children's rights in wartime were held in 2025 together with educational institutions of Zaporizhzhia.

For the first time in the region, the practice of conducting an educational lecture for police cadets of higher education institutions who are undergoing training in police units in Zaporizhzhia region was introduced. The topic of human rights in policing became a key component of this class and laid the groundwork for the formation of a new professional culture of law enforcement - a culture of service to people and respect for their dignity.

In December 2025, the School Ombudsman project was launched, which has become a vivid example of the introduction of innovative approaches to legal education. In **11** educational institutions of Zaporizhzhia city and **6** educational institutions of Zaporizhzhia district, the first school ombudsmen were elected and started their activities - students who became the leaders of human rights ideas in their schools.

As part of cooperation with higher education institutions, the practice of guest lectures was launched and successfully implemented, with two thematic educational events for students of Zaporizhzhia National University and Zaporizhzhia Polytechnic National University held in 2025.

Special attention is paid to the development of social partnership. Together with the regional council of trade unions and sectoral trade unions, four events were held to protect labour rights and strengthen the dialogue between employees, employers and the state.

In order to increase the level of professional responsibility of police officers and strengthen compliance with human rights and freedoms standards, a human rights awareness event was held with the participation of educational security officers and human rights inspectors of the National Police in Zaporizhzhia Oblast, during which the focus was on preventing possible human rights violations at the early stages of their occurrence.

A separate and extremely sensitive area of communication was the ongoing interaction with family members of prisoners of war and persons who went missing under special circumstances. In 2025, the Ombudsman's Office in Zaporizhzhia region organised and participated in **11** meetings, which were attended by a total of **507** family members and relatives of servicemen.

The main issues addressed by the Ombudsperson's Office were:

- Protection of children's rights;

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of victims of armed aggression against Ukraine;
- protecting the information rights of citizens;
- ensuring the observance of the rights of citizens to safety, accessibility and proper condition of shelters and protective structures under martial law;
- observance of the rights of persons in places of detention;
- protection of the right to a safe environment.

1. Protection of children's rights.

During the reporting period, the team of the Regional Office of the Ukrainian Parliamentary Commissioner for Human Rights in Zaporizhzhia region conducted **42** monitoring visits as part of the parliamentary control over the observance of children's rights. These visits covered **8** educational institutions, **3** healthcare institutions, **4** social service centres, **2** special secondary schools and **25** children's services.

The monitoring activities were aimed at assessing the actual state of children's rights under martial law, identifying systemic problems in the activities of relevant institutions and bodies, and determining the level of compliance of their activities with the requirements of national legislation and international standards in the field of child protection.

The visits revealed the existence of systemic problems in the activities of services for children relocated from the temporarily occupied territories of territorial communities. In particular, a number of systemic shortcomings and violations were identified during **20** monitoring visits to these children's services that negatively affect the proper provision and protection of the rights of children in difficult life circumstances.

In particular, the following systemic problems and violations of children's rights were identified:

1. Violation of the principle of preserving the integrity of family groups. There were **4** cases of separation of siblings during placement in family or institutional care without proper justification.

2. Improper maintenance of personal files and records. In the **11** relocated services for children, widespread problems were identified with the loss of documentation during evacuation, incomplete data recovery, improper maintenance of primary registration books, lack of certified copies of documents and general disorganisation of files.

3. Late or incomplete data entry into the Unified Information and Analytical System (UIS) "Children". **8** monitoring visits confirmed the facts of only partial entry of information into the electronic database, which made it difficult or impossible to restore data after the evacuation.

4. During the monitoring of **11** services for children, it was found that there was a lack of proper monitoring of living conditions, children's needs, irrelevance of their status, and untimely updating of individual plans.

5. Restriction of access to services for citizens (lack of information). In the locations of **3** services, there is no accessible information on work schedules, reception hours and contact details.

In May 2025, the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Zaporizhzhia region conducted a monitoring visit to the relocated Service for Children of the Executive Committee of the Berdiansk City Council. The main purpose of the event was to check the state of observance of children's rights and freedoms under martial law and to assess the effectiveness of the institution's work after it was relocated from the temporarily occupied territory.

During the inspection, the monitoring group identified a number of shortcomings that posed risks to the proper protection of children's rights. In particular, the status of the relocated service needed to be regulated by law, there was no public information on the reception schedule and contacts for citizens, children's personal files and primary registration books were kept with violations, and control over children in care abroad or in the temporarily occupied territories was insufficient.

Following the visit, clear recommendations were made to the military administration and the Head of the Service for Children's Affairs to address the identified violations. The main requirements were to approve the Service's regulations, streamline paper and electronic document flow, strengthen monitoring of data on vulnerable children and ensure unimpeded access to the Service's services.

The Children's Service has fully implemented the recommendations and officially reported on them in July 2025. The institution has developed and approved the necessary Regulations, streamlined children's personal files in accordance with regulatory requirements, and published contact details and working hours for the public.

The implementation of these recommendations has led to the actual restoration and ensuring of the rights of children in the Berdiansk community to proper social and legal protection. Due to the enhanced control, restoration of communication with families in difficult life circumstances and the full resumption of the Service, orphans and children deprived of parental care received guarantees of continuous support and protection of their interests by the state, regardless of their current location.

As part of the parliamentary control over the observance of constitutional human and civil rights and freedoms, including the right of a child to a safe educational environment, in October 2025, the Office of the Ukrainian Parliament Commissioner for Human Rights in Zaporizhzhia region conducted a series of targeted monitoring visits to **8** general secondary education institutions in Zaporizhzhia.

The purpose of these visits was to establish the actual state of observance of children's rights to safe learning conditions, to assess the compliance of the educational environment with the requirements of current legislation under the legal regime of martial

law, as well as to check the availability and proper functioning of civil protection structures (shelters) and to ensure proper medical and psychological support for students.

Based on the results of the monitoring activities, it was established that in some educational institutions there are violations of children's right to a safe and accessible educational environment, which are systemic and required an appropriate response from the Ombudsman's Office in Zaporizhzhia region, in particular

1. Violation of legislation in the field of licensing of educational activities. It was established that at the time of the monitoring visits, **7** educational institutions did not have updated licences issued after the change of their type or name. Late renewal of licences is a violation of the requirements of part six of Article 45 of the Law of Ukraine "On Complete General Secondary Education", which calls into question the legal purity of the process of providing educational services.

2. The monitoring revealed significant shortcomings in the organisation of medical care. In particular, in **2** educational institutions, the presence of expired medicines was recorded, which is a gross failure to comply with sanitary and hygienic standards and poses a real threat to the lives of children. Inadequate control over the activities of infirmaries was also recorded in **3** educational institutions.

3. Failure to comply with barrier-free and accessibility requirements (right to inclusion). Despite the fact that Zaporizhzhia is classified as a possible hostilities area, where access to protective structures is vital, shelters in **4** educational institutions are not adapted to the needs of persons with disabilities and other low-mobility groups (no ramps, handrails, or standard width of doorways).

4. Violation of the right to information. In all the inspected institutions, the requirements of Article 30 of the Law of Ukraine "On Education" were not fully implemented. Incomplete or outdated information was published on official websites, which restricts the right of parents and the public to access socially important information.

In February 2025, as part of the parliamentary control over the observance of human and civil rights and freedoms, the regional office of the Ukrainian Parliament Commissioner for Human Rights in Zaporizhzhia region conducted a scheduled monitoring visit to the municipal institution "Zaporizhzhia Special Boarding School "Orientir" of the Zaporizhzhia Regional Council. The purpose of the visit was to verify compliance with the requirements of the current legislation on the protection of children's rights, as well as to assess the safety conditions of their stay under the legal regime of martial law.

During the monitoring, the group found a number of instances of non-compliance with regulatory requirements that led to violations of the rights of children with special educational needs. In particular, violations of the requirements for architectural accessibility of the facility were recorded - the absence of information signs in Braille in key functional areas. In addition, non-compliance with sanitary and epidemiological standards in the food unit (lack of product labelling, violation of storage conditions) and the absence of original medical documents confirming the passage of a separate medical examination (fluorography) were revealed. The unacceptable fact that the educational space was organised in a

sanitary room (shower room), which directly contradicts state sanitary standards and rules for the maintenance of educational institutions, was also documented.

Based on the results of the monitoring visit, a report was drawn up, and the management of the institution was provided with clear recommendations aimed at eliminating the identified violations of the law. The Ombudsman's representative's requirements included the need to bring the premises in line with inclusivity standards (installation of Braille signs), strict compliance with sanitary regulations at the food unit, strengthening control over staff medical records, and immediate relocation of the classroom from the shower room to a room suitable for its intended purpose.

The administration of the institution responded to the identified violations and took the necessary measures to implement the recommendations, in particular

- Braille signs were produced and placed in key functional areas of the institution - near classrooms, sanitary rooms and emergency exits:

- internal control was strengthened at the food unit and explanatory work was carried out with the staff under the threat of disciplinary liability;

- a medical worker is obliged to strictly control the availability of original medical documents;

- measures were taken to relocate the classroom in the shower room and repair work was started in the shelter to arrange proper educational facilities before the start of the new school year.

The implementation of these recommendations ensured the actual restoration of the rights of pupils of the special boarding school to a safe, accessible and healthy educational environment. Eliminating epidemiological risks, ensuring conditions for free spatial orientation of children with visual impairments and stopping the practice of holding classes in unsuitable sanitary facilities guaranteed the observance of children's right to respect for their dignity and proper conditions for receiving education, in accordance with national legislation and international standards.

Based on the results of the monitoring visits, **160** recommendations were made to state authorities, local governments, educational institutions and services for children. Of the recommendations provided, **97** were implemented; **59** are in the process of being implemented; and **4** were not implemented.

Protecting the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances;

In 2025, the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Zaporizhzhia region paid special attention to ensuring the observance of the rights of servicemen, war veterans and family members of persons who went missing under special circumstances.

The relevance of this area is due to the security situation in the region, which remains frontline, with a significant number of military personnel serving in the region,

as well as a large number of military families waiting for information about the fate of their loved ones.

During the reporting period, the Ombudsman's Office in Zaporizhzhia region received **164** appeals on observance of the rights of servicemen, veterans and their families.

One of the problematic issues that the Ombudsman's Office has been working on is consideration of appeals from families of prisoners of war and missing persons, which are received by the territorial recruitment and social support centres (TSC and SS). For such families, an appeal is often the only channel for obtaining information about the fate of a loved one, the procedure for searching, status registration, social guarantees and state support mechanisms. The response of the CCC and SP determines whether they will be able to exercise their right to information, social protection, legal certainty and decent treatment by the state.

The Ombudsman was approached by the mother of a serviceman who went missing under special circumstances, regarding the violation of her right to appeal and information by the command of one of the military units.

On 26.05.2025 and 26.08.2025, the applicant applied to the Central Joint District Territorial Centre for Recruitment and Social Support with applications for a copy of the official investigation report and, at the same time, with applications for the appointment of the relevant payments. The applicant received no response to her applications.

As part of the consideration of the appeal, the Ombudsman's Office sent a letter to the Zaporizhzhia Regional Territorial Centre for Recruitment and Social Support (hereinafter - Zaporizhzhia RTC&S) with a request to consider the applicant's appeal and provide a comprehensive response.

In its response, the Zaporizhzhia Regional Recruiting and Social Support Centre informed that the applicant's appeal had been forwarded to the relevant military unit via the electronic document management system, and as of the date of the Ombudsman's response, the military unit had not received any information on the results of its consideration.

In order to restore the applicant's right to consider her appeals and receive a response, a decision was made to initiate proceedings and a letter was sent to the Command of the Land Forces of the Armed Forces of Ukraine. As a result of the review, a letter with attachments was received informing the applicant of the consideration of the appeals, provision of the requested information, and explaining the procedure for further settlement of the issues raised.

Ensuring the social rights of servicemen at the level of local self-government is one of the key aspects of maintaining the state's defence capability. However, the imposition of territorial or departmental restrictions by local authorities (e.g., tying them to a specific territorial recruitment centre) creates artificial barriers. This leads to discrimination against residents of the same community who perform the same constitutional duty but were drafted by different bodies. Eliminating such discrepancies ensures compliance with

the principle of equality and fairness in the provision of social guarantees to the Defenders of Ukraine.

During a personal reception of citizens held by the Ombudsman's representative in January 2025 in the city of Vilnyansk, Zaporizhzhia district, information was received about a possible violation of the principle of equality and violation of the rights of mobilised servicemen from the Vilnyansk city territorial community to support from the local government. The main problem was the establishment of a discriminatory criterion for receiving one-time financial assistance. According to the initial version of the Programme (decision No. 8 of 14.11.2024), only those community residents who were called up for service exclusively through the First Department of the Zaporizhzhia District Military and Civilian Personnel Committee and JV were eligible for .

This created unequal conditions for the defenders - residents of the Vilnia community who were called up by other MCCs (for example, at their place of work in Zaporizhzhia or other cities), changed their place of registration immediately before mobilisation, had documentary evidence of service, but were not mobilised through the specific territorial centre specified in the programme.

The Ombudsman's representative sent a request to the city council to provide justification for the restrictions and statistics on the programme implementation.

In response, the council informed that only 20 out of 27 applicants had received assistance during the programme period. At the same time, 7 applications (or 26% of the total number) were not satisfied or were in the status of consideration precisely because they did not meet the formal criteria of the Procedure (in particular, because they were not recruited by the proper TCC). The statistics confirmed that the procedural requirement has become a real obstacle for defence counsels.

After the intervention of the Ombudsman's representative, the Executive Committee of the Vilna City Council approved the draft amendments to the Programme.

Key changes that solved the problem:

- Removal of the link to a specific MCC: the requirement for mandatory conscription by the "First Department of the Zaporizhzhia District MCC" was removed from the text of the Procedure and the application form;

- expansion of the range of subjects: the new version allows all persons called up during mobilisation to the Armed Forces of Ukraine and other military formations to receive assistance, regardless of the body that carried out the call-up;

- emphasis on resident status: the main criteria are the fact of registration/residence in the community and the fact of call-up for service, which fully meets the goal of social support for defenders of Ukraine.

Thus, all mobilised community residents are now eligible for the payment, regardless of their place of call-up. This allowed us to restore the right to social protection for those whose applications were previously blocked on formal grounds

and to ensure an equal approach to all representatives of the Vilnyanska urban territorial community who are in the Armed Forces of Ukraine.

In order to strengthen the protection of the rights of war veterans and increase the effectiveness of interagency cooperation in Zaporizhzhia region, in November 2025, a representative of the Ukrainian Parliament Commissioner for Human Rights held an extended working meeting with specialists in supporting war veterans and demobilised persons who operate in the region's territorial communities.

The meeting was attended by the leadership of the Veterans' Policy Department of the Zaporizhzhia Regional State Administration and **72** people, including specialists from veterans' support and employees of local government departments on veterans' policy.

In the context of the ongoing armed aggression against Ukraine and given the security situation in the frontline region, an important component of the activities of the Ombudsman's Office in Zaporizhzhia region is systematic communication and support for the families of prisoners of war, fallen and missing defenders of Ukraine.

During 2025, the Office in Zaporizhzhia region organised and participated in **11** coordination meetings with families of the defenders of Ukraine. Representatives of the regional working group of the Coordination Headquarters for the Treatment of Prisoners of War, the Commissioner for Persons Missing in Special Circumstances, military units of the Armed Forces of Ukraine, the National Guard of Ukraine, territorial recruitment and social support centres, the National Police of Ukraine, the Security Service of Ukraine, the Zaporizhzhia Research and Development Centre of the Ministry of Internal Affairs of Ukraine, the Pension Fund of Ukraine, the International Committee of the Red Cross, and other relevant specialists took part in the meetings.

In total, **507** family members of Ukraine's defence personnel from Zaporizhzhia region took part in such meetings in 2025, which allowed for direct dialogue with government agencies, obtaining the necessary advice on social, legal and procedural support, and promptly responding to problematic issues faced by military families.

3. Protection of the rights of victims of armed aggression against Ukraine

Taking into account the frontline status of Zaporizhzhia region, in 2025 the region remained one of the key humanitarian outposts of Ukraine. Zaporizhzhia continued to serve as a safe haven for people who were forced to flee their homes due to the hostilities and occupation of the territories of Donetsk and Kherson regions and the temporarily occupied districts of Zaporizhzhia region.

Internally displaced persons have become one of the most vulnerable categories of the population, requiring not only social assistance, but also systematic legal support and monitoring of compliance with the standards of a decent life.

One of the key areas of work of the Ombudsperson's Office in 2025 was to ensure continuous monitoring of the observance of the right of internally displaced persons to decent living conditions in places of temporary residence. The team of the Regional Office of the Ombudsman in Zaporizhzhia region conducted **26** monitoring visits to

temporary accommodation facilities and provided **112** recommendations on observance of the rights of internally displaced persons.

The lack of regulatory framework and the establishment of a minimum allowable rent for such facilities remains an urgent issue in the development of the system of temporary accommodation. Despite the systematic work of the Ombudsman in this area, the implementation of the relevant recommendation has not lost its relevance and remains the focus of the regional office.

The introduction of a single transit centre has had a positive impact on the issue of initial settlement of evacuees to places of temporary residence. At the same time, cases requiring relocation or change of temporary residence due to life circumstances, living conditions or other objective factors remain problematic.

Thus, during the monitoring visits to **4** places of temporary residence, internally displaced persons raised the issue of the possibility of changing their place of residence, returning to their original place of temporary residence, and clarification of guarantees and opportunities for settlement in places of temporary residence in case of leaving them.

Thus, in view of the above, the issue of developing an accessible, understandable and informative mechanism that would ensure the effective resolution of the issues of resettlement of persons living in places of temporary residence, taking into account their needs and rights, remains relevant.

A special emphasis of the monitoring work was placed on inspecting modular towns, dormitories, boarding houses, municipal and private institutions where evacuees lived, in order to prevent human rights violations, respond to problems in a timely manner and involve the authorities in their solution.

The Ombudsman received a collective appeal from IDPs - residents of the Pectoral boarding house located in Zaporizhzhia city - to ensure the right to proper living conditions, in particular, to restore electricity in the place of temporary residence.

Thus, according to the applicants, for reasons unknown to them, the said boarding house was disconnected from electricity supply, without taking into account the actual residence of internally displaced persons and the presence of a certain status of a place of temporary residence.

Taking into account the winter period and the need for a prompt response, the Ombudsman's representative in Zaporizhzhia region organised an unscheduled monitoring visit to the said place of temporary residence of IDPs, and involved representatives of local authorities, the balance holder of the boarding house and the service provider in resolving the situation.

Following the response of the Ombudsman's representative and the explanatory work carried out, the supplier restored electricity supply to the boarding house on the same day, thereby restoring the rights of 73 IDPs to decent living conditions.

At the same time, the unscheduled visit also revealed problematic issues related to the provision of additional household appliances, Internet connection, logistical issues, barrier-free access and use of sanitary facilities.

Based on the results of the monitoring visit, a report was sent to the Zaporizhzhia Regional Military Administration and the ICC management.

The Zaporizhzhia Regional Military Administration informed that it was considering the issue of providing additional household appliances for the boarding house and resolving the problematic issue of Internet connection. However, the recommendations to ensure barrier-free access to sanitary and hygiene rooms and logistical problems of access to the boarding house are still being implemented.

The status of their implementation is under control of the Ombudsman's Office in Zaporizhzhia region.

The main task in the area of IDP protection is to overcome systemic barriers that impede access to social protection, medical care, education, employment, housing and other basic guarantees provided by the legislation of Ukraine and international human rights standards. Particular attention is paid to the most vulnerable categories of people, in particular those who, after release from prison, medical or other closed institutions, need comprehensive support and assistance.

The Ombudsman received an appeal from citizen B., who was denied an IDP certificate.

According to the applicant, the grounds for the refusal were the circumstances of his serving his sentence at the time of the full-scale invasion, as well as the lack of properly confirmed information about his residence in the temporarily occupied territory of Zaporizhzhia region.

In order to clarify all the circumstances, the Ombudsman's Office in Zaporizhzhia region sent official inquiries to a number of authorities and institutions.

In the course of processing the appeal, it was established that the verdict of the Melitopol City District Court of Zaporizhzhia region of 31.07.2019 contained no information on the applicant's place of registration and residence. At the same time, information was received that on 06.11.2024 the applicant was released on parole on the basis of a decision of the Manevychi District Court of Volyn Region of 30.10.2024 in accordance with Article 81 of the Criminal Code of Ukraine, taking into account part of the unexpired sentence.

In addition, according to the results of separate information received from Manevychi Penal Colony No. 42, it was confirmed that the applicant was registered at an address in one of the settlements of Zaporizhzhia region, which is currently temporarily occupied.

Taking into account these circumstances, the representative of the Ombudsman in Zaporizhzhia region sent an additional request to the Department of Social Protection of the Zaporizhzhia City Council with a recommendation to reconsider the issue of issuing the applicant a certificate of registration of an internally displaced person.

After reviewing the letter of the Ombudsman's representative and the applicant's resubmitted documents, the Department decided to issue the applicant with the relevant certificate, which enabled him to exercise the rights and guarantees provided by law for internally displaced persons.

Through interagency cooperation, responding to citizens' appeals, monitoring the activities of the authorities and individual approach to each situation, the Ombudsman's

Office in Zaporizhzhia region ensures restoration of violated rights of IDPs and promotes the formation of an effective mechanism of their protection that meets the principles of non-discrimination, equality and human dignity.

The Regional Representative Office of the Ombudsman in Zaporizhzhia region received information from social networks about a gross violation of the rights of residents of the ICC at 18 Steshenko Street, Zaporizhzhia, regarding unjustified overcharging for utilities by residents of this ICC.

As part of the response to the information received, taking into account the fact of overstatement of the cost of utilities consumed in the said place of temporary residence, the representative of the Commissioner in Zaporizhzhia region immediately sent a request to the Zaporizhzhia City Council to provide specific clarifications on the requirements of the law, to consider the issue of responsibility of officials and the need to urgently review the established living conditions in the said place of temporary residence.

At the same time, the Zaporizhzhia City Council conducted an audit of the validity of electricity bills, which found that the residents had been erroneously billed based on 1.5 months of data, which led to a sharp increase in the amount to be paid. We also disciplinary action was taken against the responsible persons and management measures were taken to eliminate the violations.

In addition, a meeting was organised between the residents of the modular housing estate and representatives of the utility company to reduce social tension and develop a transparent mechanism for accounting for utility consumption. A mechanism for equal treatment of all categories of IDPs, regardless of the date of displacement, was also introduced by concluding agreements on reimbursement of utility costs and applying Resolution of the Cabinet of Ministers of Ukraine No. 261, as amended by Resolution No. 1045, which allows for compensation from the state budget for utilities consumed during the free accommodation of IDPs.

Thus, the response ensured the restoration of the right of internally displaced persons to equal conditions of free accommodation and access to housing and communal services, reduced the financial burden on the residents of the modular town and created the preconditions for the stable application of the state compensation mechanism, which is in line with the principles of equality, non-discrimination and social justice.

Protection of the right to property of persons whose housing was destroyed or damaged as a result of the armed aggression of the Russian Federation is one of the key areas of activity of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Zaporizhzhia region.

In the region, which is systematically subjected to rocket and artillery shelling, thousands of citizens found themselves in a situation where their homes were declared uninhabitable, and local governments were forced to make decisions to dismantle destroyed houses. In such circumstances, the issue of preventing secondary human rights violations - loss of personal property, lack of real access to compensation, and formal approach of the authorities to the needs of the victims - becomes particularly important.

<i>The Ombudsman received an appeal from residents of an apartment building in Zaporizhzhia. The circumstances of the case established that on 26 September 2024, a three-storey apartment building was severely damaged as a result of rocket fire by the Russian Federation in Zaporizhzhia. Based on the results of the commission's inspection, all 24 apartments were declared uninhabitable, the building was classified as in emergency category 4, and its restoration was economically unfeasible.</i>
<i>The Zaporizhzhia City Council decided to completely dismantle the building and signed a contract with a contractor. The residents were informed that the work would begin on 11 March 2025.</i> <i>At the same time, a significant amount of personal property remained in the destroyed apartments, including furniture, household appliances, documents, and basic necessities. People were physically unable to remove them in time, and when they asked the relevant department of the city council to postpone the dismantling, they received a verbal refusal.</i> <i>This created a real threat of violation of the right to property, as the dismantling of the house could lead to the permanent loss of the residents' property.</i> <i>Having received a complaint from the resident, the Ombudsman's office in Zaporizhzhia region responded within the framework of parliamentary oversight of the observance of constitutional human rights and freedoms.</i> <i>The regional office analysed the circumstances of the case and the risks of violation of the right to property, prepared and sent an official letter to the Zaporizhzhia City Council with demands to postpone the dismantling of the damaged house, provide residents with a real opportunity to remove their personal property and provide information on the legal grounds and procedure for dismantling.</i> <i>In response to the intervention of the Ombudsman's office, Zaporizhzhia City Council informed about the change of approach to the implementation of the decision on dismantling:</i> <i>the dismantling of the building will be started only after the complete removal of the residents' personal property;</i>
<i>comprehensive assistance to residents in the transportation of their belongings (loading, transport, escort) was organised;</i> <i>the residents were confirmed in their right to receive compensation for the destroyed housing in the form of housing certificates.</i> <i>As a result, the residents' violated right to property was effectively restored.</i>

Based on the results of the monitoring visits, **112** recommendations were made to state authorities, local governments, organisations and institutions responsible for the proper functioning of temporary accommodation. Of the recommendations provided, **25** were implemented; **70** are being implemented; **8** were partially implemented; and **9** were not implemented.

4. Protection of information rights of citizens

The right to information is one of the basic constitutional guarantees, the implementation of which directly affects the ability of a person to effectively protect

his/her other rights and freedoms. It is access to complete and reliable information that allows citizens to control the activities of the authorities, make informed decisions and defend their legitimate interests.

In view of this, the Ombudsman's Office in Zaporizhzhia region pays systematic attention to this area. Within the framework of the parliamentary control, during the reporting period, 6 monitoring inspections were conducted to check compliance with the legislation on access to public information and consideration of citizens' appeals.

Zaporizhzhia region has its own unique challenges:

- Relocation of a significant number of government and local self-government bodies from the temporarily occupied territory of the region creates additional obstacles to access to information;
- Numerous appeals from citizens, internally displaced persons, military personnel and their families, who often need not only legal but also information support;
- the need for clear, timely and open information on rights, services, procedures and protection in the security situation.

Along with challenges in the area of access to information, the monitoring inspections revealed systemic issues that are common to all the inspected facilities:

- Insufficient transparency of financial information: no or incomplete data on the structure and amount of budget funds, the procedure and mechanisms for their use, the principles of formation and the amount of remuneration and remuneration;
- inadequate information content of the section "Citizens' appeals": information is incomplete or does not meet the requirements of relevance and accessibility;
- Lack of published schedules of personal reception by the management;
- outdated contact telephone numbers and ways of contacting.

The Ombudsman received a complaint from the head of a civic organisation in Zaporizhzhia region regarding violation of the right to access public information.

The issue was that the applicant had been provided with incomplete information on the calculation and payment of salaries to employees of educational institutions in Zaporizhzhia. At the same time, the requested documents were significantly depersonalised (without full names, positions, payment structure) or not provided at all, in particular, it concerned bonus orders, which made it impossible for the public to control the use of budget funds.

The Ombudsman's Office in Zaporizhzhia region verified the facts stated in the appeal, sent letters to educational institutions, the Left Bank and Central Departments of Education and the Department of Education and Science of Zaporizhzhia City Council.

However, the analysis of the repeated responses provided to the applicant showed an inadequate level of awareness of the responsible persons of the said public information administrators of the requirements of the law and the selection of unreasonable grounds for restricting access to public information.

In view of the above, there was an objective need to initiate the Commissioner's proceedings and send repeated letters demanding restoration of the applicant's right and clarification of the provisions of the Law of Ukraine "On Access to Public Information".

Separately, taking into account the number of subjects and information administrators whose activities the applicant had requested, the Commissioner's office in Zaporizhzhia region held a meeting with heads of educational institutions and structural units of the city council, where it was emphasized that these institutions were obliged to provide complete and reliable public information.

As a result of the Mission's response, the applicant's right to access public information was restored: The Department of Education and Science of Zaporizhzhia City Council and the relevant educational institutions reconsidered the requests and provided the full package of requested documents.

The Ombudsman's proceedings were terminated due to actual elimination of violations and restoration of the right to information.

The Commissioner received a complaint about violation of the applicant's right to information by a state-owned enterprise in Zaporizhzhia Oblast. The peculiarity of the said violation of rights was in requesting information both about himself and the enterprise's activities.

Thus, the content of the appeal established that the applicant applied to the State Enterprise "Enterprise of the State Criminal Executive Service of Ukraine (No. 55)" (hereinafter - SE "SESU") with a request for information, in which he asked to provide copies of orders on bonuses for all employees, orders on the applicant's personal business trip with indication of the place of destination, as well as information on the applicant's salary and deductions.

In response, the applicant received a letter with attachments, but the number of attachments indicated in the letter did not correspond to the actual number received, and the information provided did not cover all the issues of the request, so the applicant appealed to the Commissioner.

As part of the consideration of the appeal, a letter was sent to the SE "PDCVS" with a request to reconsider the applicant's request for information and provide a full response. In its response, the company informed about consideration of the request and provided a copy of the response with attachments, but the issues of providing information on bonuses for all employees and clarifying the place of business trip remained unresolved.

In view of this, the letter was sent again with a request to provide the said documents or, if they could not be provided, to provide a reasoned explanation of the reasons. In response, the SE "PDCVS" reported that information on employee bonuses was personal data, and information on the place of business trip could not be disclosed, as the place of business trip was a military unit. Disagreeing with the arguments of the SE "PDCVS" and taking into account the position of the information manager, the Commissioner initiated proceedings and re-sent a request to the SE "PDCVS" with appropriate explanations.

Following consideration of the request, a response was received in compliance with the requirements of the current legislation and fully covered all the applicant's questions, which indicates that his right to access information was restored.

Ensuring the right of citizens to appeal to city council members is one of the key tools of real local self-government. It is through appeals that people report violations of their rights, problems of access to services, security challenges, social and humanitarian needs, and deputies become the first link between the community and the authorities. Proper consideration of appeals, meeting deadlines and providing a reasoned response builds trust in local authorities and confirms that the government is accountable and open.

Feedback between a deputy and a citizen is not a formality, but a mechanism for protecting human rights. In frontline Zaporizhzhia, appeals often relate to vital issues: shelters, evacuation, housing for IDPs, social benefits, and access to medical care. When a deputy does not respond or limits himself to a formal reply, people actually lose the opportunity to exercise their rights. Instead, high-quality consideration of the appeal and subsequent deputy inquiries, appeals to executive bodies or control over their actions turn the appeal into a real tool for solving problems.

An applicant complained to the Ombudsman about alleged violation of his right to appeal by deputies of Zaporizhzhia City Council, who, according to the applicant, had not properly considered the appeal and failed to respond within the time limits established by law.

In order to fully clarify the circumstances, the Ombudsman's Office in Zaporizhzhia region sent relevant letters to the Zaporizhzhia City Council and directly to the deputies within the framework of parliamentary control.

With the assistance of the Ombudsman's Office, the deputies considered the applicant's appeal and provided a written response, which confirmed the fact of response to the appeal and allowed to restore communication between the citizen and the representative of the local self-government body.

Based on the results of the monitoring work in the area of observance of the right to access public information and consideration of appeals, **33** recommendations were provided to the authorities and local self-government bodies, of which, in 2025: **25** were implemented, **2** were in the process of implementation, and **6** were not implemented.

5. Ensuring the observance of citizens' rights to safety, accessibility and proper condition of shelters and protective structures under martial law

For the residents of Zaporizhzhia region, shelters and other civil protection facilities are primarily an element of the realisation of the basic human right to life and security.

During monitoring visits in the field of civil protection, it becomes possible to fulfil their key task of identifying the real state of readiness of facilities for use, which is of particular importance for the city of Zaporizhzhia.

In 2025, the team of the Regional Office of the Ombudsman in Zaporizhzhia Oblast conducted **43** monitoring visits to the facilities of the civil protection fund in Zaporizhzhia. These activities were carried out to verify compliance with the requirements of the legislation in the field of civil protection, ensure the right of citizens

to safe conditions of stay during air raids and emergencies, as well as assess the actual state of accessibility and proper functioning of shelters.

Based on the results of the monitoring, relevant reports were drawn up and sent to the balance holders of protective structures, local governments, local executive authorities and other authorised entities for response within their competence. The reports contain **199** recommendations to eliminate the identified violations and shortcomings, bring civil protection facilities into a condition suitable for their intended use, and ensure their proper maintenance and operation in accordance with the requirements of the applicable law.

Monitoring visits have shown the existence of systemic problems in the area of ensuring the readiness of civil protection facilities. Out of the total number of inspected facilities, **25** do not meet the established requirements for sanitary and hygienic conditions, technical serviceability of engineering support, proper lighting, availability of seats, water supplies and other necessary conditions for safe and relatively comfortable stay of the population during air raids and emergencies.

All inspected facilities are included in the official map of shelters in Zaporizhzhia and, in accordance with the requirements of the law, are subject to mandatory opening and unimpeded access for the public during the announcement of the Air Alert signal or in the event of an emergency. The monitoring visits also revealed problems with the actual accessibility of certain shelters. In particular, there were **7** cases when the protective structures were closed during the alarm period or there was no information (signs, plaques, announcements) on the availability of a civil protection facility at the relevant address and the procedure for accessing it.

The situation with privately owned protective structures, including those on the balance sheet of apartment building co-owners associations, is of particular concern. In **7** cases, the balance holders did not ensure proper organisation of public access to such shelters, which creates risks of violating the right of citizens to protect their lives and health under martial law.

In addition, **9** of the inspected facilities need to be repaired, equipped and properly furnished in accordance with the requirements of civil protection legislation, in particular, the technical condition of premises, engineering networks, communications, fire safety and information support.

The implementation of the recommendations is constantly monitored by the Regional Office of the Commissioner to ensure proper response to the identified violations and achieve their complete elimination.

In September 2025, the specialists of the Regional Office of the Ombudsman in Zaporizhzhia region conducted a scheduled monitoring visit to the facility of the Civil Protection Facilities Fund - the simplest shelter located on the basis of the premises of the district administration of the Zaporizhzhia City Council in Voznesenivskyi district.

The purpose of the monitoring was to find out the actual state of readiness of the shelter for its intended use, to check its accessibility for the public, including persons with disabilities and other low-mobility groups, as well as to assess compliance with the requirements of current legislation in the field of civil protection and human rights.

The monitoring found that the shelter has a number of shortcomings that directly affect the right to safety, in particular: the second entrance/exit of the shelter is not

equipped with an information sign labelled "Shelter", barrier-free access for people with disabilities and other low-mobility groups is not provided, there are no remote sewage tanks, and there are no medical supplies (first aid kits) and long-term food supplies.

Based on the results of the monitoring, a report was prepared and sent to the balance holder of the shelter with recommendations to eliminate the identified deficiencies, bring the shelter into a state of full readiness for its intended use, increase its level of barrier-free accessibility and ensure proper and safe conditions for citizens.

As part of its response to the recommendations, the District Administration of the Zaporizhzhia City Council for the Voznesenivskyi District reported that it had taken appropriate measures and informed that the recommendations had been fully implemented.

Thus, as a result of the response of the Ombudsman's Office in Zaporizhzhia region, the shelter can be used for its functional purpose, and citizens have received the legal right to safety.

The status of implementation of the recommendations and measures taken to ensure the right to security remains under control of the Ombudsman's Office in Zaporizhzhia region. Thus, out of **199** recommendations: **22** were implemented; **139** are being implemented; **2** were partially implemented; **35** were not implemented.

6. Observance of the rights of persons in places of detention

In 2025, the Regional Office of the Ombudsman in Zaporizhzhia region conducted **13** visits to places of detention as part of the implementation of the functions of the National Preventive Mechanism. The visits covered units of the National Police of Ukraine, penitentiary institutions, medical units of the Health Care Centre of the State Criminal Executive Service of Ukraine, psychoneurological boarding schools, a clinical facility for psychoneurological care, a geriatric hospital and a room for temporarily detained military personnel.

Visits to **4** units of the National Police of Ukraine in Zaporizhzhia region revealed some systemic shortcomings in the organisation of service activities that negatively affect the protection of human rights and observance of procedural guarantees for persons whose freedom is restricted.

A significant problem is the lack of functioning rooms for detainees in **3** units of the Zaporizhzhia District Police Department, which makes it impossible to ensure that detention conditions are in accordance with the principles of legality, humanity and respect for human dignity. In such circumstances, detainees are held in premises that are not suitable for detention, which creates potential prerequisites for violations of the prohibition of cruel or degrading treatment. It has been established that in the absence of specially equipped premises, there is a risk of inadequate access to drinking water and food for detainees, as well as failure to ensure compliance with privacy standards and proper sanitary and hygienic requirements, which are basic components of humane treatment.

It should be noted that cases of violations of the right to legal aid were also recorded in the activities of **3** police stations, in particular the lack of separate rooms for

confidential communication with a lawyer and untimely notification of the relevant free legal aid centre, which makes it difficult to receive timely professional legal support and exercise the constitutional right to defence.

This situation creates a real risk of violation of the fundamental rights of detainees and non-compliance of the activities of the units with the requirements of the law and international human rights standards.

A systemic problem in the activities of the medical units of the Healthcare Centre of the State Criminal Executive Service of Ukraine, identified during 2 monitoring visits, is the lack of substitution maintenance therapy for persons in need. This leads to an increased risk of complications, exacerbation of chronic diseases and violation of the standards of medical care defined by the current legislation of Ukraine, which negatively affects the health of detainees and the efficiency of the healthcare system in penitentiary institutions.

Certain facts revealed during 2 monitoring visits to the institutions of the State Criminal Executive Service of Ukraine may indicate not only individual violations, but also potential systemic problems in the activities of the healthcare institutions of the SPS, in particular with regard to the timeliness of diagnosis, the adequacy of medical response, the effectiveness of interaction with civilian healthcare institutions and internal control over the quality of medical care. In conditions of non-freedom, the state has an increased positive obligation to ensure the right to life and health of convicts, and therefore any signs of inadequate medical care require not only procedural verification in specific cases, but also a comprehensive assessment of the organisation of the work of the SPS healthcare centre in order to eliminate the risks of recurrence of similar situations in the future.

Separately, considering the security aspect of the activities, it should be noted that during the visit to the Zaporizhzhia detention facility, it was established that there is no civil protection structure on the territory of the institution where detainees and staff could safely take refuge in case of emergency. Given the proximity to the frontline and the increased level of security risks, the absence of such a protective structure poses a serious threat to the safety of both staff and detainees.

As part of the implementation of the national preventive mechanism, on 14.03.2025, employees of the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Zaporizhzhia region, together with a representative of a non-governmental organisation, visited the medical unit No. 99 of the branch of the State Institution "Health Care Centre of the State Criminal Executive Service of Ukraine" in Zaporizhzhia region.

During the study of medical records, a record of the death of a prisoner born in 1988, who was undergoing treatment in the said medical unit, was found. According to the medical records, the death occurred on 06.03.2025 in in the car of the emergency medical team as a result of pulmonary and cardiac insufficiency and out-of-hospital polysegmental pneumonia of group III. Later, when the cause of death certificate was examined, it was found that the death was due to bilateral fibrinous purulent pneumonia.

During the inspection of the scene by law enforcement agencies on 06.03.2025, no signs of violent death were found. On the same day, the incident was registered in the

Unified Register of Pre-trial Investigations under No. 12025082230000141 under part one of Article 115 of the Criminal Code of Ukraine with the note "natural death".

In view of the above, the representative of the Ombudsman in Zaporizhzhya region appealed to the Zaporizhzhya Regional Prosecutor's Office to conduct an investigation into the death of the convict.

According to the Zaporizhzhia Regional Prosecutor's Office, it was established that the results of the inspection of the observance of the convict's rights indicate the possible fact of improper performance by medical staff of medical unit No. 99 and the municipal non-profit enterprise "City Hospital No. 9" of the Zaporizhzhia City Council in the performance of their professional duties, which could have led to the convict's death.

In this regard, the prosecutor, in accordance with the requirements of Article 214 of the Criminal Procedure Code of Ukraine, on 21.03.2025, entered information into the Unified Register of Pre-trial Investigations under part one of Article 140 of the Criminal Code of Ukraine at 42025080000000035.

The pre-trial investigation is currently ongoing.

Violations affecting the rights and conditions of stay of residents were identified in the activities of psychoneurological boarding schools in Zaporizhzhia region. During a visit to the Zaporizhzhia Children's Orphanage and Veselivske Psychoneurological Boarding School of the Zaporizhzhia Regional Council, it was found that the main problems include overcrowding and limited living space. In addition, there is no mandatory annual medical examination of inmates by a medical advisory commission with the participation of a psychiatrist, which violates the right of inmates to medical care, control over their conditions of stay and review of the appropriateness of their continued stay in the institution. The need was identified to strengthen security measures, organise evacuation, and ensure proper cooperation with social protection and healthcare institutions to provide comprehensive care and support to the inmates.

The most significant violations were found in the activities of the Veselivskiy Psychoneurological Boarding School of the Zaporizhzhia Oblast Council, which concerned non-compliance with the rights of the wards, the requirements of the legislation in the field of social services and standards of inpatient care. Based on the results of the visit, the Commissioner prepared and sent submissions to the Ministry of Social Policy of Ukraine, the National Social Service of Ukraine, Zaporizhzhia Regional Military Administration and Zaporizhzhia Regional Council to take measures within their competence to eliminate the identified violations, ensure the observance of the rights of the wards and prevent similar violations in the future activities of the institution.

Based on the results of the monitoring visits, **123** recommendations were made to address the identified human rights violations and shortcomings in the work of the relevant institutions. In 2025, **57** recommendations were implemented, **16** recommendations were partially implemented, **24** recommendations remain in the process of implementation and **26** recommendations are still pending.

7. Protecting the right to a safe environment

Zaporizhzhia is one of the main centres of industrial development in Ukraine. The structure of industrial production with a high share of the most environmentally hazardous industries leads to high levels of air pollution in the city.

The issue of ensuring a proper environmental environment and observance of citizens' rights to a safe environment is of critical importance for Zaporizhzhia. Of particular concern is the state of the air, which, according to numerous complaints from residents, is polluted by industrial enterprises.

In the Ombudsman's Annual Report on the state of observance and protection of human and civil rights and freedoms in Ukraine in 2024, the Ombudsman made a recommendation to Zaporizhzhia City Council to ensure preparation of a programme for phased reduction of pollutant emissions by business entities.

By the decision of Zaporizhzhia City Council No. 28 dated 30.04.2025, the Environmental Protection Programme for the phased reduction of pollutant emissions by business entities in Zaporizhzhia was approved, which is intended to become an effective tool for protecting the environmental rights of the community.

In view of the above, the Commissioner's Office in Zaporizhzhia Oblast provided a recommendation and sent a letter to the Zaporizhzhia City Council to take measures to control and minimise the negative impact of industrial enterprises on the environment, in particular, to develop and implement a programme for reducing pollutant emissions by business entities.

The actual implementation of the programme remains a pressing issue today, given the proximity to the active hostilities zone and the limited resources of the local government. Residents of the city continue to face excessive air pollution, which poses a real threat to their health, especially children, people with chronic diseases and the elderly. It is the effective implementation of the Programme that will ensure the constitutional right of Zaporizhzhia residents to live and be healthy in a favourable environment.

In December 2025, the Ombudsman received an appeal from a civil society organisation regarding the systemic deterioration of air quality in Zaporizhzhia and possible violation of the constitutional right of residents to a safe environment . The appeal referred to the lack of effective response of local authorities, lack of continuous monitoring, absence of an anti-crisis action plan and assessment of the impact of air pollution on public health.

As part of the parliamentary oversight, the representative of the Commissioner in Zaporizhzhia region initiated obtaining an official position and explanations from the Zaporizhzhia City Council on measures taken to improve the environmental situation, in particular the state of the air, as well as on plans for monitoring and protecting the health of the city's residents.

In response, the Zaporizhzhia City Council informed that a number of measures are being taken to improve the environmental situation in the city, including

- the programme of state monitoring in the field of atmospheric air protection of the Zaporizhzhia agglomeration for 2022-2026, approved by the decision of the Zaporizhzhia City Council dated 12.07.2023 No. 29, provides for the installation of new automated monitoring points for fixed and indicative measurements. Thus, it is planned

to install 5 indicative automated air pollution monitoring stations in different districts of the city, which will allow obtaining the results of air pollution monitoring to inform the population;

- the programme to support the functioning of the mobile environmental monitoring laboratory of the State Institution "Zaporizhzhia Regional Centre for Disease Control and Prevention of the Ministry of Health of Ukraine" for 2026, approved by the decision of the Zaporizhzhia City Council of 17.12.2025 No. 22, provides for funding for the verification and calibration of measuring instruments and equipment, the purchase of three calibration gas mixtures for calibration cylinders of instruments, consumables, argon gas for the operation of a gas chromatograph, as well as fuel and lubricants for the

- Zaporizhzhia's participation in the Ukrainian-Finnish UFAIR project to install an indicative air quality monitoring station;

- organisation of new automated observation points for indicative measurements and prompt informing the population about air quality using the air quality index and recommendations for sensitive and vulnerable groups of the population by the structural units of the city council.

At the same time, the city council acknowledged the absence of a separate (anti-crisis) plan for responding to periods of increased pollution, did not provide an assessment of the systemic risk to public health, and did not conduct a legal assessment of the situation in terms of observance of the human right to a safe environment. The responses provided are mainly descriptive and procedural in nature and do not contain comprehensive solutions to address the causes of air quality deterioration.

The Ombudsperson's Office in Zaporizhzhia region keeps the implementation of these measures under control to ensure that the authorities comply with the legislation in the field of air protection and protection of the human right to a safe environment.

RECOMMENDATIONS:

Zaporizhzhia Regional State Administration, Regional Military Administration:

Introduce a unified algorithm for settling and changing the place of temporary residence of IDPs within the region;

to ensure compliance with the requirements of the legislation in the field of social services and standards of inpatient care in the municipal institutions "Veseliivskiy neuropsychiatric boarding school" of Zaporizhzhia Regional Council and "Zaporizhzhia orphanage" of Zaporizhzhia Regional Council;

to ensure systematic coordination and control over the state of readiness of civil protection facilities on the territory of Zaporizhzhia city territorial community, taking into account the results of monitoring visits;

ensure proper and complete disclosure of public information by subordinate structural units in accordance with the procedure established by law and ensure regular updating of the said data on official web resources.

Zaporizhzhia city council:

Ensure control over the implementation of the Programme for Phased Reduction of Pollutant Emissions by Business Entities with the involvement of the public sector;

take urgent organisational and practical measures to bring civil defence structures into a condition suitable for the safe stay of the population, taking into account the recommendations provided as a result of monitoring visits;

ensure proper and full disclosure of public information by subordinate structural units and municipal enterprises in accordance with the procedure established by law and ensure regular updating of the said data on official web resources;

to take measures to ensure that the deputies of Zaporizhzhia city council are duly informed about the receipt of appeals addressed to them.

11.9. Ivano-Frankivsk Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **4,127** appeals from Ivano-Frankivsk region, containing **4,771** reports of human and civil rights violations.

Among the most frequently mentioned human rights violations in the reports are: civil rights - **3,087** reports, social rights - **437** reports, economic rights - **338** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	900	2553	3566	4 127
Reports of rights violations	1 166	2939	3910	4 771

Ivano-Frankivsk region is characterised by a significant share of mountainous areas and specific geographical conditions that affect the population's access to basic public, medical and social services. There are **240** settlements in the region that have been granted mountainous status, which is the highest number among Ukrainian regions.

Children from the frontline and de-occupied territories undergo rehabilitation in the region, receiving comprehensive rehabilitation, psychological and social support, which helped restore children's rights to a safe and healthy environment, which were violated by the war.

Along with meeting the needs of internally displaced persons, the region plays an important role in the system of medical care for wounded soldiers and in ensuring their further rehabilitation. The region's healthcare facilities provide specialised medical care, as well as opportunities for psychological and physical rehabilitation for military personnel and war veterans.

Monitoring visits/on-site inspections

During the year, the team of the Regional Office of the Ombudsperson in Ivano-Frankivsk region conducted **177** monitoring visits and inspections of the observance of constitutional rights and freedoms, including

- 16** visits to places of detention within the framework of the NPM function;
- 4** scheduled inspections of compliance with legislation on personal data protection;
- 3** remote monitoring of the observance of information rights and the right to appeal;
- 22** monitoring visits on observance of children's rights and freedoms;
- 10** monitoring visits on the observance of the rights of national minorities (communities);
- 60** monitoring visits on the observance of the rights of internally displaced persons to proper living conditions at the ICC;
- 9** monitoring visits to educational centres to assess the conditions of admission of applicants from the temporarily occupied territories;
- 50** monitoring visits to the facilities of the protective structures fund to determine whether they can be used for sheltering the population;
- 3** monitoring visits to ensure accessibility for persons with disabilities and other low-mobility groups.

In addition, **45** court hearings in civil and criminal proceedings were attended as part of the parliamentary control over the observance of citizens' procedural rights. During the year, the team of the Ombudsman's Office in Ivano-Frankivsk region conducted personal on-site receptions of citizens in all **62** territorial communities of the region.

Educational activities

One of the tasks of the parliamentary control over observance of human and civil rights and freedoms is to raise the level of legal awareness of the population. Raising awareness of human rights covers a wide range of activities, from developing training programmes to an active presence on social media.

In 2025, the regional office team continued these activities and held **161** outreach events with the participation of local authorities, local self-government officials, law enforcement agencies, the public, and students. The events were attended by **9,151** people.

In addition, in 2025, the region launched the School Ombudsman and Student Ombudsman project initiatives. Currently, **172** School Ombudsmen and **5** Student Ombudsmen have been elected in the region's educational institutions. The project is aimed at creating effective mechanisms for early detection and response to violations of pupils' and students' rights, preventing discrimination and bullying, enabling young people to develop their civic position, developing human rights skills and a responsible attitude to exercising their rights and freedoms.

The main issues addressed by the Ombudsperson's Office were:

- Protection of children's rights;
- protection of the rights of military personnel and war veterans, including family members of missing persons in special circumstances;
- protection of the rights of citizens in the course of conscription for military service during mobilisation;
- protection of the rights of persons held in places of detention;
- protection of the right to life and safety of civilians under martial law;
- protection of the rights of internally displaced persons;
- protection of information rights;
- protection against discrimination.

1. Protection of children's rights

In 2025, the staff of the regional office, together with experts, conducted **22** monitoring visits to institutions of various forms of subordination where children are placed or services are provided to them: children's services (**6**), general secondary education institutions (**10**), specialised sports education institutions (**1**), general secondary education institutions for children with special educational needs (**1**), institutional care institutions of the social sphere (**1**), and health and recreation institutions (**3**).

The main purpose of the visits was to examine the state of observance of children's rights, including the right to safety, life and health, proper living and upbringing conditions, education, healthcare, social protection, protection from violence, abuse and discrimination, as well as access to information and mechanisms for protecting their rights.

The results of the monitoring showed systemic shortcomings that require a response from the state authorities, local self-government bodies and heads of the relevant institutions.

A safe environment in an educational institution is an integral part of the educational process. And the availability of a safe shelter is a key requirement for students to return to full-time education in times of war, as it allows them to continue classes even during an air raid.

However, in some of the protective structures of schools, there is high humidity, lack of or insufficient stocks of drinking water and long-term storage food in free access, and a need to supplement the necessary furniture in accordance with the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of

the Ministry of Internal Affairs of Ukraine No. 579 of 09.07.2018, and the Civil Protection Code of Ukraine.

In addition, on the territory of certain educational institutions (Pereslyansky Lyceum, Delyatynsky Lyceum No. 1), there are objects under construction or repair work without proper fencing and warning signs, which poses a potential threat to the lives and health of children.

This creates risks to the exercise of children's right to life, safety and health under martial law, violates the right to safe conditions for children's education guaranteed by Article 53 of the Constitution of Ukraine, and does not comply with the principle of priority of children's interests.

The lack of accessible infrastructure limits the ability of children with disabilities to exercise their right to equal access to education, social and other services. In most of the educational institutions visited, sanitary facilities are not equipped to meet the needs of children with disabilities.

During monitoring visits to local councils' children's services, a number of systemic organisational and staffing problems were identified that directly affect the proper exercise of their powers in the area of protecting the rights and interests of children.

In some of the territorial communities visited (Nyzhnyoverbizka, Pidhaichyky, Korshiv, Pechenizhyn, Mateyivtsi), services (sectors) for children's affairs operate without the status of a legal entity under public law, which does not fully meet the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children". The lack of legal entity status limits the institutional capacity of the service, in particular in terms of independent exercise of powers, proper organisation of office work and accounting, participation in interagency cooperation, and representation of children's interests in courts and other public authorities. This has a negative impact on the implementation of the principle of the best interests of the child, enshrined in Article 3 of the UN Convention on the Rights of the Child and Article 7 of the Law of Ukraine "On Protection of Childhood".

It was also found that vacant positions were not filled in accordance with the approved staffing levels of children's services. Insufficient staffing leads to an excessive workload for the specialists working there and makes it difficult for them to perform their main functions.

Overall, monitoring visits remain one of the key tools for preventive protection of children's rights, ensuring transparency of educational institutions and increasing the responsibility of public authorities for compliance with the standards set out in the Constitution of Ukraine, the UN Convention on the Rights of the Child and national legislation.

Monitoring visits in previous years have documented serious systemic problems in the provision of psychiatric care for children. In particular, the regional specialised psychiatric institution did not have a children's psychiatric unit (previously liquidated), which deprived children in Ivano-Frankivsk region of the right to receive psychiatric care in an inpatient setting. If a child was hospitalised, he or she was placed in a ward with adults, which posed a threat to his or her life and health. Subsequently, based on the results of the response measures taken, in 2024, 15 places for inpatient psychiatric care for

children were set up at the Prykarpattia Regional Clinical Mental Health Centre of the Ivano-Frankivsk Regional Council.

However, inpatient psychiatric care should be organised with a clear distinction between psychiatric care for children and adults and should be provided mainly at the child's place of residence (stay). In accordance with the Order of the Ministry of Health of Ukraine No. 1881 of 19.10.2018, inpatient care for children in the speciality of psychiatry should be provided by multidisciplinary hospitals, not psychiatric institutions. Also, the Concept for the Development of Mental Health Care in Ukraine, approved by the Cabinet of Ministers of Ukraine on 21.06.2024, stipulated that inpatient medical care for children with mental and behavioural disorders should be provided in multidisciplinary children's hospitals instead of children's departments of specialised psychiatric hospitals.

As a result of the response, taking into account the amendments to the Procedure for Implementing the Medical Guarantees Programme made by the Cabinet of Ministers of Ukraine, according to which, starting from 1 July 2025, inpatient psychiatric care for children under 18 is funded exclusively in multidisciplinary children's hospitals, 5 places for inpatient psychiatric care for children were set up at the rehabilitation department of the Ivano-Frankivsk Regional Children's Clinical Hospital. Over the past 6 months, 88 paediatric patients have received inpatient psychiatric care. Renovation work is also underway to open a separate psychiatric unit with 10 beds in the near future.

Based on the results of monitoring the observance of children's rights, **141** recommendations were made, of which **106** were implemented and **35** are in the process of implementation.

2. Protection of the rights of military personnel and war veterans, including family members of missing persons in special circumstances

Protection of the rights of servicemen and war veterans is one of the key areas of activity of the Ukrainian Parliament Commissioner for Human Rights and its regional offices, which focuses on monitoring the observance of rights and social guarantees, legal protection of combatants and responding to systemic violations of their rights.

The most frequent complaints to the Ombudsman were from servicemen and family members of servicemen who went missing or were in captivity. Thus, **1,514** or **37 per cent** of all appeals to the Ombudsperson's Office concerned the rights of family members of servicemen who went missing under special circumstances, and **73** appeals concerned the observance of the right to social protection of combatants and their families.

In order to ensure direct dialogue between the families of missing and captured servicemen and authorised bodies within the framework of the Regional Working Group of the Coordination Headquarters on the Treatment of Prisoners of War in Ivano-Frankivsk region, **26** meetings were held in 2025 with the families of missing and captured servicemen, attended by **2,213** people. Such events are held with the participation of representatives of the authorities, law enforcement agencies, social services, the public, etc. and provide affected citizens with access to up-to-date information on the exchange and return of prisoners of war, search for missing persons

and identification of the bodies of the dead, provide legal protection and support to families, and facilitate the prompt resolution of issues related to the provision of social guarantees to affected families.

Given the urgency of protecting the rights of veterans, military personnel and their families, and in order to discuss practical tools for effective communication, interaction and protection of the rights of missing servicemen and their families, the Regional Office organised and conducted a training seminar for 63 veterans' support specialists and persons responsible for veteran policy in communities with the participation of related services. This meeting contributed to the development of common standards of work and strengthened interagency cooperation.

During a personal reception, a citizen of Ukraine L., the mother of serviceman K., who went missing under special circumstances in March 2025, asked the Ombudsman's representative to explain the reasons for non-payment of part of her son's allowance to his own child, son V., born in 2004, who is studying full-time at a higher education institution and has not reached the age of 23.

Prior to the declaration of serviceman K. as missing under special circumstances in March 2025, he was in fact the sole breadwinner in a family consisting of his wife O., their young daughter A., their son V. and fully supported them by sending money from the serviceman's salary. However, after he was declared missing, guided by paragraph 6 of the Procedure for the payment of financial support to servicemen captured or taken hostage, as well as interned in neutral states or missing, approved by the Resolution of the Cabinet of Ministers of Ukraine of 30.11.2016 No. 884, the family members of the above-mentioned serviceman, namely his mother S., his father D., the above-mentioned wife O., were paid a part of his financial support in the amount of 50 % in equal shares.

In her application, the applicant appealed to the provisions of Article 30 of the Law of Ukraine "On Pensions for Persons Discharged from Military Service and Certain Other Persons", which provides for the right to a survivor's pension for disabled family members of servicemen who went missing, including students in higher education institutions, but not more than until they reach the age of 23.

This situation is caused by a discrepancy between the above-mentioned Law and Government Resolution No. 884, which limits the range of recipients of payments to minor children only, which violates the right to proper social protection of an adult student child who, due to a legislative conflict, is deprived of the opportunity to receive part of the financial support of a missing parent until he or she completes their studies.

Based on a comprehensive analysis of this situation and the identification of similar cases, systemic contradictions and gaps in the current legislation on social protection of families of missing servicemen were identified.

Currently, the Verkhovna Rada of Ukraine is considering Draft Law No. 4775-IX of 10.02.2026 "On Amendments to Certain Legislative Acts of Ukraine on Social Protection of Servicemen of the Basic Military Service, Members of Their Families and Other Issues", which should eliminate the identified conflicts.

As part of the parliamentary control over the observance of the rights of veterans and their families, the regional office took measures to restore the violated rights. With the assistance of the Ombudsman, the rights of a large family of two Heroes of Ukraine were protected, in particular, the issues of citizenship and land use were resolved.

A mother with many children from Novytska community of Kalush district applied to the Regional Office of the Ombudsman in Ivano-Frankivsk region with a request to assist her family in resolving issues of citizenship for children, land use and other property issues.

In 2014, the applicant's family left the territory of the Russian Federation due to disagreement with the occupation policy of the aggressor and moved to Ivano-Frankivsk region. In February 2022, the father and three sons came to the defence of Ukraine. Two sons were posthumously awarded the title of Heroes of Ukraine for their courage and heroism. Despite their contribution to the country's defence capability, the family was unable to resolve the issue of citizenship and land rights for years.

As a result of a meeting with the Novytske village head initiated by the Ombudsman's representative, in 2025, two minor children became Ukrainian citizens. In addition, the local authorities allocated a land plot to the family, which is critical for a large family, and allocated funds from the local budget to repair the street, providing proper access to their home.

Systemic violations of the right to social protection of combatants and their families undermine trust in state institutions, critically reduce the motivation of citizens to defend the state and increase social tension in society. Therefore, the regional office responded to each such report to restore the violated rights of servicemen and their families.

In April 2025, during a personal reception, the Ombudsman's office received a request from the mother of a war veteran who had been diagnosed with group I disability as a result of severe injuries in June 2024. Despite the defender's critical health condition, he had been deprived of his pension for ten months, forcing the family to rely on volunteer assistance.

In the course of clarifying the circumstances, it was established that the officials of the Rozhnyativ District TCC and JV had improperly performed their duties, as they failed to timely submit a package of documents to the Main Department of the Pension Fund of Ukraine in Ivano-Frankivsk region.

Thanks to the Ombudsman's intervention, this procedure was accelerated and the veteran's rights were restored in accordance with Article 50 of the Law of Ukraine "On Pensions for Persons Discharged from Military Service and Certain Other Persons", which provides that if documents are submitted later than 3 months, but not later than 12 months from the date of disability, the pension is granted for all the elapsed time.

As a result, in June 2025, the defender was granted payments and his arrears were fully repaid from the moment he became eligible for a pension.

3. Protection of citizens' rights in the course of conscription for military service during mobilisation

During the martial law, the Commissioner's primary control is also focused on the observance of the rights and freedoms of citizens liable for military service during the conscription of citizens for military service during mobilisation.

The most frequently raised issues raised by citizens were abuse of authority by officials, including patrol police officers, unlawful actions of the TCC and JV employees during mobilisation activities, detention with the use of physical force, confiscation of phones, and formal passage of the military medical examination.

In December 2025, the Honorary Consul of the Czech Republic in Ukraine appealed to the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Ivano-Frankivsk region regarding the illegal detention and detention of a foreign citizen B. by employees of the TCC and JV in Ivano-Frankivsk region.

According to the consul, the above-mentioned citizen renounced his Ukrainian citizenship in 2018. In response to the violation of the rights to liberty and security of person, freedom of movement of foreigners and stateless persons legally staying in Ukraine, measures were taken to ensure compliance with the law during the mobilisation activities by the employees of the TCC and JV in Ivano-Frankivsk region, and to restore the violated rights of the foreign citizen.

As a result, the foreign citizen B. was released from the place of detention in the premises of the TCC and JV, the responsible employees of the TCC and JV apologised to him, and explanatory work was carried out with the above-mentioned employees of the TCC and JV and their management in Ivano-Frankivsk region.

The situation with the mobilisation of people on antiretroviral therapy (ART) requires special attention. The withdrawal of these medicines is a serious violation of the human right to health and life, in accordance with Article 49 of the Constitution of Ukraine. For people with HIV, ART is life-saving, and interruption of therapy leads to the development of viral resistance, progression to AIDS and death. The withdrawal of medicines actually deprives a person of the means to survive, and during mobilisation is an abuse of power, as military medical units are obliged to ensure continuity of treatment of chronic diseases.

The wife of a person liable for military service appealed to the Regional Office of the Ombudsman in Ivano-Frankivsk region regarding violation of his right to be

called up for military service during mobilisation, and long-term detention, which could pose a threat to his life and health.

During the personal reception, the applicant reported that her husband was living with HIV and was on antiretroviral therapy (ART). During his detention in Ivano-Frankivsk, employees of the Kosiv TCC and JV confiscated his ART medication, and during the medical examination, "the disease was not confirmed". For several days, he and other mobilised persons were transported to different military units and held in an unsuitable building of the Kosiv TCC and JV.

The Ombudsman's Office sent relevant letters to the Main Department of the Military Law Enforcement Service in the Armed Forces of Ukraine, the Command of the Land Forces of the Armed Forces of Ukraine and the Command of the Medical Forces of the Armed Forces of Ukraine for a comprehensive inspection and response measures aimed at restoring the violated rights of the serviceman. After the Ombudsman's response, the serviceman was released and the medicines were returned.

Based on the results of the inspection, the Ivano-Frankivsk Zonal Department of the Military Law Enforcement Service submitted a submission to the Head of the Kosiv RTC and JV to eliminate violations of the current legislation and bring the guilty officials to disciplinary responsibility.

4. Protection of the rights of persons held in places of detention

Implementing the NPM function, the team of the Regional Office together with representatives of NGOs visited **16** places of detention during the year: courts (**2**), territorial police units (**4**), psychoneurological institutions (**1**), orphanages (**1**), inpatient care units for permanent or temporary residence of territorial social service centres (**3**), privately owned geriatric nursing homes (**3**), palliative care units of healthcare institutions (**2**).

The monitoring of human rights observance in places of detention is also carried out by processing appeals from persons held there, as well as appeals filed on their behalf.

The Regional Office received a complaint from a prisoner's lawyer about abuse of office by the staff of the SIZO of the Ivano-Frankivsk Penitentiary Institution (No. 12), which led to the deprivation of liberty of his client beyond the period determined by the court.

According to Article 202 of the CPC of Ukraine, after receiving and verifying a document confirming the posting of bail, an authorised official of the place of detention where the suspect or accused is held shall immediately order his or her release from custody.

However, the staff of the Ivano-Frankivsk SIZO (No. 12), in violation of Article 202 of the CPC of Ukraine, refused to release the accused after he had posted bail set by the investigating judge. The refusal was explained by the absence of the

prisoner's initials in the payment receipt or other comments on the wording of the purpose of payment, despite the presence of a document confirming the posting of bail - a certificate from the SJA in Ivano-Frankivsk region confirming the receipt of the bail amount to the court's deposit account, which is issued only after official confirmation by the Treasury Service.

As a result of the response to the Ombudsman's complaint, the detainee was immediately released from custody.

The results of the NPM's visits indicate a systemic problem of inconsistency between the material and technical base and procedural activities of police units and the standards of observance of detainees' rights.

Thus, the following violations of the rights of detainees remain unchanged and the most widespread in the visited police stations No. 1 (Tysmenytsia), No. 2 (Bohorodchany), No. 3 (Halych) and Ivano-Frankivsk Regional Department of the National Police in Ivano-Frankivsk region in 2025

activities with detainees are carried out in the offices of employees and/or in the reception room, while the order of the Ministry of Internal Affairs of Ukraine of 18.12.2003 No. 1561 expressly prohibits investigative actions and other procedural measures in any premises other than rooms for conducting investigative actions;

rooms for detainees are not functioning due to non-compliance with national and international standards, which creates risks of detention of citizens in conditions of unfreedom in a manner not provided for by law, without proper provision of food, drinking water, free access to the toilet, etc;

there are no rooms for confidential meetings of detainees with defence counsels, which makes it impossible for detainees to meet face-to-face with a lawyer and deprives them of the right to confidential communication with defence counsel without limiting the number of such meetings and their duration. This is emphasised by the European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment in its 21st General Report [CPT/Inf (2011) 28].

Ignoring the implementation of the recommendations made as a result of NPM visits leads to a systematic disregard for procedural safeguards for the protection of detainees, creates conditions for torture or other ill-treatment due to lack of proper control and makes it impossible to exercise the right to legal aid in confidentiality.

During the visits of the NPM to places of detention in the social sphere, systemic violations of the right to liberty and security of person, the right to life and security, the right to health care and medical assistance, the right to an adequate standard of living and other rights guaranteed by law were identified.

In the visited inpatient care units for permanent or temporary residence of communal property (Rohatyn TG, Verkhovyna TG, Bilshivtsi TG), the NPM group recorded violations of the human right to medical care. In particular, the units do not have contracts with healthcare facilities to provide medical care to their residents, medical records are not properly maintained, and dietary food is not provided, with diabetics in need of dietary food among the residents.

Based on the results of the visits, the management of the Territorial Centre for Social Services (provision of social services) of the Verkhovyna Village Council

eliminated most of the identified violations as soon as possible, and the Rohatyn City Council promptly responded to the identified violations.

During the visit to the residential care unit for permanent and temporary residence of the Social Services Centre of Rohatyn City Council, where 24 residents were staying, the air temperature in the living rooms was recorded at +13-16°C. Elderly people were lying under blankets, some had colds, complained of coughing and chest pain, and two of the clients were in hospital with bronchitis and pneumonia. At that time, the heating was stopped due to the end of the heating season in the community.

As a result of the recommendations made during the visit, the heating was restored within a day.

Non-governmental providers of residential social services are a necessary link in the social service delivery system due to the limited capacity of the state to provide shelter to all older persons and persons with disabilities in need of care, including internally displaced persons.

Despite significant positive changes in the provision of care (clients of private nursing homes receive a wide range of medical services provided for by the State Guarantee Programme for Medical Care by doctors of a private medical company with which they have a contract), systemic human rights violations were identified in the three privately owned geriatric nursing homes visited, in particular

most privately owned social service providers operate without entering the necessary information into the Register of Providers and Recipients of Social Services;

private boarding houses are located in rented private houses, which mostly lack protective structures (shelters);

The buildings are not adapted to the needs of persons with disabilities and other low-mobility groups, as they are not equipped with lifts or lifts, and there are no ramps or handrails in the corridors;

people with limited mobility and bedridden residents live on the second and third floors, which makes it difficult for them to get outdoors;

systemic violations include cases when social service contracts are concluded with relatives rather than clients, which leads to violations of the right to liberty and security of person, which is one of the defining and fundamental constitutional rights and freedoms of a person and is retained even in places of detention.

At the same time, there is a low level of interaction between private social service providers and local authorities and local self-government bodies in the region.

In order to eliminate these violations, after each visit, appropriate letters are sent with recommendations to eliminate the identified violations. The actual state of implementation of the recommendations will be clarified during repeated visits.

During the visits of the NPM to palliative care units of healthcare facilities, numerous cases of restriction of patients' basic rights were identified. In particular, in Ivano-Frankivsk region, there is a practice of evacuated IDPs in need of constant third-party care living in palliative care units of local hospitals, including those that are not part of a capable network of healthcare facilities.

Hospital wards are not adapted to accommodate people who actually need social care services rather than palliative care. In such conditions, these people are not provided with adequate nutrition, bedridden patients are unable to use their own money, and cannot always get (renew) bank cards in time to receive social benefits, etc. Hospitals do not have enough space to store their personal belongings and clothes. At the same time, IDP patients are re-registered or "fictitiously" transferred from one department to another in hospitals and registers are manipulated to avoid financial losses due to the mismatch between the medical status of the patients actually residing there and the NHS requirements for the duration of hospitalisation.

IDPs in need of care rather than medical care are in the most vulnerable situation. Using them as an "object" to receive budgetary funds degrades human dignity, which is a violation of Article 28 of the Constitution of Ukraine. Such actions can be regarded as discrimination in access to medical services on the basis of priority and misuse of medical infrastructure, which leads to a violation of the right of other patients to end their lives with dignity.

In addition, according to Article 4 of the Fundamentals of Ukrainian Healthcare Legislation, the state must ensure equality of all citizens in healthcare. When a bed is occupied by a patient who actually needs social care rather than medical care, a patient in terminal illness who needs hospice care is deprived of this right.

In 2025, the NPM group continued to record these violations during visits to the palliative care departments of Solotvyno Hospital and Bilshivtsi City Hospital in Ivano-Frankivsk Oblast, which resulted in the relevant recommendations.

This issue was also repeatedly raised with local authorities and considered at a meeting of the Expert Council with the Commissioner's representative. In order to find ways to solve and improve the system of support for IDPs in need of constant care, in May 2025, with the assistance and cooperation of the Regional Office with UNHCR and the CCC Charitable Foundation, a forum "Social Sphere in War: Regional Experience, Challenges and Prospects of Ivano-Frankivsk Region Communities" was held, during which proposals were developed for a mechanism for the development of social care services, including the medical component, for various social groups, including internally displaced persons.

However, the issue of providing IDPs in Ivano-Frankivsk region with social services of inpatient care remains unresolved. Work in this area continues.

A total of **134** recommendations were made by the NPM following the visits, of which **67** were implemented and **45** are in the process of implementation.

5. Protection of the right to life and safety of civilians under martial law

Lack of access to civilian protection facilities (shelters) in the context of Russia's armed aggression against Ukraine is a violation of the fundamental human right to life enshrined in Article 27 of the Constitution of Ukraine and Article 2 of the European Convention on Human Rights.

According to the information system "Accounting and Visualisation of the Fund of Civil Protection Facilities", there are **1,194** protective structures (shelters, radiation

shelters and simple shelters) in Ivano-Frankivsk region, which should provide a basic level of protection to the population in case of emergencies or military threats.

During the monitoring visits, as well as the analysis of information posted on the official website of the Ivano-Frankivsk Regional State Administration - Regional Military Administration (section "Lists of Civil Protection Facilities"), a number of systemic inconsistencies were identified: some of the data on protective facilities was unreliable, outdated or improperly executed, which made it difficult or impossible to use the facilities in a timely manner in the event of an emergency.

Thus, 4 addresses were identified (3 in Ivano-Frankivsk: Pryvokzalna, Zaliznychna, Sorokhteia streets and 1 in Kolomyia: Drahomanova street) where actual shelters were absent, despite their presence in the List of Civil Protection Facilities.

In addition, according to this List, there are 3 civil protection facilities (CPFs) in one of the communities in the region that belong to the I-III criticality category. At the same time, according to the information on the official website of the local self-government body, there are 6 shelters and 31 shelters in the community. Similar discrepancies were found in other communities of the region, and in some, there was no information on the availability of shelters at all.

These violations created risks to the life and health of the population and constituted a direct violation of the right to life guaranteed by the Constitution of Ukraine.

In order to eliminate these inconsistencies, a response letter with relevant recommendations was sent to the Ivano-Frankivsk Regional State Administration - Regional Military Administration. As a result of the measures taken, the list of civil defence structures and the information on the website were brought into compliance. Currently, protective structures in the region are accounted for in the information system "Accounting and Visualisation of the Civil Protection Facilities Fund".

In the fourth year of the full-scale war, when the threat to the population remains urgent, the monitoring results have revealed a number of systemic violations that make it impossible to use shelters safely and effectively. The most common of these are the lack of signage and information boards, inaccessibility for people with limited mobility, which means that people with disabilities are denied equal access to safety and shelter (70% of structures), cluttered premises, mould, lack of repairs (24%), lack of primary fire extinguishing equipment (35%), lack of medical kits (34%), lack of drinking water supplies (38%). In some places, evacuation exits are missing or inaccessible, which is a critical violation of safety rules.

We also found inadequate condition of utilities, waterproofing and malfunctioning ventilation systems. Many balance holders do not have inspection certificates for their protective structures. Some of the shelters are in poor condition.

Based on the results of the monitoring of **50** shelters and anti-radiation shelters, **212** recommendations were provided to improve their condition, with a focus on accessibility to the public, technical condition and compliance with the requirements of the DBN.

6. Protection of the rights of internally displaced persons

The ongoing armed aggression of the Russian Federation against Ukraine continues to cause significant damage to millions of people, both property and non-property. However, despite the measures taken to support the victims, in particular through social benefits, housing guarantees, compensation and other forms of assistance, IDPs remained one of the most vulnerable categories of people who applied to the Ombudsman for protection of their violated rights in 2025.

As of 01.01.2026, **109,774** IDPs were registered in the Unified Information Database on Internally Displaced Persons in Ivano-Frankivsk region, including **48,928** persons of working age, **4,218** persons in need of employment, **4,258** persons with disabilities, **17,424** pensioners, **28,385** children, and **6,561** others. Internally displaced persons already residing in the region, as well as those arriving from the temporarily occupied territories, continue to need various types of support.

The Regional Office received a complaint from an IDP family, who had been displaced again since 1 January 2022 and whose housing was damaged as a result of hostilities caused by the armed aggression of the Russian Federation against Ukraine, regarding the unlawful termination of the payment of state housing allowance, which they received in accordance with paragraph 13⁽²⁾ of the Resolution of the Cabinet of Ministers of Ukraine of 20.03.2022 No. 332 "Some issues of payment of housing allowance to internally displaced persons" (hereinafter - Resolution No. 332).

In the course of processing the complaint, it was established that payments to the family were terminated as a result of verification and monitoring of state payments, during which it was revealed that the family had purchased foreign currency in excess of UAH 100,000. The social protection authority not only terminated the current payments of the accommodation allowance, but also demanded the return of funds in the amount of UAH 65 thousand that the family received for the period after the purchase of the currency, without taking into account the intended purpose of the purchased currency by the IDP family. In accordance with subparagraph 4 of paragraph 7 of Resolution No. 332, the restriction on the purchase of foreign currency does not apply if the currency was purchased to pay for medical, social and educational services.

As a result of responding to this appeal, the family was provided with legal assistance in preparing a package of documents confirming the targeted use of funds to pay for medical services and filing an appeal to the social protection authority with a request to reconsider the decision to resume payment of the accommodation allowance. Thus, the IDP family managed to prove the intended purpose of the expenses and cancelled the unlawful claim for the return of state aid.

Such reports are not uncommon and point to the systemic problem of imperfect automatic verification mechanisms **that** do not take into account exceptions for the targeted use of funds for vital needs and the formal approach of social protection authorities to assessing the property status of IDPs.

In order to ensure the rights of internally displaced persons to adequate living conditions in places of temporary stay, **60** monitoring visits were conducted in 2025, which resulted in recommendations to ensure a barrier-free environment for persons with disabilities and people with limited mobility, to carry out cosmetic repairs in the ICC premises, to complete the rooms with necessary furniture and to provide them with household appliances. Out of **98** recommendations, **17** (18%) have been implemented, and **81** (72%) are in the process of implementation.

7. Protection of information rights

Information rights are among the priorities of the Ombudsman's activities, as the right to appeal enables the realisation of social, economic and political rights by accessing healthcare, pensions or justice.

In 2025, the Ombudsman's Office conducted **3** on-site monitoring of the observance of human rights to appeals and information by state authorities and local self-government bodies, as well as **4** inspections of compliance with the requirements of the legislation on personal data protection. Based on their results, **18** recommendations were made, of which **15** were implemented **and 3** were in the process of implementation.

Despite the recommendations provided and the awareness-raising activities, annual national monitoring, the regional office continued to record violations of the right to information.

In particular, under martial law, the ability to make an oral request by phone has become almost the only way to quickly obtain information necessary to prevent threats and save lives or preserve health, including for war veterans with vision loss. In such circumstances, it is important to establish telephone hotlines and websites where citizens can make an oral request.

In addition, in pursuance of the National Strategy for Creating Barrier-Free Space in Ukraine, the legislation on digital accessibility has been strengthened, according to

which state bodies are obliged to provide barrier-free access to information for all categories of citizens.

A veteran, a person of group I disability with complete loss of sight as a result of war, appealed to the Ombudsman with a number of complaints about violations of his rights, including the issue of improper information about the consideration of his appeals to local authorities and social services, which sent responses to the applicant in PDF or photocopy format.

Special applications on his smartphone do not recognise these document formats (they do not voice the text on the screen and do not describe the controls), which he constantly emphasises when submitting appeals. It is convenient for an applicant to receive responses to his or her application in the form of a text message in the body of an email, which allows him or her to read them using a "voice assistant".

Sending photocopies to a person with a complete loss of sight is also a discriminatory practice that restricts their right to independently review decisions of the authorities.

A letter was sent to the Ivano-Frankivsk Regional State Administration, the Regional Military Administration and the Ivano-Frankivsk City Council with recommendations to duplicate the text of the response to such applicants directly in the body of the email or use text formats (.docx, .txt, accessible PDF with a text layer) instead of photocopies and "unreadable" PDFs.

In this regard, there is a need to monitor compliance with information accessibility requirements in public authorities and local self-government bodies in the future.

8. Protection against discrimination

Adherence to the principles of equality and non-discrimination is not only a matter of social justice, but also an important condition for Ukraine's European integration. Despite the achievements in creating an inclusive environment in Ukraine, people with disabilities continue to face restrictions in using services on an equal basis with others: incorrect communication, difficult access to transport infrastructure and physical environment, insufficient adaptation of information and services, obstacles to access to education, social and medical services, work, leisure, etc., as well as violations of their right to lead an independent lifestyle.

A ward of one of the municipal institutions providing social services of inpatient care appealed to the Regional Centre for the Protection of Citizens' Rights with a complaint about improper provision of medical care and social services, as well as biased attitude towards him by the staff due to his HIV status.

The applicant has a group 1A disability. When clarifying the circumstances of the appeal and during confidential communication with the ward and staff, it was established that since his admission to the institution in November 2023, the applicant had been living alone in a separate room. The man is lying down, practically immobile. At the same time, the bed (multifunctional) is located at a distance that does not allow him to reach the staff call button. There is no TV or radio in the room. Sanitary and hygienic procedures (brushing teeth, shaving, combing, cutting hair, cutting nails, bathing) are not carried out, except for wiping on the bed. At the same time, the facility has the necessary equipment for bathing bedridden people. The ward also needs a medical examination by narrow specialists.

All of the above constitutes the content of the social service of inpatient care for persons who have lost the ability to care for themselves or have not acquired such ability, the state standard of which was approved by the order of the Ministry of Social Policy of Ukraine dated 29.02.2016 No. 198.

Therefore, the institution had drawn up an individual plan for the provision of social services to the ward, but it was not actually implemented. The individual plan for comprehensive rehabilitation (habilitation), which the institution must ensure is drawn up in order to implement an individual rehabilitation programme for a person with a disability, was not presented.

Communication with the staff and management of the institution gave grounds to assert the fact of discrimination against a person with a disability on the grounds of health, which resulted in restrictions on the exercise and enjoyment of his rights and freedoms, leading to inadequate provision of medical care and social care services.

In view of the above, a response letter was sent to the Ivano-Frankivsk Regional State Administration and the Regional Military Administration with the relevant requirements and emphasising the prohibition of discrimination against people by state bodies, authorities, local self-government bodies, their officials, legal entities of public and private law, as well as individuals. The ward reported that he had been examined by doctors, sanitary and hygienic procedures were being carried out and other services were being provided.

Also, at the initiative of the regional office, awareness-raising activities on preventing and combating discrimination against people living with HIV were held in municipal social service institutions.

In 2025, the activities of the Ombudsman's Office were aimed at identifying and removing barriers that restrict equal access to social and public infrastructure. By exercising parliamentary control and responding to appeals, the Commissioner ensures the implementation of the principles of reasonable accommodation and inclusiveness,

guaranteeing the realisation of the rights of persons with disabilities to non-discrimination.

RECOMMENDATIONS:

Ivano-Frankivsk Regional State Administration, Regional Military Administration:

When processing appeals from persons with visual impairments, it is mandatory to take into account the method of communication indicated by them, as required by the Law of Ukraine "On Citizens' Appeals";

to ensure systematic updating and unification of data on the fund of civil protection structures with simultaneous control of their actual condition, accessibility and compliance with the requirements of the legislation and the State Building Code;

to ensure constructive interaction between the authorised authorities and non-governmental providers of residential social services that need advice on the application of the legal framework governing the activities of social service providers, assistance in staff development, and state support to ensure the functioning of private institutions in accordance with the requirements of the law;

ensure systematic measures to raise the legal awareness of social service providers and trainings for social service providers, including non-governmental ones.

Local authorities of Ivano-Frankivsk region should ensure:

staffing of children's services in accordance with the normative staffing levels, taking into account the number of children in the community;

the organisational and legal status of children's services in accordance with the requirements of the law, in particular, to ensure the establishment and functioning of children's services as legal entities under public law;

accessibility of the educational environment for children with disabilities, in particular by providing for and allocating targeted funds for the adaptation of sanitary facilities in educational institutions, arrangement of ramps and other elements of barrier-free access in accordance with the principles of universal design and the requirements of current legislation;

Eliminate dangerous objects on the territories of educational institutions (unfinished construction, repair work without fencing), with the obligatory installation of warning signs and restriction of access to children in order to exercise the right to life and safety.

The Ivano-Frankivsk Regional Territorial Centre for Recruitment and Social Support (RTCS&S) should ensure

Conduct training for employees involved in the conscription of citizens for military service during mobilisation for a special period on legal, ethical and medical aspects of working with persons liable for military service who are HIV-positive, including with the involvement of experts from NGOs. Prevent the seizure of antiretroviral drugs from HIV-positive mobilised persons;

develop an algorithm for prompt verification of citizenship as part of mobilisation activities of foreign citizens and stateless persons.

To the Western Interregional Department for the Execution of Criminal Sentences:

To take measures to prevent the staff of the SIZO in Ivano-Frankivsk region from delaying the release of accused persons from custody after bail has been posted, provided that there is a certificate from the SES in Ivano-Frankivsk region confirming that the bail amount has been deposited into the court's deposit account.

To the Main Department of the National Police in Ivano-Frankivsk region to take measures to

Arrange rooms for investigative actions in the territorial police units in accordance with the requirements set out in the relevant departmental regulations and resume its operation. Ensure that citizens are interviewed and procedural actions are carried out exclusively in rooms for conducting investigative actions;

arranging a separate room for confidential meetings of detained citizens with defence counsels (lawyers) in accordance with established standards;

restore the functioning of rooms for detainees in police stations, provided that they are equipped in accordance with established norms and standards.

11.10. Kyiv city and Kyiv Region

In 2025, the Commissioner received

16,703 appeals and **21,431** reports of human and civil rights violations from the city of Kyiv. Among the most frequently mentioned human rights violations in the reports are: civil rights - **13,512** reports, social rights - **1,473** reports, economic rights - **1,416** reports, children's rights - **853** reports, personal rights - **790** reports;

10,268 appeals and **12,419** reports of human and civil rights violations from Kyiv region. Among the most frequently mentioned human rights violations in the reports

were: civil rights - **7,443** reports, economic rights - **1,383** reports, social rights - **739** reports, personal rights - **454** reports.

m. Kyiv				
Year	2022	2023	2024	2025
Citizens' appeals	5 356	1 2247	15 245	16 703
Reports of rights violations	7 214	1 5715	18 127	21 431

Kyiv region				
Year	2022	2023	2024	2025
Citizens' appeals	2 368	6 324	7 904	10 268
Reports of rights violations	3 014	7 451	8 891	12 419

The geographical location of Kyiv and the Kyiv region, as well as the status of the capital as the political and administrative centre of the state, pose an increased level of security risks to the region in the context of the ongoing armed aggression of the Russian Federation. In 2025, Kyiv and the region were repeatedly subjected to missile and drone attacks, resulting in the destruction of residential buildings, damage to civilian and critical infrastructure, as well as civilian deaths and injuries. At the same time, the communities of Kyiv region and continue to experience the consequences of the hostilities and the temporary occupation in 2022, including the need to restore destroyed housing, infrastructure and support for the affected population. All of these circumstances affect the enjoyment of basic human rights, especially the right to life and security, housing, medical care, education and social protection, and require systematic and coordinated work by state and local authorities to properly protect people's rights and restore violated rights.

Monitoring visits/on-site inspections

In 2025, the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Kyiv region and the city of Kyiv conducted **174 on-site** monitoring visits (visits). In particular, the following were conducted:

27 visits within the framework of implementation of the functions of the national preventive mechanism;

28 monitoring visits on the observance of children's rights;

115 monitoring visits on the observance of the rights of IDPs;

3 monitoring visits on the observance of equal rights and freedoms;

1 monitoring visit on the observance of the rights of military personnel.

The main issues addressed by the Ombudsperson's Office were:

- observance of children's rights;
- implementation of the functions of the national preventive mechanism;
- observance of the rights of persons affected by the armed aggression against Ukraine;
- observance of the right to life and security under martial law;
- observance of information rights;
- observance of social rights.

1. Observance of children's rights

As part of the monitoring of children's rights in Kyiv and Kyiv region in 2025, **28** on-site monitoring visits were carried out, with **237** recommendations made, including to children's services, social service centres, orphanages, educational institutions, and centres for social and psychological rehabilitation of children.

Based on the results of the monitoring, **three** submissions were made to the Ukrainian Parliament Commissioner for Human Rights: Fastiv Academic Lyceum No. 9 of the Fastiv City Council of the Kyiv region, the Kyiv Regional Centre for Social and Psychological Rehabilitation of Children "Oberih" and the private enterprise Special "School-Life".

The visits to general secondary education institutions revealed the following systemic violations: The entrance to the buildings of educational institutions and protective structures (shelters) is not equipped with ramps and handrails, which makes it impossible for children with disabilities and other persons with limited mobility to use them unhindered; conditions have not been created to organise the educational process during long-term stay in a shelter; educational institutions do not have specially equipped sanitary and hygienic cubicles for persons with disabilities, in particular for those who move in wheelchairs or use other auxiliary means. In addition, the presence of expired medicines, non-compliance with the requirements for product proximity and food labelling, and expired food products were detected. The investigation also revealed facts of improper maintenance of mandatory documentation required by the job description of a practical psychologist (including annual and perspective work plans, logbooks, individual plans, etc.), as well as violations of the requirements for publishing the full

scope of mandatory information on the official website of the institution in accordance with the Law of Ukraine "On Education".

In October 2025, the Ombudsman's Office in Kyiv region and the city of Kyiv conducted a monitoring visit to Nemishayivka Lyceum No.1 of the Nemishayivka Village Council of Bucha district, Kyiv region (hereinafter - Nemishayivka Lyceum No.1).

During the visit, a number of significant violations were identified in the canteen, including the presence of alcoholic beverages, expired food, vegetables unfit for consumption, and food without appropriate labelling. These facts indicate a failure to comply with sanitary and hygienic requirements and pose a potential threat to the lives and health of children.

Letters were sent in response to the identified violations and a report was sent with recommendations for immediate action.

In order to implement the recommendations and eliminate the violations, the management of Nemishayevo Lyceum No. 1 conducted an internal investigation and, in accordance with the Commission's Conclusion of 29 December 2025, took the following measures: alcoholic beverages and expired food were disposed of, the canteen chef was reprimanded, discussions were held with the staff on compliance with sanitary standards (Protocol No. 4 of 23 December 2025), and control over the organisation of catering and compliance with sanitary and hygienic standards was strengthened.

In January 2025, the Ombudsman's Office in Kyiv region and the city of Kyiv conducted a monitoring visit to Lyceum No. 23 "Cadet Corps" named after Volodymyr the Great in Shevchenkivskiy district of Kyiv (hereinafter referred to as Lyceum No. 23).

The visit revealed a number of violations, including: overcrowding in the rooms, outdated and damaged furniture, no wardrobes for storing clothes and personal belongings, damaged windows and doors, no hygiene products in the toilets, the shelter does not have a supply of drinking water and long-term storage products, the fact of improper nutrition of children (no daily menu and daily sampling, a large number of expired and unlabelled products, no temperature control, no

Based on the results of the monitoring visit, recommendations were provided to the lyceum director, the Service for Children and Families of the Shevchenkivskiy District State Administration in Kyiv, and the Ministry of Education and Science of Ukraine.

In order to monitor the implementation of the recommendations and eliminate the identified violations, a second visit to Lyceum No. 23 was carried out in December 2025. The monitoring team noted positive changes in the lyceum's activities. All violations have been eliminated. In particular: the living rooms were

renovated and the premises were provided with new furniture: beds, wardrobes, cabinets for storing personal belongings; the toilets were renovated both in the educational building and in the building where children live; the toilets comply with sanitary standards and are provided with the necessary personal hygiene products; the shelter has long-term storage food and drinking water; the food unit was renovated and proper storage of food with expiration dates was ensured; the relevant food safety and health records were properly maintained.

At the same time, systemic violations were identified in institutional care and education facilities. During the monitoring visits **to 4** institutional care and education facilities, the following violations were identified, including **violations** of children's rights to decent living conditions, healthy and nutritious food, life and safety, medical care and rehabilitation, growth in a family environment, and protection from cruel and degrading treatment.

During the monitoring visit to the Kyiv Regional Centre for Social and Psychological Rehabilitation of Children "Oberih" (hereinafter referred to as the Centre), systemic violations of children's rights were identified, including the right to life and health care, to protection from violence and decent treatment, to growth and upbringing in a family environment. In addition, inadequate living conditions and non-compliance with sanitary and hygienic requirements were recorded. Children were found to have stayed in the institution for longer than the maximum period.

Under martial law, the Centre lacked a properly equipped shelter, which posed a real threat to the lives and health of children and staff. Of particular concern was the information received during confidential communication with children regarding the use of forms of punishment by some staff members of the institution that have signs of cruel and degrading treatment, which contravenes Article 19 of the UN Convention on the Rights of the Child.

Based on the violations identified, submissions were sent to the Ministry of Social Policy, Family and Unity of Ukraine, the State Service of Ukraine for Children, the National Service of Ukraine, the Kyiv Regional State Administration, and the Kyiv Regional Council.

Based on the results of the response, additional inspections were initiated by regulatory authorities. The children's living conditions were improved, sanitary facilities were repaired, expired medicines were disposed of, and deficiencies in sanitary and epidemiological requirements were corrected. Disciplinary and training measures were taken with staff to prevent violence and respect children's rights. Efforts are also underway to place children deprived of parental care in family-based care. Social service providers in the territorial communities (Centres for Social Services, Centres for the Provision of Social Services) have assessed the needs of children and their families, and are working to provide them with social services and social support, as well as material, psychological and other support.

In January 2025, a monitoring visit to the private enterprise Special School-Life (Kyiv) revealed gross violations of the rights of children with disabilities and special educational needs.

The main violations identified were: the institution illegally occupied the premises of the municipal preschool education institution No. 412 without a lease agreement; there was no shelter; unauthorised access to the territory; and the use of expired fire extinguishers. Prescription drugs, alcohol and rodent poison were freely available to children. Significant stocks of expired food were found in unsanitary conditions; despite the name "school", the educational process was not provided, there were no qualified staff (teachers, speech therapists), medical personnel.

In order to protect the rights of the pupils, the Ombudsman sent a submission to the Dnipro Regional State Administration to immediately eliminate the violations. After reviewing the submission, it was confirmed that there were no legal grounds for the private enterprise to stay in the kindergarten. In this regard, it was decided to vacate the premises occupied by the private enterprise and return them to the balance sheet holder. Pupils with disabilities were offered a transfer to the Centre for Comprehensive Rehabilitation of Dniprovskyi District to receive appropriate services. The materials on child abuse and illegal use of property were transferred to the National Police.

2. Implementation of the functions of the national preventive mechanism

In 2025, the activities of the Ombudsperson's Office in Kyiv region and the city of Kyiv in the field of prevention of torture and ill-treatment focused on systematic monitoring of human rights observance in the institutions of the National Police and the judiciary. The priority for 2025 was not only to identify violations but also to analyse their structural causes under martial law.

In total, **27** monitoring visits were carried out as part of the functions of the National Preventive Mechanism (hereinafter referred to as the NPM), covering key places of detention in the region:

- **6** temporary detention centres (1 in Kyiv, 5 in Kyiv region);
- **17** district courts (6 in Kyiv and 11 in Kyiv region);
- **2** psychoneurological boarding schools (Kyiv region);
- **1** nursing home for the elderly (Kyiv region);
- **1** medical and rehabilitation centre.

Thus, a generalised analysis of the state of human rights observance in the key areas of monitoring in Kyiv and Kyiv region was carried out.

Based on the results of the monitoring, **177** recommendations were made to the management of the relevant institutions and authorities to eliminate the identified violations of human rights and freedoms.

Observance of human rights in the activities of temporary detention centres

Based on the results of visits to special institutions of the Main Department of the National Police in Kyiv and Kyiv region, it is worth noting the high level of organisation

of official activities and proper protection of the rights of detainees by the administrations of temporary detention centres (hereinafter - TDCs). The management of the institutions demonstrates a proactive stance in implementing international standards (Custody Records) and humanising the conditions of detention, despite limited resources.

At the same time, the monitoring groups recorded a number of systemic shortcomings, which are mainly infrastructural in nature and require a centralised solution:

Civil protection and the right to life. In the 6 TDFs visited, the lack of civil protection structures (shelters) that meet the standards of DBN B.2.2-5:2023 remains a critical problem. Under martial law, this forces staff to leave detainees in their cells during air raids, which poses a direct threat to their lives and health and contradicts Article 27 of the Constitution of Ukraine.

Right to privacy. In 4 TDFs, it was found that there were partitions in the shower cubicles, but no curtains, which violates the right to privacy during hygiene procedures. This does not comply with the requirements of Rule 19.3 of the European Prison Rules and the case law of the ECtHR (in particular, in the case "*Kalashnikov v. Russia*"), which equates such conditions with degrading treatment.

Video surveillance. In 5 TDFs, there were facts of storage of video recordings from surveillance cameras for less than the statutory period (from 3 to 30 days instead of 90 days, as provided for by Order of the Ministry of Internal Affairs No. 777). This makes it difficult to conduct effective investigations into complaints of ill-treatment, weakening the guarantees of protection against torture.

Accessibility and inclusiveness. During the visits, it was found that in 5 TDFs, architectural accessibility for people with limited mobility (lack of ramps, tactile elements, specialised bathrooms) remains an unresolved problem that restricts the rights of persons with disabilities under the UN Convention on the Rights of Persons with Disabilities.

In October 2025, a monitoring visit was carried out to the Temporary Detention Centre No. 2 of the Main Department of the National Police in Kyiv Oblast (Tarascha). During the visit, the monitoring group recorded a number of violations of the rights of detainees and the non-compliance of the detention conditions with national legislation. In particular, violations of the right to privacy were found (shower rooms were not equipped with curtains), non-compliance with the requirements to provide cells with radio sets and the absence of a separate room for a confidential meeting with a defence lawyer. In addition, there was a failure to comply with the regulatory time limits for storing CCTV footage (less than 90 days) and the absolute architectural inaccessibility of the detention facility for people with limited mobility. A separate critical problem under martial law was the inability to provide adequate civilian protection to detainees.

In order to address the identified shortcomings and restore the rights of detainees, a report was prepared and sent to the Main Department of the National Police in Kyiv Oblast along with recommendations.

In December 2025, a response was received from the Main Department of the National Police in Kyiv Region. An analysis of the information provided showed that the police management had promptly taken measures to eliminate the violations, which did not require significant financial costs. In particular, the shower stalls were equipped with curtains, which eliminated the violation of the detainees' right to privacy during hygiene procedures. A plastic partition with a window for communication was also installed in the room for short-term visits without direct contact.

At the same time, infrastructure and security issues remained unresolved due to lack of funding. The recommendations regarding the equipment of the room for lawyers, architectural accessibility (ramps, tactile signs) and radio communication of cells can only be implemented after the allocation of targeted funds for the reconstruction of the detention facility. Regarding video surveillance, the police leadership noted that upgrading the equipment to store recordings for 90 days requires significant investment and will be carried out in stages. Regarding the issue of civil protection, the administration reported that it was impossible to equip a shelter directly in the temporary detention facility. In the event of an air raid alert, the detainees remain in their cells using the "two walls" rule, which does not objectively guarantee their full safety.

Human rights situation in judicial institutions

The situation with human rights in the courts of Kyiv and the region is critical and has acquired signs of a systemic crisis. It is important to emphasise that the identified violations are not the result of improper performance of duties by court employees, but are caused by chronic underfunding of the judicial system by the State Judicial Administration (hereinafter - SJA) and the inadequacy of the old building stock to meet modern justice requirements (DBN B.2.2-26:2010 "Courts").

Key systemic violations affecting the rights of litigants:

Conditions of detention of defendants. In **14 of the 17** courts visited, the number of cells for defendants is critically insufficient (for example, 3-4 cells when 12-20 are needed). This leads to the impossibility of complying with the requirements for the separation of men, women and juveniles, as well as to violations of space standards (often less than 4 m² per person), which in the case law of the ECHR qualifies as inhuman treatment.

Security and dignity (escort). Due to architectural constraints, **12** courts do not have isolated escort routes and special boxes for special vehicles. The defendants are moved through common corridors and staircases, which creates security risks for visitors, degrades the dignity of defendants and violates the presumption of innocence.

The right to an effective defence. In **16** courts visited, there are no special rooms for confidential communication between a lawyer and a client. In addition, the practice of using glass barriers ("aquariums") or metal bars in courtrooms continues, which complicates communication with the defence counsel. According to the ECHR case law (e.g., *Yaroslav Belousov v. Russia*), such conditions may be considered a violation of the right to a fair trial.

Security environment. None of the **17** courts visited was provided with adequate shelter, which endangers the lives of the participants in the process. There are also systemic problems with fire safety (overdue fire extinguishing equipment) and the lack of free access to drinking water for defendants during their long stay in court.

In September 2025, a visit was carried out to the Bohuslav District Court in Kyiv region. During the visit, the court building was found to be in critical non-compliance with the requirements of state building codes and international human rights standards. In particular, the building lacked the simplest shelter, which posed a direct threat to the lives of visitors and employees under martial law. In addition, gross violations of the rights of defendants were found: the court did not have a single cell for defendants of the standard size (at least 4 m²), did not provide an isolated escort route to the courtroom, and did not have a room for confidential work of the lawyer with defendants. The building itself turned out to be architecturally inaccessible for people with limited mobility.

In order to address the identified shortcomings, a report with recommendations was prepared and sent to the management of the Bohuslav District Court, as well as to the Territorial Department of the State Judicial Administration (hereinafter - TU SJA) of Ukraine in Kyiv region as the body responsible for financial and logistical support of courts.

In October 2025, a response was received from the administration of the Bohuslav District Court. An analysis of the information provided and the attached documents (including acts of the commissions) showed that the court management had managed to eliminate some of the violations through organisational means. Since the court objectively did not have the technical capacity to build a shelter in the old building, the administration, in cooperation with the executive committee of the city council, identified and officially approved the use of the simplest shelter located 100 metres away. Relevant information boards and visual route signs were placed on the court premises.

At the same time, infrastructure issues remained unresolved. Recommendations regarding the arrangement of cells, isolated convoy routes, rooms for lawyers and inclusiveness have not been implemented. The court administration justified this by stating that the building was not architecturally suitable for the needs of justice and informed the SJA in Kyiv region of the need to allocate funds for

reconstruction or provide other premises.

Observance of the rights of persons with disabilities and older persons in residential institutions

Protecting the rights of people with persistent intellectual and mental disabilities in social care institutions remained one of the priority areas of monitoring activities. In 2025, two targeted visits were carried out in this area as part of the implementation of the functions of the national preventive mechanism: a scheduled visit to the Bila Tserkva Psychoneurological Boarding School and an unscheduled visit to the All-Ukrainian Treatment and Rehabilitation Centre "Tsybly".

The analysis of the results of the visits shows that, along with the typical infrastructural and domestic problems of inpatient institutions, the most egregious human rights violations occur during the evacuation and long-term placement of wards from the combat zone in institutions that do not meet their needs.

The following systemic violations were identified during the monitoring:

Violation of the right to an adequate standard of living, dignity and privacy. The problem lies in non-compliance with living space standards, depersonalisation of wards and lack of privacy, which is a violation of the standards of the European Committee for the Prevention of Torture.

Threat to life and health (security environment and medical care). The lack of compliance of shelters with accessibility requirements, as well as gross violations of sanitary standards and rules for the storage of medicines and food remain a drawback.

Violation of property rights and freedom of movement. This problem was particularly acute for internally displaced persons with disabilities, who became hostage to bureaucratic obstacles between institutions.

In March 2025, an unscheduled visit was made to the All-Ukrainian Medical and Rehabilitation Centre "Tsybly" (Kyiv region). The monitoring examined the state of observance of the rights of 169 women in the centre's care who had been evacuated from the Bohodukhiv and Malizhenske psychoneurological boarding schools in Kharkiv Oblast.

The visit revealed a critical mismatch between the profile of the medical rehabilitation facility and the needs of people with persistent mental and intellectual disabilities who require long-term inpatient care. This led to a number of gross systemic violations. In particular, a blatant violation of property rights was found: for almost 10 months, women were effectively deprived of access to their pensions and social benefits, as their bank cards were unreasonably held by the administration of the residential facilities at their previous place of residence. There was also a threat to the life and health of the residents: the simplest shelter did not meet the requirements for accessibility for people with limited mobility, and the medical department stored expired medicines. In addition, violations of the right to dignity and privacy were found: living rooms were overcrowded (less than 6 m² per person), sanitary facilities were not equipped with partitions, the personal clothing of the

inmates was impersonal, and freedom of movement around the facility was restricted.

In order to eliminate the identified violations, the Ombudsman made submissions to the Kyiv Regional Military Administration, the Ministry of Social Policy of Ukraine and the Ministry of Health of Ukraine. Also, reports with recommendations were sent to the Kharkiv Regional Military Administration with the requirement to immediately transfer the wards to specialised institutions and restore their rights.

An analysis of the responses received from central and local executive authorities showed the effectiveness of the measures taken and the full restoration of the rights of the wards. According to the Kharkiv Regional Audit Office, following the Commissioner's recommendations, 138 wards were returned to the system of specialised residential institutions in Kharkiv Oblast to ensure proper care. According to the response from the Kyiv LEA, following an individual needs assessment, 31 wards were placed with social service providers in Kyiv Oblast to receive supported living services. With regard to the restoration of property rights, the Ministry of Social Policy of Ukraine informed that it had instructed the Department of Social Protection of the Kharkiv Regional Department of Social Security to conduct inspections of the timeliness of enrolment and the full use of pension funds by the management of residential facilities.

3. Observance of the rights of persons affected by the armed aggression against Ukraine

Kyiv and Kyiv region remain among the leaders in terms of the number of IDPs received. According to the official information of the Kyiv Regional Military Administration, as of 31 December 2025, the number of internally displaced persons (hereinafter referred to as IDPs) was **231,018**. As Kyiv region continues to accept people, this figure is constantly updated and tends to grow.

In accordance with the Order of the Ministry of Development of 10.06.2025 No. 977 "On the Generalised List of Temporary Accommodation Sites", **32** temporary accommodation sites are officially operating in the Kyiv region.

In 2025, the Ombudsman's Office in Kyiv region and the city of Kyiv conducted **27** monitoring visits to the MCCs. The purpose of the inspections was to establish the state of observance of the rights of internally displaced persons in temporary accommodation in accordance with the standards set out in the Procedure for the functioning of temporary accommodation places for internally displaced persons, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930.

The monitoring visits revealed the main problematic issues in the MCCs:

- Insufficient household appliances for the number of IDPs living there (refrigerators, washing machines, electric stoves, kitchen utensils);
- inadequate provision of conditions for people with limited mobility (lack of ramps at the entrance, inability to use sanitary facilities without barriers);

- technical malfunctions of communication networks: power outages, failure of generators, water supply systems (pumps) and sewage systems;
 - Violation of internal regulations: failure of residents to comply with the ICC House Rules, including cases of drinking alcoholic beverages and violation of sanitary and hygienic standards in common areas;
 - improper maintenance of the adjacent territory of the ICC by its balance holders;
- insufficient arrangement of places for recreation and leisure for IDPs.

Based on the results of the monitoring visits, reports were sent to the balance holders, local authorities, and Kyiv DDA with recommendations for measures to improve the living conditions of IDPs.

A total of **65** recommendations were provided, of which: **9** - implemented, **42** - in the process of implementation, **2** - partially implemented.

During the monitoring visits, the team of the Ombudsperson's Office in Kyiv region and Kyiv city paid special attention to individual communication with the residents of the MCC to verify compliance with their personal rights and identify possible violations.

According to the results of the monitoring visit to the ICC on the basis of the modular town in Makariv village, the Mission recorded complaints from residents, in particular

- *regarding the malfunctioning of the generator: due to the failure of the equipment, residents are deprived of the opportunity to use household appliances during power outages;*
- *the inadequate condition of the surrounding area: the territory is cluttered with shrubs, household items and construction waste, which indicates that the balance holder has not fulfilled its landscaping obligations;*
- *violation of the internal regulations: cases of consumption of alcoholic beverages by other residents in common areas remain without proper response from the administration, which is a direct violation of the established rules of conduct in the ICC;*
- *in case of misuse of a room for leisure activities by a resident, to free it from personal belongings, applying disciplinary measures to the resident, if necessary, in accordance with the rules of residence.*

In accordance with the recorded violations, a cover letter with a report was sent to the balance holder, which contains recommendations for taking measures to improve the living conditions of IDPs.

Based on the results of the review, the Makariv village council informed about the measures taken and the implementation of the recommendations, in particular

- *there are 4 diesel generators on the territory of the ICC, which have been repaired and are in good technical condition. During power outages, the generators are provided with the necessary amount of fuel in a timely manner to ensure uninterrupted operation of the facility for five days;*

- *partial landscaping of the adjacent territory was carried out: sanitary cleaning of excess garbage and shrubs was ensured;*
- *the commandant immediately responded to a violation regarding the consumption of alcoholic beverages on the territory of the campus and conducted explanatory work with the resident. He was verbally warned to prevent and stop committing similar offences in the future. In case of repeated commission of two or more violations by an internally displaced person, the right of such person to use the premises should be terminated by early termination of the agreement;*
- *the issue of inappropriate use of the room for leisure activities was resolved: the said room was freed from the personal belongings of the resident of the modular town, and a preventive conversation was held on the use of the premises and property of the ICC in accordance with its purpose in accordance with the agreement and the rules of residence of internally displaced persons in places of temporary residence.*

4. Observance of the right to life and security under martial law.

In 2025, the Ombudsman's Office in Kyiv region and the city of Kyiv conducted **61** monitoring visits to the objects of the fund of protective structures to determine whether they can be used for sheltering the population.

The monitoring visits resulted in **250** recommendations, of which: **33** have been implemented, **213** are in the process of being implemented, and **2** have been partially implemented.

The Mission recorded the following systemic typical violations:

- Inadequate marking of facilities: lack of route signs to the shelter and inaccurate data on the balance holder or access to keys on the entrance plates, which violates the established information requirements and makes it impossible to use the facilities for their intended purpose;
- inadequate content of information resources on the fund of protective structures: inconsistency between the data on the map posted on the official website and the actual availability and condition of shelters, which misinforms the population about the real security infrastructure and creates a false impression of the level of security;
- Lack of communication and warning systems, which causes information isolation of people in the building;
- insufficient material and technical base: lack of rescue tools (necessary for self-rescue in case of collapse), fire extinguishing equipment and backup power sources;
- violation of sanitary and hygienic standards: cluttered premises with unnecessary items, garbage, lack of systematic control over drinking water supplies and expiration dates of medicines in first aid kits;
- non-compliance with barrier-free requirements: lack of ramps, lifts or gangways in most buildings, which violates the right to safety for people with limited mobility;
- restricted access: cases of closed shelters during alarms (lack of guaranteed round-the-clock access) were recorded;

- Poor technical condition: mould, signs of flooding and malfunctioning ventilation systems, which makes staying in the shelter dangerous to health;
- the inadequacy of the area of shelters to the number of students in the institutions, which limits the right to safe access to education.

These violations indicate a formal approach of the balance holders to fulfilling the requirements approved by the order of the Ministry of Internal Affairs of Ukraine dated 09.07.2018 No. 579, which poses real threats to the lives and health of citizens during martial law.

During the visits, it was found that in some communities, a common violation is the submission of inaccurate information about the functioning of civil protection facilities, information about which is posted on official resources and the website of the Kyiv Regional Military Administration.

During the monitoring of the shelters in Fastiv at 35 and 27 Shevchenka Street, numerous violations of the rules of operation of civil protection facilities were identified. Due to the unsatisfactory condition of the facilities, they are unsuitable for their intended use.

However, the availability of information about these facilities on the official website of the city council misinforms the population about the real possibility of their use as functioning shelters.

The identified shortcomings include

- *Poor sanitary conditions of the premises;*
- *the smell of sewage/wastewater;*
- *presence of foreign objects and garbage;*
- *high humidity/leakage, which led to the destruction of the wall covering (peeling and destruction of the plaster layer);*
- *lack of property required by the relevant regulations;*
- *Lack of chairs/benches for sitting, chanterelle tools, fire extinguishers and first aid kits;*
- *there is no electricity in one storage facility;*
- *there is no information on the balance holder responsible for the maintenance and operation of the storage facility.*

In response to the Mission's letter regarding the critical condition of the storage facilities, the Executive Committee of the Fastiv City Council reported that due to the absence of a balance holder, the facilities were functioning only to a limited extent and did not comply with legal standards. In order to comply with the decisions of the Commercial Court on the claims of the prosecutor's office, the city council has initiated the procedure for state registration of municipal ownership of these buildings and is taking measures to organise their further use.

The issue of bringing the shelters into proper condition and ensuring the right of citizens to safety is under constant supervision of the Ombudsman and the Office of the Ukrainian Parliament Commissioner for Human Rights in Kyiv region and Kyiv city. Currently, the work on monitoring the response of local authorities and balance holders to the appeals is ongoing.

5. Observance of information rights

According to the nationwide monitoring of the state of information rights under martial law in 2025, the state of observance of information rights in Kyiv region and the city of Kyiv in 2025 can be assessed as satisfactory with a tendency to gradual improvement. This is due to the active digitalisation of public services, the development of e-governance and the increased openness of public authorities and local self-government. The use of electronic services, in particular through the Diia app, is increasing, which makes it easier for citizens to exercise their information rights by obtaining inquiries, registration data, and administrative services online.

Local self-government bodies generally ensure compliance with the requirements of the legislation on access to public information: official websites and social media pages are up and running; regulations, budgets, reports and news are published; responses to information requests are provided within the established timeframe, although there are sometimes cases of a formal approach or incomplete information. In such cases, citizens apply to the Ombudsman for restoration of their rights.

The Ombudsman received an appeal from the Head of the NGO "Protection of the Ukrainian People" Ts. regarding the failure to provide a personal reception by the management of the Patrol Police Department in Kyiv.

As a result of the response measures taken, the right of the Head of the NGO to a personal reception was restored.

The applicant A. appealed to the Ombudsman in connection with the failure of the Main Department of the National Police in Kyiv region to respond to his appeal.

In order to verify the above circumstances, the Ombudsman's Secretariat, within its powers, sent relevant inquiries to the Police Department No. 2 (Irpina) of the Bucha District Police Department and the Investigation Department of the Main Department of the National Police in Kyiv region.

As a result of the Ombudsman's response, the applicant received answers to the questions raised in his appeal.

The Ombudsman received a complaint from citizen Y. regarding violation of his right to information by Velykodymyr village council of Brovary district, Kyiv region.

As a result of the response measures taken, the right of citizen Y. was restored, and copies of documents requested in the request were provided.

6. Respect for social rights

In 2025, in the context of the ongoing armed aggression against Ukraine, the issue of ensuring proper and safe conditions for the provision of medical care, in particular in healthcare facilities damaged as a result of hostilities, remained relevant. Particular attention is required when such damage is not repaired for a long time, which poses risks to the lives and health of patients and staff.

As part of its parliamentary oversight of human rights and freedoms, the Office of the Ukrainian Parliament Commissioner for Human Rights in Kyiv region and Kyiv city systematically monitored information published in open sources, including social media, on the human rights situation in the region.

During the monitoring of social media, we found reports from patients of the antenatal clinic in Bila Tserkva about inadequate and dangerous conditions in the premises of the healthcare facility. The content of the posts showed that as a result of an attack by an unmanned aerial vehicle in June 2025, windows were smashed in the building, but no repairs were carried out for a long time. As of October 2025, the facility was actually operated without window structures.

The premises had low air temperatures, high humidity and dampness, which posed real health risks to women, including pregnant women undergoing medical examinations and tests. Doctors and other medical staff were forced to work in the same conditions, which could indicate a possible violation of their right to safe and healthy working conditions.

This situation could indicate a possible violation of the right to health care and medical assistance in appropriate conditions, the right to respect for dignity, the right to a safe environment for life and health, as well as the right to safe and healthy working conditions guaranteed by Articles 3, 43 and 49 of the Constitution of Ukraine and Article 6 of the Law of Ukraine "On Labour Protection".

In order to respond to the identified risks and restore the violated rights, the Representative Office sent a response letter to the local government and the balance holder of the institution demanding immediate temporary measures to insulate and light the premises until the windows are actually replaced, ensure control over compliance with sanitary and hygienic standards and occupational safety requirements, coordinate the actions of the contractor to restore the window structures as a matter of priority, and properly inform the community about the situation.

In response, the local government reported that the municipal enterprise of the Bila Tserkva City Council "Bila Tserkva Maternity Hospital" had procured works and concluded an agreement with the winner of the tender for the project "Reconstruction of the premises of the women's consultation of the Bila Tserkva Municipal Enterprise "Bila Tserkva Maternity Hospital", the project documentation of which provides for the replacement of window structures. As of 23 October 2025, the window structures were delivered to the site and installation work began.

Thus, thanks to the response of the Ombudsman's Office, practical measures were initiated to eliminate violations and ensure proper and safe conditions for patients and employees of the healthcare facility.

RECOMMENDATIONS:

The Territorial Department of the State Judicial Administration of Ukraine in the city of Kyiv and Kyiv region:

Ensure compliance with the requirements of DBN B.2.2-26:2010 and the Instruction on the organisation of escorting and holding in courts of accused (defendants) convicted at the request of courts, approved by the joint order of the Ministry of Internal Affairs of Ukraine, the Ministry of Justice of Ukraine, the Supreme Court of Ukraine, the High Specialised Court of Ukraine for Civil and Criminal Cases, the State Judicial Administration of Ukraine, the Prosecutor General's Office of Ukraine of 26.05.2015 No. 613/785/5/30/29/67/68, by equipping

- cells for the accused (defendants), convicts with an area of not less than 4 m² at the rate of three cells per courtroom for consideration of criminal cases
- sanitary facilities for the accused (defendants), convicts;
- to provide isolated routes for escorting accused (defendants) sentenced to courtrooms.

Ensure the provision of simple shelters in court premises for all categories of visitors, including defendants;

to bring the entrance groups and interior of courts in line with the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures".

To the Main Department of the National Police in Kyiv region:

Ensure compliance with the 90-day storage period for video surveillance system recordings in temporary detention centres;

to work on the issue of arranging simple shelters in temporary detention centres.

To the Main Department of the National Social Service in Kyiv and Kyiv region:

To carry out state supervision (control) over compliance with the requirements of the legislation in the field of child protection in Kyiv and all territorial communities of Kyiv region, in particular in children's services and social service providers for families and children (social service centres, social services, territorial centres of social services (social services)).

Kyiv regional state administration, regional military administration:

Ensure accessibility of institutions, including healthcare facilities, general secondary education, ICC, residential institutions, geriatric boarding houses and children's institutions for people with limited mobility by conducting an architectural accessibility audit of the facilities;

- approve an action plan with deadlines and responsible persons for the installation of unimpeded access facilities (including ramps and lifts);
- work out the issue of ensuring the universal design of sanitary facilities;
- calculate and provide for the costs of implementing these measures;
- to ensure coordination of the activities of services for children in the territorial communities of the region, in particular, regarding the status of an orphan or a child deprived of parental care, as well as registration of children who may be adopted;
- to ensure that personal files of orphans, children deprived of parental care and children in difficult life circumstances are formed and brought in line with the requirements of the current legislation;
- to facilitate the placement of children who are fully state-supported in family-based care;
- to take measures (education, trainings) to improve the skills of employees of services in territorial communities.

To the Main Directorate of the State Emergency Service of Ukraine in Kyiv region:

To strengthen control over the state of maintenance and readiness of civil protection facilities, in particular in healthcare, education and public facilities, with response measures in case of violations.

To the balance holders of the objects of the protective structures fund:

to ensure that protective structures are brought into a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018.

11.11. Kirovohrad Region

In 2025, the Ukrainian Parliament Commissioner for Human Rights in Kirovohrad region received **3,651** appeals, containing **4,296** reports of human and civil rights violations.

The most frequently mentioned human rights violations in the reports were: civil rights - **3,024**, social rights - **300**, economic rights - **222**, children's rights - **128**, personal rights - **79**, freedom from discrimination - **58**, political rights - **3**, appeals without the essence of the violated right - **66**, appeals sent by mistake - **2**, other issues - **414**.

The number of	2022	2023	2024	2025

Citizens' appeals	912	2 615	3 285	3 651
Reports of violations of rights	1 147	3 078	3 634	4 296

Kirovohrad region is the geographical centre of Ukraine. The region was one of the first to receive 45 evacuation trains of internally displaced persons from Donetsk region and opened the first social hostels in Ukraine for them. It was also among the first to open interschool resource centres, which set a new standard for educational support. Despite the central location of the region, the security situation in the region is unstable, as most of the air targets launched by the aggressor country violate the airspace of Kirovohrad region, which poses a threat to the region's residents.

Monitoring visits/on-site inspections

During the year, the team of the regional office carried out **164** monitoring visits and inspections, including

14 visits to places of detention as part of the NPM function;

4 monitoring observations of court hearings;

1 architectural accessibility monitoring;

4 scheduled inspections of compliance with legislation in the field of personal data protection;

6 on-site inspections on observance of human and civil rights to appeals and information;

33 monitoring visits on observance of children's rights and freedoms;

51 monitoring visits on the observance of the rights of internally displaced persons to proper living conditions at the ICC;

7 monitoring visits on the conditions of admission of applicants from the temporarily occupied territories through educational centres;

44 monitoring of the objects of the fund of protective structures for the possibility of using them to shelter the population.

Educational activities

In order to prevent human rights violations and raise the level of legal culture of the population, the regional office held **143** outreach events for employees of state

authorities, local self-government, law enforcement agencies, the public, students, and interviews for local media, which reached **986** people.

Twenty-one meetings were held with families of missing and captured servicemen, attended by **917** people.

Also in 2025, the region launched an initiative to implement a pilot project called the School Ombudsman, which aims to implement mechanisms to protect the rights of children and young people and enable them to develop their civic position, know and protect human rights. Currently, **300** School Ombudsmen have been elected in the region's educational institutions.

The main issues addressed by the Ombudsman's office were:

- protection of children's rights;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the right to life and safety of civilians under martial law;
- implementation of the national preventive mechanism and human rights in places of detention;
- protection of information rights.

1. Protection of children's rights

In 2025, the Ombudsman's Office in Kirovohrad region conducted **33** on-site monitoring visits to children's services, general secondary education institutions, educational and rehabilitation centres, special schools for orphans and children deprived of parental care, and centres for social and psychological rehabilitation of children, during which a number of violations were identified. In particular, these include the failure of children's services to take measures to ensure the housing and property rights of orphans and children deprived of parental care; failure to monitor the stay of children placed in family-based care; improper maintenance of personal files of orphans and children deprived of parental care; failure to properly maintain, draw up and implement individual social protection plans for children in difficult life circumstances, orphans and children deprived of parental care.

During the monitoring of the CPS of the Smolyn village council of Novoukrainsk district, Kirovohrad region, when reviewing the Book of primary registration of children left without parental care, orphans and children deprived of parental care, in the column "Information on property owned by the child on the right of private property", a record was found of the presence of property of 3 children of family group T. Guardianship over the children was established and a guardian was appointed, but there was no decision on the appointment of a guardian over the children's property. The children's personal files also contain no decisions on the appointment of a guardianship over their property. In accordance with paragraph 57 of the Procedure for the Conduct of Activities Related to the Protection of Children's Rights by Guardianship and Trusteeship Authorities, approved by Resolution No. 866 of the Cabinet of Ministers of Ukraine of 24 September 2008 (as amended), the district state administrations in the cities of Kyiv and Sevastopol, and the executive body of the city, district in the city (if established), settlement, village council at the location of the property ensures the preservation of the property of orphans and children deprived of parental care and takes measures to establish guardianship over the property.

Based on the results of the monitoring, a report with relevant recommendations was prepared and sent to the PRS for implementation. By the decision of the Executive Committee of the Smolyn Village Council of the Novoukrainskyi District of Kirovohrad Oblast No. 406 of 23 December 2025, a guardian was appointed over the children's property.

The results of monitoring visits to the region's SLCs revealed inadequate work by the region's communities to ensure the right of every child to be brought up in a family, in particular, the absence of foster families. In most cases, this is a violation of children's rights to decent living conditions, life and safety, medical care and rehabilitation, and growth in a family environment.

Employees of the Ombudsperson's Office in Kirovohrad region conducted a number of visits to institutions and identified systemic violations of children's rights, namely: expired medicines in large quantities were not removed from circulation in the medical office; there were no doors/windows in the sanitary facilities of institutions, which leads to a violation of children's right to privacy; showers were not in working order; there were no cleaning schedules in the sanitary facilities; the premises of institutions did not meet the requirements of the law.

During the monitoring visit to the municipal institution "Novopraha Special School" of the Kirovograd Regional Council, it was revealed that the administration of this institution prohibited M.'s mother, who was not deprived of her parental rights, from seeing her three children and communicating with them freely by phone. The monitoring also revealed the following violations: expired medicines were available, sanitary facilities needed repair, shower rooms lacked doors/screens (which violated the right to privacy), etc.

To resolve the issues, the Ombudsman sent a response letter to the Kirovohrad Regional Council and the institution to eliminate the violations. As a result of the response, the institution took a number of measures to improve the living and learning conditions for children. In particular, expired medicines were seized, sanitary facilities were repaired, screens were provided in the shower rooms, additional shower faucets were purchased, and funds were allocated to purchase electric stoves for the catering unit. The mother of three children was allowed to communicate with her children without hindrance. Further elimination of all violations is ongoing.

During the monitoring visits to the Centres for Social Services in Kirovograd region, the staff of the Ombudsman's Office in Kirovograd region identified a number of violations, namely: lack of contracts for the provision of social services with foster families, with families under social support; lack of decisions on social support for a family (person) in difficult life circumstances; lack of mobile teams of social and psychological assistance to victims of domestic violence.

The staff of the Ombudsman's Office in Kirovohrad region monitored the department of social services for family, children and youth of the Centre for social services of Tyshkiv village council in Kirovohrad region.

During the visit, it was found that the unit had not established a mobile team for social and psychological assistance to victims of domestic and/or gender-based violence, and that the personal files of children under social support in the community lacked acts of assessment of the needs of the family/individual, social cards of the family/individual, and plans for social support of the family/individual. Employees of the department use the forms of registration of social work with families/individuals in difficult life circumstances in accordance with the Order of the Ministry of Social Policy of 09 July 2014 No. 450 "On Approval of Forms of Registration of Social Services to Families (Individuals) in Difficult Life Circumstances", registered with the Ministry of Justice of Ukraine on 04 September

2014 under No. 1076/25853, which expired in 2018, orders on registration of families in difficult life circumstances, on removal from social support with the

To resolve the problematic issues, the Commissioner sent a submission to the Tyshkiv village council of Kirovohrad region with a request to eliminate the identified violations.

Based on the results of the measures taken, the Department of Social Services for Family, Children and Youth of the Centre for Social Services of the Tyshkiv Village Council of Kirovohrad Oblast provided information on actual actions and decisions taken, namely: children's personal files were brought in line with regulations governing work with families in difficult life circumstances and social support; systematic processing of personal files, social cards, individual plans, needs assessment acts and other forms of records was ensured,

In 2025, the Mission provided 150 recommendations to the relevant authorities and local self-government bodies to address the shortcomings identified during the monitoring visits. Of the **150** recommendations provided, **82** were implemented, **41** are in the process of implementation, and **27** have not been implemented.

2. Protecting the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances.

In 2025, the Ombudsman's Office in Kirovohrad region processed issues raised by servicemen, veterans, members of their families and persons liable for military service.

As of 31 December 2025, the Unified State Register of War Veterans in Kirovohrad region registered 57,993 persons, including

combatants - 44,669 people;

war veterans - 3,084 persons;

persons with disabilities as a result of war - 3,567 persons;

family members of deceased veterans and Defenders - 6,667 people;

affected participants of the Revolution of Dignity - 4 persons;

persons with special services to the Motherland - 2 persons.

Since May 2025, a regional working group of the Coordination Headquarters on the treatment of prisoners of war has been operating on the basis of the Ombudsman's Office in Kirovohrad region, whose powers extend to the territory of Kirovohrad and Cherkasy regions. During this time, **21** meetings were held with the families of prisoners

of war and those who went missing under special circumstances, with **917** people attending.

The main issues were related to the exchange process, the algorithm of actions in case of missing persons, and communication with the command and investigative bodies. Problems in this area of work include a low level of awareness among families, lack of communication and untimely provision of procedural documents by the command of military units.

Along with the work aimed at ensuring the rights of families of servicemen held in captivity or missing under special circumstances, in 2025 the Ombudsman's Office in Kirovohrad region paid special attention to the issues of observance of citizens' rights during mobilisation activities. The large number of appeals regarding violations of citizens' rights during mobilisation activities indicates the existence of problematic aspects in the activities of the territorial recruitment and social support centres in the region. These include, in particular, violations of the procedure for conducting mobilisation activities, non-admission of a defence lawyer, confiscation of personal belongings, and failure to respond to appeals.

3. Protection of the rights of persons affected by the armed aggression against Ukraine

An important area of work of the Ombudsman's Office in Kirovohrad region is protection of the rights of persons affected by the armed aggression against Ukraine. In 2025, the Office conducted **58** monitoring visits in this area: **51** monitoring visits on observance of the rights of internally displaced persons to proper living conditions at the ICC and **7** monitoring visits on the conditions of admission of applicants from the temporarily occupied territories through educational centres.

The team of the Ombudsman's Office in Kirovohrad region paid special attention to the availability of places and readiness of temporary accommodation to accept evacuees, including people with limited mobility.

At the end of 2025, **85,779** people were registered in Kirovohrad region.

internally displaced persons, according to the Department of Social Protection of the Kirovohrad Regional State Administration. Due to new waves of evacuations from frontline communities in the city and region, the number of temporary accommodation places is increasing, which necessitates additional monitoring.

During the monitoring visits to the ICC, a number of significant shortcomings were recorded that negatively affect the living conditions of internally displaced persons. These include insufficient material and technical support of the ICC, in particular, the lack or insufficient amount of furniture and household appliances, which complicates the provision of basic household needs of internally displaced persons.

There is also a lack of unimpeded access for people with disabilities and other people with limited mobility: there are no ramps, lifts, handrails, or adapted sanitary facilities. Most ICCs are not adapted to meet accessibility requirements and are architecturally inaccessible.

The outdated housing stock used to accommodate IDPs is in poor technical condition and requires major repairs. Inadequate sanitary and hygienic conditions have been recorded: in a number of dormitories, fungus and mould have been found in living rooms and common areas.

There were also violations of the procedure for financing IDPs' accommodation: accommodation in some TACs was provided on a paid basis, while the mechanism of state compensation for utilities was not applied. There was no reimbursement for utilities, and IDPs were forced to pay for utilities on their own.

All violations were recorded and reflected in reports and sent to the Kirovohrad Regional Military Administration.

Based on the results of the visits, 142 recommendations were made to the Kirovohrad Regional Military Administration to improve the living conditions of IDPs at the ICC. Of the 142 recommendations, **62** were implemented, **34** were in the process of implementation, and **46** were not implemented.

The Ombudsman's Office in Kirovohrad region conducted an on-site monitoring visit to the ICC at the dormitory of the municipal enterprise "Comfortable City" of the Dolyna City Council. During the visit, a number of violations were identified, namely: there was a significant amount of mould in the IDPs' living rooms; sanitary and hygienic rooms were not repaired; some IDPs' rooms were not equipped with furniture; the IDPs did not have detergents; the IDPs did not have irons and ironing boards; the IDPs did not have a room for leisure activities; the IDPs did not have a room for drying clothes.

Following the visit, the Ombudsman sent a response letter to the Kirovohrad Regional Military Administration. As a result of the measures taken, the rights of the TAC residents to proper living conditions were restored, namely: sanitary and hygienic rooms were renovated; all rooms were furnished; TAC residents were provided with detergents, irons and ironing boards; a room for drying clothes was equipped; and a room for IDPs' leisure activities was arranged.

The Ombudsman's Office in Kirovohrad region conducted 7 monitoring visits to the educational centres "Crimea-Ukraine" and "Donbas-Ukraine" at the higher educational institutions of Kropyvnytskyi. The monitoring visits revealed a number of violations by the educational centres of the conditions for admission of applicants from the temporarily occupied territories through the educational centres, namely: outdated

information on the conditions for admission through the educational centres was found on the official websites of higher education institutions; there is no information on the means of communication with the educational centres; there is no information on the work of the educational centres; there is no infographic on the procedure for admission through the educational centres; there is no information campaign on the benefits of admission through the educational centres;

Based on the results of visits to educational centres, **18** recommendations were provided, which were fully implemented.

The Ombudsman's Office in Kirovohrad region visited the educational centre based at Kherson State Agrarian and Economic University, which was relocated from Kherson to Kropyvnytskyi.

During the visit, a number of shortcomings were identified, namely: no up-to-date information on the work of the educational centre was posted; infographics on the procedure for admission through the educational centre were not developed and posted on the website of the educational institution in an accessible form; active phone numbers were not posted on the website of the educational institution; no information campaign on the benefits of admission through the educational centre was conducted; information on the activities of the educational centre "Crimea-Ukraine" and "Donbas-Ukraine" was not updated on the website of the educational institution; information on the activities of the educational centre "Crimea-Ukraine" was not updated on the website of the educational institution; and information on the activities of the educational centre "Donbas-Ukraine" was not updated on the website of the educational institution.

In order to restore the rights of applicants from TOT, the Commissioner sent a response letter to Kherson State Agrarian and Economic University. As a result of the measures taken, all the shortcomings were eliminated, and the educational institution sent a corresponding notification letter to the Ombudsman's Office in Kirovohrad region.

4. Protection of the right to life and safety of civilians under martial law

Lack of access to civilian protection facilities (shelters) in the context of Russia's armed aggression against Ukraine is a violation of the fundamental human right to life enshrined in Article 27 of the Constitution of Ukraine.

As of the end of 2025, there were **2,115** objects of the civil protection facilities fund in the region, including: **150** shelters, **502** anti-radiation shelters, **1,463** simple shelters (basements, rooms, etc.), which should provide a basic level of protection to the

population in case of emergencies or military threats (current information obtained from the website of the Kirovohrad Regional Military Administration).

In 2025, the Ombudsman's office conducted **44** monitoring visits to the facilities of the protective structures fund to check the condition of shelters, their accessibility and compliance with safety requirements.

The most common deficiencies identified were lack of or limited access to shelters, including locked premises during air raid alerts; non-compliance with accessibility requirements for people with limited mobility (lack of ramps, dangerous stairs, narrow passages); poor technical condition of premises, including problems with ventilation, lighting, high humidity and clutter; lack of or inadequate equipment of shelters (lack of benches, sanitary facilities, drinking water supplies); first aid kits are incomplete or contain expired medicines; lack of alternative evacuation exits or inadequate condition of emergency exits; inadequate information to the public about the actual location and condition of shelters.

The analysis of statistical data published on the official website of Kropyvnytskyi City Council revealed a number of systemic problems that directly affect the exercise of the right to safety and protection of life.

In particular, the analysis of the information on the list and addresses of civil protection facilities (shelters), which is publicly available on the official website of Kropyvnytskyi city council, showed that some of the published data is outdated and does not correspond to the actual state of affairs. During the inspection of individual addresses, it was found that some shelters are actually absent at the specified addresses or the premises cannot be used for their intended purpose due to their unsatisfactory technical condition, change of balance holder or re-profiling of the facility.

This situation indicates that the information provided by the local government to the public is not properly updated and verified. The availability of outdated or inaccurate information on shelters creates risks of misinformation of citizens who, during an air raid or other emergency, may spend critical time looking for a shelter that does not actually exist or is inaccessible.

In addition, the dissemination of outdated data on civil protection facilities in wartime can be seen as a factor that increases the threat to human life and health, especially for vulnerable categories of the population, such as children, people with disabilities, and the elderly. The lack of up-to-date information makes it impossible to effectively implement civil protection measures and contradicts the principles of openness, reliability and timeliness of informing the public.

Based on the results of monitoring **44** shelters and radiation shelters, the Kirovohrad Regional Military Administration received **107** recommendations to improve the condition of protective structures with a focus on public accessibility, technical

condition and compliance with the requirements of the State Building Code, of which **40** were implemented, **22** are in progress, and **45** have not been implemented.

The Ombudsman's Office in Kirovohrad Oblast conducted a scheduled monitoring visit to the civil protection facility (shelter) of the Bobrynets Hospital, a municipal non-profit enterprise of the Bobrynets City Council, which revealed a number of shortcomings: the entrance part of the shelter does not meet the requirements of the State Building Code in terms of accessibility for people with limited mobility; the shelter lacks drinking water supplies at the rate of at least 2 litres per person; the shelter lacks the necessary food supplies (long-term storage) in case of a long-lasting disaster.

Based on the results of the monitoring visit, a report with recommendations for their elimination was sent to the balance holder and the relevant competent authorities. As a result of the measures taken, the shelter was provided with the required amount of drinking water and long-term storage food. The issue of bringing the entrance part of the shelter into compliance with the requirements of the State Building Standards in terms of accessibility for people with reduced mobility was included in the Architectural Accessibility Programme for 2026 with the allocation of budget funds for the installation of ramps, lifts and unimpeded access to all communal facilities.

5. Implementation of the national preventive mechanism and human rights in places of detention

In 2025, the Ombudsperson's Office in Kirovohrad region conducted **14** monitoring visits to places of detention, including: Kropyvnytskyi Pre-trial Detention Centre, State Institution "Kropyvnytskyi Correctional Colony No. 6", State Institution "Petrivska Correctional Colony No. 49", Kropyvnytskyi Temporary Detention Centre No. 1, Police Department No. 2 of the Kropyvnytskyi District Police Department of the Main Police Department in Kirovohrad Region, Police Department No. 3 of the Kropyvnytskyi District Police Department of the Main Police Department in Kirovohrad Region, Municipal Institution "Kirovohrad Regional Psychiatric Hospital", Dolyna District Court of Kirovohrad Region.

During the visits to places of detention, the following violations were identified: the premises of places of detention in most cases do not meet the standards of DBN B.2.2-40:2018 "Inclusiveness of buildings and structures. Basic Provisions"; most of the premises where places of detention are located lack protective structures, which, in the event of an air raid, poses a threat to the life and health of persons held in the institution;

the rights of citizens to an adequate standard of living, including adequate food, clothing, and regular walks in the fresh air, are violated; the rights to observe the permissible area of residence/stay in rooms/cells are violated; violations of the right to professional legal assistance; a large number of expired medicines were found in the institutions; there are no injury logs; violations of the rights of wards to an annual medical examination by narrow specialists; geriatric institutions do not have special vehicles for transporting people with limited mobility.

The Ombudsman's Office in Kirovograd region conducted a monitoring visit to the geriatric institution of the municipal institution "Territorial Centre for Social Services (provision of social services)" of Ketrysanivska village council, where the monitoring group found a number of violations of the rights of the wards, namely the institution does not have an approved long-term menu, which makes it impossible to ensure a variety of dishes, calculate their energy value and balance the diet; the absence of screens in the living rooms where bedridden patients live, which does not ensure an adequate level of privacy during sanitary hygiene procedures; it was found that the wards were without any leisure time in their rooms; the building and premises of the institution do not meet the requirements of DBN B.2.2-40:2018 "Inclusiveness of buildings and structures. Main provisions".

Following the visit, the Ombudsman's Office in Kirovograd region sent a report to the competent authorities with recommendations to eliminate the shortcomings identified during the visit. As a result of the measures taken, the following shortcomings were eliminated: a prospective menu was approved; screens were installed in the living rooms where bedridden patients reside to ensure an appropriate level of privacy during sanitary and hygiene procedures; a leisure room was equipped.

In 2025, the Ombudsperson's Office paid special attention to monitoring visits to judicial institutions. During the monitoring visits, it was established that the vast majority of courts in Kirovograd region do not meet the requirements of paragraph 6.5.2 of the State Building Standards of Ukraine B.2.2-26:2010 "Buildings and structures. Courts", approved by the Order of the Ministry of Regional Development and Construction of Ukraine of 17.05.2010 No. 175. In violation of this paragraph of the State Building Code, most court premises are not equipped with rooms for lawyers to work with accused and defendants (convicts), making it impossible to exercise their right to defence.

There have also been violations of paragraphs 6.1.8 and 11.5 of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Basic Provisions", approved by the Order of the Ministry of Regional Development,

Construction, Housing and Communal Services of Ukraine No. 327 dated 30.11.2018, namely: there are no ramps, handrails, lifts, high thresholds, narrow doorways, etc.

It was also found that most court premises do not have their own shelter, which leads to a violation of citizens' rights to safe conditions of stay.

Based on the results of the visits to places of detention, the Mission provided **183** recommendations to the relevant authorities to improve the conditions of detention. Of the **183** recommendations, **50** were implemented, **41** were in the process of implementation, and **92** were not implemented.

6. Protection of information rights

Access to public information is one of the main activities of the Ombudsman's Office in Kirovohrad region. According to the Law of Ukraine "On Access to Public Information", state authorities and local self-government bodies are obliged to ensure openness of their activities, timely and fully publish public information, as well as properly consider requests for information from citizens.

In 2025, the Ombudsman's Office in Kirovohrad region carried out **6** on-site inspections on observance of human and civil rights to appeals and information, as well as **4** inspections in the field of personal data protection.

In addition, the Ombudsman's Office in Kirovohrad region monitored compliance with the rights of citizens to appeal provided for by the Law of Ukraine "On Citizens' Appeals" by state and local authorities. In 2025, violations of the legislation on citizens' appeals were revealed, in particular, the Ombudsman's Office in Kirovohrad region received 87 appeals from citizens regarding their untimely consideration, failure to provide answers or incomplete and formal answers. Such violations limit the constitutional right of citizens to effective protection of their interests and to receive proper information from state and local authorities.

In order to assess compliance with the legislation on access to public information and the exercise of citizens' right to appeal, the Commissioner's Office in Kirovohrad region conducted **7** on-site inspections of official websites of local self-government bodies of territorial communities in Kirovohrad region in 2025 on the observance of human and civil rights to appeal and information.

The inspections revealed systemic violations that complicate or make it virtually impossible to exercise citizens' rights to information, namely

absence or incomplete information on financial resources, budgets and their execution;

failure to publish general rules of work of local self-government bodies;
lack of reports on consideration of requests for information and citizens' appeals;
Lack of procedures for drafting and submitting requests for information, appealing against decisions of information holders, actions or inaction;

lack of contact details (phone numbers, email addresses), schedules of personal reception of citizens;

Lack of functioning hotlines and electronic forms for submitting citizens' appeals.

These shortcomings indicate the existence of systemic violations of the Law of Ukraine "On Access to Public Information" and the Law of Ukraine "On Citizens' Appeals", which limits the constitutional rights of citizens to effective access to public information and to receive timely and appropriate responses from state and local authorities.

In addition, there is no provision for the publication on the Unified State Web Portal of open data subject to disclosure in the form of open data in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 835 of 21.10.2015.

As a result of the response, the Commissioner's Office in Kirovohrad region sent response letters with explanations of the current legislation in the field of personal data protection and citizens' appeals following the citizens' appeals and on-site inspections.

As a result of on-site inspections, **43** recommendations were made, of which **22** were implemented and **21** were in the process of implementation.

Citizen M. appealed to the Ombudsman regarding violation of her right to a personal reception by the Deputy Mayor of Kropyvnytskyi City Council. To substantiate her complaint, the applicant stated that she had applied to the city council with a written application for a personal appointment with the Deputy Mayor of Kropyvnytskyi City Council. In response, the applicant was informed of the appointment and further notification of the date and time of the appointment. However, she did not receive any information about the possibility of a personal appointment for 4 months.

As a result of the Commissioner's response, letters were sent to the local self-government body explaining the requirements of the Law of Ukraine "On Citizens' Appeals" and suggesting that the applicant be provided with a personal reception.

As a result of the measures taken, the applicant was given a personal appointment with the Deputy Mayor of Kropyvnytskyi City Council, which took place the next day after the applicant received a response to her appeal.

Employees of the Ombudsman's Office carried out an on-site inspection of the website of the Oleksandrivska territorial community, during which they found a number of violations of the legislation on access to public information.

In particular, it was established that the requirements of Article 15 of the Law of Ukraine "On Access to Public Information" were not fully met, including in terms of publishing reports on satisfaction of requests for information; information on the activities of the authority, namely, communication numbers (the official communication numbers indicated on the official website did not work); the list and conditions for the provision of services, forms and samples of documents required for the provision of services, rules for their execution, etc.

Based on the results of the monitoring, a report with recommendations for eliminating the shortcomings identified during the monitoring was sent to the head of Oleksandrivka village council in Kropyvnytskyi district of Kirovohrad oblast. According to the letter from Oleksandrivka village council of Kropyvnytskyi district, Kirovohrad region, which was received by the Commissioner's Office in Kirovohrad region, all the shortcomings identified during the monitoring were eliminated, the official website of the Oleksandrivka territorial community was brought in line with the Law of Ukraine "On Access to Public Information", taking into account the Methodological Recommendations on filling official websites of executive authorities and local self-government bodies developed by the Commissioner of the Verkhovna Rada of Ukraine.

RECOMMENDATIONS:

Kirovohrad Regional Council:

to approve the regional Programme for Ensuring Architectural Accessibility of State-Owned Facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main Provisions";

to ensure full implementation of the Commissioner's recommendations on deinstitutionalisation of children from communal institutions of round-the-clock stay through the development and funding of the regional programme for the development of family-based care, creation of a network of foster families, ensuring housing and property rights of orphans and children deprived of parental care.

Kirovohrad Regional State Administration, Regional Military Administration:

to develop and submit for approval to the Kirovohrad Regional Council the Regional Programme for Ensuring Architectural Accessibility of State-Owned Facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate educational, healthcare and social protection institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main Provisions";

to strengthen the work on ensuring the readiness and accessibility of civil protection shelters in subordinate institutions by conducting a comprehensive audit of existing protective structures, developing plans for their modernisation and ensuring barrier-free access for persons with disabilities and low-mobility groups, in particular in educational, healthcare and social service institutions;

to conduct monitoring observations on the implementation of the requirements of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Basic Provisions" in places of temporary residence of internally displaced persons in terms of barrier-free access for persons with limited mobility and persons with disabilities and take measures to implement them;

ensure the implementation of the Resolution of the Cabinet of Ministers of Ukraine No. 261 of 11 March 2022 "On Approval of the Procedure and Conditions for Providing Compensation for Utility Services Consumed during the Accommodation of Internally Displaced Persons in Buildings (Premises) of State, Communal and Private Property during the Period of Martial Law" in places of temporary residence of internally displaced persons.

Local authorities of Kirovohrad region:

ensure a comprehensive audit of the architectural accessibility of all community facilities with the subsequent elimination of all identified problematic issues, with the prioritisation of facilities, specific deadlines, responsible persons and sources of funding with the possibility of attracting international technical assistance;

approve programmes for ensuring architectural accessibility of municipal facilities for 2026-2028 with the allocation of targeted budget funds for the installation of ramps, lifts, tactile elements, arrangement of universal sanitary facilities at and ensuring unimpeded access to buildings of territorial centres for the provision of administrative services, healthcare, education, culture and social protection institutions in accordance

with the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures";

to match the number of employees of the services for children of territorial communities with the number of children in the community in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children", to fill all vacant positions with qualified specialists to increase the institutional capacity of the services;

ensure that the information specified in the Law of Ukraine "On Access to Public Information" is published on the official websites of territorial communities, taking into account the Methodological Recommendations on the content of official websites of executive authorities and local self-government bodies developed by the Ukrainian Parliament Commissioner for Human Rights and the Ministry of Culture and Strategic Communications of Ukraine;

conduct an inventory of existing civil protection facilities (shelters, radiation shelters, simple shelters (basements, rooms, etc.);

Based on the results of the inventory, develop a Plan indicating practical approaches to eliminate violations of architectural accessibility of civil protection structures;

bring the technical condition of civil protection facilities to a satisfactory state, eliminate problems with: ventilation, lighting, high humidity and clutter. Provide drinking water supplies and first aid kits;

Improve the living conditions of internally displaced persons in temporary accommodation by carrying out major and minor repairs of residential premises and common areas in accordance with the Procedure for the functioning of temporary accommodation for IDPs (CMU Resolution No. 930 of 01.09.2023);

to provide temporary accommodation for internally displaced persons in accordance with the principle of universal design, equipping them with the necessary household appliances and furniture, taking into account the recommendations of the Ombudsman's Office in Kirovohrad region, with maximum involvement of support from international donors.

The Territorial Department of the State Judicial Administration of Ukraine in Kirovohrad region:

Ensure compliance with the requirements of paragraph 6.5.2 of the State Building Standards of Ukraine B.2.2-26:2010 "Buildings and structures. Courts", approved by the

Order of the Ministry of Regional Development and Construction of Ukraine of 17.05.2010 No. 175, namely: to equip court premises with rooms for the work of counsel with the accused, defendants (convicts);

to ensure the implementation of paragraphs 6.1.8 and 11.5 of the State Construction Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main Provisions", approved by the Order of the Ministry of Regional Development, Construction, Housing and Communal Services of Ukraine No. 327 of 30.11.2018, namely: to equip court premises with ramps, handrails, lifts, to resolve the issue of high thresholds, narrow doorways.

Services for Children of village, settlement and city councils of Kirovohrad region:

Ensure the realisation of property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities;

introduce systematic control over the preservation of the right of orphans and children deprived of parental care to housing;

ensure constant control over the establishment of guardianship over the property of orphans and children deprived of parental care;

to ensure proper maintenance and systematic implementation of individual social protection plans for each child in difficult life circumstances, orphan, child deprived of parental care, with mandatory monitoring of the achievement of the set goals and involvement of interdisciplinary teams for comprehensive support of the child;

to intensify work on the creation and development of family-based forms of upbringing in each community of the region through the formation of a network of foster families, adoptive families, guardians, to introduce systematic informing the population about the possibilities of family-based upbringing, organising training and support for foster parents to ensure the right of every child to be brought up in a family environment.

Centres for the provision of social services of village, town and city councils of Kirovohrad region:

Ensure systematic execution of contracts for the provision of social services with foster families and families under social support;

to ensure control over the decision-making on social support for families (individuals) in difficult life circumstances;

ensure the implementation of the creation and functioning of a mobile team of social and psychological assistance to victims of domestic violence and/or gender-based

violence in accordance with the Model Regulations on the Mobile Team of Social and Psychological Assistance to Victims of Domestic Violence and/or Gender-Based Violence, approved by the Cabinet of Ministers of Ukraine on 22 August 2018, No. 654.

11.12. Lviv Region

During the period from 1 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **6,592** appeals from Lviv region, which contained **7,933** reports of human and civil rights violations.

The geographical and geopolitical location of the Lviv region determines its special place in the system of human rights protection under martial law. The region is Ukraine's main "gateway" to the European Union member states: the main transport and logistics corridors for the movement of humanitarian goods, international missions, diplomatic delegations and representatives of international organisations run through its territory. This circumstance leads to increased attention of the international community to the human rights situation in the region and determines the special responsibility of state authorities and local governments in this area.

The armed aggression of the Russian Federation has led to large-scale internal displacement: Lviv region has received one of the largest numbers of internally displaced persons among all regions of the country, which has significantly increased the burden on social infrastructure and public services. At the same time, the region has faced a significant increase in the number of appeals from military personnel, veterans, persons liable for military service and family members of persons held captive by the Russian Federation or missing under special circumstances. The introduction of restrictions in the field of education related to the security situation has led to the transition of a significant number of general secondary education institutions to a full-time format, which, in turn, has put on the agenda the issue of ensuring proper and safe conditions for children to receive education.

In such circumstances, ensuring human rights protection in Lviv region requires a comprehensive and multisectoral approach that takes into account both the national context of martial law and the specifics of the region as an international transit hub and a territory with an increased humanitarian burden.

The number of	2022	2023	2024	2025
Citizens' appeals	1 789	4 718	6 275	6 592
Reports of rights violations	2 395	5 720	6 977	7 933

Among the most frequently mentioned human rights violations in the reports were: civil rights - **5,432** reports, social rights - **587** reports, economic rights - **393** reports, personal rights - **226** reports, children's rights - **213** reports, freedom from discrimination - **140** reports, political rights - **6** reports.

The Ombudsperson's representative in Lviv region drew up 6 reports on administrative offences: 4 - under Article 188-40 of the Code of Ukraine on Administrative Offences (failure to comply with the legal requirements of the Ukrainian Parliament Commissioner for Human Rights) and **2** - under Article 212-3 of the Code of Ukraine on Administrative Offences (violation of the right to information and the right to appeal).

The Ombudsman made **3 submissions** in connection with the identified violations of human and civil rights and freedoms by state authorities, local self-government bodies, institutions, organisations and enterprises.

Monitoring visits/on-site inspections

One of the priorities of the Ombudsman's Office in Lviv region is **monitoring of observance of citizens' rights** by state authorities, local self-government bodies, institutions and organisations. In 2025, the Ombudsperson's Office carried out **224 monitoring visits, visits and inspections** in various areas of ensuring observance of human and civil rights and freedoms.

In the area of implementing the functions of the national preventive mechanism and observing human rights in places of detention, **13** monitoring visits were carried out.

In the area of child protection, **60** monitoring visits were conducted in 2025, aimed at observing the property and housing rights of children in difficult life circumstances, as well as ensuring the right to family upbringing. Particular attention was paid to the observance of children's rights to a safe educational environment in the activities of educational institutions in Lviv region.

In the area of protection of the rights of internally displaced persons, **72** monitoring visits were carried out to check living conditions, access to social services and observance of other rights of internally displaced persons. **11 visits** to the educational centres "Crimea-Ukraine" and "Donbas-Ukraine".

In the area of ensuring equal rights and combating discrimination, 3 monitoring visits were conducted to check the architectural accessibility of social infrastructure facilities for people with disabilities and other low-mobility groups, as well as **13** monitoring visits to verify the observance of human and civil rights and freedoms, including the rights of national minorities (communities).

In the area of protection of citizens' information rights, **four inspections** were carried out to **verify** compliance with the requirements of the legislation on personal data protection.

In the context of martial law, special attention was paid to monitoring civil protection facilities: **48** visits were carried out to assess the possibility of using shelters

for the protection of the population and to monitor the facilities of the protective structures fund.

Educational activities

In 2025, the Ombudsman's Office held **129 educational events** in the form of trainings, lectures, seminars and roundtables. The topics covered included personal data protection, access to public information, rights of servicemen and their families, children's rights, anti-discrimination, accessibility, the Ombudsperson's activities, the national preventive mechanism and other relevant human rights issues.

A separate area of awareness-raising activities was the study of the issue of introducing the school ombudsman institution: organisational and preparatory measures were taken and relevant letters were sent, which creates the basis for the practical implementation of the School Ombudsman project in 2026.

The main issues addressed by the Ombudsperson's office were

- protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in captivity or missing in action under special circumstances
- protection of children's rights;
- observance of human rights in places of detention;
- ensuring the right to a fair trial;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- prevention of discrimination and harassment in higher education institutions;
- protection of citizens' information rights.

1. Protecting the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in captivity or missing in special circumstances

In the context of military aggression, families of servicemen who went missing under special circumstances or are in captivity in the Russian Federation face numerous challenges: difficulty obtaining information about the fate of their relatives, bureaucratic obstacles in calculating statutory payments, difficulties in interacting with military units and lack of sufficient legal support at the local level.

Unlike other regions, where separate regional working groups have been established to coordinate such work, the Ombudsperson's Office in Lviv region carries out these functions on the basis of the Coordination Headquarters for the Treatment of Prisoners of War. Started in 2025, the practice of on-site meetings directly in territorial communities has become a permanent part of the work of the Ombudsperson's Office.

The analysis of appeals and direct work with families of servicemen showed a low level of awareness of this category of citizens about their rights. In particular, about the mechanism of registering a personal account on the website of the Coordination Headquarters for the Treatment of Prisoners of War, the procedure for conducting portrait

and photographic examination at , the algorithm for searching for a missing serviceman, and the procedure for applying for social benefits provided for by law. Families living in rural and settlement communities were deprived of the opportunity to receive prompt legal assistance due to the territorial distance from the regional centre. The identified demand for systemic legal support directly at the place of residence became the basis for the introduction of the practice of on-site meetings.

Since 2025, the Ombudsman's Office in Lviv region has introduced the practice of regular on-site meetings with families of servicemen directly in the territorial communities. In 2025, **39** meetings were held in **28** territorial communities of the region. Most meetings were held at the Lviv Regional Military Administration and the Coordination Headquarters for the Treatment of Prisoners of War. Representatives of the Coordination Headquarters, the Commissioner for Persons Missing in Special Circumstances, regional and district recruitment and social support centres, the pension fund, law enforcement agencies, the International Committee of the Red Cross, UNHCR, as well as NGOs such as Free All, Rockada, Children of Heroes and others were involved in the meetings.

Lviv region is one of the regions where the issue of **veterans' rights** has become particularly acute. Since the beginning of the full-scale invasion, the region has received a significant number of demobilised and wounded servicemen, and a significant part of the logistics associated with the rotation of personnel passes through Lviv. As of the end of 2025, there were **118,000** war veterans, persons with special services to the Motherland, injured participants in the Revolution of Dignity and family members of the fallen defenders of Ukraine in Lviv region. At the same time, an analysis of the applications received by the Mission showed that veterans do not know what benefits, compensation and services they are entitled to, where to apply and how to complete the necessary documents.

In March 2025, in preparation for the development of information materials, the representative office conducted an analytical study - an actual audit of the state of veterans' policy in the territorial communities of Lviv Oblast. The results showed that **46** of the **73** territorial communities surveyed had no responsible persons for the implementation of veterans' policy. This means that a veteran returning to his or her home community has no one to turn to for help at the local level - responsibility is scattered among different units or is not assigned to anyone. In fact, the primary level of support, the closest to the individual, is the weakest.

In order to eliminate the information vacuum, the Mission initiated the development of a veteran's handbook "Your Status is Your Strength". The document contains step-by-step instructions on how to obtain veteran status, access to benefits, compensation, services and programmes of the state and territorial communities; the procedure for obtaining medical, psychological and legal assistance; rehabilitation, employment and training opportunities.

The guide was presented in March 2025 at the All-Ukrainian Forum "Veteran's Path: Restoration, Implementation, Success", organised by the Mission together with the NGO "Centre for Support of Veterans and Social Initiatives" of Ivan Franko National University of Lviv. The event was attended by Ukrainian MPs, representatives of state and local authorities, veteran communities and international partners.

The presentation of the handbook gave impetus to the replication of the practice at different levels. Territorial communities in Lviv Oblast, including Lviv and Novoyavoriv city communities, have developed their own roadmaps for veterans, taking into account local resources and programmes. Similar initiatives have been launched in other regions of Ukraine, using the guide as a methodological basis for their own information materials. Thus, the regional initiative of the representative office has been transformed into a national practice, and the audit of the state of veterans' policy in the communities of Lviv region was the first such study in the region, the results of which clearly demonstrated the need to appoint those responsible for veterans' policy at the level of each community.

2. Protection of children's rights

The full-scale military aggression has had a significant impact on the realisation of children's rights in Lviv region. In 2025, the Ombudsperson's Office conducted **60 monitoring visits** to children's services, general secondary education institutions, educational and rehabilitation centres, special schools, centres for social and psychological rehabilitation of children, orphanages, recreation and health facilities, and held **18** awareness-raising events on child rights protection. The monitoring revealed violations of children's rights in various types of institutions.

In educational and rehabilitation institutions, insufficient material and technical support, lack of shelters or their unsatisfactory condition, and failure to provide children with special educational needs with appropriate learning conditions and correctional support were recorded.

Critical violations were identified in recreation and health facilities: poor sanitary conditions of premises, lack of adequate medical care, inadequate catering without observance of food storage and quality control standards, lack of approved leisure programmes and qualified staff.

In the children's services, there were reports of failure to take measures to ensure the housing and property rights of orphans and children deprived of parental care; improper maintenance and implementation of individual social protection plans; and staffing levels not meeting the ratio of one employee to no more than 1,000 children.

As of 31 December 2025, 235 people actually worked in the services of city, village and settlement councils out of a staffing level of 287; only 29 out of 56 staff members were replaced in the services of district administrations. The services for children of Khyriv and Radekhiv city councils and Rozvadivka village council still do not have the status of a legal entity. Based on the results of the monitoring, recommendations were made to the relevant local authorities, which are being implemented.

During a monitoring visit on 16 September 2025 to the preschool education institution No. 5 of the Lviv City Council, the Commissioner's office found that child L. with severe musculoskeletal disorders (flaccid paraplegia, scoliosis, inability to move independently) systematically did not receive proper attention from her mother. The fact of neglect had not been recorded by the children's service at the time of the visit.

Based on the results of the identified violation, the Representative of the Ombudsman immediately sent a notice to the Department of the Children's Service of

Shevchenkivskyi district with a request to take response measures and register the child. As a result of the response, the child was registered as a child left without parental care; the issue of deprivation of parental rights was initiated in September 2025 and considered at a meeting of the Commission for the Protection of Children's Rights on 2 October 2025. The conclusion on the expediency of filing an application with the court was prepared on 23 October 2025; a court decision was made in absentia to terminate the mother's parental rights. The child continues to be in the inclusive group "Zirochki", where significant progress in rehabilitation is recorded. The child's right to protection from abuse and proper care has been restored.

A key element of the office's work in 2025 was to ensure the social rights of families with children, including the right to receive timely state aid. The analysis of appeals showed a systemic problem: families entitled to state social assistance for the care of a child with a disability face significant delays in its appointment due to the processing of applications on an extraterritorial basis in a single queue in the Unified Social Information System - a citizen's appeal is processed not by the local Pension Fund unit, but by any other unit in the general queue, which makes it impossible to respond promptly.

The Ombudsman received a complaint about inaction and violation of the terms of consideration of an application for state assistance for caring for a child with a disability. The applicant submitted an official application on 9 October 2025 via the Pension Fund of Ukraine's web portal for state childcare assistance for a child with a disability, but did not receive a proper response for more than two months. The applicant then turned to the Ombudsman.

As a result of the complaint consideration, inquiries were sent to the Main Department of the Pension Fund of Ukraine in Lviv region regarding the issues raised in the complaint. In its response, the Pension Fund of Ukraine reported that the applicant's appeal was in the Unified Social Sphere Information System and was processed on an extraterritorial basis in a single queue.

After the Ombudsman's representative sent a request to the Main Department of the Pension Fund of Ukraine in Lviv region, the documents were promptly processed and the state social assistance was accrued to the person caring for a child with a disability. A letter from the Main Department informed the applicant of the benefit, and the applicant confirmed its payment. Thus, the right to receive state social assistance was restored.

An important area of work for the Ombudsman's Office was monitoring the conditions of detention of children in institutional facilities and control over the implementation of recommendations. The office's approach involves not only recording violations, but also repeated targeted visits to check on the status of their elimination, which ensures real change rather than formal response.

In April 2025, the Ombudsman's Office conducted a scheduled monitoring visit to the Lviv Regional Council's municipal non-profit enterprise "Centre for Medical Rehabilitation and Palliative Care for Children", where 24 children with disabilities were

staying around the clock. The visit revealed violations of children's rights, in particular: the unsatisfactory condition of the premises at 2A Komarynets Street - mouldy walls, damaged sanitary facilities, improper storage of medicines, household chemicals and sharp objects in places accessible to children; lack of an access control system; improper storage of food without expiration dates; formal planning of developmental activities without approved programmes and the involvement of qualified specialists.

During 2025, the National Social Service of Ukraine in Lviv Oblast also conducted 2 inspections of the institution and 1 inspection with the participation of representatives of law enforcement agencies, the prosecutor's office, the children's service and health care.

In October 2025, the Mission conducted a second targeted monitoring visit to check the status of implementation of the recommendations. As a result of the response, the recommendations were fully implemented: the children were moved to a new location at 117 Antonovycha Street; a safety assessment of the new location was conducted; violations regarding the storage of medicines and household chemicals were eliminated; an access control and external video surveillance system was introduced; proper food storage was ensured; all 24 children have signed declarations with family doctors and individual rehabilitation programmes; 6 children attend kindergarten; individual development and social support plans were developed. Separately, deinstitutionalisation has been implemented: since April 2025, 15 children have been placed in family-based care, 8 children have returned to their biological families, and 25 children have been registered for adoption.

Based on the results of each visit, 60 response letters with reports were sent or memos were prepared, and **608** recommendations were made to the relevant authorities and institutions.

According to the available data of the preliminary monitoring of implementation, 144 of all recommendations provided have been implemented (23.7%), 442 are in the process of implementation (72.7%) and 22 remain unimplemented (3.6%).

3. Observance of human rights in places of detention

In 2025, the Ombudsperson's Office in Lviv region conducted **13** monitoring visits as part of the implementation of the national preventive mechanism to places of detention of various types: penitentiary institutions, temporary detention centres, psychoneurological boarding schools and orphanages.

The visits revealed 4 categories of systemic violations typical of places of detention. The most common violations include poor material and living conditions, lack of adequate medical care, problems with access to free legal aid, and non-compliance with accessibility requirements for persons with disabilities.

Based on the identified violations, **the Ombudsman** made **two submissions** to the relevant authorities regarding the activities of the Velykomostiv Geriatric Nursing Home and the Hruskivka Psychoneurological Boarding Home.

A total of **143** recommendations were made as a result of the NPM visits on the following issues: arrangement and equipment of protective structures in accordance with

regulatory requirements; ensuring accessibility of premises for people with limited mobility in accordance with DBN B.2.2-40:2018; organisation of proper medical care and rehabilitation measures; and equipping living rooms with call buttons for medical personnel. According to the results of the monitoring: 43 recommendations have been implemented (30.1%), 52 are in the process of being implemented (36.4%), 29 remain unimplemented (20.3%).

In October 2025, the NPM team of the Ombudsman's Office made a follow-up visit to the Municipal Institution of the Lviv Regional Council "Pidbuzky Geriatric Nursing Home". The reason was the results of the previous visit of 16 March 2023, which revealed violations of the rights to life and safety, health care, an adequate standard of living, accessibility for persons with disabilities and the right to free personal development.

Based on the results of the previous visit, recommendations were made to: refurbish the basement for sheltering the wards; ensure a barrier-free environment in accordance with DBN B.2.2-40:2018 and DBN B.2.2- 18:2007; comply with the standards of living space per person; ensure access to drinking water; organise rehabilitation measures; update individual rehabilitation programmes; monitor the shelf life of food; equip living rooms with call buttons for medical staff; update outdated transport equipment; and improve the quality of life for the wards.

Based on the results of the initial visit, the relevant recommendations were provided to the administration of the institution, the Lviv Regional Military Administration and the Lviv Regional Council. The implementation of the recommendations was constantly monitored by the Mission during 2023-2025.

*During the follow-up visit on 21 October 2025, **the full implementation of all recommendations** was found to **be in place** without any comments.*

In particular, the shelter was brought into compliance with the requirements of DBN B.2.2-5:2024; call buttons for medical personnel were installed in all living rooms; rehabilitation services were organised and individual rehabilitation programmes were updated; a new vehicle was purchased to transport the wards to medical facilities; living rooms were equipped in accordance with sanitary standards; the wards received proper medical care and balanced meals four times a day; leisure and development activities were organised.

The Commissioner's Office, upon request, conducts awareness-raising and consulting on barrier-free accessibility issues at the stage of planning and carrying out repair works, which allows taking into account accessibility requirements before the start of construction work. This helps to avoid violations before they occur, ensuring that the facilities meet national and international standards from the moment they are put into operation.

In 2022, the management of the Western Regional Directorate of the State Border Guard Service of Ukraine decided to overhaul the Temporary Detention Centre in Mostyska. In order to ensure that the facility complies with the requirements of national legislation and international human rights standards, the management of the institution turned to the Ombudsperson's Office in Lviv region for advisory support at the stage of

developing the design and estimate documentation. The Ombudsperson's Office provided conclusions and recommendations on bringing the design solutions in line with the requirements of the Standard Minimum Rules for the Treatment of Prisoners, the European Prison Rules and relevant provisions of Ukrainian legislation.

In November 2025, the NPM team of the Mission conducted a monitoring visit to the facility to verify that the conditions of detention met the established standards.

The visit found that the Temporary Detention Centre in Mostyska complies with the requirements of national legislation and international standards on the rights of persons deprived of their liberty. In particular, each cell is equipped with beds, furniture and a fully enclosed sanitary unit; the living space per person is at least 4 m²; there is unimpeded access to clean drinking water, an adequate level of natural and artificial lighting, the possibility of ventilation; the rooms have a wall radio and staff call buttons.

Medical examinations of detainees are carried out without the presence of guards in accordance with the requirements of the Nelson Mandela Rules; there is no video surveillance equipment in the cells. The facility is equipped with a separate room for persons with disabilities and low-mobility groups with ramps and handrails, a civil defence shelter for staff and detainees, and a backup power supply.

The monitoring activities of the Ombudsman's Office in the field of social protection revealed a systemic problem that had been ignored by the state authorities for years: the discrepancy between the normatively established level of remuneration of employees of social protection institutions and the actual volume of their workload and the social significance of their work. This discrepancy has a direct impact on the quality of social services and the exercise of the rights of the wards to proper care, medical assistance and an adequate standard of living guaranteed by Articles 46 and 49 of the Constitution of Ukraine. The evidence collected by the Ombudsman's Office became the basis for initiating the first review of remuneration standards for social sector workers at the state level in 20 years.

In 2024-2025, the Ombudsman's Office conducted monitoring visits to 13 social protection institutions in the region, where 1,910 people live and more than 1,200 employees provide social services.

The findings revealed that remuneration is regulated by Order No. 308/519 of the Ministry of Labour and Social Policy of Ukraine of 05.10.2005, which has not been revised for 20 years. The average salary of a nurse is 8-9 thousand hryvnias with a workload of 18 people in the day shift and 120 clients per employee in the night shift. Staff turnover is 25-30 per cent annually. This was confirmed by the heads of the institutions during the training within the framework of the project "Human Rights in Geriatric Institutions", which was organised by the Ombudsman's Office together with the Let's Help Charity Foundation on 17 June 2025. These analytical materials became the basis for preparing a draft appeal of the Lviv Regional Council to the Verkhovna Rada of Ukraine and the Cabinet of Ministers of Ukraine.

On 30 September 2025, the Lviv Regional Council adopted decision No. 655 and sent an appeal with proposals to legislate the increase coefficients, introduce additional expenditures through subventions, increase the basic increase from 25% to 50-70%, and

revise the staffing standard. The Verkhovna Rada Committee on National Health, Medical Care and Medical Insurance and the Verkhovna Rada Committee on Social Policy and Veterans' Rights supported this appeal and sent it to the government in their letters.

As a result of the work, on 27 December 2025, the Cabinet of Ministers of Ukraine adopted Decision No. 1750 on the application of a coefficient of 2.5 for providers of social and rehabilitation services from 1 January 2026. Salaries increased as follows: social manager - from UAH 8,243 to UAH 20,607, social work specialist - from UAH 6,773 to UAH 16,932.

4. Ensuring the right to a fair trial

Access to justice is a fundamental guarantee of human rights protection enshrined in Article 55 of the Constitution of Ukraine and Article 6 of the Convention for the Protection of Human Rights and Fundamental Freedoms. In 2025, the Ombudsperson's Office focused on two key aspects of this right: ensuring physical accessibility of court premises for all categories of the population and compliance with humane standards of detention of defendants during court hearings.

In 2025, the Mission conducted monitoring visits to **6** courts in Lviv region: Drohobych, Stryi, Starosambir City District, Horodok, Peremyshliany and Yavoriv District Courts. In **2** of the **6** courts inspected, the buildings were not originally intended to house judicial institutions, which leads to systemic non-compliance with the requirements of DBN B.2.2-26:2010 "Buildings and structures. Courts" and DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures". In all six courts, the absence or non-compliance with the standards of ramps, non-adapted sanitary facilities, and the absence of tactile elements for visually impaired persons were found. In **2** of the **6** inspected courts, courtrooms are located on the second floor without a lift, and there are no dedicated parking spaces for persons with disabilities. These violations make it impossible for persons with disabilities, the elderly and other groups with limited mobility to exercise the right to judicial protection guaranteed by Article 7(3) of the Law of Ukraine "On the Judiciary and the Status of Judges" and Article 9 of the UN Convention on the Rights of Persons with Disabilities.

Based on the results of the monitoring visits, the Office sent relevant reports to the Territorial Department of the State Judicial Administration of Ukraine in Lviv Oblast with recommendations for eliminating the identified violations. By the end of 2025, the SJA TU has allocated funds for repair work in courts to meet accessibility requirements.

The monitoring visit to the Starosambir City District Court revealed a complete non-compliance of the building's entrance group with the requirements of DBN B.2.2-40:2018: there was no proper ramp, the stairs did not have contrasting markings and handrails, there was no canopy over the entrance, and the sanitary facilities were not adapted for people with limited mobility.

Based on the recommendations provided by the office, the SCA financed and ensured the overhaul of the entrance group: a new ramp was installed in accordance with regulatory requirements with the proper angle of inclination, handrails and anti-slip

coating; the stairs were repaired with contrasting markings and handrails; and a canopy was installed over the entrance.

During its monitoring visits to courts under the national preventive mechanism, the Mission identified a systemic human rights violation: courts routinely place suspects and defendants in so-called "aquariums" - isolated structures made of organic glass and metal - instead of ensuring that they are close to their defenders. This practice prevents confidential communication between the defendant and the lawyer during the court hearing, which is contrary to the case law of the European Court of Human Rights.

5. Protection of the rights of victims of armed aggression against Ukraine

An important area of work at the regional level is the protection of the rights of persons affected by the armed aggression against Ukraine. As of 31 December 2025, according to the Ministry of Social Policy, Family and Unity of Ukraine, the number of internally displaced persons in the region was **202,068**.

During 2025, the Mission conducted **131 monitoring visits** in this area: **72** monitoring visits to observe the rights of internally displaced persons in places of temporary residence, **48** visits to the facilities of the protective structures fund and **11** visits to the educational centres "Crimea-Ukraine" and "Donbas-Ukraine".

The Mission carried out **72** monitoring visits and checked the temporary accommodation facilities for compliance with the Procedure for the Functioning of Temporary Accommodation Facilities for Internally Displaced Persons, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930. **37** out of **72** TACs visited by the ICC do not meet the minimum requirements for the life support of internally displaced persons. The main problems identified include the inadequacy of premises for persons with disabilities and low-mobility groups, the unsatisfactory condition of common areas and living rooms, the lack of household appliances and furniture, the high cost of renting housing and the insufficient formation of a housing stock for temporary residence of IDPs.

The monitoring visits resulted in **225 recommendations** addressed to the Lviv Regional Military Administration, directly to the owners of the shelters, and in some cases to local authorities. The recommendations are being implemented. According to the available monitoring data, out of all recommendations: 83 have been implemented (36.9%), 117 are in the process of being implemented (52%) and 25 remain unimplemented (11.1%).

The Ombudsman received an appeal from citizen O., forcibly displaced from Donetsk region, a resident of one of the MCCs of the region. In her appeal, the applicant complained that the MCC in which she lived was not adapted for persons with disabilities: the entrance group was not equipped with a ramp, the sanitary rooms were not adapted for people with reduced mobility, and the common areas were in poor condition.

The Ombudsman's Office sent relevant recommendations to the balance holder and the local authority. As a result, the issue of the entrance and bathroom was included in

the action plan for implementation in 2026. The applicant's right to proper living conditions is in the process of being restored.

In 2025, **48** monitoring visits were carried out to **the facilities of the protective structures fund** to check their condition, accessibility and compliance with safety requirements. Based on the results, reports were prepared and **129 recommendations** were made to improve compliance with the requirements for the maintenance and operation of protective structures. The recommendations were addressed to the Lviv Regional Military Administration, asset owners of the facilities, and local governments; all are being implemented.

The systemic problems identified include the lack of barrier-free access for people with reduced mobility, insufficient provision of first aid kits, chancing tools, food, drinking and industrial water. A separate problem is the lack of non-food items for children - diapers, toys, blankets - and hermetically sealed trash cans for sewage in 32 of the 48 shelters inspected, despite the presence of equipped bathrooms.

During a monitoring visit to one of the shelters in Lviv district, it was found that the facility, designed to shelter more than 200 people, had no first aid equipment, no stocks of drinking water and food, and no access for people in wheelchairs due to the lack of a ramp to the basement.

Following the Mission's recommendations to the balance holder and the local authority, work began on the construction of a ramp, purchase of first aid kits and water supplies. The implementation is under the control of the Mission.

The educational centres "Crimea-Ukraine" and "Donbas-Ukraine" operate in the region on the basis of higher and vocational higher education institutions, which provide assistance to applicants from the temporarily occupied territories through individual consultations on the specifics of the admission campaign, paperwork and support in choosing an educational institution. In 2025, **11** such centres were visited; the implementation of the 2024 recommendations was recorded, and applicants were provided with the necessary assistance. **9** out of **11** visited centres published information on admission conditions, contacts and forms of support for applicants from TOT of Ukraine on their websites.

6. Preventing discrimination and harassment in higher education institutions

The war has had a significant impact on the right to education, in particular, it has exacerbated the problems of psychological safety and protection from violence in the educational environment. In 2025, the Ombudsperson's Office focused on establishing institutional mechanisms to protect students from sexual harassment in higher education institutions in Lviv region.

In December 2024, Law of Ukraine No. 3733-IX came into force, introducing administrative liability for sexual harassment. Prior to the adoption of this law, higher education institutions were not actually obliged to establish internal procedures for

responding to such cases, and students and employees had no clear mechanism for protecting their rights. The absence of approved procedures and responsible persons led to the fact that harassment was either concealed or did not receive a proper response from the administration of the institution.

In February 2025, the facts of systematic sexual harassment of female students by a teacher of the Faculty of Journalism at one of the higher education institutions in Lviv region became public. The representative of the Commissioner in Lviv region sent letters to the Main Department of the National Police in Lviv region and the Commission on Academic Integrity and Ethics of the higher education institution demanding to verify the facts, provide official information on the available mechanisms for protecting students' rights and take appropriate response measures.

At the same time, the Ombudsman's representative publicly called on all persons who may have been affected to contact the Ombudsman for protection of their rights. In response, one of the victims applied to the Ombudsman's office; her application together with the materials was sent to the National Police for verification. As a result of the case review by the Commission of the higher education institution, the teacher was dismissed. The decision of the Halytskyi District Court of Lviv of 17 July 2025 dismissed the claim for reinstatement and recovery of average earnings during the period of forced absence. The Court of Appeal upheld the decision of the court of first instance, finding that the decision to dismiss was based on systematic violations of professional morality recorded in the complaints of the affected persons. This case revealed the lack of clear institutional mechanisms to prevent sexual harassment in higher education institutions.

The Mission responded to the legislative changes proactively - instead of waiting for complaints and responding to violations that had already been committed, a model draft regulation on preventing and combating sexual harassment was developed. In March 2025, the draft was sent to **18** higher education institutions in the region.

The preventive effect of this initiative is ensured through several interrelated mechanisms. Firstly, the approval of the regulations creates a clear legal framework: students and staff are informed in advance about what actions are recognised as harassment, what responsibility is provided for them, and where to go. The very existence of transparent rules changes the behavioural model in the team: the potential offender is aware of the inevitability of responsibility, and the victim knows that his or her complaint will be considered according to a clearly defined procedure. Secondly, the appointment of responsible persons in each institution eliminates the situation when a complaint gets "lost" in the administrative hierarchy or is transferred from one unit to another. Thirdly, trainings, seminars and lectures create a culture of intolerance to harassment - not only among students, but also among teaching and administrative staff, i.e. changing the environment systematically, not just in a targeted way. Fourth, the introduction of confidential complaint procedures reduces the psychological barrier to reporting: the victim does not face the risk of public disclosure or reprisals from the perpetrator, which is especially important in the context of unequal status between a student and a teacher or manager.

16 out of **18** institutions have approved new regulations or amended existing documents based on the Commissioner's recommendations. This initiative covers tens of thousands of students and staff of higher education institutions in Lviv region.

7. Protection of citizens' information rights

The exercise of information rights is an important component of a democratic society, especially under martial law. In 2025, most of the appeals received for consideration concerned the observance of citizens' rights to access public information and the right to appeal. The authorities and local self-government bodies are obliged to ensure proper implementation of legislation in this area, even in the presence of cases of abuse of the right to appeal. The Commissioner's Office regularly conducts training for government and local self-government officials on the application of the Law of Ukraine "On Access to Public Information". At the same time, the vast majority of appeals concerned violations of the deadlines for providing responses or unreasonable denials of access to public information, which indicates a systemic misunderstanding of the requirements of the law.

For 3 months, citizen P. had been trying to obtain information on the legal grounds and number of people receiving free coal from Lvivvuhillya. The company claimed that it did not have the information, as all documents had been handed over to law enforcement agencies in connection with criminal proceedings.

After the Commissioner's representative sent a request to Lvivvuhillya, it was established that the company had misled the complainant. Law enforcement agencies confirmed receiving only copies of documents, while the originals remained at the disposal of the company. The statement about the impossibility of providing information turned out to be false.

As a result of the Commissioner's representative's appeal, the company acknowledged the violation of the law and provided comprehensive information to the applicant.

In order to verify compliance with the requirements of the legislation in the field of personal data protection, in particular the Law of Ukraine "On Personal Data Protection" and the Commissioner's Order No. 1/02-14 dated 08 January 2014, the representative office conducted **4 scheduled inspections**. Each inspection revealed that the processing and protection of personal data was carried out in violation of the law; the relevant instructions were drawn up and a total of **12 mandatory recommendations** were provided.

Typical violations included: the absence of a designated person responsible for personal data protection; inadequate notification of personal data subjects of their rights and the purpose of processing; unlawful withdrawal of consent to the processing of data from own employees instead of determining the legal grounds; lack of internal procedures for data destruction after the expiry of their storage period. All identified violations have been eliminated, and the recommendations provided have been implemented in full within the established timeframe.

RECOMMENDATIONS:

To Lviv Oblast Council:

Ensure accessibility of municipal facilities and institutions for persons with disabilities and other low-mobility groups by approving the Regional Architectural Accessibility Programme for 2026-2028 with allocation of budget funds for installation of ramps, lifts, universal sanitary facilities, tactile elements and ensuring unimpeded access to all municipal property;

introduce standards of preventive monitoring of human rights observance in all municipal social protection institutions of regional subordination through the creation of internal control mechanisms, in accordance with the methodological recommendations of the Ombudsman's Secretariat on the implementation of the functions of the national preventive mechanism and ensuring systematic monitoring of the implementation of individual social protection plans;

continue to support the increase in salaries of social workers in municipal social protection institutions of the region by allocating additional funding to ensure competitive salaries, which will help to attract and retain qualified personnel in the field of social protection;

to develop a regional programme for the development of family-based care, the creation of a network of foster families, and the provision of housing and property rights for orphans.

Lviv regional state administration, regional military administration:

to create a regional programme for ensuring architectural accessibility of state-owned facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate educational, healthcare and social protection institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of the State Building Code B.2.2-40:2018 "Inclusivity of Buildings and Structures";

continue to improve the conditions of persons in the subordinate institutional institutions of social protection and healthcare (boarding schools, geriatric boarding houses, orphanages, psychoneurological boarding schools), taking into account the security situation, legal requirements, as well as the Standards of Social Services, DBN B.2.2-40:2018, and the recommendations of the UN Committee against Torture, and the relevant recommendations of the Commissioner provided as a result of previous monitoring visits within the national preventive mechanism;

to approve the regional standard of a safe educational environment for all educational institutions of regional subordination as a tool for the unified implementation of the requirements of current legislation, in particular the Procedure for Responding to Cases of Violence, approved by the Cabinet of Ministers of Ukraine on 19 November 2025 No. 1513, and the Procedure for Responding to Cases of Bullying (Harassment), approved by the Order of the Ministry of Education and Science of Ukraine on 28 December 2019 No. 1646;

to strengthen efforts to ensure the readiness and accessibility of civil protection shelters in subordinate institutions by conducting a comprehensive audit of existing protective structures, developing plans for their modernisation and ensuring barrier-free access for persons with disabilities and low-mobility groups, in particular in educational, healthcare and social service institutions;

bring the official website of the Lviv regional military administration in full compliance with the requirements of Ukrainian legislation on access to public information.

Local self-government bodies of Lviv region:

approve programmes for ensuring architectural accessibility of municipal facilities for 2026-2028 with the allocation of targeted budget funds for the installation of ramps, lifts, tactile elements, arrangement of universal sanitary facilities and ensuring unimpeded access to buildings of territorial centres for administrative services, healthcare, education, culture and social protection institutions in accordance with the requirements of the State Building Code B.2.2-40:2018 "Inclusivity of Buildings and Structures";

to ensure a comprehensive audit of the architectural accessibility of all community facilities with the mandatory use of the Accessibility Assessment Questionnaire (71 criteria) developed by the Commissioner's office at , followed by approval of a plan to remove barriers with the prioritisation of facilities, specific deadlines, responsible persons and sources of funding with the possibility of attracting international technical assistance;

align the number of employees of territorial community children's services with the number of children in the community in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children", ensure that the services are granted the status of a legal entity and fill all vacant positions with qualified specialists to increase the institutional capacity of the services;

bring official websites of territorial communities in full compliance with the requirements of the Law of Ukraine "On Access to Public Information";

adopt standard regulations on preventing and combating bullying, sexual harassment and violence in municipal educational institutions, defining clear detection procedures, response algorithms, victim support mechanisms, appointing responsible persons and introducing mandatory annual training for teaching staff in accordance with the requirements of the law;

ensure the readiness for use and full architectural accessibility of civil protection shelters by conducting an inventory of existing protective structures, identifying the need for their modernisation, developing and funding a plan to ensure barrier-free access to shelters for persons with disabilities and low-mobility groups, especially in educational, healthcare and social services;

Improve the living conditions of internally displaced persons in places of temporary residence by carrying out major and minor repairs of residential premises and common areas in accordance with the Procedure for the functioning of places of temporary residence of IDPs (CMU Resolution No. 930 of 01.09.2023).

Services for children of territorial communities in Lviv region:

Ensure the realisation of property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities, systematic monitoring of the right to use housing, establishing custody of the child's property and taking appropriate measures to assign alimony, collect it and monitor its intended use;

to ensure proper maintenance and systematic implementation of individual social protection plans for each child in difficult life circumstances, orphan, child deprived of parental care, with mandatory monitoring of the achievement of the set goals and involvement of interdisciplinary teams for comprehensive support of the child;

to intensify work on the creation and development of family-based forms of upbringing in each community of the region through the formation of a network of foster families, foster families, guardians, systematic informing the population about the possibilities of family-based upbringing, organising training and support for foster parents to ensure the right of every child to be brought up in a family environment;

to strengthen control over the protection of personal data of children registered by introducing clear internal procedures for processing personal data in accordance with the requirements of the Law of Ukraine "On Personal Data Protection", conducting staff training and systematic audits of compliance with the law.

Territorial bodies of central executive authorities in Lviv region (Main Department of the State Migration Service in Lviv region, Main Department of the Pension Fund of Ukraine in Lviv region, Employment Centres, Territorial Department of the State Judicial Administration of Ukraine, Western Interregional Department of the State Labour Service, Western Interregional Department of Justice, Main Department of the State Geocadaastre in Lviv region, Main Department of the State Tax Service in Lviv region, Main Department of the State Food Service) should ensure full architectural accessibility of their premises.

Ensure full architectural accessibility of the premises of all territorial bodies and subdivisions for persons with disabilities and low-mobility groups by conducting a comprehensive accessibility audit, approving modernisation plans with the definition of terms and sources of funding, installing ramps in accordance with the requirements of DBN B.2.2-40:2018, installing elevators in multi-storey buildings, creating accessible sanitary facilities, installing tactile elements for visually impaired persons, allocating parking spaces for persons with disabilities and ensuring safety

Strictly adhere to the deadlines for processing applications, appeals and inquiries of citizens stipulated by the legislation of Ukraine by optimising internal procedures, introducing an electronic filing system, expanding the possibilities of extraterritorial service, ensuring a sufficient number of qualified employees and implementing systems for monitoring compliance with deadlines to prevent violations of citizens' rights to timely services;

bring official websites in full compliance with the requirements of the Law of Ukraine "On Access to Public Information".

11.13. Mykolaiv Region

During the period from 1 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **4,473** appeals from Mykolaiv region, which contained **5,398** reports of human and civil rights violations. Most of the appeals and reports concerned human rights violations in the field of civil rights - **3,858** reports, social rights - **341** reports, freedom from discrimination - **228** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	1 058	2 685	3 597	4 473
Reports of rights violations	1 276	3 026	3 892	5 398

Mykolaiv region is a frontline region of southern Ukraine that has become a real outpost since the beginning of the Russian Federation's full-scale invasion of Ukraine, playing a key role in deterring armed aggression and providing humanitarian support to the population of the surrounding areas. Its geographical location between Odesa and Kherson regions makes it strategically important, but at the same time, it poses increased security challenges for the civilian population. The region has been in the zone of active hostilities and systematic shelling for a long time, which has caused significant damage to infrastructure, housing and social facilities. Even today, the region continues to face constant FPV drone attacks, shelling, and blocking of seaports, which requires constant adaptation of defence strategies, and leads to economic transformations in the context of significant business relocation and a high demand for investment in logistics and industry. In such circumstances, the activities of state authorities, local governments, human rights institutions and civil society representatives become critically important. Their effective and coordinated work determines not only the ability to respond promptly to existing human rights violations, but also to create systemic mechanisms for their prevention, strengthen community resilience and guarantee an adequate level of protection for the population in the context of full-scale armed aggression.

Monitoring visits/on-site inspections

Monitoring of observance of human and civil rights and freedoms by state authorities, local self-government bodies, institutions, organisations and other subjects of relations is a part of the activities of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Mykolaiv region.

In 2025, the Ombudsperson's Office in Mykolaiv region conducted **151** monitoring visits, in particular

18 monitoring visits were carried out in the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention;

2 monitoring observations of court hearings were carried out to ensure observance of the procedural rights of participants in the trial;

24 on-site inspections were carried out to assess the transparency of activities and compliance with legislation on access to public information and protection of personal data of state and local authorities;

12 monitoring of the observance of the rights of internally displaced persons in places of temporary residence for compliance with the standards set out in the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons" dated 01.09.2023

4 monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine" were conducted;

36 monitoring visits were conducted in the area of child rights protection;

7 monitoring visits were conducted in Mykolaiv region to determine the level of accessibility of social infrastructure facilities;

in the area of observance of veterans' rights - **4** monitoring visits;

1 monitoring visit in the area of healthcare facilities;

43 monitoring visits to civil protection facilities were conducted to provide recommendations for improving the conditions of maintenance and operation of protective structures.

Educational activities

In 2025, the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Mykolaiv region ensured systematic interaction with civil society institutions and public authorities on the implementation of veterans' policy and human rights protection.

In particular, **17** working meetings and joint events were held with civil society organisations working to protect the rights of veterans, their families and persons with disabilities. Such cooperation was focused on identifying current problems, developing common approaches to their solution and strengthening the human rights component in the field of veterans' policy.

In addition, the Mission organised and conducted **107** legal education events aimed at raising public awareness of the rights, social guarantees and mechanisms for their implementation for these categories of persons.

In the reporting year, two regional human rights conferences were organised, with special attention paid to current challenges in ensuring human rights and freedoms under martial law.

As part of its efforts to protect children's rights, on the occasion of International Children's Day, the regional office held a separate educational event at a general secondary education institution with a law profile for students in grades 10-11, dedicated to the rights and responsibilities of children. During the event, the School Ombudsman programme was presented, aimed at raising legal awareness among students, developing school mechanisms for protecting children's rights and creating a safe educational environment. This initiative is scheduled to be launched in Mykolaiv in 2026.

The main issues addressed by the Ombudsperson's Office were:

- Protection of children's rights;
- protection of the rights of internally displaced persons and ensuring their living conditions;
- protection of human rights in places of detention;
- protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances.

Protection of children's rights

In order to implement the function of parliamentary control over the observance of children's rights, the regional office staff carried out **36** monitoring visits, including **13** to the services for children of territorial communities in Mykolaiv region, **18** to general secondary education institutions and **5** to institutional care facilities.

Monitoring visits to community services for children in the region revealed systemic violations in their activities, namely: improper maintenance of personal files of orphans, children deprived of parental care and children in difficult life circumstances; improper maintenance, preparation and implementation of individual social protection plans for a child in difficult life circumstances, a child left without parental care, an orphan, a child deprived of parental care; lack of information on the protection of mothers and children in institutional care.

During the monitoring visit to the Service for Children of the Yuzhnoukrainsk City Council, the monitoring group identified a number of violations of the rights of vulnerable children. Було встановлено, що служба не здійснювала належним чином контроль за стягненням аліментів на утримання дітей, позбавлених батьківського піклування; не забезпечувала належне ведення особових справ дітей-сиріт, дітей, позбавлених батьківського піклування, та дітей, які перебувають в складних життєвих обставинах; не забезпечувала належне ведення, оформлення та виконання індивідуальних планів соціального захисту дитини, яка перебуває в складних життєвих обставинах, дитини, яка залишилася без батьківського піклування, дитини - сироти, дитини, позбавле

Based on the results of the report with recommendations, the Children's Service took measures to eliminate the identified violations:

- the personal files of orphans, children deprived of parental care and children in difficult life circumstances were brought in line with the requirements of the law;*
- ensuring that individual social protection plans for children in difficult life circumstances, children left without parental care, orphans and children deprived of parental care are properly drawn up and maintained;*
- the Service has established systematic accounting and control over the protection of property rights of children deprived of parental care, in particular, it has collected and summarised information on the availability of court decisions on the recovery of alimony; obtained data on the status of enforcement of such decisions; and taken response measures in cases of arrears in the payment of alimony.*

The regional office also identified typical violations of the law during monitoring visits to educational institutions, in particular

- Failure to ensure accessibility of shelters for persons with disabilities. Lack of ramps, metal ladders, special stair lifts, or other devices to overcome stairs, which leads to restrictions on students' right to education and free access to premises, including shelters;
- inaccessibility of sanitary facilities for people with limited mobility. The lack of adapted toilets in educational institutions causes humiliation, health hazards and discriminatory conditions for people with reduced mobility;
- inadequate premises of educational institutions to fully ensure inclusive education and equal access to educational services (lack of free independent movement of people with limited mobility);
- Lack of proper conditions for organising meals for students with special dietary needs (including children with medical conditions, food allergies, intolerance to certain foods);
- lack or insufficient stocks of long-term storage food in shelters. In case of prolonged stay in a shelter, a significant number of children are unable to meet their basic needs, which contradicts civil protection standards and violates children's right to a safe educational environment;
- lack of a licence to carry out medical practice. There are medical offices in educational institutions, but there are no registered licences for medical practice. In case of need for first aid to a child, such activities are actually carried out illegally, and the quality of medical care is not controlled by the state, which jeopardises the child's right to safe learning conditions, proper medical support and healthcare;
- shortcomings in ensuring transparency and openness of the educational institution, as the websites do not publish all the necessary information required by Article 30 of the Law of Ukraine "On Education".

During the monitoring visit to Mykolaiv Gymnasium No. 36, the team of the office found a number of violations, including insufficient stocks of long-term storage products in the shelter, lack of a medical practice licence, and shortcomings

in ensuring transparency and openness of the educational institution. In addition, expired medicines were found in the institution's medical centre and the right to privacy was violated in one of the sanitary facilities.

In response to the recommendations of the visit, the institution took measures to eliminate the violations, namely: established control over the activities of the medical unit; seized and transferred expired medicines for disposal in accordance with the established procedure; filed a petition for licensing for medical practice; took measures to organize the purchase of long-term storage food for shelter; ensured privacy in the sanitary and hygienic premises; placed information materials on the premises; and provided information on the situation of children's rights.

Based on the results of the monitoring visits, **237** recommendations were made to state and local authorities, institutions and educational establishments aimed at improving the observance of children's rights. Of these, **106** were implemented, and **131** recommendations are in the process of implementation.

Protecting the rights of internally displaced persons and ensuring their living conditions

As of 31 December 2025, according to the Mykolaiv Regional Military Administration, **120,545** internally displaced persons were registered in the region, of whom **33,252** were pensioners and **29,168** were children. Due to the continued arrival of IDPs, the number of people is dynamic and tends to grow.

There are **5** temporary accommodation centres in Mykolaiv region. In 2025, **12** monitoring visits were carried out to the TACs to verify the observance of IDPs' rights and compliance of living conditions with the requirements of the Procedure for the functioning of temporary accommodation places for internally displaced persons, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930.

The visits identified the following main problems insufficient number of household appliances in accordance with the number of residents (refrigerators, washing machines, electric stoves, kitchen utensils); lack of proper accessibility conditions for people with limited mobility (ramps, barrier-free access to sanitary facilities); technical malfunctions of engineering networks (power outages, malfunctioning generators, pumps, water supply and sewage systems); improper maintenance of the adjacent territory by the balance holders; insufficient arrangement of places for recreation and leisure for IDPs.

Based on the results of the monitoring, reports with recommendations to eliminate the identified violations and improve living conditions were sent to the balance holders, local authorities and Mykolaiv DMA. A total of **38** recommendations were provided: **14** of them were implemented, and **24** are in the process of implementation.

In July 2025, during a monitoring visit to the IDPs' place of temporary residence in Mykolaiv, a retired woman, the guardian of her grandson, a child deprived of parental care, came to the Ombudsman's representative for a personal appointment. The applicant reported that they were internally displaced persons from Kherson region. Their home was destroyed as a result of shelling, and as a result, the family lost their permanent place of residence and needed immediate housing. They were temporarily living with relatives at the ICC in Mykolaiv.

The family had previously been offered housing in another region of Ukraine, but it was in a state of disrepair and did not meet the minimum safety and habitability requirements, including the needs of the child. It was also established that the applicant's grandson had entered an educational institution in Mykolaiv. Due to their difficult financial situation, the family was unable to rent accommodation on their own. Appeals to the ICC administration and the executive bodies of the city council did not yield any results - the applicant received formal responses without resolving the issue. There was a risk of losing even temporary shelter and returning to uninhabitable housing.

Taking into account the vulnerable status of the family and the principle of ensuring the best interests of the child, the Ombudsman's representative

- Immediately requested information from the ICC administration and relevant structural units on the availability of vacant places and the grounds for refusal of accommodation;*
- provided legal explanations to the applicant on the guarantees of housing rights of IDPs and mechanisms for their implementation;*
- reconsideration of the issue was initiated, taking into account the status of the child deprived of parental care and the need to preserve the family environment;*

As part of the response, working communication was conducted with the executive bodies of the Mykolaiv City Council and their structural units to ensure that the family was accommodated in accordance with the law. As a result of the interaction, within a week of the appeal, a decision was made to place the female guardian and her grandson in a hostel, the ICC, where their close relatives already lived. This ensured the continuity of the family environment, the maintenance of family ties and proper living conditions.

As a result of the intervention, the family's right to housing was restored, the principle of the best interests of the child was ensured, and stable conditions for further social adaptation of internally displaced persons were created.

Protection of human rights in places of detention

The team of the regional office conducted **18** visits to places of detention: **12** - to courts; **3** - to boarding schools, boarding houses, inpatient care units; **3** - to police

care facilities; 3 - to the police.

The visits resulted in **117** recommendations, of which: **38** were implemented, **58** were in the process of implementation, and **21** were not implemented.

The monitoring visits revealed systemic violations of the rights of inmates of private and communal retirement homes for the elderly.

In **17** places of detention, there are no or inadequately equipped protective structures (shelters), as well as inadequate basements, which makes it impossible to ensure an adequate level of security for inmates and staff during air raids and shelling under martial law.

There are cases when legally capable persons do not give their personal informed consent to placement and stay in a boarding house. Agreements on the provision of social services are concluded with relatives without proper documentary evidence of their authority to represent the interests of their wards. The administrations of institutions do not require relevant supporting documents, which effectively limits the right of individuals to make independent decisions. In addition, in a number of institutions, the possibility of free movement is restricted for inmates - they are allowed to go to the yard or outside the institution only if accompanied by staff.

In most cases, individual plans for the provision of social services in residential care are not developed, which should be based on a comprehensive identification and assessment of the individual needs of recipients of social services, including palliative care needs.

The premises of institutions do not fully meet the needs of persons with disabilities and people with reduced mobility. Living rooms are often not equipped with call buttons for staff, and there are no handrails in corridors, bathrooms and ramps. Institutions where clients live above the first floor do not have lifts or other technical means of accessibility.

In 2025, the Ombudsman's Office conducted two monitoring visits to the private nursing home "Care Home" in Mykolaiv as part of the national preventive mechanism.

During the first visit, systemic violations of the rights of the residents were recorded, in particular with regard to proper living conditions, care, medical support, privacy, nutrition, and compliance with the requirements of the legislation in the field of social services. The monitoring group documented cases where some wards were administered potent psychotropic drugs without their informed consent and without proper medical indications to immobilise them for a long time and keep them in a state of medication-induced sleep.

In connection with the identified circumstances, the members of the monitoring group called the National Police of Ukraine directly during the visit and filed a statement about the alleged commission of a criminal offence. Based on the results of the review of the application, the information was entered into the Unified

Register of Pre-trial Investigations. As of the end of the reporting period, the pre-trial investigation was ongoing.

Based on the results of the first visit, a report was sent to the administration of the nursing home outlining the violations and recommendations for their elimination.

A follow-up monitoring visit was conducted seven months later to monitor the implementation of the recommendations. A comparative analysis of the results of the two visits showed positive changes that occurred after the intervention of the office and the institution's activities were in the field of increased attention.

The second visit revealed the following: partial streamlining of internal documentation and systematisation of wards' records, journals and individual files; improvement of the sanitary condition of residential premises and common areas; elimination of the most critical manifestations of unsanitary conditions recorded earlier; more organised food service, improved cooking and serving conditions; reduction of tension in the interaction between staff and wards, absence of pronounced signs of fear and depressed psychological state.

This case demonstrates that the consistent and principled activities of the office, the combination of preventive monitoring measures with prompt response to gross human rights violations, including by informing law enforcement agencies, as well as further monitoring of the implementation of recommendations, contribute to the cessation of dangerous practices and encourage institutions to gradually bring their activities in line with the requirements of legislation and human rights standards.

Protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances

The Ombudsman's Office carries out systematic work to inform family members of prisoners of war and missing persons about the mechanisms for protecting the rights and interests of Defenders, the procedure for interaction with public authorities and assistance in resolving problematic issues within the competence of the Ombudsman.

The regional consultancy centre of the Coordination Headquarters in Mykolaiv has a permanent position of the Chief Specialist of the Ombudsperson's Office in the system of security and defence sector bodies. Since May 2025, this official has also been a member of the reserve regional group of the Coordination Headquarters on the treatment of prisoners of war based at the office of the Commissioner for Persons Missing in Special Circumstances in Mykolaiv region, whose powers extend to the territory of Mykolaiv and Kherson regions, as well as the Autonomous Republic of Crimea.

In 2025, **33 meetings** were held with the families of prisoners of war and missing persons, involving **1,372** people.

In November 2024, a citizen R., a resident of Mykolaiv, mother of a Mariupol defender, asked the Ombudsman's representative to explain the algorithms of the authorities' work on returning her son from captivity.

During the conversation with citizen R., it turned out that the applicant had been orphaned as a child and received a 14 sq. m. room. After getting married and having children, she received two more adjoining rooms (15 and 10 sq. m.). The family has always lived in emergency housing and repaired it at their own expense. Since 2005, the area has been 39.2 square metres; as of the date of the application, the family has 11 children (four underage). The husband is a serviceman with a disability of group III due to a mine-blast injury, in need of treatment and proper conditions; three sons are combatants.

The Ombudsman's Office carried out an on-site inspection of the applicant's living conditions, sent a request to Mykolaiv City Council, and held a meeting with its management. The procedure for returning the son from captivity was also explained.

In the spring of 2025, after three years in captivity, the applicant's son was released during another exchange. Also, at the end of 2025, the family was provided with a four-room apartment under the Comprehensive Social Protection Programme "Care", by the decision of the Executive Committee of the Mykolaiv City Council. The measures taken helped to restore the rights of large families, ensure the rights of children to adequate housing conditions and social protection of servicemen and their families.

Amendments to the Procedure for the payment of financial support to servicemen captured or taken hostage, as well as interned in neutral states or missing, approved by Resolution of the Cabinet of Ministers of Ukraine No. 884 of 30 November 2016, became a significant challenge in 2025. These changes led to a review of previously adopted decisions on the calculation of financial support and created additional tension among family members. The systemic problems identified include: failure of military units to provide written responses on the decision to accrue or refuse to accrue part of the GS provided for in the Procedure for Payment of Financial Support to Servicemen Captured or Taken Hostage, Interned in Neutral States or Missing in Action; violation of the deadlines for reviewing relevant applications and documents; and an imperfect mechanism for redirecting applications from the CC and JV to military units for decision-making.

Other problematic issues that persist in the work with this category of the population are: lack of awareness of the algorithms for the exchange of prisoners of war and search for missing persons; failure to meet the deadlines provided for by the Law of Ukraine "On Citizens' Appeals" for the provision of information by military units; lack

of proper comprehensive interaction between individual bodies and levels of military command.

A citizen G. applied to the regional office of the Ombudsman for legal and advisory assistance in connection with the disappearance of her son, a serviceman of the Armed Forces of Ukraine. During one of the consultations it was established that she had been trying for a long time to register the right to use the housing in a communal dormitory in Mykolaiv community, in particular to obtain a special residence permit.

Employees of the regional office processed the materials, provided primary legal assistance in preparing applications and appeals, and took measures within their authority. As a result, the applicant's right was restored: a special residence permit was issued to her and her son by the decision of the Executive Committee of the Mykolaiv City Council, which helped restore social justice.

A separate priority area of work is processing appeals from war veterans and monitoring the implementation of veterans' policy in the region. Most of the issues raised by veterans and combatants related to legal support; medical and psychosocial rehabilitation; and ensuring prompt and accessible consideration of veterans' appeals.

At the same time, in the reporting period, the provision of services by veterans' support specialists was monitored. In connection with the ongoing development of veterans' spaces in Mykolaiv region and to identify systemic patterns and problems, **4** monitoring visits were made to veterans' spaces in the cities of Mykolaiv, Snihurivka, Bashtanka and Pervomaisk, respectively. The problems common to all districts are the lack of a unified regional strategy for the development of these spaces; insufficient funding for the development of veteran infrastructure in communities; staff turnover involved in the implementation of veteran policy; lack of a strategic vision for the development of relevant policies and regulatory gaps. Based on the findings of the visits, **3** recommendations were made and are being implemented.

RECOMMENDATIONS:

Mykolaiv Regional State Administration, Regional Military Administration:

Ensure that the institutions of regional subordination providing services to children comply with safety standards, sanitary and hygienic requirements and requirements for the organisation of medical care and nutrition;

to strengthen control over the implementation of measures by owners/balance holders to bring civil protection facilities in line with the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by the Order of the Ministry of Internal Affairs of Ukraine of 09 July 2018 No. 579;

Ensure architectural accessibility for persons with disabilities and other low-mobility groups to institutions and civil protection facilities of municipal and state ownership, primarily to healthcare, education and social facilities;

to ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, in particular those operating in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023, with the possibility of further confirmation of compliance with the established standards;

to ensure that the rights of residents in private and communal retirement homes for the elderly are respected through the proper implementation of legislation on social protection, medical care, creation of a barrier-free environment and guaranteeing the right to privacy and respect for dignity, with the introduction of mechanisms to prevent repeated violations;

ensure systematic interagency control over the observance of the rights of servicemen, veterans and their families, in particular with regard to social benefits, access to various types of services and the proper performance of their duties by specialists in supporting war veterans and demobilised persons in the communities of the region;

Local self-government bodies :

ensure proper arrangement of protective structures in pre-school and general secondary education institutions to ensure the safety of participants in the educational process;

to ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans;

to intensify work on the creation of family-based forms of upbringing in each territorial community as a priority model for the protection of children's rights;

to ensure barrier-free and accessible premises in territorial community institutions for people with disabilities and low-mobility groups by approving and implementing relevant action plans and identifying responsible persons;

to strengthen control over the technical condition of the premises of temporary accommodation centres (TACs) for internally displaced persons, as well as to ensure that their right to safe, proper and decent living conditions is respected in accordance with the established standards.

11.14. Odesa Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **8,112** appeals from Odesa region, which contained **8,356** reports of human and civil rights violations. The most common human rights violations mentioned in the reports include: civil rights - **5,462** reports, social rights - **558** reports, economic rights - **480** reports, and children's rights - **333** reports.

Number	2022	2023	2024 year	202 5 year
Citizens' appeals	2 014	4 910	7 273	8 112
Reports of rights violations	2 579	5 950	8 135	8 356

In the context of the full-scale armed aggression, Odesa region has found itself in a high-risk zone: according to the Order of the Ministry of Communities and Territories Development of 15.07.2025, 119 settlements in the region (including the cities of Odesa, Izmail, Bilhorod-Dnistrovskyi and the territories of six districts of the region) are officially classified as areas where hostilities are taking place. The situation is complicated by the systematic shelling of civilian and critical infrastructure, as well as the specific geographical location of the southwestern part of the region.

The destruction of the bridge over the Dniester estuary near the village of Zatoka has effectively turned the region into a semi-enclave, forcing citizens to use the transit section of the Odesa-Reni motorway through the territory of the Republic of Moldova (Mayaky-Palanca-Udobne section). These logistical and security challenges have created the preconditions for large-scale violations of fundamental human rights, including the right to life, security, free movement, housing and health, and have significantly increased the vulnerability of certain social groups. Overcoming these crisis phenomena requires state and local authorities to consolidate their efforts to implement systemic, human-centred strategies to protect the rights of citizens in the region.

Monitoring visits/on-site inspections

One of the key areas of activity is monitoring the observance of human and civil rights by state authorities, local self-government bodies, institutions and organisations in Odesa region.

In **2025**, the team of the Ombudsperson's Office in Odesa region carried out **332** monitoring visits, including **321** on-site and **5** off-site visits, and **6** unscheduled visits.

There were **129** visits in the areas of observance of the rights of internally displaced persons, **44** monitoring visits in the area of children's rights, **27** visits to places of detention, **4** monitoring visits in the area of social and economic rights, **122** monitoring observations of the observance of procedural rights of participants in court proceedings and **6** monitoring visits/on-site inspections in the area of information rights protection.

Educational activities

In order to raise the level of legal awareness of the population and to form a culture of respect for human and civil rights and freedoms, the Mission organised **201** legal awareness-raising events during the reporting period, in particular in the following areas: protection of information rights - **73**, protection of children's rights - **56**, protection of the rights of persons affected by the armed aggression against Ukraine - **36**, rights of national minorities, political and religious views - **27**; **9** within the framework of the national preventive mechanism. One of the important areas of activity was initiatives that promote the formation of legal culture from an early age and the sustainable development of human rights practices. Thus, for the first time in Odesa region, **the School Ombudsman** project was introduced, covering **205** schools in the region. Within the framework of the project, **4** outreach events were held and communication with mentors was established.

The Mission, together with its partners, launched a new project "**Safe Online: Stop Recruitment**", aimed at implementing targeted educational programmes on cyber hygiene, digital literacy and recruitment prevention among children and adolescents, as well as their parents and teachers. The project provides for a comprehensive approach and combines educational trainings, an information campaign, and work with youth ambassadors to ensure the sustainability of the results achieved.

The main issues addressed by the Ombudsperson's Office were

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances
- protection of children's rights;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the right to life and security under martial law;
- protection of the right to access public information and the right to appeal;
- protection of human rights in places of detention;
- protection of the right to a fair trial.

1. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances

Under martial law, one of the priorities of the Mission's activities was to ensure the exercise of the rights of persons missing under special circumstances and their families.

In order to ensure communication with the families of missing Ukrainian servicemen, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War (hereinafter - RWG) was established in Odesa region, which includes a representative of the Ukrainian Parliament Commissioner for Human Rights and the staff of the Mission.

In 2025, as part of the joint work of the Ombudsman's representative and the WG, **10 working meetings** were held with the participation of WG members, including representatives of military units of the National Guard of Ukraine, units of the State

Border Guard Service of Ukraine, the Ombudsman's Office for persons missing in special circumstances, the Ombudsman's Office, the Main Directorate of the Security Service of Ukraine, the Main Directorate of the National Police in Odesa region, the Odesa Regional Territorial Centre for Recruitment and Social Support

The Ombudsman's Office in Odesa region held **19** meetings with families of missing persons and prisoners of war, **1** of which was chaired by the Ukrainian Parliament Commissioner for Human Rights. A total of **644** people attended these events.

In addition, the Mission held **144** individual receptions of citizens - family members of the deceased and missing persons.

Most of the questions concerned the following: establishing the whereabouts of a missing serviceman; providing assistance in appointing and receiving payments provided for by law for families of servicemen and prisoners of war; receiving consultations in connection with the lack of proper interaction with the TCC and JCC, military units and local authorities; applying for and receiving social and pension payments; interaction with territorial communities to receive assistance at the local level; observance of the measures of security and safety.

During the on-site visits to Bilhorod-Dnistrovskyi and Bolhradskyi districts, the Ombudsman's representative identified a systemic problem of insufficient level of veteran support specialists.

Following the working meetings of the Ombudsman's representative with the leadership of the Bilhorod-Dnistrovskyi and Bolhradskyi district military administrations, the issue of providing support specialists for war veterans and demobilised persons was resolved in **5** communities.

As of December 2025, every community in Odesa Oblast (**91** communities) was provided with a veterans' support specialist. This has created the necessary conditions for veterans to properly exercise their rights to social and administrative services, as well as to provide institutional support for Defenders at the community level.

During a personal reception, the representative of the Ombudsman in Odesa region received a request from a citizen D., who is an active serviceman and had been injured in the left lower limb. At the time of the appeal, the serviceman was undergoing a rehabilitation course in a military hospital, where medical staff prepared the necessary documents for an assessment of daily functioning in order to further establish the status of a person with a disability and dismissal from service in the Armed Forces of Ukraine.

At the same time, citizen D. was unreasonably denied the status of a person with a disability, despite the fact that he uses a wheelchair.

Following the intervention of the Ombudsman's representative, the Department's management made an appointment for citizen D. to visit the structural unit of the Department of Health and the Department of Social and Family Policy of the Odesa Oblast State Administration, and also arranged a meeting with a veterans' support specialist.

As a result of the measures taken, the applicant's case was reconsidered, which resulted in a positive decision to grant citizen D. the status of a person with a disability.

In order to increase the level of interaction between the authorities involved in mobilisation activities, the Mission regularly carries out coordination activities aimed at establishing effective interaction with the relevant authorities and conducting explanatory work.

In 2025, the Representative of the Commissioner in Odesa region held **9** meetings with the management of the Odesa regional CCC and JV, the Main Department of the National Police in Odesa region, the Odesa Zonal Department of the High Court of Justice and the Southern Interregional Centre for Free Legal Aid.

During these events, the issues of unlawful non-admission and obstruction of the activities of lawyers, violation of the rules of mobilisation, use of force, etc. were discussed.

As a result of the work done, a systematic interagency interaction was established between the bodies involved in the implementation of mobilisation activities, cooperation was organised to ensure compliance with the requirements of the law during their implementation, and an operational exchange of information was ensured between the Odesa Regional CCC and JV, the Main Department of the National Police in Odesa Region, the Odesa Regional Prosecutor's Office, the Odesa Zonal Department of the High Specialized Court and the Southern Interregional Centre for Free Legal Aid. The measures taken contributed to raising the level of legal culture and ensuring a balance between the fulfilment of mobilisation tasks and the observance of human rights and freedoms.

At the same time, the issues of human rights observance during mobilisation activities in the region remain relevant and continue to be monitored by the Ombudsperson's representative.

In 2025, the Ombudsperson's Office in Odesa region received 112 appeals regarding alleged human rights violations during mobilisation activities. Based on the results of systematic monitoring of mass media and Internet resources, the Office in Odesa region in 2025 identified **8** high-profile cases of alleged violations of citizens' rights during mobilisation activities.

In order to establish objective circumstances and prevent violations of constitutional rights and freedoms, the Ombudsman's Office sent 244 letters to the

Ministry of Defence of Ukraine, the Main Department of the National Police in Odesa region and the Odesa Regional CCC and JV. As a result of the response, the rights of eleven applicants were restored.

The Ombudsman was approached by the leadership of the Kubey village council of Bolhradskyi district, Odesa region, representing the interests of citizen D., a person with a childhood disability with mental disorders. Upon his appeal, it became known that citizen D. was detained by the Bolhrad District TCC and JTF, and later mobilised into the Armed Forces of Ukraine.

As a result of the response of the relevant Department and the Ombudsman's representative in the region, documents confirming the presence of a disability in the mobilised citizen D were sent to the military unit.

Subsequently, citizen D. was sent for a second military medical examination, which resulted in his dismissal from the Armed Forces of Ukraine.

2. Protection of children's rights

In order to properly exercise parliamentary control over the observance of children's constitutional rights and freedoms, the Ombudsperson's Office in Odesa region conducted **44** monitoring visits to **8** educational institutions, **19** children's services, **15** social service centres, **1** centre for social and psychological rehabilitation of children, and **1 healthcare** institution (children's department).

Based on the results of the monitoring visits, **279** recommendations were made to state and local authorities, institutions and educational establishments aimed at improving the observance of children's rights. All **279** recommendations are in the process of being implemented.

The entity that is obliged to guarantee comprehensive, timely and priority protection in the best interests of the child is the Service for Children. However, its activities continue to be critically affected by insufficient staffing, which does not meet the requirements of current legislation. This leads to disruptions in the organisation of the Commission for the Protection of Children's Rights and the work of the Interdisciplinary Team for the Organisation of Child Social Protection.

In addition, the interaction of children's services with educational institutions and law enforcement agencies is complicated. This violates a child's right to be brought up in a family environment and complicates the process of early identification of children in difficult life circumstances, social orphanhood or abuse.

Based on the results of visits to **19** children's services, systemic violations of children's rights were recorded in **15** of them: inconsistency of staffing levels with legal standards; improper maintenance of personal files; and limited access to information about services.

During the monitoring visit to the Service for Children of the Pivdenne City Council of Odesa District, Odesa Region, violations of the legislation on granting the status of a child affected by hostilities and armed conflicts (hereinafter referred to as the Status) were identified.

In particular, in 2024, the Executive Committee of the Pivdenne City Council decided to refuse to grant the status to a young child Z., born in 2022. The Service's specialists explained that the refusal to grant the status was based on the child's lack of internally displaced person status. At the same time, representatives of the Service did not provide evidence of a comprehensive analysis of other grounds for granting the status and did not report on the measures taken to ensure the child's rights.

The monitoring group found that the decision was based solely on the fact that the child was not an internally displaced person, which unlawfully narrows the grounds for granting the status; the fact that the mother was in the conditions of hostilities during pregnancy was not taken into account; citizen L. was not informed about the possibility of obtaining a conclusion on the assessment of the need for social services; the possibility of attaching the conclusions of a psychologist, psychotherapist or other specialist was not taken into account; there was no provision for referral to the relevant institution for rehabilitation and social services.

This case demonstrates a formal approach to the consideration of applications and improper application of the current legislation on the protection of the rights of children affected by hostilities.

Based on the results of the identified violations, the Ombudsman's Office sent a letter to the Pivdenne City Council with recommendations to eliminate the violations and prevent them in future activities. On 15 May 2025, at a meeting of the Commission for the Protection of the Rights of the Child of the Executive Committee of the Pivdenne City Council, the recommendations of the monitoring visit were discussed and measures to address the shortcomings were identified. As a result of the recommendations, the child's right to establish the status of a victim of hostilities and armed conflicts was restored.

Special attention was paid to the observance of the child's right to a safe educational environment. Based on the results of **8** monitoring of educational institutions in Odesa region, it was found that the most typical violations of children's rights are

- absence or incomplete provision of barrier-free access in 5 educational institutions;
- insufficient equipment of shelters in 4 educational institutions;
- violations in the organisation of meals, lack of a developed dietary menu for children with special dietary needs in 6 educational institutions;
- non-compliance of sanitary rooms with the requirements to ensure safe and hygienic conditions in 4 educational institutions;
- non-compliance with the requirements for the organisation of medical care for students in all 8 educational institutions.

In the context of martial law, the return of orphans and children deprived of parental care from abroad requires enhanced state control. Of particular relevance is the issue of latent violence in family-based care, which has long been outside the jurisdiction of

Ukrainian regulatory authorities. The case recorded in Odesa region shows that insufficient supervision of the conditions of children's stay in third countries can contribute to the creation of preconditions for malicious failure to fulfil guardianship duties and violence against children.

The Mission initiated proceedings on the facts of ill-treatment of 14 children who were under the care of citizen P. in Vietnam and Egypt. The initial information about the violation of children's rights and the facts of violence came from the NGO La Strada-Ukraine, which prompted immediate coordination with law enforcement agencies in Odesa region immediately after the group's repatriation.

In order to immediately stop the unlawful actions and protect the interests of the children, the representative office coordinated with law enforcement and guardianship authorities. The Investigation Department of the Rozdilnyansky District Police Department of the Main Department of the National Police in Odesa Oblast initiated criminal proceedings under Article 166 of the Criminal Code of Ukraine. In addition, following the results of cooperation with the guardianship and custody authorities, a decision was promptly made to terminate the guardianship of all 14 children and appoint new legal representatives.

The children were interviewed in a child-friendly environment at the Child Protection Centre for Social and Psychological Support in Odesa using the Barnahus model. In the presence of psychologists, the children confirmed the facts of systematic physical and psychological violence.

Subsequently, the children were removed from the dangerous environment, provided with psychological rehabilitation and medical support, and the process of identifying new safe forms of placement began.

3. Protection of the rights of victims of armed aggression against Ukraine

Protection of the rights of persons affected by the armed aggression against Ukraine remains an important area of work at the regional level.

According to the Department of Social and Family Policy of Odesa Regional State Administration, **222,219** internally displaced persons have been registered in the region, including: **49,591** children, **10,591** people with disabilities and **33,474** elderly people.

According to the approved list, there are **36** temporary accommodation facilities (TACs) in the region with a total capacity of **1,325** beds. As of today, **490** internally displaced persons are accommodated in them, which indicates that there is a significant reserve of free places.

In addition, according to Resolution No. 930 "Some Issues of Functioning of Temporary Accommodation Sites for Internally Displaced Persons" of 1 September 2023 (as amended), **270** internally displaced persons live in **11** premises that are not included in the approved list of temporary accommodation sites.

In accordance with Resolution No. 495 of 29 April 2022 "Some measures for the formation of housing funds intended for temporary residence of internally displaced persons", **80** internally displaced persons were provided with **23** apartments and **2** dormitory rooms from the temporary housing fund.

During the reporting period, **129** monitoring visits were conducted. The main focus was on places of temporary residence, civil protection shelters, and the Crimea-Ukraine and Donbas-Ukraine educational centres.

Of the **72** recommendations provided, **17** were implemented; **42** were in the process of being implemented; **and 13** were not implemented.

The results of the monitoring of temporary accommodation facilities (TACs) in Odesa region revealed a number of systemic problems. In particular, the absence of a state mechanism for financing food creates a critical dependence of residents on occasional volunteer assistance, which threatens the food security of vulnerable categories of citizens. In addition, due to the absence of housing programmes, temporary accommodation centres are effectively turning into places of long-term residence, which can last for years, causing social isolation of IDPs and limiting their prospects for integration into local communities. There is also an unsatisfactory level of inclusiveness, as the fragmented arrangement of buildings does not ensure full barrier-free accessibility for people with reduced mobility. Particular attention needs to be paid to the issue of civil protection in the absence of own shelters, which, combined with the considerable distance to educational institutions, significantly limits the security, social guarantees and conditions for the full adaptation of citizens during martial law.

During the monitoring visit to Nastasiyivka preschool educational institution in Berezivskyi district, which functions as a place of temporary residence for IDPs, the needs of the residents for humanitarian aid, hard equipment and energy independence were identified.

In order to protect the rights of internally displaced persons, the office provided recommendations to the Odesa Regional Military Administration and local authorities to engage international and national humanitarian organisations to improve living conditions.

As a result of the response and established cooperation with partners, the institution was provided with a generator for the uninterrupted operation of the heating system, and residents received food packages, hygiene products and household chemicals. In addition, in response to the recommendations, the process of equipping the rooms with cabinets for storing personal belongings has begun.

4. Protection of the right to life and security under martial law

As of the end of 2025, the official map of protective structures in Odesa Oblast includes **2,914** simple and radiation-proof shelters and shelters. In 2025, civil protection facilities in Odesa Oblast are monitored on an ongoing basis. Based on the results of **60** monitoring visits conducted to assess the state of readiness and accessibility of protective facilities for the population, **245** recommendations were made to the public authorities.

The analysis of the monitoring results shows typical violations of the minimum requirements for the state of readiness and accessibility of protective structures for the population, which is largely due to the lack of adequate funding from the state, regional and local budgets.

The most problematic issues remain the lack of barrier-free access for people with limited mobility; inadequate technical and sanitary condition of shelters; the need for repairs and replacement of plumbing equipment; insufficient provision of shelters with technical equipment, water supply systems and furniture. Some violations relate to non-compliance with fire safety requirements in protective structures.

At the same time, there is a lack of proper interagency cooperation between state authorities and local governments, which complicates the process of creating and properly maintaining protective structures for the population, as well as impedes the full and timely implementation of recommendations made during monitoring visits.

During the monitoring visit to the shelter at 20-a Frantsuzkyi Boulevard, Odesa, a number of critical violations were identified. In particular, the lack of ventilation, the unsatisfactory condition of the bathrooms and limited access to the premises during air raid alarms.

In order to restore the residents' rights to safety, the office provided relevant recommendations to the Odesa City Council and the utility company.

Based on the results of the monitoring visit and further interaction with local authorities, control over bringing the protective structure into proper condition is ongoing. According to the official response of the Department of Municipal Economy, the storage facility No. 57034 at 20 Frantsuzsky Boulevard was included in the capital repair plan, which started in September 2025.

To date, as part of the City Target Programme for Civil Protection of the Population and Territories from Man-Made and Natural Emergencies and Fire Safety in Odesa for 2022-2026, work has been carried out to restore the toilets, upgrade the ventilation system, and take measures to eliminate the causes of high humidity and water accumulation. The makeshift structures were replaced with proper seating that meets the established standards. Also, responsible persons were on duty around the clock to ensure unimpeded access to the shelter during alarms.

Thus, as a result of the Commissioner's response, the identified violations were eliminated, and the right of citizens to life safety was restored.

The issue of ensuring proper arrangement of shelters continues to be under constant control of the Commissioner and the representative in the region.

Out of **245** recommendations provided: **71** were implemented; **153** are in the process of implementation; **21** were not implemented.

5. Protection of the right to access public information and the right to appeal

Ensuring the right of citizens to appeal and access to information is an inherent duty of state authorities, local self-government bodies, institutions and organisations.

During the reporting period, the Representative Office conducted **5** on-site inspections of information holders' websites.

As part of ensuring compliance with the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information", a number of violations were identified that are typical for information administrators:

- Lack of information on the institution's working hours;
- lack of possibility to submit an electronic appeal via the Internet, electronic communication means, or mailbox;
- no information on the hotline telephone number and working hours;
- there is no schedule for personal reception of citizens;
- the contact phone number for making an appointment for a personal reception is not correct;
- there is no information on the procedure and conditions of the competition for vacant positions;
- information on the organisational structure, mission, functions, powers, main tasks, areas of activity and financial resources, regulatory acts related to the activities of the local self-government body is not published;
- there is no information on the list and conditions for obtaining services provided by the local self-government body; there are no forms and samples of documents, rules for their completion, location of places where the necessary forms and blanks are provided;
- there is no procedure for drawing up and submitting a request for information, no procedure for appealing against decisions of the information manager, actions or inaction;
- the list of datasets published in the form of open data on the Unified State Open Data Web Portal is not published;
- there is no information on the mechanism or procedure by which the public can represent its interests or otherwise influence the exercise of powers of the information manager;
- Schedules and agendas of open meetings, general rules of work of the institution, internal labour regulations are not published;
- reports on consideration of requests for access to public information are not published;
- there is no information on the activities of public authorities, namely on heads of structural units, their locations, postal addresses, telephone numbers, official website and e-mail addresses.

As a result, **25** recommendations were made, of which **10** were implemented, **6** were in the process of implementation, and **9** were not implemented.

During an on-site reception of citizens by the Ombudsman's representative in the Shyriayivska territorial community, it was found that the official community website was disconnected from the server, and the telephone numbers posted on the web resource were not functioning. These circumstances were brought to the attention of the community leadership during an awareness-raising event aimed at complying with the requirements of the legislation on access to information and personal data protection.

Based on the results of the meeting and the explanations provided, the official website of the Shyriayiv territorial community was restored and launched in an updated mode within two days. Thus, the right of community residents to access public information was restored.

6. Protection of human rights in places of detention

In 2025, the Ombudsperson's Office carried out **27** monitoring visits as part of the National Preventive Mechanism. The inspections covered a wide range of institutions: from judicial and law enforcement agencies to social institutions and orphanages. The monitoring visits resulted in reports with recommendations to address the identified human rights violations.

Systemic violations of the right to security and accessibility were identified in **8** out of **9** courts inspected. As a result of the response, fire extinguishing systems were upgraded, fire extinguishers were inspected, and fire safety controls were strengthened. In addition, the premises have been partially adapted to meet the needs of people with disabilities and people with reduced mobility. The police stations have taken steps to ensure that citizens' complaints are properly recorded.

During visits to a medical institution and **7** inpatient care units, inadequate conditions for the wards were recorded. The violations were partially eliminated: outdated furniture was replaced, and the institutions were provided with medicines and rehabilitation equipment for people with disabilities.

A monitoring visit to the Odesa Regional Mental Health Medical Centre of the Odesa Regional Council revealed violations of the rights of the wards in the institution.

In particular, in the geriatric ward and the ward for military personnel, non-compliance with the requirements for accessibility for persons with disabilities and persons unable to move independently was found. Problems were also identified with the provision of adequate furniture, privacy, and the unsatisfactory condition of certain premises that had been renovated or required renovation work.

Based on the findings of the violations, the Ombudsman's submission was sent to the Odesa Regional Military Administration. In accordance with the recommendations provided, the Odesa Regional Military Administration took appropriate measures, in particular: accessibility for patients with limited mobility was provided, wards were partially renovated, and furniture was purchased.

During the visit to the inpatient care unit for permanent and temporary residence of the municipal institution of the Suvorov (Katlabuga) village council, the NPM team found that 23 residents were in extremely difficult conditions, some of whom did not have identity documents.

Among the main violations were the lack of protective structures, furniture, personal hygiene products, accessibility for people with limited mobility, proper medical care, rehabilitation equipment, adequate nutrition, non-compliance with sanitary standards, and the presence of people without identity documents. The wards are deprived of the opportunity to receive adequate nutrition and proper medical care.

After the visit, letters were sent to the Odesa Regional Military Administration, which were reviewed and urgent response measures were taken, namely: a separate room for storing medicines with refrigeration equipment was set up; four meals a day were provided to the wards; the food unit was equipped with the necessary equipment and a contract was concluded for food certification in accordance with current standards. In order to carry out repair work in the institution, the wards were temporarily relocated to the renovated premises. The wards were also provided with household items, hard and soft equipment and rehabilitation equipment.

In order to obtain documents on the identification of two wards, the institution sent relevant requests to the state civil registration authorities. Upon reviewing the requests, it was found that there was no information about the persons concerned, and explanations were provided on the procedure for processing documents in the absence of personal data.

Thus, the cases of obtaining documents on the identification of two wards are pending in the Izmail City District Court of Odesa Oblast.

During 5 monitoring visits to penitentiary institutions in Odesa region and 7 personal receptions of convicts and detainees, facts of violations of their fundamental rights were revealed. In particular, violations of the right to adequate medical care, non-compliance with procedural rights, inadequate conditions of detention, and the failure to provide free legal aid were found.

Based on the results of processing 7 complaints, the office took response measures, which led to the following results

- the right to medical care was restored: 1 person was provided with the necessary treatment and medical support within the institution;
- procedural rights were ensured: parliamentary control over participation in court hearings was established for 2 persons, in particular through the establishment of video conferencing and timely transfer
- the right of 3 people to free legal aid was renewed.

In 2025, the regional office carried out monitoring visits to two orphanages in the region to check the living conditions and safety of the children.

The key problem identified during the monitoring was the lack of proper shelters (civil protection structures). In the context of martial law and regular shelling of the region, this poses a critical threat to children's right to life and personal safety.

7. Protecting the right to a fair trial

Access to justice is a fundamental guarantee of human rights protection, enshrined in Article 55 of the Constitution of Ukraine and Article 6 of the Convention for the Protection of Human Rights and Fundamental Freedoms. In 2025, one of the priorities of the Ombudsman's Office in Odesa region was to exercise parliamentary control over the observance of procedural rights of participants in court proceedings, in particular through the prism of compliance of the conditions of detention of defendants with the standards of justice.

In the reporting period, the monitoring was carried out through direct observation of the court proceedings. The work covered **16** court proceedings, including: **12** - criminal cases; **4** - civil cases. The systematic presence of monitors is aimed at recording both the procedural aspects of human rights observance and the conditions of the participants in the process.

Based on the appeal of citizen K., the Ombudsman's Office in Odesa region monitored the observance of procedural rights during the trial of criminal proceedings.

During the monitoring of the court session, an employee of the Ombudsman's Office recorded violations of the rights of defendants (prisoners) in the courtroom for consideration of criminal cases, in particular, the presence of five people (four women and one man) in a closed glass box.

According to the results of the monitoring of this court session, this fact was identified as a violation of the procedural rights of defendants (prisoners). During subsequent monitoring visits to the court session, it was established that the procedural rights of the defendants (prisoners) were restored in accordance with the established norms.

RECOMMENDATIONS:

Odesa Regional State Administration, Regional Military Administration:

to provide targeted funding for the overhaul of protective structures, with special attention to ventilation systems, plumbing equipment and barrier-free access for people with limited mobility;

eliminate violations in the organisation of catering in educational institutions, including the development of a dietary menu for children with special needs;

to ensure full compliance with the requirements of the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information" regarding the publication of information on official websites;

ensure compliance with the minimum requirements at the ICC in accordance with the provisions of the CMU Resolution "Some issues of functioning of places of temporary residence of internally displaced persons" of 1 September 2023, No. 930;

ensure that the personal files of orphans and children deprived of parental care are filled in in accordance with the Procedure for the implementation of activities related to the protection of children's rights by guardianship and custody authorities, approved by CMU Resolution No. 866 of 24.09.2008.

Local self-government bodies:

publish on the websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals";

bring the number of employees of the services for children in the territorial communities of Odesa Oblast in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children";

to ensure personal receptions of citizens, as well as participation of citizens in the consideration of appeals, taking into account the conditions of martial law (personal reception by video conference in safe spaces);

to provide targeted funding for the overhaul of protective structures, paying special attention to ventilation systems, plumbing equipment and barrier-free access for people with limited mobility.

Odesa Regional Territorial Centre for Recruitment and Social Support:

to conduct additional briefings with personnel on the inadmissibility of mobilising persons with a deferment or disability, and to ensure thorough verification of documents at the stage of conscription;

to establish a transparent algorithm of interaction with the families of prisoners of war and missing persons, ensuring timely provision of information and certificates on the progress of the search;

to ensure unimpeded access of lawyers and representatives of the free legal aid system to the premises of the TCC and JV;

to ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the time limits established by law;

to ensure proper organisation of office work and correspondence accounting.

11.15. Poltava Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **5,796** appeals from Poltava region, containing **6,869** reports of human and civil rights violations. The most frequently mentioned human rights violations in the reports were: civil rights - **4,454** reports, social rights - **509** reports, economic rights - **375** reports, children's rights - **434** reports, and personal rights - **119** reports.

The number	2022	2023	2024	2025
Citizens' appeals	1 237	3 400	4 818	5 796
Reports of rights violations	1 598	4 132	5 355	6 869

The location of Poltava region in the central part of Ukraine determines the specific challenges associated with the consequences of the armed aggression of the Russian Federation. Despite the fact that the region is not classified as an area of active hostilities, in 2025 it repeatedly suffered missile and drone attacks, mainly targeting energy and industrial infrastructure. These attacks caused damage to buildings and structures, disruptions in the functioning of the energy system, and created additional risks to public safety.

In addition to the direct consequences of the shelling, the region is experiencing a significant socio-economic burden associated with the reception and accommodation of internally displaced persons from the frontline and temporarily occupied territories, as well as the need to maintain critical infrastructure under the constant threat of air attacks. Damage to energy facilities and residential buildings as a result of attacks by unmanned aerial vehicles and missiles creates additional risks to the provision of electricity and other essential services to the population.

In such circumstances, ensuring an adequate level of respect for human rights and freedoms in the region requires coordinated, comprehensive and human rights-oriented measures from state authorities, local governments and civil society institutions aimed at increasing community resilience, protecting civilians and minimising the consequences of armed aggression.

Monitoring visits/on-site inspections

One of the priority areas of the regional office's work is monitoring the observance of citizens' rights by state authorities, local self-government bodies, institutions, organisations, etc. In 2025, the team of the Ombudsman's Office in Poltava region conducted **165** monitoring visits and inspections in various areas of ensuring observance of human and civil rights and freedoms.

In 2025, **31** monitoring visits were conducted in the area of child protection. The inspections were aimed at observing the property and housing rights of children in difficult life circumstances, as well as ensuring the right to family upbringing. Particular attention was paid to the observance of children's rights to a safe educational environment in the activities of educational institutions in Poltava region.

In order to monitor the observance of the rights of citizens to accessible and free medical care, including military personnel, **two** visits were made to a medical facility.

An important area of work at the regional level in Poltava region is the protection of the rights of persons affected by the armed aggression against Ukraine. In

2025, the team of the Mission conducted **21** monitoring visits to protect the rights of persons affected by the armed aggression against Ukraine, in particular in places of temporary residence of IDPs.

The educational centres "Crimea-Ukraine" and "Donbas-Ukraine" operate in the region on the basis of higher and vocational higher education institutions, which provide assistance to applicants from the temporarily occupied territories. In 2025, monitoring visits were carried out to **8** such centres.

To ensure the right of citizens to safety and access to protective structures under martial law, **41** monitoring visits were carried out to check the condition of shelters, their accessibility to the public and compliance with safety requirements.

In the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention, **25** monitoring visits were carried out.

In the field of information rights protection, the team of the Representative Office carried out **18** on-site inspections on observance of human and civil rights to appeals and information, as well as **4** inspections of compliance with the legislation on personal data protection.

In addition, **15** monitoring observations of court hearings were carried out on convicts' applications for conditional release, commutation of unspent sentences and observance of procedural rights.

Educational activities

In order to raise public awareness of the protection of human and civil rights and freedoms, **117** legal education events were organised and held in the region, involving **2,193** participants.

In order to raise awareness of the protection of human and civil rights and freedoms, **63** legal education events were launched and conducted for the student youth of Poltava region . **21** educational events were held for internally displaced persons in places of temporary residence. A **total** of **33** legal education events were held for law enforcement officers, state and local government officials.

In addition, in 2025, a pilot project "School Ombudsman" was launched in Poltava region. Extensive awareness-raising and training was conducted for schoolchildren in the communities of Poltava Oblast, **110** School Ombudsmen were elected and presented with their certificates.

The main issues addressed by the Ombudsman's office were:

- protection of children's rights;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;

- protection of the rights to life and security;
- protection of citizens' information rights.

1. Protection of children's rights

In 2025, the regional office of the Ombudsperson in Poltava region conducted **31** on-site monitoring visits to children's services, general education institutions, educational and rehabilitation centres, special schools for orphans and children deprived of parental care, centres for social and psychological rehabilitation of children, and children's wards of hospitals to monitor the observance of children's rights, during which a number of violations were identified.

Children's services do not take measures to ensure the housing/property rights of orphans and children deprived of parental care; the right to family-based care; the proper maintenance and implementation of individual social protection plans for children in difficult life circumstances, children without parental care, orphans, and children deprived of parental care; and the number of staff in services does not correspond to the number of children.

In September 2025, a monitoring visit was carried out to the Children's Service of the Executive Committee of the Kobelia City Council to monitor the observance of the rights and freedoms of orphans, children deprived of parental care and children in difficult life circumstances, monitor the activities of guardianship and custody authorities to ensure the property and housing rights of children, and monitor the observance of the rights of children in the territorial community to be brought up in a family or in conditions close to family.

During the monitoring, it was found that 3 children were in a private orphanage in Kirovohrad region. After reviewing the personal files of these children, it was found that the children were enrolled in a private orphanage in 2019 at the request of their father, but on the day of the monitoring visit, the father and mother of these children were deprived of parental rights by the decision of the Kobeliaky District Court of Poltava Oblast, and the guardianship of the children was entrusted to the guardianship and custody authority of the Kobeliaky City Council.

However, despite the fact that the children were registered for adoption and had the right to be brought up in a family environment or in forms as close to family as possible, they continued to be kept in a private orphanage.

In order to respond promptly and ensure the rights of children to be brought up in a family environment, the representative of the Ombudsperson's Office in Poltava region prepared a report and sent it together with response letters to the Poltava Regional Military Administration and Kobelyaky City Council to take urgent measures and ensure the right of children to protection and care by the state in accordance with Article 52 of the Constitution of Ukraine.

As a result of the measures taken, the Children's Service of the Poltava Military Administration and the Children's Service of the Executive Committee of the Kobelia City Council returned the children to the territory of Poltava region and placed them in a family-type orphanage.

General secondary education institutions in Poltava region do not provide accessibility for persons with disabilities, do not comply with fire safety standards, the actual number of students does not meet the approved licensed number, children are examined and treated without the written informed consent of their parents, and such examination and prescription of medications is carried out by a nurse, and there is no proper recording of cases and reports of violence.

In October 2025, during a monitoring visit to Lyceum No. 2 "Podilskyi" of the Poltava City Council, violations of children's rights to a safe educational environment and an adequate standard of living were identified, and children were studying in conditions that threatened their lives and health.

It was established that the educational institution did not have handrails on the porch of the institution in accordance with the requirements of DBN B.2.2-3:2018 "Educational Institutions"; no measures have been taken to equip the shelter with ramps, handrails and wooden or metal ladders to enable the free use of protective structures by persons with disabilities and other persons with limited mobility; there is no toilet paper in the toilets of the institution; no log of detection (appeal) of domestic and gender-based violence is kept; the proper functioning of the medical office is not ensured.

In order to respond promptly and ensure children's right to education, the representative of the Ombudsperson in Poltava region sent a response letter to the Poltava City Council and Lyceum №2 "Podilskyi".

As a result of the measures taken, the Poltava City Council and the administration of Lyceum No. 2 installed handrails in the shelter, provided toilets with all the necessary facilities; started keeping a register of detection (appeals) of domestic and gender-based violence, revised the schedule at the main place of work of the paediatrician, ensured the presence of a paediatrician at the school during "peak hours", and obtained consent from parents for the examination and treatment of children.

Protecting children from violence is the responsibility of the state, society and every citizen. The priority of the Ombudsperson's Office in Poltava region is to take appropriate response measures aimed at protecting the rights and interests of children, including those who have suffered from sexual violence. In 2025, special attention was paid to observance of children's rights to protection from all forms of violence in general

secondary education institutions, in particular, to prevent bullying. During the visits, systemic violations by the administrations of general secondary education institutions were identified: lack of approved Regulations on Preventing and Combating Violence and Cruelty against Children; lack of a security log (Internal Incident Log); staff job descriptions do not include a clause prohibiting torture, cruel, inhuman or degrading treatment or punishment; lack of logs of detection (reporting) of domestic violence and

In December 2025, information was posted on social media about alleged bullying by a 7th grade class teacher at a general secondary education institution in Poltava region.

The Regional Office in Poltava region visited the school, during which it was established that the administration of the school did not comply with the procedure for responding to cases of bullying (harassment), approved by the order of the Ministry of Education and Science of Ukraine dated 28.12.2019 No. 1646, which was manifested in improper registration and recording of initial reports of bullying, as well as violations of the procedure for further consideration and assessment of the identified case. For example, the administration of the institution failed to inform the territorial unit of the National Police of Ukraine within 1 day of receiving a report of a case of bullying (harassment).

In order to respond promptly and ensure the right of children to protection from all forms of violence, the representative of the Ombudsperson in Poltava region sent a response letter to the city council and the educational institution.

As a result of the response measures taken by the city council and the educational institution, at a meeting of the pedagogical council, the Procedure for handling cases of bullying (harassment), approved by the Order of the Ministry of Education and Science of Ukraine No. 1646 of 28.12.2019, was developed and communicated to the teaching staff, and the job descriptions of pedagogical staff were amended to protect children from torture, cruel, inhuman or degrading treatment or punishment.

The regional office of the Ombudsperson in Poltava region monitors the implementation of the recommendations and takes measures to restore violated children's rights. Out of **256** recommendations: **155** were implemented; **53** are in the process of being implemented; **48** were not implemented.

2. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances

Since 1 May 2025, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War has been operating in Poltava and Sumy. The group includes representatives of the National Police of Ukraine, the National Guard of Ukraine, the Security Service of Ukraine, the Poltava Regional Military Administration, and the territorial centre for recruitment and social support.

Systematic meetings with families of prisoners of war and persons who went missing under special circumstances were arranged. **44** meetings were held, attended by **2,897** people.

The main issues discussed at the meetings were the timing and mechanisms of exchanges, the algorithm of actions in case of missing persons, communication with the command and investigative bodies, and the receipt of payments by the families of prisoners of war and persons missing in special circumstances.

Regular receptions of citizens, provision of legal advice and explanation of procedures aimed at supporting families and supporting their appeals were ensured. Assistance was provided in creating **58** personal accounts on the website of the Coordination Headquarters for the Treatment of Prisoners of War.

Another key challenge for 2025 is the increase in the number of appeals regarding human rights violations during mobilisation activities - **56** appeals. For each violation, including those covered by the media, the regional office took response measures: letters were sent to the TCC and JCC, the military law enforcement service of the National Police. **28** working meetings were held with the management of the TCC and JV, as well as the law enforcement sector of Poltava Oblast.

In 2025, in order to ensure the observance of the rights of clergy during mobilisation activities during martial law, the Commissioner's office initiated and held interagency meetings on the mobilisation of religious organisations with the participation of leaders of religious denominations in Poltava region, representatives of territorial recruitment and social support centres, and the Main Department of the National Police in Poltava region. As a result of the meetings, agreements were reached to coordinate interaction between religious organisations and authorised bodies during mobilisation activities.

In order to ensure the implementation of the state veterans' policy at the regional level, in particular to support and protect the rights of family members of missing Ukrainian defenders, the NGO "Kolishchata" in partnership with the NGO "Families of Prisoners and Missing Persons of Poltava Region" implemented a project: "Ensuring the rights of family members of missing defenders from Poltava region".

As part of the implementation of veterans' policy measures and to increase the professional capacity of veterans' support specialists in territorial communities to work with the families of missing defenders, three one-day training courses on "Working with Families of Missing Defenders" were held. The training was attended by representatives of **47** territorial communities in the region that provide social, counselling and other types of support to the families of captured and missing defenders.

In March 2025, a monitoring visit to the Municipal Enterprise "3rd City Clinical Hospital of Poltava City Council" was carried out to ensure that the rights of citizens to accessible and free medical care, including military personnel, are respected.

The monitoring visit revealed non-compliance with building standards for the accessibility of sanitary and hygienic facilities, the lack of a shelter in one of the hospital's premises, the vacancy of 52 full-time medical staff positions, and the lack

of proper information for military personnel about dental prosthetics and dental treatment services at the facility.

Based on the monitoring visit, a report with recommendations was drawn up and sent to the Poltava City Council and the Municipal Enterprise "3rd City Clinical Hospital of the Poltava City Council" to eliminate the violations.

The violations identified in the report were eliminated. In particular, sanitary and hygienic rooms (showers) in inpatient wards were equipped to meet the needs of people with limited mobility, a shelter was set up in one of the hospital's premises, vacant positions of medical staff were filled, and military personnel were informed about dental prosthetics and dental treatment services at the institution by posting relevant information on the institution's stands.

3. Protection of the rights of victims of armed aggression against Ukraine

As a result of Russia's armed aggression against Ukraine, a significant number of people were forced to flee their homes and seek safe haven in other regions of our country. Thus, as of the end of December 2025, according to the Poltava Regional Military Administration, the number of IDPs in the region was **184,633**.

The key issues faced by IDPs in 2025 and addressed to the Ombudsman were the provision of adequate living conditions, the high cost of renting housing in the region, as well as the insufficient formation of a housing stock intended for temporary residence of IDPs, or the existence of such housing stocks only formally.

To monitor the observance of the rights of IDPs to proper living conditions in temporary accommodation, the Regional Office of the Ombudsman in Poltava region conducted **21** monitoring visits in 2025 and checked **21** ICCs for compliance with the standards set out in the Procedure for the functioning of temporary accommodation for internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of temporary accommodation for internally displaced persons" dated 01.09.2023.

During the monitoring visits to the TACs, the following key violations were identified: lack of sufficient household appliances and kitchen utensils, violation of sanitary and hygienic standards, lack of facilities for people with limited mobility.

According to the results of the monitoring visit on 16.07.2025 to the MCC on the basis of the "Novoselivka Branch of the Preschool Education Unit of the Zinkivsky Support Lyceum No. 1 of the Zinkivsky City Council", the monitoring group found a number of violations. In particular, the residents of the MCC complained about the lack of household appliances, the unsatisfactory condition of beds and soft equipment in the common areas.

Based on the results of the monitoring visit, a report with recommendations was prepared and sent to the Poltava Regional Military Administration for response measures.

The Poltava Regional Military Administration and local authorities took measures to address the identified violations. In particular, the ICC was provided with additional furniture and household appliances in accordance with the number of people living in the ICC.

Based on the results of the monitoring visits in 2025, **35** recommendations were made to the Poltava Regional Military Administration to improve the living conditions in the inspected TACs. Of the **35** recommendations provided, **13** have been implemented, **17** are in the process of being implemented and **5** have not been implemented.

4. Protection of rights to life and security

During the martial law, ensuring the right of citizens to safety and access to protective structures is of particular importance. During 2025, the Ombudsman's Office in Poltava region conducted **41** monitoring visits to the facilities of the protective structures fund located in Poltava city and territorial communities of Poltava region.

The monitoring activities were carried out with the aim of a comprehensive assessment of the state of functioning of protective structures, identification of problematic aspects and potential risks, as well as improvement of mechanisms for ensuring the safety of life and health of the population under the legal regime of martial law.

The most commonly identified violations include: lack of barrier-free access to shelters; lack of a first aid kit with a basic set of medicines and bandages; lack of a chanterelle tool.

Based on the results of the monitoring, reports were prepared with relevant recommendations to improve the level of compliance with the requirements for the maintenance and operation of civil protection structures and their ability to meet the basic needs of the population in an emergency, in particular, the need to ensure barrier-free access to shelters for people with limited mobility; provision of first aid kits, emergency tools, and the necessary supply of food, drinking and industrial water.

The monitoring visits to **41** objects of the fund of protective structures revealed that **9** shelters are properly equipped and accessible to the civilian population. A total of **91** recommendations were made for other shelters: **61** were implemented; **14** were in the process of being implemented; and **16** were not implemented.

In order to exercise parliamentary control, a monitoring visit was conducted in November 2025 to the civilian shelter facility in the basement of the municipal non-profit enterprise "Hadiach City Central Hospital" of the Hadiach City Council.

During the monitoring visit, it was found that the shelter lacks first aid equipment, a chance tool, a sufficient number of sitting and lying places, the

necessary food supply, and there is a need to fill drinking water tanks and provide remote sewage tanks.

The above indicates that the balance holder violated the requirements of Order of the Ministry of Internal Affairs of Ukraine dated 09.07.2018 No. 579 "On Approval of Requirements for Maintenance, Arrangement and Operation of the Facilities of the Civil Protection Facilities Fund, Accounting of the Civil Protection Facilities Fund, Determination of Criteria for Impossibility of Further Maintenance and Operation of Civil Protection Facilities, and Preparation of Documents Confirming Such Impossibility".

As a result of the report with recommendations sent to the Hadiach City Council, the identified deficiencies were eliminated and the shelter was provided with first aid equipment, a chance tool, a sufficient number of sitting and lying places, the necessary food supply, drinking water tanks, and remote sewage tanks.

Protection of citizens' information rights

In 2025, the Mission's team conducted **17** on-site inspections of the websites of state authorities and territorial communities to ensure compliance with the right of citizens to apply and access information. The following violations have become systemic: partial or complete absence of publicly available information on websites regarding decisions made, regulations, lack of reporting on satisfaction of requests for public information on websites, absence of a form for submitting an electronic request, lack of information on work rules, internal labour regulations and work regulations, etc.

An on-site inspection of the official website of the Myrhorod City Council in June 2025 revealed violations of the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information".

In particular, the website does not have a form for submitting an electronic appeal, does not contain the information required by Article 15 of the Law of Ukraine "On Access to Public Information", does not publish public information in the form of open data on the Unified State Open Data Web Portal, and does not ensure constant updating of information on the unified web portal for the use of public funds.

Based on the results of the audit, a report with recommendations was drawn up and sent to the head of the city council to eliminate the violations.

To implement the recommendations, Myrhorod City Council eliminated the identified shortcomings and increased the level of openness and accessibility of information for community residents: updated key information sections of the website; posted a form for submitting electronic appeals on the main page of the official website; and posted internal regulations for the provision of administrative services (information cards) available on the website of the Administrative Service Centre. The information is also available on the official website of Myrhorod City

Council in the section 'Administrative Services'. A section on 'Feedback' has been created, which contains information on the procedure for appealing against decisions, actions or inaction of state bodies. Information on the general rules of the institution's work and internal labour regulations is available on the official website of Myrhorod city council in the section on 'Labour Regulations'. Information on the record keeping system and types of information kept by the administrator is available in the section 'Public Information'.

Of the **85** recommendations provided, **75** were implemented; **12** were in the process of implementation; **and 3** were not implemented.

In order to verify the requirements of the legislation in the field of personal data protection, in particular the Law of Ukraine "On Personal Data Protection", Order of the Ukrainian Parliament Commissioner for Human Rights No. 1/02-14 dated 08.01.2014 "On Approval of Documents in the Field of Personal Data Protection", **4** inspections were conducted in executive authorities and local self-government bodies and it was found that personal data processing and protection is carried out in violation of the requirements of the legislation on personal data protection: there is no administrative document that defines the general terms and conditions of personal data protection.

Based on the results of the scheduled inspections, the Orders to eliminate violations of the legislation on personal data protection revealed during the inspection were drawn up and sent to the heads of the institutions. It should be noted that the inspected entities eliminated 100% of the violations of the requirements of personal data protection legislation and implemented the recommendations in full.

In December 2025, an audit of compliance with the personal data protection legislation of the Poltava City Council was conducted.

The audit revealed violations of the Law of Ukraine "On Personal Data Protection" and the Order of the Ukrainian Parliament Commissioner for Human Rights No. 1/02-14 dated 08 January 2014 "On Approval of Documents in the Field of Personal Data Protection": there is no administrative document that defines the general requirements for the processing and protection of personal data of personal data subjects, respectively, the purpose and grounds for processing personal data, the categories of subjects and the composition of personal data to be processed are not defined; the responsible person is not identified,

An on-site inspection report on compliance with personal data protection legislation and an order to eliminate violations of personal data protection legislation were drawn up and sent to the Poltava City Council.

Pursuant to the Act and the Order, Poltava City Council approved the Procedure for Processing and Protection of Personal Data Owned by Poltava City Council; the List of Personal Data Owned by Poltava City Council and Responsible Persons Ensuring Protection of Personal Data During Processing; appointed a

responsible person to organise work related to protection of personal data during processing; and approved the procedure for destruction/deletion of personal data whose storage period has expired in Poltava City Council.

RECOMMENDATIONS:

To Poltava Regional State Administration, Regional Military Administration:

Ensure periodic (at least once a year) training of employees of educational institutions on how to act in cases of violence and cruelty against children in accordance with the requirements of the Procedure for responding to cases of violence and cruelty against children, approved by the Cabinet of Ministers of Ukraine on 19.11.2025 No. 1513;

ensure that educational institutions comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition;

together with local authorities, international and national non-governmental organisations (upon agreement), within their powers, ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, in particular, in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023, with the possibility of further confirmation of compliance with the established standards.

Local self-government bodies:

bring the number of employees of children's services in line with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Resolution of the Cabinet of Ministers of Ukraine No. 905 of 08.10.2008 "On Approval of the Procedure for the Protection of Personal Data";

to ensure control over the activities of children's services in assessing the needs of children in difficult life circumstances, children without parental care, orphans, and children deprived of parental care;

to ensure proper response to cases of violence and cruelty against children in educational institutions in accordance with the Procedure for responding to cases of violence and cruelty against children, approved by the Cabinet of Ministers of Ukraine

on 19.11.2025 No. 1513;

to equip protective structures in pre-school and secondary education institutions to ensure the safety of participants in the educational process during training;

to bring protective structures into a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018.

publish on the websites information on the procedure for exercising the right to appeal in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals";

to ensure that information managers publish on their websites the information required by the Law of Ukraine "On Access to Public Information".

Services for Children of local self-government bodies of Poltava region:

Ensure proper documentation and formation of personal files of children;

Ensure effective cooperation with social service centres/social service centres and interagency cooperation with actors involved in prevention and combating domestic violence in order to prevent violations of the rights of children and their families to receive adequate social protection, ensure their social support and basic social services.

Poltava Regional Centre for Recruitment and Social Support:

to ensure control over the implementation of notification and conscription measures by the united district/city territorial centres for recruitment and social support, in order to respect the rights of citizens and prevent a formal approach to mobilisation measures.

11.16. Rivne Region

During the reporting period, the Ukrainian Parliament Commissioner for Human Rights received **4,009** appeals from Rivne region, containing **4,909** reports of human and civil rights violations.

The most frequently reported human rights violations included: civil rights - **3,714**, social rights - **309**, economic rights - **159**, personal rights - **113**, freedom from discrimination - **113**, and children's rights - **76**.

The number	20	202	2024	202
	22	3		5

Citizens' appeals	67 3	2 193	3 220	4 009
Reports of rights violations	85 4	2 501	3 501	4 909

The Rivne region is a border region bordering the Republic of Belarus. This fact, as well as the presence of critical infrastructure facilities of national importance in the region, including the Rivne Nuclear Power Plant, result in additional security challenges under martial law.

Despite the absence of active hostilities in the region, the consequences of the armed aggression of the Russian Federation against Ukraine have a significant impact on the enjoyment of human rights and access to basic services. The issues of ensuring the rights of servicemen, war veterans and their families, as well as the families of persons who went missing under special circumstances, remain relevant.

In addition, the region has become one of the regions that has received, and still continues to receive, a significant number of internally displaced persons, which has put additional strain on the social protection, education, healthcare and housing systems. Particular attention should be paid to ensuring access to administrative, social and legal services for vulnerable groups, including children, persons with disabilities and the elderly.

In such circumstances, an important task for state authorities, local governments and civil society institutions is to ensure proper protection of human rights, increase community resilience and implement comprehensive solutions to support the population under martial law.

Monitoring visits/on-site inspections

In 2025, the Mission's team carried out **128** monitoring visits and **46 on-site** inspections in various areas of ensuring the observance of human and civil rights and freedoms.

Of these:

21 - within the framework of the national preventive mechanism;

17 - observance of children's rights;

36 - observance of the rights of internally displaced persons (*including: 29 - the rights of internally displaced persons; 7 - the right of access to educational services for persons residing in the temporarily occupied territories*);

42 - observance of information rights;

50 - monitoring of the objects of the fund of protective structures for the possibility of using them for sheltering the population;

4 - observance of the right to a fair trial and procedural rights;

4 - personal data protection checks.

Educational activities

In order to raise awareness of the protection of human and civil rights and freedoms, the Ombudsman's Office held **166** educational and informational events during the reporting period, which covered various target audiences.

These events were held for employees of local self-government bodies, state authorities, law enforcement and judicial bodies, residents of territorial communities, internally displaced persons, children and other persons.

In 2025, the region launched the School Ombudsman pilot project, which aims to introduce mechanisms for early response to child rights violations and create a trusting and safe school environment.

The project covered **85** educational institutions, where the first school ombudsmen - high school students trained to mediate within school self-government - started working on 20 November. Despite the short period of implementation, **16** appeals were recorded in the first month. Students mostly choose anonymous forms of appeal: through trust boxes and QR codes.

The main issues addressed by the Ombudsman's office were:

- protection of the rights of servicemen, persons missing under special circumstances, prisoners of war and illegally detained civilians;
- protection of children's rights;
- protection of the rights of citizens affected by the armed aggression against Ukraine;
- protection of citizens' rights to life and security;
- protection of the rights of persons held in places of detention;
- protection of information rights.

1. Protection of the rights of servicemen, persons missing under special circumstances, prisoners of war and illegally detained civilians

In 2025, the team of the Ombudsperson's Office systematically responded to appeals from servicemen, veterans and their families. **940** concerned observance of rights during conscription and mobilisation, performance of and discharge from military and alternative service, healthcare and medical care, financial, material and social security, as well as establishing the location of prisoners of war in the territory of the Russian Federation. **190** appeals were received from veterans and their relatives regarding the acquisition of relevant statuses and the exercise of the right to statutory payments. The applicants were provided with detailed explanations on how to proceed or practical assistance in restoring their violated rights.

In September 2025, the Ombudsman received an appeal from citizen D. The applicant reported a violation of his right to proper and timely consideration of his application for a postponement of military service during mobilisation. According to him, back in June, he personally applied to the fifth department of the Rivne Regional Military and Civilian Personnel Committee, but the application was left without consideration.

Similarly, an appeal submitted in July through the Government Contact Centre to the Ministry of Defence of Ukraine proved to be similarly ineffective.

Citizen D. had previously exercised the right to a deferment, and in March 2023 was discharged from military service due to raising a child with a disability under the age of 18. The Ombudsman initiated proceedings over the incident and sent relevant inquiries to the Ministry of Defence of Ukraine and the Rivne Regional Territorial Centre for Recruitment and Social Support. Based on the results of the response measures taken, the above issue was considered in accordance with the procedure established by law, and the applicant was granted a deferral from military service during mobilisation.

On a regular basis, the Mission is engaged in work with the families of Defenders of Ukraine who are in captivity or are considered missing under special circumstances.

Thus, since 01 May 2025, the Ombudsman's representative, as well as the staff of the Ombudsman's Office in Rivne region, have been members of the Regional Working Group of the Coordination Headquarters on the treatment of prisoners of war in Rivne region.

Within the framework of its activities, systematic communication and legal support for the families of prisoners of war and missing persons was provided. In particular

- 37 meetings were held with over 1,540 family members of prisoners of war and missing military personnel;

- 24 receptions of citizens were held at the Centre for Tracing Missing Persons in Special Circumstances at the Main Department of the National Police in Rivne region, during which 363 people received individual legal advice.

Special attention should be paid to cases of inadequate response of district and regional MCCs and JVs to appeals from persons liable for military service, which in some cases complicated the exercise of their right to pensions.

In January 2025, a citizen P., a war veteran, lieutenant colonel of the reserve of the Armed Forces of Ukraine, who had served in the territorial defence forces "West" during February 2022 - April 2024, applied to the Ombudsman.

In order to apply for a long service pension, he needed a duly certified extract from the order of appointment to the relevant position. During the year, the applicant repeatedly appealed to both the Regional Directorate of the Territorial Defence Forces "West" and the State Archives in Rivne region, which mutually transferred responsibility for the storage of documents. The Ombudsman's representative sent letters to the above-mentioned organisations with relevant explanations.

Only after the Commissioner's response was the required document provided, which allowed the applicant to confirm his insurance period and continue the pension application procedure.

An important area of activity is monitoring the observance of the rights of persons liable for military service during mobilisation. During the year, appeals were received from Rivne region regarding possible illegal actions of TCC and JV employees during the verification of military registration documents, as well as the denial of access to TCC

and JV premises for lawyers to ensure the right to defence. Such cases are also recorded in media monitoring. In particular, in 2025, 16 videos were found containing conflict situations involving TCC and JV employees. Based on the results of the Commissioner's response, in 7 cases, the relevant information was entered into the URPTI, and pre-trial investigations are ongoing. Also, in one of them, the head of the TCC was suspended from performing his duties.

The media reported that employees of the TCC and the JV in Rivne region used coercive measures during mobilisation activities, which were later classified as intentional light bodily harm. In order to clarify the circumstances and conduct an independent official inspection of the actions of the officials of the relevant TCC and JV, the representative of the Commissioner in Rivne region sent a response letter to the Main Department of the National Police in Rivne region and the Rivne Zonal Department of the Military Law Enforcement Service.

As a result of the response, proceedings were opened and the jurisdiction of further pre-trial investigation was determined for the Investigation Sector of the Rivne Regional Police Department. As of today, the pre-trial investigation into the above facts is ongoing.

2. Protection of children's rights

In total, in 2025, the Mission carried out **18** monitoring visits, which resulted in **114** recommendations, of which: **23** have been fully implemented; **91** are in the process of implementation.

The monitoring visits to general secondary education institutions revealed a number of systemic violations of children's rights to safe and accessible learning conditions, health care and psychological support.

In particular, inadequate provision of barrier-free access to the premises of educational institutions and civil defence structures was found. Some institutions lack ramps, handrails, relief markings, and other devices for people with limited mobility, which makes it impossible or significantly more difficult for children with disabilities and other people with reduced mobility to access buildings and shelters. Separately, there was a discrepancy between the arrangement of sanitary facilities and the needs of children with disabilities.

During the monitoring visits, it was found that 10 educational institutions did not have a licence to carry out economic activities in medical practice, despite the actual functioning of medical offices and the provision of medical services to students. This is a violation of licensing legislation and creates risks of violating children's right to safe and appropriate medical care.

In addition, a number of institutions have identified staffing problems in the area of psychological and socio-pedagogical support. In particular, the positions of social educators remain vacant, which makes it difficult to provide social and pedagogical support to children and does not meet the Standard Staffing Standards for general secondary education institutions.

In 2025, the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Rivne region focused on protecting children's rights, in particular in the educational environment, where the problem of bullying and hidden conflicts persists.

This priority was determined by the results of the previous year: in 2024, Rivne region ranked first in terms of the number of appeals to the Ombudsperson's Office on bullying - **36** appeals were received during the year. The appeals were about cases of psychological pressure, physical aggression, cyberbullying, as well as the inaction of the administrations of individual educational institutions in responding to conflict situations. This trend has led to the need to strengthen the monitoring work of the Ombudsman's office in general secondary education institutions in the region.

The results of the visits showed that although schools formally have bullying prevention programmes, relevant commissions and record books, the latter remain empty. This indicates that administrations avoid open discussion of the problem, fear of admitting the existence of bullying due to reputational consequences, and a formalised approach to preventive work.

At the same time, during informal communication with students in almost every general secondary education institution, mentions of bullying, both psychological and physical, were found. The Ombudsman's Office also responded to high-profile cases of bullying and conflicts in educational institutions that were widely publicised on social media. This concerned both videos of fights between students and conflicts between students and teachers that caused a public outcry.

The Commissioner sent **6** official letters of response to education authorities and administrations of general secondary education institutions. Based on the results of their consideration, the facts of violations were established and disciplinary measures were taken against the perpetrators. In this regard, the Office has increased its attention to child protection in order to create a safe educational environment in which the rights of every child are in the centre of attention.

As part of the monitoring of the observance of children's rights, a local media outlet published a video showing a case of bullying in one of the region's educational institutions. In particular, during a choreography lesson, a group of students forced a classmate to undress.

In order to verify the information contained in the video and respond appropriately, the Commissioner sent relevant inquiries to the Main Department of the National Police in Rivne region, the Department of Education and Science of the Rivne Regional State Administration and the educational institution. Particular attention was paid to ensuring the protection of the child, establishing the circumstances of the incident, and the role of teachers.

As a result of the response, the fact of bullying was confirmed. The director of the educational institution, his deputy and the choreography teacher were subjected to disciplinary sanctions in the form of a reprimand. Criminal proceedings were opened under part one of Article 296 of the Criminal Code of Ukraine. In addition, a report on

an administrative offence under Article 184 of the Code of Administrative Offences was drawn up against the parents of the minor participants in the incident.

In 2025, the Representative Office's work with children who have suffered from or witnessed crimes became a separate area of activity. Given the complexity of such situations, the importance of a professional approach and the need for a safe environment for communication with the child, the focus was on implementing an interdisciplinary support model.

In March 2025, the Child Protection Centre was opened in Rivne, operating on the principle of the Barnahus model, an interdisciplinary approach to working with children who have been victims or witnesses of violence.

In 2025, the Centre conducted **49** child interviews and **3** on-site court hearings, which were held for the first time in Ukraine in a specially created, safe and child-friendly environment based on this model. All interviews were conducted in properly equipped rooms in compliance with the principles of protecting the best interests of the child.

3. Protection of the rights of citizens affected by the armed aggression against Ukraine

One of the most vulnerable categories of the population remains internally displaced persons who were forced to leave their places of permanent residence due to hostilities, occupation or threat to life.

As of the end of December 2025, according to the Rivne Regional Military Administration, the number of registered IDPs in the region was **42,654**. The main problematic issues that IDPs addressed to the Ukrainian Parliament Commissioner for Human Rights were inadequate living conditions, the exercise of the right to housing, and the receipt of pension and social benefits.

In 2025, Rivne region remained an important region for receiving internally displaced persons from the frontline areas, with a significant proportion of people of retirement age and people with limited mobility, including people with disabilities and people in need of care. During the reporting period, **38** evacuation trains arrived in the region, bringing **553** internally displaced persons. The IDPs were accommodated in temporary accommodation, social institutions, premises of closed general secondary education institutions, and in the private sector.

In order to monitor the observance of IDPs' rights, the Ombudsman's Regional Office conducted **29** visits to TACs in 2025 to monitor the observance of IDPs' rights in the place of temporary residence and compliance with the standards set out in the Procedure for the functioning of temporary residence places for internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of temporary residence places for internally displaced persons" dated 01.09.2023.

At the same time, monitoring in some TACs revealed inadequate living conditions for IDPs. Some of the facilities do not meet the requirements for temporary accommodation, in particular in terms of the duration of stay, access to household services and privacy, which creates risks of violating the rights of internally displaced persons to decent living conditions.

Of the **72** recommendations provided, **22** were implemented, **42** were in the process of implementation, and **8** were not implemented.

During a routine monitoring visit to ensure the observance of the rights of internally displaced persons in a place of temporary residence on the premises of a non-operational educational institution, the fact of residence of 6 people who arrived in Rivne region in August 2025 was established.

During the visit, the following violations were identified: sanitary facilities were not adapted for people with disabilities and needed to be repaired; furniture was worn out and in insufficient quantity; the water supply system needed to be updated, and the water in the taps was unfit for consumption. The temperature in the room was low, and one of the IDPs needed warm clothes.

Based on the report with a number of recommendations, the IDPs' right to adequate living conditions was restored, and the residents were moved to a newly created ICC with good living conditions. The premises are not used for the purpose of resettlement of internally displaced persons.

The situation has shown the need to further expand the network of temporary accommodation facilities, as the **60** temporary accommodation facilities in the region are insufficient to adequately meet the housing needs of **1,902** internally displaced persons. It is necessary to systematically address the issue of creating additional temporary accommodation facilities, bringing existing facilities in line with established standards, as well as attracting additional financial and logistical resources.

Employees of the Ombudsman's Office conducted a monitoring visit to the temporary accommodation facility, equipped on the basis of the Bugrynska Outpatient Clinic of General Practice of Family Medicine of the Bugrynska Village Council, located on the third floor of the building.

During the visit, it was found that the ICC premises required major repairs to the roof and utility networks, reconstruction to equip sanitary rooms and a kitchen, as well as interior finishing works to bring the living conditions in line with the minimum requirements of the ICC Functioning Procedure approved by Resolution of the Cabinet of Ministers of Ukraine No. 930 dated 01.09.2023.

In addition, the location of the ICC on the third floor did not meet the legal requirements for barrier-free access for internally displaced persons, including persons with disabilities and other people with reduced mobility. At the same time, another ICC was operating on the second floor of the same building, housing 30 people, including 4 persons with disabilities.

Based on the recommendations provided, the Rivne Regional Military Administration, together with the Rockada Charitable Foundation, took response measures and carried out a range of repair and restoration works. In particular, the lift was restored, which provided unimpeded access to the premises, and the technical condition of the building and living conditions were improved in accordance with the

established standards. This allowed 30 internally displaced persons, including persons with disabilities, to restore their right to accessibility and proper living conditions.

One of the priorities of the Ombudsman's activities in 2025 was to protect the social rights of internally displaced persons, in particular the right to receive state housing assistance. In order to ensure accessibility of IDPs' rights protection mechanisms, the Ombudsman's Office systematically conducted active work on receiving internally displaced persons, including through personal receptions and on-site events.

During the on-site reception of citizens, a citizen, who is an internally displaced person, addressed the Ombudsman's representative in Rivne region in one of the urban territorial communities to protect her right to receive accommodation allowance.

The applicant reported that in June 2024 she was forced to leave Donetsk region. Until May 2025, she received an IDP allowance for accommodation, which was a significant support for living and food. However, the payment was subsequently terminated due to the fact that the Department of Labour and Social Protection of the Executive Committee of the Ostroh City Council received information about the availability of additional income. According to the applicant, this information did not correspond to her actual property status and did not apply to her personally.

In order to clarify the circumstances, the Ombudsman's representative sent a letter to the Main Department of the Pension Fund in Rivne region and to the above-mentioned department with a request to assist in maintaining the right to receive the accommodation allowance.

As a result of the response measures, the IDP's right to receive the accommodation allowance was restored. The citizen received payments for 6 months of 2025.

4. Protection of citizens' rights to life and security

Particular attention was paid to the state of readiness and accessibility of civil protection facilities, including protective structures and shelters.

To this end, the Ombudsman's Office conducted **50** monitoring visits to civil protection facilities in Rivne region. The monitoring was carried out to assess the actual condition of the shelters, their suitability for their intended use, the level of accessibility for the population, including for people with disabilities and other low-mobility groups, as well as compliance with the requirements of the current legislation in the field of civil protection.

The monitoring visits revealed systemic issues of concern. In particular, in **22** shelters, the technical condition of the premises was found to be unsatisfactory, with limited or difficult access to them after hours and at night, as well as the lack of proper conditions for people with disabilities and other people with reduced mobility.

In addition, the visits revealed the absence or insufficient supply of drinking and process water, which is critical for people to stay in shelters for a long time, as well as inadequate or non-compliant fire extinguishing equipment. These shortcomings pose

additional risks to the life and health of the population in the context of emergencies and military threats.

The Ombudsman's Office conducted a monitoring visit to the State Institution "Preschool Education Institution (Nursery School) No. 6" to assess the state of readiness and proper arrangement of the shelter.

During the inspection, it was found that the shelter was functioning and used for its intended purpose, but its condition did not fully meet the requirements for safe and long-term stay of children and employees in the event of an emergency.

In particular, the shelter did not have an up-to-date evacuation plan with clearly defined routes, exits and an algorithm of actions in a critical situation. The shelter also failed to provide the necessary supply of drinking water and long-term storage products, taking into account the established standard of at least 2 litres of water per person per day. The issue of a backup power supply to maintain lighting, ventilation and communications in the event of a power outage also needed to be addressed immediately.

Special attention was also required for the shelter's capacity: the number of seats was insufficient to accommodate all participants in the educational process at the same time. Based on the recommendations, the administration of the institution carried out cosmetic repairs to the premises, provided it with Internet access, and installed signs inside the building with directions to the shelter, which is an important component of a quick and organised evacuation.

As a result of the visits, the Ombudsperson's Office took 50 response measures aimed at eliminating the deficiencies and bringing the protective structures in line with the established regulatory requirements. Given the ongoing security challenges, monitoring the condition of civil protection facilities and protecting the rights of citizens to safe conditions in shelters will remain a priority in 2026.

Of **the 158** recommendations provided, **112** were implemented, **18** are in progress, and **28** were not implemented.

5. Protection of the rights of persons held in places of detention

In 2025, the Ombudsperson's Office visited **21** institutions as part of the national preventive mechanism.

One of the most problematic issues identified during the monitoring visits remains the provision of proper care and custody for disabled citizens who do not have family support. Not all territorial communities have identified the provision of social services for the elderly as a priority. This has a direct impact on the level of funding and the state of maintenance of communal facilities where such people live.

Residential and geriatric institutions are often overcrowded and **understaffed**, which creates preconditions for human rights violations, including the right to an adequate standard of living, health care and medical assistance. During a visit to the Rivne Psychoneurological Boarding School of the Rivne Regional Council in Orlivka, facts of violations of the rights of the wards related to inadequate living conditions were recorded, which required an immediate response.

During the visit to the department No. 2 of the Municipal Institution "Rivne Psychoneurological Boarding House" of the Rivne Regional Council in Orlivka village, the NPM monitoring group revealed facts of violation of the rights of the wards. It was established that this department is home to mostly incapacitated persons, but the conditions of their detention do not meet basic standards of decent living: the rooms lack the necessary furniture, the wards sleep on shell beds, and the sanitary and hygienic rooms are in extremely poor technical condition. The premises are not adapted to the needs of persons with disabilities, which creates additional difficulties and violates their basic rights.

During the visit to the ward, a tense, anxious atmosphere among the inmates was also noted. A significant number of people showed signs of agitation and anxiety, which may indicate psycho-emotional discomfort and insufficient quality of medical care.

Following the report with a number of recommendations to the management of the above-mentioned institution, more than 100 inmates were transferred to the renovated building of the Ostroh Psychoneurological Boarding School of the Rivne Regional Council, which was an important step in ensuring their rights and decent living conditions.

The Ombudsman's office paid special attention to visiting privately owned nursing homes for the elderly "Autumn of Life", "Orchid" and "Healthy House".

All of the facilities lacked licences to carry out medical practice and an agreement with a healthcare facility, and the size of the sleeping quarters did not meet the established standard of living space per person. In addition, boarding houses do not have daily, long-term and dietary menus, which makes it impossible to provide a variety of food and calculate the energy value of food products.

Violations of the rights of persons with disabilities and people with reduced mobility were also identified, as the premises of the nursing homes were not adapted for their accommodation and maintenance. The relevance of this issue has increased significantly in the context of martial law, which is accompanied by an increase in the number of people with disabilities and people with reduced mobility.

During the visit to the private retirement home "Autumn of Life", a number of significant violations of the rights of the residents were identified.

In particular, it was found that not all residents gave their informed and personal consent to be placed and stay in the facility. Care agreements were concluded with relatives of legally capable persons without proper confirmation of their authority to represent the rights and interests of the residents, and the administration of the institution did not require relevant documents. This practice created risks of violating the right to independent decision-making and free choice of place of residence.

In addition, for persons with disabilities and people with limited mobility, the premises of the nursing home were not fully adapted to their needs: living rooms were not equipped with call buttons for staff, and there were no handrails in the corridors, on ramps and in the bathrooms. In the institution, where some of the residents lived above the first floor, there was no lift, which made it difficult to move around safely.

There were also violations of the requirements for the storage of medicines and the lack of an approved menu, which affected the provision of an adequate level of care and transparency of food.

Based on the results of the visit, the Ombudsman's representative provided recommendations to the nursing home administration to eliminate the identified violations and bring the institution's activities in line with the requirements of the law and human rights standards. Accordingly, the institution took response measures and ensured that personal written applications for consent to stay in the nursing home were received from legally capable wards or that their interests were duly represented; service contracts were reviewed and renegotiated; living rooms were equipped with call buttons, handrails were installed in common areas, proper storage of medicines was organised and the menu was approved.

During the visits to 9 courts in Rivne region, violations of human rights were identified, in particular the rights of persons held in custody and involved in criminal proceedings.

In particular, violations of the right to protection from torture and cruel or degrading treatment, as well as the right to proper conditions of detention were found. It was found that the number of cells for accused (defendants) and convicted persons in courts does not meet the normative calculation - at least three cells for each courtroom where criminal cases are heard. This situation may lead to non-compliance with the requirements for separate detention of men and women, adults and juveniles.

In 4 courts: Zdobuniv, Demydiv, Hoshcha district courts and Varas city court - there are no separate sanitary facilities for defendants (convicts), and therefore they are forced to use the toilet rooms intended for visitors. This creates additional risks of prohibited items getting into them and negatively affects the security situation.

Violations of the right to professional legal assistance were also recorded in 7 courts: Rivne, Zdolbuniv, Demydiv, Hoshcha, Zarichne district courts, Varas and Rivne city courts - there are no specially equipped premises to ensure confidential communication between lawyers and accused (defendants) and convicts.

There were violations of the requirements for ensuring the safety of other persons. In 6 courts, namely: Zdolbuniv, Demydiv, Hoshcha, Zarichne district courts, Dubno and Varas city courts - there are no isolated routes for escorting defendants (convicts) from cells to courtrooms. As a result, they are escorted through corridors open to unauthorised persons, which creates the possibility of uncontrolled contacts with visitors or persons who are prohibited from communicating with each other.

During the monitoring visit to the Rivne City Court, representatives of the National Preventive Mechanism found that the institution did not have an isolated route for escorting accused and convicted persons from the holding cells to the courtroom for consideration of criminal cases. The accused, defendants (convicts) were escorted through corridors accessible to third parties, which led to a violation of their rights and the rights of others to safety.

As a result of the visit, the judicial authorities were provided with recommendations to ensure a separate, secure convoy route.

The above-mentioned court took organisational measures to separate the routes, which allowed to eliminate the violations and restore the guaranteed right to security during the stay in court.

During the monitoring visits to the National Police units in the region, violations of the standards of treatment of detainees were identified, indicating inadequate guarantees of protection against torture and other forms of cruel, inhuman or degrading treatment or punishment. In particular, the premises for holding detainees are either absent or in a condition that does not meet the requirements of Ukrainian legislation and international standards, and therefore cannot be used for their intended purpose.

The identified conditions do not ensure an adequate level of security, respect for human dignity and humane treatment of persons held in police units. Of particular concern is the lack of accessible sanitary infrastructure for persons with disabilities and other groups with reduced mobility. This situation makes it impossible to fulfil basic sanitary and hygienic needs while in institutions, which leads to a violation of the principles of equality, non-discrimination, respect for human honour and dignity, and the right to health care.

Of the **187** recommendations provided, **64** were implemented, **77** were in the process of implementation, and **46** were not implemented.

6. Protection of information rights

In 2025, the Mission's team carried out **42** inspections of the observance of human and civil rights to information by public authorities and territorial communities regarding the observance of the right of citizens to appeal and access to information.

The following violations have become systemic: there is no information on the telephone number and working hours of the hotline, the published landline number does not include the locality code; telephone numbers listed on websites do not work; there is no or incomplete information on the procedure for access to public information, a list of open data sets, financial reports and draft decisions of local councils. In particular, only 5 territorial communities in the region publish reports on the consideration of requests for information on their websites, and less than half of the communities have an up-to-date schedule of personal reception of citizens.

There are also 4 cases of outdated information that has not been updated for more than two years, and **8** communities' websites do not have separate sections on access to public information. The analysis shows that an adequate level of information transparency of local self-government bodies helps to reduce the number of individual requests for information and citizens' appeals, as most of the information required is available online. This approach allows for more efficient allocation of government resources and prevents cases of abuse of information rights.

Of the **143** recommendations provided, **75** were implemented, **31** were partially implemented, **18** were in progress, and **19** were not implemented.

In October 2025, a citizen B. and the editor-in-chief of a journalistic agency filed a complaint with the Ombudsman against the refusal of officials of the Department of Social and Veteran Policy of the Rivne City Council to provide public information. The subject of the request was the list of persons and determination of their status (persons with disabilities as a result of war or family members of fallen defenders of Ukraine) who received compensation for the purchase of housing in 2024, as well as other related information.

In its response to the request, the Department noted that the requested information contained personal data and was classified as restricted information, and therefore could not be provided.

As part of the parliamentary control over the observance of the right to access public information, the Department was provided with additional explanations on the application of the current legislation, in particular the principle of proportionality and the need to justify the restriction of access to information.

Following the review, the applicants' right to access public information was restored: The Department provided the requested information in full.

When restricting access to confidential, proprietary or secret information, information managers are required to apply a three-part test. The procedure for its application is set out in part two of Article 6 of the Law of Ukraine "On Access to Public Information". The monitoring showed that one of the most common problems among information administrators is the non-application or formal application of certain criteria of this test, which contradicts the requirements of the law.

Citizen Kh. filed a complaint with the Ombudsman regarding violation of her right to information by the Department of Economic Development and Trade of the Regional State Administration in connection with classification of the list of enterprises that were granted the status of critical for the functioning of the economy and life support of the population of the region as restricted information.

Based on the explanations provided by the Ombudsman's Secretariat, the Department reconsidered the request of citizen Kh. and provided justification for restricting access to the requested information, taking into account the requirements of part two of Article 6 of the Law of Ukraine "On Access to Public Information".

RECOMMENDATIONS:

Rivne Regional State Administration, Regional Military Administration:

take measures aimed at improving the living conditions of internally displaced persons in places of temporary residence in Rivne region, in accordance with the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons";

take measures to increase the number of temporary accommodation places for internally displaced persons;

ensure accessibility to municipal and state-owned institutions for persons with disabilities;

increase expenditures on the maintenance of social protection institutions to create appropriate conditions for the wards/inmates.

Local self-government bodies:

Ensure that information provided for by the Law of Ukraine "On Access to Public Information" and "On Citizens' Appeals" is published on official websites:

Ensure that information on the procedure for exercising the right of citizens to appeal is posted in an accessible format on the official website and in the premises of the institution. Provide an opportunity to submit oral appeals via the telephone network with mandatory recording of such appeals;

publish on the official website information of public interest, including information on the procedure for submitting requests for information, the procedure for appealing decisions, actions or inaction, information on vacancies and competition conditions, as well as places where the necessary forms and blanks can be obtained;

ensure the arrangement and refurbishment of shelters on the territory of communities for the civilian population, in particular on the territory of healthcare, education and social protection institutions, and exercise constant control over the free access of citizens to them;

to ensure proper organisation and control over the implementation of measures to prevent and combat bullying (harassment) in general secondary education institutions, in particular:

intensify the work of commissions to review cases of bullying;

to ensure proper maintenance of logs of appeals and reports of conflicts and manifestations of bullying;

create conditions in educational institutions for students to report violations of their rights in a safe and confidential manner;

support the development of student self-government tools;

to take measures to ensure appropriate conditions for the work of practical psychologists and social pedagogues in general secondary education institutions, in particular:

to provide separate, properly equipped premises for individual and group consultations in compliance with the principle of confidentiality;

to facilitate the provision of specialists with the necessary methodological materials, diagnostic tools and opportunities for professional development;

facilitate the organisation of thematic classes, trainings and educational activities for students in educational institutions aimed at developing emotional competence, non-violent communication and mediation skills;

to ensure control over the prevention of cases of medical services being provided in educational institutions without a relevant licence.

To the Main Department of the National Police in Rivne region:

to ensure compliance with the standards of humane treatment of detainees, in particular by bringing the premises for detainees in line with the requirements of national

legislation and international standards and their actual functioning, as well as by arranging and ensuring accessibility of sanitary facilities for persons with disabilities and low-mobility groups.

To the Main Department of the State Emergency Service of Ukraine in Rivne region:

Organise and conduct inspections of the readiness of civil protection facilities in the region. During the inspections, ensure that the following is recorded: the number of inspected facilities, acts drawn up, violations identified, response measures taken, number and share of violations eliminated.

Rivne Regional TCC and JV:

Ensure acceptance, registration and timely consideration of citizens' appeals/inquiries in all structural units of the TCC and JV in the region;

to conduct additional briefings and training of employees on the requirements of the law, standards of lawful behaviour and proper communication with citizens during mobilisation activities and military registration;

strengthen internal control over the activities of employees by

- mandatory in-house inspections for each fact of possible misconduct;
- bringing the perpetrators to disciplinary responsibility in accordance with the procedure established by law.

The territorial department of the State Judicial Administration of Ukraine in Rivne region and the courts of Rivne region:

to ensure the elimination of systemic violations in the courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated convoy routes and arranging rooms for confidential communication with lawyers;

strengthen logistical support to guarantee the observance of human rights, in particular the rights to dignity, security, accessibility and effective defence.

11.17. Sumy Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **3,550** appeals from Sumy region, containing **4,058** reports of human and civil rights violations. The most frequently mentioned human rights violations in the reports were: civil rights - **2,744** reports, social rights - **272** reports, economic rights - **198** reports, and children's rights - **103** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	810	2 192	3 155	3 550
Reports of rights violations	1 055	2 566	3 543	4 058

Sumy region has one of the longest stretches of state border with the aggressor country, with a length of 563 km. During the full-scale war, the entire civilian infrastructure of the region's border communities was virtually destroyed. The population was evacuated. Internally displaced persons mostly choose to continue living in Sumy region. These circumstances create additional risks for the realisation and protection of human rights, including the right to security, housing, social protection, medical care and access to public services.

In 2025, one of the important activities of the regional office will be the exercise of parliamentary control over the observance of the constitutional rights and freedoms of citizens who have evacuated from the border communities of Sumy region, where active hostilities are currently taking place, as well as the rights of persons liable for military service, reservists, servicemen and family members of servicemen who have been captured, gone missing, died on the battlefield or died of injuries.

In addition, in accordance with the provisions of international humanitarian law, in particular the Fourth Geneva Convention (1949), the Mission's staff continued to systematically monitor the observance of the rights of civilians of the Russian Federation who, fleeing regular shelling by their own army, voluntarily evacuated to the territory of Ukraine from the border areas of the aggressor country. During the visits, such persons were assisted in establishing communication channels and communicating with representatives of the UN Refugee Agency in Ukraine, representatives of and ICRC and charitable NGOs at the regional, national and international levels.

Monitoring visits/on-site inspections

Monitoring of human and civil rights observance by state authorities, local self-government bodies, institutions, organisations, etc. remains an important area of work. In 2025, the team of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Sumy region conducted **140** monitoring visits.

In the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention, **13** monitoring visits were carried out. In the reporting period, the regional office also conducted **51** monitoring visits in the area of child protection; **71** monitoring visits in the area of protection of the rights of persons affected by the armed aggression against Ukraine, including **4** monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine",

44 monitoring visits to shelters in Sumy and territorial communities of the region, **23** monitoring visits to places of temporary residence of internally displaced persons, as well as **5** monitoring observations of compliance with procedural rules and regulations.

Educational activities

In order to raise awareness about the protection of human and civil rights and freedoms, the Regional Office of the Ombudsman in Sumy region held **104** legal awareness-raising events in the territorial communities of the region. These events were targeted at community residents, local government officials, employees of educational, social and municipal institutions and had a clear practical focus. This format allowed not only to raise legal awareness, but also to prevent typical human rights violations and reduce the number of repeated appeals from citizens.

In cooperation with the educational community of the Lebedyn community, the regional office elected the first School Ombudsman in the region in November 2025. The introduction of the School Ombudsman institution has intensified student self-government and contributed to the formation of a safe educational environment. Community educational institutions have started procedures for identifying candidates for the election of School Ombudsmen and introduced anonymous reporting mechanisms, which allows for a more rapid response to bullying cases. Given the positive results, the regional office plans to scale this practice to other educational institutions in the region as an effective tool for protecting children's rights and developing a democratic culture.

The main issues that the Ombudsperson's Office worked on

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of children's rights;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of information rights of citizens;
- protection of human rights in places of detention.

1. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances

In 2025, the team of the regional office processed **46** appeals from servicemen and war veterans. The main categories of issues addressed by the defenders of Ukraine include incorrect determination of the degree of disability and disability group, prolonged

approval by regional military medical commissions of conclusions on unfitness for further military service, accrual of financial support and additional remuneration, and unjustified establishment of facts of unauthorised abandonment of a military unit or combat positions.

The Regional Working Group of the Coordination Headquarters on the Treatment of Prisoners of War is permanently operating on the basis of the Representative Office, whose main tasks are to protect the rights of families of prisoners of war, missing servicemen and civilians, as well as to establish effective interaction between government agencies, departments and public initiatives. The group's activities are aimed at creating a sustainable system of support for families experiencing the consequences of war. The Working Group regularly receives citizens who apply to both the CSWG and the Regional Office for the observance of the rights of servicemen and their families. Additionally, the group members communicate online on a regular basis, which allows them to provide prompt explanations and consultations within their competence, including outside the days of the working group meetings. The group members participate in meetings with families of prisoners of war and missing persons at least once a month, providing answers to questions at . This format of interagency cooperation demonstrates practical effectiveness and contributes to improving the quality of response to appeals in the area of observance of rights in the security and defence sector.

In the context of the armed aggression against Ukraine, systematic meetings with the families of prisoners of war, the dead and missing are an important element of supporting and protecting their rights. In 2025, the Mission organised and held **14** large-scale meetings with members of the regional working group of the Coordination Headquarters for the Treatment of Prisoners of War, representatives of the Commissioner for Persons Missing in Special Circumstances, military units of the Armed Forces of Ukraine, the National Guard of Ukraine, the State Border Guard Service of Ukraine, TCC and JV bodies, the National Police of Ukraine, the Security Service of Ukraine, the Sumy Forensic Research Centre of the Ministry of Internal Affairs of Ukraine, the Pension Fund of Ukraine, the International Centre for the Protection of Human Rights and Freedoms, the International Centre for the Protection of the Human Rights of Persons with Disabilities, the International Centre for the Protection of Human Rights and Freedoms of the International Association of the Red Cross, the International Association of the Red Cross, the International Association of the Red Cross, the International Association of the Red Cross, the International Association of the Red Cross, the International Association of the Red Cross for the Protection of Human Rights and Freedoms of the Red Cross. In total, **650** family members of Ukraine's defence personnel took part in such meetings in 2025.

In August 2025, during a regular meeting with the families of servicemen in the Romny district of Sumy region, the mother of a missing serviceman addressed the Regional Office. She reported the missing of another defender - serviceman O., her son's comrade-in-arms, who disappeared with him on a combat position in January 2025.

It was established that, despite the fact that eight months had passed since the disappearance, the National Police had not searched for serviceman O. The fact of the disappearance was not registered either in the Unified Register of Pre-trial Investigations or in the Unified Register of Persons Missing in Special Circumstances. The reasons for this were the inaction of the military unit in which O. served, as well as the absence of relatives and friends who could have filed a police report on his disappearance.

The Regional Office responded to the information received by means of official e-mail correspondence with the command of the military unit, units of the National Police of Ukraine, a representative of the Commissioner for Persons Missing in Special Circumstances and the local government at the place of residence of the serviceman.

Thanks to interagency cooperation, in early November 2025, criminal proceedings were opened over the missing disappearance of serviceman O., and his information was entered into the Unified Register of Persons Missing in Special Circumstances, and his right to search and officially document the circumstances of his disappearance was renewed.

A separate area of the Mission's work is monitoring the observance of the rights of persons liable for military service during mobilisation activities. In 2025, the Ombudsman's Office in Sumy region processed **16** reports of alleged human rights violations by employees of territorial recruitment and social support centres during notification and other mobilisation activities.

The most common complaints were about:

- Restriction of freedom of movement during detention and transfer to the TCC and the JCC;
- concealment of information about detained citizens;
- failure to provide or impede the exercise of the right to professional legal assistance, in particular, the non-admission of lawyers;
- Failure to take into account documents confirming the right to deferral;
- lack of proper recording of the facts of detention;
- a formal approach to medical examinations and failure to take into account medical documentation by military medical commissions at the TCC and JFO.

In order to eliminate systemic problems and establish effective mechanisms of working communication, the regional office held **4** meetings with representatives of the TCC and JV in 2025. The meetings were attended by representatives of law enforcement agencies, the legal community, the leadership of military medical commissions, the

military law enforcement service and other relevant specialists, as well as clergy of various religious denominations.

As a result of the work done, agreements were reached with the management of the Sumy Regional TCC and JV on

- arranging special rooms in each MCC and JFI for confidential communication between lawyers and persons brought in for military medical examination and military registration procedures;
- strengthening interagency cooperation at the regional level;
- conducting legal education activities for the staff of the TCC and the JV to raise awareness of human rights and standards of proper treatment of citizens.

In pursuance of the agreements reached, as of the end of the year, four territorial recruitment and social support centres had separate isolated rooms for confidential meetings between lawyers and clients. As a positive result of the work done, the regional office notes a gradual decrease in the number of signals regarding the non-admission of advocates to their clients during their stay in the TCC and JV, which indicates an improvement in compliance with the guarantees of the right to legal aid.

2. Protection of children's rights

In 2025, **51** monitoring visits were carried out to monitor the observance of the rights of children, orphans and children deprived of parental care, as well as children in difficult life circumstances.

The monitoring covered the observance of the rights and freedoms of children in difficult life circumstances, the activities of guardianship and custody authorities to ensure the property and housing rights of children, as well as the exercise of the right of a child to be brought up in a family or in conditions close to family.

In particular, **24** monitoring visits were carried out to the services for children in territorial communities, which resulted in the preparation and submission of relevant reports with recommendations for eliminating the identified violations.

During the monitoring visits, a number of systemic shortcomings were identified in the activities of children's services. In most communities, interdisciplinary teams function formally: there is no established interaction, and specialists do not have information about each other. There are cases of improper management of children's personal files and a lack of systematic preventive work with families. Some communities deliberately fail to register families in difficult life circumstances in order to reduce the workload, which leads to the deepening of crisis situations.

The Ombudsman's regional office, while communicating with the applicant, who sought to find her missing son, a serviceman of the Armed Forces of Ukraine, received information about possible violations of the rights of three young children in a rural settlement of the region, where the family lived in inadequate sanitary conditions, the children did not attend educational institutions and were not provided with the necessary care. The children's mother received a salary from her husband, a missing military serviceman, but did not pay due attention to the children's upbringing and care.

After receiving this information, the Mission immediately sent a response letter to the village council and the local community children's service, indicating specific measures to be taken to restore the rights of the children in this family.

Based on the results of the measures taken, the family's living conditions were examined, their needs were assessed, and preventive work with the mother was carried out. The children were registered as being in difficult life circumstances. Later, the local starosta and teachers of the village gymnasium helped the family repair their home, provided firewood for the heating season and restored the children's involvement in the educational process.

In the context of the armed aggression against Ukraine, one of the challenges for the child protection system is to organise the evacuation of local government bodies in frontline communities, including children's services and social service centres, and to ensure their full-fledged operation at new locations. It is not only about the physical relocation of institutions, but also about ensuring the continuity of child protection functions, preservation of official documentation, coordination between child protection actors and the effective work of interagency and multidisciplinary teams.

The analysis of the results of monitoring visits shows that some services, despite difficult organisational and security conditions, were able to quickly resume work in new locations, establish cooperation with partners and even proactively digitise official documents and create backup copies to prevent their loss. At the same time, there were also cases when some evacuated services, having moved to relatively safe conditions, delayed the resumption of full functioning, which created risks to the proper protection of children's rights.

In 2025, specialists of the regional office conducted a monitoring visit to the centre for social services and children's services in one of the frontline communities in Sumy region to exercise parliamentary control over the observance of the rights of children in difficult life circumstances, as well as orphans and children deprived of parental care.

During the visit, it was found that both institutions were actually evacuated to the regional centre, but there were no administrative documents on the evacuation,

information on the relocation and storage of official documentation, including children's personal files containing sensitive personal data. At the new location, the monitoring group was not provided with access to the centre and service staff, official documents and other data storage devices, which made it impossible to monitor the activities of the visited institutions. The monitoring group was also not provided with evidence of proper storage of personal files, which created a risk of their loss and violation of personal data protection legislation.

The identified circumstances indicated a lack of proper coordination and control by the local government, which posed a threat of violating children's rights and failing to fulfil state guarantees of their social protection in the context of evacuation.

In order to address the identified violations, the Ombudsman made a submission demanding that the identified violations be immediately addressed and the rights of the community's children be protected, that the social service centre and the children's service be restored to proper functioning, that an internal investigation be conducted into the possible loss of documents, and that the evacuation decision be provided, information on the safety of documents and a plan for the resumption of the institutions' work.

Pursuant to the legal requirements of the Ombudsman, the village council confirmed that the official documents were preserved and not lost after the evacuation, identified and documented the temporary locations of the children's service and the social services centre, and provided copies of the administrative acts on the evacuation and organisation of the work of the institutions at the new locations.

In the context of decentralisation, the low institutional capacity of communities to exercise their adoption powers remains a problem due to staff shortages, lack of methodological support and proper control, which creates risks of a formal approach and delays in procedures.

In addition, the living conditions of evacuated children, including orphans and children deprived of parental care, are not properly monitored, there is no up-to-date information on their whereabouts, and personal files are incomplete. The situation with children abroad remains particularly difficult due to the lack of a clear mechanism for intergovernmental cooperation, which creates risks of violations of their rights.

In 2025, the Mission's team conducted **13** monitoring visits to social service centres, during which it identified a systemic problem - the lack of proper interagency cooperation between such centres, children's services, the National Police and representatives of territorial communities, which complicates the provision of comprehensive assistance to families in difficult life circumstances and prevents the prevention of child abandonment.

During a monitoring visit to one of the border communities from which the population was evacuated, it was found that there was inadequate organisation of response to a mother's refusal to take her newborn child from the maternity hospital.

The local children's service sent a request to the Centre for Social Services to clarify the circumstances of the child's abandonment and to provide social support to the mother in order to change her intentions and create appropriate conditions for her to fulfil her parental responsibilities. However, the Centre did not provide any information or confirm that it had fulfilled its obligations. The absence of consultations with the mother and a needs assessment act was found to be contrary to the requirements of the Resolution of the Cabinet of Ministers of Ukraine No. 587 "On the Organisation of Social Services Provision".

Based on the results of the monitoring visit, a report was drawn up and response letters were sent to the Service for Children and the Centre for Social Services with specific recommendations for urgent elimination of the identified shortcomings in the organisation of child protection activities.

Subsequently, following the recommendations of the representative of the Ombudsperson in Sumy region, the Centre for Social Services with the participation of the staff of the Children's Service made a visit to the mother's place of residence, assessed the family's needs, and organised counselling and psychological support. Following the work carried out, the mother filed an application for the return of the child, and the issue was considered at a meeting of the commission for the protection of children's rights of the executive committee of the village council, which resulted in a decision to return the infant to the family and the relevant conclusion was approved by the executive committee.

The child's right to be brought up in a family was restored.

Particular attention was paid to the observance of children's rights to a safe educational environment. To this end, the Regional Office of the Ombudsman in Sumy region conducted **9** monitoring visits to educational institutions, which revealed systemic violations, including: non-compliance with accessibility requirements for children with disabilities, staff shortages and lack of psychological support, violations of the procedure for organising meals and providing medical care to students.

The office also conducted **5** visits to health care and social protection institutions in the region, with recommendations mainly related to improving the material and technical base, arranging shelters and creating a barrier-free environment.

The regional office systematically monitors social media, local media and other open sources to identify information about possible violations of children's rights and legitimate interests. If such cases are recorded or relevant information is received from other sources, the staff of the Representative Office promptly takes response measures aimed at restoring children's rights and eliminating the causes that led to their violation.

Based on the results of the monitoring visits, the Regional Office of the Ombudsperson in Sumy region prepared and sent **76** response letters. These letters drew

the attention of heads of institutions, establishments and local self-government bodies to the identified shortcomings that create risks of violation of children's rights, and provided **211** specific recommendations for their elimination.

An analysis of the reports received on the status of implementation of the recommendations shows that a significant number of recommendations - **94** - have been fully implemented, **78** - are in the process of implementation. At the same time, **39** recommendations remain systematically unimplemented, the implementation of which requires significant financial and material and technical resources, in particular, the construction and arrangement of shelters, expansion of living space, and an increase in the number of specialists in children's services.

3. Protection of the rights of persons affected by the armed aggression against Ukraine

According to the Department of Social Policy, Veterans and Reintegration of the Sumy Regional State Administration, as of the end of 2025, **102,385** internally displaced persons were registered in Sumy region, including **21,643** children, **6,504** people with disabilities, and **26,907** pensioners. In 2025, **22,807** internally displaced persons were registered in the region, including **20,257** residents of Sumy region.

Due to new waves of evacuations from frontline communities, the number of temporary and compact accommodation facilities is increasing in Sumy and the region. As of the end of 2025, there were **24** temporary accommodation facilities in **11** territorial communities, **5** compact accommodation facilities, as well as transit centres and hubs in the regional and district centres of the region.

In 2025, the Mission conducted **23** monitoring visits to IDPs' temporary accommodation. Systemic problems include the failure of the ICC management to submit documents for compensation for accommodation costs, fungal infestations of the premises, non-working ventilation systems, and the accommodation of the elderly on the upper floors of buildings, which makes it difficult for them to move around.

Based on the results of the monitoring visits, the Regional Office of the Ombudsman in Sumy Oblast prepared and sent **16** response letters, in which **37** recommendations were provided to the balance holders and responsible persons to eliminate the identified shortcomings. As of the end of 2025, **13** recommendations were fully implemented, and **24** recommendations were in the process of being implemented.

Compared to 2024, there has been a positive trend in terms of improving the condition of the premises used for temporary accommodation, increasing the level of response to the Mission's recommendations and generally improving living conditions.

At the same time, certain recommendations remain unimplemented, the implementation of which requires significant financial resources and construction work,

including the redevelopment or reconstruction of premises, construction and arrangement of shelters, expansion of living space, and relocation of residents to the lower floors of buildings.

By exercising its control and monitoring powers, the regional office received signals about the need for basic foodstuffs for the population affected by the armed aggression, including internally displaced persons. In order to improve the situation of vulnerable categories of citizens, cooperation with charitable organisations was initiated, which resulted in the transfer of food packages to affected residents of the region, including IDPs, including those living in temporary accommodation.

The armed aggression against Ukraine has caused massive displacement of citizens, including persons with disabilities and other people in need of additional state support. In the context of evacuation, staying abroad and loss of usual mechanisms of communication with the authorities, the issue of unimpeded access to social benefits and administrative procedures becomes particularly relevant. The regional office of the Ombudsman in Sumy region systematically takes measures to respond to signals of violations of the rights of internally displaced persons and citizens who are forcibly outside Ukraine, in particular, to the termination or complication of access to pension and social benefits. In each such case, an individual review of the application is ensured, legal clarifications are provided and interaction with the relevant authorities is established to remove administrative barriers and restore the violated rights.

In the autumn of 2025, an internally displaced resident of one of the frontline communities, whose wife, a person with a disability of group I, evacuated to the Republic of Poland with her daughter after the start of the full-scale invasion, applied to the Regional Office of the Ombudsman in Sumy region. The wife's pension had been transferred to her bank account for a long time, but due to the lack of funds, the account was blocked and payments were sent to the Ukrposhta branch.

Despite having a notarised power of attorney from his wife, apostilled and translated into Ukrainian, the Pension Fund authorities refused to resume payments, citing internal rules that allegedly require a pensioner to personally submit an application for the resumption of payments. Due to her health condition and the remoteness of her place of residence from consular offices, it was impossible for the applicant's wife to fulfil this requirement.

Using the explanations provided by the regional office staff to the applicant during a personal reception, as well as to his daughter and wife who were abroad, the applicant's wife was able to undergo physical identification at the Pension Fund of Ukraine via video conferencing.

Thanks to the prompt response of the Ombudsman's representative in Sumy region and cooperation between the Pension Fund of Ukraine, the bank and the post office, the applicant was granted access to his wife's pension funds, which allowed

him to remove barriers to the exercise of the right to social protection guaranteed by law.

An important activity of the regional office in the field of protection of the rights of victims of armed aggression against Ukraine is to conduct systematic monitoring visits to the simplest shelters and protective structures where people can stay during air raids and other threats. Particular attention is paid to shelters that are on the balance sheet of educational institutions, as they are used by both participants in the educational process and community residents.

In 2025, the regional office conducted **44** monitoring visits to shelters in educational institutions of different levels. The visits assessed the condition of the premises, sanitary and hygienic conditions, availability of emergency lighting, ventilation, communication equipment, medical kits, information materials, and unimpeded access for people with disabilities and other low-mobility groups.

Despite the generally relatively adequate level of shelter equipment, the analysis of the results of the visits showed the existence of typical and systemic shortcomings, including the lack of sufficient supplies of drinking water, long-term storage food, and the inadequacy of most shelters to meet the needs of persons with disabilities and people with reduced mobility.

4. Protection of citizens' information rights

Throughout the year, the Regional Office of the Ombudsman in Sumy region monitored the observance of information human rights through the prism of the appeals received for consideration. In total, in 2025, the regional office received **103** such appeals. The analysis of the violations identified shows that there are systemic problems in this area. The overwhelming majority of written appeals from citizens considered by the employees of the regional office's concerned violations of the rights to appeal (**60** appeals) and to access public information (**39** appeals). The key issues addressed by the applicants were: failure to respond to appeals, improper consideration of appeals, unreasonable restriction of access to public information, failure to meet deadlines for consideration of appeals or requests for information, etc.

While processing an appeal from a civic organisation, the office found out that the executive committee of one of the city councils of the region had adopted a decision instructing the responsible officials of local self-government bodies to temporarily suspend responding to requests for public information until the martial law was lifted or terminated.

This decision contradicted the requirements of Article 22 of the Law of Ukraine "On Access to Public Information" and Article 34 of the Constitution of Ukraine, which guarantee the right of everyone to freely receive and disseminate

information and do not provide for the possibility of a complete suspension of consideration of requests for public information even under martial law.

In order to eliminate the identified violations, the Commissioner filed a motion to cancel the illegal decision of the Executive Committee.

As a result of the Commissioner's response, the unlawful decision of the local self-government body was cancelled, thus restoring the requesters' right to access public information held by the city council.

In cases where public information administrators, despite explanations of the requirements of the current legislation provided by the representative of the Commissioner in Sumy region, did not eliminate the identified violations and continued to create artificial obstacles to access to information, the Regional Office staff initiated procedures to bring the perpetrators to administrative responsibility.

A news agency filed a complaint with the Commissioner regarding the failure of a utility company to respond to an information request on remuneration of the company's management. The information administrator refused to consider the request, citing the lack of an electronic signature and "impossibility to confirm the authenticity of the document", and demanded confirmation of the requestor's identity.

The Commissioner's representative provided explanations on the requirements of the Law of Ukraine "On Access to Public Information", in particular that electronic signature is not mandatory for requests, and the requirement to confirm the identity of the requestor is contrary to the law.

Despite official explanations and a proposal to reconsider the request on the merits twice, the utility company did not eliminate the violations and did not provide the information to the requestor.

Officials of the regional office drew up a report on an administrative offence under part two of Article 212³ of the Code of Administrative Offences against the company's director and sent it to the court at the place of the offence. As a result of the court hearing, the head of the municipal enterprise was found guilty of violating the legislation on access to public information and an administrative penalty in the form of a fine was imposed.

5. Protecting human rights in places of detention

During 2025, the team of the Regional Office of the Ombudsman in Sumy region systematically and consistently visited places of detention to monitor the observance of human rights and freedoms, as well as to assess the conditions of detention in accordance with national legislation and international standards. During the reporting period, 12 visits were conducted to places of detention managed by the National Police of Ukraine, the State Judicial Administration, the Ministry of Social Policy and the Ministry of Education.

During the visits, a number of shortcomings were identified that negatively affect the safety, dignity and proper conditions of detainees in these institutions. In particular, the lack of equipped shelters was found, which is particularly critical in the context of martial law and constant threats to human life and health. Of particular concern is the inadequate condition of sanitary facilities, which are not adapted to the needs of people with limited mobility, which creates discriminatory conditions and limits the access of such persons to basic services. Based on the results of the visits, **24** response letters were sent with recommendations to eliminate the identified violations. In total, the Regional Office provided **116** recommendations in this area of work.

During the NPM's monitoring visit to one of the territorial units of the National Police in the region, it was established that the formal implementation of barrier-free requirements was not met, which made it virtually impossible for persons with disabilities and other low-mobility groups to access the building. In particular, a metal mesh fence was installed around the entrance to the police station with one controlled and lockable passage. The ramp at the entrance rested against this fence, which blocked physical access to the door of the police station and made it impossible for people with reduced mobility to move independently.

Based on the results of the monitoring visit, a report was drawn up with recommendations for eliminating the identified violations.

In response, the Main Directorate of the National Police took measures to eliminate the shortcomings. An additional passage in the fence was installed within the ramp path, which allowed for unimpeded access to the building and created appropriate conditions for people with disabilities and other people with limited mobility.

The Regional Office continuously monitors the implementation of the recommendations of the NPM visits. As practice shows, a significant part of the recommendations provided has been implemented, and the identified human rights violations or shortcomings that create risks of such violations have been eliminated. However, it should be noted that some of the recommendations concerning additional, and sometimes quite substantial, funding are still pending. Thus, as of the end of 2025, **46** out of **116** recommendations have been fully implemented, and **70** are in the process of implementation.

RECOMMENDATIONS:

Sumy Regional State Administration, Regional Military Administration:

Bring temporary accommodation facilities in Sumy region in line with the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930;

Provide additional funding to compensate ICC balance holders for housing and utility costs;

equip institutional care facilities with shelters.

Sumy Regional Territorial Centre for Recruitment and Social Support:

to provide each territorial centre for recruitment and social support, as well as their territorially separate structural units, with a separate isolated room for confidential communication between advocates and persons brought for military medical examination and military registration procedures;

to ensure that advocates have access to the premises of the recruitment and social support centres to provide legal aid to their clients, subject to security restrictions and on the basis of the grounds established by law.

To the Main Department of the National Police in Sumy region:

To conduct an audit of the accessibility of the premises of territorial police units and, based on its results, take measures to eliminate the identified shortcomings.

Local self-government bodies of Sumy region:

to publish on the websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals";

to organise and conduct training for responsible employees of local self-government bodies and subordinate municipal enterprises on compliance with the requirements of the legislation on access to public information and on citizens' appeals;

ensure timely detection, proper identification and registration of children in difficult life circumstances, as well as organisation of their further social support in accordance with the requirements of the law;

Ensure the continuity of children's services in the context of evacuation, in particular by properly documenting the relocation of institutions, organising the preservation of official documentation (including its digitisation and backup) and establishing interagency cooperation to respond to the needs of children and families in a timely manner;

ensure timely and proper consideration of applications, complaints and proposals in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals";

when considering requests for information, to be guided by the requirements of the Law of Ukraine "On Access to Public Information", to avoid unreasonable refusals with reference to restrictions on the constitutional rights of citizens in connection with the legal regime of martial law;

keep the content of official websites and social media pages up to date, including contact information, working hours and reception of citizens.

11.18. Ternopil Region

During the period from 1 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **2,637** appeals from Ternopil region, containing **3,126** reports of human and civil rights violations. Most appeals and reports concerned human rights violations in the following areas: civil rights - **2,209** reports, social rights - **186** reports, economic rights - **138** reports, and children's rights - **79** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	1 161	1 503	2 365	2 637
Reports of violations of rights	1 425	1 776	2 639	3 126

The Ternopil region is located in the western part of Ukraine and does not directly border the aggressor state, but in the context of the ongoing armed aggression of the Russian Federation, it plays an important role as a rear region. Since the beginning of the full-scale invasion, the region has become a place of temporary residence for a significant number of internally displaced persons, which has put additional strain on the social protection, healthcare, education and housing infrastructure. At the same time, the issues of ensuring the rights of internally displaced persons, children, persons with disabilities, the elderly and other vulnerable groups, as well as the proper functioning of social protection, healthcare and education institutions remain relevant.

Under these conditions, systematic activities to monitor the observance of human rights and freedoms and respond to violations are of great importance. The Office of the Ukrainian Parliament Commissioner for Human Rights in Ternopil region monitors the activities of state and local authorities, social protection, healthcare and education institutions, and responds to violations.

In addition, the region has a Human Rights Protection Centre, an open barrier-free space where citizens can receive legal assistance, advice on protecting their rights and file an appeal to the Ombudsman.

Monitoring visits/on-site inspections

In 2025, the team of the Office of the Ukrainian Parliament Commissioner for Human Rights in Ternopil region conducted **110** monitoring visits, including **16** on-site monitoring in various areas of ensuring observance of human and civil rights and freedoms.

In the area of implementation of the functions of the National Preventive Mechanism and observance of human rights in places of detention, **18** scheduled monitoring visits were carried out.

In the area of child protection, **26** monitoring visits were conducted in 2025, including **1** unscheduled monitoring visit.

An important area of work at the regional level is the protection of the rights of persons affected by the armed aggression against Ukraine. In 2025, the Mission's team carried out **20** monitoring visits to places of temporary residence of internally displaced persons, as well as **6** monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine".

In 2025, **30** monitoring visits were conducted to the facilities of the protective structures fund to assess the possibility of using them to shelter the population.

In the area of information rights protection, **10** on-site inspections were carried out to monitor compliance with the right to apply for and receive access to public information and personal data protection.

Educational activities

In order to raise public awareness of the protection of human and civil rights and freedoms, the Representative Office held **35** legal education events in 2025.

Special attention was paid to the issues of ensuring information rights. For this purpose, **7** events were organised for employees of local self-government bodies, state authorities and residents of territorial communities.

In addition, **14** educational events were held for internally displaced persons in their places of temporary residence, aimed at raising legal awareness and access to the mechanisms of rights protection.

The team of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Ternopil region also held **10** on-site receptions of citizens in the territorial communities of the region.

In 2025, the School Ombudsman project was launched in the region, covering **159** general secondary education institutions in Ternopil region.

The main issues addressed by the Ombudsman's office were:

- Protection of children's rights;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the right to life and security under martial law;
- protection of citizens' information rights.

1. Protection of children's rights

As part of monitoring the observance of the rights of orphans, children deprived of parental care and children in difficult life circumstances, **3** institutional care and education institutions; **10** general secondary education institutions; **1** communal orphanage, **1** social support and education institution and **1** centre for social and psychological rehabilitation of children were visited. In order to implement the function of parliamentary control over the observance of children's rights, the Regional Office staff also visited **9** services for children in territorial communities of Ternopil region, as well as made **one** unscheduled monitoring visit to a children's health camp.

The monitoring visits to general secondary education institutions revealed systemic violations of children's rights to a safe, healthy and accessible educational environment. Non-compliance with legal requirements in the area of student catering was found, in particular with regard to the compliance of menus with approved standards, proper selection and storage of daily samples, food labelling, indication of allergens, and provision of food for children with special dietary needs.

In **10** institutions, violations of fire and civil safety requirements were recorded, including the absence or incomplete installation of fire protection systems, inadequate condition of civil protection structures, lack of first aid kits, drinking water supplies, and lack of accessibility for children with disabilities and people with limited mobility.

The monitors also found an insufficient level of medical care for students, including vacancies of medical staff, violations of the storage of medicines, lack of proper medical documentation, and non-compliance with the requirements for preventive medical examinations.

Particular attention was drawn to the lack of information on the protection of children's rights against violence and bullying, the absence or formal maintenance of relevant documentation, information stands, and security incident logs, as well as the unsystematic conduct of preventive work with students, teachers, and parents.

The identified violations indicate the need for local authorities to strengthen control over the observance of children's rights in educational institutions, adequate funding for measures to ensure a safe educational environment, and the introduction of a comprehensive and systematic approach to the implementation of the principle of the best interests of the child.

Based on the results of monitoring visits to children's services in the territorial communities of Ternopil region, an assessment was made of the state of observance of children's rights in terms of organisation of services, staffing, keeping records of children and practices of protecting their personal, property and housing rights.

In general, children's services perform basic functions as defined by law, including keeping records of orphans, children deprived of parental care, children in difficult life circumstances, participating in the activities of guardianship and custody bodies, and implementing family-based forms of education. At the same time, the monitoring showed the existence of systemic violations that negatively affect the principle of the best interests of the child.

In 5 territorial communities (Velykyi Berezovychi, Borshchiv, Velykyi Borkiv, Husiatyn and Ternopil), children's services operate under provisions that do not meet the requirements of the law, in particular, without proper status and clear definition of powers. The number of staff in 4 of the audited communities (Velykyi Berezovychi, Borshchiv, Ternopil and Shumska) does not meet the standards, which leads to an excessive workload and a formal approach to working with children and families.

All the services inspected revealed violations in the initial registration of children and the formation of their personal files, including the absence or formal nature of individual social protection plans, incomplete information on children's property and housing rights, and inadequate documentation of measures taken.

In addition, there were two cases of the formation of one personal file for several children from the same family, which does not meet the requirements of the law (Children's Services of Kremenets and Shumsk City Councils).

The monitors identified systemic shortcomings in ensuring the protection of children's property rights, in particular with regard to control over the collection of alimony, accounting and preservation of property, and the initiation of temporary state aid in case of non-payment of alimony. The activities of interdisciplinary teams in most communities are formal, which reduces the effectiveness of social support for children.

During a monitoring visit to the Service for Children of the Velykyi Borkivtsi Village Council in Ternopil Oblast, representatives of the Ombudsperson's Regional Office in Ternopil Oblast identified systemic violations in the organisation of child protection at the community level.

It was found that the position of the head of the service was vacant, and no other official was assigned to perform his or her duties, which violated the principle of continuity of child protection functions. Inadequate record-keeping and reporting documentation, the formal nature of individual child social protection plans, the lack of proper control over the living conditions of children under guardianship, the inadequate work of the interdisciplinary team and the absence of some mandatory journals and books were also identified. A separate problem was the limited accessibility of the service for children and citizens due to the lack of information about its activities, working hours and the possibility of seeking help. The identified violations created risks of inadequate protection of the rights and best interests of children in the community.

Based on the results of the monitoring visit, the Ombudsman's Regional Office prepared and sent a report to the local government and the Children's Service with recommendations for eliminating the identified violations. The Service for Children of the Ternopil Regional State Administration was informed separately in order to strengthen coordination and control over the activities of the community service.

Based on the results of the response, the community took measures to eliminate the identified violations. The management of children's personal files and records was streamlined, mandatory journals and record books were introduced, the work of an interdisciplinary team was organised with proper documentation of its activities, and a schedule for monitoring the living conditions of children in care was developed. Information transparency of the service was also ensured: information on the official community website was updated, information on contacts and working hours was posted, and information materials for children and citizens were arranged in the service premises.

Monitoring visits to institutional facilities for children (special schools, boarding facilities) revealed violations of children's rights to safe, decent and appropriate living conditions, education, healthcare and development.

In particular, the following were identified: inadequate material and technical support, worn or damaged furniture in residential and educational premises; the need for repair work; insufficient provision of play, correctional and developmental materials necessary for children with special educational needs.

The monitors recorded the inadequate condition of civil protection structures, their lack of first aid kits in accordance with the established requirements, the absence of fire protection systems, emergency exits, and conditions for organising the educational process in shelters in case of prolonged stay of children.

Non-compliance with the principles of barrier-free and inclusive accessibility was found, in particular, the buildings' non-compliance with the requirements of state building codes for accessibility for children with disabilities and people with limited mobility (lack of ramps, inclusive bathrooms, tactile elements, handrails, contrasting markings).

Particular attention was drawn to violations in the area of catering, including non-compliance with the established procedure, failure to take into account the special dietary needs of children, lack of proper menu labelling and information on allergens.

Staffing issues were also identified, including vacancies in medical and teaching positions, which negatively affects the quality of educational, medical and rehabilitation services provided to children.

The violations identified during the monitoring visits indicate the existence of systemic problems in ensuring the rights of children in institutional settings. In such circumstances, the implementation of state policy aimed at preventing the institutionalisation of children and ensuring their right to be brought up in a family environment in accordance with the principle of the best interests of the child is of particular importance.

In this context, it is important to respond in a timely manner to individual cases where there is a risk of a child being placed in an institutional facility due to extraordinary

circumstances. One such example is the case of the father of a minor boy who suffered as a result of a rocket attack on the city of Ternopil.

In 2025, the Regional Office of the Ukrainian Parliament Commissioner for Human Rights in Ternopil region received an appeal from a father to ensure the rights of his minor son, who suffered as a result of the rocket attack on the city of Ternopil on 19 November 2025 by the Russian Federation.

The shelling killed the child's mother and grandmother. The boy sustained serious bodily injuries and suffered significant psychological trauma. The family's home was completely destroyed.

At the time of the tragedy, the child's father was working in one of the European Union countries, where he had left before the start of Russia's full-scale armed aggression against Ukraine to provide for his family.

After the deaths of his mother and grandmother, the child was effectively left without close relatives who could provide proper care and custody. In such circumstances, until the father returned, there was a risk of the child being temporarily placed in an institutional care facility.

In order to ensure the best interests of the child and to exercise his right to be brought up in a family environment, the Regional Office of the Ombudsman in Ternopil region took response measures within the powers granted by law.

Taking into account that the child's father is liable for military service and in case of returning to Ukraine could be subject to mobilisation, which could make it impossible for him to take direct care of the child, the Regional Representative Office of the Ombudsman in Ternopil region informed the Ternopil Regional Territorial Centre for Recruitment and Social Support to take into account the exceptional family circumstances of the father when considering the issue of granting him a deferral from military service during mobilisation.

In addition, the Department of Family, Youth Policy and Child Protection of the Ternopil City Council was provided with recommendations on taking measures to grant the child the status of a child affected by the armed aggression of the Russian Federation.

The recommendations were taken into account, which made it possible to prevent the child's placement in an institutional facility and ensure the exercise of his right to be brought up in a family environment with his father in compliance with the principle of ensuring the best interests of the child.

2. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in special circumstances

In the context of the martial law regime, one of the priorities of the Office of the Ukrainian Parliament Commissioner for Human Rights in Ternopil region is to ensure the observance of the rights of servicemen, veterans, persons liable for military service, as well as family members of servicemen who are in captivity of the aggressor state or went missing under special circumstances.

In 2025, the Regional Office of the Ombudsman in Ternopil region systematically reviewed appeals from servicemen and their families. Based on the results of processing **46** appeals, the applicants were provided with legal explanations and, if necessary, assistance in interacting with the authorised bodies.

The main categories of issues addressed by citizens included: search for missing servicemen, establishing the location of prisoners of war in the territory of the Russian Federation, the procedure and grounds for dismissal from military service during mobilisation, and the delivery of letters to prisoners of war.

On an ongoing basis, the Mission's team was involved in working with the families of the Defenders of Ukraine who are in Russian captivity or are considered missing under special circumstances to provide information, legal and advisory support.

On 1 May 2025, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War (hereinafter - RWG POW) in Ternopil Oblast started its work on the basis of the Human Rights Protection Centre in Ternopil Oblast.

The work of the RWG has become systematic due to the introduction of a weekly schedule of individual reception of citizens and group meetings with family members of servicemen with the participation of specialised specialists. Representatives of military units of the National Guard of Ukraine, the Secretariat of the Ombudsman for persons missing under special circumstances, the Secretariat of the Ukrainian Parliament Commissioner for Human Rights, the Security Service of Ukraine Office in Ternopil region, the Main Department of the National Police in Ternopil region, as well as a representative of the Ternopil Regional State Administration on Veteran Policy, the Ternopil Regional Territorial Recruitment Centre and the Ternopil Regional State Administration on Military Personnel were involved in the work of the RWG.

During the reporting period, the HRWG under the leadership of the representative of the Ombudsman in Ternopil region organised personal reception of citizens and field meetings with families of servicemen in the territorial communities of the region, provided information and legal support of appeals regarding possible violations of the rights of defenders of Ukraine, coordinated the activities of regional units of executive authorities, local self-government bodies and military formations, informed the public about the activities of the HRWG, and

In addition, **7** meetings were organised and held with family members of servicemen in Ternopil and the territorial communities of the region, attended by **912** people. Representatives of the Main Department of the National Police in Ternopil Oblast, the Pension Fund of Ukraine, veterans' support specialists, a representative of the Office of the Commissioner for Persons Missing in Special Circumstances, specialists of the free legal aid system, representatives of the International Committee of the Red Cross in Ukraine, justice, social protection, public authorities and other interested institutions participated in these events.

These activities contributed to raising awareness of the families of servicemen and women about the existing mechanisms for protecting their rights, as well as to establishing interagency cooperation in the search for, return and proper legal support of Ukrainian defenders and members of their families.

During the meetings with the families of servicemen, the most pressing issues raised by the citizens were: the procedure for searching for servicemen missing in action

under special circumstances; the procedure for conducting portrait and molecular genetic examinations; interaction with territorial recruitment and social support centres, the National Police and local authorities; registration of social payments and benefits; obtaining assistance at the level of territorial communities; compliance with information security requirements; and the need to ensure the protection of the rights of the victims of war.

At the same time, in the course of measures taken by the Ombudsman's Office in Ternopil region to protect the rights of servicemen, veterans and their families, problematic issues related to the proper commemoration of the fallen defenders of Ukraine at the level of territorial communities were also identified.

An example of the Mission's response to such a situation is the following.

During one of the working meetings, a citizen filed a complaint with the Ombudsman's representative in Ternopil region against the actions of the management of an educational institution and a local government body related to the dismantling of a memorial plaque installed on the facade of a local school in honour of her deceased son, a participant in the anti-terrorist operation who died in 2016.

According to the applicant, the memorial plaque was solemnly unveiled and consecrated, but after the building's facade was renovated, it was dismantled and subsequently refused to be reinstalled in its original place, despite repeated appeals from the deceased's mother.

The reason for the refusal, according to the applicant, was the position of the responsible officials on the expediency of arranging a single alley of memory on the school grounds for all the deceased servicemen of the community, whose number exceeds 20. The applicant disagreed with this decision and insisted on the restoration of the memorial plaque on the school's facade, seeing the actions of the officials as a violation of her and her family members' right to honour the memory of the fallen defender of Ukraine.

In order to restore the violated rights of the applicant, the representative of the Ombudsman in Ternopil region took response measures, including verification of the circumstances described in the appeal, communication with the local government and the administration of the educational institution, explanations to officials on the need to take into account the position of the family of the fallen serviceman and prevent unilateral decision-making on memorialisation, as well as initiated the settlement of the situation with due regard for the rights and legitimate interests of the family.

As a result of the response measures taken, the issue was resolved positively - the administration of the educational institution granted the applicant's request and restored the memorial plaque to her deceased son on the school's facade.

On an ongoing basis, the Office of the Ukrainian Parliament Commissioner for Human Rights in Ternopil region monitored compliance with the requirements of the law and human rights during mobilisation activities.

In case of detection in the media and social networks of publications that could indicate possible human rights violations by employees of territorial recruitment and social support centres, as well as law enforcement agencies, the Office took immediate response measures. In particular, in 5 of such cases, a proper response was ensured by sending relevant letters to the Ternopil Regional Territorial Recruitment and Social Support Centre, the Ternopil Zonal Department of the Military Law Enforcement Service and the Main Department of the National Police in Ternopil Region to verify the facts and take measures within their competence.

Since September 2025, in the course of the Ombudsperson's Office in Ternopil region's response to unlawful actions that could indicate possible human rights violations by military personnel of territorial recruitment and social support centres, cases of involvement of military personnel of the military unit A4638 in the activities of notification and recruitment of persons liable for military service in the area of the Ternopil Joint City Territorial Recruitment and Social Support Centre have been established.

The prerequisite for this practice was the instruction of the Minister of Defence of Ukraine dated 03.08.2025 No. 4303/ud, which introduced an experiment to involve military personnel of combat units of the Armed Forces of Ukraine in mobilisation notification activities starting in September 2025. Along with the implementation of the experiment, events related to conflict situations during mobilisation activities in public places, crowded places and checkpoints involving servicemen of active military units who are not representatives of territorial recruitment and social support centres resonated in society.

The regional offices of the Ombudsperson, in particular in Ternopil region, received appeals regarding possible violations of the right to personal liberty and security of person guaranteed by Article 29 of the Constitution of Ukraine. At the same time, in accordance with the Procedure for Conscription of Citizens for Military Service during Mobilisation and for a Special Period, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 560 of 16.05.2024, the involvement of military personnel in combat units in such functions is not provided for.

At the same time, the performance of activities by servicemen who have not undergone appropriate psychological adaptation and do not have the necessary qualification skills in their military speciality does not contribute to the quality exercise of powers, causes conflicts with citizens and damages the authority of the Armed Forces of Ukraine under martial law.

In order to respond, the Ombudsman's Office in Ternopil region sent letters to the Main Department of the National Police in Ternopil region and the Ternopil Regional Military-Tactical Centre and JV in two established cases. Based on the results of their consideration, it was reported that the materials on the identified facts were transferred to the State Bureau of Investigation for legal assessment.

The Commissioner also sent a letter to the Minister of Defence of Ukraine. Based on the results of the Ombudsman's response to repeated human rights violations by military personnel and analysis of the progress of the experiment, the Ministry of Defence of Ukraine decided to terminate it.

As of the end of October 2025, the practice of involving military personnel in mobilisation alert activities within the Ternopil region was discontinued.

As part of the media monitoring, a video recording was found showing the use of physical force against a citizen by officials of the territorial recruitment and social support centre with the participation of a National Police officer, with a forced attempt to put him in a civilian vehicle.

These actions could indicate a violation of the right to liberty and security of person guaranteed by Article 29 of the Constitution of Ukraine, and therefore the representative of the Ombudsman in Ternopil region initiated an investigation into the circumstances of the incident. As a result of the response, it was established that the incident occurred during the notification of persons liable for military service by a joint mobile group of the TCC and the JV with the participation of a police officer.

At the same time, internal investigations confirmed that some servicemen had violated the requirements of Article 49 of the Internal Service Statute of the Armed Forces of Ukraine, which led to a negative public outcry and discrediting of mobilisation activities.

As a result of the internal inspections, the military personnel of the TCC and JV and an officer of the National Police were brought to disciplinary responsibility, the materials of the inspection were sent to the specialised defence prosecutor's office, and additional organisational and explanatory measures were taken to prevent similar cases in the future.

3. Protection of the rights of victims of armed aggression against Ukraine

As of the end of December 2025, according to the Unified Information Database of Internally Displaced Persons, **63,269** internally displaced persons were registered in the territorial communities of the region. Of the total number of registered IDPs: **16,109** were children under the age of 18; **2,802** were persons with disabilities; **11,216** were persons of retirement age; and **26,809** were persons of working age. A total of **46,016** IDP families were registered.

In 2025, due to the deteriorating security situation in the southern and eastern regions of Ukraine, a decision was made to conduct a mandatory evacuation of the population to safer areas away from the contact line.

In 2025, Ternopil region received three evacuation trains. Upon arrival, the evacuees were settled in the Velykyi Berezovychi, Lanetskyi, Pochaiivskyi and Trybukhivskyi territorial communities, as well as in a geriatric nursing home and inpatient departments of social service centres.

A free round-the-clock evacuation hotline operates in the region, and there are 53 temporary accommodation places for IDPs included in the List of temporary accommodation places approved by the order of the Head of the Regional Military Administration of 03.11.2023 No. 627/01.02-01.

Based on the results of **20** monitoring visits, **36** recommendations were made to the Ternopil Regional Military Administration and local authorities to ensure the minimum

living conditions for IDPs, of which **10** were implemented, **21** were in progress, and **5** were not implemented.

The most frequently identified violations during the monitoring included: lack of architectural accessibility of the TACs for people with reduced mobility; lack of information stands with useful information for IDPs, contact numbers of the authorities, local self-government, emergency services, NGOs and charitable organisations; need for repair work on some TAC premises; need to replace or repair furniture that was in poor condition.

A separate problem is the cases of non-payment or delay of accommodation allowances to IDPs, with which the Ombudsman's Office actively worked, ensuring verification of payments, finding out the reasons for delays and restoring the rights of internally displaced persons to receive timely state social assistance.

An internally displaced person filed a complaint with the Ombudsman's Regional Office in Ternopil region about non-payment of the IDPs' accommodation allowance for three months of 2025. The applicant reported that she had not actually received any funds on her account, which was confirmed by an official bank statement, but the social protection agency reflected them in its system as paid.

As part of the review of the appeal, the BOC sent correspondence to the social welfare authorities to establish the correctness of the transfer of payment information between the authority and the banking institution and to find out the reasons for the applicant's failure to receive social assistance.

As a result of the correspondence, it was found that the reason for the situation was a technical failure in the software, which resulted in payments being reflected in the system as made, although the funds were not actually transferred to the recipient.

After the intervention of the Ombudsman's office, additional data reconciliation was carried out, payment documents were re-formed and the transfer of the entire amount of assistance due for three months was ensured. As a result, the funds were paid to the applicant in full, albeit with a delay of several months, and her right to receive state social assistance was restored.

4. Protection of the right to life and security under martial law

In 2025, **30** monitoring visits were carried out to civil protection facilities in Ternopil region to assess their suitability for use by the population as simple shelters. Based on the results of the identified violations, **92** recommendations were issued to the balance holders, the Main Department of the State Emergency Service of Ukraine in Ternopil Oblast and the Ternopil Oblast Military Administration, of which **55** were implemented and **37** were in the process of implementation.

The monitoring visits revealed systemic violations of the requirements of the Order of the Ministry of Internal Affairs of Ukraine No. 579 of 9 July 2018 on the maintenance and use of civil protection facilities. In addition, a discrepancy was found between the actual availability and state of readiness of protective structures and the information

reflected in official lists and interactive maps of shelters, which creates risks of misinformation of the population.

Typical violations include:

- Lack of proper information support (absence or improper design of entrance signs indicating responsible persons and contact numbers, insufficient number of information signs and directions to shelters);
- non-compliance with barrier-free accessibility requirements and lack of accessibility for people with limited mobility; lack or inadequate condition of shrapnel protection of window openings;
- Inadequate first aid kits, expired medicines and lack of labelling of their locations;
- lack of adequate supplies of drinking and process water;
- non-functional or inaccessible sanitary facilities;
- absence or malfunction of warning systems for threat announcement and cancellation.

The identified violations, as well as discrepancies between the accounting data and the actual condition of certain facilities, indicate an insufficient level of control over the formation and updating of the fund of protective structures and their readiness for their intended use, which requires strengthening of appropriate measures by balance holders and executive authorities to properly ensure the right of the population to life and safety under martial law.

During the monitoring of the protective structure at one of the pre-school educational institutions in Ternopil, it was found that the facility was deregistered from the civil protection fund, and therefore is not used as a simple shelter.

The reason for the deregistration, according to the administration of the institution, was that the facility was located on the ground floor and could not protect the public from debris, blast waves and other hazards in case of emergency. In the event of an air raid alert, the employees of the pre-school and children attending the kindergarten go down to the shelter of one of the secondary schools in Ternopil, which is located nearby, in accordance with the agreement on the free use of the said shelter.

At the same time, it was established that the said facility was included in the interactive map of protective structures as functioning, which could lead to misinformation of the population and create a real threat to the lives and safety of people who, during the air raid, could try to use this facility as a shelter without receiving proper protection from dangerous emergency factors.

Based on the results of the monitoring, a report was prepared with a recommendation to remove the facility from the list of active civil protection facilities, which was sent to the balance holder, Ternopil Regional State Administration and the Main Department of the State Emergency Service in Ternopil Oblast for implementation. As a result of the measures taken, the facility was removed from the list.

5. Protection of citizens' information rights

The issue of violation of citizens' information rights by state authorities, local governments, institutions and organisations under martial law remains relevant.

In 2025, the Regional Office of the Ombudsman in Ternopil region conducted 7 on-site inspections of official websites of state and local authorities to ensure compliance with the right of citizens to apply and access public information.

The monitoring results showed systemic and recurrent violations, which indicate a formal approach of certain authorities to the implementation of constitutional human rights guarantees. First of all, it concerns the systematic failure to publish mandatory public information provided for in Article 15 of the Law of Ukraine "On Access to Public Information", in particular information on the use of budgetary funds, remuneration of management, vacant positions, as well as contact information of officials and heads of municipal enterprises.

Citizen M. filed a complaint with the Commissioner regarding non-publication of video recordings of meetings of three permanent commissions on the official website of Mykulynets village council in Ternopil region. In order to restore the violated right, a letter was sent to Mykulynets village council demanding to publish the videos and explaining the requirements of the law.

After reviewing the letter, the Ternopil Oblast Commissioner's representative confirmed that the said meetings had taken place, but their video recordings had not been made public, which violated the requirements of the Laws of Ukraine "On Access to Public Information" and "On Local Self-Government in Ukraine".

In this regard, a report on an administrative offence under part one of Article 212³ of the Code of Administrative Offences was drawn up against the head of the Mykulynets village council and sent to court.

The court found the official guilty of committing an administrative offence under Article 212³(1) of the Code of Ukraine on Administrative Offences.

Following the response measures taken, video recordings of meetings of permanent commissions of Mykulynets village council began to be published on the official website in a timely manner, which ensured open access of citizens to information on the activities of the local self-government body and confirmed the effectiveness of the Commissioner's response in the field of protection of the right to information.

Particular attention should be paid to the widespread non-compliance by the authorities with the requirements of the legislation on ensuring the right of citizens to appeal. Systematic cases of absence or non-functioning of telephone hotlines, impossibility of submitting and registering oral appeals, and posting of outdated schedules of personal reception of citizens were identified (Buchach city council, Bilobozhnytsia village council, Mykulynets village council, Pidvolochysk village council). In addition, two cases of creating artificial barriers to the exercise of the right to appeal were identified, in particular, the imposition of illegal requirements for mandatory consent to the processing of personal data or the demand for excessive amounts of personal information, which contradicts the requirements of the Law of Ukraine "On Citizens' Appeals" (Pidvolochysk Village Council, Buchach City Council).

Equally critical is the situation in the area of access to public information, where there is no real possibility of submitting oral information requests, the use of invalid or non-working contact numbers, failure to publish reports on satisfaction of requests, and ignoring the obligation to publish public information in the form of open data (Main Department of the State Service of Ukraine for Food Safety and Consumer Protection in Ternopil Oblast, Buchach City Council).

The conditions of martial law cannot be used as a justification for restricting or narrowing the right to apply for and access to public information, which, in accordance with Articles 22, 40 and 64 of the Constitution of Ukraine, remain guaranteed and binding. The identified violations demonstrate the need to strengthen the responsibility of officials and systematic control over the authorities' compliance with the requirements of the legislation in the field of ensuring the information rights of citizens.

In order to eliminate the identified violations and prevent them in the future, **52** recommendations were provided to state authorities and local self-government bodies based on the results of on-site inspections to bring official websites in line with the requirements of the legislation on ensuring the right to appeal and access to public information.

As of the end of 2025, **38** recommendations have been fully implemented, including the publication of mandatory public information, updating the contact details of responsible officials, restoring the functioning of telephone hotlines, and bringing the schedules of personal reception of citizens into line. At the same time, **14** recommendations are in the process of being implemented.

RECOMMENDATIONS:

To Ternopil Regional State Administration, Regional Military Administration:

Bring the living conditions of internally displaced persons in temporary accommodation in line with the standards set out in the Procedure for the functioning of temporary accommodation for internally displaced persons, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930 "Some issues of functioning of temporary accommodation for internally displaced persons";

Provide organisational and methodological assistance to the services for children of territorial communities on the formation and bringing personal files of orphans and children deprived of parental care in line with the requirements of the current legislation; ensure the arrangement and completion of shelters in the region for the civilian population, as well as to exercise constant control over the free access of citizens to them and their readiness for use.

Local self-government bodies:

publish on the official websites of the territorial communities of the region the information provided for by the laws of Ukraine "On Access to Public Information" (in particular, Article 15) and "On Citizens' Appeals" (in particular, Articles 5 and 22);

ensure personal receptions of citizens;

take measures aimed at improving living conditions in the TACs of the communities, in accordance with the norms defined by the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930;

ensure the realisation of the property rights of orphans and children deprived of parental care by registering citizens who, in accordance with the law, need to improve their housing conditions and properly maintaining apartment records;

to ensure the arrangement and refurbishment of shelters for the civilian population, to exercise constant control over the free access of citizens to them and their readiness for use.

Services for children of territorial communities, regional and district military administrations:

Ensure the realisation of property and housing rights of orphans and children deprived of parental care by timely registration with the housing authorities, preserving the right to use housing, establishing guardianship over the child's property, and taking appropriate control measures over the appointment and recovery of alimony;

ensure that personal files are organised in accordance with the Procedure for keeping personal files of orphans and children deprived of parental care, approved by the Order of the Ministry of Ukraine for Family, Youth and Sports of 18.11.2008 No. 459;

to develop, implement, systematically review and adjust individual social protection plans, ensuring that the planned measures are in line with the child's interests, as well as individual plans for the provision of social services, including plans for social support of the child's family;

to organise the implementation by the guardianship and custody authorities of the Procedure for granting the status of a child affected by hostilities and armed conflicts, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 268 of 05.04.2017.

Ternopil Oblast CCC and JCC:

Ensure acceptance, registration and timely consideration of appeals and inquiries of citizens in all structural units of the CCC and JV in the region;

to take measures to prevent human rights violations during the conscription of citizens for military service during mobilisation for a special period.

The Main Directorate of the State Emergency Service of Ukraine in Ternopil Oblast:

within the limits of its authority, to ensure compliance with the requirements of the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018 during the assessment of objects (buildings, structures, premises) and to provide conclusions on the possibility of their use as the simplest shelters for the population.

11.19. Kharkiv Region

During the period from 01 January 2025 to 31 December 2025, the Ombudsman received **8,261** appeals and **9,986** reports of human and civil rights violations from residents of Kharkiv region. Among the most frequently mentioned human rights violations in the reports were: civil rights - **6,607** reports, social rights - **870** reports, economic rights - **593** reports, and children's rights - **210** reports.

The number of	2022	2023	2024	2025
Appeals of of citizens	4 847	6 686	7 273	8 261
Notifications of violations of rights	4 867	7 888	8 135	9 986

The geographical location of the Kharkiv region, given its close proximity to the border with the aggressor state, causes an increased level of humanitarian and security risks resulting from the armed aggression of the Russian Federation. The systematic shelling of civilian infrastructure, intense hostilities in the Kupiansk, Vovchansk, Borivsk and Lipetsk directions, as well as the ongoing occupation of the territorial communities of Chuhuiv, Izyum, Kupiansk and Kharkiv districts, created conditions for large-scale and systematic violations of human and civil rights. These circumstances have led to violations of a number of fundamental rights, including the right to life, security, housing, healthcare, education and access to justice, and have increased the vulnerability of certain social groups. Under these conditions, combating and preventing human rights violations requires state authorities, local governments and civil society institutions to implement comprehensive, cross-sectoral and human rights-oriented solutions.

Monitoring visits/on-site inspections

An important area of work is monitoring the observance of human and civil rights and freedoms by state authorities, local self-government bodies, their officials and officers, as well as managers and officials of enterprises, institutions and organisations, regardless of ownership. In 2025, the team of the Representative Office carried out **173** monitoring visits and **12** on-site inspections in various areas of ensuring the observance of human and civil rights and freedoms.

In particular, **24** visits were made to places of detention in the area of implementation of the functions of the national preventive mechanism. In 2025, **56** monitoring visits were carried out in the area of protection of children's rights. In order to determine the level of equal rights and freedoms, in particular the accessibility of social infrastructure facilities in Kharkiv region, the team of the Representative Office conducted **2** monitoring visits to healthcare facilities in Kharkiv and Kharkiv region. In the field of protection of the rights of persons affected by the armed aggression against Ukraine, the team of the Mission conducted **80** monitoring visits, during which they visited **22** places of temporary residence of internally displaced persons, **35** civil protection facilities, **2** transit centres, **1** modular town, and **20** monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine". In addition, **12** on-site monitoring visits were carried out in the area of information rights protection and **11** monitoring observations of compliance with procedural guarantees and fair trial standards.

Educational activities

During the reporting period, the Office organised and participated in **107** awareness-raising events. Among them, **11** events were held for more than **120** children in Kharkiv region to raise awareness of child rights protection and familiarise them with the powers and activities of the Ombudsman.

The main issues addressed by the Ombudsperson's Office

- protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- the right to life and security;
- protection of children's rights;
- protection of information rights of citizens;
- protection of human rights in places of detention.

1. Protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances

In 2025, the Mission considered **5** appeals on the observance of the rights of servicemen and women. The analysis of the received appeals demonstrates the systematic nature of problems in the implementation of social and legal guarantees for the Defenders of Ukraine. The most common are cases of delayed procedures for granting combatant status, untimely accrual and payment of social benefits provided for by law, as well as

improper performance of duties by certain authorities in the field of social security for servicemen.

The identified violations are systemic in nature and require strengthening of interagency coordination, improvement of administrative procedures and effective parliamentary control over the activities of government agencies.

A separate area of the Mission's activity concerned the protection of the rights of family members of servicemen who are in captivity of the aggressor state or went missing under special circumstances. In order to ensure the exercise of the right of such persons to receive reliable information, social protection, legal assistance and proper interaction with public authorities, in cooperation with the Coordination Headquarters for the Treatment of Prisoners of War, the Commissioner for Persons Missing in Special Circumstances, representatives of the International Committee of the Red Cross in Ukraine and public authorities, **25** meetings were held with family members of servicemen of Kharkiv and territorial communities of Kharkiv region, attended by

In addition, the representative office carried out comprehensive work aimed at ensuring the observance of the rights of veterans, members of their families and families of fallen defenders of Ukraine. As part of these activities, the Mission monitored the fulfilment by public authorities of their obligations to formulate and implement the state veterans' policy, in particular, to ensure the principle of veterans' participation in decision-making processes. An important element of this work was **the promotion of the creation of a veterans' space** pursuant to the order of the Prime Minister of Ukraine dated 28.08.2024 No. 27565/1/1-24 on the implementation of the provisions of the Presidential Decree. The practical result of this initiative was the functioning of the Kharkiv Regional Veterans' Centre, a municipal institution "Veterans' Space "Side by Side" of the Kharkiv Regional Council. The centre's activities are aimed at providing comprehensive support to female and male veterans and their families, including by providing access to new knowledge, promoting effective social reintegration and comprehensive adaptation to civilian life.

There are also systemic problems with timely and proper responses by territorial recruitment and social support centres to citizens' appeals, requests for information, and response letters from the Ombudsman's Office.

The appeals sent to the TCCs and JVs, despite the confirmation of their delivery, are often left without consideration or without a response within the time limits established by law. In a number of cases, responses are provided only after repeated reminders, repeated appeals or intervention by higher military authorities. In 2025, the Ombudsman sent **7** such appeals.

Of particular note are the cases of ignoring **2** letters delivered on purpose, as well as the lack of response to the identified violations by the regional TCC and JV, whose powers include coordination and control of the activities of subordinate district TCC and JV.

Citizen D. appealed to the Ombudsman for protection of his right to complain about the inaction of the district TCC and JV. The applicant reported no response to

his written appeal sent by post, despite the confirmed status of the dispatch as "delivered by power of attorney".

In order to clarify the circumstances of the case, the Commissioner's Secretariat sent a letter to the district TCC and JV. Due to the lack of feedback, the said letter with attachments was delivered to the institution on purpose, but no proper response was received again. The next step of the Secretariat was to appeal to the Kharkiv Regional TEC and JV with a request to take measures to eliminate the violations by the District TEC and JV. Due to the continued ignoring of the requests at the level of the regional and district TECs and JVs, the Ombudsman's Office appealed to the General Staff of the Armed Forces of Ukraine. Only after this intervention the applicant and the Secretariat received the necessary answers. Thus, thanks to the measures taken by the Commissioner, the violated right of the citizen to receive information upon request was restored.

A common problem in the area of interaction between citizens and military authorities, in particular military units, is the untimely provision of responses to appeals and requests for information, or in some cases, their ignoring.

In practice, applicants, including family members of deceased servicemen, have to wait for a long time to receive the documents necessary to exercise their rights guaranteed by the state, such as social benefits, pensions, status as a family member of the deceased, inheritance rights, etc. Even if the established procedure for submitting requests for information through the TCC and JV or using electronic document management systems is followed, military units often fail to meet the deadlines for processing appeals and requests for information provided for by the applicable law. This leads to a violation of the right of citizens to timely information and effective administrative protection, and the restoration of violated rights is often possible only after the intervention of controlling or supervisory authorities.

In January 2025, the applicant submitted a request to the military unit through the department of the district CCC and JV to provide documents regarding her husband, who died while performing his duties in the combat zone. Despite the fact that in February and March 2025, the department of the district CCC and JV repeatedly sent requests to the military unit through the electronic document management system (hereinafter - EDMS), as of April 2025, no response was received. In view of the above, the applicant turned to the Ombudsman for protection of her rights.

Due to the Commissioner's opening of proceedings and sending a letter to the General Staff of the Armed Forces of Ukraine, the applicant's rights were restored - in May 2025, she finally received the requested documents.

In April, the Ombudsman was approached by the applicant, who reported that in January, through the district CCC and JV, she had filed an application with the military unit for payment of financial support for her husband, who had gone missing. Despite the fact that the district CCC and JV sent the application, together with documents certified in accordance with the procedure established by law, to the military unit by means of the EDMS, the applicant did not receive a response, and the payment of financial support was not made.

The Ombudsman's Secretariat established the fact that the military unit ignored numerous letters from the district MCC and JV. In order to restore the applicant's right to proper consideration of her appeal, the Ombudsman's Secretariat sent letters to the General Staff of the Armed Forces of Ukraine and the district CMC and JV. As a result of the Ombudsman's intervention, the consideration of the issue was accelerated and the applicant received a response to her application. In May, the specialised commission of the military unit made a positive decision to accrue and pay the due financial support.

Also, based on the results of media monitoring, the team of the Mission identified more than **10** cases when unidentified persons in uniform used physical force against citizens and caused material damage during detention attempts. As a matter of urgency, the Ombudsman's representative in Kharkiv region sent relevant letters to the Main Department of the National Police in Kharkiv region, Kharkiv regional TCC and JV, Kharkiv Zonal Department of the Military Law Enforcement Service to fully clarify all the circumstances of these events and ensure control over the progress of the cases.

The audit revealed that the unidentified persons were officials of the TCC and JV who exceeded the limits of their authority and violated the applicable law. Based on the results of the measures taken by the representative of the Commissioner in Kharkiv region, **8** internal investigations were initiated, as a result of which **6** perpetrators were brought to disciplinary responsibility. In addition, pre-trial investigations were initiated in a number of cases.

During the monitoring of the media, a video was found in which the description stated that the person in uniform was an employee of the TCC and JV and that the incident took place in Kharkiv. The video shows a person in uniform using physical force against a cyclist. The video then shows two minibuses arriving at the scene, from which other men in uniforms got out. The man was detained and placed in one of the vehicles, after which he was forcibly moved in an unknown direction.

Taking into account the above, the Commissioner's Secretariat sent a letter to the Kharkiv Regional TCC and JV. An internal investigation was ordered, following which the guilty person was brought to disciplinary responsibility in the form of a strict reprimand.

2. Protection of the rights of victims of armed aggression against Ukraine

Kharkiv region, despite constant shelling and proximity to the frontline, continues to play a critical role in ensuring the livelihoods and support of internally displaced persons. According to the Kharkiv Regional Military Administration, there are **81** registered **temporary accommodation centres** in the region, which have become a refuge for thousands of people who have lost their homes. These places of temporary residence are located in different territorial communities of the region, with a total population of **7,984** people, including **980** children and **611** people with reduced mobility.

In 2025, the staff of the Ombudsman's Office in Kharkiv region conducted monitoring visits to **22** temporary accommodation facilities located in Kharkiv, Valky, Zmiiv, Chuhuiv, Slobozhanska, Berestynska city and Kegychivska settlement communities.

Based on the results of the monitoring visits to the places of temporary residence in Kharkiv region and the preparation of reports with recommendations, the Ombudsman's Office sent response acts - letters to the Kharkiv Regional Military Administration and the territorial communities of Kharkiv region, where the places of temporary residence are located. Thus, the Ombudsman's Office provided **92** recommendations to the Kharkiv Regional Military Administration, communities, and balance holders of the premises to improve the observance of the rights of internally displaced persons in places of temporary residence. Out of **92** recommendations: **16 have been implemented**, **49** are in the process of implementation, and **27 have not been implemented**.

During the monitoring visits to the places of temporary residence, the staff of the Ombudsman's Office in Kharkiv region paid attention to the state of observance of the rights of internally displaced persons living there. This involves a comprehensive study of a number of issues, in particular: the level of compliance with the minimum criteria for providing temporary accommodation in accordance with the Procedure for the functioning of temporary accommodation for internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine "Some issues of functioning of temporary accommodation for internally displaced persons" of 1 September 2023 No. 930 (hereinafter - the Procedure), the level of awareness of internally displaced persons about available services and support programmes in the communities of residence, and their Thus, according to the results of monitoring visits to places of temporary residence in 2025, the following systemic problems were identified, in particular

- insufficient provision of household appliances (washing machines, dryers, refrigerators, boilers, gas and electric stoves, microwaves, small appliances) or the need for their repair and connection (in 12 monitoring sites);
- inaccessibility of residential and functional premises of temporary accommodation (lack of ramps, handrails at entrances and stairs, lack of bathrooms and shower rooms) for people with limited mobility (in 11 monitoring sites);
- insufficient provision of humanitarian aid (winter and children's clothing, footwear, diapers for children, hygiene products, food packages, stationery) to residents of temporary accommodation (in 8 monitoring sites);
- the need to carry out repair work in living rooms, common areas, bathrooms, roof repairs, drainage systems or replace damaged windows (in 7 monitoring sites).

It is worth noting that the issue of ensuring barrier-free access for people with reduced mobility in places of temporary residence is one of the main issues in monitoring the observance of the rights of persons affected by the armed aggression against Ukraine. Based on the results of monitoring visits to **22** temporary accommodation facilities, it was found that only **1** of them (based at the Centre for Tourism, Local History and Excursions for Schoolchildren of the Valky City Council of Bohodukhiv District, Kharkiv Region) meets the criteria for barrier-free premises.

Work is underway to adapt the premises of temporary accommodation facilities at the following sites

- a temporary accommodation facility based at the Regional Centre for Vocational Education of Railway Transport and Agricultural Service (Kegychivka village, Berestyn district). In particular, with the assistance of the charitable sector, three living quarters for six people and a kitchen adapted for the needs of people with limited mobility, as well as a separate entrance and exit with an automatic lift, were provided for the resettlement of residents with musculoskeletal disorders;

- a place of temporary residence on the basis of dormitory No. 2 of the V.I. Vernadsky Kharkiv State Vocational College. A ramp for people with reduced mobility was installed in the above-mentioned ICC and a lift was put into operation;

- a place of temporary residence on the basis of the State Biotechnological University (Dokuchaevske village, Kharkiv district). It was established that, based on the results of the repeated monitoring of this temporary residence, the Commissioner's recommendation to equip accessibility facilities was implemented: with the assistance of the charitable sector, a ramp for access and descent for people with reduced mobility living on the ground floor was installed in 2024, and showers and toilets for people with reduced mobility on the ground floor were equipped;

- a temporary residence on the basis of the Zmiiv Professional Energy Lyceum (Slobozhanske, Chuhuiv district). In 2025, work is underway to equip a ramp in the rear wing of the temporary accommodation facility to access the premises on the ground floor.

A separate problem in Kharkiv region is the overload of geriatric institutions due to a significant increase in the number of evacuees in need of constant care. The actual number of residents significantly exceeds the design capacity of the institutions, which leads to a violation of the established state standards for space per person, deterioration of living conditions and the inability to provide an adequate safe and dignified environment. An additional complication is the placement of people evacuated from psychoneurological institutions in geriatric facilities that are not designed to provide specialised care for these categories of people. The medical and social staff of geriatric institutions usually do not have the necessary professional training to work with people with mental and behavioural disorders, which negatively affects the quality of services and the observance of the rights of the wards. As a result of these circumstances, geriatric institutions are forced to operate outside their intended purpose, which creates risks of violating the rights of older people and people with disabilities to proper care, safety and decent living conditions.

In addition to material and domestic problems, a significant barrier to the realisation of the rights of internally displaced persons is the lack of proper legal registration of their residence. During the monitoring visit, it was found that in the

Zmiivska community, IDPs were accommodated without concluding contracts with the actual owner of the building or on the basis of documents that do not provide for the right to use the housing (for example, contracts for the provision of social services). This situation is contrary to the requirements of the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of temporary accommodation for internally displaced persons" and leaves internally displaced persons in a state of legal uncertainty, depriving them of basic guarantees of protection against unjustified eviction and the right to a stable place of residence in the community.

During a monitoring visit to the place of temporary residence at the municipal enterprise "Zmiiv Production Department of Housing and Communal Services" of the Zmiiv City Council of Chuhuiv District, Kharkiv Region (hereinafter - Municipal Enterprise "Zmiiv VUZHKH") to monitor the observance of the rights of internally displaced persons, a violation was found: internally displaced persons were living without proper registration of their rights to use residential premises.

It was found out that internally displaced persons and the municipal institution "Centre for the Provision of Social Services" of the Zmiiv City Council of Chuhuiv District, Kharkiv Region, had concluded agreements on inpatient care, while no agreements had been concluded with the actual balance holder, ME "Zmiivske VUZHKH". This led to the fact that internally displaced persons were in a legal vacuum, without the status of housing users, which contradicted the requirements of the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023 "Some issues of functioning of places of temporary residence of internally displaced persons" and created risks to their legal protection.

After sending a report with recommendations to the Zmiiv City Council and Kharkiv Regional Military Administration, the situation was brought into compliance with the law. As part of the response:

- All internally displaced persons signed accommodation contracts in accordance with the requirements of Resolution No. 930;*
- legal certainty and stability of the IDPs' stay in the facility was ensured, which guarantees them protection from unjustified eviction.*

Bringing contractual relations in line with the law allowed for the transformation of the actual stay of internally displaced persons in the facility into a legally enforceable right to housing, providing IDPs with adequate legal protection against unjustified eviction and guarantees of stable accommodation.

3. Right to life and security

Ensuring the right to security of citizens is an absolute priority for the Mission's activities in the region, especially given the constant threat of shelling and drone strikes by the Russian Federation.

To achieve this goal, in 2025, the Ombudsman's Office staff carried out **35** monitoring visits to the facilities of the protective structures fund to assess their use as shelters for the population, including **34** scheduled and **1** unscheduled visit. Of these, **33**

were simple shelters and **2 were** radiation shelters. A total of **107** recommendations were provided as a result of the monitoring visits, of which **37** were implemented, **51** were in progress, and **19** were not implemented.

During the monitoring visits to the objects of the Civil Protection Facilities Fund, the Mission's staff pays special attention to compliance with the Requirements for the Maintenance, Arrangement and Operation of the Civil Protection Facilities Fund, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 9 July 2018, namely their marking, accessibility, electricity supply, ventilation system, compliance with temperature and humidity, placement of technical and drinking water, first aid equipment, rescue tools, etc.

The following systemic problems were identified during monitoring visits to the facilities of the Shelter Fund in 2025

- Inaccessibility of the protective structures fund for people with disabilities and other low-mobility groups (8 objects of the protective structures fund);
- failure to provide the simplest shelters with drinking water (16 objects of the fund of protective structures);
- failure to provide the simplest shelters with technical water (11 objects of the fund of protective structures);
- lack of fire extinguishing equipment at the facilities of the protective structures fund (8 facilities of the protective structures fund).

One of the most acute problems identified during the monitoring visits was the lack of equipped shelters at the addresses listed on official web portals. This misleads citizens and other persons, creating a real threat of harm to their lives and health as a result of emergencies.

For example, during one of the monitoring visits, it was found that the entrance to the basement of the shelter is accessible only to residents of an apartment building due to the design features of the building. The entrance to the basement is via stairs from the building's entrance. There are no signs of the shelter outside or inside the building; the metal partition to the basement only has an inscription on it stating that the keys to the basement are kept by residents of certain apartments. The door is locked. During the conversation with the residents of these apartments, it was established that the basement is not used as a protective structure, instead, the residents of the building use a shelter at another address.

During a monitoring visit to a healthcare facility in Kharkiv, it was found that the simplest shelter did not meet inclusivity standards. The entrance to the premises did not provide free access for persons with disabilities and other groups with limited mobility, which effectively deprived them of their right to protection during shelling.

As a result of a letter sent by the Ombudsman's Office, the balance holder equipped the entrance with a folding ramp. This allowed to eliminate violations of the legislation on barrier-free access and ensure equal access to the security space for all categories of citizens.

The described problems indicate the insufficiency of measures taken by local governments and the regional military administration to register, maintain and bring shelters into readiness for use for their functional purposes. In view of the identified violations, the issue of proper arrangement of shelters is a priority and is under constant control of the Ombudsman and the representative in the region.

4. Protection of children's rights

Ensuring the observance of the constitutional rights and freedoms of children is a key priority in the activities of the Office. In order to comprehensively assess the situation and effectively respond to the challenges of wartime, **56** monitoring visits were carried out in Kharkiv region in 2025, including **1** targeted visit at the request of citizens.

To achieve this goal, **21** children's services, **19** social service providers in Kharkiv region, the Kharkiv Pre-trial Detention Centre, **5** healthcare facilities and **9** educational institutions in two communities of Kharkiv region were visited. The visits resulted in **377** recommendations, of which: **176** were implemented, **189** were in the process of implementation, and **12** were not implemented.

In the context of ensuring adequate legal protection by the state for orphans and children deprived of parental care, the priority area of work remains addressing the issue of violations of children's housing rights.

During monitoring visits to communities in the Kharkiv region, non-compliance with legal requirements by children's services to register children who have reached the age of 16 in a timely manner was identified. Based on the results of the visits, the Ombudsman's response acts were sent to the respective communities with a request to eliminate the identified violations and letters of explanation on compliance with the law. Despite the communities' reports on the restoration of children's rights, an analysis of the data provided by 56 territorial communities in Kharkiv region on the implementation of the recommendations confirmed that only 41 of the 56 actually complied with the requirements. The work to fully eliminate violations in other communities is ongoing.

A repeat monitoring visit to the Service for Children of the Executive Committee of the Zlatopil City Council of Kharkiv Oblast revealed ongoing violations of the housing rights of orphans and children deprived of parental care. Despite the previously submitted comments, the Service for Children of the Executive Committee of the Zlatopil City Council of Kharkiv Oblast did not take measures to register children for housing in a timely manner, which is a gross violation of their housing rights.

After the Ombudsman's submission was sent to the head of the community, the situation was remedied: the documents for registration of 4 children under the age of 16 were prepared and submitted. Employees of the above-mentioned service were brought to disciplinary responsibility for their inaction and disregard for the legitimate interests of children.

The elimination of official inaction allowed for the actual restoration of the right of four teenagers to housing and the establishment of personal responsibility of officials for non-compliance with the legitimate interests of the child.

The problem of understaffing of children's services with the required number of employees remains critical. According to information provided by the Kharkiv Regional Military Administration, the staffing level of children's services in Kharkiv region is **83 per cent**.

In addition to staffing levels, social service providers face the issue of staff having the necessary qualifications and expertise in their areas of expertise. This indicates a systemic problem in the quality and quantity of work carried out by both employees of children's services and social service providers, which directly affects the level of child protection in the communities of Kharkiv region.

This problem is particularly acute in the 3 communities visited, which were relocated from the combat zones, namely Kupiansk, Lipetsk and Vovchansk. Thus, during communication with employees of social service centres, it was revealed that the staff lacked the necessary professional training and qualifications. This raises the problem of resuming social support for evacuated children and children in difficult life circumstances. At the same time, the work of children's services in relocated communities is complicated by the need to restore children's personal files and to find their current location, which creates significant problems in the protection of children's rights in the respective communities.

During the monitoring of the children's service in one of the TACs, a child deprived of parental care was found to have been in an institution for a long time without proper registration. Information about the child was not entered into the regional database, which effectively blocked his right to adoption.

In order to immediately remedy the violation, a letter of explanation was sent to the Vovchansk City Military Administration, which emphasised the importance of ensuring the child's right to a family. As a result, within two days, the child's information was entered into the relevant database, and the foster parents and adoptive parents were informed about the possibility of placing the child in a family. Thus, thanks to the intervention of the office, the child's right to a family was restored.

A serious problem is the uncontrolled return of families with children to the active hostilities and frontline communities in the region. According to media reports⁴⁸, cases of such returns have been recorded in the Kharkiv region.

According to information provided by the Kupiansk District Military Administration of the Kharkiv Region, in 2025, 28 families (40 children) returned unauthorisedly to settlements in the Kupiansk District where compulsory evacuation of children was introduced.

To this day, the issue of the algorithm of actions when deciding on the announcement of a mandatory evacuation for the population in the communities remains unresolved. This leads to numerous cases when, despite the lack of basic communications (gas, electricity and heating) and constant shelling, parents refuse to evacuate their children to safer conditions.

⁴⁸ <https://2day.kh.ua/ua/kharkow/dity-na-fronti-chomu-batky-zalyshayut-ditey-u-kill-zoni-na-kharkivshchyni>

With regard to the level of social services, there is a problem with their quality and compliance with the law. The facts of non-compliance with the requirements of the State Standard of Social Support for Families (Persons) in Difficult Life Circumstances, approved by the Order of the Ministry of Social Policy of Ukraine of 31.03.2016 No. 318 and the State Standard of Social Support for Families with Orphans and Children Deprived of Parental Care, approved by the Order of the Ministry of Social Policy of Ukraine of 11.08.2017 No. 1307, were found in almost all the specialised centres (centres for the provision of social services, social service centres) visited.

The issue of social support for children who have experienced and/or witnessed domestic violence should be highlighted separately. It has been established that communities in Kharkiv region do not take all appropriate and comprehensive measures to register and provide social support to this category of children.

The systemic problem also concerns the lack of child-centredness in the provision of social support to families with a history of domestic violence. The focus of social service provision is mostly on adults and hardly addresses the causes and consequences of family conflicts, limiting itself to solving problems at the household level.

In addition, the analysis of information from **56** territorial communities in Kharkiv region shows that only **31** of them have implemented the recommendation to ensure the availability of specialists who have received appropriate training and implement programmes for offenders.

During a visit to the municipal institution "Centre for the Provision of Social Services" of the Malodanylivka Village Council of the Kharkiv District of the Kharkiv Region, a violation was found: a family of citizen K. with children was identified, in which, according to the results of the family needs assessment, the fact of domestic violence was confirmed. During the monitoring, it was also found that social support for this family was not provided. The family's refusal to receive services resulted in the failure to take appropriate measures to protect children from violence, despite the confirmed risks to their lives and health.

After sending a report with recommendations to the head of the community, the social service centre took the family under social support. Comprehensive work of parents and children with a psychologist was ensured, which helped to protect the rights and interests of the child.

Based on the results of monitoring visits in 2025, the office identified a systemic problem of lack of effective coordination between children's services and other stakeholders who became aware of children without parental care.

At the end of 2025, during a visit to the place of temporary residence of internally displaced persons, an orphaned child was found who was on full state support in an educational institution. It was established that the Service for Children of the territorial community had not received any reports about this child, and he was not registered as an orphan or child deprived of parental care who had arrived from other territories. The fact of the child's stay in the institution became known to the service staff only after being informed by the Ombudsman's Secretariat. The lack of proper information exchange between protection actors in the community led to the child remaining outside the legal register for a long time.

As a result of sending the report with recommendations to the head of the community and the relevant children's service, the Ombudsperson's Office was informed that the service would strengthen control over the timely and accurate entry of information about children of the relevant registration category into the relevant journals, as well as work to improve the interaction between local government units, police and the local centre for social services.

A critical issue that needs to be addressed immediately in healthcare facilities is the systematic failure to meet daily norms and diversity of nutrition for children who have been delivered. This is a direct violation of their constitutional right to an adequate standard of living necessary for full physical development.

During a monitoring visit to the municipal non-profit enterprise "City Children's Clinical Hospital No. 24" of the Kharkiv City Council, a violation was established: the nutrition of children did not meet the established standards per patient per day. This directly violated the child's right to an adequate standard of living necessary for full development.

Based on the results of the report sent to the Kharkiv City Council with the relevant recommendations, a revision of the budget for food expenditures was initiated and the weekly ration of baby food was changed. The measures taken made it possible to promptly ensure the right of the child to a standard of living adequate for physical, intellectual, moral, cultural, spiritual and social development, including adequate nutrition. The child's right to adequate nutrition in a healthcare facility was restored.

A separate response of the Ombudsperson's Office and the regional office was required in the case of an individual violation of a child's rights. As a result of the prompt response to the parents' appeal to the Ombudsman, the child's right to medical care was successfully restored.

The Ombudsman was approached by the child's parents regarding the fact that a medical institution refused to admit and provide the necessary treatment to the child. According to the information provided in the appeal, the medical institution refused to admit the child and provide the necessary treatment, justifying its decision by the absence of a correctly filled referral.

After promptly clarifying the circumstances of the case, the Ombudsperson's Office appealed to the Kharkiv City Council to take urgent measures aimed at restoring the child's right to life and health protection.

As a result of the Ombudsperson's response, the Kharkiv City Council reported that a family doctor had established contact with the child's family, and a specialist doctor had consulted the child, following which the child was sent for inpatient treatment at a healthcare facility. Thus, the child's right to healthcare was restored.

In addition, in 2025, special attention was paid to the state of observance of children's rights to a safe educational environment during education under martial law. To this end, **9** monitoring visits to educational institutions were carried out.

Currently, some educational institutions in the Kharkiv region that have received permission to conduct the educational process in a full-time/mixed form are ensuring the continuity of the educational process under martial law by implementing security and organisational measures, including conducting classes in shelters, underground schools and metro schools. Some educational institutions have introduced a shift-based learning regime due to the use of one building by several institutions, which demonstrates the ability of administrations to adapt to difficult conditions.

Based on the results of monitoring visits, the following most common violations of children's rights were identified:

- *The right to life and healthcare*; in most educational institutions, systemic violations in the organisation of medical care were identified, including the provision of medical support without proper licensing, the provision of medicines to students without written parental consent, the presence of expired medicines and improper storage of first aid kits. In addition, in all the visited institutions, there was a lack of stocks of long-term storage products, and in some of them, there was an insufficient supply of drinking water in protective structures;

- *the right to accessibility*, in all visited educational institutions there were violations of accessibility requirements, in particular the lack of tactile and visual accessibility elements, contrasting labelling, anti-slip coating, as well as insufficient staircases and sanitary facilities for people with limited mobility;

- *the right of the child to adequate and safe nutrition*, revealed systemic violations in the organisation of meals, including the lack of proper registration and provision of children with special dietary needs, unified meals without regard to age and health status, as well as the complete absence of meals for students of the second shift in some institutions;

- *social and pedagogical patronage and psychological support*, the monitoring showed a staff shortage and formal nature of the activities of psychological and social and pedagogical services, lack of systematic documentation and preventive work with children from socially vulnerable categories.

The Ombudsperson sent **5** submissions to the state authorities, local self-government bodies, institutions, organisations and enterprises on the facts of violations of children's rights by the state authorities, local self-government bodies, institutions,

organisations and enterprises, and drew up **1** report on administrative offence under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences.

5. Protection of human rights in places of detention

The team of the regional office conducted **24** visits to places of detention, including: **5** - to privately owned institutions; **5** - to courts; **4** - to boarding houses, boarding schools, inpatient care units; **10** - to police. The visits resulted in **173** recommendations, of which **45** were implemented, **15** were partially implemented, **95** were under implementation and **18** were not implemented.

Visits to privately owned institutions revealed violations of human rights and freedoms, including systemic violations:

- *The right to life and security.* In all 5 institutions, there are no or inadequately equipped protective structures (shelters) or any equipped basements, which makes it impossible to ensure the safe stay of the wards and staff during air raids or shelling;

- *the right to liberty and security of person.* Not all clients provide informed consent to placement and stay in residential care facilities; care contracts are concluded with relatives of legally capable persons without confirmation of their authority to represent the rights and interests of clients, and the administration of residential care facilities does not require relevant documents, which violates the right to independent decision-making;

residents are not allowed to go outside the facility, except when accompanied by the staff of the facility;

- *the rights of older people to receive inpatient and palliative care services.* Individual plans for the provision of social services of inpatient care are not drawn up on the basis of a comprehensive identification and assessment of the individual needs of recipients of social services;

- *the right to free personal development and leisure.* The organisation of leisure activities for residents of residential care facilities is extremely limited and is mainly limited to watching television programmes or listening to radio broadcasts;

- *the right to accessibility.* In particular, the premises of institutions are not fully adapted for persons with disabilities and low mobility groups: living rooms are not equipped with call buttons for staff, there are no handrails in corridors, on ramps and in bathrooms, and institutions where residents live above the first floor are not equipped with lifts.

During **10** monitoring visits to police stations in the Kharkiv region, systemic violations of the right to protection from torture or other cruel, inhuman or degrading treatment or punishment were recorded. In particular, in the premises of **3** police bodies, there are no rooms for detainees or they do not actually function due to their non-compliance with the requirements of national legislation and international standards. Such conditions do not provide minimum guarantees of security, dignity and humane treatment of detainees.

In addition, 7 out of 10 visited structural units of the police lack sanitary facilities adapted for use by persons with disabilities and other low-mobility groups. As a result,

these persons are effectively deprived of the opportunity to satisfy their natural needs and take sanitary and hygienic measures during their stay in the institutions, which is a violation of their rights to inclusiveness (equality), respect for honour and dignity, and the right to health care.

During the monitoring visits to 5 courts in Kharkiv region, systemic human rights violations were identified, including the rights of persons in custody and those involved in criminal proceedings:

- *violations of the right to protection from torture and to decent conditions of detention.* It has been established that the number of cells for accused (defendants) and convicted persons in courts does not meet the standard of at least three cells for each courtroom for the consideration of criminal cases, which in turn may violate the requirements for separate accommodation of men and women, adults and minors, as well as isolated detention of persons who are prohibited from communicating with each other;

- *violation of the right to security of others.* The routes of conveying accused (defendants) and convicts to courtrooms for consideration of criminal cases are not isolated, convoys are carried out through corridors, stairs or elevators accessible to unauthorised persons, which poses a threat to the safety of court staff, participants in the trial and court visitors;

due to the absence of a separate sanitary facility for defendants (convicts) in some courts, the latter use the toilet room for visitors, which creates additional risks of prohibited items getting to defendants (convicts);

- *violation of the right to professional legal assistance.* In **3** courts, there are no specially equipped rooms for the confidential work of lawyers with defendants and convicts. This situation makes it impossible to properly exercise the right to defence and confidential communication with a defence counsel.

6. Protection of information rights of citizens

In the context of the martial law regime, the problem of observance of information rights of people and citizens by state authorities, local self-government bodies, enterprises, institutions and organisations remains relevant. The Ombudsman's monitoring activities demonstrate systemic violations of the right to access public information and the right to appeal.

In 2025, the Ombudsman's Office conducted **12** on-site inspections of observance of human and civil rights to appeal and information by public authorities and territorial communities to assess the state of ensuring the right of citizens to appeal and access to public information. The inspections resulted in **105** recommendations, of which: **38** have been implemented, **48** are in the process of implementation, and **19** have not been implemented. In addition, it was found that the violations are persistent and repetitive.

In particular, cases of partial or complete absence of information on adopted decisions and regulations in the public domain, posting of outdated or inactive contact details and methods of submitting appeals and requests for information, lack of reporting on the consideration of requests for public information on websites, and failure to specify the procedure for personal reception of citizens by officials were identified.

These violations make it impossible to fully exercise the rights of access to public information and to appeal guaranteed by the Constitution of Ukraine and laws of Ukraine, reduce the level of openness and accountability of public authorities, and require proper response from the relevant authorities to eliminate them and prevent them in the future.

Journalists of the Media-Zmiyiv TV channel appealed to the Ombudsman in connection with the failure to provide full public information by the City Council on the organisation of a trip of children from the Kharkiv community to the Czech Republic in June-July 2025. The request concerned the procedure for forming the lists of participants in the trip, the lack of a public announcement of the selection, the composition of the commission and the criteria for classifying children as "gifted".

In order to ensure the right to access public information, the Ombudsman's Secretariat sent a letter to the city council with relevant explanations of the legislation on access to public information and a request to provide a full and comprehensive response to the journalists' request. As a result of the Commissioner's Secretariat's response, the city council provided all the necessary information requested, which ensured the exercise of the right of citizens and media to access public information.

RECOMMENDATIONS:

To Kharkiv Regional Military Administration:

Ensure coordination of activities of local self-government bodies, balance holders and other responsible entities to bring all ICCs located in the region in line with the requirements of the Procedure for the functioning of places of temporary residence of internally displaced persons;

to take measures to eliminate systemic violations identified during monitoring visits, in particular in terms of ensuring accessibility of premises for people with reduced mobility;

to work out the issue of redistribution of evacuees between social protection institutions, taking into account their profile, design capacity and actual capabilities;

ensure strict compliance with the requirements of the legislation on access to public information and the right to appeal, in particular, under the legal regime of martial law;

ensure quarterly inspections of the technical condition of the premises of temporary accommodation facilities and timely elimination of identified deficiencies;

to take measures to provide alternative sources of electricity, heat and water supply to temporary accommodation.

Local self-government bodies of territorial communities, institutions, enterprises, organisations, district, city, town and village military administrations under their control:

Promote awareness among IDPs of available social services, support programmes and mechanisms for protecting their rights;

ensure the completeness, relevance and timely publication on official websites of information on decisions, regulations, contact details, methods of submitting appeals and requests, as well as the procedure for personal reception of citizens;

appoint an official responsible for internal control over the disclosure of information and publication of reports on consideration of requests for public information;

to mark the locations of the objects of the fund of protective structures on the territory of territorial communities, as well as to place signs to them;

to ensure free access to the premises of the objects of the fund of protective structures, the possibility of using them by persons with disabilities and other low-mobility groups of the population; to equip the objects of the fund of protective structures on the territory of territorial communities with communication and warning systems, power supply and ventilation;

place fire extinguishing equipment, emergency tools, drinking and industrial water, food supplies, first aid equipment, and sewage containers in the simplest shelters on the territory of territorial communities;

to equip communication and warning systems in the simplest shelters on the territory of territorial communities;

to match the number of employees of children's services with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Article 12 of the Law of Ukraine "On Ensuring Organisational and Legal Conditions for Social Protection of Orphans and Children Deprived of Parental Care";

to ensure compliance with the requirements of DBN B.2.2-40:2018 "State Construction Norms. Inclusiveness of buildings and structures. Main provisions" in educational institutions;

to ensure funding for nutrition for children in healthcare facilities, taking into account the individual needs of each child and to ensure the right of the child to a standard of living sufficient for physical, intellectual and moral development, including adequate nutrition;

to ensure that educational institutions provide proper social and pedagogical patronage and psychological support for children;

ensure the availability of specialists who have undergone appropriate training and implement programmes for offenders in each community.

Services for children of territorial communities, regional/district/city/township/village military administrations:

Continue to take measures to ensure the housing rights of orphans and children deprived of parental care through the registration of housing;

Ensure awareness-raising activities among the population, in particular on the procedure for identifying a child without parental care.

Centres for the provision of social services, centres of social services in Kharkiv region:

the regional centre for social services should analyse the needs of social service providers for additional training of social support specialists and, based on the results of such analysis, ensure the organisation and conduct of relevant training events;

to ensure mandatory social support and participation in correctional programmes for parents of a child who, according to the assessment of the needs of the family or individual, is in difficult life circumstances and has experienced domestic violence, in particular for perpetrators of such violence or child abuse.

Kharkiv Regional Territorial Centre for Recruitment and Social Support:

Strengthen internal control and preventive measures by conducting additional briefings with the staff, official inspections for each fact of possible violations of the procedure during mobilisation activities;

to introduce quarterly monitoring of the status of consideration of appeals and requests for information, in particular through internal inspections.

To the territorial recruitment and social support centres:

ensure that officials of the recruitment centres strictly comply with the requirements of the current legislation of Ukraine during the implementation of mobilisation measures, including in terms of preventing abuse of power, use of physical force, psychological pressure and other unlawful actions against citizens;

to ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the timeframe established by law;

to ensure proper organisation of office work and correspondence accounting.

To the territorial department of the State Judicial Administration of Ukraine in Kharkiv region and the courts of Kharkiv region:

to ensure the elimination of systemic violations in the courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated escort routes and arranging rooms for confidential communication with lawyers;

strengthen logistical support to ensure respect for human rights, including the rights to dignity, security, accessibility and effective defence.

To the National Police of Ukraine in Kharkiv region:

Ensure compliance with the standards of humane treatment of detainees, in particular by bringing the premises for detainees in line with the requirements of the Instruction on the organisation of the duty service of the bodies (units) of the National Police of Ukraine, as well as by arranging and ensuring accessibility of sanitary facilities for persons with disabilities and people with reduced mobility.

Private institutions providing care services (nursing homes):

Ensure safe conditions for clients by arranging shelters in accordance with the requirements of the law;
guarantee the observance of the right to freedom and personal integrity of clients, in particular by obtaining informed voluntary consent to stay in the institution and preventing unreasonable restrictions on freedom of movement;
to ensure the provision of social services in accordance with the individual needs of the wards, including by drawing up individual care plans, organising meaningful leisure activities and creating a barrier-free environment for people with disabilities and people with reduced mobility.

11.20. Kherson Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **1018** appeals from Kherson region, which contained **1207** reports of violations of human and civil rights. Among the most frequently mentioned human rights violations in the reports are: civil rights - **663** reports, social rights - **134** reports, personal rights - **89** reports, economic rights - **63** reports, children's rights - **55** reports, freedom from discrimination - **54** reports.

The number of	2022	2023	2024	2025 year
Citizens' appeals	367	975	982	1018

Reports of rights violations	453	1 096	1 081	1 207

The reporting period for the Kherson region was a stage of unprecedented challenges in the protection of human rights and freedoms. The Kherson region remains a unique and at the same time the most difficult region of Ukraine in terms of human rights activities, as it combines three critical conditions: the ongoing temporary occupation of the left bank, the reconstruction processes in the de-occupied territories and the status of an active combat zone for the right bank coastal strip. The enemy continues to systematically shell residential areas of the region's settlements, educational and healthcare facilities, as well as critical infrastructure.

Monitoring visits/on-site inspections

In 2025, the team of the Ombudsman's Office in Kherson region carried out **58** monitoring visits and **13** on-site inspections in various areas of ensuring observance of human and civil rights and freedoms.

In particular, **2** monitoring visits were carried out in the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention.

In 2025, **8** monitoring visits were conducted in the area of child protection.

In order to determine the level of accessibility of social infrastructure facilities in Kherson region, the team of the Representative Office conducted **6** monitoring visits to healthcare facilities in the region.

An important area of work at the regional level in Kherson region is the protection of the rights of persons affected by the armed aggression against Ukraine. In 2025, the team of the Mission conducted **23** monitoring visits to protect the rights of persons affected by the armed aggression against Ukraine, in particular to monitor the rights of internally displaced persons, visited **6** places of temporary residence, and conducted monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine".

In the area of protection of people's rights to a fair trial, **6** court hearings were monitored.

In the field of information rights protection, the team of the Representative Office carried out **13** on-site inspections.

Educational activities

In order to raise awareness about the protection of human and civil rights and freedoms, the team of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Kherson region initiated and held **31** information events with the involvement of the public, which were attended by 874 people.

Of these, **16** information events were held for 224 employees of local self-government and state authorities, community members to ensure observance of information rights; **6** awareness-raising events were held for internally displaced persons in places of temporary residence.

Main issues addressed by the Ombudsperson's Office:

- Protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances
- protection of the right to life and security;
- protection of children's rights;
- protection of citizens' information rights.

1. Protection of the rights of persons affected by the armed aggression against Ukraine

In the reporting year, the protection of the rights of the affected population in Kherson region was characterised by a transition from emergency assistance to solving long-term legal and property problems. The main areas of focus were the exercise of the right to compensation for housing and support for internally displaced persons.

According to the Kherson MVA, 7,778 applications for compensation for destroyed or damaged property were filed in 2025, but the process of exercising citizens' rights faces systemic obstacles:

- Inability to conduct surveys in the 'red zones': the main problem remains the inability of local government commissions to work in settlements located on the coastline (0-15 km from the Dnipro). Due to the constant attacks by FPV drones and artillery, it is physically impossible to inspect the objects, which leads to the suspension of applications;

- Lack of title documents: a large part of the housing stock in rural areas was not registered in the State Register of Property Rights until 2013. Since the BTI archives in many communities (including Kherson) were stolen or destroyed during the occupation, citizens found themselves in a situation where they could not prove their ownership without a court hearing.

A resident of Beryslav, citizen K., whose private house was completely destroyed as a result of a guided aerial bomb (GAB) hit, applied to the office. The applicant applied for a housing certificate through the eRestoration programme.

The Compensation Review Commission of the local military administration decided to suspend the application for an indefinite period. The reason for the refusal to make a final decision was the inability of the commission to visit the location of the property to conduct a physical inspection, as the territory is under constant fire and falls under the criteria of the "zone of active hostilities" (the so-called "red zone").

The Ombudsman's Office initiated an appeal to the Kherson DMA with proposals to use high-resolution satellite images in this case, which clearly recorded the complete destruction of the house. Also, to use the visual inspection reports drawn up by the SES during the firefighting at the site of the impact as an alternative confirmation of the destruction.

After the intervention of the office and the provision of additional evidence, the commission decided to resume consideration of the application, and the fact of property destruction was confirmed. Citizen K. received a positive decision on the accrual of compensation in the form of a housing certificate.

In 2025, a question arose about the complexity of the procedures for compensation for damage caused by the consequences of the Kakhovka hydroelectric power station explosion:

- *problems with verification of victims:* the Mission recorded numerous complaints about the refusal to pay one-time financial assistance due to the lack of registration of residence directly in the flood zone, although the actual residence was confirmed by witnesses.

- *the state of objects that cannot be restored:* it was found that some of the houses that were exposed to prolonged water exposure are legally considered "damaged", but are in fact emergency and uninhabitable due to the destruction of foundations and fungus.

The Ombudsman's Office was approached by citizen S., a resident of the Ostrov neighbourhood of Kherson. Kherson, who had been flooded as a result of the Kakhovka hydroelectric power station explosion. The applicant applied to the Kherson MVA for a one-time financial assistance in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 626 "Some issues of providing material financial assistance to the affected population as a result of the explosion of the Kakhovka hydroelectric power station dam by the Russian Federation", but was refused.

The reasoning for the refusal was that at the time of the Kakhovka hydroelectric power station explosion, citizen S. did not have an officially registered place of residence at the address of the house that was flooded. In fact, the applicant had been living in her late mother's apartment for more than 10 years, paying utility bills, which was confirmed by the testimony of neighbours and acts of condominiums, but was registered in another area of the city that was not in the flood zone.

The representative office provided advice to the applicant and prepared a request to the Kherson MVA and the Commission for consideration of the provision of targeted financial assistance. The legal position of the Supreme Court was emphasised that the lack of registration cannot be a ground for restricting human rights if the fact of residence is confirmed by other evidence.

Based on the response act of the Ombudsman's representative and the indirect evidence of residence provided, the Commission reconsidered its previous decision. The fact of citizen S.'s residence in the flooded area was found to be proven, and she received a one-time financial assistance payment in full.

Changes in the legislation on the allocation of accommodation allowance to IDPs caused a significant social outcry in the region:

- *loss of assistance to the most vulnerable categories.* The Mission processed 6 requests from pensioners and persons with disabilities whose payments were suspended due to formal discrepancies (e.g., availability of a deposit or purchase of foreign currency by relatives).
- *Specifics of "internal" displacement.* In Kherson region, a large number of people have moved from coastal communities within the region. These persons often face difficulties in finding employment in de-occupied but frontline communities with a limited labour market.

The representative office was approached by citizen V., an elderly internally displaced person from the temporarily occupied territory of Kherson region, who currently resides in Kherson. The applicant reported a sudden termination of her IDP accommodation allowance.

The Department of Labour and Social Protection of the Kherson City Council, during the automatic verification of data in the state registers, found that a vehicle with a production year of less than 5 years and a cost exceeding the established limit set by the Resolution of the Cabinet of Ministers of Ukraine No. 332 "Some issues of payment of accommodation allowance to internally displaced persons" had been purchased in the name of the applicant's daughter. Since the applicant's daughter remained officially registered at the same address as her

mother in the occupied territory, the system automatically included her in the "family (household)" and stopped payments to her mother due to non-compliance with the property criterion.

However, the applicant's daughter has been living abroad for more than three years, working independently and not running a joint household with her mother. Due to the occupation of their hometown, they were unable to officially change their place of registration.

The representative office provided explanations on the procedure for proving the fact of separate residence of the applicant and her daughter. With the assistance of the representative, they prepared

- an application to the Department of Social Security to exclude the daughter from the family for the purpose of calculating benefits;*
- evidence of separate residence: a copy of the daughter's passport with stamps of travelling abroad before the full-scale invasion and documents on her employment in another country.*
- a certificate of the applicant's actual residence in Kherson without her daughter's participation in the household.*

Based on the evidence provided and the intervention of the Mission, the social security authority decided to resume payments to citizen V. The Commission acknowledged that the property status of the daughter, who lives separately, cannot affect the right of a pensioner mother to receive state aid.

According to the Kherson CMA, since the de-occupation of part of the territory of Kherson region, the total number of people evacuated from evacuation points is **51,829**, including **7,005** children and **564** people with reduced mobility. A total of **11,463** people were evacuated by train, including **1,749** children and **248** people with reduced mobility. A total of **40,366** people were evacuated by road, including **5,256** children and **316** people with reduced mobility.

As of the end of 2025, **47,697** internally displaced persons were registered in Kherson region, of whom **6,893** were children under 18, and **375** were receiving social assistance.

Due to the evacuation of the population from the frontline communities, there are **6** temporary accommodation centres in the city and region. In December, by order of the Head of the Kherson City Military Administration of 12.12.2025 No. 1052r, **2** transit centres for the temporary stay of evacuees were established in the Kherson City Territorial Community. At the same time, some of them do not meet the minimum requirements for the life support of internally displaced persons. The four TACs to which people were sent are dormitories that are not fully equipped with sufficient furniture and household appliances, and are not adapted and architecturally inaccessible to people with limited mobility. The inspections also showed that **2** dormitory-based ICCs need to improve energy efficiency before the winter period and strengthen physical security measures for residents.

Based on the results of **6** monitoring visits to the CCs, it was found that only **1** of them is accessible to people with reduced mobility. At the same time, the need for additional accommodation is increasing, which is also relevant for the existing TACs.

As part of the monitoring of temporary accommodation for internally displaced persons, the Mission conducted an on-site visit to the modular town No. 1 in Kyselivka village, Chornobaivska community. The purpose of the visit was to check the living conditions and compliance with inclusiveness standards for vulnerable groups.

The monitoring results revealed a complete lack of an inclusive environment, despite the fact that the town is home to people with disabilities, including those who use wheelchairs.

The territory of the camp's yard has only an earthen surface. In rainy weather and during snowmelt, it becomes physically impossible for people with musculoskeletal disorders to move around the territory. The pedestrian paths connecting the residential modules with public facilities are covered with large gravel. This makes it technically impossible for people in wheelchairs to move independently and creates a high risk of injury for people with disabilities.

Due to the above barriers, people with disabilities are effectively locked inside the residential modules and are unable to fully enjoy the outdoors. It is worth noting that the representative office had previously pointed out these shortcomings to the community leadership and the ICC administration, but no effective measures were taken.

In the reporting period, the Representative Office prepared and sent a response act to the local authorities demanding immediate arrangement of the town's territory with hard surface and ramps in accordance with the barrier-free standards. At the time of preparation of the Annual Report, the recommendations of the Office remained unimplemented, citing a lack of budgetary funds.

The state of implementation of the recommendations and measures taken to restore the violated rights of persons affected by the armed aggression against Ukraine is under the control of the staff of the Ombudsman's Office in Kherson region. Out of **104** recommendations provided: **54** were implemented; **42** are in the process of implementation; **8** were not implemented.

2. Protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances

Given the ongoing military aggression and high intensity of hostilities in the Kherson sector, the issue of observing the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances has become a special priority. During the year, **12**

meetings with families were held, attended by 86 people, and advisory assistance was provided.

The regional office received 3 appeals on the issue of ensuring the right of a serviceman to be discharged from service for health reasons. The main issues were focused on the stages of military medical commissions and the implementation of their decisions by unit commanders.

Three cases were identified where unit commanders, citing a lack of personnel on the contact line, ignored reports from servicemen about their deteriorating health and refused to provide a referral for a medical examination. refused to provide a referral for a medical examination. The regional office received **6** applications from people who disagreed with the conclusions of the commissions on the degree of fitness. The representative office provided an algorithm of actions for appealing such decisions to a higher-level MEC or the Central MEC.

Even if the MEC concludes that a person is "unfit for military service with exclusion from the military register", the process of actual discharge can take weeks due to the slow transfer of documents between medical institutions and military units.

The Ombudsman's Office in Kherson region was approached by a serviceman D., who served in one of the military units stationed directly in Kherson. The applicant reported that after a long treatment, he underwent a second medical examination by a hospital military medical commission, which resulted in a decision on his unfitness for military service with exclusion from military registration due to a serious illness contracted while performing military service.

Immediately after receiving the conclusion of the MEC, the serviceman submitted a report to the unit commander on his discharge from service for health reasons. However, the report remained without consideration for three weeks. The unit command did not issue an order for dismissal and did not remove the serviceman from the personnel lists, which effectively forced the person with a critical health condition to continue to stay in the area of active hostilities under constant shelling.

Due to the explanatory work of the Ombudsman's representative, the report of the serviceman D. was satisfied. The serviceman was officially discharged from the Armed Forces of Ukraine, removed from the personnel lists and sent to his place of residence for further treatment.

A separate aspect of the Office's work was the consideration of 4 complaints against the actions of territorial recruitment and social support centres in relation to citizens who have legal grounds for exemption from military duty.

The Ombudsman's Office in Kherson region was approached by a citizen N., a resident of Kherson. The applicant reported that in July 2025, he had undergone a medical examination by the military medical commission at the Kherson Regional

Military Medical Centre and Joint Forces in accordance with the procedure established by law. Based on the results of the examination, a decision was made that he was unfit for military service and was excluded from military registration.

However, when checking the documents at one of the checkpoints in the Kherson region, representatives of the National Police found that the electronic register "Oberih" listed citizen N. as a "person liable for military service" who was wanted for evading the military registration and enlistment examination. On the basis of this information, the applicant was forcibly brought to the district MCC and JV for "re-passing the commission", despite the fact that he presented the original document on his exclusion from the register.

In the course of responding to the appeal, the Mission conducted explanatory work and clarified the circumstances. As a result, the status of citizen N. in the Oberig system was changed to "Excluded from military registration". Representatives of the TCC and the JV officially apologised to the citizen, and the search activities were cancelled.

3. Protection of the right to life and security

The activities of the Representative Office in this area were focused on ensuring the principle of non-discrimination in the provision of public services, accessibility of security facilities for people with limited mobility and protection of the rights of the most vulnerable residents of frontline communities.

In the context of constant shelling, the right to life directly depends on the ability to take shelter in time. Monitoring **visits to modular and permanent shelters** in Kherson and surrounding areas have revealed that many of the protective structures do not meet the requirements of inclusivity: there are no ramps, doors are too narrow for wheelchairs, and there are no handrails. Based on the results of **13** monitoring visits, reports with recommendations were drawn up and sent to the responsible entities for response measures.

A resident of Kherson, who uses a wheelchair, contacted the office. He reported that a modular ground shelter installed near his house had a high threshold and no ramp, which made it impossible to use it independently during an air raid.

The Ombudsman's representative conducted an on-site monitoring of the facility. Violations of barrier-free accessibility requirements were recorded. A letter was sent to the city military administration with a request to bring the shelter in line with inclusivity standards. Within 10 days, a stationary ramp with a standardised slope was installed near the shelter. In addition, the city authorities conducted an

audit of similar structures in the area, which improved accessibility for 4 more civil protection facilities.

The status of implementation of the recommendations and measures taken to restore the violated rights of children is monitored by the staff of the Ombudsperson's Office in Kherson region. Out of **14** recommendations: **1** has been implemented; **8** are in the process of implementation; **6** have not been implemented.

4. Protection of children's rights

In the context of daily terrorist attacks on the civilian infrastructure of Kherson region, the protection of children's rights has moved from the plane of development to the plane of physical survival and mental health. In the reporting period, the team of the regional office conducted 8 monitoring visits in the field of child protection.

A resident of the village of Chornobaivka, citizen L., applied to the office on behalf of her young daughter. The applicant reported that the social protection authority had refused to grant the child the status of a "child affected by hostilities". The reason for the refusal was the absence of a physical injury or an official expert opinion on psychological trauma, despite the fact that the family had been under occupation and constant shelling for 9 months.

The Representative Office provided advice and sent a letter of request to the relevant children's service. It was emphasised that the law stipulates that the fact of a child's stay in the combat zone and the experience of living under occupation (psychological violence) is an independent and sufficient ground for granting the status.

Thanks to the intervention of the Mission, the decision to refuse was reconsidered and cancelled. The child was granted the appropriate status, which allowed the family to access international rehabilitation programmes, priority rights to recreation in children's camps and free meals at school.

In connection with the constant hostile shelling of the region's settlements, the Mission's team, together with the units of the Main Department of the National Police in the region, the Main Department of the State Emergency Service, and local authorities, is

constantly conducting explanatory work on evacuation from the territories under constant shelling to safer regions.

Parental refusal to evacuate remains a problematic issue during the compulsory evacuation of children. According to the Kherson CMA, **746** children were evacuated from 50 settlements where hostilities are taking place.

In addition, according to the Kherson Regional Military Administration, the Kherson region remains one of the most mined in the world. In 2025, 11 cases of children being injured by explosive detonations while walking or at home were recorded. The Mission initiated compulsory mine safety lessons for children, even in a remote format, and to distribute information materials to parents in the communities under occupation.

In the reporting period, the Mission paid special attention to the issue of exercising the right to education in conditions that threaten the life and health of participants in the educational process. The Mission conducted 3 on-site monitoring visits to general secondary education institutions in Bilozerska, Chornobaivska and Vysokopilska communities of Kherson region. The purpose of the visits was to establish the real state of ensuring children's rights to safety, inclusiveness and quality of the educational process under martial law. The visits revealed systemic violations. Of the **64** recommendations provided, **50** have been implemented; **6** have been partially implemented; and **8** are in the process of being implemented.

In all three communities, gross violations of inclusivity standards were recorded. Educational institutions and their shelters are not properly equipped for access by children with disabilities and other groups with limited mobility. The lack of ramps with a standardised slope, specially equipped sanitary rooms and tactile elements makes it impossible for children with special educational needs to exercise the right to education in a full-time or mixed format.

There is a critical lack of social workers in Bilozerska and Chornobaivska communities. The work of staff psychologists is not fully implemented and does not meet the urgent needs of children who have survived the occupation and are under constant shelling. The methods of work are outdated and do not take into account the specifics of war trauma. The situation is even more critical in the Vysokopilska community - there are no psychologist or social educator positions in the educational institution. This deprives students of their basic right to psychosocial support under martial law.

In Bilozerska and Chornobaivska communities, education has been completely moved to the simplest shelters. In Chornobaivska community, the simplest shelter requires significant refurbishment. In Bilozerska and Vysokopilska communities, the condition of the shelter itself was assessed as adequate (satisfactory): the premises are dry, ventilated and suitable for living.

In the educational institutions of all the inspected communities, the state of catering for students was found to be unsatisfactory. Instead of a full hot meal, children receive only canteen products (dry rations, baked goods), which does not meet the physiological needs of the child's body and the norms of the CMU Resolution No. 305.

5. Protection of citizens' information rights

Access to public information under martial law is a guarantee of government transparency and public trust. However, in the Kherson region, the exercise of this right faces challenges related to both the security situation and the subjective interpretation of legislation by information managers.

In 2025, the team of the Representative Office conducted **13** on-site inspections of the websites of state authorities and territorial communities regarding compliance with the right of citizens to apply and access information. The team identified 17 cases where information holders used the stamp "for official use only" or refused to provide information, citing martial law without proper justification. In the de-occupied communities, many local government websites have not been updated for a long time or have been blocked for security reasons, depriving citizens of the opportunity to review decisions on the budget, distribution of humanitarian aid and recovery plans.

Access to information on the use of public funds and humanitarian aid is the most sensitive category of requests from residents of Kherson region. Citizens have the right to know how the resources used to eliminate the consequences of the shelling and the explosion of the Kakhovka hydroelectric power station are used.

There were 2 refusals to provide estimates for the repair of shelters or lists of recipients of assistance.

An NGO applied to the Kherson City Military Administration of the Kherson region with a request to provide a list and status of readiness of shelters repaired with budgetary funds in 2024-2025. The administrator refused to provide the information, stating that this data "could be used by the enemy to adjust fire", and responded that all information was classified for the duration of martial law.

After receiving the complaint, the Mission conducted a legal assessment of the refusal. It was found that the addresses of the shelters were already public knowledge. Information on the amount of money spent and the technical characteristics of the structures is publicly available. In addition, the administrator did not conduct the "three-part test" and did not prove the reality of the threat.

Following the Ombudsman's response, the military administration reconsidered its decision and provided the requested information. This ensured public control over the quality of civilian protection facilities.

During the reporting period, the office received 11 appeals regarding refusals of local self-government bodies, municipal enterprises and institutions to provide information on salaries, bonuses and other payments to officials. Information administrators in Kherson region widely treat information about the income of the management as "confidential information about a person" or "personal data", access to which is prohibited without the consent of the person. However, this position directly contradicts the current legislation of Ukraine.

A citizen M. appealed to the Ombudsman's representative with a complaint against the actions of the administration of the Regional Territorial Centre for Emergency Medical Care and Disaster Medicine of the Kherson Regional Council. The applicant repeatedly sent inquiries requesting information on monthly salary, allowances and bonuses of the management of the said municipal enterprise for 2025. The information manager systematically refused to provide this information, arguing that "salaries are personal data of employees" and that their disclosure under martial law could pose a danger to their lives.

The Mission conducted explanatory work with the management of the CNP: The municipal non-profit enterprise uses the property and funds of the community, so its financial activities are open. The issue of remuneration of medical managers in the frontline region is a matter of high public interest. Access to information on the salaries of officials paid from the local or state budget cannot be restricted.

As a result of the intervention of the Ombudsman's Office and explanatory work, the management of the Regional Territorial Emergency Medical Care Centre acknowledged the illegality of its previous refusals. Citizen M. was provided with full and comprehensive information on the structure and amount of payments to the centre's officials. This helped to relieve social tension and ensure transparency in the use of regional budget funds in the medical sector.

The state of implementation of the recommendations and measures taken to restore the violated rights to information is under control of the staff of the Commissioner's office in Kherson region. Out of **66** recommendations provided: **49** were implemented; **17** are in the process of implementation.

RECOMMENDATIONS:

To Kherson regional state administration, regional military administration:

develop an algorithm for promptly granting the status of "child affected by hostilities" based on the fact of being under occupation, eliminating the requirement for unnecessary certificates of physical injuries;

conduct an audit of all modular and permanent shelters in the region for compliance with inclusivity standards and eliminate the identified shortcomings.

take urgent measures to fill the vacancies of social educators and psychologists in schools in Bilozerska, Chornobaivska and Vysokopil'ska communities;

to move away from using exclusively canteen products and develop mechanisms to return to hot meals in institutions where the educational process is ongoing;

conduct an inventory of technical equipment (tablets/laptops) among vulnerable children and provide them with devices for distance learning.

Ensure proper support and prompt transfer of documentation by the members of the MEC commission on persons declared unfit for service to military units and TCCs and JTFs in order to avoid delays in their dismissal

To local self-government bodies and local military administrations:

To equip the entrance groups of shelters and educational institutions with ramps and other accessibility elements in accordance with the DBN;

In communities with unstable communication, introduce alternative methods of notification of social benefits, evacuation and registration for the eRestoration programme.

11.21. Khmelnytskyi Region

During the reporting period, the Ukrainian Parliament Commissioner for Human Rights received **6,166 appeals** from Khmelnytskyi region, containing **7,060 reports of violations** of human and civil rights and freedoms.

Among the most frequently mentioned human rights violations in the reports are: civil rights - **5,409** reports, social rights - **370** reports, economic rights - **252** reports, children's rights - **109** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	1 223	2 960	4 435	6 166
Reports of violations of rights	1 520	3 645	4 978	7 060

The geographical location of the Khmelnytskyi region determines its role as a rear region, which plays an important role in providing humanitarian support to the population and hosting internally displaced persons. The massive displacement of the population from the occupied territories and active hostilities has raised the issue of observance of the rights to adequate housing, social protection, healthcare and employment. Particular attention is also needed to ensure the rights of vulnerable categories of citizens whose social vulnerability has increased under martial law. Periodic air raids and missile attacks on infrastructure affect the security situation in the region. Under such conditions, the issues of ensuring the right of citizens to security and accessibility and the proper condition of the region's defence facilities remain relevant.

The priority task of the Ombudsman's office is to systematically monitor the observance of constitutional rights of citizens, hold meetings with military families and receptions of citizens, as well as educational activities, which allows to identify problematic issues and respond to them by providing appropriate recommendations, the implementation of which ensures the restoration of rights and improvement of the organisation of community work in various areas of observance of the rights of community residents.

Monitoring visits/on-site inspections

In 2025, the team of the Office of the Ukrainian Parliament Commissioner for Human Rights in Khmelnytskyi region carried out **240** monitoring visits, visits and inspections in various areas of ensuring observance of human and civil rights and freedoms

- observance of children's rights - **36**;
- observance of the rights of internally displaced persons - **68**;
- implementation of the functions of the national preventive mechanism - **23**;
- observance of procedural rights - **30**;
- observance of citizens' information rights - **27**;
- monitoring of objects of the fund of protective structures - **56**.

In addition, **10** (cluster) visits to places of detention were conducted in the region as part of the implementation of the national preventive mechanism, monitoring of the implementation of the veteran policy and the implementation of a system for assessing the daily functioning of a person in healthcare facilities in the region.

Based on the results of the detected violations, **4** Submissions of the Ombudsman were sent: **3** - regarding violations of the rights of vulnerable children in Krupetska, Berezdivska, Hannopilska rural territorial communities, **1** - based on the results of a visit to the NPM Department of Social Services in the conditions of round-the-clock stay/residence "Dobrota" of the municipal institution "Centre for the provision of social services of the Horodok City Council".

Educational events

The key event of 2025 was the opening of the Human Rights Protection Centre in Khmelnytskyi region on 18 December, which aims to ensure accessibility of the Ombudsman institution to citizens, prompt response to human rights violations, strengthening of cooperation with civil society institutions, legal education and increasing the level of interaction between citizens and the Ombudsman institution at the regional level.

In 2025, the regional office carried out comprehensive legal education activities aimed at ensuring awareness of the procedure for exercising constitutional rights and freedoms of human and civilians under martial law and preventing their violations. During the reporting period, **136** awareness-raising events were held for state and local

government officials, representatives of educational institutions, and the public, and active cooperation with students continued.

The team of the regional office held **3** conferences, **12** information events on observance of the rights of military personnel, veterans and their families, **9** events on observance of children's rights, **32** educational events for internally displaced persons in places of temporary residence, **17** events for pupils and students.

In order to form a common understanding of the balance between openness of information and protection of personal data, as well as awareness of the responsibility of officials in the field of observance of information rights of a person and a citizen, in 2025 the regional office held **22** outreach events for officials of executive authorities, local self-government, law enforcement agencies, representatives of the legal community and the media.

Cooperation with students and educational institutions is of long-term strategic importance, as it is aimed at developing legal culture, civic responsibility and human resources in the field of human rights protection. On 11 April 2025, the Ombudsman Ambassadors Scientific and Educational Club was established at the Bohdan Khmelnytskyi National Academy of the State Border Guard Service of Ukraine under the Memorandum of Cooperation to develop professional legal competence of cadets and engage them in legal education activities.

During the year, **8** meetings of the club were held, as a result of which the cadets prepared their presentation projects and held **9** information events for 309 cadets of the Academy to form the legal awareness of future border guard officers.

The educational project "Ombudsman Ambassadors" has been implemented for the second year at the Leonid Yuzkov Khmelnytsky University of Management and Law, where in 2025 students held **24** information events on the role of the Ombudsman in human rights protection for high school students.

In Khmelnytskyi region, the Youth Ombudsman project was launched in 2025, involving **25** higher and vocational education institutions of the region.

The main issues addressed by the Ombudsman's office were

- protection of the rights of military personnel and their families;
- protection of children's rights;
- protection of human rights in places of detention;
- protection of the rights of internally displaced persons;
- protection of information rights of citizens;
- ensuring equal rights and opportunities and creating a barrier-free environment.

1. Protection of the rights of military personnel and their families

In order to ensure prompt and accessible interaction between the state and the families of prisoners of war and missing defenders of Ukraine, the Regional Working

Group of the Coordination Headquarters for the Treatment of Prisoners of War was launched in Khmelnytskyi region on 1 May 2025.

During the reporting period, the regional working group, led by the Ombudsman's representative, held **18** meetings in different communities of the region with families of prisoners of war and missing servicemen, covering **2,074** people. The staff of the office ensured regular receptions of relatives of prisoners of war and missing persons, providing consultations and assistance in resolving problematic issues. During the first 8 months of 2025, **261** citizens received consultations at and were assisted in registering **60** personal electronic accounts on the official website of the Coordination Centre.

On 18 December 2025, a large-scale meeting with the families of servicemen was held in Khmelnytskyi, with **524** participants, with the personal participation of the Ukrainian Parliament Commissioner for Human Rights.

In total, **34** meetings with families of prisoners of war and missing persons were held in Khmelnytskyi region in 2025. The total number of participants was **3,060**.

During the meetings with the families, the following issues were discussed: pre-trial investigation of disappearances under special circumstances; forensic examinations and identification; repatriation of the bodies of fallen defenders; drafting requests to the Russian side; provision of social benefits to servicemen and their families; technical aspects of creating and filling in personal accounts.

The activities of the regional working group of the Coordination Headquarters in Khmelnytskyi region proved to be effective due to constant communication and on-site meetings with the families of the military, and the proximity to receiving explanations, support and necessary assistance.

2. Protection of children's rights

To exercise the function of parliamentary control over the observance of children's rights, the staff of the regional office conducted **36** monitoring visits, including **8** to institutional care facilities, **14** to the services for children of territorial communities in Khmelnytskyi region, **11** to general secondary education institutions, **2** to recreation facilities, and **1** to health care facilities.

Monitoring visits to community services for children in the region revealed systemic violations in their activities, namely no measures are taken to ensure the housing/property rights of orphans and children deprived of parental care; no control is exercised over the conditions of maintenance, upbringing and development of orphans and children deprived of parental care who are placed in families of guardians, caregivers, foster families, family-type children's homes; improper maintenance of personal files of orphans, children deprived of parental care and children in difficult life circumstances; no proper maintenance, registration and execution of

Based on the results of the monitoring, **three** submissions of the Ukrainian Parliament Commissioner for Human Rights were made to the children's services of Krupets, Hannopil and Berezdiv village councils. The measures taken have ensured the restoration of the rights of children in status categories to special protection and assistance provided by the state.

During a monitoring visit to the Service for Children, Family and Youth of the Hannopil Village Council (hereinafter referred to as the Service), the monitoring group identified a number of violations of the rights of vulnerable children.

The Service did not monitor the recovery of alimony for the maintenance of children deprived of parental care; the stay of children placed in family-based care (there are no schedules for monitoring the conditions of maintenance, education and development of orphans and children deprived of parental care who are placed in families of guardians, trustees, and no annual reports on the state of maintenance, education and upbringing of children in this category); personal files do not contain information on the issuance of passports of Ukrainian citizens to 3 children upon reaching the age of 18. The issue of establishing guardianship over the property of orphans and children deprived of parental care was also problematic. The Service did not properly conduct legal awareness-raising activities among community residents on the establishment of family-based care in the community, as there are no family-based care facilities in the community, which contradicts the best interests of children. In addition, the Regulation on the Service significantly narrowed its tasks in terms of ensuring the protection of housing and property rights of orphans and children deprived of parental care, which violates the child's right to a decent standard of living.

The Ombudsman took response measures by sending a submission demanding immediate elimination of the identified violations of children's rights and shortcomings in the work of the Service. Following the Commissioner's intervention, the Service:

- Custody of the property of orphans and children deprived of parental care was established;*

- sent inquiries to the departments of the State Enforcement Service to obtain information on the status of arrears of child support for children deprived of parental care;*

- personal files of children and other documentation necessary for the proper protection of children's rights were brought in line with current requirements;*

- control over the conditions of maintenance, education, and upbringing of children placed in family-based care was strengthened;*

- a new Regulation on the Service was approved, which regulates the main activities of the Service, its powers and organisational principles of work, which will help to increase its efficiency and transparency.*

Based on the results of the monitoring conducted in 2025, the regional office noted the proper organisation of work in the children's services of the Novodunayevka village council and the Sudylkiv village council.

Improvements in the situation and proper organisation of work in institutional care facilities were recorded, in particular in the Solobkovets, Iziaslav, Kamianets-Podilskyi educational and rehabilitation centres, as well as in the Yampil and Kamianets-Podilskyi special schools of the Khmelnytskyi Regional Council.

However, in some institutions, the issue of compliance with the housing standard per pupil remains unresolved, which violates the child's free space; ensuring barrier-free accessibility for people with limited mobility to all premises; ensuring children's right to

privacy (there are no partitions in some sanitary rooms); submission of quarterly reports on the implementation of individual plans for the social protection of children, in particular in the Podolianchyk Centre for Social and Psychological Rehabilitation of Children.

The regional office also identified typical violations of the law during monitoring visits to educational institutions, in particular: the positions of psychologist and social pedagogue are not staffed, which can lead to untimely provision of psychological assistance to children who have suffered violence and abuse, as well as support and development of a psychologically safe educational environment in an educational institution; educational institutions do not have a licence to carry out economic activities in medical practice, despite the fact that a medical centre operates on its basis.

During the monitoring visit to the Lisovohrynivtsi Lyceum, the Mission's team identified a number of these violations, in particular: the institution is understaffed with psychologist and social pedagogue positions; the sanitary and hygienic premises of the lyceum, where junior school students study, lack a lock on the door and partitions (screens), which violates children's right to privacy; there are shortcomings in the organisation of the students' meals; the premises of the educational institution and the shelter are not provided with an adequate level of accessibility and barrier-free access.

Based on the findings of the violations, a report with recommendations was sent to the head of the Lisovohrynivka village council and the lyceum director. As a result of the response, the institution took measures to eliminate the violations: privacy in the sanitary and hygienic room was ensured; measures were taken to fill vacant positions; food was labelled; daily samples of meals were posted; and information materials on the rights and obligations of all participants in the educational process were posted.

The issue of observance of children's rights in the region is under control of the staff of the Ombudsperson's Office in Khmelnytskyi region. Of the **298** recommendations provided, **244** were implemented, **37** are in the process of implementation, and **17** were not implemented.

3. Protection of human rights in places of detention

In 2025, the team of the Ombudsperson's Office in Khmelnytskyi region made **23** visits to places of detention within the framework of the national preventive mechanism, including **2** visits to private social institutions.

To fulfil the functions of the national preventive mechanism, representatives of NGOs also made **4** repeat visits to social institutions in Khmelnytskyi region as part of the Regional Groups of the National Preventive Mechanism project, including **3** to private geriatric nursing homes.

The visits revealed violations of human rights and freedoms, including the right to protection from torture, cruel or degrading treatment or punishment; the right to health care, proper medical care; the right to respect for private and family life; the right to an

adequate standard of living; and the right to accessibility, including for people with disabilities and people with reduced mobility.

The NPM team also identified shortcomings in the activities of residential care homes for the elderly and persons with disabilities, as well as systemic violations that lead to violations of the rights and freedoms of the residents.

During a visit to the Samchykovo residential care home for the elderly and disabled, the NPM team identified a number of violations in the institution's activities that negatively affect the rights of the residents. In particular, a ward B. with severe pain and trophic ulcers on his back and legs was found, who had not been taken to a surgeon or traumatologist for examination. Medical care was provided by the medical staff of the institution, but the methods of treatment and care did not alleviate the patient's condition. Other violations in the organisation of timely medical care for the wards, violations of the right to life and security and to an adequate standard of living were also identified.

Based on the results of the response letters, measures were taken to improve the living conditions of the wards in this institution. In particular, the wards who needed inpatient treatment were hospitalised, additional furniture was purchased to improve living conditions and the construction of a shelter was completed.

At the same time, there are social institutions in the region, which were visited and found to be in compliance with the rights of their clients and recommended that the example of their work be spread to other social institutions in the region.

A visit to the Bakhmatovets residential care home for the elderly and disabled found that the wards were provided with adequate living conditions.

The home is included in the register of social service providers. In addition, the institution has a medical practice licence, and the residents are provided with round-the-clock medical care and proper health monitoring in accordance with their doctors' prescriptions. An annual in-depth comprehensive examination of the wards by specialised doctors is organised. Wards with disabilities are provided with technical rehabilitation equipment and special care products, including functional beds, medical equipment to restore and improve motor activity, means to facilitate the movement of the elderly and small mechanisation equipment. If necessary, we take measures to provide prosthetics for our clients. Various thematic events, film screenings, art classes, and participation in sports competitions among social institutions are regularly organised for the clients.

During visits to the regional police authorities, violations of the right of detainees to proper conditions of detention were recorded, which does not meet the requirements of national and international law.

During a visit to Police Station No. 1 (Slavuta) of the Shepetivka District Police Department of the Main Department of the National Police in Khmelnytskyi region (hereinafter referred to as Police Station No. 1), the NPM group identified violations and

shortcomings in ensuring proper conditions of detention of detainees; the right to life in terms of ensuring the safe stay of persons in the premises of the police station during the "Air Alert" signal, to health care, to barrier-free access to all premises of Police Station No. 1, as well as shortcomings in the maintenance of official documents.

Based on the findings of the violations, a report with recommendations was prepared and sent to the management of the Khmelnytskyi Oblast Main Police and the Phase 1.

In order to implement the recommendations, the officials of the Detention Centre No. 1 took a number of measures aimed at eliminating the identified shortcomings and violations and ensuring proper conditions for detainees.

The room for detainees was equipped with the necessary household equipment and furniture, namely a table for eating, a stool and shelves for storing personal belongings. In addition, the room is equipped with a call button for prompt contact with police officers to respond in a timely manner to possible emergencies, including cases of violence among detainees, suicide attempts or fire.

Information materials on designated safe places (assembly points) for personnel, evacuation plans, and directional signs to the nearest shelter were posted in the premises of the police station No. 1; training was also conducted for personnel, during which regulatory acts defining the algorithm of actions of police officers in the event of detention of persons in need of antiretroviral therapy were reviewed. In order to ensure barrier-free access to all premises of the police station, measures were taken to install a portable metal ramp.

In order to prevent violations in the maintenance of official documents, the staff of the police station No. 1 was reminded to strictly comply with the requirements for its maintenance, in particular the Logbook of delivered, visitors and invited persons, as well as to properly record the measures taken in relation to delivered persons.

4. Protection of the rights of internally displaced persons

In 2025, Khmelnytskyi region remained one of the relatively stable regions of Ukraine for receiving and accommodating internally displaced persons. The region is characterised by a well-developed social protection infrastructure, an extensive network of administrative and social service centres, as well as active cooperation of local authorities with international and national humanitarian organisations, which helps to meet the basic needs of IDPs.

In order to verify the observance of the rights of internally displaced persons to decent living conditions, as well as to conduct educational and awareness-raising activities on the possibilities of exercising and protecting their rights, the regional office conducted **68** monitoring visits to places of temporary residence in 2025.

During the monitoring visits, the ICC's compliance with the minimum requirements set out in the ICC's Procedure for the Functioning of the ICC, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 dated 01.09.2023, was checked, the level of ensuring proper living conditions, compliance with security and privacy requirements for residents, and accessibility for various categories of persons, including people with reduced mobility, was assessed. The visits revealed certain

shortcomings in the organisation of IDPs' accommodation that need to be addressed by the relevant authorities and the ICC balance holders. At the same time, repeated monitoring visits revealed partial implementation of the recommendations provided by improving conditions and providing accommodation for IDPs free of charge.

During the 2024 monitoring visits to the ICC at dormitories No. 1 and No. 2 of the Kamianets-Podilskyi Professional College of Construction, Architecture and Design and the Khmelnytskyi City Centre for Social Support and Adaptation, it was found that IDPs had to pay utility bills. Based on the results of the monitoring, reports were sent to the owners/balance holders of the ICCs with relevant recommendations to ensure compensation for such expenses at the expense of the state.

Based on the results of repeated monitoring of the above-mentioned ICCs in April 2025, the implementation of the previously provided recommendations to take the necessary measures to ensure compensation for utility costs in accordance with Resolution of the Cabinet of Ministers of Ukraine No. 261 dated 11 March 2022 was established. The Kamianets-Podilskyi Vocational College of Construction, Architecture and Design has provided compensation for utility costs for dormitory residents, so that internally displaced persons no longer have to pay these costs out of their own funds. The Khmelnytsky City Centre for Social Support and Adaptation also ensured that IDPs can live without paying for utilities.

The results of the monitoring visits indicate that there are systemic problems in ensuring adequate living conditions for IDPs in temporary accommodation, in particular, typical violations include: lack of barrier-free access for people with reduced mobility; inadequate arrangement of living quarters and insufficient furnishings; problems with heating or heat supply, as well as lack of basic safety equipment (fire extinguishers, evacuation plans); non-compliance with sanitary and hygienic requirements.

Further provision of decent living conditions requires a systematic approach by the state authorities and local self-government bodies, in particular in terms of funding, compliance with safety standards, accessibility and sanitary and hygienic requirements.

Based on the results of the monitoring visits, the Khmelnytskyi Regional Military Administration and the owners/balance holders of the TACs were provided with recommendations to take appropriate measures to ensure proper living conditions for internally displaced persons in the TACs, in particular in terms of repair work in living rooms, sanitary and hygienic facilities; ensuring architectural accessibility of the TAC buildings, as well as barrier-free access and use of their facilities.

Of the **347** recommendations made, **117** were implemented, **196** were in progress, and **34** were not implemented.

In 2025, the regional office carried out **56** monitoring visits to the **facilities of the fund of protective structures** in the region. The monitoring visits revealed that protective structures located in state and municipal institutions are mostly maintained in

proper technical and sanitary condition. Minor violations were identified that are not systemic, which indicates the existence of organisational control and responsibility of the balance holders. Such facilities are usually provided with basic safety conditions, engineering networks, information signs and primary response equipment.

At the same time, monitoring of shelters located in apartment buildings revealed systemic problems. Many of these protective structures have violations of operational and safety requirements, including the lack of necessary equipment for people to stay, inadequate water and fire extinguishing equipment, and lack of barrier-free access for people with limited mobility.

At the same time, some positive examples of proper maintenance of shelters in the housing stock have been identified, which confirms that it is possible to comply with the established requirements, provided that responsibility is clearly defined and properly coordinated by local authorities.

The results of the monitoring visits show a significant difference in the level of readiness of civil protection facilities depending on the type of facility. While shelters in state and municipal institutions mostly meet basic safety requirements, the condition of shelters in apartment buildings remains problematic and requires systemic solutions. The identified shortcomings can be addressed by strengthening the role of local governments, introducing uniform standards for the maintenance of shelters and providing adequate resources to balance holders.

Based on the results of monitoring visits, **207** recommendations were provided to balance sheet holders, local governments and state authorities, of which **120** were implemented, **39** were in the process of implementation, and **48** were not implemented.

5. Protection of citizens' information rights

During the reporting period, the Regional Office carried out 23 inspections of compliance by state authorities and local self-government bodies with the human and civil right to appeal and information under martial law, as well as 4 inspections in the field of personal data protection. Based on the results of the inspections, reports and orders with recommendations and requirements to eliminate the identified violations were sent to the relevant authorities and local self-government bodies.

The inspections revealed systemic violations in the activities of information administrators in terms of ensuring transparency and openness of their activities, as well as the creation of appropriate mechanisms for exercising the right of everyone to access public information, and improper disclosure of information in accordance with the requirements of the Law of Ukraine "On Access to Public Information".

The problem of identifying officials in territorial communities authorised to receive and register oral appeals and requests from citizens, as well as to receive telephone calls, was identified. For example, the inspections revealed that the right of citizens to submit oral appeals by calling the telephone number listed on the official website of Antoninska,

Berezdivska, Viytovetska, Hannopilska, , Humenetska, Mykhaylyutska, Novodunayevetska, Satanivska, Teofipolska territorial communities is not ensured.

Inspections of the observance of the right to appeal and information by Berezdiv, Bilohirsk, Humenets, Mykhailiutske village councils and Satanivka settlement council revealed improper organisation of work with appeals and requests for information and improper disclosure of public information. Based on the results of the inspections, reports were prepared with recommendations to eliminate these violations, which were sent to the heads of the councils.

In response to the recommendations contained in the reports, these councils took appropriate measures, in particular, they published information on the mission, functions, powers, main tasks, principles of formation and amount of remuneration, remuneration, additional benefits of the chairman of the council; the procedure for drawing up, submitting a request for information, appealing against decisions of information managers, actions or inaction; information on mechanisms or procedures by which the public can represent its interests or otherwise influence the exercise of the manager's powers. In addition, measures have been taken to register them as information administrators on the Unified State Open Data Web Portal. The implementation of the recommendations provided ensured the restoration of the information rights of the residents of these communities.

In order to eliminate violations of information rights and prevent their recurrence, the Regional Office intensified educational activities among information administrators in Khmelnytskyi region, during which it was recommended to: ensure availability of information on official websites on the procedure for exercising the right of citizens to apply and request access to public information, establish telephone lines for recording oral appeals and making appointments for personal appointments, ensure proper publication of information on the official website of the Regional Office.

Out of **108** recommendations, **91** were implemented, **6** were in the process of implementation, and **11** were not implemented.

In 2025, the regional office conducted **4** on-site inspections of the state **of observance of citizens' rights to personal data protection** during their processing by officials of state authorities and local self-government bodies.

The inspections revealed a number of violations of the Law of Ukraine "On Personal Data Protection" that result in restrictions on the rights of personal data subjects.

In particular, contrary to the requirements of the law, the consent of personal data subjects is withdrawn from them in cases where the relevant legal basis, as defined by law, does not require such consent. In addition, the inspections revealed facts of failure to notify citizens of the composition and content of the collected personal data, the purpose of their processing, and the persons to whom such data is transferred. These violations were recorded in Shepetivka City Council and Khmelnytskyi Vodokanal.

Special attention during the inspections was paid to assessing the organisational support for personal data protection.

During the inspection, the Shepetivka City Council found that there were no approved internal documents that would determine the procedures for processing and protecting personal data, taking into account the specifics of personal data processing. In particular, the following were not developed and approved: internal rules (regulations) on the procedure for processing and protecting personal data; an employee action plan in case of unauthorised access to personal data, damage to technical equipment or emergencies; the procedure for employees to access personal data depending on their job responsibilities. Such organisational shortcomings created risks of unlawful access to personal data and violation of the principles of their protection.

In addition, it was found that Shepetivka City Council, Khmelnytskvodokanal Municipal Utility Company and the Territorial Department of the State Judicial Administration of Ukraine in Khmelnytskyi Oblast failed to notify the Commissioner of the identification of a responsible person or structural unit organising work related to personal data protection during their processing, which is a violation of the law.

Based on the results of the inspections, the heads of state authorities and local self-government bodies were issued 4 orders to eliminate the identified violations. The orders were complied with within the prescribed timeframe, which made it possible to eliminate the violations and bring the activities of the relevant entities into compliance with the requirements of personal data protection legislation.

The results of the inspections indicate that there are systemic organisational and procedural shortcomings in the activities of certain state authorities and local self-government bodies in the field of personal data protection. The main problems remain a formal approach to the legal grounds for processing personal data, inadequate notification of personal data subjects, and the lack of internal mechanisms for organising and monitoring their protection.

Further ensuring an adequate level of personal data protection requires systematic work on the part of public authorities, in particular through the implementation of internal procedures, identification of responsible persons and raising the level of legal awareness of officials in the field of personal data protection.

6. Ensuring equal rights and opportunities and creating a barrier-free environment

As part of the implementation of the state policy in the field of ensuring equal rights and opportunities and creating a barrier-free environment in the territorial communities of Khmelnytskyi region, the regional office carried out systematic work aimed at monitoring and stimulating compliance with the requirements of national legislation and strategic documents.

In the period from July to October 2025, the Regional Office, together with representatives of the public and experts of the Expert Council under the Representative of the Commissioner in Khmelnytskyi region, investigated the state of measures to create

a barrier-free environment in all communities of the region in order to obtain information on the establishment and activities of barrier-free councils provided for in the Action Plan for 2025-2026 for the implementation of the National Strategy for Creating a Barrier-Free Space in Ukraine until 2030.

Based on the results of processing the responses received, it was found that at the time of preparation of the Annual Report, all 60 communities in the region had formally established barrier-free councils, but the level of their actual activity varied significantly. Some communities have ensured the full functioning of such councils, while in a significant number of territorial communities their work remains incomplete due to the lack of responsible persons or approved action plans, and in a separate case, the council was not established at all.

It is worth noting that a significant number of territorial communities intensified their work on establishing barrier-free councils only after receiving a letter from the representative of the Commissioner in Khmelnytskyi region, which is generally assessed as a positive development and indicates the effectiveness of the response to institutional control.

At the same time, it has been established that even in communities where barrier-free councils have been established, their activities are often declarative and not accompanied by effective management decisions, proper planning and personal responsibility. Insufficient interaction between local authorities and civil society organisations and disregard for the real needs of persons with disabilities and low-mobility groups result in the persistence of architectural, informational and social barriers.

RECOMMENDATIONS:

Khmelnyskyi Regional State Administration, Regional Military Administration:

Ensure systematic interagency control over the observance of the rights of servicemen, veterans and their families, in particular with regard to social benefits, access to various types of services and proper performance of their duties by specialists in supporting war veterans and demobilised persons in the communities of the region;

to ensure that regional municipal institutions provide barrier-free movement for persons with disabilities and low-mobility groups, as well as barrier-free access to and use of sanitation and hygiene facilities or their reasonable adaptation;

to ensure that the living conditions of internally displaced persons are brought in line with the minimum requirements of the ICC Functioning Procedure approved by the Cabinet of Ministers of Ukraine dated 01.09.2023 No. 930;

ensure that owners/balance holders take measures to bring civil protection facilities in line with the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09 July 2018.

Local self-government bodies:

Ensure barrier-free and accessible premises in local community institutions for people with disabilities and low-mobility groups by taking effective measures (approval and implementation of relevant action plans, identification of responsible persons);

ensure that the information provided for by the Law of Ukraine "On Access to Public Information" is published on official websites and that the right to submit an oral appeal is exercised, in particular by calling the contact number published on the official website;

to ensure control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans;

to intensify work on the creation of family-based forms of education in each territorial community as a priority model for the protection of children's rights;

to ensure that temporary accommodation for IDPs is brought in line with established standards and that a fund of housing for temporary accommodation is formed, including proper consideration of needs;

to implement internal procedures for organising work with personal data and control over their protection, to identify a responsible person who organises work related to the protection of personal data during their processing.

11.22. Cherkasy Region

During the period from 01 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **4,648** appeals from Cherkasy region, containing **5,551** reports of alleged violations of human and civil rights. The most frequently mentioned human rights violations in the appeals were: civil rights - **4,131**, social rights - **257**, economic rights - **183**, and children's rights - **165**.

The number of	2022	2023	2024	2025
Citizens' appeals	922	2 686	4 082	4 648

Reports of rights violations	1193	3 136	4 624	5 551

Cherkasy region is located in the central part of Ukraine and is important for ensuring the stable functioning of the country's transport, economic and social infrastructure. In the context of martial law, special attention is required to ensure the safety of critical infrastructure and support the vital functions of communities.

Although no active hostilities are taking place in the region, the consequences of the armed aggression of the Russian Federation against Ukraine affect the social sphere and the enjoyment of human rights. The issues of support for servicemen, veterans, their families, as well as the families of the deceased and missing persons.

In addition, the region has received a significant number of internally displaced persons, which has created an additional burden on the social protection, education, healthcare and housing systems. In these circumstances, it is important to ensure access to basic services and strengthen support for vulnerable categories of citizens.

Monitoring visits/on-site inspections

In 2025, the team of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Cherkasy region conducted **148** monitoring visits. In particular, **15** monitoring visits were carried out in the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention.

In 2025, **14** monitoring visits were conducted in the area of child protection. Attention was focused on ensuring the safety of children during the educational process in the context of martial law.

In order to determine the state of equal rights and freedoms, in particular the accessibility of social infrastructure facilities in Cherkasy region, the team of the Representative Office conducted **one** monitoring visit to a healthcare facility in Cherkasy, where accessibility for people with reduced mobility was analysed.

The work in the field of protection of the rights of persons affected by the armed aggression against Ukraine remains an important area of activity of the team of the Mission in Cherkasy region. In 2025, **112** monitoring visits were carried out to protect the rights of persons affected by the armed aggression against Ukraine, including **61** temporary residence places to monitor the rights of internally displaced persons, and **5**

monitoring visits to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine". Also, in order to ensure the right to protection of the population during an air raid or other threat to life, **46** monitoring visits were made to the facilities of the fund of protective structures (shelters) in Cherkasy region.

In the field of information rights protection, the team of the Representative Office conducted **6** on-site inspections, which focused on the observance of the right to apply for and access to public information, and protection of personal data.

Educational activities

In order to raise public awareness of human rights protection, the Ombudsman's Office in Cherkasy region held **127** information events in 2025. Among them were **48** awareness-raising events for representatives of state authorities, local self-government bodies and employees of the National Police, attended by **1,732** people, and **3** trainings were organised and held on the occasion of the Day of Social Workers, attended by **73** people.

Seven educational events were held for the community of internally displaced persons, with **104** people attending.

In addition, **22** educational events were held for citizens registered with the Cherkasy City Employment Centre, with **373** people participating in these events.

In 2025, **30** legal education events for children were also held to raise legal awareness, develop safe behaviour skills and make children aware of their rights and mechanisms for protecting them. The events were attended by **436** children.

During the year, on-site receptions of citizens were held in **17** territorial communities of the region. Communication with community leaders and residents, as well as personal receptions of citizens, made it possible to directly study problematic issues and the real state of affairs on the ground, to hear people's requests and needs. Such visits became an important tool for open dialogue, which allowed us to respond promptly to pressing issues, establish constructive cooperation with local authorities and develop practical ways to resolve them in order to protect the rights and legitimate interests of the region's residents.

Main issues addressed by the Ombudsman's office:

Among the main 9 areas of work of the Ombudsperson's Office in Cherkasy region, a special place is occupied by issues that required settlement and special attention at the local level. Among the main problematic issues that the team of the Regional Office in Cherkasy region worked with were

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of children's rights;
- protection of information rights.

1. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing under special circumstances

In 2025, the Ombudsperson's Office carried out systematic work to protect the rights of servicemen, veterans and their families, as well as families of servicemen held in Russian captivity or missing under special circumstances. Since 1 May 2025, the Regional Working Group of the Coordination Headquarters for the Treatment of Prisoners of War (hereinafter referred to as the RWG POW) in Cherkasy region has been operating on the basis of the Mission, which aims to ensure proper coordination, legal and informational support for such families.

Since the beginning of the work of the PWG in Cherkasy region, **15** on-site meetings have been held with families of prisoners of war and those who went missing under special circumstances, with **1,451** families participating.

During these meetings, issues were raised regarding the timing and mechanisms for the exchange of prisoners of war, the algorithm of actions in the event of a serviceman going missing under special circumstances, establishing communication with the command of military units, pre-trial investigation bodies, and obtaining procedural documents.

At the same time, during the reporting period, the Cherkasy Regional Task Force, under the leadership of the Commissioner's representative in Cherkasy region, ensured: organisation of personal reception of citizens and on-site meetings with families in communities, information and legal support of cases of violation of the rights of defenders of Ukraine, coordination of activities of regional units of executive authorities, local self-government and military formations, informing the public about the activities of the Cherkasy Regional Task Force, interaction with public associations, etc.

During the period from 1 May to 31 December 2025, **487** appeals were processed in person, and assistance was provided in creating **93** personal accounts on the website of the Coordination Headquarters for the Treatment of Prisoners of War. The Ombudsman's representative personally received **326** citizens.

Many of the issues raised were related to clarification of certain aspects, namely: the timing and mechanisms of exchanges, the algorithm of actions in case of missing persons, communication with the command and investigative bodies. The low level of awareness of families, lack of communication and untimely provision of procedural documents remain a problem.

2. Protection of the rights of victims of armed aggression against Ukraine

The protection of the rights of persons affected by the armed aggression against Ukraine remains an important area of activity of the Cherkasy region.

As of 31 December 2025, **140,009** internally displaced persons were registered with the social security authorities, most of whom live in the private sector.

In Cherkasy region, **38** temporary accommodation places for internally displaced persons have been arranged. In 2025, **61** monitoring visits were conducted to check the living conditions of IDPs at the ICC and other places of accommodation of IDPs that were not included in the official list of places of temporary residence of internally displaced persons in Cherkasy region, and **108** recommendations were made to the Cherkasy Regional State Administration and the Regional Military Administration to address the identified shortcomings. Of these, **78** were implemented, **22** were in the process of being implemented, and **8** were not implemented.

The monitoring visits revealed a number of typical shortcomings in the functioning of the places of residence of internally displaced persons: showers are not equipped with separate doors or screens to ensure the right to privacy of residents of the above dormitory; the main entrance of the above dormitory is not equipped with a ramp or appropriate side holders; there is a need to repair bathrooms; there is a need to disinfect residential and common areas of the above dormitory.

During a routine monitoring of the observance of the rights of internally displaced persons in the MCC on the basis of the municipal non-profit enterprise "Cherkasy Regional Children's Multidisciplinary Sanatorium "Sosnovyi Bor" of the Cherkasy Regional Council", where 64 IDPs live, it was found that the central entrance to one of the residential buildings is not equipped with a ramp, and in another residential building the electrical network is in an emergency state and needs to be replaced.

Based on the results of the monitoring visit, a report with recommendations was drawn up and sent to the Cherkasy Regional Military Administration to eliminate the violations.

Pursuant to the recommendations, the Cherkasy Regional Military Administration eliminated the identified shortcomings in full, namely: the electrical

network was completely replaced with a new one in the ICC residential building; a ramp was installed at the main entrance of another ICC residential building.

Also, during some monitoring visits, cases of untimely provision of solid fuel by local authorities to places of temporary residence of internally displaced persons were recorded.

Provision of the places of temporary residence with the necessary stock of solid fuel (firewood) should be carried out in advance, before the start of the heating season, with to guarantee proper living conditions and uninterrupted heat supply in the autumn and winter.

During the monitoring visit to the place of temporary residence of IDPs at dormitory No. 2 of the separate structural unit "Chyhyryn Economic and Legal College of Uman National University", it was found that the institution had not prepared solid fuel (firewood) to ensure proper heating of the dormitory during the heating season, which created risks of inadequate temperature control in the premises.

Based on the results of the monitoring visit, a report with relevant recommendations was drawn up and sent to the Chyhyryn City Council of Cherkasy District, Cherkasy Oblast.

In order to implement the recommendations, the Chyhyryn City Council of Cherkasy District, Cherkasy Oblast, provided the dormitory with solid fuel (firewood) in the required quantity for the heating season.

In addition, in order to ensure the right to protection of the population in case of air alert or other threat to life, **46** monitoring visits to the **facilities of the fund of protective structures (shelters)** were carried out in 2025, which resulted in **127** recommendations to local governments to address the identified shortcomings. Of these, **102** were implemented, **23** are in progress, and **2** have not been implemented.

The monitoring identified a number of problems that affect the proper readiness of shelters for use by the public in emergencies. In particular, some shelters lack the necessary stocks of long-term storage food and non-food items for children, and some facilities are not equipped with first aid kits and supplies of technical and drinking water. There were also violations of accessibility requirements for people with reduced mobility, as the entrances to some shelters are not equipped with ramps or side holders. In addition, the absence of directional signs to the shelters was found, which can make it difficult for people to find them in a timely manner in case of a threat.

In October 2025, a monitoring visit was carried out to a civilian shelter facility in the basement of the Zolotonosha secondary school in Cherkasy region (Shelter No. 1). During the visit, it was found that the shelter is not provided with long-term storage food; non-food items for children (toys, blankets, hygiene products); uninterruptible power supply devices.

Based on the results of the monitoring visit, a report with recommendations was drawn up and sent to the Zolotonosha City Council of Cherkasy Oblast for implementation.

Based on the results of the measures taken, the Zolotonosha City Council of Cherkasy region informed that the basement of the Zolotonosha secondary school in Cherkasy region (shelter No. 1) was provided with long-term storage food; non-food items for children (toys, blankets, hygiene products); and uninterruptible power supply devices.

In 2025, in order to ensure the right of IDPs to education, **5** monitoring visits were conducted to the educational centres "Crimea - Ukraine" and "Donbas - Ukraine" located in Cherkasy region. Based on the results of the visits, **13** recommendations were provided to the educational institutions to eliminate the identified shortcomings. Of these, **12** have been implemented and **1** is in the process of being implemented.

3. Protection of children's rights

In 2025, **14** monitoring visits were carried out in the area of child protection: to children's services, general secondary education institutions, and centres for social and psychological rehabilitation of children.

During the monitoring visits, violations were most often identified in relation to the organisation of safe and decent living and learning conditions for children, barrier-free access, ensuring the exercise of the child's right to privacy, access to information, adequate and safe nutrition, and quality medical services.

Violations of children's right to life and safety were recorded in general secondary education and institutional facilities. The condition of the shelters used to protect students and staff, as well as to ensure the continuity of the educational process during air alert, does not fully meet the requirements for the maintenance and operation of civil protection facilities. The entrances to the shelters in the vast majority of the schools visited are not equipped with ramps, wooden or metal ladders, and there are no specially equipped sanitary facilities, which makes it impossible for persons with disabilities to use them. The shelters of most of the facilities lack sufficient drinking water tanks, long-term food supplies and first aid equipment.

In some of the visited schools and shelters, fire alarms were found to be absent, which is a violation of fire safety regulations.

During the monitoring visits, it was also established that the territory of some of the visited educational institutions is not fenced or the fence is not intact, thus, the schools are not protected from unauthorised persons entering its territory.

The monitoring group found cases of the use of sports grounds with traumatic surfaces and outdated sports and physical education facilities in educational institutions, which can lead to injuries to students.

In addition, a number of violations of children's rights to proper and decent learning conditions have been recorded in general secondary education institutions.

During the monitoring visit to the Dmytrushkyi Lyceum of the Dmytrushkyi Village Council of the Uman District, violations of the requirements of paragraph 31 of Section III of the Sanitary Regulations on the arrangement of sanitary facilities in educational institutions were recorded, in particular there are no doors in the toilet cubicles for students, which is unacceptable in terms of privacy and compliance with sanitary and hygienic requirements; three sanitary facilities lack hot running water; the equipment of the sanitary facilities in the institution is outdated, in need of repair and renewal.

Based on the results of the monitoring visit, a report was sent to the head of the Dmytrushky village council and the director of the Dmytrushky lyceum with the violations and a request to eliminate them.

As a result of the measures taken, a number of shortcomings were eliminated, including the purchase of electric taps with heated water and materials for the manufacture of doors to the stalls in the lyceum's sanitary facilities.

In addition, according to the director of the educational institution, the Development Strategy of the Dmytrushkyi Lyceum for 2026-2027 includes the overhaul of the lyceum's sanitary facilities, which is planned to be funded by the Dmytrushkyi village council in 2026.

Another systemic violation in general secondary education institutions is the violation of a child's right to receive quality medical services, including violations of the shelf life of medicines.

During the monitoring visit to Korsun-Shevchenkivska Gymnasium No. 2 with the primary school of the Korsun-Shevchenkivska City Council of Cherkasy District (hereinafter - Gymnasium No. 2), expired medicines were found in the medical office that had not been withdrawn from circulation, which is a violation of the Law of Ukraine "On Medicines", paragraphs 5, 6 of Section II of the Rules for the Utilisation and Destruction of Medicines, approved by Order of the Ministry of Health of Ukraine No. 242 of 24 April 2015.

Based on the results of the monitoring visit, a report was sent to the Head of Korsun-Shevchenkivske City Council and the Director of Gymnasium No. 2 with the violations recorded and the requirement to eliminate them.

As a result of the measures taken, the city council reported that the expired medicines had been withdrawn.

Also, during the monitoring visits, individual cases of violation of children's right to protection and non-disclosure of their personal data were identified, which was manifested, in particular, in improper handling of information that allows identifying a child and its dissemination without complying with the requirements of the legislation on personal data protection.

When analysing information published on the website of Uman Primary School No. 2 of the Uman City Council, the monitoring group found violations of children's rights to non-disclosure of their personal data.

Thus, in accordance with paragraph 4 of Chapter 1, Section II of the Procedure for Enrolment, Expulsion and Transfer of Pupils to State and Communal Educational Institutions for Complete General Secondary Education, approved by the Order of the Ministry of Education and Science of Ukraine of 16.04.2018 No. 367 (hereinafter - the Enrolment Procedure), the educational institution is required to publish a list of enrolled pupils with only their surnames in compliance with the requirements of the Law of Ukraine "On Personal Data Protection".

However, the institution's website published an order on enrolment of pupils in the first grade dated 20.08.2025 No. 124/01-07, which included the surnames, names and patronymics, as well as the dates of birth of pupils, which is a violation of children's rights to non-disclosure of their personal data.

Based on the results of the monitoring visit, a report was sent to the director of Uman Primary School No. 2 of the Uman City Council with the violations recorded and a request to eliminate them.

In compliance with the requirements, Uman Primary School No. 2 of the Uman City Council reported that the identified violations had been eliminated: personal

data of students were removed from the school's website.

Violations were also identified in the activities of local authorities and children's services to protect children's rights, namely: inconsistency of the structure and actual number of employees of children's services with the requirements of the law; improper maintenance of personal files of orphans and children deprived of parental care who are registered; failure to fulfil the obligations established by law to monitor the living conditions and maintenance of adopted children; violation of the requirements of the law on the protection of housing and property rights of orphans and children deprived of parental care.

Based on the results of the monitoring visits, **186** recommendations were made to the authorities, local self-government bodies, institutions and educational establishments aimed at improving the observance of children's rights. Of the recommendations made, **102** were implemented, **38** are in the process of being implemented, and **46** were not implemented.

4. Protection of information rights

The problem of violations of information rights remains important, especially under martial law. Widespread violations include restrictions on access to information, failure to respond to requests, and the absence of mandatory data on the websites of information holders.

In 2025, the team of the Ombudsman's Office in Cherkasy region conducted on-site inspections of the websites of state bodies, local governments, educational institutions, and municipal institutions/agencies to ensure compliance with the citizens' right to information. Systemic problems include partial or complete absence of information materials on adopted decisions and regulatory acts, as well as outdated contacts for communication with relevant structural units. In addition, the websites do not always contain reports on the fulfilment of requests for public information and information on the procedure for personal reception of citizens by officials.

Thus, in 2025, the team of the Commissioner's Office conducted **6** on-site inspections of the websites of information managers and checks of compliance with the legislation on the protection of personal data by personal data owners. The results revealed a number of violations that are typical for information managers.

Of the **30** recommendations provided, **27** have been implemented **and 3** are in the process of being implemented.

In terms of general violations of the right to appeal, the following were recorded: lack of information on the institution's working hours; lack of possibility to submit an

electronic appeal via the Internet, electronic communication means, or mailbox; lack of information on the hotline telephone number and working hours; lack of a schedule for personal reception of citizens; and inadequate contact telephone number for making an appointment.

During the inspection of the official website of the Zvenyhorod District State Administration (hereinafter - the administration), violations were found regarding the observance of citizens' rights to appeal and access to public information.

It was found that the administration had identified the grounds for refusing to make an appointment for a personal reception of citizens, which contradicts Article 22 of the Law of Ukraine "On Citizens' Appeals". It was also noted that there was no information on the procedure for appealing decisions, mechanisms for representing the interests of the public and reports on the consideration of information requests, which is a violation of the Law of Ukraine "On Access to Public Information".

Based on the results of the audit, a report describing the violations was drawn up and sent to the audited entity with a request to eliminate the violations. As a result of the measures taken, the identified deficiencies were eliminated, and the website was brought into compliance with the requirements of the current legislation.

Regarding general violations of the Law of Ukraine "On Access to Public Information": there is no information on the procedure and conditions of the competition for vacant positions; information on the organisational structure, mission, functions, powers, main tasks, areas of activity and financial resources (structure and amount of budget funds, procedure and mechanism of their spending, structure, principles of formation and amount of remuneration), regulations related to the activities of the local self-government body; no information on the

The Ombudsman was approached by citizen A. regarding alleged violation of the Law of Ukraine "On Access to Public Information" by officials of Chyhyryn City Council, namely, failure to provide information upon request.

The Chyhyryn City Council was repeatedly sent relevant letters explaining the provisions of the Law of Ukraine "On Access to Public Information" and demanding to reconsider the applicant's information request. All letters from the Commissioner's representative were ignored, Chyhyryn City Council refused to reconsider the applicant's request, even with the explanations provided on the requirements of the Law of Ukraine "On Access to Public Information".

Employees of the Ombudsman's Secretariat drew up a report on an administrative offence under Article 188⁽⁴⁰⁾ of the Code of Ukraine on Administrative

Offences for failure to comply with the legal requirements of the representative of the Ukrainian Parliament Commissioner for Human Rights.

Based on the results of the court review of the administrative protocol, the Chyhyryn District Court found the Mayor of the Chyhyryn City Council guilty of committing an administrative offence under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences and imposed an administrative penalty in the form of a fine.

With regard to general violations of the Law of Ukraine "On Personal Data Protection": there is no or an outdated procedure for processing personal data; there are no grounds for processing personal data, namely: with the consent of the personal data subject; there are no obligations on non-disclosure of personal data, employees who have access to personal data; the procedure for keeping records of operations related to the processing of personal data of the subject and access to them is not defined; the method of destruction/deletion of personal data and the time limit for their destruction/deletion are not defined.

The systemic violations in the field of information rights protection identified during the year underscore the need to improve the work of the authorities to create a more transparent and accessible information environment for citizens.

RECOMMENDATIONS:

Cherkasy Regional State Administration, Regional Military Administration:

arrange/refurbish shelters on the territory of the region for the civilian population and exercise constant control over the free access of citizens to them;

ensure architectural accessibility of municipal and state-owned institutions for persons with disabilities;

ensure the publication of public information on official websites and strengthen control over compliance with the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals".

To local self-government bodies:

Ensure the publication of public information on the official websites of territorial communities and strengthen control over compliance with the requirements of the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals";

to ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals, taking into account the conditions of martial law (personal reception by video conference, in safe spaces, etc;)

to provide places of temporary residence (accommodation) with the necessary supply of solid fuel before the start of the heating season;

strengthen control over compliance with the requirements of the Law of Ukraine "On Personal Data Protection" on the official websites of educational institutions;

to strengthen control over compliance with the Law of Ukraine "On Medicines" and the Rules for the Utilisation and Destruction of Medicines, approved by the Order of the Ministry of Health of Ukraine of 24 April 2015 No. 242, in educational institutions.

11.23. Chernivtsi Region

Chernivtsi region borders Romania to the south and Moldova to the south-east. There are 6 international border crossing points in the region: 3 with Romania and 3 with Moldova.

The Chernivtsi region, which includes 3 rayons and 52 territorial communities, belongs to the Carpathian region, which unites four regions of Ukraine. Within this region, 715 settlements have the status of mountainous, of which 64 are located in the Chernivtsi region, which is about 9% of their total number. The vast majority of such settlements are located in Vyzhnytsia district (62), while 2 more are in Chernivtsi district. As a rear region, Bukovyna continues to be a safe haven for 74.1 thousand IDPs and relocated businesses. The regional economy, along with local businesses, is supported by about 82 relocated enterprises, 43 of which have re-registered in Chernivtsi region. The ethnic composition of the region's population remains multinational: Ukrainians - 75.0%, Romanians - 12.5%, and Moldovans - 7.3%. Smaller nationalities living in the region include Jews (0.2%) and Poles (0.4%).

During the period from 1 January 2025 to 31 December 2025, the Ukrainian Parliament Commissioner for Human Rights received **2,551** appeals from Chernivtsi region, which contained **2,952** reports of violations of human and civil rights. Most appeals and reports concerned human rights violations in the field of civil rights - **2,143** reports, social rights - **203** reports, and economic rights - **138** reports.

The number of	2022	2023	2024	2025
Citizens' appeals	524	1253	2511	2551

Reports of rights violations	625	1	2	
		514	818	2 952

As a result of consideration of appeals, **6** reports on administrative offences were drawn up: **5** - under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences (failure to comply with legal requirements of the Ukrainian Parliament Commissioner for Human Rights) and **1** - under Article 212⁽³⁾ of the Code of Administrative Offences (violation of the right to information and the right to appeal).

The Ombudsman made **14** submissions in connection with gross violations of human rights by state authorities, local self-government bodies, institutions, organisations and enterprises. There were **6** submissions to institutional care facilities, general secondary education, children's services, **6** to the Chernivtsi Regional State Administration, **6** to local authorities, and **2** to district courts.

As part of the Ombudsman's response to the media monitoring and citizens' appeals, **7** officials were brought to disciplinary responsibility: employees of the Municipal Enterprise "ChernivtsiVodokanal" and Putyla Village Council; director of the Zamostyanske Secondary School of I-III degrees of the Vashkivtsi City Council of the Vyzhnytsia District of Chernivtsi Region; head and deputy head of the Department No. 2 (Kitsman) of the Main Department of the National Police in Chernivtsi Region; two servicemen of the Dnistrovskiy District Military Training and Detachment Centre.

As part of the monitoring of the observance of the right of the child to education, the father of a student of Khotyn Lyceum No. 5 was brought to administrative responsibility under Article 184 of the Code of Administrative Offences for failure to fulfil child-rearing responsibilities by parents or persons in loco parentis.

Additionally, the Ombudsman and his representative in the region initiated **3** criminal proceedings on the fact of alleged violation of children's rights. At the same time, a criminal case was opened for obstructing the activities of the representative during the monitoring under Part 2 of Article 344 of the Criminal Code of Ukraine.

Monitoring visits/on-site inspections

One of the activities of the Office of the Ukrainian Parliamentary Commissioner for Human Rights in Chernivtsi region is monitoring of observance of human and civil rights and freedoms by state authorities, local self-government bodies, institutions, organisations and other subjects of relations.

The team of the Office carried out **204** monitoring visits, including **168** on-site and **36 off-site** visits, and **14** unscheduled visits. In the areas of observance of the rights of internally displaced persons, **51** visits were conducted, including **49** to places of temporary residence and **2** visits to the educational centres "Donbas-Ukraine" and "Crimea-Ukraine", observance of children's rights - **38** monitoring visits, **22** visits to places of detention as part of the National Preventive Mechanism, and **35** monitoring visits to civil protection facilities, observance of the right to apply for and access to public information - **31** on-site inspections and **5** inspections of compliance with legislation on personal data protection, observance of the rights of national minorities (communities) - **11** monitoring, to ensure equal rights and freedoms in terms of architectural accessibility

- 5 monitoring, observance of the right to justice - 5 monitoring observations, 1 monitoring in the area of observance of social and economic rights.

Educational activities

To raise the level of legal awareness of the population and foster a culture of respect for human and civil rights and freedoms, the Representative Office carried out **85** legal education events.

An important part of the work was initiatives aimed at fostering legal culture from an early age and ensuring the sustainability of human rights practices.

For the second year in a row, the **School Ombudsman** project was implemented in the region, covering **290** schools in the region. The initiative was expanded to **15** vocational education institutions, resulting in the election of **15 Student Ombudsmen**.

As part of the celebration of the Children's Day, for the first time the Ombudsperson's Office in Chernivtsi region organised a regional essay contest "I want to be heard", which became a platform for public dialogue and reflection on topical issues of child rights protection, and for the third time held a regional children's drawing contest "I have the right...". The winner's work, together with information on the mechanism of appeal to the Ombudsman, was printed on a limited edition of notebooks.

The Representative Office launched new initiatives: the legal platform "Child. Family. The Law" legal platform aimed at providing information, legal and advisory support to families of children with disabilities, cross-sectoral cooperation and development of systemic solutions in the field of child rights protection, and legal education sections for residents of the region on the official Facebook page of the Office: "Human rights from A to Z", "I know how to act" and "Question and answer with a representative".

The main issues addressed by the Ombudsman's Office:

Among the main areas of work of the Ombudsperson's Office in Chernivtsi region, a special place is occupied by issues that required settlement and special attention at the local level. Among the main problematic issues that the team of the Regional Office in Chernivtsi region worked with were

- protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen held in Russian captivity or missing in action under special circumstances
- protection of children's rights;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of the right to life and security under martial law;
- protection of information rights of citizens.

1. Protection of the rights of servicemen, veterans, persons liable for military service, and families of servicemen held in Russian captivity or missing in action under special circumstances

In the context of martial law, one of the priority areas of activity is to ensure the exercise of the rights of persons missing under special circumstances and their families. In order to ensure equal access of the families of the defenders of Ukraine to the Consultation Centre of the Coordination Headquarters on the treatment of prisoners of war and to fulfil certain tasks of the Coordination Headquarters, on 1 May 2025, at the initiative of the Commissioner, **the Regional Working Group of the Coordination Headquarters on the treatment of prisoners of war** (hereinafter - RWG POW) in Chernivtsi region was launched at on the basis of the Human Rights Protection Centre in Chernivtsi region.

The work of the RWG POWs has become systematic in the activities of the office due to the introduction of a weekly schedule of individual appointments and group meetings with families of defenders with the participation of relevant specialists - members of the RWG POWs.

During the reporting period, the HRWG under the leadership of the Commissioner's representative in Chernivtsi region ensured: organisation of personal reception of citizens and on-site meetings with families in communities, information and legal support of cases of violation of the rights of defenders of Ukraine, coordination of activities of regional units of executive authorities, local self-government and military formations, informing the public about the activities of the HRWG, interaction with public associations, etc.

During the period from 1 May to 31 December 2025, **652 citizens'** appeals were processed in person, **238 written applications** were accepted, **265 citizens** were consulted and **87 personal accounts** were registered.

A significant number of requests were related to clarification of specific issues: the algorithm for searching for a missing serviceman; the procedure for conducting a portrait examination of a serviceman; interaction with the TCC and JV, police, local authorities; processing social benefits; interaction with communities regarding local assistance; security measures when working with information posted on social media; procedures for returning deceased servicemen and their identification.

As part of the work of the OWG, during individual meetings with families of servicemen, systematic cases were identified where official notifications to family members of missing servicemen did not contain information about the number of the military unit in which the serviceman served.

This restricted the families' right to receive full information and complicated the further exercise of their socio-economic rights. In order to restore the violated right to information, a letter was sent to the Chernivtsi JTCC and JV with an explanation of the need to indicate the number of the military unit in the notifications, and response letters were sent as part of the consideration of individual appeals.

As a result of the measures taken, the Chernivtsi JCCC restored the right of 5 families to information on the number of the military unit in which the missing serviceman

served and subsequently eliminated the relevant violation in the notifications to the families.

In the course of performing the main tasks assigned to the CWG, **19** meetings were held with the families of Ukraine's defenders, which covered **992** representatives of the families of prisoners of war and those who went missing under special circumstances. Representatives of the relevant military units, state and local authorities, and veterans' support specialists were involved in each meeting at .

The most pressing issues for the families that needed to be addressed and clarified were: failure to provide information and documents by the TCC and JIC, military units regarding the official investigation into the disappearance of a serviceman; lack of information in notifications to the families of servicemen about the military unit where the serviceman was registered; difficulties in registering a personal account and entering information into it; the procedure for transferring criminal cases to investigators working in the region where the families of the missing reside

An important component of ensuring the rights of family members of prisoners of war and missing servicemen is the proper exercise of powers by local government officials.

A specialist in support of veterans of the Volokiv territorial community appealed to the Ombudsman's representative in the interests of a child deprived of parental care in connection with the receipt of a notification about the disappearance of the girl's father under special circumstances.

The Ombudsman's representative provided the necessary explanations to the veterans' support specialist of the Volokiv territorial community and the director of the Orsha Sanatorium-type orphanage, who is the girl's guardian, on taking appropriate measures to ensure the best interests of the child in terms of receiving social benefits provided for by law.

As a result of the measures taken and proper cooperation, the right of a child deprived of parental care to receive a payment of UAH 2 million as a family member of a person who went missing during a military mission was restored.

On a regular basis, the Mission monitored compliance with legal requirements and human rights during mobilisation activities.

Special attention was paid to the observance of the rights of clergy. To this end, the Ombudsman's representative held a working meeting with religious leaders of the region with the participation of representatives of the Chernivtsi UCC and JV, during which they explained the peculiarities of mobilisation and the procedure for booking religious leaders. This format of dialogue helped to establish open communication between the parties and reduce social tension.

At the same time, in the event of media reports indicating alleged human rights violations by the CCC and JV employees or law enforcement agencies, immediate response measures were taken within the Ombudsman's mandate.

It became known from open sources that the employees of the Dniester district TCC and JV in the Sokyryanska community of the Dniester district allegedly took unlawful actions against a paediatrician of a local hospital in order to mobilise him. In order to clarify the circumstances and conduct an independent official inspection of the actions of the officials of the relevant TCC and JV, the representative of the Commissioner in Chernivtsi region sent a response letter to the Chernivtsi Zonal Department of the Military Law Enforcement Service.

As a result of the response, it was established that the officials of the Dniester District TCC and JV had violated the Law of Ukraine "On Mobilisation Preparation and Mobilisation"; the officials who committed the violation were brought to administrative responsibility; the right of a citizen to deferment from mobilisation was restored.

During the reporting period, the office received 7 reports and appeals concerning the facts of non-admission and obstruction of the advocates' activities by the TCC and JV employees. To resolve this violation, the Commissioner's representative organised a working meeting with the participation of the management of the Chernivtsi SLC and JV, the specialised and regional prosecutor's offices, patrol police, the Main Department of the National Police in Chernivtsi region, the Chernivtsi Zonal Department of the High Specialized Court, the Bar Council of Chernivtsi region and lawyers of the Western Interregional Centre for Free Legal Aid. The issue was considered at the meeting of the Expert Council under the representative of the Commissioner in Chernivtsi region, which resulted in the arrangement of places for confidential meetings between lawyers and clients and access to TCC and JV.

2. Protection of children's rights

In order to properly exercise parliamentary control over the observance of children's constitutional rights and freedoms, the Ombudsperson's Office in Chernivtsi region conducted **38** monitoring visits to **20** educational institutions, **8** children's services, **4** centres for social and psychological rehabilitation of children, **2** children's health and recreation facilities, **1** orphanage, **1** medical rehabilitation centre, **1** police station and **1** local government body, including **15** unscheduled visits in response to violations of children's rights revealed in the media.

In view of the identified grave violations of children's rights, the Ombudsperson submitted **5** submissions to state and local authorities for urgent response measures.

The monitoring of educational institutions in the region revealed typical violations in the organisation of the educational process: untimely response to cases of violence against children; failure to provide children with full general secondary education; lack of local acts regulating the prevention of, and response to, violence and cruelty against children; insufficient organisation of social and pedagogical patronage and psychological services; prescription of treatment for children by a doctor or nurse of an educational institution without a relevant licence; lack of

As a result of the monitoring visits, **392** recommendations were made to the authorities, local self-government bodies, institutions and educational establishments

aimed at improving the observance of children's rights, of which **310 have** been implemented, **43** are in the process of being implemented.

2.1 Protection of children from all forms of violence

Ensuring the child's right to protection from all forms of violence, cruel treatment and humiliation remains one of the key areas of parliamentary oversight in the field of human rights.

The monitoring of the observance of children's rights, carried out by the Ombudsperson's Office in Chernivtsi region, showed the existence of systemic problems in the activities of actors responsible for preventing and combating violence against children. These include a formal approach to responding to reports of violence, inadequate performance of duties by the administrations of educational institutions, lack of effective interagency cooperation between law enforcement agencies, children's services, educational institutions and other actors, as well as untimely adoption of safety measures in the interests of the child.

During the monitoring of social media, the Office discovered the fact that a student of the Zamostyansky secondary school was beaten by a classmate. A monitoring visit to the educational institution and the Service for Children of the Vashkivtsi City Council showed a lack of response from the school administration, control over the students' stay during the educational process, systematic work to prevent bullying and violence against children, concealment of the incident and interagency cooperation with the local structural unit of the Main Department of the National Police in Chernivtsi region and the Service for Children.

As a response, the Commissioner made a submission to the founder - Vashkivtsi City Council, which resulted in elimination of violations to create safe conditions for education and upbringing, interagency cooperation, development of the Regulation on combating violence and cruelty to children, and transfer of the offender to external education.

The principal, deputy principals for educational work, a practical psychologist and a social pedagogue, as well as the class teacher of the 11th grade of the Zamostianske secondary school were reprimanded.

The Director of the Chernivtsi Lyceum No. 17 "Uspish" appealed to the Ombudsman and the Service for Children of the Kitsman City Council, Police Department No. 2 (Kitsman) of the Chernivtsi Oblast Main Department of the National Police regarding the alleged commission of domestic violence and cruel treatment of children by their stepfather.

A monitoring visit to the Police Department No. 2 (Kitsman) of the Chernivtsi Oblast Main Department of the National Police revealed gross violations by law enforcement agencies: inadequate response to reports of a criminal offence; failure to register information in the URPTI; failure to notify the Children's Service and to take measures to ensure the safety of children. The Service for Children of the Kitsman City Council did not provide social support to the family.

In order to take safety measures in the interests of children, the representative promptly engaged responders, as a result of which a report of sexual violence against children was received. The Children's Service drew up a Safety Assessment Report for two children, which resulted in their removal from their families to the Centre for Social and Psychological Rehabilitation of Children of the Chernivtsi Regional State Administration.

The Ombudsman sent a response letter to the Office of the Prosecutor General of Ukraine and the Minister of Internal Affairs of Ukraine, which resulted in the opening of 3 criminal proceedings under Article 126⁽¹⁾ of the Criminal Code of Ukraine "Domestic violence", Article 153(4) of the Criminal Code of Ukraine "Sexual violence", Article 408 of the Criminal Code of Ukraine "Desertion". In addition, criminal proceedings have been opened under Article 344 (2) of the Criminal Code of Ukraine "Interference with the activities of a public official" for obstructing the work of a representative during a monitoring visit.

2.2 The right of the child to respect for dignity

The right of a child to respect for his or her dignity is a basic component of the human rights system, guaranteed by the UN Convention on the Rights of the Child, the Constitution of Ukraine and the Laws of Ukraine "On Protection of Childhood" and "On Education", and obliges the state to ensure the right to education in conditions that do not degrade human dignity. Observance of the child's right to dignity in educational institutions involves the creation of safe and appropriate sanitary and hygienic conditions, prevention of degrading treatment and ensuring equal access to basic living conditions during the educational process. The monitoring of educational conditions in the region's educational institutions showed violations of these guarantees due to the improper organisation of the educational process and management decisions by both the founder and administrations of educational institutions.

During the monitoring of educational conditions in 4 general secondary education institutions, gross violations of the rights of participants in the educational process to dignity were identified. In the Krasnoyilsk gymnasium, students used a street toilet due to repair work that began in March 2025 but was suspended due to the start of the new school year. Zamostianske secondary school does not have an indoor toilet. Krasnoilsk Lyceum No. 3 and Khotyn Special School No. 1 used external toilets due to a ban on the use of internal toilets by the administration.

As a result of the Ombudsman's submission and the representative's response, Krasnoilsk Lyceum No. 3 and Khotyn Special School No. 1 provided children with access to indoor toilets.

Based on the recommendations provided, the Krasnoyilivka village council allocated funds from the local budget to the Krasnoyilivka gymnasium in the amount of over UAH 30 thousand to complete the previously suspended repair work. As a result, children have access to indoor toilets.

The administration of the Zamostianske Secondary School has begun preparing documents for the arrangement of an internal toilet in the school premises. In total, the right to dignity was restored to 488 participants in the educational process.

2.3 Children's right to education

A child's right to education is one of the fundamental human rights guaranteed by international and national legal acts. However, there are cases when children do not regularly attend educational institutions without valid reasons due to inadequate performance of parental duties. The realisation of the right to education requires proper registration of school-age children, systematic monitoring of attendance at educational institutions and timely response by authorised bodies in case of detection of facts of prolonged or systematic absence of students without valid reasons.

During the monitoring visit to Khotyn Lyceum No. 5, the fact of systematic absence of student G., who did not start school on 1 September and as of 9 October continued to be absent without a valid reason, was established. The educational institution repeatedly informed the Service for Children of Khotyn City Council about the student's absence, but the latter did not respond.

Based on the results of the visit, the Commissioner's submission was prepared, and the Commissioner's representative sent response letters to the police unit of the Chernivtsi Oblast Main Department of the National Police, the administration of Khotyn Lyceum No. 5 and the Service for Children of Khotyn City Council. As a result, an administrative report was drawn up against the student's father under Article 184 of the Code of Administrative Offences, the case file was sent to the Khotyn District Court for consideration; the student was transferred to an individual form of education. Thus, the child's right to education was restored.

2.4 Ensuring the best interests of the child by the Children's Service

The entity that guarantees comprehensive, timely and priority protection in the best interests of the child is the children's services. However, their activities continue to be critically affected by insufficient staffing, which does not meet the requirements of current legislation. Out of the **6** services visited during the monitoring visits, only one person exercises the powers of a child's counsellor in **4 of them**. The understaffing of the services leads to violations in the organisation of the activities of the Commission for the Protection of Children's Rights, the work of the Interdisciplinary Team for the Organisation of Social Protection of Children; interaction of children's services with educational institutions and law enforcement agencies and complicates the process of early identification of children in difficult life circumstances, social orphanhood, child abuse, and violates the right of children to be brought up in a family environment.

*A monitoring visit to the Centre for Social and Psychological Rehabilitation of Children of the Children's Service of the Chernivtsi Regional Military Administration (hereinafter referred to as the CSPR) revealed that the period of stay of children in the institution exceeded 10-12 months, instead of the maximum period of 9 months, which violated the right of **13** children to be brought up in a family environment.*

The length of stay of children in the relevant category of CSSF depends on the effectiveness of the organisation of the work of the Children's Service at the place of registration, which is obliged to take timely measures to place them in family or other alternative forms of care.

*As a result of the representative's response, the LCC established cooperation with the Rukshyno and Hertsaiv Children's Services in the best interests of children, as a result of which **11** children were placed in family-based care, and measures to find families for **2** children are underway.*

3. Protection of the rights of victims of armed aggression against Ukraine

Chernivtsi region continues to be a safe haven for tens of thousands of our citizens who were forced to flee their homes due to the full-scale armed aggression against Ukraine. In 2025, the team of the Mission met **7** evacuation trains from the territories of active hostilities and provided information support in case of violation of their rights.

According to the data provided by the Chernivtsi Regional Military Administration at the request of the Ombudsman's representative, the total number of internally displaced persons (IDPs) in the region is **74,176**, including **20,233** children, **11,780** people of retirement age, **3,389** people with disabilities, and **196** large families. Out of the total number of IDPs, **2,412** live in places of temporary accommodation (hereinafter referred to as TACs), according to the order of the Chernivtsi Regional Military Administration "On Amendments to the List of Places of Temporary Accommodation in Chernivtsi Region" of 29 July 2025 No. 1029-p, which approved a list of **63** TACs. However, the monitoring team of the Mission, based on the results of its visits in 2025, found a discrepancy in their number and occupancy.

*Based on the results of **49** monitoring visits to the ICCs, a discrepancy with the quantitative approved list was found. In 2 MCCs - Bukovyna Lyceum of Successful Youth and Bethany Evangelical Christian Baptist Church in Khotyn - IDPs had not actually lived there for more than a year, and 2 other MCCs were used for other purposes: The municipal institution "Centre for the provision of social services of Kadubovets village council", which is a social institution for the elderly; Hertsaiivskyi municipal lyceum named after Heorhii Asaki, which is an educational institution with a boarding house providing round-the-clock accommodation for participants of the educational process.*

*In order to respond appropriately, the representative prepared reports with recommendations, held a meeting of the Expert Council under the Commissioner's representative in Chernivtsi region, which resulted in an inventory of ICCs and their logistical support. As a result of the measures taken, the Chernivtsi Regional Administrative Unit, with the approval of the Ministry of Social Policy, Family and Unity of Ukraine, removed **4** ICCs from the list and approved the current list of **59** ICCs in the region.*

Based on the results of **49** monitoring visits, **153** recommendations were provided to Chernivtsi LGA to ensure the minimum living conditions for IDPs, of which **45 have been** implemented, **108** recommendations are in the process of implementation. The analysis of the monitoring results shows typical violations of the minimum requirements for IDPs due to the lack of adequate funding from the state, regional and local budgets. The most problematic issues are the lack of barrier-free access for people with reduced mobility, proper technical and sanitary condition of the ICC, the need for repairs, replacement of plumbing equipment and provision of sufficient household appliances and equipment. Some violations relate to fire safety and the lack of shelters or access to them. There is a lack of proper interagency cooperation between state authorities and local self-government bodies, which makes it difficult to create decent living conditions for IDPs and to fully implement the recommendations of monitoring visits.

*The results of the ICC visit to the Turyatske outpatient clinic of the Hlyboka District Primary Health Care Centre, where **14** people live, including children, the elderly and people with disabilities, revealed critically unsatisfactory living conditions for IDPs. Repeated monitoring showed that the measures to address the violations previously declared by the Chernivtsi ATC and Tarashany village council had not been implemented. There were recorded malfunctioning sanitary systems, roof leaks, lack of information stands, insufficient living space per person and conditions for children's education. The report also found a lack of response from the local government to a collective appeal from the residents of the TAC.*

*As a result of the recommendations provided in the report to the Tarashany village council and the response letter to the Chernivtsi ATC, as well as a working meeting with the community leadership held by the Commissioner's representative, the violations were eliminated: the sewerage network and shower were repaired, plumbing equipment was replaced, information stands were placed and the appeals of the TAC residents were considered. This restored the right of **14 IDPs** to decent living conditions and the right to appeal.*

Cases of individual violations of IDPs' rights also required a separate response from the Ombudsperson. The most frequent complaints included charging additional fees for utilities in the TACs, which is not provided for in the provisions of the concluded accommodation agreements, lack of firewood in the TACs located in rural areas during the heating season, lack of proper social and living conditions and reunification of IDP family members, etc.

During a visit to the residential care unit for permanent or temporary residence "Zatyshok" of the Vynnya Centre for Social Services in Vynnya village, it was established that IDP spouses were separately placed in different social protection institutions, which does not comply with the principle of ensuring the right to family unity and taking into account the best interests of the wards.

In order to restore the family's right to cohabitation, the representative sent letters to the Chernivtsi Regional Military Administration, the Department of Social Protection of the Chernivtsi Regional Military Administration, and the Viknya Village Council demanding that the persons be cohabited in one of the institutional facilities in Chernivtsi region. In addition, an urgent working meeting was held with the leadership of the Department of Social Protection of the Chernivtsi Regional State Administration, the Viknya Village Council, the Main Department of the NSSC in Chernivtsi Region, and the geriatric nursing home to find ways to restore the rights of family members and to establish interagency coordination between state and local authorities.

Based on the results of the measures taken, the Viknya Village Council decided to transfer the man to the institution at his wife's place of residence. This restored the IDP spouses' right to family unity and cohabitation.

At the same time, the analysis of such appeals shows that violations of their rights are not always of the same type and are related to living conditions. In a number of cases, they are combined with problems of access to medical care, proper provision of social services in the ICC, which significantly complicates the mechanisms of restoration of violated rights and requires a systematic approach by state authorities and local self-government bodies.

The Mission carried out a monitoring visit to the municipal institution "Centre for the provision of social services of the Kadubovets village council of the Chernivtsi district of the Chernivtsi region", which operates an inpatient care unit and a MCC. During the monitoring, the attention of the group members was drawn to an elderly IDP woman who was moaning in pain, probably suffering from palliative care and mental illness. At the same time, she was living in the ICC and was not a ward of a municipal institution, and therefore did not receive qualified medical care and social support. Such negligence created a real threat to her life and health.

In order to respond immediately and ensure a comprehensive medical examination and relocation of the woman to an appropriate type of institution, letters were sent to the Chernivtsi Regional Military Administration and the Kadubovets Village Council. As a result, citizen P. was referred to the medical advisory commission of the

Bukovyna Clinical Cancer Centre and relocated to the Chernivtsi Geriatric Nursing Home, thereby restoring her rights to medical care and social protection.

4. Protection of the right to life and security under martial law

The right to security is one of the key issues in the activities of the Ombudsman and his/her offices, especially in the context of martial law. To this end, the Ombudsman's Office in Chernivtsi region conducted **35** monitoring visits to civil protection facilities in Chernivtsi region to assess their suitability for use by the population as simple shelters. Taking into account the identified violations, **183** recommendations were provided to the balance holders, the Main Directorate of the State Emergency Service of Ukraine in Chernivtsi Oblast and Chernivtsi CMA, of which **125** were implemented, **36** were in the process of implementation, and **22** were not implemented.

Monitoring visits to the shelters revealed systemic violations of the requirements of the Order of the Ministry of Internal Affairs of Ukraine of 9 July 2018 No. 579 (as amended) on the maintenance and use of civil protection facilities. Typical violations include: lack of barrier-free access for people with limited mobility; failure to provide basic life support resources, including drinking water, food and first aid kits; insufficient non-food items for children, seats, and sewage tanks.

Given the gross violations identified, the Commissioner made **6** submissions; the issue of the state of the shelters and their actual number was considered at a meeting of the Expert Council under the Commissioner's representative, following which the representative initiated consideration of the submission at a meeting of the regional Commission on Technogenic and Environmental Safety and Emergency Situations (hereinafter referred to as the Commission on Technogenic and Environmental Safety and Emergency Situations). Based on the results of the measures taken and at the time of writing this Annual Report, the Commission instructed the State Emergency Service of Ukraine in Chernivtsi Oblast to conduct additional unscheduled inspections of the readiness of protective structures. Pursuant to the instruction, the relevant additional control measures were taken, which resulted in the fulfilment of the Commissioner's requirements for 4 protective structures. At the same time, recommendations are being implemented in 2 more shelters.

At the same time, the Chernivtsi Regional Military District removed about **200** objects from the map of protective structures that did not actually exist, thereby restoring the right of the region's residents to reliable information.

As of the end of 2025, the official map of protective structures includes **2,493** simple and radiation-proof shelters and shelters.

During the visit to the radiation shelter of the separate structural unit Khotyn Professional College of the Podilskyi State University, the monitoring group recorded a number of violations and shortcomings in the proper operation of the protective structure, including the lack of barrier-free access for persons with disabilities, expired stocks of medicines and drinking water, lack of stocks of technical water, communication equipment and uninterruptible power supply devices. A separate threat to the lives and

health of the participants in the educational process was posed by the unauthorised installation of furnace equipment without the relevant permits, which poses a potential risk of carbon monoxide poisoning.

In order to eliminate the identified violations, the Commissioner made a submission to the Chernivtsi Regional State Administration and the educational institution. As a result of the response, the violations were eliminated in full. Thus, the administration of the educational institution dismantled the furnace equipment, installed a ramp for persons with disabilities, replaced expired medicines, ensured the installation of uninterruptible power supplies and communication equipment, etc.

As a result, the right to safety of about **500** participants of the educational process and residents of Khotyn was restored.

During the "Air Alert" signal, every resident of the region can find the nearest shelter on the map of protective structures posted on the official website of the Chernivtsi Regional Military Administration with a redirect to the "Information System "Accounting and Visualisation of the Civil Protection Facilities Fund" developed by the State Emergency Service of Ukraine. However, the Ombudsman's Office in Chernivtsi region has identified a tendency that the information on protective structures stated on the official website does not correspond to the actual information.

In the shelter on the basis of Krasnoilsk pre-school education institution No. 2, the monitoring group, despite the positive conclusion of the Act of assessment of the object (building, structure, premises) regarding the possibility of its use for sheltering the population as the simplest shelter, found that in fact, in the basement of the educational institution, a food unit is functioning in , and there is no shelter. At the same time, the map of protective structures posted on the official website of the Chernivtsi DMA shows two active shelters at the address of the secondary school No. 2.

In order to ensure children's right to life and safety during the educational process, the Ombudsman made submissions to the Chernivtsi Regional State Administration and the Krasnoilsk Village Council.

As a result of the response, a number of urgent measures were taken: the food unit of the kindergarten No. 2 was moved to another educational institution located nearby, and the shelter in the kindergarten was equipped in accordance with the requirements. The Chernivtsi EMB corrected the information on the map of protective structures and removed one of the protective structures that was actually absent at the address of the institution. As a result, **45** pupils of the secondary school No. 2 are guaranteed the right to a safe educational environment.

5. Protection of citizens' information rights

Ensuring the right of citizens to apply for and receive information is an inherent duty of state authorities, local self-government bodies, institutions and organisations.

During the reporting period, the office conducted **31** on-site inspections of information administrators' websites. The results resulted in **161** recommendations, of

which: **90** were implemented, **47** were in the process of implementation, and **24** were not implemented.

In the course of on-site inspections of compliance with the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information" and during consideration of citizens' appeals, a number of violations were identified that are typical for information administrators. In particular, the subjects of inspections failed to publish: schedules of personal receptions of citizens and hotline numbers; information on the institution's work schedule; the procedure for preparing and submitting requests for information, the procedure for appealing against decisions of the information manager, actions or inaction; the procedure and conditions for holding a competition to fill vacant positions; the list and conditions for obtaining services provided by the local self-government body, forms and samples of documents, rules for filling them out, the location of places where the necessary forms and blanks are provided; lists of

At the request of citizens G. and Z., it was found that the management and structural units of the Chernivtsi regional police had violated the right of residents of the region to a personal reception, arguing that martial law was in force.

In order to eliminate the violations and restore the right to appeal and personal reception, the Ombudsman's representative sent letters with relevant explanations to ensure that the reception was conducted in compliance with the law. Pursuant to Article 40 of the Constitution of Ukraine and Article 22 of the Law of Ukraine "On Citizens' Appeals" and the measures taken, the applicants and residents of the region were ensured the right to apply and receive a personal reception at the Main National Police in Chernivtsi region.

The Ombudsman received an appeal from the applicant P. regarding the failure of the Putyla village council of Vyzhnytsia district to comply with the requirements of Article 15 of the Law of Ukraine "On Access to Public Information" in terms of public information disclosure.

Based on the results of the analysis of the appeal and an on-site inspection of the official website of the local self-government body, it was established that there was no mandatory information to be published, in particular: video recordings of plenary sessions, a list of communal property; a list of contracts concluded by the village council, etc.

In order to respond, the Commissioner's representative sent letters explaining the requirements of the law and demanding to eliminate the violations. As a result, Putyla village council took appropriate measures to publish public information, thus restoring the right to access public information.

RECOMMENDATIONS:

To Chernivtsi Regional State Administration, Regional Military Administration:

ensure compliance with the minimum requirements at the ICC in accordance with the provisions of the CMU Resolution "Some issues of functioning of places of temporary residence of internally displaced persons" of 1 September 2023, No. 930;

to analyse the categories of IDPs living in the ICCs. Provide social support to people with limited mobility, persons with disabilities and single persons;

ensure full implementation of the recommendations provided as a result of monitoring visits to the MCC in 2023-2025;

to hold an interagency meeting with stakeholders in healthcare, education, children's services, and law enforcement agencies to strengthen coordinated action to properly respond to cases of child abuse and domestic violence;

ensure that officials hold personal receptions in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals".

Chernivtsi Regional Council:

to allocate funds in the regional budget to create appropriate living conditions for IDPs at the ICC, as well as to strengthen the material and technical base of subordinate social institutions with round-the-clock accommodation.

To local authorities of Chernivtsi region:

Fill vacancies of veterans' support specialists and ensure their professional development;

bring the number of employees of children's services in line with the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children";

to ensure proper registration and support of active military personnel, their families, families of military personnel who went missing under special circumstances or are in captivity, and veterans;

to ensure the creation of family-based forms of upbringing in order to timely place children in need of family upbringing;

publish information on the websites of information managers in accordance with the requirements of the Law of Ukraine "On Access to Public Information";

to ensure that officials hold personal receptions in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals".

To the Main Department of the National Police in Chernivtsi region:

to conduct training on the procedure for responding to cases of child abuse and organising interagency cooperation with relevant actors.

To the Main Department of the State Emergency Service of Ukraine in Chernivtsi region:

To hold a meeting with the heads of territorial communities to bring the state of operation of protective structures in line with the order of the Ministry of Internal Affairs of Ukraine of 9 July 2018 No. 579.

To the Chernivtsi Regional Territorial Centre for Recruitment and Social Support:

to ensure the right to legal aid for those brought to and detained in the TCC and JCC, in particular, to arrange places for lawyers to work with clients and guarantee unimpeded access to clients.

11.24. Chernihiv Region

In 2025, the Ombudsman's Office in Chernihiv region received **4,061** appeals and **4,762** reports of human and civil rights violations.

Among the most frequently mentioned human rights violations in the reports were: civil rights - **3,177**, social rights - **461**, economic rights - **183**, and children's rights - **274**.

The number of	2022	2023	2024	2025
Citizens' appeals	987	2 378	3 066	4 061
Reports of rights violations	1 301	2 826	3 435	4 762

The geographical location of Chernihiv region, due to the considerable length of the border with the Russian Federation (199 kilometres), creates a constant high level of humanitarian and security risks as a result of armed aggression. Systematic artillery and mortar shelling, the use of guided aerial bombs and UAV attacks, which are particularly intense in the border communities of **Novhorod-Siversk, Semenivka, Snovsk and Horodnyanska**, as well as the ongoing occupation and intense hostilities in the communities of **Chernihiv, Koryukiv, Nizhyn and Pryluky districts** (in particular, Ivanivka, Kyyn, Novobilouska, Mykhailo-Kotsiubynka and Yahidnya communities), have created conditions for large-scale and systemic violations of human and civil rights.

These circumstances have led to violations of a number of fundamental rights, including the right to life, security, housing, health and education, and have increased the vulnerability of certain social groups, especially residents of areas under constant fire.

In 2025, the Human Rights Protection Centre in Chernihiv region was opened on the basis of the Ombudsperson's Office. This is a modern barrier-free space created with the support of international partners. At the Centre, citizens can get help in restoring their violated rights, receive consultations and file an appeal to the Ombudsman in person.

15 response acts were sent to the authorities and local self-government bodies regarding inadequate observance of human rights in residential social care institutions and children:

2 submissions regarding the work of children's institutional institutions (Starobasanska Gymnasium of the Chernihiv Regional Council, Chernihiv Lyceum with enhanced military and physical training);

3 submissions to general education institutions (Komarivskyi Lyceum of Komarivskyi village council, Nizhyn gymnasium No. 1 of Nizhyn city council of Chernihiv oblast, Koropska secondary school named after Taras Shevchenko of Koropskyi village council of Chernihiv oblast);

1 submission to the centre of vocational education (Municipal Institution "Pryluky Ivan Franko Humanitarian and Pedagogical Specialist College" of the Chernihiv Regional Council);

9 submissions based on the results of visits to the national preventive mechanism (Inpatient Care Unit for permanent or temporary residence of the municipal institution "Territorial Centre for Social Services (Provision of Social Services)" Snovsk City Council; Inpatient Care Unit for permanent or temporary residence of the Centre for Social Services of Komariv Village Council; Borznyansky Lyceum of Chernihiv Regional Council; Inpatient Care Unit for permanent or temporary residence of the Centre for Social Services of Parafiyivka Village Council; Liubetsky Psychoneurological Boarding School; Inpatient Care Unit for permanent or temporary residence of the Centre for Social Services of the Municipal Institution "Centre for Social Services").

One report was drawn up on bringing to administrative responsibility the head of the Vysochenske village council of Nizhyn district for failure to comply with the Commissioner's legal requirements under Article 188⁽⁴⁰⁾ of the Code of Administrative Offences.

Monitoring visits/on-site inspections

Monitoring visits are one of the key tools in the activities of the Commissioner's office in Chernihiv region. They provide direct control over the observance of human and civil rights and freedoms.

The team of the Ombudsperson's Office conducted **163** monitoring visits.

In the area of implementation of the functions of the national preventive mechanism and observance of human rights in places of detention, **29** monitoring visits were carried out, in particular to the judiciary and law enforcement agencies, penitentiary institutions, geriatric nursing homes of state and private ownership, psychoneurological

boarding schools, boarding houses, inpatient care units for permanent or temporary residence of the Centres for Social Services in communities.

In the area of child rights protection, **25** monitoring visits were carried out, including to general education institutions, vocational education centres, children's services, institutional care and education facilities, and the Centre for Social and Psychological Rehabilitation of Children.

In the area of protection of the rights of persons affected by the armed aggression against Ukraine and protection of the right to life and security under martial law, **37** monitoring visits were made to civil protection facilities to assess their suitability for use by the population as shelters (basic and radiation shelters). Also visited were places of temporary residence of internally displaced persons and educational centres "Crimea - Ukraine" and "Donbas - Ukraine".

In order to determine the level of equal rights and freedoms, in particular the accessibility of social infrastructure facilities for people with limited mobility, monitoring visits were made **to 1** healthcare facility, **1** vocational education facility and **1** post office of Ukrposhta JSC.

One monitoring was also conducted in the area of observance of social and economic rights.

In the area of information rights protection, **3** on-site inspections were carried out to check the state of observance of the right to apply for and access to public information, as well as **4** inspections in the area of personal data protection.

In the area of protection of procedural rights, **61** monitoring observations of court hearings were carried out during the consideration of criminal proceedings on charges of committing criminal offences at the request of convicted persons (prisoners) for the application of conditional early release, commutation of an unspent part of a sentence, etc. to ensure compliance with the right to a fair trial and procedural rights of participants in the trial.

Eight cluster monitoring visits were conducted to assess the observance of human rights and freedoms and to ensure the practical and strategic needs of different groups of women and men in the field and the observance of citizens' rights in assessing the daily functioning of a person.

The team of the Commissioner's Office in Chernihiv region together with the State Specialized Enterprise "ECOCENTER" participated in the dosimetric certification of the territories of Chernihiv region to assess their current radiation status within the framework of the Cabinet of Ministers of Ukraine Resolution No. 111 of 31.01.2025 on dosimetric certification of the territories contaminated as a result of the Chernobyl accident, which allowed to update the data on the level of contamination and ensure effective environmental monitoring in the affected areas.

Educational activities

The team of the Commissioner's office in Chernihiv region held **3** conferences and **190** awareness-raising events in **45** territorial communities, during which they held working meetings, personal reception and advised citizens on ensuring observance of their information rights, improper consideration of appeals; lack or limited information

and communication sources; insufficient interaction between public authorities and officials, etc.

In particular, **89** awareness-raising events were held for the public and civil servants; **83** for families of prisoners of war, missing persons under special circumstances and affected civilians under martial law; **18** for internally displaced persons in places of temporary residence. The events involved **4,255** people.

For the second year in a row, two thematic educational projects were implemented in the region at the initiative of the Ombudsperson's Office: "Young Human Rights Defender's Studio" for law students and "Educational Space for Older People" in cooperation with the NGO "Chernihiv Women's Union".

In 2025, preparations began for the implementation of the School Ombudsman project, which will involve general secondary education institutions in the region.

The main issues addressed by the Ombudsman's office were:

- protection of children's rights;
- protection of the rights of military personnel, veterans, persons liable for military service, families of military personnel and civilians held in captivity or missing in special circumstances;
- protection of the rights of persons affected by the armed aggression against Ukraine;
- protection of human rights in places of detention;
- protection of the rights of persons with disabilities and other low-mobility groups;
- protection of information rights.

1. Protection of children's rights

Protection of children's rights is one of the priority areas of activity and includes systematic work aimed at ensuring respect for the rights and legitimate interests of children, preventing their violations, timely response to identified cases of abuse and discrimination, as well as monitoring the living conditions, education, upbringing and access to social, educational and medical services for children.

During the monitoring visits in this area, a number of systemic violations of children's rights were identified, including

interaction between employees of the children's service and the Centre for Social and Psychological Rehabilitation of Children on social and legal protection of children is sporadic and requires a comprehensive solution;

problems with the statutory documents (Municipal Institution "Yablunivka Lyceum" of the Chernihiv Regional Council; Municipal Institution "Pryluky Educational and Rehabilitation Centre" of the Chernihiv Regional Council;

personal files of children from socially vulnerable categories are maintained in violation of the requirements of the current legislation (Pryluky Educational and Rehabilitation Centre of the Chernihiv Regional Council; Udaiets Educational and Rehabilitation Centre of the Chernihiv Regional Council; Yablunivka Lyceum of the Chernihiv Regional Council);

lack of licences to carry out economic activities in the field of medical practice (Municipal Institution "Yablunivka Lyceum" of the Chernihiv Regional Council; Municipal Institution "Udaiets Training and Rehabilitation Centre" of the Chernihiv Regional Council; Municipal Institution "Pryluky Training and Rehabilitation Centre" of the Chernihiv Regional Council; Municipal Institution "Sosnytsia Training and Rehabilitation Centre" of the Chernihiv Regional Council);

lack of staffing of institutional care and education facilities with specialised doctors, in particular: paediatrician, neurologist, neuropathologist and psychotherapist (Udaiets Training and Rehabilitation Centre of the Chernihiv Regional Council; Centre for Social and Psychological Rehabilitation of Children;

mould on the walls and windows in classrooms and living rooms, as well as inadequate ventilation in canteens and workshops (Yablunivka Lyceum of the Chernihiv Regional Council; Centre for Social and Psychological Rehabilitation of Children; Komarivka Lyceum of the Komarivka Village Council; Nizhyn Gymnasium No. 3 of the Nizhyn City Council);

health improvement and recreation for children from institutional care and education institutions from among orphans and children deprived of parental care, as well as children with special educational needs (Udaytsia Educational and Rehabilitation Centre of Chernihiv Regional Council; Yablunivka Lyceum of the Chernihiv Regional Council; Starobasanska Gymnasium of the Chernihiv Regional Council; Pryluky Educational and Rehabilitation Centre of the Chernihiv Regional Council; Sosnytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council, Nizhyn Orphanage);

privacy in bathrooms and showers is not ensured (Yablunivka Lyceum of the Chernihiv Regional Council; Pryluky Educational and Rehabilitation Centre of the Chernihiv Regional Council, Komariv Lyceum of the Komariv Village Council; Nizhyn Gymnasium No. 3 of the Nizhyn City Council).

labelling of children's clothing and underwear is not ensured (Yablunivka Lyceum of the Chernihiv Regional Council);

accessibility for persons with disabilities and low-mobility groups to institutions is not ensured (Sosnytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council; Yablunivka Lyceum of the Chernihiv Regional Council; Nizhyn Gymnasium No. 1 of the Nizhyn City Council; Nizhyn Gymnasium No. 3 of the Nizhyn City Council; Nizhyn Gymnasium No. 13 of the Nizhyn City Council; Chernihiv Gymnasium No. 9 of the Chernihiv City Council; Chernihiv Secondary School No. 19 of the Chernihiv City Council);

specially equipped bathrooms for use by persons with disabilities and screens to ensure the right to privacy when using the toilets were not provided in the shelter (Nizhyn children's residential facility);

facts of inadequate catering were recorded (Sosnytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council; Starobasanska Gymnasium of the Chernihiv Regional Council; Centre for Social and Psychological Rehabilitation of Children; Chernihiv Lyceum with enhanced military and physical training, Komariv Lyceum of Komariv Village Council, Koropska Secondary School named after T.G.

Shevchenko of Koropska village council). Taras Shevchenko of the Korop village council of the Chernihiv region; Nizhyn gymnasium No. 13 of the Nizhyn city council).

The visit to the Sosnytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council (hereinafter referred to as the Institution) revealed a lack of balanced nutrition and non-compliance with the established procedure for organising meals in the institution. In particular, the monitoring revealed discrepancies between the dishes listed on the approved menu and the dishes actually prepared for consumption. Violations of the requirements and standards for cooking were also found. In addition, the absence of dairy products in the warehouse of the institution was found.

As a result of responding to the recommendations to provide a balanced diet in compliance with cooking technology, the administration of the educational institution corrected all the comments and additionally conducted explanatory work with the canteen staff on catering issues. The right of 90 pupils to a balanced diet was restored.

In the context of martial law, the right of participants in the educational process to a safe educational environment is not respected, in particular, protective structures are in inadequate sanitary and technical condition (Nizhyn Gymnasium No. 1 of the Nizhyn City Council; Komarivsky Lyceum of the Komarivsky Village Council, Udaytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council; Yablunivsky Lyceum of the Chernihiv Regional Council).

During the monitoring visits to Nizhyn Gymnasium No. 1 of Nizhyn City Council, Komariv Lyceum of Komariv Village Council, Udaytsia Educational and Rehabilitation Centre of Chernihiv Regional Council, Yablunivka Lyceum of the Chernihiv Regional Council, inadequate conditions were found in the shelters, including excessive humidity and mould on the walls and ceiling, which posed a potential threat to the health of children, especially if they stayed in the shelters for a long time (overnight). Such conditions pose a threat to allergic reactions and respiratory diseases in both children and adults. The use of shelters in this condition effectively negates their purpose as a safe space and violates the right of children to safe and harmless conditions in an educational institution.

Based on the results of the response to the recommendations to create appropriate conditions for children to stay in shelters, the Chernihiv Regional Military Administration reported

the shelter of the Udaytsia Educational and Rehabilitation Centre of the Chernihiv Regional Council was renovated and a supply and exhaust ventilation

system with heat and air recovery was installed, which maintains a comfortable temperature and ensures constant circulation of fresh air in the room;

In the Komarivka Lyceum of the Komarivka Village Council, in 2025, the floor was screeded, linoleum was laid, washbasins and toilets for boys and girls were equipped, and the necessary supply of water and long-term storage food was created;

In the shelter of Nizhyn Gymnasium No. 1 of Nizhyn City Council, sanitary measures were taken to prevent the appearance of mould in the protective structure: the walls were treated with antibacterial drugs and covered with lime. In addition, the facility is systematically ventilated to maintain a proper microclimate.

At the same time, despite the response measures taken, the problematic situation at the Yablunivka Lyceum of the Chernihiv Regional Council persists, indicating that the violations are persistent and that comprehensive measures are needed at the level of the governing body.

An extremely important element to ensure not only the physical but also the psychological comfort of the child is the arrangement of comfortable indoor toilets. Every child has the right to respect for his or her dignity. Ensuring proper sanitary and hygienic conditions in the sanitary facilities of educational institutions is directly related to this right.

During the monitoring visit to Nizhyn Gymnasium No. 1 of the Nizhyn City Council (hereinafter - the gymnasium, the institution), a glaring problem was identified: there are only 2 toilets for 405 students in the institution.

During the monitoring visit to the gymnasium, it was found that the institution has two separate buildings in which the educational process is carried out. In the central building there is only one sanitary and hygienic unit with two shared cubicles for boys and girls of primary school age. During communication with the students of the gymnasium, it was found that some children, in particular those studying in the building without a bathroom, are forced to use the toilets located outside the institution.

In addition, due to the limited number of toilets, students are forced to take time off from classes to use the toilet, as queues form during breaks.

Based on the results of the monitoring visit, the Ombudsperson submitted a submission to the Chernihiv Regional Military Administration, Nizhyn District Military Administration, Nizhyn City Council of Chernihiv region to eliminate violations of children's rights and freedoms.

In order to create a safe educational environment and meet the requirements of paragraph 31 of the Sanitary Regulations for General Secondary Education Institutions, approved by the Order of the Ministry of Health of 25.09.2020 No. 2205, the principal of the gymnasium initiated the issue of arranging an internal bathroom in the building, where there is currently no such facility, before the deputies of the Nizhyn City Council. Based on the results of the review, the specialised commission recommended preparing a package of documents and calculating an estimate for the relevant work. The school administration has now sent a request to the Nizhyn City Council to calculate the cost of the repairs.

Out of **250** recommendations provided, **138** were implemented, **62** are in the process of implementation, and **50** have not been implemented.

2. Protection of the rights of servicemen, veterans, persons liable for military service, families of servicemen and civilians in captivity or missing in special circumstances

Chernihiv region is designated as the base region for meeting the Defenders and Defenders during exchanges of military personnel and civilian hostages and providing them with first aid. During such exchanges, the representative of the Ombudsperson in Chernihiv region monitors the observance of human rights in accordance with international humanitarian law, in particular, records the condition of the returned defenders, as well as informs them about their rights to receive social guarantees, renewal of documents and provision of medical care and rehabilitation measures in the future.

Particular attention is paid to protecting the rights of family members of persons held in captivity or missing under special circumstances and affected civilians under martial law. The implementation of this area involves consideration of appeals on establishing the status of a missing person; problems of appointing and conducting molecular genetic examinations; timely receipt of social payments, benefits, medical, psychological, humanitarian and legal assistance; the possibility of families sending military and civilian letters to our countrymen in captivity; reunification of families separated from their relatives as a result of the armed conflict; return of Ukrainian children from the occupied territories; establishing the connection between disability and wounds.

The Ombudsman's representative in the region, with the participation of ICRC experts, the regional working group of the Coordination Headquarters for the Treatment of Prisoners of War in Chernihiv region, Chernihiv Regional Prosecutor's Office, Chernihiv Scientific Research Forensic Centre of the Ministry of Internal Affairs of Ukraine, Chernihiv Regional Territorial Centre for Recruitment and Social Support, the Main Department of the Pension Fund of Ukraine in Chernihiv region, police, MPs and their assistants, representatives of veterans' organisations, and other stakeholders, held meetings with the representatives of the local authorities.

During these meetings, a number of systemic violations were identified regarding proper communication between relatives and military units; violations of the applicants' right to receive a written response to their appeals from the CMC and JV; refusals to accept documents for deferment of military service during mobilisation; delays in conducting official investigations into the disappearance of servicemen; difficulties in calculating and paying social and other mandatory payments, etc.

In order to monitor the observance of the right to adequate food and the right to healthcare, **4** healthcare facilities were visited where military personnel, war veterans and injured civilians under martial law are treated and rehabilitated.

In particular, with the support of the Rokada Charitable Foundation, healthcare facilities were monitored for observance of citizens' rights during the assessment of the daily functioning of a person at the Chernihiv Regional Hospital of the Chernihiv

Regional Council, the Chernihiv Central District Hospital, the Borznyianska City Hospital of the Borznyianska City Council, and the activities of the Healthcare Department of the Chernihiv Regional State Administration.

During a meeting with the families of missing and captured Defenders in July 2025 in the Osterska community, residents of the neighbouring Desnianska community expressed concern and outrage at the lack of proper support and communication from their local authorities. In particular, it was stated that the Desnianska community has not established systematic work with the families of servicemen who went missing or were in captivity. It was also noted that the community does not have a specialist responsible for supporting war veterans, demobilised persons and their families. This issue has become particularly relevant in the context of military aggression and the increasing number of families in need of comprehensive support and access to reliable information.

The representative of the Ombudsman in the region sent a letter to the head of the community to take appropriate measures to establish communication and support for the families of servicemen who went missing or were in captivity.

As a result of responding to the recommendation to remedy the situation, the village council took into account the shortcomings, and the community introduced a position of a specialist in support of war veterans, demobilised persons and their families.

3. Protection of the rights of victims of armed aggression against Ukraine

Taking into account the border location of the region and the long-term consequences of the armed aggression against Ukraine, protection of the rights of internally displaced persons is one of the priority areas of the Ombudsman's office. Particular attention is paid to ensuring the observance of the rights and legitimate interests of IDPs who have been forced to move from the areas of hostilities or temporarily occupied territories and live in border communities at high security risk.

In 2025, **16** monitoring visits were made to places of temporary residence in Chernihiv and the region.

The main violations of IDPs' rights recorded during the visits include: inadequate living conditions in temporary accommodation, failure to equip TACs for people with disabilities and low mobility; failure to use generators during power outages to maintain power in TACs; high utility bills, etc.

In 2025, the energy infrastructure of the region was deliberately destroyed by Russian shelling. As a result, residents often found themselves without access to basic electricity, water and heating services.

The Ombudsman's hotline received a complaint from residents of a dormitory located in Chernihiv on Ivan Mazepa Street about the lack of electricity in the building for a long time and the inadequate provision of household appliances.

After the complete blackout of the city, the dormitory building was not connected to the power grid for a week, and its residents were unable to meet their basic household needs for a long time.

The reason for the prolonged power outage in the dormitory was an emergency at the switchboard. The administration of the dormitory did not respond properly and did not initiate repair work. Another obstacle to the prompt elimination of the network malfunction was the bureaucratic delay by the management of the Department of Education and Science and the Department of Social Protection to clarify the subordination of the dormitory. Since the ICC is located on the basis of the dormitory of the educational institution, the relevant structural units of the Chernihiv Regional State Administration shifted responsibility and obligations for its maintenance among themselves.

Following the intervention of the Ombudsman's representative and personal assistance of the Head of the Chernihiv Regional Military Administration, the electricity supply to the dormitory was restored within a few hours, and its residents were provided with access to the necessary living conditions. The Ombudsperson's Office in Chernihiv region immediately conducted an unscheduled monitoring visit to the said ICC, which resulted in measures to improve the living conditions of the IDPs:

*provided with essential foodstuffs and bed linen;
household appliances (three electric stoves, 2 refrigerators, 3 microwave ovens, 5 kettles, 3 washing machines, etc);
a library with Internet access and 2 rooms for leisure activities of the dormitory residents were equipped.*

The rights of 12 IDPs and other residents of the dormitory were restored.

During the monitoring visit to the ICC, which is located in the dormitory of the Pryluky Technical Vocational College, inadequate living conditions for IDPs were recorded, in particular, the roof has been leaking for a long period of time, which leads to the destruction of the building as a whole. In one of the rooms, even in summer weather, the walls and ceiling are damp with traces of mould. The same problem is in the toilet, where plaster is falling off the ceiling and walls due to moisture.

Based on the results of the monitoring visit, recommendations were made to the Chernihiv CMA, Pryluky District Military Administration, Pryluky City Council and the management of the educational institution to ensure proper living conditions for IDPs.

Following the Ombudsman's response, measures were taken to cover the roof of the dormitory, toilets were arranged and the room for the installation of a shower was prepared, and the arrangement of a recreation room was started.

As a result, the right of 5 IDPs and other residents of the dormitory to proper living conditions was restored.

In the region, educational centres "Crimea-Ukraine" and "Donbas-Ukraine" operate on the basis of higher and vocational higher education institutions, which provide assistance to applicants from the temporarily occupied territories, in particular by providing individual consultations on the specifics of the admission campaign, paperwork, and support in choosing an educational institution: higher or vocational higher education. In 2025, monitoring visits were conducted to 3 such centres and it was noted that the recommendations provided in 2024 were fully implemented, and applicants from the temporarily occupied territories were provided with assistance, in particular, by providing individual consultations on the specifics of the admission campaign, paperwork, and support in choosing an educational institution: higher education or vocational pre-higher education.

Of the 38 recommendations provided, 12 were implemented; 24 were in the process of being implemented; and 2 were not implemented.

4. Protection of human rights in places of detention

As part of the implementation of the NPM's functions, shortcomings and systemic violations were identified in the activities of 21 institutions of the social protection system, which lead to violations of the rights and freedoms of the wards.

Non-compliance with the standard of living space per person in accordance with the requirements of DBN B.2.2-18:2007 "Buildings and structures. Institutions of Social Protection of the Population" (hereinafter - DBN B.2.2-18:2007), in particular, due to the mismatch between the design capacity of the institutions and the actual number of clients living in them, which leads to a violation of the established space standards per person.

During monitoring visits to residential care units for permanent or temporary residence of territorial social service centres, it was found that in 9 (64%) of the visited units, the living space per person is less than the standard: 8-10 m², and for people who use wheelchairs 10-12 m². In particular, the smallest recorded living space is 3.7 m² in the Inpatient Care Unit for permanent or temporary residence of the municipal institution "Social Services Centre" of the Bakhmach City Council.

There is also a systemic problem of overcrowding in residential social protection institutions of regional subordination.

In particular, in the Liubetsky Psychoneurological Residential Care Facility, residents live in living rooms of 18.5 m² and 15.5 m² for 4 and 3 people, respectively, resulting in a living space per person of 4.6 m² and 5.2 m².

The most critical situation was recorded in the Ponomnytsia Psychoneurological Boarding School, where the wards live in rooms for 7-8 people. The area of such living quarters ranges from 30.4 m² to 44.5 m², which provides living space per person only in the range of 4.3 m² to 5.6 m².

<i>During the visit to the Chernihiv Geriatric Home, the monitoring group found significant violations of the rights of the residents.</i>

One of the key problems is overcrowding in the institution. The design capacity of the facility is 430 beds. At the same time, 450 residents actually live there, including 41 temporarily displaced (evacuated) elderly people who previously lived in inpatient care units for the elderly and disabled in communities that suffer daily from armed attacks.

The living rooms of the boarding house are overcrowded and do not meet the established standards (there are no bedside tables and bedside tables), which negatively affects the living conditions and dignity of the residents. At the same time, the boarding house has 15 renovated rooms (10 double and 5 single) that are not used and, according to the management of the institution, are designated as reserves for emergency evacuation of people from the frontline communities of the region and crisis placement in the boarding house.

Based on the results of the monitoring visit, the Ombudsman sent a submission to the Ministry of Social Policy, Family and Unity of Ukraine, the National Social Service of Ukraine and the Chernihiv Regional Military Administration.

Pursuant to the submission, the Main Department of the National Social Service of Ukraine in Chernihiv Oblast conducted an unscheduled monitoring of the Chernihiv Geriatric Nursing Home's compliance with the law in the provision of social services. The working group found non-compliance with general and special criteria for the activities of a social service provider; the state standard of inpatient care; the procedure for supervision, etc. and sent the relevant requirements and recommendations for eliminating violations of the law.

As a result of responding to the Ombudsman's demands, the Chernihiv Oblast Military Administration informed about the work done to partially eliminate the violations and implement the recommendations.

At the same time, despite the response measures taken, the problematic situation in the residential facility persists, which indicates the persistence of violations and the need for comprehensive measures at the level of the governing body.

The above problem indicates a significant overload of social institutions of the state and municipal sector in the region and leads to systemic violations of the rights of wards to proper and decent living conditions and indicates the need to create/arrange additional beds for the provision of social services of inpatient care for permanent or temporary residence of elderly people and people with disabilities in compliance with the standards of living space per person in accordance with the requirements of the law.

Another problem is the prolonged failure to fill vacant positions of medical staff *in social care institutions*, which in some cases has been going on for many years. For example, in the Kozelets Geriatric Nursing Home, according to the tariff list of employees for 2025, 30 out of 43 full-time medical staff positions remain vacant, which is about 70 per cent of the total number of staff units.

The shortage of medical staff significantly impedes the provision of proper, full and high-quality medical services to residents and makes it virtually impossible to systematically monitor their health.

In residential institutions licensed to practice medicine, there are no clinical patient pathways developed in accordance with clinical protocols and standards of medical care, approved by the Ministry of Health of Ukraine, as well as kits (packages) for providing medical care in case of emergencies, which can pose a risk to the life and health of the residents (Ponornytsky NI, Kozeletsky Geriatric Nursing Home).

There is also a systemic violation of *the right to proper living conditions*. The wards are not provided with the necessary furniture and equipment in full, and the technical condition of residential and auxiliary premises is poor (worn-out decoration, furniture, plumbing equipment, etc.), which does not meet the sanitary and hygienic requirements for living in social care facilities.

The staff does not ensure proper cleaning of the premises, timely disinfection, and ventilation, which negatively affects the conditions of the wards. The number of sanitary facilities does not correspond to the actual number of clients, which makes it difficult to meet hygiene needs

Violations of food safety legislation that pose a threat to the health of the wards were identified, namely: violation of the commodity neighbourhood; presence of expired products; products with an unspecified expiration date; non-compliance with the requirements for the selection and storage of daily food samples. These violations indicate non-compliance with the mandatory requirements of food safety legislation and may lead to negative consequences for the health of the wards.

During the visit in August 2025 to the Inpatient Care Unit for permanent or temporary residence of the municipal institution "Social Services Centre" of the Bakhmach City Council (hereinafter - the unit, institution), the NPM group recorded inadequate living conditions for the wards.

In particular, the living rooms are overcrowded and not provided with the necessary number of tables and chairs, and the existing furniture is in a state of disrepair.

In addition, the living rooms were found to be in an unsanitary condition and to contain cockroaches, directly on the beds of the wards and their personal belongings, which indicates the inadequate quality of sanitary and hygienic measures. The premises require repair work.

It was found that some beds had three worn-out mattresses in poor condition. The inmates complained that the mattresses were torn and knocked down, which caused discomfort during sleep. At the same time, new mattresses were stored in the corridor of the facility, as well as sufficient bed linen and towels, which were not actually used.

During the visit, the NPM team found out that an IDP woman with an amputated lower limb was staying in the facility, who was left without a means of mobility due to damage to her wheelchair in an accident in the facility. Following the prompt response of the Ombudsman's representative, the issue was resolved by involving the Rokada Charitable Foundation, which provided the woman with a wheelchair.

Based on the results of the visit, the Ombudsman submitted a submission to the Ministry of Social Policy, Family and Unity of Ukraine, the National Social Service of Ukraine and the Chernihiv Regional Military Administration.

As a result of the response to implement the recommendations of the monitoring group, the following measures were taken the wards' living rooms were equipped with hard equipment; all the premises of the unit were disinfected; in the living rooms where bedridden wards live, there are screens to ensure privacy during sanitary and hygiene procedures; folding bars were installed in the sanitary and hygiene rooms; the ramp at the entrance to the Institution was equipped with a rough surface; during the scheduled repair of the residential building in 2026, horizontal handrails will be installed, high thresholds will be dismantled, and handrails will be installed in the corridors.

The right of 27 wards to proper living conditions in the institution was restored.

Systemic violations of the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures" (hereinafter - DBN B.2.2-40:2018) were found in almost all institutions, which consist in the fact that the buildings are not adapted to the needs of persons with disabilities and other low-mobility groups. In particular, the corridors of residential premises are not equipped with handrails, the upper and lower steps of the staircase are not marked and do not contrast with other steps of the staircase and horizontal platforms of the staircase, doors have unequipped thresholds, there are no elevators or lifts, sanitary facilities do not have handrails or other devices, and the installed ramps do not meet regulatory requirements.

During their visits, the NPM teams continue to record the lack of systematic cooperation between state-owned and municipally owned institutional care facilities and

free legal aid centres, which results in the clients being limited in receiving legal advice and legal support, in particular on the protection of property, social and personal non-property rights.

Based on the results of the visits carried out as part of the implementation of the NPM's functions, it was established that only **3** out of **17** inpatient care units in the region participate in the pilot project to organise the provision of social services to elderly IDPs and persons with disabilities on the principle of "money follows the person", introduced in accordance with the Resolution of the Cabinet of Ministers of Ukraine of 06.08.2024 No. 888.

In particular, the Inpatient Care Unit for permanent or temporary residence of the Social Service Centre of Komarivska Village Council and the Inpatient Care Unit for permanent or temporary residence of the Municipal Institution "Social Service Centre" of Baturyn City Council have organised the provision of social services to elderly IDPs and persons with disabilities within the framework of the pilot project, which indicates the existence of positive practices of its implementation at the local level, the Inpatient Care Unit for permanent or temporary residence of the Municipal Institution "Social Service Centre" of Baturyn City Council.

However, the limited number of social service providers within the pilot project does not ensure the full implementation of the principle of freedom of choice by recipients of social services, reduces the availability of residential care services for internally displaced older persons and persons with disabilities, and hinders the development of alternative, less institutional forms of care.

There is a lack of protective structures (shelters) that should ensure the safe stay of clients and staff in the event of an air raid. The existing protective structures (shelters) need to be repaired and cannot be operated.

The problem of responding to the air raid alarm remains a systemic one: the evacuation of wards and staff to shelters is not carried out, instead they continue to stay in living rooms or other premises of the institution.

Out of **406** recommendations, **223** were implemented, **102** were in the process of implementation, and **81** were not implemented.

5. Protection of the rights of persons with disabilities and other groups with reduced mobility

There is a systemic problem in the region with ensuring accessibility of premises and buildings for persons with disabilities in various spheres of public relations. The monitoring visits revealed numerous shortcomings that violate human rights, including problems with the architectural accessibility of such places, as well as the lack of properly equipped sanitary facilities for people with disabilities.

In order to determine the level of equal rights and freedoms, including accessibility of social infrastructure facilities in Chernihiv region, monitoring visits were made to **1** healthcare facility (Pryluky Central City Hospital) and **4** post offices of Ukrposhta in Pryluky, Chernihiv region, where the accessibility of buildings and premises for people with reduced mobility was investigated.

According to unscheduled monitoring visits to the post offices of JSC "Ukrposhta" in Pryluky: No. 17511 (30 Vavilova St.), No. 17501 (2 Pryvokzalna Sq.), No. 17507 (313-G Kyivska St.), No. 17500 (166 Kyivska St.), the architectural accessibility of the buildings and premises of the mentioned offices does not meet the requirements of DBN B.2.2-40:2018, in particular

- there are no separate parking spaces for personal vehicles of persons with disabilities and vehicles transporting persons with disabilities;*
- entrances to buildings are not equipped to meet the needs of persons with disabilities who use wheelchairs and for low-mobility groups;*
- inside the premises there are thresholds whose height exceeds the established standards, and there are no tactile stripes that would warn of various types of danger or obstacles to movement;*
- there are no sanitary facilities.*

Based on the results of the monitoring visits, the management of Ukrposhta informed about the planned works on the arrangement of the premises of branches No. 17507 and No. 17500 in accordance with the recommendations provided, except for the arrangement of sanitary facilities, as this currently requires additional involvement of specialists from the design organisation. The issue of eliminating the barrier problem in wards 17511 and 17501 was not considered, but the issue of their relocation is being addressed.

Of the **33** recommendations provided, **6** were implemented, **26** were in progress, and **1** was not implemented.

6. Protection of information rights

The issue of violation of information rights by state authorities, local self-government bodies, institutions and organisations under martial law remains relevant.

The Ombudsman's Office carried out **3** on-site inspections of the observance of the right to apply for and access to public information, as well as **4** inspections in the field of personal data protection. The monitoring results showed the following systemic violations:

- non-compliance by public authorities with the requirements of the legislation on ensuring the right of citizens to appeal, including the absence or non-functioning of telephone hotlines, the impossibility of submitting and registering oral appeals, posting outdated schedules for personal reception of citizens, etc;
- lack of public information in the public domain on websites regarding decisions, regulations, reports on satisfaction of requests for public information, and lack of data on financial resources.
- the Open Data Portal does not provide for the publication of data sets subject to disclosure in the form of open data in accordance with the Resolution of the Cabinet of Ministers of Ukraine No. 835 of 21.10.2015, etc.

Out of **32** recommendations provided, **20** were implemented, **6** were in the process of implementation, and **6** were not implemented.

As part of the parliamentary control over the observance of the constitutional right to appeal and the right to access public information by the public authorities, in particular under the martial law regime, an on-site inspection of the official website of the Department of Culture and Tourism, Nationalities and Religions of the Chernihiv Regional State Administration was conducted.

The inspection showed a generally adequate level of disclosure of information required by law, but some recommendations were made to eliminate the identified shortcomings.

To implement the recommendations, the Department updated key sections of the website, including the section "Citizens' appeals", which contains up-to-date background information on how to submit written and oral appeals, as well as information on the hotline. In the section "Access to Public Information", active hyperlinks to the Department's orders were provided, information on the procedure for appealing against decisions, actions or inaction of the information manager was added, and the document management system was streamlined.

Implementation of the recommendations helps to increase the level of openness and transparency of information administrators' activities, as well as improve the efficiency of communication between executive authorities and citizens.

Citizen N. appealed to the Commissioner with a complaint about violation of his right to apply to and receive a response from an individual entrepreneur providing housing maintenance services.

The investigation revealed that the applicant had sent a written application to the service provider asking for clarification on his rights and obligations as a consumer, as well as on violation of the contract terms. Due to the failure of to respond to the said appeal, the citizen repeatedly addressed the entrepreneur with a request to inform about the results of its consideration, but again did not receive a written response.

As part of the parliamentary oversight, the Commissioner's office opened proceedings and sent a request to the business entity to clarify the circumstances set out in the appeal. As a result of responding to this request, the company provided the applicant with a written response with the necessary explanations.

RECOMMENDATIONS:

Chernihiv Oblast State Administration, Oblast Military Administration:

to ensure that protective structures in educational institutions are brought into proper sanitary and hygienic condition and adequately ventilated in order to create safe conditions for children in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 of 09.07.2018;

ensure the organisation of recreation and leisure activities for children in institutional care and education facilities from among orphans and children deprived of parental care, as well as children with special educational needs;

to ensure the approval and full funding of the regional programme for meeting the needs of individuals/families for social services based on the identified needs of the population of the region in accordance with paragraph 4 of Article 11, Article 25 of the Law of Ukraine "On Social Services", Resolution of the Cabinet of Ministers of Ukraine of 14 January 2026 No. 64 "Some issues of organising the provision of social services";

to ensure control over the strict compliance with the requirements of the State Standard of Inpatient Care to expand the provision of social inpatient care services (arrangement/creation of beds) for permanent or temporary residence of elderly people and people with disabilities that would fully meet the needs of residents in these services in Chernihiv, Nizhyn, Pryluky, Koryukiv, Bobrovytsia, Horodnya, Nosiv and Oster city territorial communities

to ensure elimination of the identified violations of the requirements of DBN B.2.2-18:2007 in terms of non-compliance with the permissible standard living space for clients in the living rooms of social institutions providing social services with round-the-clock accommodation (stay) and to ensure proper control over their compliance;

to ensure that the activities of social service providers with round-the-clock accommodation (stay) are brought in line with the Criteria for the activities of social service providers approved by the Resolution of the Cabinet of Ministers of Ukraine No. 185 dated 03.03.2020, in particular in terms of providing barrier-free space in the premises of such providers in accordance with the requirements of DBN B.2.2-40:2018;

to ensure systematic control over the compliance of structural units of the regional military administration and district military administrations with the requirements of the legislation in the field of exercising the right of citizens to apply and access public information, in particular, the completeness and relevance of information published on official websites, the functioning of hotlines and the streamlining of public information accounting systems.

To the Main Department of the National Social Service in Chernihiv region:

To ensure that the state control/monitoring measures are taken to ensure that Chernihiv, Nizhyn, Pryluky, Koryukiv, Bobrovytsia, Horodnya, Nosivka and Osters city territorial communities comply with the requirements of the Law of Ukraine "On Social Services" in terms of providing social services of inpatient care for permanent or temporary residence of elderly people and people with disabilities in accordance with the needs of residents of territorial communities for these services, determined in accordance with paragraph 5 of Article 11 and Article 25 of this Law.

Local self-government bodies:

Ensure monitoring of the timeliness of determining the needs of the population of territorial communities for social services in accordance with paragraph 5 of Article 11,

Article 25 of the Law of Ukraine "On Social Services", paragraph 4 of Article 34 of the Law of Ukraine "On Local Self-Government in Ukraine", Resolution of the Cabinet of Ministers of Ukraine No. 64 of 14 January 2026 "Some Issues of Organising the Provision of Social Services" and approve, based on the results of the assessment, plans for the development of social services in the territorial community;

ensure the approval and full funding of local programmes to meet the needs of individuals/families for social services;

to ensure the provision of social services of inpatient care for permanent or temporary residence of the elderly and persons with disabilities (arrangement/creation of beds) in Chernihiv, Nizhyn, Pryluky, Koryukiv, Bobrovytsia, Horodnya, Nosiv and Oster city territorial communities that would fully meet the needs of the residents of the territorial communities for these services, as defined in accordance with paragraph 5 of Article 11, Article 25 of the Law of Ukraine "On Social Services";

to take measures to expand the network of providers of social services of inpatient care based on the identified needs of residents of territorial communities in accordance with paragraph 4 of Article 11, Article 25 of the Law of Ukraine "On Social Services", the Resolution of the Cabinet of Ministers of Ukraine of 14 January 2026 No. 64 "Some issues of organisation of social services", as well as supported living services within the framework of the pilot project on the organisation of social services for internally displaced elderly persons and persons with disabilities

to ensure constant monitoring of the organisation of safe food, the quality of social services, the organisation of medical care for clients, sanitary and hygienic, anti-epidemic (preventive) and fire protection measures in social institutions that provide social services with round-the-clock accommodation (stay);

Ensure that the number of employees of children's services is brought in line with the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children";

Ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans;

to ensure compliance with the requirements of paragraph 2 of the Resolution of the Cabinet of Ministers of Ukraine of 20.08.2021 No. 893 on the introduction and organisation of the functioning of the child foster care service;

to ensure the publication on official websites of information provided for by the Law of Ukraine "On Access to Public Information" and the exercise of the right to submit an oral appeal, in particular by calling the contact number published on the official website.

List of Abbreviations

AFU	Armed Forces of Ukraine
AP I	Protocol Additional to the Geneva Conventions of 12 August 1949, and relating to the Protection of Victims of International Armed Conflicts (Protocol I), 8 June 1977
ARC	Autonomous Republic of Crimea
ASC	Administrative Service Centre
AWOL	Absence Without Leave
BTI	Technical Inventory Bureau
CAS Ukraine	Code of Administrative Procedure of Ukraine
CBEP	Central bodies of executive power
CC Ukraine	Criminal Code of Ukraine
CCU	Constitutional Court of Ukraine
CDC	Regional Center for Disease Control and Prevention of the Ministry of Health of Ukraine
CEC Ukraine	Criminal Executive Code of Ukraine
Center	Child Rights Protection Center
Charter	European Charter for Regional or Minority Languages
CMoMN	Coercive Measures of a Medical Nature
CO	Critical Infrastructure
CoAO of Ukraine	Code of Ukraine on Administrative Offenses
CoJU	Council of Judges of Ukraine
Commissioner	Ukrainian Parliament Commissioner for Human Rights
CPC Ukraine	Criminal Procedure Code of Ukraine
CPCU	Commercial Procedure Code of Ukraine
CPCU	Civil Procedure Code of Ukraine
CPT	European Committee for the Prevention of Torture and Inhuman or Degrading Treatment or Punishment
CRSV	Conflict-Related Sexual Violence
CS	Children's Service
(C) VLC	(Central) Military Medical Commission

DESS	State Service of Ukraine for Ethnic Policy and Freedom of Conscience
DR	detention room
ECtHR	European Court of Human Rights
eHealth	Electronic Health Care System
ENNHRI	European Network of National Human Rights Institutions
ERC	Educational and Rehabilitation Centre
EU	European Union
FDU	Foreign Diplomatic Unit of Ukraine
Full Name	Surname, first name, patronymic
GANHRI	Global Alliance of National Human Rights Institutions
GC III	Geneva Convention relative to the Treatment of Prisoners of War
GC IV	Geneva Convention relative to the Protection of Civilian Persons in Time of War
GS AFU	General Staff of the Armed Forces of Ukraine
GSEI	General Secondary Education Institution
HACC	High Anti-Corruption Court of Ukraine
HCC SCESU	Health Care Center of the State Criminal-Executory Service of Ukraine
HCF	Health Care Facility
HCJ	High Council of Justice
HEI	Higher Education Institution
HQCJ	High Qualification Commission of Judges of Ukraine
HRMMU	United Nations Human Rights Monitoring Mission in Ukraine
ICMP	International Commission on Missing Persons
ICRC	International Committee of the Red Cross
IDC	Immigration Detention Centre
IDP	Internally displaced person
IHL	International Humanitarian Law

IRC	Inclusive Resource Center
JC	juvenile colony
KMU (Government of Ukraine)	Cabinet of Ministers of Ukraine
KOAC	Circuit Administrative Court of Kyiv City
KoordShtab	Coordination Headquarters for the Treatment of Prisoners of War
LGBTQI+	lesbians, gay, bisexuals, transgender people, intersex people and queer people, as well as others with different sexual orientations, gender identities and sex characteristics ('+')
Lump sum	lump sum payment
MAB	Medical Advisory Board
MDNP	Main Directorate of the National Police
Media	Mass Media
MEU	Ministry of Energy of Ukraine
MFA	Ministry of Foreign Affairs of Ukraine
MIA of Ukraine	Ministry of Internal Affairs of Ukraine
MID NPU	Main Investigation Directorate of the National Police of Ukraine
MinCult	Ministry of Culture of Ukraine
MinDigital	Ministry of Digital Transformation of Ukraine
Mineconomy	Ministry of Economy, Environment and Agriculture of Ukraine
MinFin	Ministry of Finance of Ukraine
MinJust	Ministry of Justice of Ukraine
MinReintegration	Ministry for Reintegration of Temporary Occupied Territories of Ukraine
Minvet	Ministry for Veterans Affairs of Ukraine
MLE	Military Law Enforcement Service
MLRS	Multiple Launch Rocket System
MNE	Ministry of National Unity of Ukraine
MoD	Ministry of Defence of Ukraine
MoD	Ministry of Defence

MoH	Ministry of Health of Ukraine
MON	Ministry of Education and Science of Ukraine
MSEC	Medical and Social Expert Commissions
MSPFU	Ministry of Social Policy, Family and Unity of Ukraine
MTD	Ministry for Development of Communities and Territories of Ukraine
NABU	National Anti-Corruption Bureau of Ukraine
NACP	National Agency on Corruption Prevention
National Council	National Council of Television and Radio Broadcasting of Ukraine
NBU	National Bank of Ukraine
NEURC	National Commission for State Regulation in the Energy and Utilities Sectors
NHRI	National Human Rights Institution
NHSU	National Health Service of Ukraine
NPA	Normative legal act
NPM	National Preventive Mechanism
NPM Department	Department for the Implementation of the National Preventive Mechanism
NPU	National Police of Ukraine
NSSU	National Social Service of Ukraine
OAScK	District Administrative Court of Kyiv city
ODIHR	OSCE Office for Democratic Institutions and Human Rights
OGP	Office of the Prosecutor General
OHCHR	Office of the United Nations High Commissioner for Human Rights
OMS	Local self-governing bodies
Optional Protocol	Optional Protocol to the Convention against Torture and other Cruel, Inhuman or Degrading Treatment or Punishment
OSCE	Organization for Security and Co-operation in Europe
OST	Opioid Substitution Therapy

PE	Penitentiary Establishment
PEI	Preschool Education Institution
PFU	Pension Fund of Ukraine
PMG	Program of Medical Guarantees
PNI	Psychoneurological Institution
PTPI	Point of Temporary Holding of Foreigners and Stateless Persons Illegally Staying in Ukraine
PTR	Places of Temporary Residence
PTT	Temporary Holding Point
QDCP	Qualification and Disciplinary Commission of Prosecutors
RB	Republic of Belarus
RC	remand centre
RDDP	Registry of Damaged and Destroyed Property
RF	Russian Federation
RMA	Regional Military Administration
RNOKPP	Registration Number of the Taxpayer's Account Card
RPD	Regional Police Department
RSA	Regional State Administration
(R) TCR and SS	(Regional) Territorial Recruitment and Social Support Center
SAAC	Sixth Administrative Appeal Court
SBGS	State Border Guard Service of Ukraine
SBGS	State Border Guard Service of Ukraine
SBI	State Bureau of Investigations
SBS	State Building Standards
SBU	Security Service of Ukraine
SC	Supreme Court
SC	Solitary Confinement
SCESU	The State Criminal-Executive Service of Ukraine
SCRO	State Civil Registration Office
Secretariat of the Commissioner	Secretariat of the Ukrainian Parliament Commissioner for Human Rights

SEI	State Energy Supervision Inspectorate of Ukraine
SEN	special educational needs
Shelter	Shelter for victims of domestic and/or gender-based violence
SI	State Institution
SJA	State Judicial Administration of Ukraine
SLAPP	Strategic Lawsuits Against Public Participation
SMS	State Migration Service of Ukraine
SPT	Subcommittee on Prevention of Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
SSC	Social Services Center
SSUCR	State Service of Ukraine for Children's Rights
SSUFSCP	State Service of Ukraine for Food Safety and Consumer Protection
STS	State Tax Service of Ukraine
TD SJAU	Territorial Department of the State Judicial Administration of Ukraine
TDF	temporary detention facility
TG	Territorial Community
TOT	Temporarily Occupied Territory of Ukraine
TU SBI	Territorial Office of the State Bureau of Investigation
Ukrtransbezpeka	State Service of Ukraine for Transport Safety
UN	United Nations
UNBA	Ukrainian National Bar Association
UNCAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment
UNHCR	Office of the United Nations High Commissioner for Refugees
UNHRC	United Nations Human Rights Council
UNICEF	United Nations Children's Fund
URPTI	Unified Register of Pre-trial Investigations
USC	Unified Social Contribution
USEDE	Unified State Electronic Database on Education
VPC	Vocational Pre-tertiary College

VRU	Verkhovna Rada of Ukraine

Appendix 1

Status of Implementation of the Recommendations of the Ukrainian Parliament Commissioner for Human Rights, Provided in the Annual Report on the Observance and Protection of Human and Civil Rights and Freedoms in Ukraine in 2024

Status of implementation	Implemented	In the process of implementation	Not implemented	No longer relevant
Number of items to be completed	203	162	44	5

To the Verkhovna Rada of Ukraine:		
.	Ensure consideration and adoption of the Draft Law of Ukraine "On Amendments to the Criminal Code of Ukraine on the Introduction of Criminal Liability for Violation of the Legislation on Defence, Mobilisation Preparation and Mobilisation Committed by Heads of Territorial Recruitment and Social Support Centres, Heads and Members of Military Medical Commissions" (Reg. No. 12442 of 27.01.2025)	In the process of implementation

.	To consider and support the draft law on amendments to the Criminal Procedure Code of Ukraine regarding the peculiarities of pre-trial investigation of criminal offences related to the disappearance of persons under special circumstances during martial law, reg. no. 12414 of 16.01.2025	Implemented
.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on Peculiarities of State Registration of Civil Status Acts that Occurred on the Territory of Ukraine Temporarily Occupied by the Russian Federation and Outside of of Ukraine" (reg. No. 9069 of 28 February 2023)	No longer relevant
.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to Article 5 of the Law of Ukraine "On the Status of Mountainous Settlements in Ukraine" on the Protection of the Rights of Internally Displaced Persons" (reg. No. 12300 of 11 December 2024)	Not implemented
.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to the Law of Ukraine "On Ensuring the Rights and Freedoms of Internally Displaced Persons" and other laws of Ukraine" (reg. No. 12301 of 11 December 2024)	Not fulfilled
.	To amend the Law of Ukraine "On the State Budget of Ukraine for 2025" by cancelling Article 40 of the relevant Law	No longer relevant
.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to Certain Legislative Acts on Effective Ensuring the Right of Prisoners and Convicts to Free Legal Aid" (reg. No. 12073 of 27.09.2024)	Implemented
.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine to Bring Them in Line with the Requirements of Articles 8 and 14 of the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights) and Council Regulation (EU) 2016/1104 on the implementation of enhanced cooperation in the field of jurisdiction, applicable law and the	In the process of implementation

	recognition and enforcement of decisions on property effects of registered partnerships" (reg. No. 12252 of 27.11.2024)	
.	Ensure consideration and adoption of the Draft Law of Ukraine "On Amendments to the Code of Administrative Offences and the Criminal Code of Ukraine on Combating Discrimination" (Reg. No. 5488 of 13 May 2021)	No longer relevant
0.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to Certain Laws of Ukraine on Ensuring the Exercise of the Right to Acquire and Retain Ukrainian Citizenship" (reg. No. 11469 of 07.08.2024)	Done
1.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to the Law of Ukraine "On State Assistance to Families with Children" to extend the terms for applying for state assistance to families with children for the period of martial law in Ukraine" (registration No. 11414 of 18 July 2024)	Not implemented
To the Ministry of Defence of Ukraine:		
2.	To improve the mechanism of manning military units by developing recruitment structures, in particular in military units, formations and branches of the armed forces, including the possibility of recruiting abroad	In progress
3.	Improve the procedure for the exchange of medical documents, including certificates of injury and military medical commission rulings, between medical, financial and other units of military units by amending departmental regulations	In progress
4.	To amend the Regulation on Military Medical Expertise in the Armed Forces of Ukraine, approved by the MoD Order of 14.08.2008 No. 402, in terms of determining the health status of servicemen who are unfit to perform duties at the territorial place of their performance (in particular, those who are unable to perform duties on the line of contact)	Not implemented

5.	To develop amendments to Annex 19 of the Order of the Minister of Defence of Ukraine of 10.04.2009 No. 170, which would define specific and valid forms of documents to be attached by servicemen to reports on discharge from military service for family reasons	Completed
6.	To ensure control over the process of establishing clear interaction between territorial centres for recruitment and social support and military units regarding the realisation of the rights of combatants and their families, as well as families of fallen servicemen	Implemented
7.	Ensure compliance with the established norms of space per serviceman and bring the planned staffing of disciplinary battalions and brig units in line with national and international standards	Done
8.	Initiate amendments to the Law of Ukraine "On the Statute of Internal Service of the Armed Forces of Ukraine" to establish the norm of space per serviceman at the level of 4 m ²	Not fulfilled
9.	Introduce a mechanism for reviewing complaints of discrimination, including on the grounds of sexual orientation and gender identity, in the Armed Forces of Ukraine to ensure objectivity, impartiality and confidentiality for complainants	In progress
To the Ministry of Communities and Territories Development of Ukraine:		
0.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Resolution of the Cabinet of Ministers of Ukraine of 31 March 2004 No. 422 "On Approval of the Procedure for Formation of Temporary Accommodation Funds and the Procedure for Provision and Use of Housing Premises from Temporary Accommodation Funds" and to include persons in respect of whom the deprivation of personal liberty as a result of armed aggression against Ukraine has been established in the Procedure for Formation	No longer relevant

	of Temporary Accommodation Funds after their release	
1.	To develop and submit to the Cabinet of Ministers of Ukraine amendments to paragraph 8, item 7 of the Regulation on the Commission for Establishing the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 1281 of 15.11.2022, which would extend the right to receive annual state financial assistance for a person in respect of whom the fact of deprivation of personal liberty as a result of armed aggression against Ukraine has been established to persons referred to in subparagraph b, item 2, part one, Article 2 of the Law	In the process of implementation
2.	To initiate access to information and communication systems, state registers, databases for the members of the Commission on establishing the fact of deprivation of personal liberty as a result of armed aggression against Ukraine, to enable confirmation of family ties between applicants and persons deprived of personal liberty as a result of armed aggression against Ukraine	Completed
3.	To enable persons who have applied to the Commission on establishing the fact of deprivation of personal liberty as a result of armed aggression against Ukraine to provide explanations and/or comments to the Commission in accordance with the requirements of the law	Completed
4.	At the request of persons who have applied to the Commission to establish the fact of deprivation of personal liberty as a result of armed aggression against Ukraine, provide in writing the justification (motivation) for the decision not to confirm the fact of deprivation of personal liberty as a result of armed aggression against Ukraine	Completed
5.	To regulate the possibility of receiving annual state financial aid to the personal account of an authorised person at during the period of martial law in Ukraine or in some of	In the process of implementation

	its regions for all categories of persons in respect of whom the deprivation of personal liberty as a result of armed aggression against Ukraine has been established	
6.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Operational Action Plan for the implementation of the State Policy Strategy on Internal Displacement until 2025	Not implemented
7.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the approval of the State Policy Strategy on Employment of IDPs and the Operational Action Plan for its implementation	Not fulfilled
8.	to develop and submit to the Cabinet of Ministers of Ukraine a draft decree on approval of the State Policy Strategy on Ensuring Housing Rights of Internally Displaced Persons in Ukraine and an operational plan of measures for its implementation	Not fulfilled
9.	Ensure the development and adoption of a procedure for notifying the population of mandatory evacuation, including mandatory evacuation of children with their parents, persons in loco parentis or other legal representatives, using various applications, including the Diia mobile application, and telecommunications operators	Completed
0.	Amend the Procedure for Evacuation in Case of Threat or Occurrence of Emergency Situations, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 841 of 30 October 2013, to determine the terms and grounds for the decision of the Military Administration to conduct mandatory evacuation, including mandatory evacuation of children with their parents, persons in loco parentis or other legal representatives (at in coordination with the military command authorities in the relevant territory and the Coordination Headquarters for Evacuation of Children).	Completed
1.	To develop and approve amendments to the Procedure for disconnecting consumers from the networks (systems) of district heating	Not fulfilled

	(heat supply) and hot water supply in terms of simplifying the procedure for disconnecting owners (co-owners) of buildings, including residential buildings, apartments and non-residential premises of apartment buildings from the networks (systems) of district heating (heat supply) and hot water supply	
The Ministry of Social Policy of Ukraine:		
2.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the establishment and functioning of the System of Information on Damage and determine the stages of its further implementation and content	Completed
3.	to develop and submit to the Cabinet of Ministers of Ukraine a draft law on support for persons whose personal non-property rights have been damaged as a result of the armed aggression of the Russian Federation against Ukraine	Not fulfilled
4.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to revise the mechanism of granting accommodation allowances to IDPs, extending the payment of such allowances until the lifting of martial law	Not implemented
5.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on some peculiarities of payment of pensions (monthly lifetime allowance) and insurance payments under the insurance against accidents at and occupational diseases that caused disability	Implemented
6.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the introduction of a procedure for the appointment, renewal and continuation of pensions for persons who moved from the Autonomous Republic of Crimea and the city of Sevastopol	Completed
7.	Ensure the functioning of the information system for registration of orphans, children deprived of parental care, children in difficult life circumstances, with the introduction of information exchange on such children, by synchronising data from bodies, institutions at the local, regional and central levels, as well as	Under implementation

	institutions of different types, forms of ownership and subordination to which children are placed	
8.	To analyse and ensure an increase in the number of staff of the National Social Service in order to effectively implement measures for state control over the observance of children's rights, as well as to fulfil its powers and functions on international cooperation	Under implementation
9.	To develop and approve the procedure for the State Service of Ukraine for Children to analyse the effectiveness of measures to ensure the best interests of the child, monitor and evaluate the results of observance and protection of children's rights, and implement the state policy in the field of child protection	Implemented
0.	To develop and submit to the Cabinet of Ministers of Ukraine proposals for amendments to the Procedure for State Control/Monitoring of Compliance with Legislative Requirements in the Provision of Social Support, Social Services and Children's Rights, approved by the Cabinet of Ministers of Ukraine on 6 October 2021 No. 1035, in terms of including pre-trial detention facilities and penitentiary institutions in the list of monitoring objects	In the process of implementation
1.	Amend the Model Regulation on the Service for Children of a City, District Council and the Model Regulation on the Service for Children of a Village or Settlement Council, approved by the Order of the Ministry of Social Policy of Ukraine No. 518 of 16.09.2021, to ensure that officials of the children's services of local self-government bodies carry out mandatory quarterly inspections of institutions of various types, forms of ownership and subordination, where orphans and children deprived of parental care are placed for round-the-clock stay, located in	Completed
2.	To develop and submit to the Cabinet of Ministers of Ukraine draft amendments to the Model Regulation on the Service for Children of Regional, Kyiv and Sevastopol City State Administrations, approved by the Cabinet of Ministers of Ukraine on 30 August 2007, No.	Completed

	1068, regarding the implementation of control measures by the services for children of regional state administrations over the activities of the services for children of local self-government bodies in the implementation of measures related to the protection of the rights and interests of children in difficult life circumstances,	
3.	Develop and approve the procedure for interaction between children's services at the place of initial registration of children and children's services at the place of their residence (stay), relevant regional state administrations in terms of performing functions and powers to ensure and protect the best interests of children who have changed their place of residence	Implemented
4.	To approve standard qualification requirements for employees of children's services	Not implemented
5.	To develop and approve minimum standards for the provision of items, materials and equipment to children in social support centres for children and families, centres for social and psychological rehabilitation of children, and small group homes	Completed
6.	To develop and submit to the Cabinet of Ministers of Ukraine draft amendments to paragraph 50 of the Procedure for Adoption and Supervision of Adopted Children's Rights, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 905 of 8 October 2008, in order to ensure that potential adopters from different regions of Ukraine can get acquainted with information about children for adoption whose profiles have been submitted to the regional level, as well as to exercise the right to meet the child without reference to the requirement to fulfil the obligation to provide the child with a parental care	Implemented
7.	To develop and submit to the Cabinet of Ministers of Ukraine draft amendments to the Model Regulation on the Commission for the Protection of Children's Rights, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 866 of 24.09.2008, and the	Implemented

	Resolution of the Cabinet of Ministers of Ukraine No. 843 of 04.08.2021 "Some issues of social protection of children placed for round-the-clock stay in institutions of various types, forms of ownership and subordination" to establish the obligation of parents to provide the Commission for the Protection of Children's Rights with explanations and grounds for the need to place a child for round-the-clock stay	
8.	To develop and submit to the Cabinet of Ministers of Ukraine amendments to the Procedure for Temporary Relocation (Evacuation) of Children and Persons Residing or Enrolled in Institutions of Different Types, Forms of Ownership and Subordination for Round-the-Clock Stay, and Their Return to the Place of Permanent Residence (Stay), and in Case of Travelling Outside Ukraine - to Ukraine, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 546 of 01.06.2023, in order to determine clear deadlines for the assessment of the safety of children and persons in institutions with a	Completed
9.	To develop and approve the procedure for action in case of detection of signs of cruel treatment and violence against children enrolled in institutional care and education facilities of various types, forms of ownership and subordination	Implemented
0.	Prepare and send to the LEA a list of buildings to which residential institutions can be relocated or to resettle children evacuated from the area of active hostilities or from settlements close to it to prevent overcrowding in institutions	In progress
1.	To analyse the Methodological Recommendations on the Organisation of Occupational Therapy for the Elderly, Persons with Disabilities, and Children with Disabilities in Institutions of the Social Protection System, approved by the Order of the Ministry of Social Policy of Ukraine No. 1778 of 26.11.2018, to identify gaps that lead to abuse by the administrations of institutions in the organisation of occupational therapy	Under implementation

2.	To organise and conduct training for administrations of residential institutions on the implementation of occupational therapy in accordance with the requirements of the current legislation and human rights standards	In progress
3.	Develop and submit to the Cabinet of Ministers of Ukraine a draft decree on the approval of the National Action Plan for the implementation of the Convention on the Rights of Persons with Disabilities for the new period until 2030, taking into account the recommendations of the UN Committee on the Rights of Persons with Disabilities	Not fulfilled
4.	To develop a draft State Social Programme for Preventing and Combating Domestic and Gender-Based Violence for the period up to 2030, taking into account the need to strengthen measures to disseminate information on domestic violence	Under implementation
5.	To develop and approve a procedure for interaction between bodies, institutions and organisations in responding to cases of sexual violence related to the armed aggression of the Russian Federation against Ukraine, to ensure that victims receive appropriate assistance, protection and their rights to receive emergency financial assistance	Not implemented
6.	To develop and submit to the Cabinet of Ministers of Ukraine a draft Law of Ukraine "On Amendments to the Law of Ukraine "On Combating Trafficking in Human Beings" to improve certain provisions regulating issues in the field of combating trafficking in human beings", which, in particular, provides for the empowerment of local governments to take measures in the field of combating trafficking in human beings	Not implemented
7.	To monitor the barrier-free access to social services for refugees and persons seeking protection in Ukraine, as well as persons undergoing the procedure for granting refugee status or a person in need of complementary or temporary protection, and, based on the results of the monitoring, to consider initiating changes to the current legislation	Under implementation

8.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Law of Ukraine "On Compulsory State Pension Insurance" regarding the mechanism of inclusion of periods of work for which the employer did not pay the unified social contribution into the insurance period, provided that the employer submits reports on accrued contributions	Implemented
9.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Law of Ukraine "On the Status and Social Protection of Citizens Affected by the Chernobyl Disaster" of 28 February 1991 No. 796-XI to resolve problematic issues of pension supplementation for non-working pensioners living in the territory of radioactive contamination	In the process of implementation
0.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the procedure for calculating the insurance period to ensure the implementation of the Law of Ukraine "On Amendments to Certain Laws of Ukraine on the Settlement of the Issue of Calculating Insurance Period and Pension Provision" of 25 April 2024 No. 3674-IX	Implemented
1.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Procedure approved by the Resolution of the Cabinet of Ministers of Ukraine No. 1040 of 6 October 2021 on the award of compensation to individuals who provide social care services on a professional basis in the part concerning the conclusion on the health status of a person in need of such services	Implemented
2.	Ensure monitoring of the situation of unaccompanied children abroad, as well as during their return	Completed
3.	To develop and approve the procedure for the National Social Service to carry out control measures over the implementation by guardianship and custody authorities of the functions provided for in the Procedure for the Return to Ukraine of Children Deprived of	Completed

	Parental Care who are Citizens of Ukraine, approved by the Cabinet of Ministers of Ukraine of 23.04.2003 No. 659	
The Ministry of Health of Ukraine:		
4.	To develop and submit to the Cabinet of Ministers of Ukraine draft amendments to the Resolution of the Cabinet of Ministers of Ukraine of 15 March 2024 No. 296 "On Approval of the Procedure for Conducting Restorative (Post-Isolation, Reintegration) Measures, Adaptation, Support (Accompaniment) of Persons in Respect of Whom the Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine has been Established, after their Release" in terms of improving the provision of medical, rehabilitation and psychological assistance to released civilians	Implemented
5.	Ensure the expansion of the system of forensic medical institutions, their proper equipment and increase the number of experts involved in the examination of fallen defenders of Ukraine	Done
6.	Ensure the introduction of the maintenance and generalisation of quantitative indicators on children suffering from rare (orphan) diseases and their need for special dietary nutrition and medicines	In progress
7.	Ensure annual submission of proposals for amendments to the List of Medicines, Medical Devices and Auxiliary Products procured at the expense of the state budget, as provided for by the Resolution of the Cabinet of Ministers of Ukraine No. 216 of 07.03.2022 "Some Issues of Procurement of Medicines, Medical Devices and Auxiliary Products"	Under implementation
8.	Ensure the establishment of institutions for the rehabilitation of children with drug addiction in accordance with the Regulation on the Centre for Medical and Social Rehabilitation of Minors, approved by the Cabinet of Ministers of Ukraine on 6 September 1996, No. 1072	Not fulfilled

9.	Provide for expenditures for the implementation of measures to ensure uninterrupted and free provision of citizens suffering from rare (orphan) diseases with medicines and relevant food products for special dietary consumption	Completed
0.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law amending the legislation to define the concept of "energy drink" and prohibit its sale to persons under the age of 18	Under implementation
1.	To amend the Rules for the use of physical restraint and (or) isolation in the provision of psychiatric care to persons suffering from mental disorders and the forms of primary accounting documentation approved by the Order of the Ministry of Health of 24.03.2016 No. 240 to comply with the recommendations of the CPT "Restraints in adult psychiatric institutions" (CPT/Inf(2006)35-part)	In the process of implementation
2.	Develop a system of registration of cases of use of restraints, combined with the Electronic Healthcare System, and organise systematic monitoring of the practice of their use to develop a strategy to reduce their frequency and duration	In progress
3.	Develop and implement basic training and regular refresher courses for healthcare professionals on the use of restraints and de-escalation methods with patients with mental disorders	In progress
4.	to amend the form of primary accounting documentation No. 511/o "Certificate No. ____ on the recording of bodily injuries" and the Instructions for filling in the form of primary accounting documentation No. 511/o "Certificate No. ____ on the recording of bodily injuries", approved by the Order of the Ministry of Health of 02.02.2024 No. 186 in order to establish the need for a medical professional to document the conclusions of his/her observation on the compliance of the victim's statements about the origin of the injuries with	Implemented

	objective medical conclusions of their probable origin.	
5.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law of Ukraine to regulate the issue of state supervision (control) over compliance with the requirements of sanitary legislation in the areas of economic activity that may pose a risk to the health and sanitary and epidemiological well-being of the population	In the process of implementation
6.	To develop and submit to the Cabinet of Ministers of Ukraine draft amendments to the Resolution of the Cabinet of Ministers of Ukraine of 17 August 1998 No. 1303 "On the Regulation of Free and Preferential Supply of Medicinal Products on Prescription for Outpatient Treatment of Certain Population Groups and for Certain Categories of Diseases" in terms of adding Schwachmann-Diamond Syndrome to the list of categories of diseases for which outpatient treatment is free of charge	In the process of implementation
7.	To approve the national classifier of rare (orphan) diseases	In progress
8.	To update the industry standards in the healthcare sector (guidelines, standards and unified clinical protocols) for the detection, early diagnosis and treatment of patients suffering from rare (orphan) diseases	In the process of implementation
9.	To organise and conduct information campaigns on the rights of citizens to receive medical services, including reproductive health services, at the expense of the state budget	On track
The Ministry of Foreign Affairs of Ukraine:		
0.	To amend the Regulation on the Consular Fee of Ukraine, approved by the Order of the Ministry of Foreign Affairs of Ukraine No. 182 of 23 April 2018 "On Approval of the Regulation on the Consular Fee of Ukraine and the Instruction on the Procedure for Collecting the Amount of the Consular Fee for Consular Actions, Accounting for the Amount of Consular Revenues and Reconciliation of Actual Consular Revenues in Foreign	In the process of implementation

	Diplomatic Missions of Ukraine", by exempting from paying the consular fee wards of closed-type institutions that, due to armed aggression, are not allowed to receive consular services.	
1.	Initiate negotiations with the relevant ministries of education of the countries of residence of our citizens at the level of the MFA to discuss opportunities to simplify and speed up the procedure for the recognition of educational documents; reduce the financial costs associated with this procedure or establish preferential conditions for Ukrainian citizens affected by armed aggression; introduce temporary or simplified mechanisms for promptly obtaining equivalents of diplomas or certificates for Ukrainian citizens	Not implemented
2.	Continuously take measures to expand the list of intermediary countries to ensure the return of deported and forcibly displaced children to the territory of Ukraine by expanding the network of intermediary countries in the process of returning Ukrainian children	Not fulfilled
3.	Ensure that the competent authorities of Ukraine are informed through consular offices of cases of violation of children's rights by legal representatives outside Ukraine	Under implementation
4.	Introduce an effective mechanism to provide assistance to parents and other legal representatives whose children have been taken away from them abroad, including support, including: translation services when applying to institutions and organisations in the host country, legal support, and psychological support free of charge	In the process of implementation
5.	Ensure constant communication of representatives of consular offices directly with unaccompanied children abroad to monitor the observance of their rights and, if necessary, to promote the protection of their rights	In progress
To the Ministry of Justice of Ukraine:		

6.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to regulate the implementation of a mandatory comprehensive analysis of the current situation of minors in places of detention, including the level of education, social skills and psychological state	Not implemented
7.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Criminal Executive Code of Ukraine and the Law of Ukraine "On Pre-trial Detention" in order to enable: social service providers to visit penitentiary institutions and pre-trial detention facilities to meet the social needs of mothers with children held in pre-trial detention facilities	Not implemented
8.	To develop and implement a comprehensive programme to combat segregation and discrimination among prisoners and convicts in 2025-2027	Under implementation
9.	Ensure compliance with the established norm of space per prisoner/convict and bring the planned occupancy of penitentiary institutions and pre-trial detention centres in line with national and international standards	Not implemented
10.	To develop and implement a comprehensive programme to bring the conditions of detention in penitentiary institutions and pre-trial detention centres in line with national and international standards, which should include improvement of the material and technical base, repair works in cell blocks, replacement of communications, equipment with modern sanitary and hygiene facilities, introduction of video surveillance systems, ensuring proper lighting (natural and artificial), and compliance with sanitation and hygiene conditions	Not fulfilled
1.	Ensure integration of the penitentiary healthcare system into the single medical space of Ukraine	Under implementation
2.	To develop and implement a unified electronic system for registering bodily injuries of persons held in SPS institutions and reporting such cases to law enforcement agencies	Under implementation

3.	To develop and implement a comprehensive strategy and action plan for the development of mental health care in penitentiary institutions in accordance with modern standards of mental health care	In progress
4.	separately develop and implement an action plan to provide appropriate medical care for people with mental and behavioural disorders due to substance use, including the dissemination of substitution maintenance therapy programmes, therapeutic communities and other harm reduction programmes on the territory of SPS institutions	Under implementation
5.	Ensure systematic diagnosis and treatment of viral hepatitis C for all convicted and imprisoned persons who need it	Under implementation
6.	Develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Law of Ukraine "On Free Legal Aid" and include victims of hate crimes based on sexual orientation and gender identity in the list of persons entitled to free secondary legal aid	Not fulfilled
7.	Ensure access of Ukraine's foreign diplomatic missions to databases and the State Register of Civil Status Acts for the purpose of verification and identification of persons who resided in the territory of the Autonomous Republic of Crimea at the time of occupation and intend to return to Ukraine	Under implementation
8.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law to improve the provisions of Article 214 of the CPC of Ukraine in terms of ensuring legal certainty	Not implemented
9.	to develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the second paragraph of part four of Article 202 of the CPC of Ukraine and to the third sentence of part seven of Article 20 of the Law of Ukraine "On Pre-trial Detention" of 30.06.1993 No. 3352-XII in terms of replacing the words "working day" with "calendar day", which will reduce the time for verification of the document confirming the posting of bail as a preventive measure	Implemented

00.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law to regulate the procedure for the detention of persons subject to a preventive measure in the form of detention and persons sentenced to imprisonment who have the procedural status of suspects (accused) in other criminal proceedings, when security measures are applied to them, in accordance with international legal norms and standards for the treatment of prisoners	In the process of implementation
01.	Ensure a mechanism for representing the interests of children in conflict with the law outside Ukraine	Under implementation
To the Ministry of Environmental Protection and Natural Resources of Ukraine:		
02.	To develop and submit to the Cabinet of Ministers of Ukraine the regulatory acts, necessary for the implementation of the Law of Ukraine "On Waste Management"	In progress
To the Ministry of National Unity of Ukraine:		
03.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act that will provide for the approval of a strategy for the protection of the rights and freedoms of Ukrainian citizens who have left Ukraine due to the armed aggression of the Russian Federation and are in the territory of other states, as well as the creation of the necessary conditions for their return to the territory of Ukraine	Under implementation
04.	To develop and implement a state programme for the return of Ukrainian children and youth from abroad and their further reintegration into Ukrainian society, as well as programmes by creating a working group to develop a national concept	In the process of implementation
To the Ministry of Culture and Strategic Communications of Ukraine:		
05.	Together with other relevant ministries, develop and submit to the Cabinet of Ministers of Ukraine a draft law aimed at defining the	Under implementation

	status, principles and procedure for the use of Ukrainian sign language in Ukraine	
06.	Complete digitalisation of the museum infrastructure, including the creation of an information system for the Museum Fund of Ukraine	In progress
07.	Create and implement a general register of cultural property stolen from Ukraine during the war	In progress
08.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the procedure for determining the boundaries and modes of use of the historical area of a settlement, the procedure for the development, approval and publication of scientific project (research) documentation	Under implementation
09.	To develop scientific and project documentation for determining the boundaries and modes of use of buffer zones of UNESCO World Heritage sites	No longer relevant
The Ministry of Strategic Industries of Ukraine:		
10.	Introduce a system of training and briefings for critical infrastructure operators to improve the quality and accuracy of data entry into the Register of Critical Infrastructure Objects	Completed
To the Ministry of Economy of Ukraine:		
11.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution amending Resolution No. 303 of 13 March 2022 "On the Termination of State Supervision (Control) and State Market Supervision under Martial Law" to resume state supervision (control) measures in all territories that are not under military operations and are not occupied	In the process of implementation
To the Ministry of Internal Affairs of Ukraine:		
12.	To ensure the separation of the law enforcement function of combating illegal migration and administrative (service) services	Not implemented

	in the migration sphere by transferring the powers of the SMS in terms of enforcement measures (detention, documentation, escorting violators of the legislation on the legal status of foreigners, use of physical force and special measures) to the NPU bodies in accordance with their powers	
13.	To develop or amend the existing legal acts on the provision of food to foreigners under the control of the SMS/NPU officials/officers before placing them in the MAC; persons who are escorted to the border to execute decisions on forced expulsion; persons who are escorted to administrative courts to consider administrative cases and transferred to police or other law enforcement agencies to participate in procedural actions within the framework of criminal procedural legislation	In progress
14.	To submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Procedure for registration, issuance, exchange, transfer, withdrawal, return to the state, invalidation and destruction of the passport of a citizen of Ukraine for travelling abroad, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 152 of 07.05.2014	Implemented
The Ministry of Education and Science of Ukraine:		
15.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the introduction of a mechanism for the recognition of educational results by persons who resided in the TOT of Ukraine at the levels of complete general secondary education, vocational education, professional higher education, higher education, in accordance with the Law of Ukraine "On Amendments to Certain Laws of Ukraine on Recognition of Educational Results of Persons Residing in the Temporarily Occupied Territory of Ukraine" No. 3482-IX	Completed
16.	Introduce a comprehensive programme for the educational reintegration of children who were in the TOT of Ukraine or in the combat zone and outside Ukraine due to the	Completed

	armed aggression of the Russian Federation against Ukraine in order to eliminate educational gaps and integrate them into the national education system	
17.	To develop a mandatory educational programme for juveniles and minors in pre-trial detention centres and penitentiary institutions, adapted to their age, level of education and resocialisation needs	Implemented
18.	To develop and submit to the Cabinet of Ministers of Ukraine amendments to the Procedure for responding to cases of bullying (harassment), approved by the Order of the Minister of Education and Science of Ukraine No. 1646 of 28.12.2019, to determine the authorised body in the regions that will verify compliance with the requirements by responders in the event of a case of bullying (harassment) in educational institutions	Implemented
19.	To include the topics of personal data protection and cybersecurity in the educational programmes in general secondary education institutions	Done
20.	To approve the Regulation on the conditions of the Unified State Qualification Exam, which will regulate the issue of creating conditions for passing the USQE by persons with disabilities or special educational needs	In progress
21.	Bring the algorithm for establishing the sequence of levels of education used in the formation of a certificate of an education student according to the data of the USES in line with the current legislation in the field of education	Not implemented
22.	To carry out a comprehensive review of the remuneration conditions of pedagogical and scientific-pedagogical staff within the available financial resources and, taking into account the conditions of martial law, to bring the Law of Ukraine "On Education" in line with the requirements of the Constitution of Ukraine	In progress
The Ministry of Digital Transformation of Ukraine:		

23.	Develop and approve methodological recommendations for conducting information audit	In progress
To the Ministry of Finance of Ukraine:		
24.	Ensure sufficient funding for the purchase of blank certificates for certain categories of citizens to cover their actual needs	Under implementation
Ministry of Communities and Territories Development of Ukraine, Ministry of Digital Transformation of Ukraine:		
25.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to introduce a mechanism for accounting for real estate over which control or access to the TOT of Ukraine has been lost, as well as to provide for the possibility of submitting information about such property and the damage or destruction caused to it through the Diia portal	Not implemented
26.	Ensure the technical possibility of submitting information on real estate damaged and destroyed as a result of armed aggression against Ukraine since 19 February 2014 through the Diia portal	Not implemented
27.	Ensure that the State Register of Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine contains information on movable property and immovable non-residential property damaged or destroyed as a result of the armed aggression against Ukraine	Not fulfilled
Ministry of Communities and Territories Development of Ukraine, Ministry of Education and Science of Ukraine, Ministry of Social Policy of Ukraine:		
28.	Introduce a reintegration programme for youth from TOT of Ukraine, including psychological, social and financial assistance	Completed

Ministry of National Unity of Ukraine, Ministry of Foreign Affairs of Ukraine, Ministry of Education and Science of Ukraine:		
29.	Ensure that records are kept of children who are outside Ukraine and studying in foreign educational institutions and Ukrainian educational institutions, and that measures are taken to meet their national, cultural and linguistic needs	Implemented
The State Migration Service of Ukraine and the Ministry of Foreign Affairs of Ukraine:		
30.	Ensure identification and verification of the identity of persons who resided in the occupied territory of the Autonomous Republic of Crimea and intend to return to the territory controlled by the Government of Ukraine, for further documentation with a certificate of return to Ukraine and issuance of a passport of a citizen of Ukraine	Not implemented
31.	To develop an algorithm of interaction during identification and establishment of identity of persons, registration and issuance of passport documents or a certificate of return to Ukraine to persons who resided in the occupied territory of the Autonomous Republic of Crimea	Not fulfilled
The Ministry of Social Policy of Ukraine, the Pension Fund of Ukraine:		
32.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act to approve the procedure for paying pensions to citizens temporarily outside the country, introducing annual physical identification for the relevant persons, in accordance with Article 47 ¹ of the Law of Ukraine "On Compulsory State Pension Insurance"	Completed
33.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act on amendments to the Procedure for Payment of Pensions and Financial Assistance through Current Bank Accounts, approved by the Resolution of the Cabinet of Ministers of	Completed

	Ukraine of 30 August 1999 No. 1596 "On Approval of the Procedure for Payment of Pensions and Financial Assistance through Current Bank Accounts", which will provide for a simplified procedure for resumption of pension payments for wards of closed institutions, taking into account their current social status and financial situation.	
Ministry of Defence of Ukraine, Ministry of Internal Affairs of Ukraine, State Migration Service of Ukraine:		
34.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act that will determine the mechanism for issuing (in particular, replacing a lost or stolen) and exchanging a passport of a citizen of Ukraine and a passport of a citizen of Ukraine for travelling abroad, in particular abroad for persons whose applications for issuance were submitted before the entry into force of the Law of Ukraine "On Mobilisation Preparation and Mobilisation" of 11 April 2024	Implemented
35.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act on amendments to the Procedure for organising and maintaining military registration of conscripts, persons liable for military service and reservists, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 921 of 07 December 2016, which will provide for the definition of a mechanism for remote updating/entering of military registration data for persons of mobilisation age who are abroad	Done
Ministry of Finance of Ukraine, Ministry of Social Policy of Ukraine, Pension Fund of Ukraine:		
36.	To take measures to ensure repayment of pension and social payments arrears under the decisions of national courts	Not fulfilled
To the Ministry of Health of Ukraine, regional and Kyiv city state administrations:		

37.	Develop and implement regional programmes of social and psychological support for patients suffering from rare (orphan) diseases	Under implementation
The Ministry of Justice of Ukraine, the Ministry of Digital Transformation of Ukraine, the Ministry of Community and Territorial Development of Ukraine, the Ministry of Social Policy of Ukraine, regional military administrations and local governments:		
38.	Ensure cooperation with the Register of damages caused by the aggression of the Russian Federation against Ukraine, as well as informing citizens, regardless of their place of residence, about the possibility of submitting applications to the Register of damages caused by the aggression of the Russian Federation against Ukraine in various categories as they are opened	Implemented
Ministry of Social Policy of Ukraine, Ministry of Internal Affairs of Ukraine:		
39.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Criminal Code of Ukraine to increase responsibility for crimes against children (in particular by establishing a qualifying feature for committing a crime against a child in institutional care and education)	Under implementation
40.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Criminal Code of Ukraine to establish liability for unauthorised change of residence of a minor child by one of the parents	In progress
41.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Criminal Code of Ukraine aimed at limiting the application of imprisonment to minors, applying it only in exceptional cases defined by an exhaustive list of grave and especially grave crimes	In the process of implementation
42.	Introduce a special mechanism for cases of conflict of interest with the legal representative: provide that if there is a	In the process of implementation

	suspicion that the child's legal representative may be an interested party (for example, in cases of domestic violence or by officials of institutions), an independent representative (lawyer or specially authorised employee of the guardianship and custody authority) must be appointed for the child	
43.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to the Code of Administrative Offences and the Law of Ukraine "On State Regulation of Production and Circulation of Ethyl Alcohol, Alcohol Distillates, Bioethanol, Alcoholic Beverages, Tobacco Products, Tobacco Raw Materials, Liquids Used in Electronic Cigarettes and Fuel", which regulate the activities of business entities in the field of sale of alcohol and tobacco products, namely to increase the responsibility of business entities for the sale of beer (except for non-alcoholic), alcoholic, low-alcohol beverages, tobacco products, electronic cigarettes and liquids used in electronic cigarettes, devices for the consumption of tobacco products without their combustion to minors	In progress
Ministry of Social Policy of Ukraine, Ministry of Justice of Ukraine:		
44.	Develop a state programme for the prevention of juvenile delinquency for 2025-2027	In progress
45.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law on amendments to Article 226 of the Tax Code of Ukraine regarding the mandatory involvement of psychologists from the Register of Psychologists involved in criminal proceedings involving minors through regional/interregional centres for free legal aid to ensure the interests of the child during any procedural actions, and regardless of the status, nature of the crime and age of the child	Implemented
Ministry of Social Policy of Ukraine, Ministry of Health of Ukraine:		

46.	Establish and ensure the operation of interagency commissions with the participation of representatives of the Ministry of Social Policy, the Ministry of Health, the National Social Service, the State Service of Ukraine for Children, and the LEAs to conduct visits to institutions where children are placed for round-the-clock stay in order to analyse children's personal files, formulate and implement individual plans for the social protection of children, analyse the feasibility of their placement in institutions for round-the-clock stay, assess the quality of medical care, check children's diagnoses, and so on.	Implemented
Ministry of Communities and Territories Development of Ukraine, Ministry of Social Policy of Ukraine, Ministry of Finance of Ukraine, Ministry of Economy of Ukraine:		
47.	To develop a state standard for the provision of social services for the arrangement of housing for persons with disabilities	Completed
48.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on approval of the Concept of the State Targeted Programme for the Exchange of Housing for Persons with Disabilities in Case of Impossibility of Adapting it to Their Needs	In progress
The Ministry of Social Policy of Ukraine and the Ministry of Digital Transformation of Ukraine:		
49.	To develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Procedure for registration and issuance of a certificate of registration of an internally displaced person, approved by the Cabinet of Ministers of Ukraine on 01.10.2014 No. 509, in terms of the possibility to provide for the choice of reasons for deregistration through the mobile application of the Diia portal	Implemented
The Ministry of Defence of Ukraine, the Ministry of Justice of Ukraine, the Ministry of Finance of Ukraine jointly with the National Bank of Ukraine:		

50.	To develop and submit to the Cabinet of Ministers of Ukraine a draft law of Ukraine prohibiting banks and financial institutions during the period of martial law in Ukraine and six months after the month in which martial law is terminated or cancelled from taking any actions to force servicemen to pay off loan arrears, to file lawsuits, to collect debt by force	Not fulfilled
Ministry of Digital Transformation of Ukraine, Ministry of Internal Affairs of Ukraine:		
51.	To analyse the feasibility of expanding the functionality of the Unified State Web Portal of Electronic Services (Portal Diia) by adding a service for quick call of the police in case of domestic and/or gender-based violence	In the process of implementation
Secretariat of the Commissioner for Persons Missing in Special Circumstances:		
52.	In cooperation with the competent state authorities, ensure implementation and coordination of an information campaign in the oblasts (regions) of Ukraine and abroad aimed at raising public awareness of the algorithm of appeals of relatives, legal representatives to state bodies and organisations involved in the search for civilians missing under special circumstances	Completed
53.	In cooperation with the competent state authorities, submit proposals for the establishment of a "single information window" at the competent state body for effective communication and consultations of relatives and legal representatives of persons missing under special circumstances	Implemented
The Office of the Prosecutor General:		

54.	Ensure constant and systematic maintenance of statistics and records of criminal proceedings on crimes committed against children, including by their legal representatives	Completed
Office of the Prosecutor General, National Police of Ukraine, State Bureau of Investigation:		
55.	To analyse the practice, including judicial, of considering in 2024 complaints against inaction of authorised persons, which consisted of failure to enter information into the URPTI after receiving applications and reports of criminal offences	Under implementation
56.	Ensure systematic monitoring of compliance with the requirements of Art. 214 of the CPC of Ukraine regarding the timeframe for providing an extract from the URPTI, in particular to applicants from among close relatives and family members of persons who went missing under special circumstances	Under implementation
The State Service for Special Communications and Information Protection of Ukraine, the National Police of Ukraine, the Security Service of Ukraine, the Ministry of Defence of Ukraine, the National Bank of Ukraine:		
57.	To develop and implement preventive, organisational and educational measures in the field of cybersecurity and cyber defence to prevent unauthorised access to personal data	Completed
The State Service of Ukraine for Children:		
58.	Ensure the publication of operational, as well as quarterly and annual statistical data on the number of orphans, children deprived of parental care, candidates for adoption, and family-based care on the official website of the State Service of Ukraine for Children	In progress
The State Service of Ukraine for Ethnic Policy and Freedom of Conscience:		

59.	Together with representatives of ministries and agencies, to develop and submit in accordance with the established procedure a draft law on alternative (non-military) service in a new version, which would regulate the issue of replacing the performance of military duty by citizens under martial law with alternative (non-military) service, or as an alternative solution to the issue - to develop a draft law on amendments to Article 23 of the Law of Ukraine "On mobilisation training and mobilisation", which would define the grounds for granting a deferral from military service and the conditions for the	Not implemented
To the State Migration Service of Ukraine:		
60.	To stop the practice of applying coercive measures (physical force) to detained foreigners and stateless persons by the SMS officials, which leads to facts of abuse of power	Not implemented
61.	To stop the practice of holding foreigners and stateless persons in temporary holding facilities for more than 72 hours without a court order to detain them	Not implemented
62.	Ensure that SMS officials immediately inform regional centres for free legal aid in each case of detention of a foreigner for more than three hours for the purpose of his/her forced return or for the purpose of identification and enforcement of forced expulsion	Implemented
63.	Ensure the right of access to interpreter services for foreigners and stateless persons detained by the SMS officials	Implemented
64.	Conduct awareness-raising campaigns for members of the Roma national minority (community) in places of their compact residence in cooperation with local authorities on the importance of obtaining identity documents confirming Ukrainian citizenship or special status	Under implementation
65.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act to simplify the procedure for confirming the legality of stay	Implemented

	in Ukraine for family members of Ukrainian citizens who were members of the Armed Forces of Ukraine, the State Special Transport Service or the National Guard of Ukraine and who died in the line of duty	
66.	Ensure proper functioning of separate subdivisions of the SE "Document" abroad	In the process of implementation
67.	Ensure the issuance of passport documents through separate subdivisions of the SE "Document" abroad in accordance with the procedure and on terms and conditions determined by the current legislation of Ukraine	Under implementation
The State Judicial Administration of Ukraine:		
68.	To audit court premises located in residential buildings and take urgent measures to ensure isolation and autonomous functioning of courts by moving them to a separate building or administrative complex that meets national standards	Implemented
69.	To develop a comprehensive programme of proper access to justice, which provides for the equipment of cells for accused (defendants) convicted of at least 4 m ² in all courts, with three cells per courtroom for the consideration of criminal cases, and the escorting of accused (defendants) convicted to courtrooms via isolated routes	In progress
70.	Amend the Instruction on Record Keeping in Local and Appellate Courts of Ukraine, approved by the Order of the State Judicial Administration of Ukraine No. 814 of 20.08.2019, to define the procedure for issuing enforcement documents by courts whose territorial jurisdiction has been changed, as well as the procedure for applying for enforcement of court decisions of courts whose territorial jurisdiction has been changed	Not implemented
The State Emergency Service:		
71.	To introduce a state quality standard for personal protective equipment for children (bulletproof vests and helmets) used during	Not fulfilled

	evacuation measures, to provide personal protective equipment for children under 4 years of age during evacuation	
State Treasury Service of Ukraine, State Judicial Administration of Ukraine, Ministry of Justice of Ukraine:		
72.	Complete setting up the electronic information and communication system of interaction to ensure round-the-clock exchange of data on deposits to a special account in case of bail as a measure of restraint	Under implementation
Heads of local general courts:		
73.	Ensure systematic verification (monitoring) of compliance with the law in courts in terms of timely enforcement of rulings of investigating judges	In progress
The HQCJ and the HCJ:		
74.	In making decisions on judicial career, organisation of work of individual courts, "levelling" of judicial workload, take into account the need for the state to ensure the right of litigants to have their case considered within a reasonable time, in particular in court cases that have been in proceedings for a long time	In the process of implementation
To the National Agency of Ukraine on Civil Service:		
75.	Introduce a training course for civil servants and local self-government officials on personal data protection and cybersecurity	Under implementation
76.	Introduce a standard general training programme for civil servants and local self-government officials on information audit, formation and publication of open data sets in accordance with the requirements of the Law of Ukraine "On Access to Public Information" and the Resolution of the Cabinet of Ministers of Ukraine No. 835 of 21 October 2015 "On Approval of the Regulation on Data Sets to be Published in the Form of Open Data"	Completed

The National Social Service of Ukraine:		
77.	Ensure the implementation of measures of state supervision (control) of penitentiary institutions to ensure control/monitoring of the rights of mothers with children held in penitentiary institutions and places of pre-trial detention	Not implemented
78.	To organise and conduct repeated inspections of compliance with the legislation in the provision of social services, in particular those institutions, which were visited and submitted to the Commissioner	Not implemented
79.	Ensure systematic interaction with diplomatic missions and representations abroad on issues related to unaccompanied children	Implementation of this recommendation is underway
The National Health Service of Ukraine:		
80.	Introduce a coefficient for calculating payment for the provision of care to orphan patients under the medical guarantee programme	Done
To the National Police of Ukraine:		
81.	To publish recommendations for Internet users, including messengers and mobile applications, on security measures against fraudulent activities	Done to the National Police of Ukraine: 181.
82.	Ensure that information on criminal offences falling under the jurisdiction of the State Bureau of Investigation is entered into the Unified Register of Pre-trial Investigations and that the territorial offices of the State Bureau of Investigation are promptly informed of the facts of use of physical force by police officers against citizens	Not implemented
83.	To develop and implement a comprehensive programme to bring the conditions of detention in temporary detention centres in line with national and international standards, which should include improvement of material and technical base, repair works in	In progress

	cellular premises, replacement of communications, equipment with modern sanitary and hygienic facilities, introduction of video surveillance systems, ensuring proper lighting (natural and artificial), and compliance with sanitation and hygiene conditions	
84.	To develop and approve departmental regulations that provide for the establishment and operation of institutions for detention of persons subject to administrative arrest and held in custody for more than 72 hours, as well as to expand the range and frequency of available activities during the detention of such persons in temporary detention centres by introducing the following: educational programmes (short-term courses, lectures, trainings); cultural events (watching films, organising creative activities); psychological support (providing consultations by psychologists or social workers)	Not fulfilled
85.	To keep records and analyse complaints against actions or inaction of the National Police officers in case of violation of special measures to combat domestic violence by perpetrators	In progress
Odesa Regional State Administration, Mykolaiv City Council:		
86.	To develop and approve state monitoring programmes in the field of atmospheric air protection	Under implementation
Zaporizhzhia, Mykolaiv, Poltava CMAs, Odesa and Kharkiv city councils:		
87.	To approve state monitoring programmes in the field of atmospheric air protection	Completed
Donetsk, Zaporizhzhia, Mykolaiv, Sumy, Kharkiv, and Kherson regional military administrations:		
88.	To take measures to provide evacuation groups with armoured vehicles and personal protective equipment for children to ensure safe evacuation of children from the areas of active hostilities	Under implementation

Volyn, Zakarpattia, Lviv, Odesa regional military administrations:		
89.	To reorganise shelters of children's services (if available on the territory of the region) into centres for social and psychological rehabilitation of children or centres for social support of children and families by 2025	Under implementation
Regional, Kyiv city state administrations (military administrations), local self-government bodies:		
90.	Immediately relocate institutions or evacuate persons held in places of detention located in the area of active hostilities or in settlements close to it, as well as in the area less than 50 km from the state border with the Russian Federation, to appropriate institutions or facilities located in a safe area	Implemented
91.	To take measures to organise and control the arrangement, operation and maintenance of civil protection facilities in residential social protection institutions	Under implementation
92.	Ensure control over the compliance of institutions with the norms of space per person in accordance with the State Construction Norms of Ukraine B.2.2-18:2007 "Buildings and structures. Institutions of social protection of the population"	In progress
93.	Consider the possibility of moving institutions where it is impossible to carry out re-equipment to ensure inclusiveness in accordance with the current legislative requirements to buildings that are architecturally able to provide arrangement in accordance with the State Building Standards and inclusiveness requirements	In the process of implementation
94.	Facilitate the inspection by competent authorities of the condition of shelters and premises used by institutions as shelters and obtaining inspection reports on these premises by relevant commissions involving territorial bodies of the State Emergency Service of Ukraine	Completed

95.	Ensure cooperation between actors involved in preventing and combating domestic violence, including regular meetings of coordination councils at the regional and local levels	Under implementation
96.	Ensure the availability of specialists who have undergone appropriate training and implement programmes for offenders in each region	Ongoing
97.	Ensure that citizens are informed about existing mechanisms for responding to cases of CRSV and guaranteed assistance to victims, including by posting information on this topic on official websites of administrations	In progress
98.	Implement an information campaign aimed at informing representatives of national minorities (communities) about the scope of their rights guaranteed by the Law of Ukraine "On National Minorities (Communities) of Ukraine"	Not implemented
99.	Ensure that community members can exercise their right to participate in the management of public affairs, in particular through participation in public hearings, decision-making on changing the names of place names	Not fulfilled
00.	Create an open platform where residents can propose new names and discuss them before making decisions	Done
01.	Develop and approve measures to provide children with rare (orphan) diseases with medicines and appropriate food products for special dietary nutrition procured from the local budget	Under implementation
02.	Ensure the introduction of the maintenance and generalisation of quantitative indicators on children with rare (orphan) diseases and their needs for special dietary nutrition, as well as medicines	In progress
03.	Ensure that when preparing draft local budgets, expenditures are provided for financing measures to provide children with rare (orphan) diseases with medicines and appropriate food products, taking into account the financial capacity of local budgets	In the process of implementation

VINNYTSIA REGION		
Vinnytsia Oblast State Administration:		
04.	Ensure that the information provided for by the Law of Ukraine "On Access to Public Information" and schedules of personal reception of citizens are published on official websites	Completed
To local self-government bodies:		
05.	Ensure publication on official websites of information provided for by the Law of Ukraine 'On Access to Public Information' and schedules of personal reception of citizens	Under implementation
06.	take measures to fill vacant positions of social work specialists in the relevant institutions, establishments that carry out social work and provide social services to vulnerable groups of the population of the region, and to fill vacant positions in the services for children in the region, where they are not filled, in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	In progress
VOLYN REGION		
Volyn regional military administration:		
07.	To bring the living conditions of internally displaced persons in the ICC in line with the Procedure for the functioning of places of temporary residence of internally displaced persons approved by the Resolution of the Cabinet of Ministers of Ukraine of 1 September 2023 No. 930	Completed
08.	Ensure accessibility to temporary accommodation for persons with disabilities	Under implementation

Local self-government bodies:		
09.	To publish on the official websites of the territorial communities of Volyn region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Under implementation
10.	Bring the staffing level of children's services in the territorial communities of Volyn Oblast in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Article 12 of the Law of Ukraine No. 2342-IV of 13.01.2005 "On Ensuring Organisational and Legal Conditions for Social Protection of Orphans and Children Deprived of Parental Care"	In the process of implementation
11.	To strengthen control over the observance of the rights of children in difficult life circumstances, orphans and children deprived of parental care	Under implementation
DNIPROPETROVSKA OBLAST		
Dnipro regional military administration:		
12.	To bring temporary accommodation for internally displaced persons in line with the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930	In progress
13.	Provide organisational and methodological assistance to community children's services on the formation, alignment of personal files of orphans and children deprived of parental care with the requirements of the current legislation; obtaining access to the information resources of the Unified Electronic Database of Information on Orphans, Children Deprived of Parental Care and Families of Potential Adopters, Guardians, Foster Parents,	Completed

	and Foster Parents for the purpose of accumulation, storage, accounting, search and use of data on children who have left	
State and local authorities:		
14.	To regularly publish on the official websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Done
15.	Ensure that information on the procedure for exercising the right of citizens to appeal is posted in an accessible format on the official website and in the premises of the institution. Provide an opportunity to submit oral appeals via the telephone network with mandatory recording of such appeals	Completed
16.	To publish on the official website information of public interest, including information on the procedure for submitting requests for information, the procedure for appealing decisions, actions or inaction, information on vacancies and competition conditions, as well as places where the necessary forms and blanks can be obtained	Completed
17.	Ensure compliance with the requirements to publish open data on relevant state web portals, including information on the use of public funds	Completed
18.	Ensure that the information stand is updated with relevant materials on the procedure for receiving and submitting requests for public information	Done
19.	Identify and equip a special place for requesters to work with documents and their copies, providing the possibility to read, extract, photograph, copy, scan and save information on any media	Completed
Services for children of territorial communities, regional/district/city/township/village military administrations:		
20.	To properly and timely enter information into the Unified Data Bank on orphans, children	Completed

	deprived of parental care and families of potential adoptive parents, guardians, foster parents, foster carers	
21.	Ensure housing and property rights and interests of children and persons from among orphans and children deprived of parental care	Completed
22.	Ensure that personal files are organized in accordance with the Procedure for keeping personal files of orphans and children deprived of parental care, approved by the Order of the Ministry of Ukraine for Family, Youth and Sports of 18.11.2008 No. 459	Implemented
23.	To develop, implement, systematically review and adjust individual social protection plans to ensure that the planned measures are in line with the interests of the child, as well as individual plans for the provision of social services, including a plan for social support of the child's family	Implemented
24.	Organise the implementation by the guardianship and custody authority of the Procedure for granting the status of a child affected by hostilities and armed conflicts, approved by the Resolution of the Cabinet of Ministers of Ukraine of 05.04.2017 No. 268	Completed
DONETSK AND LUHANSK REGIONS		
Donetsk regional military administration:		
25.	Together with international organisations and regional state and military administrations that receive evacuees with children from Donetsk region, work on the issue of systematic reintegration of such families and ongoing support for their adaptation to the new environment	In progress
26.	Conduct an inspection into the circumstances of improper implementation of monitoring initiatives by the management of the Centre for Social and Psychological Rehabilitation of Children of the Service for Children of Kramatorsk City Council in accordance with the Order of the Ministry of	Completed

	Social Policy of Ukraine of 25 July 2023 No. 260-N	
To local self-government bodies:		
27.	To timely publish on the websites of the territorial communities of the region the information provided for in Article 15 of the Law of Ukraine "On Access to Public Information"	Done
28.	Ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals, taking into account the conditions of martial law (personal reception, in particular with the use of modern communication systems, in safe spaces, etc.)	Completed
ZHYTOMYR REGION		
Zhytomyr Regional Military Administration:		
29.	Ensure accessibility of municipal and state-owned institutions for persons with disabilities	Completed
30.	Analyse the living conditions in the places of temporary residence included in the list of places of temporary residence in Zhytomyr region and, if inadequate living conditions for IDPs are identified, take measures to improve them	Completed
To the local self-government bodies:		
31.	To publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Done
32.	To bring the number of employees of the services for children in the territorial communities of Zhytomyr region in line with the number of children in the territorial communities, as required by Article 4 of the	In progress

	Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	
33.	Ensure an appropriate level of openness and transparency in the activities, timely publish documents related to the budget and other socially important issues	In progress
34.	Ensure the readiness for use and accessibility of shelters, including healthcare facilities	Completed
Services for children of territorial communities, regional/district/city/township/village military administrations:		
35.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering them in housing registers	Under implementation
36.	Thoroughly check all personal files of orphans and children deprived of parental care to identify and eliminate any discrepancies	In progress
37.	Ensure the availability of a complete package of documents, including certified copies of birth certificates, passports, medical certificates on the health status of children and guardians	In progress
38.	Ensure that plans reflect children's current educational, health and development needs	In progress
39.	Ensure the availability of documents confirming the fact that children receive relevant social benefits	In progress
40.	To publish complete and up-to-date information on the official websites of the Services, including contact details and the schedule of reception of citizens	In progress
41.	Ensure the possibility of receiving consultations online	Done
Environmental supervisory authorities and utility companies:		
42.	Conduct an independent audit of the state of water treatment facilities and take measures to modernise them	Under implementation
43.	Introduce regular monitoring of the quality of drinking water and ensure timely elimination of identified deficiencies	Under implementation

State authorities, local self-government bodies:		
44.	Allocate and properly equip parking spaces for persons with disabilities or persons transporting them near subordinate facilities	Completed
45.	Ensure that contrasting markings are applied to stairs, ramps, transparent door leaves, and tactile information elements	Done
46.	Adapt websites and other information resources for use by persons with visual, musculoskeletal, speech and intellectual disabilities, as well as with various combinations of disabilities	Implemented
47.	Remove architectural barriers that impede the movement of people with reduced mobility in buildings	Done
ZAKARPATTIA REGION		
Transcarpathian Regional State Administration - Transcarpathian Regional Military Administration:		
48.	to analyse the status of the pilot project on dental prosthetics for certain categories of persons who defended the independence, sovereignty and territorial integrity of Ukraine on a monthly basis and to carry out awareness-raising activities to explain the possibility of receiving such services free of charge	Completed
49.	Monitor the MCCs for their compliance with the standards set out in the Procedure and, if it is impossible to eliminate the deficiencies, relocate IDPs to other places of temporary residence or buildings or premises suitable for living, if there are vacant places and they meet the minimum requirements set out in paragraph 8 of this Procedure	Completed
50.	Ensure, in cooperation with local authorities, international and national non-governmental organisations (upon agreement), within their competence, that living conditions	Completed

	in places of temporary residence meet the requirements of Resolution No. 930	
Territorial communities of the region where the ICCs are located:		
51.	Implement measures aimed at improving the living conditions in the TACs, in accordance with the norms defined by the Procedure for the functioning of temporary accommodation places for internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of temporary accommodation places for internally displaced persons" dated 01.09.2023	In the process of implementation
The Main Department of the National Social Service in Zakarpattia region:		
52.	By 2025, to check the elimination of identified violations in privately owned nursing homes for the elderly	Under implementation
53.	to check the elimination of identified violations of children's rights in the Shelter for Children of the SES of the Transcarpathian Regional Military Administration	Under implementation
54.	To check the state of observance of human rights in the provision of social services in territorial communities where no social service provider has been established	In progress
55.	To conduct an audit of the observance of children's rights in territorial communities where the number of staff of the SFC and CNSC does not meet the requirements of the current legislation	Under implementation
Local self-government bodies (territorial communities):		
56.	To take urgent measures to fill vacant positions of social work specialists in the relevant institutions, establishments that carry out social work and provide social services to vulnerable groups of the population of the region and to fill vacant positions in the regional children's services where they are not filled, in	Under implementation

	accordance with Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" of 24.01.1995 No. 20/95-BP	
57.	Ensure that measures are taken to control the maintenance of documentation in children's services in accordance with the requirements of current legislation	Under implementation
Service for Children of the Transcarpathian Regional State Administration - Transcarpathian Regional Military Administration:		
58.	Together with territorial communities to take urgent measures to fill vacant positions in the services for children in the region where they are not filled, in accordance with Article 4 of the Law of Ukraine "On bodies and services for children and special institutions for children" of 24.01.1995, No. 20/95-BP	Under implementation
59.	Implement measures (education, training) to improve the skills of employees of services in territorial communities	Under implementation
60.	To organise and implement, together with the authorised units of the National Police of Ukraine, measures for the social protection of children, identification of the causes of child neglect and homelessness, begging, and prevention of child delinquency	Completed
ZAPORIZHZHIA REGION		
Zaporizhzhia regional military administration:		
61.	Adapt the MCC to the needs of people with limited mobility, provide the necessary household appliances to meet the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023	Completed
62.	Develop and implement a unified algorithm for settlement and change of temporary residence of IDPs within the region	Completed

Zaporizhzhia city council:		
63.	Ensure the preparation of a programme for the phased reduction of emissions of pollutants by business entities	Done
64.	Develop a methodology for calculating the rent for municipal property of Zaporizhzhia city territorial community, taking into account the existing needs of Zaporizhzhia social service providers for preferential rent	Under implementation
Local self-government bodies of Zaporizhzhia oblast:		
65.	To publish on the websites of the territorial communities of Zaporizhzhia region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Under implementation
66.	Ensure that the property rights of orphans and children in difficult life circumstances are exercised by the services for children of the territorial communities of Zaporizhzhia region	Under implementation
IVANO-FRANKIVSK REGION		
Ivano-Frankivsk regional administration:		
67.	take measures to ensure the provision of social care, palliative care and supported living services to citizens in need, taking into account the needs of the population of the region for social services, in particular by expanding the network of social protection institutions, increasing the number of social workers or engaging non-governmental social service providers	Completed
68.	Provide training for employees of residential social care institutions on human rights, prevention of torture and other cruel, inhuman or degrading treatment	Implemented
69.	To take measures to ensure control over the cooperation of social service providers with healthcare institutions in providing primary and specialised medical care to wards/inmates, as	Completed

	well as the quality of organisation and examination of wards by expert teams to assess the daily functioning of a person in order to establish their disability, if necessary, and provide them with individual rehabilitation programmes in accordance with the law	
70.	To inspect the activities of guardianship and custody authorities in accordance with clause 1.9. of the Rules of Guardianship and Trusteeship approved by joint order No. 34/166/131/88 of 26.05.1999, on monitoring the performance by guardians of their duties in relation to incapacitated persons	In the process of implementation
Local self-government bodies:		
71.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering citizens who, in accordance with the law, need to improve their living conditions and ensuring the maintenance of apartment records	Completed
Ivano-Frankivsk regional CCC and JV:		
72.	Ensure strict implementation of the legislation on citizens' appeals, access to public information and protection of personal data, and take measures to improve the skills of employees in this area	Completed
73.	To take measures to prevent human rights violations during the conscription of citizens for military service in the process of mobilisation for a special period	Completed
KYIV AND KYIV REGION		
To local self-government bodies:		
74.	To regularly publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Completed

75.	Ensure that information on the procedure for exercising the right of citizens to appeal is posted in an accessible format on the official website and in the premises of the institution	Done
76.	Ensure compliance with the requirements to publish open data on relevant state web portals, including information on the use of public funds	Completed
KIROVOHRAD REGION		
Kirovohrad Regional Military Administration:		
77.	To bring the existing places of compact settlement in the territories of communities of Kirovohrad region in line with the requirements of the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023 "Some issues of functioning of places of temporary residence of internally displaced persons"	In the process of implementation
78.	Ensure employment of persons/doctors in places of detention and create additional guarantees for employment	In progress
Local self-government bodies of Kirovohrad region:		
79.	To bring the number of employees of the services for children in the territorial communities of Kirovohrad region in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	In progress
Services for children of territorial communities, regional/district/city/township/village military administrations:		
80.	To take measures to fill vacant positions of social work specialists in relevant institutions, establishments that carry out social work and provide social services to vulnerable groups of the population of the region and to fill vacant positions in the services for children of	Under implementation

	the region, where they are not filled, in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	
81.	Ensure the realisation of property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities, preservation of the right to use, establishment of custody of the child's property and taking appropriate control measures over the award of alimony and its collection	In progress
LVIV REGION		
Lviv regional military administration:		
82.	To carry out a systematic analysis of observance of the rights of persons and conditions of their stay in subordinate institutional institutions of social protection and healthcare, in particular in boarding schools, geriatric boarding houses and children's institutions, taking into account the security situation and legal requirements for the proper level of social services	In progress
Lviv Regional Council:		
83.	Ensure accessibility of municipal facilities and institutions for people with reduced mobility by approving an action plan with deadlines and responsible persons, installing means of unimpeded access, and providing for the costs of implementing these measures	Under implementation
Local self-government bodies of Lviv region:		
84.	To publish on the websites of territorial communities of Lviv region the information	In progress

	required by the legislation of Ukraine, in particular, on: the procedure for access to public information, reports on consideration of requests for information, the list and conditions for obtaining administrative services, the procedure for appealing against decisions of information managers, data sets to be published in the form of open data, work schedule and schedule of reception of citizens, procedure and terms for consideration of citizens' appeals, decisions of local councils and their executive bodies, draft regulatory acts	
85.	To match the number of staff of children's services in the territorial communities of Lviv region with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	Under implementation
86.	Ensure accessibility of municipal facilities for people with limited mobility by auditing the architectural accessibility of facilities, approving an action plan with deadlines and responsible persons, installing unimpeded access, including ramps, lifts, ensuring universal design of sanitary facilities and providing for the costs of implementing these measures	In the process of implementation
MYKOLAIV REGION		
Mykolaiv regional military administration:		
87.	To bring temporary accommodation facilities in Mykolaiv region into compliance with the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023	Completed
88.	Ensure that servicemen, veterans and their families, as well as the families of the deceased, are informed about social support measures and relevant programmes and projects implemented in the region	Completed

To local self-government bodies:		
89.	To publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Done
90.	To bring the number of employees of the services for children in the territorial communities of Mykolaiv region in line with the number of children in the territorial communities, as required by Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	In progress
91.	Take measures to control the maintenance of documentation in the services for children in accordance with the requirements of the current legislation	Under implementation
92.	Ensure that the property rights of orphans and children in difficult life circumstances are exercised by the services for children of territorial communities in Mykolaiv region	Completed
93.	Ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals, taking into account the conditions of martial law (personal reception via video conferencing, in safe spaces, etc.)	Completed
94.	Ensure that servicemen, veterans and members of and their families, as well as the families of the deceased, are informed about social support measures and relevant programmes and projects implemented in the territorial communities of the region and in Mykolaiv	Completed
Services for children of territorial communities, regional/district/city/township/village military administrations:		
95.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering them in the housing register	Completed
96.	Ensure protection and prevent the dissemination of confidential information	Completed

	(personal data of children) registered with the state	
ODESA REGION		
Odesa Regional State Administration - Rivne Regional Military Administration:		
97.	Ensure full compliance with the requirements of the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information" regarding the publication of information on official websites	Completed
Local self-government bodies:		
98.	To publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Done
99.	To match the number of employees of the services for children in the territorial communities of Odesa Oblast with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	Completed
00.	Ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals from , taking into account the conditions of martial law (personal reception via video conference, in safe spaces, etc.)	In the process of implementation
01.	Ensure that servicemen, veterans and their families, as well as the families of the deceased, are informed about social support measures and relevant programmes and projects implemented in the territorial communities of the region and Odesa	Completed
Services for children of territorial communities, regional/district/city/township/village military administrations:		

02.	To take control over the implementation of Article 4 of the Law of Ukraine No. 609-V of 07 February 2007 "On bodies and services for children and special institutions for children" - the issue of expansion and staffing	Implemented
03.	To take measures to ensure that the personal files of children registered with the services are fully completed in accordance with the current legislation	Under implementation
Healthcare institutions of Odesa region:		
04.	Ensure funding for nutrition of children in children's wards, taking into account the individual needs of each child to ensure the right of the child to a standard of living sufficient for physical, intellectual and moral development	Achieved
To state and local authorities:		
05.	allocate and properly equip parking spaces for persons with disabilities or persons transporting them near subordinate facilities	In progress
06.	Ensure that contrasting markings are applied to stairs, ramps, transparent door leaves, and tactile information elements	In the process of implementation
07.	Remove architectural barriers that impede the movement of people with reduced mobility in buildings	In progress
POLTAVA REGION		
Poltava regional military administration:		
08.	Monitor the ICCs included in the list of temporary accommodation places in Poltava region, approved by the order of the Head of the Poltava Regional Military Administration on 6.11.2023 No. 731, for their compliance with the standards set out in the Procedure for the functioning of temporary accommodation places for internally displaced persons, approved by the Resolution of the Cabinet of	In progress

	Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of temporary accommodation places for internally displaced persons" and take measures in case of detection of inadequate living conditions for IDPs,	
09.	To bring into line with the requirements of the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 the existing places of compact settlement in the territories of communities of Poltava region that are not included in the list of places of temporary residence and where internally displaced persons live, with further inclusion of such places in the list	Under implementation
10.	Ensure that shelters, including healthcare facilities, are ready for use and accessible	In progress
To local authorities:		
11.	To publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Done
12.	Ensure funding for nutrition of children in children's departments of healthcare institutions, taking into account the individual needs of each child and to ensure the right of the child to a standard of living sufficient for physical, intellectual and moral development	Implemented
13.	To take measures to control the maintenance of documentation in children's services in accordance with the requirements of the current legislation	Completed.
Services for children of the regional military administration, district military administrations and territorial communities:		
14.	Ensure the realisation of property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities, preservation of the right to use, establishment of custody of the child's property and taking appropriate control	Completed

	measures over the appointment of alimony and its recovery	
RIVNE REGION		
Rivne Regional State Administration - Rivne Regional Military Administration:		
15.	To take measures aimed at improving the living conditions of internally displaced persons in places of temporary residence, in accordance with the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons" of 01.09.2023	Under implementation
16.	Ensure that healthcare, education, social protection and ICC premises provide barrier-free movement for persons with disabilities and low-mobility groups, as well as barrier-free access to and use of sanitation and hygiene facilities or their reasonable adaptation	Under implementation
17.	Increase expenditures on the maintenance of social protection institutions to ensure proper living conditions for wards/inmates and decent remuneration for staff	Under implementation
To local self-government bodies:		
18.	To take urgent measures to fill vacant positions of social work specialists in the relevant institutions, establishments that carry out social work, provide social services to vulnerable groups of the population of the region and to fill vacant positions in the services for children of the region, where they are not filled, in accordance with Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" of 24.01.1995 No. 20/95-BP	Under implementation

19.	To take measures to control the maintenance of documentation in children's services, in accordance with the requirements of current legislation	Under implementation
20.	Ensure that the information required by the Law of Ukraine "On Access to Public Information" and the Law of Ukraine "On Citizens' Appeals" is published on official websites	In progress
21.	Provide funds for major repairs of shelters in healthcare, education and social protection institutions	Under implementation
The Service for Children of Rivne Regional State Administration :		
22.	Together with territorial communities, take urgent measures to fill vacant positions in the regional children's services where they are not filled in accordance with Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" of 24.01.1995 No. 20/95-BP	Under implementation
23.	To take measures (education, training) to improve the skills of employees of the services	Under implementation
State authorities, enterprises, institutions and organisations:		
24.	Adapt websites and other information resources for use by people with visual and hearing impairments	In progress
25.	Allocate and properly equip parking spaces for persons with disabilities or persons transporting them near subordinate facilities	In progress
26.	Ensure that contrasting markings are applied to stairs, ramps, transparent door leaves, and tactile information elements	In the process of implementation
27.	To place information on the information stands about the Ukrainian Parliament Commissioner for Human Rights, telephone numbers of hotlines for free legal aid, psychological support, and executive authorities	Under implementation
SUMY REGION		

Sumy regional military administration:		
28.	To bring temporary accommodation facilities in Sumy region into line with the minimum standards for the functioning of temporary accommodation facilities, as stipulated by the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023	In the process of implementation
29.	Provide additional funding to compensate the balance holders of the ICC for the costs of housing and communal services	Not implemented
30.	To equip institutional care facilities with shelters	Completed
Local authorities of Sumy region:		
31.	Publish on the websites of the territorial communities of the region the information provided for by the laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals" at	Done
32.	To bring the number of employees of the services for children in the territorial communities of Sumy region in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	Done
Services for children of territorial communities and local administrations:		
33.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering them in housing	Achieved.
Healthcare institutions of Sumy region:		
34.	Ensure a sufficient level of funding for nutrition for children in children's departments, taking into account the physical development of children and the diversity of the diet in healthcare facilities	Completed

To other state authorities:		
35.	To keep the content of official websites and social media pages up to date, including contact information, working hours and reception of citizens	Done
TERNOPIL REGION		
Ternopil regional military administration and local self-government bodies:		
36.	Ensure that healthcare, education, social protection and ICC premises provide barrier-free movement for persons with disabilities and low-mobility groups, as well as barrier-free access to and use of sanitation and hygiene facilities or their reasonable adaptation	Under implementation
37.	Ensure publication on its own websites of the information required by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Under implementation
38.	Taking into account the security component, prevent a reduction in the number of ICCs used as temporary shelters for internally displaced persons	Completed
39.	Take measures to increase the social housing stock	Under implementation
40.	To establish the work of social protection bodies in the region, as well as medical institutions to provide services to veterans for their rehabilitation and reintegration	In progress
Ternopil Regional Council:		
41.	Ensure that funding is allocated to the Koropets Regional Boarding Lyceum with enhanced military and physical training for the arrangement of bedrooms, showers and sanitary rooms of the boarding house (dormitories) in accordance with the requirements of the	In the process of implementation

	Sanitary Regulations for General Secondary Education Institutions approved by the Order of the Ministry of Health of Ukraine No. 2205 "On Approval of the Sanitary Regulations for General Secondary Education Institutions" of 25.09.2020	
KHARKIV REGION		
Kharkiv regional military administration:		
42.	To bring temporary accommodation facilities in the Kharkiv region in line with the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930	In progress
43.	To equip and ensure the functioning of the veterans' space in accordance with the order of the Prime Minister of Ukraine of 28.08.2024 No. 27565/1/1-24	In progress
44.	Ensure that servicemen, veterans and their families, as well as the families of the deceased, are informed about social support measures and relevant programmes and projects implemented in the region, including those envisaged by the comprehensive Programme of Support for Defenders of Ukraine and their Families in Kharkiv Region for 2024-2028	Completed
45.	Ensure the arrangement and completion of shelters in the region for the civilian population, in particular on the territory of healthcare facilities, and exercise constant control over the free access of citizens to them and their readiness for use	Completed
46.	Continue developing and implementing distance education methods in the educational process, in particular for children with special educational needs	Done
To local self-government bodies:		
47.	To publish on the websites of the territorial communities of the region the	Under implementation

	information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	
48.	To match the number of employees of services for children in the territorial communities of Kharkiv region with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"	Under implementation
49.	Ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals, taking into account the conditions of martial law (personal reception via video conference, in safe spaces, etc.)	In progress
50.	Ensure that servicemen, veterans and members of their families, as well as the families of the deceased, are informed about social support measures and relevant programmes and projects implemented in the territorial communities of the region and in Kharkiv	Completed
51.	Ensure the arrangement and refurbishment of shelters in the region for the civilian population, including on the territory of healthcare facilities, and monitor their free access and readiness for use	In progress
Services for children of territorial communities, regional/district/city/township/village military administrations:		
52.	Ensure the realisation of property rights of orphans and children deprived of parental care through the registration of apartments	Under implementation
53.	Ensure protection and prevent the dissemination of confidential information (personal data of children) registered with the authorities	Under implementation
Healthcare institutions of Kharkiv region:		
54.	Ensure funding for nutrition for children, taking into account the individual needs of each child and to ensure the right of the child to a	In progress

	standard of living sufficient for physical, intellectual and moral development, including adequate nutrition	
To public authorities:		
55.	To allocate and properly equip parking spaces for persons with disabilities or persons transporting them near subordinate facilities	Under implementation
56.	Ensure that contrasting markings are applied to stairs, ramps, transparent door leaves, and tactile information elements are placed	In the process of implementation
57.	Adapt websites and other information resources for use by persons with visual, musculoskeletal, speech and intellectual disabilities, as well as with various combinations of disabilities	In progress
58.	Remove architectural barriers that impede the movement of people with reduced mobility in buildings (high door thresholds, access to lifts, unsuitable sanitary facilities, etc.)	In progress
59.	Maintain readiness for use and ensure accessibility of shelters.	In progress
KHERSON REGION		
Kherson regional military administration:		
60.	To bring temporary accommodation facilities in Kherson region into compliance with the minimum standards for the functioning of temporary accommodation facilities provided for by the Resolution of the Cabinet of Ministers of Ukraine No. 930 of 01.09.2023	In progress
Local self-government bodies of Kherson region:		
61.	To publish on the websites of the territorial communities of the region the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Under implementation

62.	Ensure personal receptions of citizens, as well as participation of citizens in the consideration of appeals, taking into account the conditions of martial law (personal reception via video conference, in safe spaces, etc.)	Completed
63.	Ensure that servicemen and members of their families, veterans, their families and families of the deceased are informed at about social support measures and relevant programmes and projects implemented in the territorial communities of the region and in Kherson	Completed
64.	To address the issue of the lack of or inadequate arrangement of parking spaces for persons with disabilities or persons transporting them near healthcare facilities	Completed
Healthcare institutions of Kherson region:		
65.	Ensure the arrangement and accessibility of shelters for patients and staff	Completed
To other state authorities and local self-government bodies:		
66.	Ensure the arrangement and accessibility of shelters	Completed
67.	Remove architectural barriers that impede the movement of people with limited mobility in healthcare buildings (high door thresholds, access to elevators, unsuitable sanitary facilities, ensure contrasting markings on stairs, ramps, transparent door leaves, placement of tactile information elements	Completed
68.	Adapt websites and other information resources for use by persons with visual, musculoskeletal, speech and intellectual disabilities, as well as with various combinations of disabilities	In the process of implementation
KHMELNYTSKYI REGION		
Khmelnyskyi Regional State Administration - Khmelnyskyi Regional Military Administration:		

69.	Ensure proper control over the organisation of medical, rehabilitation, educational and social services in residential social care institutions and institutions for institutional care and upbringing of children; bring the conditions of stay/residence and the state of equipment of civil protection facilities in them in line with the requirements established by the legislation of Ukraine	Completed
70.	Together with local self-government bodies, international and national non-governmental organisations (upon agreement), within their competence, ensure the improvement of living conditions in places of temporary residence of internally displaced persons. Ensure that the living conditions in all TACs included in the official List of places of temporary residence of internally displaced persons in Khmelnytskyi region meet the minimum requirements of the Procedure for the functioning of TACs approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930.	In progress
71.	To take measures to attract compensation for consumed utilities in accordance with the Resolution of the Cabinet of Ministers of Ukraine of 11 March 2022 No. 261 "On Approval of the Procedure and Conditions for Providing Compensation for Consumed Utilities during the Accommodation of Internally Displaced Persons in Buildings (Premises) of State, Communal and Private Property during the Period of Martial Law"	Implemented
72.	Ensure control over the strict implementation by the Service for Children of the Khmelnytskyi Regional Military Administration of measures to coordinate the activities of the services for children of the territorial communities of the region, in particular, the acquisition of the status of an orphan or a child deprived of parental care, as well as registration of children who may be adopted; formation and compliance of personal files of orphans and children deprived of parental care and children in difficult life	Completed

	circumstances with the requirements of the current legislation	
73.	Ensure that healthcare, education, social protection and ICC premises provide barrier-free movement for persons with disabilities and low-mobility groups, as well as barrier-free access to and use of sanitation and hygiene facilities or their reasonable adaptation	Completed
To local self-government bodies:		
74.	Ensure that information provided for by the Law of Ukraine "On Access to Public Information" and schedules of personal reception of citizens are published on official websites	Completed
75.	Ensure barrier-free and accessible premises in local community institutions for people with disabilities and low-mobility groups	Done
76.	Bring the staffing level of local community children's services in line with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Article 12 of the Law of Ukraine "On Ensuring Organisational and Legal Conditions for Social Protection of Orphans and Children Deprived of Parental Care" and fill vacant positions	Implemented
77.	Take effective measures to create family-based forms of education in each community of the region to ensure the right of every child to be brought up in a family	Done
78.	Implement measures aimed at improving living conditions in temporary accommodation facilities operating on the territory of the community in accordance with the minimum requirements of the ICC Functioning Procedure approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930	Completed
79.	Ensure the formation and accounting of the housing fund intended for temporary residence, the introduction of registration of IDPs in need of housing for temporary	Completed

	residence, as well as their registration as those in need of housing for temporary residence	
Khmelnyskyi regional CCC and SP:		
80.	Ensure acceptance, registration and timely consideration of citizens' appeals/inquiries in all structural subdivisions of the CCC and JCC of the region	Done
81.	Conduct explanatory work on preventing human rights violations during mobilisation activities	Done
CHERKASY REGION		
Cherkasy regional military administration:		
82.	To arrange/refurbish shelters for civilians in the region and to monitor the free access of citizens to them on a regular basis	In progress
83.	Ensure accessibility to municipal and state-owned institutions for persons with disabilities	In progress
Local self-government bodies:		
84.	Ensure the publication of public information on the official websites of the territorial communities of Cherkasy region and strengthen control over compliance with the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"	Completed
85.	to ensure personal receptions of citizens, as well as participation of citizens in consideration of appeals, taking into account the conditions of martial law (personal receptions via video conferencing, in safe spaces, etc.)	Completed
National police bodies in Cherkasy region:		
86.	Provide advanced training in the field of legislation on citizens' appeals, access to public information and access to personal data for	In progress

	employees who consider appeals/complaints or requests for access to public information	
Cherkasy regional TCC and JV (and structural units in the region):		
87.	Provide advanced training in the field of legislation on citizens' appeals, access to public information and access to personal data for employees who consider appeals/complaints or requests for access to public information	Under implementation
CHERNIVTSI REGION		
Western Interregional Centre for Free Legal Aid Provision:		
88.	To develop a mechanism to ensure the work of free legal aid lawyers in remote mountainous settlements	In progress
Chernivtsi Regional State Administration (regional military administration):		
89.	To make an inventory of the ICCs for compliance with the minimum requirements of living conditions defined by the Resolution of the Cabinet of Ministers of Ukraine of 1 September 2023 No. 930 "Some issues of functioning of temporary accommodation places for internally displaced persons" and ensure implementation of the recommendations provided	Completed
90.	Ensure the provision of hard and soft equipment (wardrobes, bedside tables, chairs, tables, single bunk beds, mattresses, blankets, bed linen, etc.) to social and educational institutions at the regional level with round-the-clock care for children	Completed
Chernivtsi regional state administration (regional military administration), village, town and city councils:		
91.	Strengthen coordination of actors involved in preventing and responding to	Completed

	domestic violence through regular interagency meetings and information exchange	
92.	Increase public awareness of the mechanisms of protection against domestic violence, in particular through information campaigns, trainings and access to hotlines	Done
93.	Conduct an audit to ensure that the management of the Municipal Utility Company complies with the procedure for compensation for utilities for IDPs and oblige them to submit timely applications for compensation in accordance with the law	Implemented
94.	Provide free transportation for privileged categories of residents in Chernivtsi	Not implemented
95.	take measures to ensure accessibility to buildings and structures in accordance with DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main Provisions" in healthcare facilities, ICC	In the process of implementation
Village, settlement and city councils:		
96.	Bring the staffing levels of children's services in village, settlement and city councils of the region in line with the current legislation and fill the existing vacancies	In progress
97.	To organise the work of Commissions for the Protection of Children's Rights and interdisciplinary teams	In progress
98.	Provide for the position of a social work specialist to provide social services to children and families of socially vulnerable categories of the community	In progress
99.	Ensure control over the length of stay of children in institutional care and education facilities	Implemented
00.	To fill the websites in accordance with the requirements of the legislation on access to public information and consideration of citizens' appeals and to ensure regular updating of official resources to properly inform the population and introduce internal monitoring of the quality of information provision	Completed
CHERNIHIV REGION		

Chernihiv Regional State (Military) Administration:		
01.	In residential social care institutions and institutional care and education institutions for children, to ensure control over the organisation of quality nutrition, proper social and medical care for wards and children, compliance with sanitary, hygienic, anti-epidemic (preventive) and fire protection measures; compliance with the permissible living space for wards and children in living rooms in these institutions; provision of long-term storage food supplies and sufficient drinking water in shelters; establish	Implemented
02.	Ensure control over the proper implementation by the Service for Children of the Chernihiv Regional State Administration of measures to coordinate the activities of the services for children of the territorial communities of the region, in particular, the stay of children placed in family-based care; maintaining personal files of orphans and children deprived of parental care; drawing up and implementing individual plans for social protection of children in difficult life circumstances, orphans, children deprived of parental care; and	Done
03.	Ensure that providers of social services with round-the-clock accommodation (stay) obtain a licence to carry out economic activity in medical practice	Done
04.	Together with local self-government bodies, organise outreach medical and healthcare activities for orphans and children deprived of parental care who are in institutional care and education facilities;	In progress
05.	To exercise constant control over the distribution of humanitarian aid to social care institutions and institutional care and education facilities for children and to stop the misuse of such aid;	In progress
06.	To establish a working group with the participation of representatives of regulatory	Under implementation

	and law enforcement agencies to identify cases of forced detention of people in non-governmental boarding houses for the elderly and persons with disabilities and cases of slave labour of wards in residential social care institutions.	
07.	To intensify the work of the observation commissions established by Chernihiv Regional Military District Administration and district state administrations to monitor the conditions of detention and observance of the rights of prisoners and convicts held in penitentiary institutions of the region	Done
To local self-government bodies:		
08.	Ensure publication of schedules of personal reception of citizens, means of communication and relevant information on the activities of children's services, as provided for by the Law of Ukraine "On Access to Public Information" on official web resources of local self-government bodies	Under implementation
09.	Ensure barrier-free and accessible premises in local community institutions for people with disabilities and low-mobility groups	In progress
10.	Implement measures aimed at improving living conditions in temporary accommodation facilities operating on the territory of the community, in accordance with the minimum requirements of the ICC Functioning Procedure approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930	Completed
11.	To bring the number of employees of the services for children in the territorial communities of Chernihiv Oblast in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Article 12 of the Law of Ukraine "On Ensuring Organisational and Legal Conditions for Social	Completed

	Protection of Orphans and Children Deprived of Parental Care"	
Services for children of territorial communities, regional/district/city/municipal/village military administrations:		
12.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering them in the housing register	In the process of implementation
13.	Increase attention to the issue of protection and prevention of dissemination of personal data of children registered with the state	Under implementation
14.	To develop a network of foster families for temporary care and upbringing and rehabilitation of children in families	Completed

Appendix 2

Summary of the Commissioner's Recommendations Provided in the Annual Report for 2025

To the Verkhovna Rada of Ukraine:	
1.	To support the draft Law of Ukraine No. 14095 of 01.10.2025 "On Amendments to the Criminal Procedure Code of Ukraine and Other Laws of Ukraine on Optimisation of the Processes of Search for Missing Persons and Identification of Unidentified Bodies (Remains) during Martial Law"
2.	To speed up the consideration of the draft Law of Ukraine reg. No. 13136 of 26 May 2025 "On Amendments to the Law of Ukraine 'On Compensation for Damage and Destruction of Certain Categories of Real Estate Objects as a Result of Hostilities, Terrorist Acts, Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine, and the State Register of Property Damaged and Destroyed as a Result of Hostilities, Terrorist Acts, Sabotage Caused by the Armed Aggression of the Russian Federation against Ukraine' and some other laws of Ukraine to improve the mechanism for providing compensation and accounting for real estate
3.	To accelerate the consideration and adoption in the second reading of the draft Law of Ukraine "On Amendments to the Law of Ukraine "On Ensuring the Rights and Freedoms of Internally Displaced Persons" and other laws of Ukraine" (Reg. No. 12301)
4.	to speed up the consideration and adoption in the second reading of the draft law on amendments to the Law of Ukraine "On State Registration of Real Rights to Real Estate and Their Encumbrances" to ensure the mechanism of state registration of ownership of real estate in the absence of access to the materials of the technical inventory bureau (reg. No. 11440)
5.	To speed up the consideration of the draft law "On the Ukrainian Parliament Commissioner for Human Rights" (Reg. No. 13181)
6.	Amend the Electoral Code of Ukraine to simplify the procedures for organising and opening polling stations abroad
7.	Ensure consideration and adoption of the draft Law of Ukraine "On Amendments to the Code of Ukraine on Administrative Offences

	and the Criminal Code of Ukraine on Combating Discrimination" (reg. No. 13597 of 04.08.2025)
8.	Ensure consideration and adoption of the Draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine to Bring Them in Line with the Requirements of Articles 8 and 14 of the Convention for the Protection of Human Rights and Fundamental Freedoms (European Convention on Human Rights) and Council Regulation (EU) 2016/1104 on the implementation of enhanced cooperation in the field of jurisdiction, applicable law and the recognition and enforcement of decisions in cases of property effects of registered partnerships" (Reg. No. 12252 of 27.11.2024)
9.	Ensure consideration and adoption of the Draft Law of Ukraine "On Amendments to the Disciplinary Statute of the National Police of Ukraine on the Settlement of the Issue of Prevention of Sex Discrimination and Sexual Harassment in the Workplace" (reg. No. 14036 of 12.09.2025)
10.	Ensure consideration and adoption of the draft Law "On Amendments to the Law of Ukraine "On Advertising" in connection with the adoption of the Law of Ukraine "On Administrative Procedure" (reg. No. 14346 of 30.12.2025)
11.	To consider the draft Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on Fare Benefits and Some Other Benefits" (Reg. No. 5651-2 of 25.06.2021)
12.	to consider the draft Law of Ukraine "On Amendments to the Tax Code of Ukraine and Certain Other Legislative Acts of Ukraine on Regulation of the Turnover of Virtual Assets in Ukraine" (Reg. No. 10225-d of 24.04.2025)
13.	when developing and adopting the law on the State Budget of Ukraine for the respective year, not to include provisions on the amendment or suspension of other laws that guarantee the right to social protection
of the Verkhovna Rada Committee on Humanitarian and Information Policy:	
14.	To ensure the activities of the working group on the development of a draft law on Ukrainian sign language
of the Cabinet of Ministers of Ukraine:	
15.	Ensure that draft amendments to Article 10-1 of the Law of Ukraine "On Social and Legal Protection of Servicemen and Members of Their Families" are developed and submitted to the Verkhovna Rada of Ukraine in accordance with the established procedure, providing for the possibility of retaining financial and material support for servicemen

	who, by the decision of the Military Qualification Commission, are in healthcare facilities and on leave for treatment due to illness or on leave for treatment after being wounded (contusion, trauma or injury) for more than 12 consecutive months
16.	Ensure that draft amendments to Article 26 of the Law of Ukraine "On Military Duty and Military Service" regarding the grounds for dismissal from military service in case of illegal mobilisation are developed and submitted to the Verkhovna Rada of Ukraine in accordance with the established procedure
17.	In order to implement the operational plan of measures for the implementation of the Veteran Policy Strategy for the period up to 2030, ensure the development of the current legal framework regulating the implementation of veteran policy in the state in order to modernise and improve it
18.	to ensure the development and submission to the Verkhovna Rada of Ukraine of the draft Law of Ukraine "On Amendments to the Law of Ukraine "On Compulsory State Social Insurance" to strengthen social protection of certain categories of insured persons" in accordance with the established procedure
19.	To ensure prompt response to cases of administrative expulsion from the territory of the Russian Federation of Ukrainian citizens who do not have identity documents, approve an interagency algorithm for the return of Ukrainian citizens through the territory of third countries bordering the Russian Federation, with clear procedures for identification, temporary documentation, consular and humanitarian support, as well as coordination with international partners
20.	Develop and adopt a legal act regulating the mechanism for the return of civilians to the territory controlled by the Government of Ukraine from the temporarily occupied territory of Ukraine and the territory of the Russian Federation, with a clear division of functions of central executive authorities
21.	To develop and submit to the Verkhovna Rada of Ukraine amendments to the Law of Ukraine "On Social and Legal Protection of Persons Deprived of Personal Liberty as a Result of Armed Aggression against Ukraine and Members of Their Families" to introduce social guarantees for family members of civilians deprived of personal liberty as a result of armed aggression against Ukraine, corresponding in scope to the guarantees established for family members of servicemen who were killed or held in captivity
22.	To develop a procedure for cooperation between the Ministry of Social Policy, Family and Unity of Ukraine and the Ministry of Health of Ukraine in terms of exchanging information on the needs of civilians who have been deprived of their personal liberty as a result of armed aggression against Ukraine and their family members during their relocation and reintegration in communities

23.	Amend the Regulation on the Commission for Establishing the Fact of Deprivation of Personal Liberty as a Result of Armed Aggression against Ukraine, approved by the CMU Resolution No. 1281 of 15.11.2022, and relevant legislation to provide for - expanding the Commission's access to state registers and information and communication systems; - ensuring digital transformation of the processes of submitting, reviewing, tracking applications and setting clear deadlines for reviewing applications; - ensuring the right of applicants who apply to the Commission to establish the fact of deprivation of personal liberty as a result of armed aggression against Ukraine to get acquainted with the case file (except for restricted information), receive motivated decisions and comprehensive information on the procedure and ways to appeal them
24.	In order to ensure the proper exercise of the rights of persons involved in repulsing and deterring the armed aggression of the Russian Federation and/or other states against Ukraine, to develop and submit for registration a draft regulatory act on the procedure for collecting, storing and using dental information for this category of persons in accordance with the established procedure
25.	to align with current challenges the regulatory framework governing the procedure for interagency cooperation in dealing with unidentified bodies (remains) of deceased persons received during repatriation measures
26.	To amend the Order of the Ministry of Internal Affairs of Ukraine, the Ministry of Health of Ukraine, the Office of the Prosecutor General "On Approval of the Procedure for Interaction between the Bodies and Units of the National Police of Ukraine, Healthcare Institutions and Prosecutor's Offices of Ukraine in Establishing the Fact of Death of a Person during Martial Law on the Territory of Ukraine" of 09.03.2022 No. 177/450/46
27.	In order to preserve the staff and proper functioning of state specialised institutions of Ukraine, to consider the issue of renewal of part two of Article 18 of the Law of Ukraine "On Forensic Expertise"
28.	To develop and submit to the Verkhovna Rada of Ukraine a draft law on support for persons whose personal non-property rights have been damaged as a result of the armed aggression of the Russian Federation against Ukraine
29.	to develop and submit to the Verkhovna Rada of Ukraine a draft law on amendments to the Law of Ukraine "On the provision of public (electronic public) services for the declaration and registration of residence in Ukraine", which would provide for the introduction of a temporary procedure for confirming the registration or declaration of residence of Ukrainian citizens registered in the temporarily occupied

	territories where registers of territorial communities have not been created or are not functioning
30.	To determine the ministry responsible for the formation and implementation of state policy in the field of interaction with the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine and coordination of the work of central and local executive authorities on this issue
31.	To approve an action plan for organising the interaction of central and local executive authorities, as well as local self-government bodies with the Register of Damage Caused by the Aggression of the Russian Federation against Ukraine, and informing citizens about the possibility of submitting applications to the Register, which should include the identification of responsible executors, specific measures and deadlines for their implementation
32.	to develop draft amendments to the Law of Ukraine "On Alternative (Non-military) Service", providing for the possibility of involving a certain category of citizens during martial law to perform tasks related to the construction of fortifications, evacuation and care of the wounded, filling rear positions in military units, working at defence enterprises, etc.
33.	Ensure amendments/develop and adopt, if necessary, new by-laws and regulations to bring them in line with the Law of Ukraine "On Amendments to Certain Legislative Acts of Ukraine on the Settlement of Issues of Evacuation, Accommodation and Life Support of the Evacuated Population, Ensuring the Protection of Children in Settlements Located in the Territories of Active and Possible Military (Combat) Operations" in order to regulate issues of compulsory evacuation without the consent of the legal guardians
34.	introduce a state quality standard for personal protective equipment for children (bulletproof vests, helmets) used during evacuation measures by 2026
35.	Take measures to regulate the issue of providing personal protective equipment to children under the age of 4 during the organisation of measures for their further evacuation
36.	To develop a mechanism for informing the units participating in hostilities on the line of contact, the National Police of Ukraine and guardianship and care authorities about children found in the areas of active hostilities for their immediate evacuation
37.	to approve the draft Law of Ukraine "On Amendments to the Criminal Code of Ukraine, the Criminal Procedure Code of Ukraine and Other Legislative Acts on Child-Friendly Justice", developed to implement Measure 2 of the section "Ensuring the Protection of Children's Rights and Principles of Child-Friendly Justice" of Area 3.5 of the Rule of Law Roadmap, approved by the Cabinet of Ministers of Ukraine on 14 May 2025 No. 475-p

38.	Ensure control over the use by the relevant administrators of the subvention for the implementation of the public investment project for the arrangement of safe conditions (arrangement of shelters) in institutions providing general secondary education, including military (naval, military-sports) lyceums, lyceums with enhanced military and physical training, and in preschool education institutions, approved by the Resolution of the Cabinet of Ministers of Ukraine of 28 April 2023 No. 419 (as amended by the Resolution of the Cabinet of Ministers of Ukraine of 26 December 2025 No. 1793)
39.	Develop and approve a state targeted programme for the restoration and security of educational infrastructure, which will provide for a phased return to full-time education, taking into account the security situation, the level of mine risk and the technical condition of educational institutions
40.	Develop and implement standards for the educational process, as well as technical requirements for the premises of so-called "underground" educational institutions
41.	Ensure the development of a mechanism for allocating funds to executive authorities for the implementation of measures to return children who are citizens of Ukraine in accordance with the Procedure for the Return to Ukraine of Children Deprived of Parental Care who are Citizens of Ukraine, approved by the Cabinet of Ministers of Ukraine of 23.04.2003, No. 569
42.	Ensure the development and amendment of the Model Programme for the Prevention of Violence and Cruelty against Children and the Procedure for Responding to Cases of Violence and Cruelty against Children with other legal acts regulating the activities of actors in the field of child protection in order to harmonise the timeframes for responding to reports of violence and to clearly delineate the duties and responsibilities of actors
43.	Ensure the development and approval of minimum standards for the provision of individual clothing, items, materials and equipment for children placed in institutions of institutional care and education, as well as other institutions of around-the-clock stay, of different subordination and forms of ownership
44.	To develop and ensure amendments to the Code of Administrative Offences regarding the term for imposing an administrative penalty for offences under Article 173 ⁽⁴⁾ of the Code of Administrative Offences on bullying (harassment) of a participant in the educational process, in terms of increasing it to one year from the date of its commission, as well as defining administrative liability for violence and cruel treatment of children (which does not fall under bullying (harassment))
45.	Ensure coordination and cooperation of the Ministry of Social Policy, Family and Unity of Ukraine, the State Service of Ukraine for

	Children and the National Social Service of Ukraine with regional military administrations on the observance of the rights of children temporarily displaced (evacuated) outside Ukraine, including responding to violations (if any), conducting monitoring visits (urgent monitoring visits), assessing the needs of children and their return to the territory of Ukraine and placement in family-based care
46.	Ensure adequate funding for the organisation of elections abroad
47.	Ensure effective interagency coordination between ministries and other central executive authorities on the organisation and conduct of elections and voting of Ukrainian citizens abroad
48.	To adopt by-laws necessary for the exercise of voting rights of citizens abroad
49.	To include the Secretariat of the Ukrainian Parliament Commissioner for Human Rights in international technical assistance programmes and projects aimed at supporting European integration processes and implementation of European human rights standards within the framework of the negotiation process on Ukraine's accession to the EU
50.	to ensure the implementation of the recommendations of the Shadow Report to Chapters 23 "Justice and Fundamental Rights" and 24 "Justice, Freedom and Security" of the European Commission's Report on Ukraine's Progress in the framework of the EU Enlargement Package 2024, prepared by the Agency for Legislative Initiatives, in terms of recommendations related to enhancing the institutional independence of the Ombudsperson's activities
51.	ensure that the Ombudsperson and representatives of the Ombudsperson's Office as a national human rights institution are included in the delegation of the Government of Ukraine to the session of the UN Commission on the Status of Women (annually).
52.	To develop a draft Law of Ukraine "On Amendments to Article 149 (Trafficking in Human Beings) of the Criminal Code of Ukraine" in order to criminalise acts related to advertising of victims of human trafficking on the Internet and to supplement the list of types of exploitation in the Note to this article with the use of information and communication technologies
53.	To approve the draft State Social Programme for Preventing and Combating Domestic and Gender-Based Violence for the period up to 2030
54.	to develop a draft Law of Ukraine "On Amendments to the Law of Ukraine 'On Combating Trafficking in Human Beings' to improve certain provisions regulating issues in the field of combating trafficking in human beings", which, in particular, provides for the empowerment of local governments to take measures in the field of combating trafficking in human beings

55.	To develop and approve a procedure for interaction between bodies, institutions and organisations in responding to cases of sexual violence related to the armed aggression of the Russian Federation against Ukraine, to ensure that victims receive appropriate assistance, protection and their rights to receive immediate financial compensation are respected
56.	Ensure the procedure for consideration and adoption of a decision on the legal status of the representative body of the Crimean Tatar people
57.	to develop and approve a state programme to support freedom of speech under martial law, which will include SLAPP prevention as a separate area
58.	to develop and adopt a resolution defining the functioning of the mobile application "Diia" with mandatory support for alternative identification of persons who have refused to be registered with the RNOCPD
59.	to develop and submit to the Verkhovna Rada of Ukraine a draft law on amendments to the Law of Ukraine "On Citizenship of Ukraine" in terms of regulating the issue of acquiring Ukrainian citizenship and declarative renunciation of foreign citizenship by foreigners who are serving/have served in the Armed Forces of Ukraine or other military formations, regardless of the country of origin and the fact of concluding a contract, provided that there is no criminal conviction
60.	Ensure that gender audits are conducted in accordance with the Operational Action Plan for the implementation of the State Strategy for Ensuring Equal Rights and Opportunities for Women and Men until 2030 in 2025-2027
61.	to develop and approve the National Action Plan for the implementation of the UN Convention on the Rights of Persons with Disabilities for the period up to 2030, taking into account the recommendations of the UN Committee on the Rights of Persons with Disabilities, in particular, to establish an independent mechanism for monitoring the implementation of the Convention in accordance with Article 33(2) of the Convention and to make the Ukrainian Parliament Commissioner for Human Rights a part of such a mechanism
62.	develop and submit to the Verkhovna Rada of Ukraine a draft Law of Ukraine "On the Basic Principles of State Policy on Creating a Barrier-Free Space in Ukraine"
63.	to develop and submit to the Verkhovna Rada of Ukraine a draft Law on Amendments to the Law of Ukraine "On Amendments to the Law of Ukraine "On Free Legal Aid" to expand the list of persons entitled to free secondary legal aid" of 05.12.2024 No. 4133-IX to include victims of criminal offences motivated by intolerance on the grounds of sexual orientation and gender identity in the list of persons entitled to free secondary legal aid, as well as to exclude the provision

	on the entry into force of the law one year after the date of termination or cancellation of martial law in Ukraine
64.	Ensure equal access to state programmes, regardless of the method of tax registration of the applicant
65.	Consider the feasibility of integrating the system of emergency assistance to the population through a single telephone number 112 with the Diia application to supplement the service of rapidly calling the police in case of domestic and/or gender-based violence
66.	To develop and submit to the Verkhovna Rada of Ukraine a draft law on amendments to the Law of Ukraine "On Compulsory State Pension Insurance" in order to regulate the issue of withholding from citizens the amounts of pensions paid for the past period in case the expert commissions for assessing the daily functioning of a person's previously established disability groups cancel them
67.	To develop and submit to the Verkhovna Rada of Ukraine a draft law on amendments to the Law of Ukraine "On the Status and Social Protection of Citizens Affected by the Chornobyl Disaster" of 28 February 1991 No. 796-XI in order to regulate the issues of pension supplementation for non-working pensioners living in the territory of radioactive contamination as a result of the Chornobyl disaster, as well as to preserve social guarantees in case the territory where they live is excluded from the list of areas of radioactive contamination after dosimetric certification.
68.	develop and submit to the Verkhovna Rada of Ukraine a draft law on amendments to the Law of Ukraine "On Environmental Impact Assessment" to strengthen control over business entities in terms of post-project monitoring
69.	to develop and submit to the Verkhovna Rada of Ukraine a draft law amending the Law of Ukraine "On Waste Management" to delineate the powers of state authorities and local self-government bodies in the collection, transportation and/or treatment of waste whose owner is not identified
70.	develop and submit to the Verkhovna Rada of Ukraine a draft law amending the Land Code of Ukraine to empower executive bodies of local self-government bodies to resolve land disputes and define the procedure for their resolution
71.	to develop and adopt resolutions/orders to empower central executive authorities to approve, amend and cancel national classifiers in their areas of competence
72.	To develop and adopt resolutions/orders to provide persons affected by the Chornobyl disaster with medicines, in particular insulin, free of charge
73.	to develop and adopt resolutions/orders on the approval of qualification requirements for research and development, research

	organisations that develop research and development (research) documentation in the field of cultural heritage protection
74.	to develop and adopt resolutions/orders on the amount and procedure for charging additional payments, providing financial assistance to professional artists of concert organisations of state and municipal ownership, circuses and circus organisations
75.	To develop and adopt resolutions/orders on a programme document aimed at observing the rights of older people to work on an equal footing with other citizens
76.	To develop and adopt resolutions/orders on the mechanism for refunding overpayments to gas consumers and establishing the responsibility of suppliers for late refunds
77.	develop and adopt resolutions/orders to regulate the activities of bus stations, setting requirements for their operation, safety, accessibility and quality of service, with the designation of an authorised body to monitor the observance of the rights of consumers of bus station services
78.	To amend the Resolution of the Cabinet of Ministers of Ukraine of 29 December 2009 No. 1417 "Some issues of activity of territorial centres of social services (provision of social services)" regarding the conditions and procedure for the provision of social services that contradict the Law of Ukraine "On Social Services"
79.	Amend the Resolution of the Cabinet of Ministers of Ukraine of 15 November 2024 No. 1338 "Some Issues of Implementation of the Assessment of a Person's Daily Functioning" in terms of determining the list of documents confirming that a person belongs to the category of those who cannot be referred for an assessment of a person's daily functioning and the maximum timeframe for reviewing decisions of expert teams on assessing a person's daily functioning based on the results of complaints
80.	Amend the Resolution of the Cabinet of Ministers of Ukraine of 26 December 2025 No. 1802 "On Amendments to the Licensing Conditions for the Conduct of Economic Activities for the Production of Medicines, Wholesale and Retail Trade in Medicines, Import of Medicines (Except for Active Pharmaceutical Ingredients)" in terms of expanding the list of medicines that can be sold in pharmacies located in healthcare facilities
81.	Amend the Resolution of the Cabinet of Ministers of Ukraine No. 298 of 17 March 2011 "On Approval of the Procedure for the Use of Funds Provided for in the State Budget to Ensure the Implementation of Medical Measures of Certain State Programmes and Comprehensive Programmes" in terms of setting deadlines for submitting applications to the Ministry of Health and the State Enterprise "Medical Procurement of Ukraine" for the procurement of medicines and medical devices

82.	to amend the Resolution of the Cabinet of Ministers of Ukraine of 5 June 2019 No. 483 "On Approval of the Regulation on the Imposition of Special Obligations on Electricity Market Participants to Ensure Public Interest in the Functioning of the Electricity Market" to confirm the fact of the absence of gas supply to apartment buildings and the absence or non-functioning of district heating systems or autonomous heating systems that use any type of energy carriers other than
83.	Ensure the adoption of regulations necessary for the implementation of the Law of Ukraine "On Waste Management"
The Ministry of Communities and Territories Development of Ukraine:	
84.	Ensure systematic information support and counselling for civilians deprived of their personal liberty as a result of the armed aggression against Ukraine and their family members, including through the preparation of unified information materials and explanations
85.	Develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to introduce a mechanism for accounting for real property over which control or access to the TOT has been lost, providing for the possibility of submitting information about such property and the damage or destruction caused to it through the Diia portal
86.	develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to ensure the possibility of submitting information reports on movable property and non-residential property damaged or destroyed as a result of armed aggression through the Diia portal
87.	To develop and submit to the Cabinet of Ministers of Ukraine resolutions to amend Resolution of the Cabinet of Ministers of Ukraine of 7 July 2025 No. 815, which would provide for: 1) revision of the criteria for recognising an object as destroyed based on the results of a remote survey; 2) a mechanism for making decisions on apartment buildings as a single object based on the first application submitted; 3) an exhaustive list of grounds for refusing to conduct a remote inspection and ensure the mandatory provision of motivated written decisions; 4) the procedure for appealing against decisions, actions or inaction of the commissions; 5) determining the criteria of economic inexpediency of restoration of the real estate object for making a decision on its classification as destroyed
88.	To develop and submit to the Cabinet of Ministers of Ukraine a regulatory act that will eliminate legislative gaps regarding compensation for damaged common property of apartment buildings, housing of members of housing cooperatives without registered

	ownership, as well as for unfinished construction projects, compensation for repairs carried out at their own expense, despite the existence of legal grounds
89.	Ensure practical implementation of the mechanism of compensation for self-initiated repairs of damaged housing and review the maximum amounts of such compensation, taking into account the actual costs of the affected persons
90.	to develop and submit to the Cabinet of Ministers of Ukraine a draft legal act on the introduction of systemic mechanisms for compensation or provision of housing for persons whose housing was damaged or destroyed as a result of armed aggression or whose right to use it is restricted, in order to create conditions for the improvement of the lives of such persons in the government-controlled territory of Ukraine and to prevent their forced return to the temporarily occupied territories
91.	Strengthen the integration of places of compact residence of the Roma national minority (community) into the spatial planning system by taking into account the issues of overcoming spatial segregation in the development and implementation of state policy in the field of urban planning, as well as preparing methodological recommendations for local governments on the inclusion of such territories in master plans and urban planning documentation
92.	Bring Order No. 424 of 19.05.2023 "On Conducting Unscheduled Measures of State Architectural and Construction Control (Supervision) for the Period of Martial Law" in line with the Law of Ukraine "On the Basic Principles of State Supervision (Control) in the Field of Economic Activity"
93.	To amend the Procedure for the maintenance of cemeteries and other burial sites, approved by the Order of the State Housing and Communal Services of Ukraine of 19.11.2003 No. 193, to improve the mechanisms of control by local authorities and cemetery balance holders, with responsibility for violations of landscaping, installation of structures and improper maintenance of cemeteries
94.	To amend CMU Resolution 1281 of 15 November 2022 to ensure the possibility of receiving state annual assistance to the account of trustees for citizens from the temporarily occupied territories
To the Ministry of Defence of Ukraine:	
95.	Ensure that collection points are brought into full compliance with the requirements of CMU Resolution No. 560 and stop the practice of unlawful restriction of citizens' freedom on the territory of the TOT and JFO
96.	Together with the General Staff of the Armed Forces of Ukraine, the Command of the Armed Forces of Ukraine, within their competence,

	ensure that commanders of military units and military command and control bodies comply with the requirements of departmental regulations regulating the discharge of servicemen from military service for family and health reasons
97.	To determine the maximum period of stay of servicemen in combat areas and ensure rotation of units
98.	Consider amending the MoD Order of 21.01.2023 No. 45 "On Approval of the Procedure and Conditions for the Appointment and Payment of a One-time Financial Allowance in the Event of the Death of Servicemen of the Armed Forces of Ukraine during the Period of Martial Law" to establish an appropriate period within which the command of a military unit must provide the necessary documents at the request of the CMC and JIC
99.	Ensure quarterly inspections of compliance with the deadlines set by the HQCs when approving decisions of the extraordinary HQCs and complaints against such decisions. If necessary, consider increasing the number and expanding the staff of the SLC
100.	To develop a regulatory act to prohibit the use of face disguises by alert groups consisting of TCC and JFO employees, removal of insignia from military uniforms and other actions aimed at violating the rights of citizens
101.	to provide the TCC and JRB with technical devices with photo and video recording functions and devices with the function of scanning information of military registration documents in electronic form to avoid violations of the rights of citizens and their unreasonable delivery to the TCC and JRB
102.	Ensure that TCCs and JCCs are staffed with employees who are properly trained to communicate with civilians. Organise psychological testing and training for them on a regular basis
103.	Develop and enact a regulatory act to streamline military registration and enter up-to-date information into the Unified State Register of Conscripts, Persons Liable for Military Service and Reservists regarding persons liable for military service and reservists in the reserve of the SSU and intelligence agencies
104.	Ensure that military units are allocated the necessary funds to timely finance the payments to family members of servicemen captured or taken hostage, as well as interned in neutral states or missing. Ensure effective control over the compliance of the command of military units with the requirements of the Procedure for the payment of financial support to the families of servicemen captured or hostages, as well as interned in neutral states or missing, approved by the Cabinet of Ministers of Ukraine on 30.11.2016 No. 884.
105.	Within its competence, take educational and organisational measures in the field of cybersecurity and cyber defence to prevent unauthorised access to personal data

106.	to eliminate the lack of living space in disciplinary battalions, brig and detention rooms for detained servicemen and create appropriate conditions for daily walks
107.	to introduce a proper procedure and regularity of medical examinations of persons held in disciplinary battalions, brig and detention rooms
To the Ministry of Veterans Affairs of Ukraine:	
108.	To approve joint orders of the Ministry of Veterans Affairs of Ukraine and the Ministry of Defence of Ukraine, the Ministry of Education and Science of Ukraine, the Ministry of Youth and Sports of Ukraine, the Ministry of Health of Ukraine, the Ministry of Internal Affairs of Ukraine, the Administration of the State Special Communications Service, the Security Service of Ukraine, the Foreign Intelligence Service of Ukraine and other agencies involved in the implementation of veterans' policy, which regulate certain procedures for interaction between specialists in support of veterans and demobilised persons and relevant support services and for
109.	To develop and approve methodological recommendations on the regulation and application of a unified approach to honouring the memory of fallen defenders of Ukraine
110.	to comprehensively study the issue of identifying ways to solve the problem of non-compliance with the norms of Ukrainian legislation on priority housing provision within two years from the date of registration of persons with disabilities as a result of war, including within the framework of the draft Veterans' Code
To the Ministry of Health of Ukraine:	
111.	Conduct a comprehensive inspection of the Centre for Assessment of Functional Status of a Person of the State Institution "Ukrainian State Research Institute of Medical and Social Problems of Disability" to ensure that the terms of consideration of documents on establishing disability and appealing against decisions of expert teams are met, with a special focus on cases of active military personnel and persons discharged from military service who have the status of combatants
112.	To develop and establish deadlines for consideration of documents in cases of disability determination, in particular for combatants and persons discharged from military service
113.	To develop and implement a priority procedure for assessing daily functioning for combatants, as well as a mechanism for continuous

	monitoring of the timeframe for consideration of cases by expert teams, with officials held personally liable for unreasonable delays
114.	Ensure effective mechanisms for informing applicants about the progress and timelines of their cases, as well as the possibility of prompt administrative appeal against the inactivity of the Centre for Assessment of Functional Status of a Person of the State Institution "Ukrainian State Research Institute of Medical and Social Problems of Disability"
115.	To create a working group to implement an integrated data management system (hereinafter - IDMS) for entering, storing, processing and using data based on the results of the study of unidentified bodies (remains) of persons who died as a result of armed aggression against Ukraine, and to develop amendments to the regulatory acts to ensure the functioning of the relevant module
116.	To establish a ban on the use of physical restraint (fixation) to children, in particular minors, by amending the Rules for the use of physical restraint and (or) isolation in the provision of psychiatric care to persons suffering from mental disorders and the forms of primary accounting documentation approved by the Order of the Ministry of Health of Ukraine No. 240 of 24.03.2016
117.	To approve clear and reasonable criteria for the provision of inpatient psychiatric care for children in order to stop unjustified inpatient treatment of children who can receive psychiatric care on an outpatient basis
118.	update the legal regulation of the use of restrictive measures in psychiatric institutions, in particular the Order of the Ministry of Health of Ukraine of 24.03.2016 No. 240, taking into account international standards, in order to bring it in line with the recommendations of the European Committee for the Prevention of Torture "Restraints in psychiatric institutions for adults" (CPT/Inf(2006)35-part)
119.	Take measures to ensure adequate staffing of psychiatric institutions: increase the number of psychiatrists, nurses, junior medical staff and other medical specialists, social workers and rehabilitation specialists in accordance with the needs of patients
120.	Ensure compliance with the requirements for obtaining voluntary, informed and duly documented informed consent of patients to medical interventions
121.	Strengthen control over the maintenance of medical records, in particular, the recording of cases of physical restraint and isolation
122.	Organise systematic training of medical staff on human rights, ethical standards of patient care and prevention of cruel or degrading treatment
123.	Ensure proper control over compliance with the requirements for the storage of medicines and prevent the use of expired medicines
124.	to conduct an information campaign among citizens on the free use of the package of medical services "Treatment of infertility with the

	help of assisted reproductive technologies (in vitro fertilisation)" within the framework of the Programme of State Guarantees of Medical Care for the Population
The Ministry of Social Policy, Family and Unity of Ukraine:	
125.	Together with the Pension Fund of Ukraine, develop and implement a mechanism of proper control to prevent unjustified reduction of pensions granted to war veterans by the territorial bodies of the Pension Fund of Ukraine, starting from 12.04.2023
126.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on the approval of the State Policy Strategy on Internal Displacement for 2026 and beyond
127.	Ensure the implementation and functioning of the System for recording information on damage to personal non-property rights
128.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution to amend the CMU Resolution of 25 April 2018 No. 306 "Some issues of establishing the connection between disability and injuries or other health damage", in order to transfer the authority to establish the connection between disability and injuries or other health damage from the Ministry of Veterans to the Ministry of Social Policy, as well as to simplify the procedure for establishing the connection between disability and injuries or other health damage
129.	Ensure systematic updating of information (at least once every two months) on the list of ICCs, reflecting the status, occupancy and distribution of beds, for further use in planning evacuations and attracting donor assistance
130.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution on amendments to the Resolution of the Cabinet of Ministers of Ukraine of 27 May 2025 No. 616 "Some issues of providing state support for the accommodation of internally displaced persons" in order to reimburse the cost of housing and communal services consumed by determining the average actual cost of housing and communal services consumed in the TACs per person, revising social standards for the consumption of housing and communal services, etc.
131.	to develop and submit to the Cabinet of Ministers of Ukraine a draft resolution that would provide for the possibility for IDP students to simultaneously enjoy the right to preferential (free) accommodation in dormitories of educational institutions and receive accommodation allowance as part of a holistic, targeted and non-discriminatory system of state support for young people affected by the armed aggression of the Russian Federation against Ukraine, as well as to ensure interagency coherence of approaches in the field of social and educational policy
132.	to develop and submit to the CMU a draft resolution amending Resolution of the Cabinet of Ministers of Ukraine of 14 May 2024 No.

	551, providing for a simplified mechanism for receiving the one-time assistance, as well as the exclusion of the requirement to have an individual plan of return and reintegration for persons aged 18 to 23 as a condition for the one-time assistance
133.	Ensure an information campaign on the mechanism of receiving a one-time support allowance for persons aged 18-23 who plan to return from TOT or after deportation, by preparing and disseminating explanations and step-by-step algorithms for applying
134.	Ensure that the Pension Fund of Ukraine continues to timely accrue and pay all types of state social assistance to recipients who have not received/received state social assistance in violation of the terms
135.	to ensure proper information and consultative assistance to recipients of state aid on the conditions and procedure for the appointment of state aid and the grounds for termination of such payments as defined by law
136.	to provide social support to the recipients of state aid in the process of preparation of documents required for the registration of state aid
137.	to develop and submit to the Cabinet of Ministers of Ukraine a draft decree on the approval of a national strategy for the protection of the rights and freedoms of persons forcibly displaced abroad from Ukraine, as well as the creation of the necessary conditions for their return to Ukraine, with clear roles for central executive authorities in the areas of consular support, social protection, education, healthcare and employment
138.	Ensure the continuation of initiatives to create a network of national unity hubs abroad and the development of the Unity App
139.	Ensure the implementation of the Operational Action Plan for the implementation in 2025-2027 of the Strategy for Reforming Psychoneurological and Other Residential Institutions and Deinstitutionalisation of Care for Adults with Disabilities and Older Persons by 2034, in particular in terms of the actual transition from formal care to a person-centred support system
140.	Ensure the regulatory and methodological regulation of social rehabilitation and preparation for independent living for persons in psychoneurological and other residential institutions
141.	To develop and approve methodological recommendations on the organisation of cultural and leisure activities in residential institutions, defining the functional responsibilities of the organiser of cultural and leisure activities, forms and types of work with the wards, taking into account their individual needs and the provisions of the Convention on the Rights of Persons with Disabilities
142.	To develop and approve the procedure for guardianship and trusteeship bodies to carry out activities related to the protection of the rights of adults in need of guardianship or trusteeship, as well as a

	mechanism for supervision and control over the exercise of the rights of incapacitated persons/ persons with limited legal capacity
143.	Develop, in cooperation with the Pension Fund of Ukraine and the State Border Guard Service of Ukraine, a mechanism for the exchange of information on the stay of citizens abroad for the purpose of housing subsidies and other types of social support
144.	Together with the Ministry of Education and Science of Ukraine and the Ministry of Internal Affairs of Ukraine, develop and approve a programme of interagency cooperation to conduct a broad awareness-raising campaign on the protection of children from participation in hostilities and armed conflicts
To the Ministry of Education and Science of Ukraine:	
145.	To develop and submit to the Cabinet of Ministers of Ukraine a draft decree on the approval of the Concept of access to education for children and youth from TOT
146.	Ensure compliance with uniform standards of a safe educational environment for educational institutions operating in frontline and de-occupied communities, taking into account the availability of certified shelters, evacuation routes, as well as warning and communication systems
147.	to amend the Procedure for Responding to Cases of Bullying (Harassment), approved by the Order of the Minister of Education and Science of Ukraine No. 1646 of 28.12.2019, to determine the authorised body in the regions that will verify compliance with the requirements by responders in the event of a case of bullying (harassment) in educational institutions
148.	Introduce the collection and synthesis of information on the number of cases of bullying in educational institutions and publish relevant data on a quarterly basis on the official website of the Ministry of Education and Science of Ukraine
149.	To develop and approve amendments to the norms for the provision of wardrobe items and bed linen for orphans and children deprived of parental care who are (were) in educational institutions of all types on full state support, approved by the Order of the Ministry of Education and Science of 17.11.2003 No. 763
150.	Continue to regularly update information from regional military administrations and local self-government bodies on attacks on educational institutions in the context of the armed conflict through monitoring in line with the goals of the Safe Schools Declaration
151.	Intensify the work of the Interagency Working Group on the implementation of the Safe Schools Declaration

152.	Ensure amendments are made to the Standard Staffing Standards for general secondary education institutions, approved by the Order of the Ministry of Education and Science of 06.12.2010 No. 1205, regarding the conditions for introducing the positions of practical psychologist and social pedagogue by reducing the minimum number of students
153.	To develop and ensure amendments to the Code of Administrative Offences, the Law of Ukraine "On Protection of Childhood" and the Procedure for Responding to Cases of Bullying (harassment) (Order of the Ministry of Education and Science No. 1646 of 28.12.2019) to unify the definition of the term "bullying (harassment)"
154.	To develop and approve a regulatory act to regulate the issue of introducing the position of teaching assistant in the staffing of professional higher education institutions
155.	to amend Order No. 910 of 24.06.2024 "On some peculiarities of acquiring and renewing the status of an education student" in terms of ensuring the possibility of transferring and renewing full-time education for students of professional higher education and higher education who have reached the age limit for basic military service and are not liable for military service
The Ministry of Internal Affairs of Ukraine:	
156.	To amend the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09 July 2018 in order to - bringing its provisions in line with the Resolution of the Cabinet of Ministers of Ukraine No. 138 of 10 March 2017, providing for a clear definition of the responsibility of balance holders for the maintenance and ensuring the proper technical condition of the objects of the civil defence facilities fund; - expanding the list of mandatory requirements for the arrangement of civil defence facilities, in particular, to ensure the provision of drinking water supplies, sanitary facilities, first aid kits, and barrier-free access for people with limited mobility
157.	Ensure information and awareness-raising activities by disseminating information about the "Hidden SOS Button" mobile application, in particular through the media, social networks, educational and medical institutions
The Ministry of Economy, Environment and Agriculture of Ukraine:	
158.	Amend the Orders No. 263 of 10.02.2025 "On Approval of the Rules for the Technical Operation of Landfills, Decommissioning, Reclamation and Care of Landfills after their Decommissioning" and

	No. 455 of 29.04.2024 "On Approval of the Requirements for the Plan for Bringing the Waste Disposal Site in Compliance with the Legislative Requirements" in terms of their entry into force
159.	Identify areas vulnerable to (accumulation of) nitrates and create a register of them
160.	Establish state monitoring of nitrate pollution of groundwater and surface water
To the Ministry of Digital Transformation of Ukraine:	
161.	Ensure the technical possibility of submitting information on real estate damaged and destroyed as a result of armed aggression against Ukraine since 19 February 2014 through the Diia portal
162.	introduce a mechanism for submitting applications to the international Register of Damage Caused by the Aggression of the Russian Federation against Ukraine through administrative service centres, in particular for persons who do not have access to the Diia portal or electronic means of identification
163.	Ensure that the functionality of the Diia portal, in particular the Diia mobile application, is supplemented to provide for the possibility of choosing reasons for deregistration through the Diia mobile application
164.	Develop and approve methodological recommendations for conducting information audit
165.	To develop and publish on the Unified State Open Data Web Portal recommendations for downloading datasets specified in the list of datasets to be published in the form of open data
The Ministry of Justice of Ukraine:	
166.	To develop and submit to the Cabinet of Ministers of Ukraine an updated National Human Rights Strategy, taking into account the consequences of the full-scale armed aggression of the Russian Federation against Ukraine
167.	develop and submit to the Cabinet of Ministers of Ukraine a legal act to revise the approach to the complete non-recognition of documents issued in TOT with a view to introducing legal mechanisms for the limited and controlled use of information from certain types of such documents (in particular, on the facts of birth, death, marriage, education, employment and property ownership) with clearly defined safeguards and verification procedures
168.	To develop a draft act on amendments to the Criminal Code of Ukraine in the part of Section I of the Special Part on criminalisation of acts of involvement (use) of minors and underage persons in committing criminal offences against the national security of Ukraine

169.	Ensure that the Ukrainian Parliament Commissioner for Human Rights, as an independent national human rights institution, can participate in meetings of the Committee of Ministers of the Council of Europe on Human Rights (DH) on the state of implementation of judgments of the European Court of Human Rights by the state in order to present an independent assessment of the state of their implementation in the field of human rights
170.	Develop and implement a comprehensive programme to combat segregation and discrimination among prisoners and convicts
171.	To place prisoners/convicts in residential premises in compliance with the space standards established by national and international legal acts
172.	to develop and implement a comprehensive programme to bring the conditions of detention in PIs and SIZOs in line with national and international standards, which should include improving the material and technical base, carrying out repair work in cell blocks, replacing communications, equipping with modern sanitary and hygiene facilities, introducing video surveillance systems, ensuring an adequate level of lighting (natural and artificial), and observing sanitation and hygiene conditions
173.	to amend the Internal Regulations of Penitentiary Institutions, approved by the Order of the Ministry of Justice of Ukraine No. 2823/5 of 28.08.2018, the Internal Regulations of Pre-trial Detention Centres of the State Penitentiary Service of Ukraine, approved by the Order of the Ministry of Justice of Ukraine No. 1769/5 of 14.06.2019, the Procedure for the use of technical means of supervision and control in correctional and educational colonies of the State Penitentiary Service of Ukraine, approved by the Order of the Ministry of Justice of Ukraine No. 2025/5 of 26.06.2018, and to regulate the use of
174.	To develop regulations that will define the procedure for the detention of prisoners of war in camps and include: - internal regulations of the camps; - the procedure for bringing prisoners of war to disciplinary responsibility; - peculiarities of their labour use and remuneration of prisoners of war; - organisation of bath and laundry services; - ensuring the regime, security and supervision in POW camps; - accounting and operation of furniture, inventory and household items and the standards for their provision and operation; - use of technical means of supervision and control
175.	Introduce an effective and efficient system of management control over the activities of POW camps

176.	take measures to ensure compliance with the principle of equivalence of medical care by bringing the level of medical services in penitentiary institutions in line with the standards guaranteed by the state for all citizens by transferring penitentiary medicine to a single medical space
177.	Ensure full integration into the EHS of the Ministry of Health of Ukraine and the single medical space
178.	Ensure systematic diagnosis, treatment and infection control of tuberculosis and viral hepatitis C in accordance with the standards of the Ministry of Health of Ukraine
179.	Strengthen the system of psychiatric care in the institutions of the SPS of Ukraine, ensuring the implementation of treatment programmes for people with mental and behavioural disorders, including those resulting from the use of psychoactive substances
180.	to ensure proper regulatory and organisational regulation of the activities of the Central Healthcare Centre of the SPS of Ukraine aimed at the actual implementation of the principle of equivalence of medical care in PIs and SIZOs
181.	to take measures to staff medical units with personnel, in particular general practitioners (family doctors), psychiatrists, dentists and clinical psychologists, by reviewing the conditions of remuneration, incentive mechanisms and simplifying employment procedures
182.	Ensure adequate funding for the procurement of medicines and medical devices, eliminating the practice of imposing the obligation to provide treatment on relatives of convicted and imprisoned persons
183.	to strengthen control over compliance with the procedure for documenting bodily injuries, ensuring mandatory notification of the prosecutor's office and proper preparation of medical documentation with photographic evidence
184.	Ensure the creation of appropriate conditions for the provision of medical care, including the arrangement of separate rooms for confidential reception of patients, premises for the storage of medical waste and isolation rooms for infectious patients in compliance with infection control standards
185.	Ensure the integration of convicts and prisoners into the SES and ensure the conclusion of declarations with a primary care physician, which will allow the right to medical services under the Medical Guarantees Programme
186.	Immediately ensure the continuity of treatment of chronic diseases, including diabetes, cardiovascular diseases and other conditions requiring constant pharmacotherapy, eliminating cases of lack of vital medicines
187.	Strengthen infection control measures, in particular, the separation of persons with tuberculosis and other infectious diseases, in accordance with sanitary and epidemiological requirements

188.	Ensure compliance with the principle of voluntariness in the provision of psychiatric care, with written informed consent for psychiatric examination and treatment being mandatory
189.	Expand the SMT programme, ensuring its availability in all institutions, including SIZOs, and guarantee the continuity of treatment
190.	Ensure that medical records are properly maintained, including full documentation of bodily injuries with photographs and a record of notification of the competent authorities
191.	to analyse the inconsistencies between the current provisions of the Criminal Code of Ukraine and other legal acts regulating the release of seizure of movable and immovable property, to prepare proposals for improving the legislation and submit them to the CMU in accordance with the established procedure
192.	to develop and submit to the CMU a draft law amending Article 41 of the Law of Ukraine "On Enforcement Proceedings" of 02.06.2016 No. 1404-VIII in terms of supplementing Article 41 with a mechanism for resuming enforcement proceedings, except out of court
193.	to develop and submit to the CMU a draft law amending the third paragraph of the third part of Article 63 of the Law of Ukraine "On Enforcement Proceedings" of 02.06.2016 No. 1404-VIII to determine the obligation of the enforcement officer to issue a resolution on the termination of enforcement proceedings as a result of sending a notice of a criminal offence committed by the debtor to the pre-trial investigation body after receiving confirmation of the relevant information being entered into the Unified Register of Pre-trial Investigations
194.	To develop and approve mandatory methodological explanations on the assignment of the first name, surname and patronymic in accordance with the national traditions of indigenous peoples and national minorities, as well as the application of the paragraphs of the Rules for State Registration of Civil Status Acts in Ukraine, approved by the Order of the Ministry of Justice of Ukraine of 18.10.2000 No. 52/5 on the possibility of assigning an atypical patronymic
195.	To amend the Rules for State Registration of Civil Status Acts in Ukraine, approved by Order of the Ministry of Justice of Ukraine of 18.10.2000 No. 52/5, in terms of determining the procedure for registering the birth of a child whose parents or other legal representatives do not have identity and citizenship documents
196.	Ensure quarterly control and on-site inspections of the implementation by territorial civil registration authorities of the provisions of the Rules for State Registration of Civil Status Acts in Ukraine, approved by Order of the Ministry of Justice of Ukraine No. 52/5 of 18.10.2000
197.	To organise and conduct comprehensive training for officials of territorial state authorities and local self-government officials

The Ministry of Foreign Affairs of Ukraine:	
198.	To take measures to expand membership in the International Coalition for the Return of Ukrainian Children to ensure the return of deported and forcibly displaced children to the territory of Ukraine
199.	Expand the capacity of embassies and consulates to support the electoral process
200.	Facilitate the opening of additional or temporary polling stations
201.	Develop and implement alternative ways of authorisation to the e-Consul system for Ukrainian citizens who do not have ID cards, access to the Diia mobile application or Ukrainian mobile banking
202.	Ensure mandatory and clear informing of Ukrainian citizens abroad about the availability of alternative procedures for accessing consular services in case of impossibility of electronic identification through the e-Consul system, in particular through official web resources and communication channels of foreign diplomatic missions
203.	To address the UN Commission on the Status of Women with the issue of developing a recommendation to grant national human rights institutions the right to participate in the work of the UN Commission on the Status of Women separately from the government
204.	to ensure, within the framework of the Human Dimension Working Group, the active implementation of advocacy measures for the return of three categories of the Ukrainian population, namely: prisoners of war; civilians illegally detained in the Russian Federation or on the temporarily occupied territories of Ukraine; deported and forcibly displaced Ukrainian children
205.	Ensure timely and regular information and invitation of the Commissioner to the planned meetings of the International Coalition for the Return of Ukrainian Children, including international side events, conferences and special events
206.	Ensure that the Commissioner has access to all materials, documents and decisions discussed at the meetings of the International Coalition for the Return of Ukrainian Children for timely response and formulation of proposals from the national human rights institution
207.	Strengthen the capacity of foreign diplomatic and consular missions by expanding the coverage of at least 30 per cent of the total number of employees with specialised training on combating human trafficking
208.	To appeal to international partners to intensify pressure on the aggressor state to release civilians illegally deprived of their personal liberty as a result of armed aggression against Ukraine

To the Ministry of Finance of Ukraine:	
209.	Provide for separate budget programmes or expenditures related to the organisation of elections abroad
Ministry of Communities and Territories Development of Ukraine / regional military administrations:	
210.	Develop and implement regional support programmes for children and youth who have returned to government-controlled territory after deportation, forced displacement or from the temporarily occupied territories
211.	To develop an algorithm for interaction between actors involved in working with children to ensure the registration/exchange of information on evacuated (displaced) families with children to safe areas, monitoring of such families, prompt response and, if necessary, taking measures to provide social support to such families with children
212.	Ensure coordination of demining activities in the areas adjacent to educational institutions as a prerequisite for the resumption of full-time education in the de-occupied territories
The State Service of Ukraine for Children:	
213.	To ensure the process of returning Ukrainian children from the temporarily occupied territories and the territory of the Russian Federation, to conduct explanatory work for guardianship and custody bodies on the practical application of paragraphs 79-79 ⁽³⁾ of the Procedure for the implementation by guardianship and custody bodies of activities related to the protection of children's rights, approved by the Cabinet of Ministers of Ukraine of 24.09.2008 No. 866, in terms of granting children the status of orphan and child deprived of parental care, registering such children and establishing guardianship/custody over them
The State Service for Special Communications and Information Protection of Ukraine:	
214.	To strengthen control over the state of cyber defence of state information resources, restricted information and critical information infrastructure
To the State Service of Ukraine for Ethnic Policy and Freedom of Conscience:	

215.	In order to overcome the undocumented status of persons from the Roma national minority (community), within the framework of the Interagency Working Group on Coordination of the Implementation of the Strategy for Promoting the Rights and Opportunities of Persons Belonging to the Roma National Minority in Ukrainian Society for the Period up to 2030, ensure the implementation in 2026 of the measure to develop methodological recommendations for state authorities and local self-government bodies on the identification of undocumented persons, including representatives of the Roma national minority.
216.	Develop in dialogue with representatives of indigenous peoples of Ukraine and submit to the Cabinet of Ministers of Ukraine draft by-laws to regulate the procedure, conditions and scope of enjoyment of the rights and freedoms provided for by the Law of Ukraine "On Indigenous Peoples of Ukraine"
217.	Ensure an adequate level of awareness-raising on the rights of persons belonging to national minorities (communities), as well as mechanisms for their implementation, by preparing and disseminating generalised methodological materials for local executive authorities and public associations
218.	To develop and submit to the Cabinet of Ministers of Ukraine a draft legal act to regulate the procedure and mechanisms of interaction between the SES, regional, Kyiv and Sevastopol city state administrations on the implementation of state policy in the field of national minorities (communities) and indigenous peoples of Ukraine
219.	To strengthen the coordination and methodological role in cooperation with regional state (military) administrations and representative organisations of national minorities (communities) in order to ensure proper understanding and application of procedures provided for by the legislation in the field of ethnic policy, in particular, regarding the establishment and functioning of the Centres of national minorities (communities) of Ukraine
220.	To develop, in dialogue with representatives of indigenous peoples of Ukraine, draft amendments to the Law of Ukraine "On Indigenous Peoples of Ukraine" to regulate the specifics of the use of languages of indigenous peoples of Ukraine during public, cultural and other events, in advertising and during election campaigning
The State Border Guard Service of Ukraine:	
221.	Introduce a programme for the comprehensive elimination of systemic shortcomings in the area of procedural guarantees in temporary detention centres by introducing mandatory and documented involvement of interpreters during detention and preparation of procedural documents;

	providing detainees with information about their rights in an understandable language; strict compliance with the obligation to notify close relatives of the fact of detention; conducting systematic training of personnel on the standards of national and international law
222.	Ensure systematic training of personnel on the observance of equal rights and freedoms, non-discriminatory treatment of persons, in particular on the grounds of sexual orientation and gender identity
To the State Migration Service:	
223.	to unify the procedure for exercising the right of foreigners and stateless persons to communicate with the outside world (the possibility to use their own mobile phones freely during the day) in TACs by amending the Instruction on the procedure for detention of foreigners and stateless persons in temporary accommodation centres for foreigners and stateless persons, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 141 of 29.02.2016, and to eliminate excessive discretionary powers of TAC administrations based on the identified positive practices.
224.	Ensure the use of localised rooms in TACs in accordance with the requirements of the regulatory framework. Initiate amendments to the Instruction on the procedure for the detention of foreigners and stateless persons in temporary accommodation centres for foreigners and stateless persons, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 141 of 29.02.2016
225.	Ensure regular on-site consultations and awareness-raising events in places of compact residence of Roma (at least once a quarter), with the involvement of: employees of the territorial bodies of the SMS, local self-government officials, representatives of non-governmental organisations (upon agreement), in order to raise the level of legal awareness of the Roma population on obtaining identification documents, promote social integration and reduce the number of undocumented persons
State Judicial Administration of Ukraine:	
226.	Ensure compliance with the requirements of DBN B.2.2-26:2010 and the Instruction on the organisation of escorting and holding in courts of accused (defendants) convicted at the request of courts, approved by the joint order of the Ministry of Internal Affairs of Ukraine, the Ministry of Justice of Ukraine, the Supreme Court of Ukraine, the High Specialised Court of Ukraine for Civil and Criminal Cases, the State

	Judicial Administration of Ukraine, the Prosecutor General's Office of Ukraine of 26.05.2015 No. 613/785/5/30/29/67/68, by providing - cells for the accused (defendants), convicts with an area of not less than 4 m² at the rate of three cells per courtroom for consideration of criminal cases - sanitary facilities for accused (defendants) and convicts; - isolated routes for escorting accused (defendants) and convicted persons to courtrooms
The State Bureau of Investigation:	
227.	To develop and approve a programme of measures aimed at: - Ensuring observance of the right to respect for the dignity of persons during detention; - proper recording of each case of use of physical force and special means with subsequent control by the management; - conducting procedural actions with detainees exclusively in specially equipped premises with mandatory audio and video recording; - guaranteeing timely and unimpeded access of detainees to a defence counsel
228.	Ensure control over the implementation of the requirements of part four of Article 535 of the CPC of Ukraine, according to which bodies and persons executing a court decision shall notify the court that issued the court decision of its execution
The Security Service of Ukraine:	
229.	Ensure control over the implementation of the requirements of part four of Article 535 of the CPC of Ukraine, according to which the bodies and persons executing a court decision shall notify the court that issued the court decision of its execution
The Office of the Prosecutor General:	
230.	To organise checks on the timeliness of entering information into the URPTI based on criminal cases considered by courts in accordance with the procedure that was in force before the CPC of Ukraine as amended on 13 April 2012 No. 4651-VI came into force and which were returned to prosecutors for additional investigation, as well as the existence of grounds for restriction of rights in connection with the effect of decisions in these cases on preventive measures, seizure of property, removal from office, which were applied during the inquiry and pre-trial investigation before the entry into force of this Code

231.	Ensure control over the fulfilment of the requirements of part four of Article 535 of the CPC of Ukraine, according to which the bodies and persons executing a court decision shall notify the court that issued the court decision of its execution
The General Staff of the Armed Forces of Ukraine:	
232.	jointly with the Commands of the branches of the Armed Forces of Ukraine, within the limits of their competence, to ensure that commanders of military units and military administration bodies comply with the recommendations of the MEC and healthcare institutions regarding the referral of servicemen under their command for medical examination by the MEC in order to determine the degree of their fitness for military service
the Main Department of the Military Law Enforcement Service in the Armed Forces of Ukraine:	
233.	To ensure control over the command's compliance with the requirements of orders and instructions of the military command regulating the discharge of servicemen from military service. In case of non-compliance with the latter, to take measures within its competence to bring the commanders responsible for non-compliance with these requirements to the responsibility established by law
The National Police of Ukraine:	
234.	To develop and publish recommendations for the prevention of fraud and safe behaviour on the Internet, in particular, to explain the mechanisms for recording and reporting unlawful facts and the algorithm of priority actions for victims
235.	To enter into the URPTI information on criminal offences under the jurisdiction of the State Bureau of Investigation and to immediately inform the territorial offices of the State Bureau of Investigation of the facts of use of physical force by police officers against citizens
236.	To develop and approve the procedure for actions upon receipt of information that may indicate the commission of a criminal offence by a police officer (beatings, use of special means and physical force, illegal detention), taking into account the criteria for the effectiveness of the investigation (independence and impartiality, thoroughness, urgency, competence, involvement of victims and public control)
237.	introduce a unified accounting system for recording cases of use of special means and measures of physical influence, including keeping journals, registers or books, and ensure mandatory written notification of the supervisor of each case in order to control the legality of the use

238.	To develop and approve departmental regulations that provide for the establishment and operation of institutions for the detention of persons subject to administrative arrest and held in custody for more than 72 hours, as well as to expand the range and frequency of available activities during the period of detention of such persons in temporary detention centres
239.	to amend the Instruction on ensuring the regime of detention and protection of persons held in temporary detention facilities of the National Police of Ukraine, approved by the Order of the Ministry of Internal Affairs of 25.09.2023 No. 777, by supplementing it with provisions on the procedure for the staff of temporary detention facilities during the announcement of the "Air Alert" signal and other military threats
240.	until the Instruction is amended, develop and communicate to each temporary detention facility methodological recommendations with step-by-step actions and distribution of responsibilities that the staff must perform immediately upon receiving the "Air Alert" signal
241.	Ensure control over the fulfilment of the requirements of part four of Article 535 of the CPC of Ukraine, according to which the bodies and persons executing a court decision shall notify the court that issued the court decision of its execution
242.	To strengthen control over the fulfilment by offenders of the obligation to undergo programmes for offenders, in particular in terms of timely referrals and response to evasion of the programme
To the National Bank of Ukraine:	
243.	Ensure educational activities and provide recommendations for citizens on payment security, cyber hygiene and the rights of consumers of financial services to prevent fraud
244.	Ensure systematic methodological and explanatory work with banks on the application of financial monitoring approaches taking into account the needs of persons with disabilities, in particular by organising thematic seminars
245.	Introduce an expert assessment of the accessibility of bank services for persons with disabilities
The National Anti-Corruption Bureau of Ukraine:	
246.	To introduce a set of measures aimed at fulfilling the requirements of the CPC of Ukraine in terms of approving internal regulations that define the powers, rights and duties of officials responsible for observing the rights of detainees, as well as a clear

	procedure for recording all actions in relation to detainees, and to appoint such responsible persons
The National Social Service of Ukraine:	
247.	To develop and implement an algorithm of joint actions with regional military state administrations, local self-government bodies as guardianship and custody authorities to process and verify information about children left without parental care, taken from their legal representatives abroad , about their relatives and their place of stay/residence. To inform the Commissioner on the results of the work carried out on a monthly basis by the 05th day of the month following the reporting month
to the Central Election Commission by 05 of the month following the reporting period:	
248.	Introduce more flexible mechanisms for establishing temporary polling stations in places of compact residence of Ukrainians
249.	Improve the information of Ukrainian citizens abroad on electoral procedures
To the heads of local general courts:	
250.	To ensure systematic verification (monitoring) of compliance with the law in courts in terms of timely appeal for enforcement of rulings of investigating judges
Vinnytsia, Volyn, Dnipropetrovs'k, Zhytomyr, Zakarpattia, Zaporizhzhia, Ivano-Frankivsk, Kyiv, Kirovohrad, Lviv, Mykolaiv, Odesa, Poltava, Rivne, Sumy, Ternopil, Kharkiv, Kherson, Khmelnytskyi, Cherkasy, Chernihiv, Chernivtsi regional state (military) administrations, Kyiv city state (military) administration:	
251.	Ensure proper control over the activities of residential institutions with regard to the implementation of social rehabilitation measures and preparation of wards for life in the community
252.	To strengthen control over the comprehensive assessment of individual needs of social service recipients, the preparation of individual plans for the provision of social services and their regular review
253.	To create conditions for the development of creative, professional and intellectual potential of the wards

254.	Ensure interagency cooperation between social security institutions and local self-government bodies in order to integrate the wards into the life of territorial communities
255.	Introduce annual mandatory training for staff of social care institutions on the observance of the right to liberty and security of person and the prevention of cruel, inhuman or degrading treatment
256.	Provide methodological support and training for staff of residential institutions on the organisation of meaningful occupational therapy in residential institutions
257.	Ensure systematic control over the observance of the right to freedom of movement of wards in social care institutions
258.	Ensure systematic control over the observance by residential institutions of the right of legally capable wards to own, use and dispose of their own funds, including pension payments and other types of social assistance
259.	Ensure that measures are taken to respond to the identified facts of mismanagement of wards' funds, including by initiating internal inspections and informing law enforcement agencies in case of signs of criminal offences
Donetsk, Kirovohrad, Luhansk, Mykolaiv, Poltava, Sumy, Kherson, Khmelnytskyi, Cherkasy, Chernihiv regional state (military) administrations:	
260.	create conditions in cluster and supercluster hospitals of regional subordination for concluding contracts with the NHSU for the package of medical services "Treatment of infertility with the help of assisted reproductive technologies (in vitro fertilisation)"
Vinnytsia, Volyn, Dnipropetrovs'k, Donetsk, Luhansk, Zhytomyr, Kirovohrad, Kyiv, Mykolaiv, Odesa, Sumy, Ternopil, Kharkiv, Khmelnytsky, Cherkasy, Chernivtsi, Chernihiv, and regional state (military) administrations:	
261.	To approve regional waste management plans for
Vinnytsia, Volyn, Dnipropetrovs'k, Zhytomyr, Zakarpattia, Zaporizhzhia, Ivano-Frankivsk, Kyiv, Kirovohrad, Lviv, Mykolaiv, Odesa, Poltava, Rivne, Sumy, Ternopil, Kharkiv, Kherson, Khmelnytskyi, Cherkasy, Chernihiv, Chernivtsi Oblast Councils, Kyiv City Council:	
262.	Take measures to ensure staffing of residential institutions, including the inclusion of social work specialists and organisers of cultural and leisure activities in the staffing lists and staff development on deinstitutionalisation and social integration of persons with disabilities

Regional and Kyiv city military administrations, local self-government bodies:	
263.	Immediately provide for the expenditures for 2026 to implement paragraph 10 of the Procedure for the Return to Ukraine of Orphans and Children Deprived of Parental Care who are Citizens of Ukraine, approved by the Cabinet of Ministers of Ukraine of 23.04.2003 No. 569
264.	Ensure that children are granted the status of orphan and child deprived of parental care, are registered in the primary register of such children and that guardianship/custody is established over them under a simplified procedure, in accordance with the requirements of paragraphs 79-79 ⁽³⁾ of the Procedure for the implementation by guardianship and custody authorities of activities related to the protection of children's rights, approved by the Resolution of the Cabinet of Ministers of Ukraine of 24.09.2008 No. 866 by persons who are in family or kinship relations with an orphan or a child deprived of parental care, with the aim of returning him/her from the temporarily occupied territory and the territory of the Russian Federation
265.	Ensure that the population remaining in the territories undergoing mandatory evacuation is informed on a regular basis about the need to timely report to the hotline in case of establishing the fact of abandonment of a child/return of a family with a child
266.	Inform parents of children, in particular by sending messages to their phones and messengers, about the consequences if they return with their children to the territory where mandatory evacuation is carried out
267.	To conduct explanatory work among families with children on the right to deferment of military service during mobilisation in accordance with Article 23 of the Law of Ukraine "On mobilisation preparation and mobilisation", as well as on the right to discharge from military service in accordance with Article 26 of the Law of Ukraine "On military duty and military service" in order to ensure the right of children to be brought up in a family environment
268.	Ensure control over the activities of subordinate educational institutions to prevent the dissemination of excessive amounts of personal data of participants in the educational process
269.	To take into account the needs of places of compact residence of the Roma national minority (community) when developing and updating master plans and urban planning documentation in order to overcome spatial segregation and ensure equal access of residents to transport, engineering and social infrastructure
270.	To conduct an inventory of land plots and residential buildings in the areas of residence of the Roma national minority (community) in

	order to regulate land and property relations and create legal grounds for further legalisation of development
271.	Ensure that up-to-date information on the mechanisms for establishing the status of a person who has suffered from human trafficking, on the types of state assistance and where such assistance can be obtained is posted on official websites
272.	Ensure regular meetings of advisory and consultative bodies with the inclusion of issues related to combating human trafficking on the territory of the administrative unit on the agenda of such meetings
273.	Ensure an even distribution of specialists responsible for implementing programmes for offenders, taking into account the number of persons referred to programmes for offenders
274.	To ensure on an ongoing basis awareness-raising activities for representatives of national minorities (communities) in order to raise their awareness of the rights and freedoms guaranteed and the mechanisms for their implementation established by law
VINNYTSIA REGION	
Vinnytsia regional state administration, regional military administration:	
275.	Bring the places of temporary residence of IDPs in line with the requirements approved by the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Cabinet of Ministers of Ukraine on 1 September 2023, No. 930
276.	Facilitate the attraction of additional resources, including state programmes, humanitarian aid and international technical support for repair and restoration work in places of temporary residence of internally displaced persons
277.	Ensure that educational institutions comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition
Local self-government bodies:	
278.	Ensure barrier-free and accessible premises in the territorial community's institutions for people with disabilities and low-mobility groups by approving and implementing relevant action plans, identifying responsible persons
279.	ensure publication on official websites of the information provided for by the Law of Ukraine "On Access to Public Information" and exercise of the right to submit an oral appeal, in particular, by calling the contact number published on the official website

280.	Ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans
281.	To intensify work on the creation of family-based forms of upbringing in each territorial community as a priority model for the protection of children's rights
282.	Ensure that places of temporary residence of IDPs are brought in line with the established standards and that a fund of housing for temporary residence is formed, including proper accounting of needs
283.	Introduce internal procedures for organising work with personal data and control over their protection, and identify a responsible person who organises work related to the protection of personal data during their processing
284.	Establish a mechanism for prompt exchange of information and strengthen cooperation with relevant children's services for timely review and proper execution of individual social protection plans for children
Vinnitsia Regional Territorial Centre for Recruitment and Social Support:	
285.	To strengthen communication and systematic informing of the families of POWs and persons missing under special circumstances on issues within the competence of the TCC and JRB to ensure proper exercise of powers and increase public trust
VOLYN REGION	
Volyn regional state administration, regional military administration:	
286.	To publish on the official website of the Volyn Regional Military Administration the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
287.	to ensure the posting of up-to-date contact details, schedules of work of the hotlines, as well as proper recording of oral appeals
288.	publish information of public interest, in particular, on the procedure for submission and consideration of requests for public information; procedures for appealing against decisions, actions or inaction of officials; vacancies; use of budget funds and access to open data
289.	Provide for funding and coordination with local governments and balance holders of the facilities on the basis of which temporary accommodation places operate in order to bring the living conditions of

	internally displaced persons in line with the minimum requirements stipulated by the Procedure for the functioning of temporary accommodation places for IDPs, approved by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of temporary accommodation places for internally displaced persons"
290.	Ensure that regional subordination institutions providing services to children comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition
291.	Ensure that institutional care facilities are staffed with qualified practical psychologists in accordance with established standards
292.	to provide institutional care facilities with a sufficient number of medical staff to organise and carry out round-the-clock duty, provide timely medical care, and to conduct constant monitoring of the organisation and quality of food
293.	Ensure intersectoral cooperation with state authorities, the public sector and business to arrange a transit centre in Volyn region in close proximity to the Domanove-Mokransky checkpoint to ensure a systematic approach to the reception of Ukrainian citizens returning from the temporarily occupied territories
294.	Ensure architectural accessibility for persons with disabilities and other low-mobility groups to institutions, as well as civil protection facilities of municipal and state ownership, primarily healthcare, education and social facilities
Local self-government bodies:	
295.	Ensure observance of the right to information by publishing and regularly updating on the official websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
296.	Ensure architectural accessibility of civil protection facilities on the territory of communities, and exercise constant control over ensuring unimpeded access to them for citizens
297.	Ensure compliance with the legislation on the organisation of medical care and nutrition in community educational institutions
298.	Ensure control over the timely removal by educational institutions of documents containing personal data of students from open access on their websites by depersonalising them
289.	To train managers and responsible employees of educational institutions on the rules of safe processing, depersonalisation, storage and publication of personal data
300.	Ensure compliance with the requirements of the Law of Ukraine "On Personal Data Protection" and the Model Regulation on Personal

	Data Processing approved by the Order of the Ukrainian Parliament Commissioner for Human Rights No. 1/02-14 dated 08.01.2014, in particular, regarding the appointment of a person responsible for organising the processing and protection of personal data, proper informing of personal data subjects and ensuring the separation of employees' access to such data
301.	Ensure that the rights of residents in residential care units of communal institutions are respected through the proper implementation of legislation on social protection, medical care, creation of a barrier-free environment and guaranteeing the right to privacy and respect for dignity, with the introduction of mechanisms to prevent repeated violations
Volyn Regional Territorial Centre for Recruitment and social support:	
302.	Strengthen internal control and preventive measures by conducting additional briefings with personnel, official inspections for each fact of possible violations of the procedure during mobilisation activities
303.	Introduce quarterly monitoring of the status of consideration of appeals and requests for information, in particular through internal inspections
304.	to ensure that officials of the recruitment centres strictly comply with the requirements of the current legislation of Ukraine during the implementation of mobilisation measures, including in terms of preventing the abuse of power, use of physical force, psychological pressure and other unlawful actions against citizens
305.	Ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the timeframe established by law
The territorial department of the State Judicial Administration of Ukraine in Volyn region and the courts of Volyn region:	
306.	Ensure the elimination of systemic violations in courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated convoy routes and arranging rooms for confidential communication with lawyers
307.	Strengthen logistical support to ensure respect for human rights, in particular the rights to dignity, security, accessibility and effective defence

DNIPROPETROVSKA OBLAST**Dnipro regional state administration, regional military administration:**

308.	Ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, including those in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930, with the possibility of further confirmation of compliance with the established standards
309.	Facilitate the attraction of additional resources, including government programmes, humanitarian aid and international technical support for repair and restoration work in places of temporary residence of internally displaced persons
310.	Strengthen information and awareness-raising activities to encourage the development of foster families in the region
311.	Ensure that educational institutions comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition
312.	Exercise control to prevent excessive temporary placement of children in healthcare facilities

Local self-government bodies:

313.	Provide for expenditures in local budgets for current and capital repairs, sanitation, disinfection and renewal of the material and technical base of dormitories where temporary accommodation facilities and shelters operate
314.	To strengthen control over the technical condition of the premises of temporary accommodation for internally displaced persons, as well as to ensure compliance with their right to safe, proper and decent living conditions in accordance with established standards
315.	Ensure that the guardianship and trusteeship authorities properly exercise their powers in the area of housing for family-based care
316.	To equip protective structures in pre-school and secondary education institutions to ensure the safety of participants in the educational process during training
317.	Ensure availability of information on the procedure for exercising the right to apply and submit requests for public information on the website and in the premises of local self-government bodies. Provide for the possibility of submitting oral appeals, pre-registering for an appointment with recording of appeals, publishing information of public interest, in particular on the procedure for appealing decisions, and

	providing for a workplace for reviewing documents, copying, scanning and saving them on media
Dnipro Regional Centre for Recruitment and Social Support:	
318.	Ensure timely and proper consideration of appeals from servicemen, veterans, persons liable for military service and members of their families with mandatory compliance with the requirements of the Law of Ukraine "On Citizens' Appeals"
319.	in order to ensure proper exercise of powers and increase the level of public trust, to strengthen communication and systematic informing of families of prisoners of war and persons missing under special circumstances on issues within the competence of the TCC and JV, in particular, on the procedure for submitting and reviewing appeals, algorithms for interaction with authorised bodies, approximate timeframes for processing documents and available mechanisms for protecting rights and social guarantees
320.	Ensure objective, comprehensive and individual verification of the grounds for granting deferment from conscription in accordance with the requirements of the law, with proper documentation of the decisions taken and their motivation in order to respect the rights of citizens and prevent a formal approach during the implementation of mobilisation measures
Military command and control bodies:	
321.	To prevent violations of the rights of persons held in brig, ensure that the conditions of detention are brought in line with the requirements of national legislation and international standards, ensure that bodily injuries are properly recorded in accordance with established procedures, and organise dietary food for medical reasons
DONETSK AND LUHANSK REGIONS	
Donetsk regional state administration, regional military administration:	
322.	to approve and implement an interagency algorithm for organising the evacuation of civilians in Donetsk region, covering all stages: from the moment of receipt of an evacuation request, organisation of notification and collection of persons, their transportation, escort, registration and transfer to the receiving party to placement in places of temporary stay in safe regions, with the identification of responsible entities at each stage

323.	Provide for informing the services for children of the host regions about families with evacuated children in order to further support them, ensure timely granting of the status of persons in difficult life circumstances to evacuated children and monitoring their stay
324.	In the first half of 2026, in order to develop common approaches to the evacuation of children from the areas of hostilities, improve coordination and interaction, and identify problematic issues for further resolution, hold an extended protocol meeting with the leadership of communities, cities and districts of Donetsk region on the issue of ensuring the inalienable rights of children, including through evacuation from the areas of hostilities, including by force
325.	Provide local executive authorities of territorial communities, within their powers, with practical, methodological and advisory assistance in resolving issues related to obtaining the status of a child affected by hostilities and armed conflicts. In the first half of 2026, hold a protocol meeting on this issue and submit the minutes of the meeting to the Commissioner
Luhansk regional state administration, regional military administration:	
326.	To conduct a comprehensive analysis of the state of functioning of municipal institutions established or subordinated to local military administrations of the region, including educational, healthcare and other institutions providing socially important services, in terms of their actual performance, objective ability to perform their functions and ensure the availability of relevant services to the population. The results of the analysis shall be submitted to the Commissioner.
327.	Provide local executive authorities of territorial communities, within their powers, with practical, methodological and advisory assistance in resolving issues related to obtaining the status of a child affected by hostilities and armed conflicts. In the first half of 2026, hold a protocol meeting on this issue and submit the minutes of the meeting to the Commissioner.
Local self-government bodies:	
328.	Ensure that the population is informed about the possibility of obtaining the status of a child affected by hostilities and armed conflicts by applying to the guardianship and custody authorities of the child's community of origin. To inform the public, use existing websites of military administrations and regional media.
ZHYTOMYR REGION	

Zhytomyr Regional State Administration, Regional Military Administration:	
329.	To strengthen coordination and control over compliance with the minimum requirements for the life support of internally displaced persons, as well as free accommodation in places of temporary residence, including on the basis of dormitories of higher education institutions, in accordance with the minimum standards of functioning defined by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons"
330.	Ensure full implementation of the recommendations provided as a result of monitoring visits to the ICC in 2023-2025
331.	Provide methodological and practical assistance to local executive authorities and local self-government bodies, in particular to children's services, in promptly resolving issues related to child social protection
332.	Ensure full compliance of organisational and administrative documents with the requirements of the Law of Ukraine "On Personal Data Protection", with the identification of responsible persons, as well as with the procedure for access and destruction of data
Local self-government bodies:	
333.	Ensure timely responses to requests for information and appeals from citizens in accordance with the requirements of the law
334.	Ensure timely updating of public information on official websites
335.	to organise systematic control over the condition of civil protection facilities, especially for people with limited mobility, to ensure their suitability and unimpeded access
336.	Ensure coordination of the activities of entities identifying and/or organising social protection of children in difficult life circumstances
337.	To take urgent measures to streamline the personal files of children in difficult life circumstances, orphans and children deprived of parental care in accordance with the law
338.	Take urgent measures to ensure that children who have reached the age of 14 receive a passport of a citizen of Ukraine in a timely manner
339.	publish information on the websites of information managers in accordance with the requirements of the Law of Ukraine "On Access to Public Information"
340.	Ensure personal receptions of citizens by officials in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals"

To the balance holders of the objects of the fund of protective structures:	
341.	To bring civil protection objects to a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for Maintenance and Operation of Civil Protection Facilities, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018 "On Approval of Requirements for Maintenance, Arrangement and Operation of Civil Protection Facilities, Accounting of the Civil Protection Facilities Fund, Determination of Criteria for Impossibility of Further Maintenance and Operation".
342.	Ensure round-the-clock access to civilian population, including people with reduced mobility, to civil protection objects
343.	Ensure clear marking and navigation of civil protection objects
Main Department of the National Police in Zhytomyr region:	
344.	Ensure proper implementation of the requirements of Article 212 of the Criminal Procedure Code of Ukraine
345.	To equip the territorial police units with rooms for detainees, the conditions of detention in which meet national and international standards
346.	Ensure that procedural (investigative) actions with detainees and other procedural actions are conducted in specially equipped rooms with mandatory video recording of such actions in accordance with the established procedure
347.	To equip territorial police units with a room for investigative actions and a room for confidential meetings of detainees with defence counsels
348.	to equip an office (workplace) of the human rights inspector in the territorial police units
349.	To conduct training for police officers on first aid in territorial police units and to ensure that they receive certificates of the established form
350.	To equip civil protection facilities in accordance with the requirements of the current legislation and to ensure that personnel of the facility take security measures when announcing the "Air Alert" signal in Zhytomyr region
351.	Ensure storage and placement of fire extinguishers in territorial police units in accordance with the requirements of the law
352.	Ensure access for persons with disabilities and other low-mobility groups to premises and sanitary facilities in territorial police units
ZAKARPATTIA REGION	

The Main Department of the National Social Service in Zakarpattia Oblast shall, in 2026, carry out state supervision (control) in all territorial communities of Zakarpattia Oblast:	
353.	Compliance with the requirements of the legislation in the field of child protection, in particular in children's services and social service providers to families and children (social service centres, social services, territorial centres of social services (social services). Inform the Commissioner on the results of the state supervision (control), providing copies of acts and other inspection materials by the 25th day of each month
354.	To monitor compliance with the requirements of the law in the provision of social support and observance of children's rights, taking into account the goals and objectives of the Strategy for Ensuring the Right of Every Child in Ukraine to Grow Up in a Family Environment for 2024-2028, approved by the Cabinet of Ministers of Ukraine on 26.11.2024 No. 1201-p, and inform the Commissioner with copies of acts and other inspection materials by 01.08.2026 and 31.12.2026
355.	interagency cooperation, on the part of children's services and social service centres / social service centres and interagency cooperation of entities preventing and combating domestic violence, in order to prevent violations of the rights of children and their families to receive adequate social protection and ensure their social support, basic social services and on the results of state supervision (control) to inform the Commissioner with copies of acts and other inspection materials by the 25th day of each month
356.	To monitor the observance of children's rights to health improvement and recreation in all health camps of the Transcarpathian region and to inform the Commissioner with copies of the acts and other inspection materials by 01.08.2026 and 31.12.2026 based on the results of the state supervision (control) conducted
The Transcarpathian Regional State Administration and the Regional Military Administration shall provide:	
357.	to provide local self-government bodies of Zakarpattia region, within their powers, with practical, methodological and advisory assistance in addressing issues related to social protection of children and activities of local services for children (hereinafter referred to as the service) and social service providers, in particular, in identifying and responding to cases of difficult life circumstances, threats to children's life and health, and domestic violence. To inform the Commissioner on the implementation of the recommendation about the measures taken

	and supporting documents, indicating the services that received assistance, by the 25th day of each month
358.	To include in the List of temporary accommodation places in Zakarpattia region the premises created or equipped with international assistance for temporary accommodation of internally displaced persons located at the following addresses: Uzhhorod district, Dubrynychy village, 60 Bereh Street, and Durynychy village, 73 Tsentralna Street, for the persons. Provide free accommodation for internally displaced persons in the above-mentioned premises, as well as in the premises at the following address: Uzhhorod district, Chertezh village, 37 Myr Street, who are evacuated from the areas of active hostilities and inform the Commissioner by 01.06.2026
The Transcarpathian Regional State Administration, the Regional Military Administration together with the local self-government bodies on the territory of which the places of temporary residence of IDPs are located shall provide:	
359.	Conduct on-site monitoring visits to all places of temporary residence of internally displaced persons included in the ICC List of Transcarpathian region in order to collect and analyse data in accordance with the checklist for monitoring the condition and arrangement of ICCs, as provided for in the Procedure for the functioning of temporary residence places of IDPs, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930. Take measures to eliminate the identified violations of the minimum requirements for the life support of internally displaced persons and inform the Ombudsman about the results of the visits at , indicating the number of visits conducted, violations identified and eliminated by 31.12.2026
Bedevlyanska, Velykodobronska, Vilkhovetska, Kostrynska, Onokivska, Polyanska, Kholmivska rural, Bativska, Velykyi Bereznyi, Dubivska, Kolchynska, Mizhhirska, Serednyanska, settlement, Berehivska, Vynohradivska, Perechynska, Chopska urban territorial communities to provide:	
360.	Bring the number of employees of children's services in line with Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" in order to respond properly and effectively to cases of violation of children's rights and protect their best interests, and inform the Commissioner on the implementation of the recommendation by 01.08.2026
361.	To develop, approve and implement local programmes for the protection of children's rights, prevention of violence and social orphanhood, with specific goals, measures, responsible executors,

	sources of funding and control mechanisms, and to inform the Commissioner about the results of the work done by 01.08.2026
362.	To ensure placement of orphans and children deprived of parental care, who are on the primary register of children's services, in family and close to family forms of upbringing and to inform the Commissioner about the results of the work done by 31.12.2026
Velykoluchkivska, Velykoberezka, Horondivka, Ivanovo, Koson, Nelipynka, Pyiterfolva village and Bativska, Chynadiyivka settlement territorial communities of Zakarpattia Oblast to ensure:	
363.	Establishment and functioning of a communal social service provider, in accordance with the requirements of the Law of Ukraine "On Social Services", in order to ensure proper organisation and accessibility of basic social services for community residents, primarily children, families with children, persons in difficult life circumstances, internally displaced persons and other vulnerable categories of the population, for the proper exercise of powers by local self-government bodies in the field of social protection of the population and to inform the Ombudsman's Office about the results of the work done
Local self-government bodies to ensure:	
364.	publish and update information on official websites in accordance with the requirements of Article 15 of the Law of Ukraine "On Access to Public Information"
The Main Department of the State Emergency Service of Ukraine in Transcarpathian region:	
365.	to organise and conduct inspections of the state of readiness of 2321 civil protection structures in the territory of Transcarpathian region with the preparation of relevant acts and taking response measures in case of violations and inform the Commissioner about the results of the work done, indicating the number of inspected structures, acts drawn up, violations detected, response measures taken and deficiencies eliminated by the 25th day of each month
Western Interregional Department of the National Health Service of Ukraine:	
366.	to monitor the implementation of the terms of contracts for medical services under the programme of medical guarantees by health care institutions in Zakarpattia region in order to ensure the rights of

	children, pregnant women and women in labour to health care and medical assistance and to inform the Commissioner by 31.12.2026
ZAPORIZHZHIA REGION	
Zaporizhzhia regional state administration, regional military administration:	
367.	Introduce a unified algorithm for the settlement and change of temporary residence of IDPs within the region
368.	Ensure compliance with the requirements of the legislation in the field of social services and standards of inpatient care in the municipal institutions "Veselivskyi psychoneurological boarding school" of Zaporizhzhia regional council and "Zaporizhzhia children's boarding school" of Zaporizhzhia regional council
369.	Ensure systematic coordination and control over the state of readiness of civil protection facilities on the territory of Zaporizhzhia city territorial community, taking into account the results of monitoring visits
370.	Ensure proper and complete disclosure of public information by subordinate structural units at in accordance with the procedure established by law and ensure regular updating of the said data on official web resources
Zaporizhzhia city council:	
371.	Ensure control over the implementation of the Programme for Phased Reduction of Pollutant Emissions by Business Entities with the involvement of the public sector
372.	take urgent organisational and practical measures to bring civil protection structures into a condition suitable for safe stay of the population, taking into account the recommendations provided as a result of monitoring visits
373.	ensure proper and full disclosure of public information by subordinate structural units and municipal enterprises in accordance with the procedure established by law and ensure regular updating of the said data on official web resources
374.	To take measures to ensure that deputies of Zaporizhzhia city council are duly informed about the receipt of appeals addressed to them
IVANO-FRANKIVSK REGION	

Ivano-Frankivsk regional state administration, regional military administration:	
375.	when processing appeals from visually impaired persons, it is mandatory to take into account the method of communication indicated by them, as required by the Law of Ukraine "On Citizens' Appeals"
376.	Ensure systematic updating and unification of data on the fund of civil protection structures with simultaneous control of their actual condition, accessibility and compliance with the requirements of the legislation and the State Building Code
377.	Ensure constructive interaction between the authorised authorities and non-governmental providers of residential social services who need advisory assistance on the application of the legal framework governing the activities of social service providers, assistance in staff development, state support to ensure the functioning of private institutions in accordance with the requirements of the law
378.	Ensure systematic measures to raise legal awareness of social service providers and trainings for social service providers, including non-state-owned ones
Local self-government bodies to ensure:	
379.	Staffing of children's services in accordance with the normative staffing level, taking into account the number of children in the community
380.	The organisational and legal status of children's services in accordance with the requirements of the legislation, in particular to ensure the establishment and functioning of children's services as legal entities under public law
381.	Ensure accessibility of the educational environment for children with disabilities, in particular by providing for and allocating targeted funds for the adaptation of sanitary and hygienic facilities in educational institutions, arrangement of ramps and other elements of barrier-free access in accordance with the principles of universal design and the requirements of current legislation
382.	Eliminate dangerous objects on the territories of educational institutions (unfinished construction, repair work without fencing), with the obligatory installation of warning signs and restriction of access for children in order to realise the right to life and safety
To the Ivano-Frankivsk regional territorial centre for recruitment and social support (RTCS and SP) to ensure:	
383.	Conduct trainings for employees involved in the conscription of citizens for military service during mobilisation for a special period on

	legal, ethical and medical aspects of working with persons liable for military service who are HIV-positive, including with the involvement of experts from NGOs. Prevent the seizure of antiretroviral drugs from HIV-positive mobilised persons
384.	To develop an algorithm for prompt verification of citizenship as part of mobilisation activities of foreign citizens and stateless persons
Western Interregional Department for the Execution of Criminal Sentences:	
385.	To take measures to prevent the SIZO staff of Ivano-Frankivsk region from delaying the release of accused persons from custody after bail has been posted, provided that there is a certificate from the SJA in Ivano-Frankivsk region confirming that the bail amount has been deposited in the court's deposit account
To the Main Department of the National Police in Ivano-Frankivsk region to take measures to:	
386.	Arrange rooms for conducting investigative actions in the territorial police units in accordance with the requirements set out in the relevant departmental regulations and resume its operation. Ensure that interviews with citizens and procedural actions are carried out exclusively in rooms for conducting investigative actions
387.	To arrange a separate room for confidential meetings of detainees with defence counsels (lawyers) in accordance with established standards
388.	restore the functioning of rooms for detainees in police stations, provided that they are equipped in accordance with established norms and standards
KYIV CITY AND KYIV REGION	
The territorial department of the State Judicial Administration of Ukraine in the city of Kyiv and Kyiv region:	
389.	Ensure compliance with the requirements of DBN B.2.2-26:2010 and the Instruction on the organisation of escorting and holding in courts of accused (defendants) convicted at the request of courts, approved by the joint order of the Ministry of Internal Affairs of Ukraine, the Ministry of Justice of Ukraine, the Supreme Court of Ukraine, the High Specialised Court of Ukraine for Civil and Criminal Cases, the State Judicial Administration of Ukraine, the Prosecutor General's Office of Ukraine of 26.05.2015 No. 613/785/5/30/29/67/68, by equipping

	- cells for the accused (defendants), convicts with an area of not less than 4 m² at the rate of three cells per courtroom for consideration of criminal cases - sanitary facilities for accused (defendants) and convicts; - isolated routes for conveying accused (defendants) and convicts to courtrooms
390.	Ensure the arrangement of simple shelters in court premises for all categories of visitors, including defendants
391.	bring the entrance groups and interior premises of courts in line with the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures"
The Main Department of the National Police in Kyiv region:	
392.	Ensure compliance with the 90-day storage period for video surveillance system recordings in temporary detention centres
393.	To work on the issue of arranging simple shelters in temporary detention centres
The Main Department of the National Social Service in Kyiv and Kyiv region:	
394.	To carry out state supervision (control) over compliance with the requirements of the legislation in the field of child protection, in particular in the services for children and in the entities providing social services to families and children (centres for the provision of social services, social services, territorial centres for social services (provision of social services) in the city of Kyiv and all territorial communities of Kyiv region
Kyiv regional state administration, regional military administration:	
395.	Ensure accessibility of institutions, including healthcare facilities, general secondary education, ICC, residential institutions, geriatric boarding houses and children's institutions for people with reduced mobility by conducting an audit of architectural accessibility of facilities
396.	To approve an action plan with deadlines and responsible persons for the arrangement of unimpeded access facilities (in particular, ramps and lifts)
397.	To work out the issue of ensuring universal design of sanitary facilities
398.	Calculate and provide for the costs of implementing these measures

399.	Ensure coordination of the activities of services for children in the territorial communities of the region, in particular, regarding the status of an orphan or a child deprived of parental care, as well as registration of children who may be adopted
400.	Ensure that the personal files of orphans, children deprived of parental care and children in difficult life circumstances are formed and brought in line with the requirements of the current legislation
401.	To facilitate the placement of children on full state support in family-based care
402.	to conduct activities (education, trainings) to improve the skills of employees of services in territorial communities
The Main Department of the State Emergency Service of Ukraine in Kyiv Oblast:	
403.	Strengthen control over the state of maintenance and readiness of civil protection facilities, in particular in healthcare, education and enterprises with massive presence of people, with response measures in case of violations
Balance holders of the objects of the protective structures fund:	
404.	Ensure that protective structures are brought into a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Structures, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018
KIROVOHRAD OBLAST	
Kirovohrad Oblast Council:	
405.	To approve the regional Programme for Ensuring Architectural Accessibility of State-Owned Facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main provisions"
406.	Ensure full implementation of the Commissioner's recommendations on deinstitutionalisation of children from communal institutions of round-the-clock stay by developing and funding a regional programme for the development of family-based care, creating

	a network of foster families, ensuring housing and property rights of orphans and children deprived of parental care
Kirovohrad Regional State Administration, Regional Military Administration:	
407.	to develop and submit for approval to the Kirovohrad Regional Council the Regional Programme for Ensuring Architectural Accessibility of State-Owned Facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate educational, healthcare and social protection institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of the State Building Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main provisions"
408.	Strengthen the work on ensuring the readiness and accessibility of civil protection shelters in subordinate institutions by conducting a comprehensive audit of existing protective structures, developing plans for their modernisation and ensuring barrier-free access for persons with disabilities and low-mobility groups, in particular in educational, healthcare and social service institutions
409.	Conduct monitoring observations on the implementation of the requirements of the State Construction Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Basic Provisions" in places of temporary residence of internally displaced persons in terms of barrier-free access for persons with limited mobility and persons with disabilities and take measures to implement them
410.	Ensure the implementation of the Resolution of the Cabinet of Ministers of Ukraine No. 261 of 11 March 2022 "On Approval of the Procedure and Conditions for Providing Compensation for Consumed Utilities during the Accommodation of Internally Displaced Persons in Buildings (Premises) of State, Communal and Private Property during Martial Law" in places of temporary residence of internally displaced persons
Local self-government bodies:	
411.	Ensure a comprehensive audit of the architectural accessibility of all community facilities with subsequent elimination of all identified problematic issues, with the prioritisation of facilities, specific deadlines, responsible persons and sources of funding with the possibility of attracting international technical assistance

412.	To approve programmes for ensuring architectural accessibility of municipal facilities for 2026-2028 with the allocation of targeted budget funds for the installation of ramps, lifts, tactile elements, arrangement of universal sanitary facilities and ensuring unimpeded access to buildings of territorial centres for the provision of administrative services, healthcare, education, culture and social protection institutions in accordance with the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures"
413.	align the number of employees of services for children in territorial communities with the number of children in the community in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children", fill all vacant positions with qualified specialists to increase the institutional capacity of the services
414.	Ensure that the information specified by the Law of Ukraine "On Access to Public Information" is published on the official websites of territorial communities, taking into account the Methodological Recommendations on the content of official websites of executive authorities and local self-government bodies developed by the Ukrainian Parliament Commissioner for Human Rights and the Ministry of Culture and Strategic Communications of Ukraine
415.	Take an inventory of existing civil protection facilities (shelters, radiation shelters, simple shelters (basements, rooms, etc.)
416.	Based on the results of the inventory, develop a Plan indicating practical approaches to eliminate violations of architectural accessibility of civil protection structures
417.	Bring the technical condition of civil protection facilities into a satisfactory state, eliminate problems with: ventilation, lighting, high humidity and clutter. Provide drinking water and first aid kits.
418.	Improve the living conditions of internally displaced persons in places of temporary residence by carrying out major and minor repairs of residential premises and common areas in accordance with the Procedure for the functioning of places of temporary residence of IDPs (CMU Resolution No. 930 of 01.09.2023)
419.	Provide temporary accommodation for internally displaced persons in accordance with the principle of universal design, equipping them with the necessary household appliances and furniture, taking into account the recommendations of the Ombudsman's Office in Kirovohrad region, with maximum involvement of support from international donors
Territorial Department of the State Judicial Administration of Ukraine in Kirovohrad region:	

420.	Ensure compliance with the requirements of clause 6.5.2 of the State Building Standards of Ukraine B.2.2-26:2010 "Buildings and structures. Courts", approved by the order of the Ministry of Regional Development and Construction of Ukraine of 17.05.2010 No. 175, namely: to equip court premises with rooms for the work of counsel with the accused, defendants (convicts)
421.	Ensure the implementation of paragraphs 6.1.8 and 11.5 of the State Construction Standards of Ukraine B.2.2-40:2018 "Inclusiveness of Buildings and Structures. Main Provisions", approved by the Order of the Ministry of Regional Development, Construction, Housing and Communal Services of Ukraine No. 327 of 30.11.2018, namely: to equip court premises with ramps, handrails, lifts, to resolve the issue of high thresholds, narrow doorways
Children's services of village, town and city councils in Kirovohrad region:	
422.	Ensure the realisation of property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities
423.	Introduce systematic control over the preservation of the right of orphans and children deprived of parental care to housing
424.	Ensure constant monitoring of the establishment of guardianship over the property of orphans and children deprived of parental care
425.	Ensure proper maintenance and systematic implementation of individual social protection plans for each child in difficult life circumstances, orphan, child deprived of parental care, with mandatory monitoring of the achievement of the set goals and involvement of interdisciplinary teams for comprehensive support of the child
426.	To intensify work on the creation and development of family-based forms of upbringing in each community of the region through the formation of a network of foster families, adoptive families, guardians, to introduce systematic informing the population about the possibilities of family-based upbringing, organising training and support for foster parents to ensure the right of every child to be brought up in a family environment
Centres for the provision of social services of village, town and city councils in Kirovohrad region:	
427.	Ensure systematic execution of contracts for the provision of social services with foster families and families under social support
428.	Ensure control over the adoption of decisions on social support for families (individuals) in difficult life circumstances

429.	ensure the implementation of the creation and functioning of a mobile team of social and psychological assistance to victims of domestic violence and/or gender-based violence in accordance with the Model Regulation on the Mobile Team of Social and Psychological Assistance to Victims of Domestic Violence and/or Gender-Based Violence, approved by the Cabinet of Ministers of Ukraine on 22 August 2018, No. 654
LVIV REGION	
Lviv Regional Council:	
430.	Ensure accessibility of municipal facilities and institutions for persons with disabilities and other low-mobility groups by approving the regional programme for ensuring architectural accessibility for 2026-2028 with the allocation of budget funds for the installation of ramps, lifts, universal sanitary facilities, tactile elements and ensuring unimpeded access to all municipal property
431.	introduce standards of preventive monitoring of human rights observance in all municipal social protection institutions of regional subordination through the creation of internal control mechanisms, in accordance with the methodological recommendations of the Ombudsperson's Secretariat on the implementation of the functions of the national preventive mechanism and ensuring systematic monitoring of the implementation of individual social protection plans
432.	Continue to support the increase in salaries of social workers in municipal social protection institutions of the region by allocating additional funding to ensure competitive salaries, which will help to attract and retain qualified personnel in the field of social protection
433.	To develop a regional programme for the development of family-based forms of care, creation of a network of foster families, and ensuring the housing and property rights of orphans
Lviv regional state administration, regional military administration:	
434.	To create a regional programme for ensuring architectural accessibility of state-owned facilities for 2026-2028, providing for targeted funding for the modernisation of buildings of subordinate educational, healthcare and social protection institutions to ensure unimpeded access for persons with disabilities and low-mobility groups in accordance with the requirements of DBN B.2.2-40:2018 "Inclusiveness of Buildings and Structures"
435.	Continue to improve the conditions of persons in the subordinate institutional institutions of social protection and healthcare (boarding

	schools, geriatric boarding houses, orphanages, psychoneurological boarding schools), taking into account the security situation, legal requirements, as well as the Standards for Social Services, DBN B.2.2-40:2018, and the recommendations of the UN Committee against Torture, and the relevant recommendations of the Commissioner, provided as a result of previous monitoring visits within the national preventive mechanism
436.	To approve the regional Standard for a Safe Educational Environment for all educational institutions of regional subordination as a tool for unified implementation of the requirements of current legislation, in particular the Procedure for Responding to Cases of Violence approved by the Cabinet of Ministers of Ukraine on 19 November 2025, No. 1513, and the Procedure for Responding to Cases of Bullying (Harassment) approved by the Order of the Ministry of Education and Science of Ukraine of 28 December 2019, No. 1646
437.	Strengthen efforts to ensure the readiness and accessibility of civil protection shelters in subordinate institutions by conducting a comprehensive audit of existing protective structures, developing plans for their modernisation and ensuring barrier-free access for persons with disabilities and low-mobility groups, in particular in educational, healthcare and social service institutions
438.	Bring the official website of the Lviv regional military administration in full compliance with the requirements of Ukrainian legislation on access to public information
To the local self-government bodies of Lviv region:	
439.	approve programmes for ensuring architectural accessibility of municipal facilities for 2026-2028 with the allocation of targeted budget funds for the installation of ramps, lifts, tactile elements, arrangement of universal sanitary facilities and ensuring unimpeded access to buildings of territorial centres for the provision of administrative services, healthcare, education, culture and social protection institutions in accordance with the requirements of the State Building Code B.2.2-40:2018 "Inclusiveness of Buildings and Structures"
440.	Ensure a comprehensive audit of the architectural accessibility of all community facilities with the mandatory use of the Accessibility Assessment Questionnaire (71 criteria) developed by the Commissioner's Office, followed by approval of the Barrier Removal Plan with the prioritisation of facilities, specific deadlines, responsible persons and sources of funding with the possibility of attracting international technical assistance
441.	To bring the number of employees of the services for children of territorial communities in line with the number of children in the community in accordance with the requirements of Article 4 of the Law

	of Ukraine "On Bodies and Services for Children and Special Institutions for Children", to ensure that the services are granted the status of a legal entity and to fill all vacant positions with qualified specialists to increase the institutional capacity of the services
442.	Bring official websites of territorial communities in full compliance with the requirements of the Law of Ukraine "On Access to Public Information"
443.	Adopt standard regulations on preventing and combating bullying, sexual harassment and violence in municipal educational institutions, defining clear detection procedures, response algorithms, victim support mechanisms, appointing responsible persons and introducing mandatory annual training for teaching staff in accordance with the requirements of the law
444.	Ensure the readiness for use and full architectural accessibility of civilian protection shelters by conducting an inventory of existing protective structures, identifying the need for their modernisation, developing and funding a plan to ensure barrier-free access to shelters for persons with disabilities and low-mobility groups, especially in educational, healthcare and social services institutions
445.	Improve the living conditions of internally displaced persons in places of temporary residence by carrying out major and minor repairs of residential premises and common areas in accordance with the Procedure for the functioning of places of temporary residence of IDPs (CMU Resolution No. 930 of 01.09.2023)
Services for children of territorial communities in Lviv region:	
446.	Ensure the realisation of the property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities, systematic monitoring of the right to use housing, establishing custody of the child's property and taking appropriate measures to assign alimony, collect it and monitor its intended use
447.	Ensure proper maintenance and systematic implementation of individual social protection plans for each child in difficult life circumstances, orphan, child deprived of parental care, with mandatory monitoring of the achievement of the set goals and involvement of interdisciplinary teams for comprehensive support of the child
448.	to intensify work on the creation and development of family-based forms of upbringing in each community of the region through the formation of a network of foster families, adoptive families, guardians, systematic informing the population about the possibilities of family upbringing, organising training and support for foster parents to ensure the right of every child to be brought up in a family environment

449.	Strengthen control over the protection of personal data of children registered by introducing clear internal procedures for processing personal data in accordance with the requirements of the Law of Ukraine "On Personal Data Protection", conducting staff training and systematic audits of compliance with the law
Territorial bodies of central executive authorities in Lviv region (Main Department of the State Migration Service in Lviv region, Main Department of the Pension Fund of Ukraine in Lviv region, Employment Centres, Territorial Department of the State Judicial Administration of Ukraine, Western Interregional Department of the State Labour Service, Western Interregional Department of Justice, Main Department of the State Geocadastre in Lviv region, Main Department of the State Tax Service in Lviv region, Main Department of the State Food and Beverage Service in Lviv region).	
450.	Ensure full architectural accessibility of the premises of all territorial bodies and subdivisions for persons with disabilities and low-mobility groups by conducting a comprehensive accessibility audit, approving modernisation plans with the definition of terms and sources of funding, installing ramps in accordance with the requirements of DBN B.2.2-40:2018, arranging elevators in multi-storey buildings, creating accessible sanitary facilities, installing tactile elements for visually impaired persons, allocating parking spaces for persons with disabilities.
451.	Strictly comply with the deadlines for consideration of applications, appeals and requests of citizens provided for by the legislation of Ukraine by optimising internal procedures, introducing an electronic filing system, expanding the possibilities of extraterritorial service, ensuring a sufficient number of qualified employees and implementing systems for monitoring compliance with deadlines to prevent violations of the rights of citizens to receive timely services
452.	Bring official websites in full compliance with the requirements of the Law of Ukraine "On Access to Public Information"
MYKOLAIV REGION	
Mykolaiv regional state administration, regional military administration:	
453.	Ensure that regional subordination institutions providing services to children comply with safety standards, sanitary and hygienic requirements, and requirements for the organisation of medical care and nutrition
454.	to strengthen control over the measures taken by the owners/balance holders to bring civil protection facilities in line with

	the Requirements for the maintenance and operation of civil protection facilities, approved by the Order of the Ministry of Internal Affairs of Ukraine of 09 July 2018 No. 579
455.	Ensure architectural accessibility for persons with disabilities and other low-mobility groups to institutions and civil protection facilities of municipal and state ownership, primarily to healthcare, education and social facilities
456.	Ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, in particular those operating in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930, with the possibility of further confirmation of compliance with the established standards
457.	Ensure that the rights of residents in private and communal nursing homes for the elderly are respected by properly implementing legislation on social protection, medical care, creating a barrier-free environment and guaranteeing the right to privacy and respect for dignity, with mechanisms to prevent repeated violations
458.	Ensure systematic interagency control over the observance of the rights of servicemen, veterans and members of their families, in particular with regard to social benefits, access to various types of services and proper performance of their duties by specialists supporting war veterans and demobilised persons in the communities of the region
Local self-government bodies:	
459.	Ensure proper arrangement of protective structures in pre-school and general secondary education institutions to ensure the safety of participants in the educational process
460.	Ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans
461.	To intensify work on the creation of family-based forms of upbringing in each territorial community as a priority model of child protection
462.	Ensure barrier-free and accessible premises in territorial community institutions for people with disabilities and low-mobility groups by approving and implementing relevant action plans and identifying responsible persons
463.	Strengthen control over the technical condition of the premises of temporary accommodation centres (TACs) for internally displaced persons, as well as ensure that their right to safe, proper and decent living conditions is respected in accordance with established standards

ODESA REGION	
Odesa regional state administration, regional military administration:	
464.	Provide targeted funding for the overhaul of protective structures, with particular attention to ventilation systems, plumbing equipment and barrier-free access for people with limited mobility
465.	Eliminate violations in the organisation of meals in educational institutions, including the development of a dietary menu for children with special needs
466.	Ensure full compliance with the requirements of the Laws of Ukraine "On Citizens' Appeals" and "On Access to Public Information" regarding the publication of information on official websites
467.	ensure compliance with the minimum requirements at the ICC in accordance with the provisions of the CMU Resolution "Some Issues of Functioning of Temporary Accommodation Places for Internally Displaced Persons" of 1 September 2023 No. 930
468.	Ensure that personal files of orphans and children deprived of parental care are filled in accordance with the Procedure for the implementation of activities related to the protection of children's rights by guardianship and custody bodies, approved by CMU Resolution No. 866 of 24.09.2008
Local self-government bodies:	
469.	To publish on the websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
470.	to bring the staffing of the services for children of the territorial communities of Odesa oblast in line with the number of children in the territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"
471.	Ensure personal receptions of citizens, as well as participation of citizens in the consideration of appeals, taking into account the conditions of martial law (personal reception by video conference in safe spaces)
472.	Provide targeted funding for the overhaul of protective structures, paying particular attention to ventilation systems, plumbing equipment and barrier-free access for people with limited mobility
Odesa Regional Territorial Centre for Recruitment and Social Support:	

473.	Conduct additional briefings with personnel on the inadmissibility of mobilising persons with deferred or disability status and ensure thorough verification of documents at the stage of conscription
474.	Establish a transparent algorithm of interaction with the families of prisoners of war and missing persons, ensuring timely provision of information and certificates on the progress of the search
475.	Ensure unimpeded access of lawyers and representatives of the free legal aid system to the premises of the TCC and JIT
476.	Ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the time limits established by law
477.	Ensure proper organisation of office work and correspondence accounting
POLTAVA REGION	
Poltava Regional State Administration, Regional Military Administration:	
478.	Ensure periodic (at least once a year) training of employees of educational institutions on how to act in cases of violence and cruelty against children in accordance with the requirements of the Procedure for responding to cases of violence and cruelty against children, approved by the Cabinet of Ministers of Ukraine of 19.11.2025 No. 1513
479.	Ensure that educational institutions comply with safety standards, sanitary and hygienic requirements and requirements for the organisation of medical care and nutrition
480.	Together with local self-government bodies, international and national non-governmental organisations (upon agreement), within their powers, ensure compliance with minimum safety standards and proper condition of premises in places of temporary residence of internally displaced persons, in particular, in dormitories of educational institutions, by bringing living conditions in line with the requirements set out in the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930, with the possibility of further confirmation of compliance with the established standards
Local self-government bodies:	
481.	Bring the number of employees of children's services in line with the requirements of Article 4 of the Law of Ukraine "On Bodies and

	Services for Children and Special Institutions for Children" and of the Resolution of the Cabinet of Ministers of Ukraine No. 905 of 08.10.2008 "On Approval of the Procedure for the Protection of Personal Data"
482.	Ensure control over the activities of children's services in assessing the needs of a child in difficult life circumstances, a child left without parental care, an orphan, or a child deprived of parental care
483.	Ensure an appropriate response to cases of violence and cruelty against children in educational institutions in accordance with the Procedure for Responding to Cases of Violence and Cruelty against Children, approved by the Resolution of the Cabinet of Ministers of Ukraine No. 1513 of 19.11.2025
484.	To equip protective structures in preschool and secondary education institutions to ensure the safety of participants in the educational process during training
485.	to bring protective structures into a state of readiness for their intended use in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities, approved by Order of the Ministry of Internal Affairs of Ukraine No. 579 dated 09.07.2018
486.	Post on the websites information on the procedure for exercising the right to appeal in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals"
487.	Ensure that information managers publish on their websites the information required by the Law of Ukraine "On Access to Public Information"
Services for Children of local self-government bodies of Poltava region:	
488.	Ensure proper documentation, formation of personal files of children
489.	Ensure effective cooperation with social service centres/social service centres and interagency cooperation with actors involved in preventing and combating domestic violence in order to prevent violations of the rights of children and their families to receive adequate social protection, ensure their social support and basic social services
Poltava Regional Centre for Recruitment and Social Support:	
490.	to ensure control over the implementation of notification and conscription measures by the united district/city territorial centres of recruitment and social support, in order to respect the rights of citizens and prevent a formal approach to mobilisation measures

RIVNE REGION	
Rivne regional state administration, regional military administration:	
491.	To take measures aimed at improving the living conditions of internally displaced persons in places of temporary residence in Rivne region, in accordance with the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930 "Some issues of functioning of places of temporary residence of internally displaced persons"
492.	Take measures to increase the number of temporary accommodation places for internally displaced persons
493.	Ensure accessibility of municipal and state-owned institutions for persons with disabilities
494.	Increase expenditures for the maintenance of social protection institutions to create appropriate conditions for the stay of wards/inmates
To local self-government bodies:	
495.	Ensure the publication on official websites of the information provided for by the Law of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
496.	Ensure that information on the procedure for exercising the right of citizens to appeal is published in an accessible format on the official website and in the premises of the institution. Provide an opportunity to submit oral appeals via the telephone network with mandatory recording of such appeals
497.	To publish on the official website information of public interest, including information on the procedure for submitting requests for information, the procedure for appealing decisions, actions or inaction, information on vacancies and competition conditions, as well as places where the necessary forms and blanks can be obtained
498.	Ensure the arrangement and refurbishment of shelters on the territory of communities for the civilian population, in particular on the territory of healthcare, education and social protection institutions, exercise constant control over the free access of citizens to them
499.	Ensure proper organisation and control over the implementation of measures to prevent and combat bullying (harassment) in general secondary education institutions, in particular to intensify the work of commissions to review cases of bullying; to ensure proper maintenance of logs of appeals and reports of conflicts and manifestations of bullying;

	create conditions in educational institutions for students to report violations of their rights in a safe and confidential manner; support the development of student self-government tools.
500.	take measures to ensure appropriate conditions for the work of practical psychologists and social educators in general secondary education institutions, in particular provide for separate, properly equipped premises for individual and group consultations in compliance with the principle of confidentiality; to facilitate the provision of specialists with the necessary methodological materials, diagnostic tools and opportunities for professional development; facilitate the organisation of thematic classes, trainings and educational activities for students in educational institutions aimed at developing emotional competence, non-violent communication and mediation skills; to ensure control over the prevention of cases of provision of medical services in educational institutions without a relevant licence
The Main Department of the National Police in Rivne region:	
501.	Ensure compliance with the standards of humane treatment of detainees, in particular by bringing the premises for detainees in line with the requirements of national legislation and international standards and their actual functioning, as well as by arranging and ensuring accessibility of sanitary facilities for persons with disabilities and low-mobility groups
The Main Department of the State Emergency Service of Ukraine in Rivne region:	
502.	Organise and conduct inspections of the readiness of civil protection facilities in the region. During the inspections, ensure accounting of the following: number of inspected facilities, acts drawn up, of violations detected, response measures taken, number and share of violations eliminated
Rivne Regional Territorial Centre for Recruitment and Social Support:	
503.	Ensure acceptance, registration and timely consideration of citizens' appeals/inquiries in all structural units of the regional TCC and SP
504.	to conduct additional briefings and training of employees on the requirements of the law, standards of lawful behaviour and proper

	communication with citizens during mobilisation activities and military registration
505.	Strengthen internal control over the activities of employees by mandatory in-house inspections for each fact of possible misconduct; bringing the perpetrators to disciplinary responsibility in accordance with the procedure established by law
The territorial department of the State Judicial Administration of Ukraine in Rivne region and the courts of Rivne region:	
506.	Ensure the elimination of systemic violations in courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated convoy routes and arranging rooms for confidential communication with lawyers
507.	Strengthen logistical support to ensure respect for human rights, in particular the rights to dignity, security, accessibility and effective defence
SUMY REGION	
Sumy regional state administration, regional military administration:	
508.	To bring the places of temporary residence on the territory of Sumy region in line with the minimum standards for the functioning of temporary residence places provided for by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930
509.	Provide additional funding to compensate the balance holders of the TACs for the costs of housing and communal services
510.	To equip institutional care facilities with shelters
Sumy Regional Territorial Centre for Recruitment and Social Support:	
511.	to provide each territorial centre for recruitment and social support, as well as their territorially separate structural subdivisions, with a separate isolated room for confidential communication between lawyers and persons brought for military medical examination and military registration procedures
512.	To ensure that advocates have access to the premises of the recruitment and social support centres to provide legal aid to their clients, subject to security restrictions and if there are grounds established by law

The Main Department of the National Police in Sumy region:	
513.	To conduct an audit of the accessibility of the premises of territorial police units and, based on its results, take measures to eliminate the identified shortcomings
To local self-government bodies:	
514.	To publish on the websites of territorial communities the information provided for by the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
515.	To organise and conduct training for responsible employees of local self-government bodies and subordinate municipal enterprises on compliance with the requirements of the legislation on access to public information and on citizens' appeals
516.	Ensure timely detection, proper identification and registration of children in difficult life circumstances, as well as organisation of their further social support in accordance with the requirements of the law
517.	Ensure the continuity of children's services in the context of evacuation, in particular by properly documenting the relocation of institutions, organising the preservation of official documentation (including its digitisation and backup) and establishing interagency cooperation to respond to the needs of children and families in a timely manner
518.	Ensure timely and proper consideration of applications, complaints and proposals in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals"
519.	When considering requests for information, to be guided by the requirements of the Law of Ukraine "On Access to Public Information", to avoid unreasonable refusals with reference to restrictions on the constitutional rights of citizens in connection with the legal regime of martial law
520.	keep the content of official websites and social media pages up to date, including contact information, working hours and reception of citizens
TERNOPIL REGION	
Ternopil regional state administration, regional military administration:	
521.	To bring the living conditions of internally displaced persons in temporary accommodation in line with the standards set out in the Procedure for the functioning of temporary accommodation for internally displaced persons, approved by the Cabinet of Ministers of

	Ukraine of 01.09.2023 No. 930 "Some issues of functioning of temporary accommodation for internally displaced persons"
522.	Provide organisational and methodological assistance to the services for children of territorial communities on the formation and bringing personal files of orphans and children deprived of parental care in line with the requirements of the current legislation
523	Ensure the arrangement and refurbishment of shelters on the territory of the region for the civilian population, as well as continuously monitor the free access of citizens to them and their readiness for use
Local self-government bodies:	
524.	To publish on the official websites of the territorial communities of the region the information provided for by the laws of Ukraine "On access to public information" (in particular, Article 15) and "On citizens' appeals" (in particular, Articles 5, 22)
525.	Ensure personal receptions of citizens
526.	take measures aimed at improving living conditions in the ICC communities in accordance with the norms defined by the Procedure for the functioning of places of temporary residence of internally displaced persons, approved by the Resolution of the Cabinet of Ministers of Ukraine of 01.09.2023 No. 930
527.	Ensure the realisation of property rights of orphans and children deprived of parental care by registering citizens who, in accordance with the law, need to improve their living conditions and by keeping proper apartment records
528.	Ensure the arrangement and refurbishment of shelters for the civilian population, and exercise constant control over the free access of citizens to them and their readiness for use
Services for children of territorial communities, regional and district military administrations:	
529.	Ensure the realisation of the property and housing rights of orphans and children deprived of parental care through timely registration with the housing authorities, preservation of the right to use housing, establishment of guardianship over the child's property, and taking appropriate measures to control the award and recovery of alimony
530.	Ensure that personal files are kept in order in accordance with the Procedure for keeping personal files of orphans and children deprived of parental care, approved by the Order of the Ministry of Ukraine for Family, Youth and Sports of 18.11.2008 No. 459

531.	Develop, implement, systematically review and adjust individual social protection plans, ensuring that the planned measures are in the best interests of the child, as well as individual plans for the provision of social services, including plans for social support of the child's family
532.	Organise the implementation by the guardianship and custody authorities of the Procedure for granting the status of a child affected by hostilities and armed conflicts, approved by the Cabinet of Ministers of Ukraine on 05.04.2017 No. 268
Ternopil Regional Territorial Centre for Recruitment and Social Support:	
533.	Ensure acceptance, registration and timely consideration of appeals and inquiries of citizens in all structural subdivisions of the TCC and SP of the region
534.	to take measures to prevent human rights violations during the conscription of citizens for military service in the process of mobilisation for a special period
To the Main Department of the State Emergency Service of Ukraine in Ternopil region:	
535.	Within the limits of the powers granted, to ensure compliance with the requirements of the Order of the Ministry of Internal Affairs of Ukraine of 09.07.2018 No. 579 during the assessment of objects (buildings, structures, premises) and to provide conclusions on the possibility of their use as the simplest shelters for the population
KHARKIV REGION	
Kharkiv regional state administration, regional military administration:	
536.	Ensure coordination of activities of local self-government bodies, balance holders and other responsible entities to bring all TACs located in the region in line with the requirements of the Procedure for the functioning of places of temporary residence of internally displaced persons
537.	To take measures to eliminate systemic violations identified during monitoring visits, in particular in terms of ensuring accessibility of premises for people with reduced mobility
538.	To work on the issue of redistribution of evacuees between social protection institutions, taking into account their profile, design capacity and actual capacities

539.	Ensure strict compliance with the requirements of the legislation on access to public information and the right to appeal, including in the context of the legal regime of martial law
540.	ensure quarterly inspections of the technical condition of the premises of temporary accommodation facilities and timely elimination of identified deficiencies
541.	Take measures to provide alternative sources of electricity, heat and water supply to places of temporary residence
Local self-government bodies of territorial communities, institutions, enterprises, organisations, district, city, town and village military administrations under their control:	
542.	Promote awareness among IDPs of available social services, support programmes and mechanisms for protecting their rights
543.	Ensure the completeness, relevance and timely publication on official websites of information on decisions, regulations, contact details, methods of submitting appeals and requests, as well as the procedure for personal reception of citizens
544.	To appoint an official responsible for internal control over the disclosure of information and publication of reports on consideration of requests for public information
545.	to mark the locations of the objects of the fund of protective structures on the territory of territorial communities, as well as to place signs of traffic to them
546.	to ensure free access to the premises of the objects of the fund of protective structures, the possibility of using them by persons with disabilities and other low-mobility groups of the population; to equip the objects of the fund of protective structures on the territory of territorial communities with communication and warning systems, power supply and ventilation
547.	Place fire extinguishing equipment, emergency tools, drinking and industrial water, food supplies, primary healthcare facilities, and sewage tanks in the simplest shelters on the territory of territorial communities
548.	Install communication and warning systems in the simplest shelters on the territory of territorial communities
549.	To match the number of staff of children's services with the number of children in territorial communities in accordance with the requirements of Article 4 of the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children" and Article 12 of the Law of Ukraine "On Ensuring Organisational and Legal Conditions for Social Protection of Orphans and Children Deprived of Parental Care"

550.	Ensure compliance with the requirements of DBN B.2.2-40:2018 "State Construction Norms. Inclusiveness of buildings and structures. Main provisions" in educational institutions
551.	Ensure funding for nutrition for children in healthcare facilities, taking into account the individual needs of each child and to ensure the right of the child to a standard of living sufficient for physical, intellectual and moral development, including adequate nutrition
552.	Ensure that educational institutions provide proper social and pedagogical patronage and psychological support for children
553.	Ensure the availability of specialists who have undergone appropriate training and implement programmes for perpetrators in each community
Services for children of territorial communities, regional/district/city/township/village military administrations:	
554.	Continue to take measures to ensure the housing rights of orphans and children deprived of parental care through the registration of housing
555.	Ensure awareness-raising activities among the population, in particular on the procedure for identifying a child without parental care
Centres for the provision of social services, centres of social services in Kharkiv region:	
556.	To the regional centre for social services to analyse the needs of social service providers for additional training of social support specialists and, based on the results of such analysis, to ensure the organisation and conduct of relevant training events
557.	Ensure mandatory social support and participation in correctional programmes for parents of a child who, according to the assessment of the needs of the family or individual, is in difficult life circumstances and has experienced domestic violence, including for perpetrators of such violence or child abuse
Kharkiv Regional Territorial Centre for Recruitment and Social Support:	
558.	To strengthen internal control and preventive measures by conducting additional briefings with personnel, official inspections on each fact of possible violations of the procedure during the implementation of mobilisation measures
559.	Introduce quarterly monitoring of the status of consideration of appeals and requests for information, in particular through internal inspections

Territorial recruitment and social support centres:	
560.	to ensure that officials of the recruitment centres strictly comply with the requirements of the current legislation of Ukraine during the implementation of mobilisation measures, including in terms of preventing the abuse of power, use of physical force, psychological pressure and other unlawful actions against citizens
561.	Ensure timely and complete consideration of citizens' appeals, requests for information and response letters within the timeframe established by law
562.	Ensure proper organisation of office work and correspondence accounting
Territorial Department of the State Judicial Administration of Ukraine in Kharkiv Oblast and courts of Kharkiv Oblast:	
563.	Ensure the elimination of systemic violations in the courts by creating appropriate conditions for the detention of defendants and convicts, organising isolated convoy routes and arranging rooms for confidential communication with lawyers
564.	Strengthen logistical support to ensure respect for human rights, in particular the rights to dignity, security, accessibility and effective defence
To the National Police of Ukraine in Kharkiv region:	
565.	Ensure compliance with the standards of humane treatment of detainees, in particular by bringing the premises for detainees in line with the requirements of the Instruction on the organisation of the duty service of the bodies (units) of the National Police of Ukraine, as well as by arranging and ensuring accessibility of sanitary facilities for persons with disabilities and low-mobility groups
Privately owned institutions providing care services (nursing homes):	
566.	Ensure safe conditions of stay for clients by arranging shelters in accordance with the requirements of the law
567.	Guarantee the observance of the right to liberty and security of person of the wards, in particular by obtaining informed voluntary consent to stay in the institution and preventing unreasonable restrictions on freedom of movement
568.	Ensure the provision of social services in accordance with the individual needs of the wards, including by drawing up individual care

	plans, organising meaningful leisure activities and creating a barrier-free environment for persons with disabilities and people with reduced mobility
KHERSON REGION	
Kherson regional state administration, regional military administration:	
569.	to develop an algorithm for promptly granting the status of "child affected by hostilities" based on the fact of being under occupation, eliminating the requirement of unnecessary certificates of physical injuries
570.	Audit all modular and permanent shelters in the region for compliance with inclusivity standards and eliminate identified shortcomings
571.	Take urgent measures to fill the vacancies of social educators and psychologists in schools of Bilozerska, Chornobaivska and Vysokopilska communities
572.	To move away from the use of exclusively canteen products and develop mechanisms to return to hot meals in institutions where the educational process is ongoing
573.	Conduct an inventory of technical equipment (tablets/laptops) among vulnerable children and provide them with devices for distance learning
574.	Ensure proper support and prompt transfer of documentation by the members of the MEC commission on persons declared unfit for service to military units and TCCs and JTFs in order to avoid delays in their dismissal
Local self-government bodies and local military administrations:	
575.	To equip the entrance groups of shelters and educational institutions with ramps and other accessibility elements in accordance with the DBN norms
576.	In communities with unstable communication, introduce alternative methods of notification of social payments, evacuation and registration for the eRestoration programme
KHMELNYTSKYI REGION	
Khmelnyskyi regional state administration, regional military administration:	

577.	To ensure systematic interagency control over the observance of the rights of servicemen, veterans and members of their families, in particular with regard to social benefits, access to various types of services and proper performance of their duties by specialists supporting war veterans and demobilised persons in the communities of the region
578.	Ensure that regional municipal institutions provide barrier-free movement for persons with disabilities and low-mobility groups, as well as barrier-free access to and use of sanitation and hygiene facilities or their reasonable adaptation
579.	Ensure that the living conditions of internally displaced persons are brought in line with the minimum requirements of the ICC Procedure, approved by the Cabinet of Ministers of Ukraine on 01.09.2023 No. 930
580.	Ensure that owners/balance holders take measures to bring civil protection facilities in line with the Requirements for the maintenance and operation of civil protection facilities, approved by the Order of the Ministry of Internal Affairs of Ukraine No. 579 of 09 July 2018
Local self-government bodies :	
581.	Ensure barrier-free and accessible premises in the territorial community's institutions/agencies for people with disabilities and low-mobility groups by taking effective measures (approval and implementation of relevant action plans, identification of responsible persons)
582.	Ensure publication on official websites of the information provided for by the Law of Ukraine "On Access to Public Information" and exercise of the right to submit an oral appeal, in particular, by using the contact phone number published on the official website
583.	Ensure control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans
584.	To intensify work on the creation of family-based forms of upbringing in each territorial community as a priority model for the protection of children's rights
585.	Ensure that places of temporary residence of IDPs are brought in line with the established standards and that a fund of housing for temporary residence is formed, including proper accounting of needs
586.	Implement internal procedures for organising work with personal data and controlling their protection, and identify a responsible person to organise work related to the protection of personal data during their processing
CHERKASY REGION	

Cherkasy Regional State Administration, Regional Military Administration:	
587.	To equip/refurbish shelters on the territory of the region for the civilian population and to exercise constant control over the free access of citizens to them
588.	Ensure architectural accessibility of municipal and state-owned institutions for persons with disabilities
589.	Ensure the publication of public information on official websites and strengthen control over compliance with the requirements of the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
Local self-government bodies:	
590.	Ensure the publication of public information on the official websites of territorial communities and strengthen control over compliance with the requirements of the Laws of Ukraine "On Access to Public Information" and "On Citizens' Appeals"
591.	Ensure personal receptions of citizens, as well as participation of citizens in the consideration of appeals, taking into account the conditions of martial law (personal reception by video conference, in safe spaces, etc.)
592.	Provide places of temporary residence (accommodation) with the necessary supply of solid fuel before the beginning of the heating period
593.	strengthen control over compliance with the Law of Ukraine "On Personal Data Protection" on the official websites of educational institutions
594.	to strengthen control over compliance with the Law of Ukraine "On Medicines" and the Rules for Utilisation and Destruction of Medicines, approved by the Order of the Ministry of Health of Ukraine of 24 April 2015 No. 242, in educational institutions
CHERNIVTSI REGION	
Chernivtsi regional state administration, regional military administration:	
595.	Ensure compliance with the minimum requirements in the ICCs in accordance with the provisions of the CMU Resolution "Some issues of functioning of places of temporary residence of internally displaced persons" of 1 September 2023, No. 930

596.	Analyse IDPs living in the ICCs by category. Provide social support to people with limited mobility, persons with disabilities and single persons
597.	Ensure full implementation of the recommendations provided as a result of monitoring visits to the MCC in 2023-2025
598.	Hold an interagency meeting with actors involved in healthcare, education, children's services, and law enforcement agencies to strengthen coordinated action to properly respond to cases of child abuse and domestic violence
599.	To ensure that officials hold personal receptions in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals"
Chernivtsi Regional Council:	
600.	to provide funds in the regional budget to create appropriate living conditions for IDPs at the ICC, as well as to strengthen the material and technical base of subordinate social institutions with round-the-clock accommodation
Local self-government bodies:	
601.	Fill the vacancies of specialists in support of veterans and ensure their professional development
602.	Bring the number of employees of services for children in line with the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"
603.	Ensure proper registration and support of active servicemen, their families, families of servicemen who went missing under special circumstances or are in captivity, and veterans
604.	Ensure the creation of family-based forms of upbringing in order to timely place children in need of family upbringing
605.	To publish information on the websites of information managers in accordance with the requirements of the Law of Ukraine "On Access to Public Information"
606.	To ensure that officials hold personal receptions in accordance with the requirements of the Law of Ukraine "On Citizens' Appeals"
The Main Department of the National Police in Chernivtsi region:	
607.	To conduct training on the procedure for responding to cases of child abuse and organising interagency cooperation with relevant actors
to the Main Department of the State Emergency Service of Ukraine in Chernivtsi Oblast:	

608.	To hold a meeting with the heads of territorial communities to bring the state of operation of protective structures in line with the order of the Ministry of Internal Affairs of Ukraine of 9 July 2018 No. 579
to the Chernivtsi Regional Territorial Centre for Recruitment and Social Support:	
609.	Ensure the right to legal aid for those delivered to and detained in the TCC and SIZO, in particular, to arrange places for lawyers to work with clients and guarantee unimpeded access to clients
CHERNIHIV REGION	
Chernihiv regional state administration, regional military administration:	
610.	To ensure that protective structures in educational institutions are brought into proper sanitary and hygienic condition and adequately ventilated in order to create safe conditions for children in accordance with the requirements of the Civil Protection Code of Ukraine and the Requirements for the Maintenance and Operation of Civil Protection Facilities approved by the Order of the Ministry of Internal Affairs of Ukraine of 09.07.2018 No. 579
611.	Ensure the organisation of health improvement and recreation for children in institutional care and education facilities from among orphans and children deprived of parental care, as well as children with special educational needs
612.	Ensure the approval and full funding of the regional programme for meeting the needs of individuals/families in social services based on the identified needs of the population of the region in accordance with paragraph 4 of Article 11, Article 25 of the Law of Ukraine "On Social Services", Resolution of the Cabinet of Ministers of Ukraine of 14 January 2026 No. 64 "Some issues of organising the provision of social services"
613.	Ensure control over the strict compliance with the requirements of the State Standard of Inpatient Care to expand the provision of social inpatient care services (arrangement/creation of beds) for permanent or temporary residence of older persons and persons with disabilities that would fully meet the needs of residents in these services in Chernihiv, Nizhyn, Pryluky, Koryukiv, Bobrovytsia, Horodnya, Nosiv and Osterskyi urban territorial communities
614.	Ensure elimination of the identified violations of the requirements of DBN B.2.2-18:2007 in terms of non-compliance with the permissible standard living space for clients in the living rooms of social institutions

	providing social services with round-the-clock accommodation (stay) and ensure proper control over their compliance
615.	to ensure that the activities of social service providers with round-the-clock accommodation (stay) are brought in line with the Criteria for the activities of social service providers approved by the Resolution of the Cabinet of Ministers of Ukraine of 03.03.2020 No. 185, in particular in terms of ensuring barrier-free space in the premises of such providers in accordance with the requirements of DBN B.2.2-40:2018
616.	to ensure systematic control over the compliance of structural units of the regional military administration and district military administrations with the requirements of the legislation in the field of exercising the right of citizens to apply and access to public information, in particular regarding the completeness and relevance of information published on official websites, the functioning of hotlines and the streamlining of public information accounting systems
To the Main Department of the National Social Service in Chernihiv region:	
617.	Ensure that state control/monitoring measures are taken to ensure that Chernihiv, Nizhyn, Pryluky, Koryukivka, Bobrovytsia, Horodnya, Nosivka and Oster city territorial communities comply with the requirements of the Law of Ukraine "On Social Services" in terms of providing social services of inpatient care for permanent or temporary residence of elderly people and people with disabilities in accordance with the needs of residents of territorial communities for these services, determined in accordance with paragraph 5 of Article 11 and Article 25 of this Law
Local self-government bodies:	
618.	Ensure monitoring of the timeliness of determining the needs of the population of territorial communities for social services in accordance with paragraph 5 of Article 11, Article 25 of the Law of Ukraine "On Social Services", paragraph 4 of Article 34 of the Law of Ukraine "On Local Self-Government in Ukraine", Resolution of the Cabinet of Ministers of Ukraine of 14 January 2026 No. 64 "Some Issues of Organisation of Social Services Provision" and approval of plans for the development of social services in the territorial community based on the results of the assessment
619.	Ensure the approval and full funding of local programmes to meet the needs of individuals/families for social services

620.	to ensure the provision of social services of inpatient care for permanent or temporary residence of elderly persons and persons with disabilities (arrangement/creation of beds) in Chernihiv, Nizhyn, Pryluky, Koryukiv, Bobrovytsia, Horodnya, Nosiv and Oster city territorial communities that would fully meet the needs of the residents of the territorial communities for these services, as defined in accordance with paragraph 5 of Article 11, Article 25 of the Law of Ukraine "On Social Services"
621.	To take measures to expand the network of providers of social inpatient care services based on the identified needs of residents of territorial communities in accordance with Article 11, paragraph 4, Article 25 of the Law of Ukraine "On Social Services", Resolution of the Cabinet of Ministers of Ukraine of 14 January 2026 No. 64 "Some issues of organising the provision of social services", as well as supported living services within the framework of the pilot project on the provision of inpatient social services to internally displaced older persons and persons with disabilities
622.	Ensure constant monitoring of the organisation of safe food, the quality of social services, the organisation of medical care for clients, sanitary and hygienic, anti-epidemic (preventive) and fire protection measures in social institutions that provide social services with round-the-clock accommodation (stay)
623.	Ensure that the number of employees of services for children is brought in line with the Law of Ukraine "On Bodies and Services for Children and Special Institutions for Children"
624.	Ensure proper control over the housing and property rights of orphans and children deprived of parental care, the maintenance of personal files and individual social protection plans
625.	Ensure compliance with the requirements of paragraph 2 of the Resolution of the Cabinet of Ministers of Ukraine of 20.08.2021 No. 893 on the introduction and organisation of the functioning of the child foster care service
626.	Ensure that the information provided for by the Law of Ukraine "On Access to Public Information" is published on official websites and that the right to submit an oral appeal is exercised, in particular by calling the contact number published on the official website

